

**NOT FOR PUBLICATION WITHOUT THE
APPROVAL OF THE APPELLATE DIVISION**

This opinion shall not "constitute precedent or be binding upon any court." Although it is posted on the internet, this opinion is binding only on the parties in the case and its use in other cases is limited. R. 1:36-3.

**SUPERIOR COURT OF NEW JERSEY
APPELLATE DIVISION
DOCKET NO. A-1022-20**

MAHNAZ FARZAN, a/k/a
MAHNAZ KEYVANJAH
MONIFAR,

Plaintiff-Respondent,

v.

REZA FARZAN,

Defendant-Appellant.

Argued October 12, 2022 – Decided November 4, 2022

Before Judges Accurso and Vernoia.

On appeal from the Superior Court of New Jersey,
Chancery Division, Family Part, Monmouth County,
Docket No. FM-13-0676-05.

Reza Farzan, appellant, argued the cause pro se.

Respondent has not filed a brief.

PER CURIAM

Plaintiff Mahnaz Farzan and defendant Reza Farzan were married in 1988 and divorced in 2009 when their son was twenty and their daughter fifteen years old. Plaintiff, however, obtained a final restraining order against defendant in 2004,¹ and the parties lived separate and apart since that time.

In their marital settlement agreement incorporated into their judgment of divorce, the parties agreed to share joint legal custody of their daughter, with plaintiff to have residential custody. Their son was by that time attending college in New Jersey and living near campus. The parties agreed defendant would pay child support to plaintiff of \$9,880.00 per year, payable weekly for the parties' daughter. Defendant also agreed to pay plaintiff, through probation via wage garnishment, permanent alimony of \$38,000 annually, which the parties agreed would terminate on plaintiff's remarriage, regardless of whether such marriage was void or voidable.

Defendant was unemployed and had filed for bankruptcy at the time of the divorce. The parties agreed defendant would deed plaintiff his share of the marital residence in Middletown and he would have no further obligation for

¹ Defendant appealed the order, but the appeal was dismissed without prejudice in 2006 on the filing of his bankruptcy petition. Farzan v. Farzan, No. A-1454-04 (App. Div. June 15, 2006). We denied defendant's 2019 motion to vacate the dismissal and reinstate the appeal. Defendant finally succeeded in getting the order dismissed in July 2021.

any mortgage on the property. The parties also agreed plaintiff had incurred approximately \$24,630 in uncovered medical bills and other expenses pendente lite, which defendant agreed to reimburse on presentation of the invoices to confirm they were incurred post-complaint. Finally, the parties agreed they would divide equally defendant's retirement and brokerage accounts by qualified domestic relations order (QDRO), at then current values.

The entry of the judgment of divorce, however, did not end the litigation between the parties. Defendant filed multiple post-judgment motions on a host of different issues, including to compel plaintiff to contribute to their son's college expenses and to reduce or eliminate child support for their daughter. His motions were often met by cross-motions with plaintiff claiming to be unemployed and destitute due to defendant's failure to meet his support obligations. Plaintiff also filed several motions herself, through counsel who had represented her in the divorce, most often in aid of litigant's rights to compel defendant to comply with his support obligations and prior orders for counsel fees. We have decided three post-judgment appeals by defendant since 2010 and dismissed two others, one as interlocutory and another as

moot.² Defendant has alleged since at least 2016 that plaintiff, contrary to her many representations, lived in California and not at the former marital home in Middletown.

In 2019, defendant mustered proof that plaintiff had married a man in California immediately after the parties' divorce in 2009. Defendant filed a "motion to vitiate" all orders and judgments involving the parties dating back to the final restraining order in 2004, listing thirty-five specific items of relief ranging from vacating all prior alimony and child support orders to finding plaintiff and her counsel had committed fraud and theft and requesting they be reported to the county prosecutor and the FBI. Defendant contended the parties' son and daughter had been emotionally damaged by plaintiff's many misrepresentations to the court, as had he, and that he had been falsely arrested on several occasions for failure to pay alimony he didn't owe, and that plaintiff should pay compensatory and punitive damages to all of them.

Judge Acquaviva treated the motion as one brought pursuant to Rule 4:50-1(c) based on plaintiff's alleged fraud. In an August 26, 2019 order, the

² The prior appeals are as follows: Farzan v. Farzan, No. A-1363-10 (App. Div. Oct. 26, 2011); Farzan v. Farzan, No. A-0560-12 (App. Div. Sept. 30, 2013), certif. denied 217 N.J. 292 (2014); Farzan v. Farzan, No. A-0096-15 (App. Div. June 30, 2017); Farzan v. Farzan, No. A-5233-15 (Oct. 11, 2016); and Farzan v. Farzan, No. A-0412-19 (App. Div. Mar. 18, 2022).

judge terminated defendant's alimony obligation and immediately ended any enforcement of that obligation based on a copy of the complaint plaintiff filed in California against her second husband in which she alleged the two had married shortly after the parties' divorce in 2009. The judge also established a date for a plenary hearing to determine the effective date of the termination of defendant's alimony obligation. The judge denied defendant's thirty-two other requests for relief, many, such as those seeking relief and damages against plaintiff and her former counsel, without prejudice.

Following the plenary hearing, Judge Acquaviva entered an order on October 4, 2019, terminating defendant's alimony obligation retroactive to August 11, 2009, the date plaintiff testified she remarried, ordering probation to provide an updated accounting of the parties' accounts and scheduling an "ability to pay" hearing to assess plaintiff's means of satisfying the judgment to be entered against her.

Plaintiff responded with a motion to enforce litigant's rights with thirty-eight items of relief, all geared to reducing defendant's overpayment of alimony since her remarriage. Defendant filed a cross-motion to plaintiff's motion requesting the court rule on an additional sixteen specific requests for relief. The judge subsequently entered a sua sponte order directing the joinder

of the parties' daughter as an indispensable party pursuant to Rule 4:29-1(b), based on plaintiff's alleged fraudulent conveyance in having transferred the former marital home to her for one dollar following the court's order retroactively terminating defendant's alimony. The judge subsequently vacated that order on plaintiff's proof the property had been transferred back to her by the parties' daughter.³

Following argument on the motions, Judge Acquaviva entered an order on April 27, 2020, accompanied by a lengthy statement of reasons addressing every request for relief the parties made. Sorting through their fifteen-year history of charges and countercharges, the Judge determined defendant had overpaid alimony to plaintiff in the sum of \$188,566.46. The judge denied plaintiff's request that the sum be reduced by the \$24,630 in pendente lite arrears reserved in the judgment of divorce, finding plaintiff had never previously submitted the invoices for defendant's review as agreed, and the documents she submitted on the motion to support the charges were unclear and incomplete. While acknowledging that enforcement of the obligation would have at one point been appropriate on a proper application to permit

³ The home was destroyed by a fire shortly after the parties' daughter deeded the property back to plaintiff. The parties' son was arrested on arson charges.

defendant to review the invoices, the judge found plaintiff's decade long delay in resolving her pendente lite claim was inexcusable and the prejudice to defendant patent and refused the offset.

The judge did, however, allow an offset for plaintiff's share of defendant's three Ameritrade accounts for which defendant never signed authorizations as he was ordered to do on a post-judgment application in 2014, after a different judge found him in violation of litigant's rights. Employing the approximate values of the accounts included in the property settlement agreement, the judge determined plaintiff's fifty percent share was \$10,722, and that sum would be subtracted from the \$188,566.46 in overpaid alimony. The judge also allowed plaintiff to deduct child support arrears from several sources totaling \$15,668.17, unreimbursed medical expenses for both children of \$301.95, and an outstanding counsel fee award of \$5,199.75. The judge denied defendant's request to vacate prior child support orders. Accordingly, the judge entered judgment for defendant in the sum of \$156,674.59.

Both parties moved for reconsideration. Judge Acquaviva again painstakingly reviewed plaintiff's thirteen points on reconsideration and defendant's seventeen points, denying all as explained in his twenty-nine-page statement of reasons attached to his August 3, 2020 order. As pertinent to this

appeal, the judge rejected defendant's argument that he'd executed all the authorizations for division of the retirement and brokerage accounts in 2009, finding he'd not provided proof of having done so nor any proof the amounts in dispute had been disbursed via QDRO. The judge also noted defendant offered no explanation of why he would have been found in violation of litigant's rights for having failed to sign authorizations for three of the five accounts in 2014 if he executed all five authorizations in 2009. Because the judge determined to address the delayed equitable distribution of the three accounts by credit against defendant's overpaid alimony, however, he vacated the prior order finding defendant in violation of litigant's rights for failing to execute the three authorizations. Although denying defendant monetary relief, the judge agreed with defendant that plaintiff's failure to disclose her re-marriage while accepting alimony could be considered theft by deception and determined to make a referral to the Monmouth County Prosecutor's Office for its consideration.

Plaintiff thereafter filed a further request for reconsideration of the court's April 27 order, styled as a Rule 4:50 motion, which defendant opposed and also sought a downward adjustment in the 2009 value of his IRA, valued at \$15,000 in the April 27, 2020 order. In an order entered September 21,

2020, the court denied all relief to plaintiff and likewise rejected defendant's request to adjust the value of the IRA. First, the court found defendant's request procedurally improper as it was raised in his opposition papers and not by way of a properly noticed motion. Second, the court found the 2009 statement on which defendant relied reporting the value of the IRA as \$2,321.25 instead of \$15,000, had been in his actual or constructive possession for over a decade. Because defendant had failed to correct the parties' estimated value of the accounts listed in their marital settlement agreement with information clearly at his disposal on the prior motion or in the ten years preceding it, the court found he could not do so now in an effort to increase the judgment previously awarded him.

Defendant appeals from four orders, the August 26, 2019 order as well as the orders entered on April 27, August 3, and September 21, 2020, raising sixty-nine alleged errors for our consideration as follows:

ERROR # 1 - 8/26/19 No 2 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO VITIATE ALL JUDGMENTS SINCE THE BEGINNIG OF THIS DIVORCE (10/11/2004).

ERROR # 2 - ON 8/26/19 No 3 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO VITIATE ALL

ORDERS SINCE THE BEGINNING OF THIS
DIVORCE (10/11/2004).

ERROR # 3 - ON 8/26/19 No 4 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO VACATE ALL
ARREARAGES IN PROBATION DIVISION.

ERROR # 4 - ON 8/26/19 No 5 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO VACATE ALL
CHILD SUPPORT ORDERS IN MY CASE.

ERROR # 5 - ON 8/26/19 No 7 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO REIMBURSE ME
FOR EVERYTHING I PAID TO RESPONDENT
BETWEEN 2004 AND 2009.

ERROR # 6 - ON 8/26/19 No 8 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO RETURN THE
MARITAL HOME IN MIDDLETOWN NJ TO ME.

ERROR # 7 - ON 8/26/19 No 9 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO VACATE THE FRO
AT THE TIME.

ERROR # 8 - ON 8/26/19 No 10 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO REPORT
ATTORNEY ABRAMS FOR REPRESENTING MY
DAUGHTER WITHOUT PROPER
CRENDENTIALS.

ERROR # 9 - ON 8/26/19 No 11 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN

DENYING MY REQUEST TO FIND ATTORNEY ABRAMS FOR COMMITTING EXTORTIONS AND REFERING HIM TO COUNTY PROSECUTOR.

ERROR # 10 - ON 8/26/19 No 12 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO COMPELL ATTORNEY ABRAMS TO REFUND ME FOR ALL THE FUNDS HE RECEIVED FROM RESPONDENT.

ERROR # 11 - ON 8/26/19 No 13 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE RESPONDENT AND HER ATTORNEY (ABRAMS) OR RESPONDENT ALONE COMMITTED OBSTRUCTION OF JUSTICE.

ERROR # 12 - ON 8/26/19 No 15 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO COMPELL THE LAW FIRM OF ROBERT ABRAMS TO PRODUCE THE NAMES OF THEIR BUSINESS INSURERS.

ERROR # 13 - ON 8/26/19 No 16 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO REPORT RESPONDENT AND HER ATTORNEY TO COUNTY PROSECUTOR THEN.

ERROR # 14 - ON 8/26/19 No 17 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO REPORT RESPONDENT AND HER ATTORNEY TO FBI.

ERROR # 15 - ON 8/26/19 No 18 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO COMPELL

[RESPONDENT] TO PAY PAIN AND SUFFERING DAMAGES TO MY KIDS.

ERROR # 16 - ON 8/26/19 No 19 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO COMPELL RESPONDENT TO PAY PUNITIVE DAMAGES TO OUR SON AND DAUGHTER.

ERROR # 17 - ON 8/26/19 No 20 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO PAY PAIN AND SUFFERING DAMAGES TO ME.

ERROR # 18 - ON 8/26/19 No 21 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO COMPELL RESPONDENT TO PAY PUNITIVE DAMAGES TO ME.

ERROR # 19 - ON 8/26/19 No 22 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO COMPELL REPONDENT TO PAY ME FOR FALSE IMPRISONMENT.

ERROR # 20 - ON 8/26/19 No 23 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPODENT COMIITED FRAUD FROM THE DAY SHE FILED FOR TRO (10/13/2004).

ERROR # 21 - ON 8/26/19 No 24 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS COMMITTED THEFT BY FRAUD.

ERROR # 22 - ON 8/26/19 No 25 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ROBERT ABRAMS COMMITTED THEFT BY DECEPTION.

ERROR # 23 - ON 8/26/19 No 26 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS COMMITTED DEFAMATION OF CHARACTER AGAINST ME.

ERROR # 24 - ON 8/26/19 No 27 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS TORTURED DAUGHTER BY LEAVING HER IN A BIG HOUSE WHEN SHE WAS 13 ALL BY HERSELF.

ERROR # 25 - ON 8/26/19 No 28 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS COMMITTED FALSE IMPRISONMENT BY LEAVING DAUGHTER IN A BIG HOUSE WHEN SHE WAS 13 ALL BY HERSELF.

ERROR # 26 - ON 8/26/19 No 29 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS COMMITTED CRUELTY TO ME AND MY CHILDREN.

ERROR # 27 - ON 8/26/19 No 30 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS COMMITTED WILFUL CHILD CRUELTY TO OUR DAUGHTER.

ERROR # 28 - ON 8/26/19 No 31 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS COMMITTED FRAUD.

ERROR # 29 - ON 8/26/19 No 32 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS COMMITTED FALSIFICATION ON OFFICIAL COURT DOCUMENTS.

ERROR # 30 - ON 8/26/19 No 33 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DECLARE THAT RESPONDENT AND ABRAMS COMMITTED FALSE SWEARINGS ON OFFICIAL COURT DOCUMENTS.

ERROR # 31 - ON 8/26/19 No 34 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO ORDER RESPONDENT TO PRODUCE A LIST OF HER ASSETS WITHIN TEN DAYS.

ERROR # 32 - ON 8/26/19 No 35 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST FOR JURY TRIALS FOR HER CIVIL AND CRIMINAL VIOLATIONS IN THIS CASE.

ERROR # 33 - ON 4/27/20 No 1 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN HOLDING ME IN VIOLATION OF LITIGANT'S RIGHTS IN PART.

ERROR # 34 - ON 4/27/20 No 6 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DIRECTING ME TO SIGN FIVE AMERITRADE FORMS WITHOUT PROVIDING THE FORMS TO ME.

ERROR # 35 - ON 4/27/20 No 7 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN AWARDING TO RESPONENT HALF OF THE VALUE OF FIVE AMERITRADE ACCOUNTS.

ERROR # 36 - ON 4/27/20 No 9 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN AWARDING TO RESPONENT HALF OF THE VALUE OF FIVE AMERITRADE ACCOUNTS.

ERROR # 37 - ON 4/27/20 No 13 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT REQUEST TO OVERRULE JUDGE COYLE FOR MODIFICATION OF CHILD SUPPORT.

ERROR # 38 - ON 4/27/20 No 14 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT REQUEST TO OVERRULE JUDGE COYLE FOR MODIFICATION OF CHILD SUPPORT.

ERROR # 39 - ON 4/27/20 No 27 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT MEDICAL EXPENSES FOR \$152.50.

ERROR # 40 - ON 4/27/20 No 28 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT MEDICAL EXPENSES FOR \$1785.

ERROR # 41 - ON 4/27/20 No 29 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT MEDICAL EXPENSES FOR \$1785.

ERROR # 42 - ON 4/27/20 No 30 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT MEDICAL EXPENSE FOR \$250.

ERROR # 43 - ON 4/27/20 No 31 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT MEDICAL EXPENSE FOR \$3995.

ERROR # 44 - ON 4/27/20 No 32 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT MEDICAL EXPENSE FOR \$3995.

ERROR # 45 - ON 4/27/20 No 36 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN GRANTING RESPONDENT ATTORNEY FEES FOR \$5199.75.

ERROR # 46 - ON 4/27/20 No 38 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO DENY RESPONDENT CIS FILED ON 12/13/2019 IN ITS ENTIRETY.

ERROR # 47 - ON 4/27/20 No 39 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO RECALCULATE CHILD SUPPORT.

ERROR # 48 - ON 4/27/20 No 40 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN

DENYING MY REQUEST TO GRANT
DISCOVERY ABOUT MY DAUGHTER'S
SITUATION IN NJ.

ERROR # 49 - ON 4/27/20 No 41 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO GRANT
DISCOVERY ABOUT HER FINANCIAL
CONDITIONS.

ERROR # 50 - ON 4/27/20 No 42 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO SUBPOENA
RESPONDENT'S TAX RETURNS.

ERROR # 51 - ON 4/27/20 No 43 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO SUBPOENA
RESPONDENT'S CELL TOWERS RECORD.

ERROR # 52 - ON 4/27/20 No 44 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO GET
RESPONDENT'S MAILING ADDRESS FOR
COURT CORRESPONDENCE.

ERROR # 53 - ON 4/27/20 No 52 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO FIND RESPONDENT
IN COURT CONTEMPT.

ERROR # 54 - ON 4/27/20 No 53 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
ORDERING THE PROBATION DIVISION TO
AJJUST THE NUMBERS INCORRECTLY.

ERROR # 55 - ON 4/27/20 No 56 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN

SUBTRACTING FROM THE ALIMONY THAT RESPONDENT OWED ME.

ERROR # 56 - ON 8/3/20 No 17 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO VITIATE ALL JUDGMENTS FROM 4/13/2004 THROUGH 4/22/2019.

ERROR # 57 - ON 8/3/20 No 18 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO VITIATE ALL ORDERS FROM 4/13/2004 THROUGH 4/22/2019.

ERROR # 58 - ON 8/3/20 No 19 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO VACATE THE DIVORCE PSA.

ERROR # 59 - ON 8/3/20 No 20 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO GET PAID FOR ALL THE MONEY THAT I PAID TO RESPONDENT FROM 10/13/2004 TO 8/11/2009.

ERROR # 60 - ON 8/3/20 No 22 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO ORDER RESPONDENT TO PAY ME \$22,863.95.

ERROR # 61 - ON 8/3/20 No 23 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST FOR RESPONDENT TO PRODUCE ROBERT ABRAMS FOR ALLEGED COUNSEL FEES.

ERROR # 62 - ON 8/3/20 No 24 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN

DENYING MY REQUEST FOR COURT TO
ENFORCE MY 14TH AMENDMENT RIGHTS.

ERROR # 63 - ON 8/3/20 No 25 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO FILE A COMPLAINT
IN FAMILY COURT FOR CHILD SUPPORT
FRAUD.

ERROR # 64 - ON 8/3/20 No 26 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO CHARGE
COMPOUNDING INTEREST FROM THE DAY
EACH ALIMONY PAYMENT WAS MADE.

ERROR # 65 - ON 8/3/20 No 27 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO APPLY THE
NEWBURGH FACTORS TO NEW UNCOVERED
FACTS FOR CHILD SUPPORT.

ERROR # 66 - ON 8/3/20 No 28 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST TO REMOVE
DUPLICATE EXPENDITURE FOR CHILD
SUPPORT.

ERROR # 67 - ON 8/3/20 No 29 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST FOR RESPONDENT TO
PRODUCE SUBSCRIBING WITNESS FOR FAKE
BILLS AND RECEIPTS THAT SHE SUBMITTED
TO FAMILY COURT.

ERROR # 68 - ON 8/3/20 No 30 - THE TRIAL
COURT COMMITTED REVERSIBLE ERROR IN
DENYING MY REQUEST FOR COURT TO GRANT
A JURY TRIAL.

ERROR # 69 - ON 9/21/20 No 7 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO ADJUST THE VALUE OF MY IRA ACCOUNT.

Defendant raises four additional errors not attributable to any of the four orders appealed. They are:

ERROR # I - ON 2/12/2020 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO ORDER RESPONDENT TO MAIL ME HER COURT PAPERS DIRECTLY.

ERROR # II ON 10/4/2019 MONMOUTH COUNTY PROBATION DIVISION COMMITTED REVERABLE ERROR IN DENYING MY REQUEST TO USE IRS TOPIC 152.

ERROR III - ON 2/12/2020 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO GIVE ME CREDIT FOR \$7800.

ERROR # IV - ON 4/27/2020 - THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN DENYING MY REQUEST TO GIVE ME CREDIT FOR \$7500 FOR HALF OF RESPONDENT'S IRA ACCOUNT.

Having reviewed the record, we find none of these arguments has sufficient merit to warrant discussion in a written opinion. See R. 2:11-3(e)(1)(E).

Although we can appreciate defendant's fury at paying nearly \$200,000 in alimony over a decade owing to plaintiff's fraud, the court did not err in reducing the funds owed to him by his own outstanding arrears and judgments

for equitable distribution, unpaid child support, the children's unreimbursed medical expenses and legal fees. As Judge Acquaviva repeatedly explained to defendant, there is no authority for the "vitiation of all prior orders" entered in this long-running matrimonial dispute, notwithstanding plaintiff's fraud.

The court carefully ascertained both the amount defendant had overpaid in alimony and the sums he owed plaintiff for unpaid equitable distribution, child support, unreimbursed medical expenses and counsel fee awards, some of which he'd been ordered to pay after having been found to be in violation of litigant's rights for his failure to comply with prior orders. As Judge Acquaviva found, these parties have engaged in protracted litigation for nearly twenty years. Against plaintiff's "undisputed failure to disclose her re-marriage" is a well-documented series of defendant's failures to comply with court orders. The judge carefully and painstakingly waded through all of the parties' many poorly supported allegations and counter-allegations, determining the amount defendant had overpaid in alimony and the offsets to which plaintiff was entitled by prior orders and the audit conducted of the parties' account by Probation.

Having reviewed this voluminous record, we are satisfied the court fairly resolved the myriad of issues before it and did not abuse its considerable

discretion in entering any of the orders challenged. Defendant has simply given us no reason to second-guess the court's careful determinations made in this matter.⁴ See Hand v. Hand, 391 N.J. Super. 102, 111-12 (App. Div. 2007). We affirm the orders under review substantially for the reasons expressed by Judge Acquaviva in his sound and well-reasoned statements of reasons accompanying the orders.

Affirmed.

I hereby certify that the foregoing
is a true copy of the original on
file in my office.



CLERK OF THE APPELLATE DIVISION

⁴ As is evident from a review of defendant's long list of alleged errors, many of his claims arise out of causes of action not cognizable in this post-judgment Family matter. Those claims the judge denied without prejudice, permitting defendant to pursue them, should he choose, in the appropriate forum.