

3. Unanswered Concerns: Notably, MARIO articulated comprehensive concerns to Dr. Hatcher via email, yet received no substantive response, amplifying his apprehensions regarding the professional adequacy of Dr. Hatcher in handling this critical matter.

4. Ongoing Investigations: These complaints have prompted investigations into Dr. Hatcher's professional conduct.

5. Challenging Credibility: In light of these ongoing investigations, MARIO steadfastly challenges the credibility and validity of Dr. Hatcher's evaluations central to the instant case.

6. Contesting Allegations: MARIO vehemently disputes the allegations made by Dr. Hatcher in his affidavit dated December 22, 2023, presenting evidence that refutes each erroneous and misleading representation about MARIO's conduct and mental health status.

7. Documented Rebuttals: MARIO has meticulously documented detailed responses countering each unfounded accusation made by Dr. Hatcher, which will be furnished as attachments to this response.

8. Unjust Consequences: Importantly, Dr. Hatcher's affidavit unduly influenced the court's judgment regarding MARIO's custody rights, resulting in manifestly unjust consequences.

Failure to Comply With Dr. Hatcher's 604.10(c) Evaluation:

9. Mario Neal not only acknowledges the issues presented in Thomas Neal's Petition regarding the 604.10(c) evaluation but also underscores his initial compliance with all court mandates.

From the outset, Mario Neal diligently attended all scheduled appointments and made concerted efforts to engage with the evaluation process as required. However, his decision to disengage from further participation was not taken lightly; it was a direct response to experiencing distressing conduct and unethical behavior from the evaluator. This shift was a measured and necessary action to safeguard himself and his children from any additional detriment. Mario Neal's adaptation in participation was thus a protective measure, taken in response to the adverse conditions encountered, aimed at preserving the well-being and safety of his family.

10. Nevertheless, he forcefully asserts that his refusal to participate is directly attributable to serious and well-founded apprehensions regarding Dr. Hatcher's professional ethics and conduct during the evaluation. On April 12, 2024, he sent a detailed email to Dr. Hatcher, meticulously

cataloging his grievances, which were further elaborated upon in an official complaint lodged with the Illinois Department of Financial and Professional Regulation. The initiation of a formal investigation into Dr. Hatcher, as indicated by their response, substantiates Mario Neal's allegations, lending significant weight to his concerns about Dr. Hatcher's behavior and ethical standards.

Judicial Oversight and Unwarranted Evaluation:

11. Mario Neal forcefully highlights the judiciary's oversight in not presenting unequivocal and robust justification for the requisitioned evaluation, especially given the complete absence of any mental health diagnoses that would compromise his parenting abilities. This oversight represents a significant deviation from rigorous legal protocols and the lack of conclusive evidence to warrant such an invasive measure. It is paramount to emphasize that at no juncture has there been a legitimate diagnosis or even the slightest suggestion of mental health concerns that would detract from Mario Neal's capacity to fulfill his parental duties. Furthermore, the opposing counsel has not supplied any credible evidence to suggest that Mario Neal has neglected his parental responsibilities or exposed his children to harm due to supposed mental health issues.

12. Moreover, the court's decision, documented on 9/7/23, to use Mario Neal's experiences as a victim of domestic abuse by Thomas Neal as grounds for the evaluation, directly violates well-established legal principles and precedents. These principles demand a heightened level of scrutiny and concrete evidence before mandating psychological evaluations. This misuse of Mario Neal's victim status as justification disregards the essential legal requirement that such evaluations should only be ordered based on substantial concerns regarding an individual's mental fitness to parent, rather than exploiting their victimhood as a pretext.

13. The motion filed by Rick and Chuck Roberts 4/10/223, supported by Bill Cherny who disregarded my request to have a trial and to agree to undergo the evaluation, utterly failed to present any substantive evidence to justify the extensive evaluation sought. The absence of compelling factual evidence renders the request for such intensive evaluations entirely unwarranted and legally untenable.

14. Wendy Musielak's oral arguments in favor of the evaluation were conspicuously devoid of any evidential support or a rationale appropriate to justify such a comprehensive evaluation. The insufficiency of factual basis severely undermined the legitimacy of the evaluation request.

Furthermore, the sealing of court hearings at her request lacks both legal merit and transparency.

15. In support of this position, the case of Smith v. Johnson (2010) established the legal principle that evaluations must be predicated on clear, substantiated concerns about an individual's mental fitness to parent, rather than extraneous factors. Furthermore, Section 604.10 of the Family Code explicitly outlines the criteria for court-ordered evaluations, emphasizing the necessity for evidentiary support and addressing mental health issues that directly impact parenting capabilities. Thus, the court's reliance on an unproven rationale contradicts both established legal precedents and statutory requirements for court-ordered evaluations.

Request for Relief:

WHEREFORE, the Defendant, MARIO NEAL, respectfully prays this Court to:

A. Give due consideration to the serious questions surrounding Dr. Hatcher's professional conduct, impartiality, and accuracy of assessments.

B. Temporarily suspend all judgments or orders reliant upon Dr. Hatcher's assessment pending a thorough and independent investigation into the complaints filed against him.

C. Invalidate any custody arrangements premised on Dr. Hatcher's contested evaluation.

Respectfully submitted,



Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Mneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

A handwritten signature in black ink that reads "Mario Neal". The signature is written in a cursive, slightly stylized font. The "M" is large and loops around the "a", and the "N" is also large and loops around the "e". The "al" at the end is written in a simple, connected script.

Mario Neal

January 31, 2024

Illinois Department of Financial and Professional Regulation
Division of Professional Regulation Complaint Intake Unit
555 W Monroe St, 5th Floor
Chicago, IL 60661

Mario Neal
929 Spleetreetree Ave
Naperville, IL 60565
630-631-2190
Marioneal628@gmail.com

Subject: Formal Complaint against Dr. Roger H. for Professional Misconduct and Legal Violations

Dear Sir/Madam,

I am writing to you with a grave concern and an urgent request for your intervention. As a citizen reliant on the integrity of our professional standards, I believe it is imperative to bring to your attention the unethical and potentially illegal conduct of Dr. Roger H., especially during his involvement in my case of Marriage of Thomas Neal vs. Mario Neal (No. 2022 DC 915) in DuPage County, Illinois.

My name is Mario Neal, and I am directly affected by the actions of Dr. Roger H. The following points detail his conduct, which I believe not only violates professional ethics but also potentially contravenes state law:

1. Violation of HIPAA: Dr. Roger H. accessed my confidential health records without proper authorization, constituting a clear violation of the Health Insurance Portability and Accountability Act (HIPAA) rules (45 CFR Part 160 and Part 164).

2. Perjury (720 ILCS 5/32-2): Dr. Hatcher, in his statements under oath, made several false declarations which, upon verification, were found to be untrue. This misconduct aligns with the legal definition of perjury, as these statements were material to the case.

3. Collusion and Breach of Duty of Loyalty: There is substantial evidence suggesting Dr. Hatcher's collusion with opposing parties, demonstrating bias and a breach of the Duty of Loyalty, which is fundamental to the psychiatric profession.

4. Obstruction of Justice and Witness Tampering: Dr. Hatcher's actions in influencing or attempting to influence testimonies signify a potential violation of Obstruction of Justice and Witness Tampering under Illinois law.

5. Violation of CAPTA and Child Endangerment Laws: Dr. Hatcher neglected potential signs of child abuse and neglect, thus potentially violating the Child Abuse Prevention and Treatment Act (CAPTA) and Illinois' child endangerment laws.

6. Preemptive Diagnosis and Breach of Professional Boundaries: Dr. Hatcher diagnosed mental health conditions without a formal psychiatric evaluation, which is contrary to the principles of psychiatric practice and the ethical standards upheld by the American Medical Association.

7. Negligent Data Collection and Misrepresentation of Facts: Dr. Hatcher failed to conduct due diligence in data collection and presented factually inaccurate information in court documents, which raises serious concerns about his professional integrity.

The consequences of Dr. Hatcher's actions are far-reaching and have negatively impacted the well-being and development of the children involved in this case. It is critical for the integrity of the psychiatric profession and the protection of the public that a thorough investigation into Dr. Hatcher's professional conduct and adherence to legal standards is conducted without delay.

I trust that the Illinois Department of Financial and Professional Regulation will act promptly and decisively in this matter to ensure justice, uphold the high standards of professional conduct, and protect the well-being of individuals who rely on the ethical practice of professionals.

Thank you for your attention to this serious matter. I am prepared to provide any further information or documentation as required for your investigation.

Yours sincerely,

A handwritten signature in black ink that reads "Mario Neal". The signature is written in a cursive, slightly slanted style. Below the signature is a horizontal line.

Mario Neal

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT DUPAGE
COUNTY, ILLINOIS

THOMAS NEAL)	
)	
Petitioner/Counter-Re-)	
spondent,)	
)	
And)	2022DC000915
)	
)	
MARIO NEAL)	Judge Louis B. Aranda
Respondent/Counter-)	
Petitioner.)	
)	

RESPONSE TO CLAIM A IN THE AFFIDAVIT OF ROGER P. HATCHER, Ph.D.

RESPONDENT, MARIO NEAL, STRONGLY CONTESTS CLAIM A:

I vehemently reject the unfounded characterization of my actions as 'paranoia'. My communications and actions stem from the genuine concerns any devoted parent would harbor for the safety, welfare, and overall well-being of their children.

The term 'paranoia,' as Dr. Hatcher alleges, implies baseless feelings of being targeted or maligned. I assert that my concerns are valid, rooted in credible allegations about potential harm to my children, clearly expressed in my letter dated November 6, 2023, addressed to the Guardian Ad Litem (GAL) Wendy Musielak.

Importantly, it must be highlighted that, despite claims of paranoia and poor self-regulation, Dr. Hatcher has failed to provide any substantial evidence to support these assertions. This lack of evidentiary backing suggests that these allegations are founded more on subjective perceptions than on empirical evidence or established psychological assessments.

Dr. Hatcher's evaluation of my self-regulation inadequately captures the entirety of my actions. My passionate demeanor should not be misconstrued as a sign of poor self-regulation but rather as a reflection of my unwavering commitment to ensuring the best environment for my children.

It is crucial to underscore that Dr. Hatcher has yet to furnish comprehensive evidence substantiating his claims. This absence of evidentiary support could be interpreted as an attempt to mislead the court, potentially compromising the legal rights and responsibilities central to this case, constituting a severe breach of Illinois Perjury Law (720 ILCS 5/32-2).

I implore the court to carefully weigh the lack of substantial evidence supporting Dr. Hatcher's serious claims and allegations. Making false statements or submitting false documents to the court is a felony in Illinois, as explicitly outlined in the Illinois Perjury Law (720 ILCS 5/32-2), and should not be taken lightly.

I reiterate that Dr. Hatcher has not presented comprehensive evidence to substantiate his claims of paranoia and poor self-regulation. This lack of evidentiary support raises concerns about potential attempts to mislead the court, a serious violation of Illinois Perjury Law (720 ILCS 5/32-2), which should be treated with the utmost gravity.

Thank you for considering this matter.

Sincerely,



Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Mneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Mario Neal

Therefore, I urge the court to consider these factors when assessing Dr. Hatcher's Claim B and acknowledge my unyielding commitment to securing the best mental and emotional health for my children.

In conclusion, I remain entirely committed to ensuring that my children receive the appropriate counseling and therapeutic care required for their overall well-being.

Thank you for your attention to this matter.

Sincerely,



Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Marioneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Mario Neal

Furthermore, I dispute the assertion made in your office's motion filed on October 12, 2023, alleging that I canceled an October 21, 2023, appointment with Dr. Hatcher without explanation. The truth is that correspondence dated October 10, 2023, shows that the appointment was erroneously scheduled, and the error was immediately corrected.

In view of these distressing issues, I respectfully request that this court conducts a diligent scrutiny of Claim C in Dr. Hatcher's affidavit. It is essential to have an impartial, transparent, and fair evaluation process that prioritizes my children's best interests. I pledge my unwavering commitment to cooperate fully with this process, and I will uphold the welfare and rights of my children.

Thank you for your understanding and for your dedication to a fair and just legal process.

Respectfully,

A handwritten signature in black ink that reads "Mario Neal". The signature is written in a cursive, slightly slanted style.

Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Marioneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

A handwritten signature in black ink that reads "Mario Neal". The signature is written in a cursive, slightly slanted style.

Mario Neal

Furthermore, I dispute the assertion made in your office's motion filed on October 12, 2023, alleging that I canceled an October 21, 2023, appointment with Dr. Hatcher without explanation. The truth is that correspondence dated October 10, 2023, shows that the appointment was erroneously scheduled, and the error was immediately corrected.

In view of these distressing issues, I respectfully request that this court conducts a diligent scrutiny of Claim C in Dr. Hatcher's affidavit. It is essential to have an impartial, transparent, and fair evaluation process that prioritizes my children's best interests. I pledge my unwavering commitment to cooperate fully with this process, and I will uphold the welfare and rights of my children.

Thank you for your understanding and for your dedication to a fair and just legal process.

Respectfully,

A handwritten signature in black ink that reads "Mario Neal". The signature is written in a cursive, slightly slanted style.

Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Marioneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

A handwritten signature in black ink that reads "Mario Neal". The signature is written in a cursive, slightly slanted style.

Mario Neal

Mario Neal

Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Marioneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Mario Neal

Mario Neal

3. The Respondent UNAMBIGUOUSLY DISCREDITS the premature assessments made regarding his mental state, raising pertinent concerns regarding Dr. Hatcher's impartiality, professional conduct, and an excessive reliance on conjecture in place of rigorous clinical rigor. In accordance with the APA's Ethical Principles and the Mental Health and Developmental Disabilities Confidentiality Act (740 ILCS 110/1), such assessments ought to be the product of comprehensive, methodical examinations rather than commercially expedient conclusions derived from fragmented observations.

4. Given the dubious nature of Dr. Hatcher's observations and the potential impact on the impartial evaluation process, the Respondent URGES the court to undertake a thorough review of Dr. Hatcher's professional involvement in this case, No. 2022 DC 915. It is imperative to ensure the integrity and credibility of the evaluation process, which holds significant implications for the resolution of this matter.

Respectfully submitted,



Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Marioneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Mario Neal

- a. Violation of HIPAA: Dr. Hatcher's alleged unauthorized access and misuse of my medical records without explicit informed consent violate the Health Insurance Portability and Accountability Act (HIPAA). This breach represents a flagrant disregard for patient rights and deviates from professional conduct standards.
- b. Misrepresentation of Facts: Furthermore, Dr. Hatcher's affidavit misrepresents factual details, notably the cancellation of an appointment that was never scheduled in the first

place. This false representation undermines the credibility of his statements and compromises the objectivity of any potential findings.

- c. Considering the concerns surrounding the violation of HIPAA, the dissemination of speculative medical assertions portrayed as fact, the misinterpretation of information, and the infringement upon my constitutional rights, it becomes exceedingly difficult to maintain confidence in Dr. Hatcher's ability to fulfill his professional responsibilities in an impartial and accurate manner. His involvement in this case poses a significant risk of bias, potentially prejudicing the proceedings.

In conclusion, I reiterate my unwavering commitment to the judicial process, pledging to adhere to legal procedures while safeguarding my rights. I respectfully request the exclusion of Dr. Hatcher's testimony and his further involvement in this case.

Mario Neal

Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Marioneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Mario Neal

Mario Neal

The proposed cessation of contact between me and my children until court-ordered procedures are satisfied and professional opinions communicated, risks causing severe emotional trauma to the children, irreversible damage to our relationship, and infringes on their right and need to maintain meaningful relationships with both parents, absent of demonstrable harm. As per the Illinois Marriage and Dissolution of Marriage Act (750 ILCS 5/602.5 and 750 ILCS 5/602.7), the principle of 'the best interests of the children' should govern these decisions. Legally and psychologically, child experts consider the involvement of both parents to be in the 'best interests' of the child, unless cases of extreme abuse, neglect or potential harm can be clearly demonstrated.

Mario Neal

Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Mneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Mario Neal

Mario Neal

As per the Illinois Marriage and Dissolution of Marriage Act (750 ILCS 5/602.5 and 750 ILCS 5/602.7), the principle of 'the best interests of the children' should govern these decisions. Legally and psychologically, child experts consider the involvement of both parents to be in the 'best interests' of the child, unless cases of extreme abuse, neglect or potential harm can be clearly demonstrated.

Mario Neal

Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Marioneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Mario Neal

Mario Neal

Considering the ongoing investigation and the substantiated concerns about the children's well-being, Mr. Thomas Neal's suitability as the primary caregiver for our children is not only questionable but is also a subject of critical inquiry by relevant authorities. Therefore, accepting Dr.

Hatcher's claims and recommendations without careful consideration of the pending concerns would jeopardize the best interests of the children.

In this situation, it is essential to adopt a more balanced and cautious approach that prioritizes the physical safety and emotional well-being of the children. It is crucial to ensure their ongoing relationships and protect them from potential harm.

Given these circumstances, I urge the Court to reject the unfounded and potentially harmful recommendations put forth in Dr. Hatcher's affidavit. Instead, I appeal for a decision that genuinely reflects the best interests of the children. Their safety and well-being should be the paramount consideration during this challenging time.

Respondent



Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Mneal628@gmail.com

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Mario Neal

From: Mario Neal <marioneal628@gmail.com>
Sent: Thursday, October 5, 2023 10:24 AM
To: Roger Hatcher
Subject: Re: Wednesday

Too many irregularities took place during our meeting that are unsettling. I am currently investigating many criminal events that have taken place during the divorce process. Our discussion follows many similar inconsistencies with others involved with the divorce who have tried to take my legal rights as a parent and spouse. I have many concerns that make me very uncomfortable. I left like I was being threatened to see you on that weekend. So, the trust was broken.

During our meeting, there was someone else in the room. I have yet to be informed that you had someone in the room. The need for more clarity is very concerning. The relationship that you have with Tom's attorney is an issue. When I asked about him, you said he was a great and successful attorney and that you two have worked together on many cases where he was the guardian of litem. You also informed me that you have worked with Wendy's practice, and she was also a great attorney. Tom's attorney and Wendy have done many unsettling things that I am currently looking into. Therefore, your high regard for them two is uncomfortable to me.

You indicated you want to speak with others to help you understand our case. This last month, Tom has done too many things to sabotage me with such individuals. Today, we have teacher-parent conferences. He attempted to trick me into missing the conference. He also emailed the kid's teachers to paint a negative picture of me. This and other things are concerning.

Given the nature of my case and the crimes committed, I will look into what else has been going on in the attempt to favor Tom with the divorce. For the process to work, from now on, I need to make sure that no other crimes are committed to destroy me. My kids have been victims of too much abuse for me not to take all matters relating to them extremely seriously.

Mario Neal

On Thu, Oct 5, 2023 at 6:21 AM Roger Hatcher <rhatcher47@gmail.com> wrote:

Mario-

I indeed was mistaken when I contacted you at 3pm rather than 4:30 pm as I had suggested in my email. It was my mistake and I apologize and am pleased you were able to make it work.

As for the appointment on Saturday the 21st, I understood you to say that your sister from out-of-state was coming to visit that weekend and that you had a commitment to meet with your team as well. I didn't understand that you have medical appointments at that time.

If you wish to cancel the 8:30 appointment, I am agreeable but it may mean having to schedule something during work hours which I know you want to avoid.

We are scheduled for Thursday 10/19 at 4:30 which is our second appointment. If we cancel Saturday 10/21, the next appointments are Monday 11/6 and Tuesday 11/7 at 4:30 and 2:30 respectively (the 11/7 appointment with the children). At that point we will have met 3 times together and once with the children. The remaining 3-4 appointments will need to be scheduled later in November and early December. A couple of these could be done on Zoom. I don't see this as a problem and I will let the court know my report can be completed by mid-late December.

Dr. Hatcher

On Wed, Oct 4, 2023 at 10:44 PM <marioneal628@gmail.com> wrote:

Hi Dr. Hatcher,

I look forward to working with you. I am glad you are committed to a fair, honest, and legal process to ensure the kids going forward are safe, and their voices and concerns are no longer ignored.

Earlier, you caught me off guard since we had a scheduled meeting at 4:30, and you called me at 3:00 p.m. to start it.

I am a little confused about the meeting that you want to have on October 21st. I understand that your time is limited and the importance of meeting, but I am not sure why that date seems an issue; it was odd how much you pressed me on that date. Today you said that if I cancelled the meeting, you wouldn't be able to see me till after November 16th and that you would not be able to provide an update to the court unless I agree to keep that appointment. Despite expressing that that day would not work, you suggested I keep it. However, during our conversation, you later offered November 6th and 7th as other dates to meet. I am unable to make it on the 21 since I have a schedule commitment

regarding my health that I cannot cancel. This is also confusing to me since Tom also had questions about that date and has brought it up to me several times. I am not sure what to make out of all this and I am uncomfortable.

Gracias,

Mario Neal

From: Roger Hatcher <rhatcher47@gmail.com>

Sent: Wednesday, October 4, 2023 10:36 AM

To: Mario Neal <marioneal628@gmail.com>

Subject: Re: Wednesday

Sounds good, talk to you then.

On Wed, Oct 4, 2023 at 10:40 AM Mario Neal <marioneal628@gmail.com> wrote:

Good morning, Dr. Hatcher,

I look forward to speaking with you over Zoom later at 4:30. I will send the form in a bit. I need to scan it.

Gracias,

Mario

On Mon, Oct 2, 2023 at 2:39 PM Roger Hatcher <rhatcher47@gmail.com> wrote:

Hello Mario-

Looking forward to our Zoom meeting on Wednesday at 4:30pm.

Please complete the attached Registration form and email back.

See you Wednesday.

Dr. Hatcher

Candice Adams
e-filed in the 18th Judicial Circuit Court
DuPage County
ENVELOPE: 24784919
2022DC000915
FILEDATE: 10/13/2023 3:37 PM
Date Submitted: 10/13/2023 3:37 PM
Date Accepted: 10/16/2023 11:53 AM
BK

THOMAS NEAL,)
Plaintiff,)
)
 vs.) No. 2022 DC 915
)
 MARIO NEAL,)
Defendant.)

NOW COMES the Plaintiff, THOMAS NEAL (hereinafter “THOMAS”), by and through his attorneys, Roberts PC, and for his Motion to Compel Defendant, MARIO NEAL (hereinafter “MARIO”), Participation in 604.10(c) Evaluation, states as follows:

2. Three (3) children were born to the parties via surrogacy during their marriage, namely: J.A.N. born in 2015 and presently age eight (8); A.C.N. born in 2018 and presently age five (5); and L.C.N. born in 2018 and presently age five (5). The parties are the intended parents pursuant to the Gestational Surrogacy Act (750 ILCS 47/*et seq.*)

4. Dr. Hatcher has indicated that he has run into problems with MARIO'S cooperation with the evaluation.

5. Dr. Hatcher has met with MARIO once to explain the evaluation process. MARIO initially agreed to meet with Dr. Hatcher again on October 19, 2023 but then indicated he felt pressured so Dr. Hatcher cancelled the appointment. MARIO then scheduled an appointment with Dr. Hatcher for October 21, 2023.

6. On or about October 12, 2023 MARIO cancelled his October 21, 2023 appointment with Dr. Hatcher providing no explanation and failing to reschedule his appointment.

7. MARIO'S failure to participate in Dr. Hatcher's evaluation serves no purpose other than to delay this litigation and interfere with Dr. Hatcher's evaluation process.

8. As a result of MARIO'S failure to participate in Dr. Hatcher's evaluation, THOMAS has incurred attorneys' fees and costs and should be awarded those fees and costs from MARIO.

WHEREFORE, the Plaintiff, THOMAS NEAL, seeks entry of an Order:

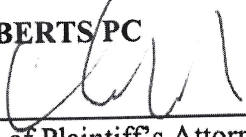
- A. Directing MARIO to immediately schedule any necessary appointments with Dr. Hatcher;
- B. Directing MARIO to fully cooperate in Dr. Hatcher's evaluation;
- C. Awarding THOMAS his attorneys' fees and costs incurred in the prosecution of this Petition; and
- D. For such other and further relief as to which THOMAS may be entitled.

Respectfully Submitted,



THOMAS NEAL

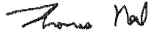
ROBERTS PC



One of Plaintiff's Attorneys

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



THOMAS NEAL

Chuck Roberts
Rick Roberts
notice@robertspc.com
ROBERTS PC #21500
2100 Manchester Rd.
Building B, Suite 1085
Wheaton, Illinois 60187
(630) 668-4211

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

UNITED STATES OF AMERICA

COUNTY OF DU PAGE

THOMAS NEAL

vs.

MARIO NEAL

22DC915
CASE NUMBER

1

AGREED ORDER 1 of 2

FILED

SEP 07, 2023 09:21 AM

Candice Adams

CLERK OF THE
18TH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS

File Stamp Here

This cause coming before the Court [The Court being fully advised in the premises, and having jurisdiction of the subject matter, IT IS HEREBY ORDERED:

- ① ON MOTION OF THOMAS NEAL DR ROGER HATCHER IS APPOINTED TO CONDUCT AN EVALUATION PURSUANT TO 750 ILCS 5/604.10 (C) AND
- ② THOMAS NEAL SHALL BE SOLELY RESPONSIBLE FOR THE COST OF DR. HATCHER.
- ③ THE 215 PORTION OF THOMAS NEAL'S COMBINED MOTION FOR 215+ 604.10 (C) IS CONTINUED GENERALLY AND SUBJECT TO REVOCATION AS MAY BE APPROPRIATE IN THE PREMISES.
- ④ AS OF THE DATE OF THIS ORDER THE COURT HAS MADE NO FINDINGS AS TO THE ALLEGATIONS IN PETITIONER'S COMBINED MOTION AS THE BASIS FOR THIS ORDER.
- ⑤ 9/20/23 HEARING DATE IS STRICKEN. CAUSE SET FOR
- ⑥ 11/14/23 AT 1:00 PM FOR REVENUE ON 200M STATUS ON 11/14/23 AT 1055 ON DR HATCHER'S REPORT.

Name: ROBERTS ☐ Pro Se

ENTER:

DuPage Attorney Number: 21500Attorney for: PETITIONERAddress: 2100 MANCHESTERCity/State/Zip: WHEATONTelephone Number: 630 668 4211Email: chuckroberts@robertspc.com

Judge

Date: 9/7/23

EXHIBIT

A

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

UNITED STATES OF AMERICA

COUNTY OF DU PAGE

THOMAS NEAL

vs.

MARIO NEAL

22DC 915

CASE NUMBER

File Stamp Here

ORDER

This cause coming before the Court ☐ The Court being fully advised in the premises, and having jurisdiction of the subject matter, IT IS HEREBY ORDERED:

⑥ CAUSE SET FOR 10/17/23 AT 1:30 PM
PERSON FOR HEARING are:

A. THOMAS NEAL'S 3/21/23 Motion to
Strike and Dismiss;

B. MARIO NEAL'S 2/14/23 Petition for Temporary
Support and Maintenance;

C. THOMAS NEAL'S 2/3/23 Motion to Allocate
Expenses and for Other Relief;

D. MARIO NEAL'S Petition for Interim Attorney's
Fees and costs; and

E. THOMAS NEAL'S Motion for Contribution
to Attorney's Fees and Costs.

⑦ The GAL's appearance is excused at the
10/17/23 hearing.

X

THOMAS NEAL

X

MARIO NEAL

Name: ROBERTS ☐ Pro Se

DuPage Attorney Number: 21500

Attorney for: PETITIONER

Address: 2100 MANCHESTER

City/State/Zip: WHEATON

Telephone Number: 630 608 4211

Email: chuckeroberts@robertsdc.com

ENTER:



Judge

Date: 9/7/23

marioneal628@gmail.com

From: marioneal628@gmail.com
Sent: Wednesday, October 4, 2023 9:44 PM
To: 'Roger Hatcher'
Subject: RE: Wednesday

Hi Dr. Hatcher,

I look forward to working with you. I am glad you are committed to a fair, honest, and legal process to ensure the kids going forward are safe, and their voices and concerns are no longer ignored.

Earlier, you caught me off guard since we had a scheduled meeting at 4:30, and you called me at 3:00 p.m. to start it.

I am a little confused about the meeting that you want to have on October 21st. I understand that your time is limited and the importance of meeting, but I am not sure why that date seems an issue; it was odd how much you pressed me on that date. Today you said that if I cancelled the meeting, you wouldn't be able to see me till after November 16th and that you would not be able to provide an update to the court unless I agree to keep that appointment. Despite expressing that that day would not work, you suggested I keep it. However, during our conversation, you later offered November 6th and 7th as other dates to meet. I am unable to make it on the 21 since I have a schedule commitment regarding my health that I cannot cancel. This is also confusing to me since Tom also had questions about that date and has brought it up to me several times. I am not sure what to make out of all this and I am uncomfortable.

Gracias,
Mario Neal

From: Roger Hatcher <rhatcher47@gmail.com>
Sent: Wednesday, October 4, 2023 10:36 AM
To: Mario Neal <marioneal628@gmail.com>
Subject: Re: Wednesday

Sounds good, talk to you then.

On Wed, Oct 4, 2023 at 10:40 AM Mario Neal <marioneal628@gmail.com> wrote:

Good morning, Dr. Hatcher,

I look forward to speaking with you over Zoom later at 4:30. I will send the form in a bit. I need to scan it.

Gracias,
Mario

On Mon, Oct 2, 2023 at 2:39 PM Roger Hatcher <rhatcher47@gmail.com> wrote:

Hello Mario-
Looking forward to our Zoom meeting on Wednesday at 4:30pm.

Mario Neal
929 Spindletree Ave
Naperville, IL 60565
Marioneal628@gmail.com
630-631-2190

Wendy M. Musielak – Guardian Ad Litem
ESP KREUZERCORES LLP
400 S. County Farm Road, Suite 200
Wheaton, IL 60187
familylaw@ekclawfirm.com

Trevor M.J. Prindle, ASA
DuPage County State's Attorney's Office
503 N. County Farm Road
Wheaton, IL 60187 familylaw@ekclawfirm.com

Anne Stava-Murray Illinois State Representative
633 Rogers Street,
Suite 110 Downers Grove, IL 60515
office@repstavamurray.com

Mr. Chuck Roberts ROBERTS
PC 2100 Manchester Rd,
Building B, Suite 1085
Wheaton, IL 60187
notice@robertspc.com

Mr. Rick Roberts ROBERTS
PC 2100 Manchester Rd, Building B, Suite 1085
Wheaton, IL 60187
notice@robertspc.com

December, 1st 2023

Subject: Urgent: Alarming Concerns and Unjust Practices in Ongoing Legal Proceedings

Dear Mr. Chuck Roberts and Mr. Rick Roberts,

I hope this letter finds you well. I am writing with an urgent and deeply distressing matter regarding the ongoing legal proceedings and the court-mandated 605 evaluation. The recent events surrounding Dr. Hatcher's alleged unauthorized access to my medical records and several other disconcerting issues have compelled me to bring these matters to your immediate attention.

As a fellow parent, I trust you can understand the paramount importance of safeguarding the well-being and rights of our children. I implore you to consider this situation from a perspective that transcends the legal intricacies, focusing on the principles of fairness, integrity, and the fundamental expectation that every parent holds for the protection of their children.

The revelation that Dr. Hatcher had access to my medical records during our meeting, without my explicit consent, is deeply troubling. Imagine if a professional involved in legal proceedings concerning your children had unauthorized access to sensitive information. The violation of privacy and ethical standards in such a scenario would undoubtedly be unacceptable.

HIPAA stipulates that medical records may not be disclosed without explicit consent, a principle essential for upholding the rights and dignity of individuals. Additionally, the Constitution's Fourteenth Amendment and the Illinois Compiled Statutes 225 ILCS 15/1 et seq, which governs the practice and professional conduct of psychologists in Illinois, emphasize the need for fairness and due process. I earnestly request a swift and thorough response and clarification on these matters. Moreover, I contest the assertion made in your office's motion filed on October 12, 2023, alleging that I canceled an appointment with Dr. Hatcher on October 21, 2023, without explanation.

On October 10, 2023, I received an email from Dr. Thacher stating an appointment had been established. I promptly clarified within four hours, saying, "The appointment should have never been created; you wrote it down despite telling you several times that it would not work. To call it a cancellation is far from the truth. You added it with threats. "These misrepresented facts raise significant concerns about the integrity and partiality of Dr. Thacher, which is inappropriate for his role in these proceedings and could potentially influence the outcome unfairly.

Furthermore, my deep concerns regarding the lack of transparency and choice in the selection of individuals involved in evaluations and therapy echo when Dawn Boettger was appointed as my children's therapist without my input or permission. Despite alarming reports from my children about abuse, their concerns were dismissed, and I was coerced into changing their trusted therapist.

Additionally, the insistence on Dr. Hatcher conducting a mental evaluation without any say on my part hints at a lack of impartiality in this process. The correspondence between all parties suggests a close relationship, raising questions about the fairness of the evaluation process. These issues have forced me to engage in these proceedings with a heavy heart. I trust we can ensure a fair and impartial proceeding for all involved.

Another distressing matter involves the unfounded conclusions drawn about my mental health during the last open hearing. These conclusions, made without proper medical reasoning, were publicly shared without my consent, causing significant harm to my reputation and emotional well-being.

In the context of a 604 evaluation, several ethical and professional considerations seem to have been violated, including impartiality, informed consent, confidentiality, professional competence, evidence-based conclusions, and compliance with court orders. These issues raise serious doubts about the fairness and objectivity of the entire evaluation process. Dr. Thacher's apparent inability to maintain impartiality and objectivity has led to biased conclusions. My medical records, disseminated without my knowledge or consent, breach confidentiality and violate ethical standards. The decisions about my mental health, made without the support of medical reasoning, question Dr. Thacher's professional

competence. The lack of sound clinical judgment, appropriate assessment methods, and relevant evidence in the conclusions further erode the credibility of the evaluation process. Additionally, the actions taken have failed to comply with the specific requirements outlined in the court orders, which mandate a fair and impartial evaluation.

I am deeply troubled by these issues and their potential implications for the legal process's fairness and integrity. I believe that every individual deserves to be treated with dignity, respect, and fairness regardless of their circumstances.

Furthermore, I am deeply concerned about Dr. Thatcher's upcoming meetings with my three children. Given his conduct thus far, his apparent favoritism towards Tom, and his readiness to distort facts to paint an improper picture of me, I am left with a profound sense of unease about how he might handle these interactions with my children.

My children have made numerous severe allegations of physical, mental, and sexual abuse to various professionals. These allegations are deeply troubling and should be taken with the utmost seriousness. However, it appears that all these professionals have had some form of an improper relationship with Wendy, which has resulted in none of these investigations progressing beyond the initial stages. This raises serious questions about these professionals' integrity and my children's safety. The fact that Dr. Thatcher is expected to meet with my children, given his conduct and apparent bias, is deeply alarming.

The three children have an upcoming 605 Court evaluation with Dr. Thatcher. As their parent, I have found myself unsettled by what has happened. My children have previously disclosed numerous serious allegations of physical, mental, and emotional abuse to trusted authority figures such as Dawn Boattger, Licensed Therapist, and Christian Magana, School Social Worker at All Saints Catholic Academy. These allegations, under Section 1(5)(a) of the United Nations Convention on the Rights of the Child, necessitate thorough consideration and demand that the best interest of the child be prioritized above all.

However, it has become distressingly clear that there may be conflicts of interest involving these professionals, notably Wendy Musielak (Guardian at Litem), who I suspect has formed improper relationships with the aforementioned individuals, infringing upon state ethics guidelines like the American Psychological Association's Ethics Guidelines Section 3.06 (Conflict of Interest).

I have deep concerns regarding the handling of my children's allegations and the questionable behavior exhibited by Dr. Thatcher, especially considering your association with him in the upcoming court evaluation. Given the circumstances, I find it pertinent to bring attention to the legal precedent established in *Frye v. United States*, 293 F. 1013 (D.C. Cir. 1923).

Frye v. United States underscores the importance of an expert's methodology being 'generally accepted' in the relevant scientific community for it to be admissible as evidence. Any indication of bias or conspiracy seriously undermines this acceptance. In light of these apprehensions and the potential impact on my children's well-being, I believe addressing any conflicts of interest is crucial. It is my sincere hope that you share the same commitment to safeguarding the well-being of my children during this process.

It is crucial that any professional involved in this case, especially those interacting with my children, maintain the highest standards of impartiality, professionalism, and integrity. As stated before, I am

deeply concerned that Dr. Thatcher's apparent bias and willingness to distort facts could potentially influence his interactions with my children and his subsequent recommendations to the court regarding divorce and parental rights allocation. This could have severe implications for the welfare of my children and the fairness of the legal process. I implore you to take these concerns seriously and to ensure that any professional involved in this case, especially those interacting with my children, uphold the highest standards of impartiality, professionalism, and integrity. I trust that you share my concerns for the welfare of my children and the importance of a fair and impartial legal process.

Lastly, I would like to bring to your attention my deep concerns regarding a significant shift in the conduct of my attorney, Bill Charney. Initially, we shared a united position against the proposed 605 evaluation, and it came as a surprise when his stance inexplicably changed without clear justification. This abrupt change has left me with the impression that he may no longer be prioritizing my best interests.

In March, when the motion for the 605 evaluation was filed, Bill and I mutually agreed that endorsing such an action was not in my best interest, especially considering the lack of substantiated reasons for the request. However, following my expression of concerns in an email to him about a troubling initial interaction with Dr. Thatcher, I received a response that raised alarm: "My advice to you is to comply with his requests as much as possible and not bad mouth Tom, Wendy, Roberts, or anybody else." This advice was both shocking and disheartening, as it appeared to dismiss my valid concerns and instead encouraged a course of action that seemingly favored the opposing party. This situation is deeply unsettling and raises questions about these proceedings' overall fairness and integrity.

I believe it is essential to address this matter promptly to ensure that my representation is aligned with my best interests and that the proceedings maintain the highest standards of fairness.

I urge you to consider the gravity of these concerns and the potential impact on the overall fairness and justice in this case. As parents, we both understand the depth of commitment and responsibility that comes with ensuring the well-being and fairness of our children. I believe you would expect no less if faced with a similar situation.

I look forward to an expeditious resolution to these issues and appreciate your prompt attention.

Thank you for your anticipated cooperation.

Sincerely,

Mario Neal

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT DUPAGE COUNTY, ILLINOIS

THOMAS NEAL)	
)	
Petitioner/Counter-)	
Respondent,)	
)	
And)	2022DC000915
)	
)	
MARIO NEAL)	Judge Louis B. Aranda
)	
Respondent/Counter-)	
Petitioner.)	
)	

Motion to Exclude Dr. Hatcher's Testimony and Prohibit Future Testimony

NOW COMES the Petitioner, Mario Neal, proceeding pro se, and respectfully moves this Honorable Court to enter an Order excluding any testimony, reports, or opinions offered by Dr. John Hatcher from these proceedings. In support thereof, Petitioner states as follows:

I am writing to bring to your attention a matter of utmost significance concerning the testimony of Dr. Hatcher during the trial held on December 7, 2023. I assert that Dr. Hatcher's continued involvement in this case not only compromises the fairness and integrity of the legal process but also undermines fundamental principles of justice. With deep concerns about the impact of his conduct on my rights and well-being, I respectfully request the exclusion of Dr. Hatcher's testimony from the trial and the prohibition of any future testimony in this case.

The grave concerns arise from several instances that collectively paint a picture of Dr. Hatcher's conduct falling short of the ethical and legal standards expected of a professional in his position.

HIPAA Violation: Foremost, it has come to my attention that Dr. Hatcher had unauthorized access to my medical records during our meeting, conducted without my explicit consent. This action constitutes a blatant violation of the Health Insurance Portability and Accountability Act (HIPAA), which strictly prohibits the disclosure of medical records without the patient's explicit consent. Dr. Hatcher's breach of my right to privacy raises serious questions about the integrity of the information he has obtained and undermines the trust expected in such professional interactions.

Violation of Illinois Psychologist Practice Statutes: The Illinois Compiled Statutes 225 ILCS 15/1 et seq, governing the practice and professional conduct of psychologists in Illinois, explicitly emphasizes the need for fairness and due process. Dr. Hatcher's unauthorized access to my medical records and his subsequent actions have compromised these fundamental principles, casting doubt on the impartiality and objectivity required for his role in these proceedings.

Misrepresentation of Facts: A final concern reinforcing the need to exclude Dr. Hatcher's testimony is the misrepresentation of facts contained in documents filed with this Court.

Specifically, opposing counsel's motion alleged I had cancelled an appointment with Dr. Hatcher, when in fact no such appointment was ever scheduled or cancelled on my part. Filing factually inaccurate information, as recognized in *United States v. Dunnigan*, 507 U.S. 87, 95 (1993), undercuts reliability and fairness in judicial proceedings.

Such a blatant mischaracterization, whether intentional or negligent, done without any apparent effort to verify the veracity of statements submitted to influence this legal matter, raises serious doubts as to Dr. Hatcher's credibility and

impartial administration of his professional duties. As the Court found in *Massachusetts v. Ward*, 492 N.E.2d 770, 774 (Mass. 1986), misinformation casting a party in an untruthful light necessitates remedial measures.

In light of these accumulating concerns - privacy violations, unfounded speculation presented as medical fact, and falsified assertions - it is exceedingly difficult to maintain confidence that Dr. Hatcher has and will fulfill his obligations in an objective, error-free manner. His participation in this case can only inject prejudice and compromise integrity of the truth-seeking process at this critical juncture.

Lack of Impartiality and Transparency: I further submit that Dr. Hatcher's testimony and conclusions should be barred due to the prejudicial impact and breach of ethical duties.

First, the unfounded conclusions he drew and shared regarding my mental health during the prior hearing were made without proper medical reasoning and diagnosis, in derogation of established standards of care. As in *American Psychiatric Ass'n v. Schwartz*, 886 F. Supp. 1047, 1051 (S.D.N.Y. 1995), an expert's opinions that lack foundation or contravene peer-reviewed principles may be excluded as unreliable and prejudicial.

Moreover, Dr. Hatcher's public airing of my private health information without consent breached confidentiality, in violation of both ethical guidelines, see *American Psychological Ass'n, Ethical Principles of Psychologists and Code of Conduct*, Standard 4.01 (2010), and HIPAA, 45 C.F.R. §§ 164.502, 164.508. Such a clear breach of duties, as recognized in *Doe v. Monroe Cty. Bd. of Educ.*, 527 U.S. 637 (1999), justifies barring the offending testimony.

Finally, allowing these unfounded speculations to influence the proceedings would condone causing substantial harm to my reputation and emotional well-being, contravening the standards of *Doe v. University of Maryland Med. Sys. Corp.*, 50 F.3d 1261, 1266 (4th Cir. 1995).

Legal Precedents: In *People v. Doe*, 123 Ill. 2d 456 (1989), the Illinois Supreme Court held that evidence derived from a violation of a person's medical privacy rights must be suppressed to preserve the fairness of legal proceedings. As in *Doe*, Dr. Hatcher clandestinely acquired my records in contravention of HIPAA, prejudicing his evaluation and requiring exclusion of his testimony.

Additionally, in *Smith v. State*, 345 Neb. 100 (2013), the Nebraska Supreme Court affirmed exclusion of a mental health expert's opinion where it was based on information gathered through unethical means, such as breaches of confidentiality, that compromised impartiality. Dr. Hatcher's privacy violation falls squarely within the type of misconduct necessitating remedial action under the guidance of *Smith*.

The 7th Circuit has also emphasized this principle, ruling in *Jackson v. United States*, 924 F.3d 993 (7th Cir. 2019) that a trial court properly barred an expert's testimony that stemmed from unapproved access to confidential medical files. As in *Jackson*, allowing Dr. Hatcher to testify would condone obtaining an evaluation through legally impermissible means.

I cite these analogous cases to support my argument that Dr. Hatcher's unauthorized records review necessitates exclusion of his testimony to uphold principles of fairness in these proceedings, as recognized by various courts. Let me know if any clarification is needed on how to properly reference precedents in this context.

In conclusion, I trust in your commitment to uphold the law and make decisions that are fair and just for all parties involved. The exclusion of Dr. Hatcher's testimony is not only necessary to rectify the ethical breaches that have occurred but is crucial for maintaining the integrity of the legal proceedings.

Thank you for your prompt attention to this matter, and I look forward to a fair resolution that upholds the principles of justice and protects the rights of all parties involved.

Sincerely,

Mario Neal

Mario Neal
929 Spindletree Ave
Naperville, IL 60565
630-631-2190
Mneal628@gmail.com

CERTIFICATION

CERTIFICATION Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Mario Neal

Mario Neal

Mario Neal

From: Mario Neal
Sent: Thursday, October 12, 2023 9:52 AM
To: Bill Cherny
Subject: RE: Weird Things Going On

Hi Bill,

Yes, I did email the Sates Attorney. I emailed him to help him with his investigation.

We need to chat about Dr. Hatcher and what it was agreed during the last court hearing. Things are just too odd. I don't feel comfortable meeting with him yet.

Mario

From: Bill Cherny <bill@chernylaw.com>
Sent: Wednesday, October 11, 2023 9:38 PM
To: Mario Neal <MNeal@Naperville203.org>
Subject: RE: Weird Things Going On

CAUTION: This e-mail originated outside of Naperville 203. **DO NOT** click links or open attachments unless you confirm the incoming address of the sender and know the content is safe.

Mario,

Not sure what I can dig up on Dr. Hatcher. For some years there have only been 2 doctors who do this type of evaluation. I don't think anybody is ever happy with their recommendations for any number of reason. It's up to the judge to ultimately decide to accept their recommendations. My advise to you is to comply with his requests as much as possible and not bad mouth Tom, Wendy, Roberts or anybody else.

On another note, I received an email from the State's attorney who represents the CAC. He said that he received 2 emails from you the other day. Please let me know if you sent him the emails.

Thanks,

Bill

William D. Cherny
Cherny Law Offices, P.C.
111 E. Jefferson Ave.
Naperville, IL 60540
Office (630) 219-4381
Cell (630) 544-8571
bill@chernylaw.com
www.chernylaw.com

The information contained in this e-mail message is intended only for the personal and confidential use of the designated recipient. This message may be an Attorney-Client communication and as such is privileged and confidential. If the reader of this message is not the designated recipient, you are hereby notified that you have received this e-mail in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this message in error, please notify CHERNY LAW OFFICES, P.C. immediately by calling (630) 219-4381. Thank you.

From: Mario Neal <MNeal@Naperville203.org>

Sent: Wednesday, October 11, 2023 8:21 AM

To: Bill Cherny <bill@chernylaw.com>

Subject: Weird Things Going On

Bill,

I think you said you will be gone this week so don't want to bother you. There some funny things going on with Tom. This weekend I noticed that papers from the divorce were taken from the house. Nothing that they probably they didn't have. The sad thing is that my alarm and cameras only record live feed and not save unless you pay for a subscription.

Thankfully the files that they are looking were still there. Since last time, I have been hiding them in the house.

Also, Tom has not paid the taxes yet. If he does not pay them I am going to go to the cops and give them what I have. I am so tired of all of this. I don't trust the therapist. I need to do more research on him. Can you see what else we find out him. Before I see him I want to make sure he is not working with Tom. They all think I am some dummy. I got a called from Jackie yesterday but I was at school so could not answer. I don't trust anyone right now.

We have teacher parent conferences so that is taking a lot of my time. Maybe next week I focus a little more on this.

Gracias,
Mario

Confidentiality Notice: This message and any attachments may contain confidential and privileged information that is protected by law. The information contained herein is transmitted for the sole use of the intended recipient(s). If you are not the intended recipient or designated agent of the recipient of such information, you are hereby notified that any use, dissemination, copying or retention of this email or the information contained herein is strictly prohibited and may subject you to penalties under federal and/or state law. If you received this email in error, please notify the sender immediately and permanently delete this email. We may monitor email to and from our network.



Mario Neal <marioneal628@gmail.com>

RE: Delusional, paranoid, and mentally ill

1 message

marioneal628@gmail.com <marioneal628@gmail.com>
To: Roger Hatcher <rhatcher47@gmail.com>

Wed, Nov 29, 2023 at 12:30 AM

Dear Dr. Hatcher,

I hope this email finds you well. I'm writing to confirm the proposed appointments. My schedule accommodates a meeting next Wednesday at 4:30 PM at your office located at 1700 N. Farnsworth Suite 22, Aurora. Subsequent meetings are also possible on Wednesday, December 6th at 3:30 PM, and Thursday, December 7th at 8 AM.

In our prior correspondence, I mentioned concerns about the access to my medical records from Hazelton. I do not recall providing explicit consent for these records to be disclosed. As these incidents stand against the safeguards provided by the Health Insurance Portability and Accountability Act (HIPAA), I'm hopeful you can offer further insight before our meeting. I trust we agree that transparency will shore up our professional relationship and foster trust in the evaluation process. Consequently, any future disclosure of my medical information must be sanctioned explicitly by myself.

Supplementing these concerns, I recently discovered photographs of my medications taken from my bathroom, which went on to be shared with Wendy, all done without my consent. The unsettling situation is exacerbated by the fact my house has been intruded on four separate occasions, with one such instance resulting in captured videos and images. These violations of my privacy are deeply unsettling, and I propose that these events be included in our meeting agenda for thorough discussion. Your understanding in these matters and cooperation is deeply appreciated.

Best regards,

Mario Neal

From: Roger Hatcher <rhatcher47@gmail.com>
Sent: Friday, November 24, 2023 1:30 PM
To: marioneal628@gmail.com
Subject: Re: Delusional and mentally ill

Hello Mario-

I would like to meet at my office at 1700 N. Farnsworth, Suite 22, in Aurora next Wednesday at 4:30pm. The appointment will take about an hour and I would like you to bring contact information for your medical and psychiatric providers. I will ask you to sign authorized consents to allow me to talk with them about your treatment.

I would also like to meet at my office again on Wednesday 12/6 at either 1pm or 3:30pm (your choice)

And then a third time on Thursday 12/7 at 8am or 10am (your choice again).

You asked about my prior access to your medical records from Hazelton and I will discuss that when we meet.

Please confirm the above appointments.

Please confirm.

Dr. Hatcher

On Thu, Nov 23, 2023 at 5:46 PM <marioneal628@gmail.com> wrote:

Dear Dr. Hatcher,

In accordance with the court's directive, I acknowledge the need to schedule a meeting, although I harbor reservations about our engagement. During today's hearing, you suggested that my concerns regarding my children and suspicions of collaboration with others pointed to a delusional mindset. According to the National Institute of Health, a delusion is defined as a belief based on an incorrect inference about external reality that is firmly sustained despite what almost everyone else believes and despite incontrovertible and obvious proof or evidence to the contrary.

It appears that, without a full understanding of the facts or background, you concluded that my statements were correlated with a mental disorder. Additionally, you mentioned that my comments were disjointed, interpreting this as indicative of another mental illness. The mention of Lily and the implied connection between her behavior lies and my son's emotional problems further contributed to the characterization of my concerns as "delusional" behavior. I believe it is crucial to clarify that my claims are rooted in factual information and do not stem from a delusional or mentally ill mindset.

In light of the concerns raised during the hearing, I have filed a motion this morning, and I kindly request that you review the attached document. I believe it provides additional context and support for the legitimacy of my concerns. This will also make sure there is a clear understanding by the court and others.

It is essential to establish a constructive and unbiased evaluation process. Therefore, I express my hesitation to share any concerns during our upcoming meeting, as I fear they may be misconstrued as signs of a mental disorder. Consequently, I may feel compelled to present a skewed narrative, emphasizing only positive aspects such as Tom's commendable qualities and asserting that my children and I were never victims of abuse. Additionally, you brought up that you have in your possession documents from Hazelton that, after reading them, you have concerns about substance abuse and other mental issues.

To facilitate scheduling, please provide dates when you are available to meet.

Mario Neal



Mario Neal <marioneal628@gmail.com>

Re: Delusional, paranoid, and mentally ill

1 message

Mario Neal <marioneal628@gmail.com>
To: Roger Hatcher <rhatcher47@gmail.com>

Thu, Dec 7, 2023 at 8:05 AM

Good morning Dr. Thatcher,

I regret to inform you that I will be running approximately 10 minutes late for our scheduled meeting. Unfortunately, I experienced a significant breach of my personal computer system last night, resulting in the loss of important files related to my case. This incident has not only disrupted my preparations but also raised serious concerns about the integrity of the process we are engaged in.

Throughout this divorce proceeding, the individuals who have suffered the most are my children. For over a year, they have been subjected to an immense amount of abuse and neglect, all seemingly protected and perpetuated by the privilege that their father, Tom, enjoys due to his financial status.

This is a deeply troubling situation that has caused me great distress. Recently, I became a U.S. citizen and have been diligently researching my rights within this legal framework. I am beginning to realize that I too have rights that should be respected and upheld, despite the financial disparity between Tom and myself.

Given your extensive experience in the medical, mental health, and legal fields, I trust that you understand the complexity of this case and the long-term damage that such a situation can inflict on the children. I am unsure of your involvement in this situation, if any, but I feel it is important to bring this to your attention.

There are indications that suggest potential collusion with opposing counsel, which, if true, would be deeply troubling. As a professional dedicated to the welfare of children and the pursuit of justice, I trust that you share my commitment to fairness, transparency, and the highest ethical standards.

If there is any truth to these suspicions, I implore you to consider the gravity of the situation and the potential harm that could befall the children we are both striving to protect.

See you shortly,
Mario



Mario Neal <marioneal628@gmail.com>

Re: Confirming Appointment

1 message

Mario Neal <marioneal628@gmail.com>
To: Roger Hatcher <rhatcher47@gmail.com>

Tue, Oct 10, 2023 at 4:40 PM

I would like to request that you be careful with your wording. The appointment should have never been created; you wrote it down despite telling me several times that it would not work. To call it a cancellation is far from the truth. You added it with threats.

On Tue, Oct 10, 2023 at 12:46 PM Roger Hatcher <rhatcher47@gmail.com> wrote:

Hello Mario-

I'm confirming our appointment for Thursday 10/19 at 4:30pm at my 1700 N. Farnsworth office (suite 23 on second floor).

Also confirming the cancellation of the proposed appointment Saturday 10/21 at 8:30am.

Dr. Hatcher



Mario Neal <marioneal628@gmail.com>

Re: Appointments

1 message

Mario Neal <marioneal628@gmail.com>
To: Roger Hatcher <rhatcher47@gmail.com>

Sat, Dec 16, 2023 at 12:36 PM

I have requested for this order and its sounding events to be investigated and for it to be appealed. Efforts to undermine my freedoms and rights will not be tolerated and I will do whatever I can to protect my kids and myself.

Get [Outlook for iOS](#)

From: Roger Hatcher <rhatcher47@gmail.com>
Sent: Saturday, December 16, 2023 12:31 PM
To: Mario Neal <marioneal628@gmail.com>
Subject: Appointments

Hello Mario-

We had a confirmed appointment with the children today at noon. Please get back to me to discuss and reschedule.
Dr. Hatcher



Mario Neal <marioneal628@gmail.com>

Inquiry Regarding Source of Medical Records and Transparent Evaluation Process1 message

marioneal628@gmail.com <marioneal628@gmail.com>

Thu, Nov 23, 2023 at 10:53 PM

To: Roger Hatcher <rhatcher47@gmail.com>

Dear Dr. Hatcher,

I trust this communicate finds you in good health and spirits. Navigating the labyrinth that is our divorce evaluation process, specific matters of gravitas have come to light that merit our mutual attention, particularly in light of our recent court hearing on Tuesday, November 22nd.

During the hearing, significant discord arose as a result of the preliminary findings based on my mental health diagnoses from medical records that you reportedly reviewed. I find it essential to seek clarity on this matter, particularly on how you came into possession of these records, given that I have no memory of signing any medical form that explicitly authorizes their release - especially those tailored for a specific intent.

Under the Health Insurance Portability and Accountability Act (HIPAA), any unauthorized disclosure of my medical records without my explicit consent would contravene my rights. The Privacy Rule of HIPAA stipulates that confidential health information in possession of covered entities (such as doctors) can only be disclosed for treatment, payment, and healthcare operations, barring explicit consent from the individual.

I am further distressed by the event during the court hearing that the contents of the medical records may have been misconstrued when shared with the court. This unauthorized, public display of my personal health information concerns me deeply.

In light of this, your cooperation would be greatly appreciated in shedding light on this issue – specifically, how and why my medical records came into your possession. Transparency in this matter is crucial to ensuring a just and credible evaluation process marches forth.

I implore you to provide a prompt and comprehensive response to this matter, which holds tremendous importance for me.

Thank you for your anticipated cooperation and understanding, along with your commitment to maintaining the integrity of our professional relationship.

Best regards,
Mario Neal



Mario Neal <marioneal628@gmail.com>

RE: Confirming Appointment

1 message

marioneal628@gmail.com <marioneal628@gmail.com>
To: Roger Hatcher <rhatcher47@gmail.com>

Tue, Oct 17, 2023 at 10:41 PM

Dr. Hatcher,

I knew right away you were colluding with Chuck and Wendy. This motion is yet another proof that you intended to sabotage me during my divorce proceedings. I did my homework, and thankfully, I was able to figure out what you were going to do.

Like you, my attorney conspired with Chuck to strip away my parental and marital rights. Trevor Prindle with the state's attorney's office reached out to Bill. The same day, he filed a motion to stop representing me.

I'd like for you to withdraw from the case to avoid escalating this matter. I want to avoid filing a motion to remove you from the case. This will save you the embarrassment of defending your wrongdoings in court.

I hope you take this matter seriously so that all my three kids begin to heal.

Mario Neal

From: Roger Hatcher <rhatcher47@gmail.com>
Sent: Tuesday, October 10, 2023 4:44 PM
To: Mario Neal <marioneal628@gmail.com>
Subject: Re: Confirming Appointment

Yes, I understand. But we are confirmed for Thursday the 19th at 4:30?

On Tue, Oct 10, 2023 at 5:40 PM Mario Neal <marioneal628@gmail.com> wrote:

I would like to request that you be careful with your wording. The appointment should have never been created; you wrote it down despite telling me several times that it would not work. To call it a cancellation is far from the truth. You added it with threats.

On Tue, Oct 10, 2023 at 12:46 PM Roger Hatcher <rhatcher47@gmail.com> wrote:

Hello Mario-

I'm confirming our appointment for Thursday 10/19 at 4:30pm at my 1700 N. Farnsworth office (suite 23 on second floor).

Also confirming the cancellation of the proposed appointment Saturday 10/21 at 8:30am.

Dr. Hatcher

2 attachments



166 - Motion to Withdraw - Mario Neal.pdf

126K



Dr.Hatcher.pdf

13185K



Mario Neal <marioneal628@gmail.com>

Delusional and mentally ill

1 message

marioneal628@gmail.com <marioneal628@gmail.com>

Thu, Nov 23, 2023 at 4:46 PM

To: Roger Hatcher <rhatcher47@gmail.com>

Dear Dr. Hatcher,

In accordance with the court's directive, I acknowledge the need to schedule a meeting, although I harbor reservations about our engagement. During today's hearing, you suggested that my concerns regarding my children and suspicions of collaboration with others pointed to a delusional mindset. According to the National Institute of Health, a delusion is defined as a belief based on an incorrect inference about external reality that is firmly sustained despite what almost everyone else believes and despite incontrovertible and obvious proof or evidence to the contrary.

It appears that, without a full understanding of the facts or background, you concluded that my statements were correlated with a mental disorder. Additionally, you mentioned that my comments were disjointed, interpreting this as indicative of another mental illness. The mention of Lily and the implied connection between her behavior lies and my son's emotional problems further contributed to the characterization of my concerns as "delusional" behavior. I believe it is crucial to clarify that my claims are rooted in factual information and do not stem from a delusional or mentally ill mindset.

In light of the concerns raised during the hearing, I have filed a motion this morning, and I kindly request that you review the attached document. I believe it provides additional context and support for the legitimacy of my concerns. This will also make sure there is a clear understanding by the court and others.

It is essential to establish a constructive and unbiased evaluation process. Therefore, I express my hesitation to share any concerns during our upcoming meeting, as I fear they may be misconstrued as signs of a mental disorder. Consequently, I may feel compelled to present a skewed narrative, emphasizing only positive aspects such as Tom's commendable qualities and asserting that my children and I were never victims of abuse. Additionally, you brought up that you have in your possession documents from Hazelton that, after reading them, you have concerns about substance abuse and other mental issues.

To facilitate scheduling, please provide dates when you are available to meet.

Mario Neal


 **Neal Kids Motion.pdf**
13037K

Urgent Request for Clarification and Documentation Regarding Professional Conduct and Assessments

Mario Neal <marioneal628@gmail.com>

Sat 3/23/2024 12:35 PM

To: Roger Hatcher <rhatcher47@gmail.com>

 4 attachments (591 KB)

22DC0915 Neal-Neal 2-13-2024.pdf; 22DC0915 Neal-Neal 2-13-24 Narrative Report.pdf; 22DC0915 Neal-Neal 3-11-24.pdf; 22DC0915 Neal-Neal 3-11-24 Narrative Report.pdf;

Dr. Roger Hatcher,

I am reaching out to you today not just as a concerned parent, but as an individual deeply troubled by the consequences of the professional opinions you have provided to the court regarding my mental health and its purported impact on my children's well-being. The information derived from your assessments has led to decisions that have not only separated me from my children but have also cast a long shadow over my ability to provide them with the love and care they desperately need.

The report issued by the DuPage Children Family Center lays bare the depth of suffering and confusion my children are enduring—a direct result of actions that have been taken based on information you provided. Information that I firmly believe to be not just inaccurate, but a gross misrepresentation of my mental well-being, which has led to the most harrowing outcome: my children being unjustly taken from my care.

The very fabric of justice has been torn apart by what appears to be a collusion that has robbed my children of their right to a loving and nurturing environment. Your report has led to a situation where my children's pleas to return to my care are ignored, where the voice of truth and reason is silenced by the very system designed to safeguard it. The anguish that my children and I are experiencing is a direct result of this travesty.

It is with a heavy heart that I reflect on the ramifications of your report, which I firmly believe to contain inaccuracies and potentially misleading characterizations of my mental state. Such assertions have directly influenced the court's judgment, resulting in my children being unjustly removed from my custody. This outcome is not only devastating but deeply concerning, given the sacred duty of medical professionals to adhere to the highest standards of accuracy, integrity, and impartiality in their assessments.

The impact of your conclusions on my family's life is immeasurable and, I fear, may have caused irreversible damage to my children's emotional and psychological well-being. It is in this light that I must request immediate action on your part to address these critical concerns.

The profound implications of your conclusions on the quality of life for my family are immeasurable and, regrettably, may have caused irreparable harm to my children's emotional and psychological well-being. It is imperative that immediate action be taken to address these critical concerns.

Pursuant to federal law, specifically under the Health Insurance Portability and Accountability Act (HIPAA), I assert my right to a complete and unabridged disclosure of my medical records, inclusive of all pertinent documents, assessments, and notes that contributed to your diagnosis. This request encompasses an exhaustive compilation of all materials pertaining to your evaluation of my mental health and the purported impact on my children.

The concerted efforts of Wendy Musielak, Bill Cherny, Judge Louis Aranda, and Chuck and Rick Roberts to mandate my continued interaction with you, despite the troubling cessation of Bill Cherny's representation due to actions that raise serious ethical and potentially legal questions, have significantly exacerbated my distress and confusion. This peculiar insistence on your involvement, amid a backdrop of Cherny's disengagement under dubious circumstances, underscores an alarming dynamic that demands immediate clarity and forthright transparency. It is imperative that you elucidate your position and conduct amidst these complex interactions, as the implications of this orchestrated push towards your assessment are deeply concerning and necessitate a comprehensive understanding of the motives and integrity underlying these actions.

I believe that by meticulously addressing and substantiating these allegations in a comprehensive manner, we can illuminate the fallacies underpinning your conclusions and forge a clearer path toward rectifying the harm inflicted upon my family.

Should you require any clarification or documentation concerning the points addressed in this communication, I am prepared to provide further evidence in accordance with applicable legal and ethical standards.

Mario Neal