

Revelations about Alan T. Chan, Part 9

Portrait of a Family Court Protégé (of Judge Jane Gallina-Mecca)



[DR. BANDY LEE](#)

JUL 30, 2025

Psychopathy has become an affliction in society that the public can no longer ignore. The diagnosis of serial rapists and mass murderers, it has ominously infiltrated not just ordinary society but even corridors of power. I mentioned earlier that the famed psychopathy expert, Dr. Michael Stone, instantly diagnosed Alan T. Chan (psychopathy does not require a personal interview; in fact, some studies show that its charm, captivating mask, and psychological manipulation make evaluations *less* accurate with a personal interview—instead, one relies on observed actions, objective records, and collateral, victim reports). Indeed, Alan T. Chan deceived me for twelve years, as he lamented his marital difficulties with me over the phone—but behind my back he used my emotional support to spread the rumor that my sister was “mentally ill” and that his “famous Yale psychiatrist” sister-in-law agreed with him! He invited me into his home in April 2020, no doubt to recruit me as a “patron”. Psychopaths recruit “patrons and pawns” to buttress their delusions. Unfortunately for Alan T. Chan, it took but ten days of in-person observation for me to see the truth. While I would not score the Hare psychopathy Checklist for another seventeen months, I already diagnosed him—even shared with him my diagnosis—in a little more than a month’s time. Dr. Stone was so impressed, he wrote: “I think it will help ... that you, as an esteemed and world-traveled forensic psychiatrist, came up with the same Hare-score as I did. One feels like saying, ‘Tell *that* to the judge!’” Well, for an ordinary Judge that is a “slam dunk,” but not for Judge Gallina-Mecca: for her, it was a signal to ramp up assaults, banning of experts, retaliation against witnesses, and the total separation of Patricia Lee from her children.

Since Judge Gallina-Mecca’s courtroom bans, threatens, and retaliates against experts—while elevating her own coterie of poorly-trained and poorly-qualified “experts”—some damning expert reports will be exhibited here. Below is a glimpse of my own diagnosis (there is nothing that says one cannot diagnose a family member, as long as proper procedure is followed). Dr. Stone’s and my diagnosis, furthermore, would be upheld twice in peer reviews and Alan T. Chan’s dangerousness confirmed through four other reports, which can be partially found at the web site: alantchan.com.

Hare Psychopathy Checklist Revised

		0 (definitely not present)	1 (somewhat present)	2 (definitely present)
1	Glibness/superficial charm			✓
2	Egocentricity/grandiose sense of self-worth			✓
3	Proneness to boredom/low frustration tolerance		✓	
4	Pathological lying and deception			✓
5	Conning/lack of sincerity			✓
6	Lack of remorse or guilt			✓
7	Lack of affect and emotional depth			✓
8	Callous/lack of empathy			✓
9	Parasitic lifestyle			✓
10	Short-tempered/poor behavioral controls			✓
11	History of promiscuous sexual relations			✓
12	History of early behavior problems		✓	
13	Lack of realistic, long-term plans			✓
14	Impulsivity		✓	
15	Irresponsible behavior			✓
16	Frequent marital relationships		✓	
17	History of juvenile delinquency	✓		
18	Revocation of conditional release	✓		
19	Failure to accept responsibility for own actions			✓
20	Many types of offense	✓		
Total number of points				

Score for Alan Chan (DOB 4/5/1970): 30

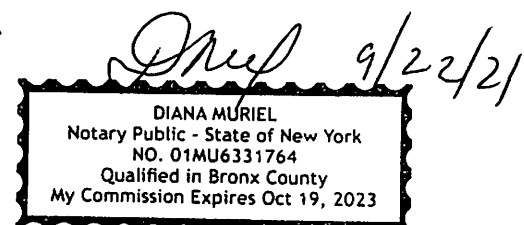
Administering forensic psychiatrist: Bandy Lee, M.D.

Date of first diagnosis: 5/20/2020 (shared with Mr. Chan)

Date of last diagnosis: 9/22/2021

Signed on this day of 9/22/2021:

Bandy Lee



Evaluator Qualifications

I, Bandy Lee, M.D., M.Div., am a physician, psychiatrist, and violence expert with over two decades of experience evaluating, treating, and designing programs for violent offenders. My education was at Yale School of Medicine and Yale Divinity School, with internship in internal medicine at Bellevue Hospital (1996), residency in psychiatry at Massachusetts General Hospital (1999), and a joint fellowship in medical anthropology at the Harvard Medical School Department of Social Medicine and at the National Institute of Mental Health (2002). My experience in correctional psychiatry includes providing clinical services at a number of maximum-security prisons, serving as an expert witness for the criminal courts, developing research-based models for prison reform, and helping to design community violence reduction programs. In 2013, I played a key role in initiating reforms at Rikers Island Correctional Facility when I wrote an expert report for the New York City Board of Corrections that helped launch a federal investigation. Since then, I have been consulting with five different states on prison reform, including in Alabama, California, Connecticut, Massachusetts, and New York, as well as internationally, in Ireland and France. As Director of Research for Harvard's Center for the Study of Violence, I evaluated a violence prevention project in San Francisco that won the Ash Institute Award (the "Oscar" of government programs), was replicated in the U.K., Poland, New Zealand, Singapore, and Mexico, and is now being adopted as an alternative to solitary confinement around the U.S.

In 2002, I was among two American psychiatrists invited to consult with the Violence and Injury Prevention Department of the World Health Organization (WHO) to help launch the landmark *World Report on Violence and Health*, which began a new era of responding to violence through scholarship and prevention. In 2007, I helped coauthor the United Nations (UN) Secretary General's chapter on "Violence Against Children." In 2011, I became a project leader for the WHO Violence Prevention Alliance (VPA), participating with the United Nations Office on Drugs and Crime (UNODC) and the United Nations Development Programme (UNDP) in the launch of the 2014 *Global Status Report on Violence Prevention*, which documented the laws, programs, police reforms, and widespread services that 133 countries implemented to bring about a reduction in global homicides by 16 percent in 12 years.

From 2003 to 2020, I was a faculty member of the Yale School of Medicine's Law and Psychiatry Division, and the courses I taught at Yale Law School include "Immigration Legal Services," "Prison Clinic," "Criminal Justice Clinic," and "Veterans Legal Services." I also taught Yale College courses such as, "Causes and Cures of Violence" and "Violent States and Creative States," and the Yale School of Public Health course, "Global Violence and Public Health." Recently, I have taught, "Rethinking Violence: The Role of Religion, Spirituality, and Creativity" at Union Theological Seminary. I supervised law students in clinical interviewing, and forensic psychiatry fellows in developing expert reports for the courts. Psychopathy, severe personality disorders, posttraumatic stress disorder, and specific cultural manifestations of depression and anxiety are my areas of specialty. I have written over 100 peer-reviewed articles and chapters, edited 17 scholarly books and journal special issues, and authored the textbook, *Violence: An Interdisciplinary Approach to Causes, Consequences, and Cures*. Since 2021, my academic affiliations have changed to Harvard Medical School and Columbia University, upon an invitation to cofound a Violence Prevention Institute at Union Theological Seminary with other luminaries in the field.

BARRY H. ROTH, MD

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jurisprudential practices, as is my practice as a forensic psychiatrist. Ultimately, the lens through which I view the entirety is the more than half century of my knowledge, education, training, and experience.

I make the following statements with a reasonable degree of medical certainty on the basis of currently available information, reserving my right to amend my opinions in the face of new information.

Dr. Lee and Dr. Stone made conclusions, working independently and professionally, founded in their Expert Psychiatric and Forensic Psychiatric specialized knowledge, that Mr. Chan is a danger to his children. The Family Court, through acts of omission and acts of commission, including but not limited to process, proceedings, decisions, and orders, has exposed Ms. Patricia Lee and her children, Mirabelle Chan and Blake Chan, to torture by way of placing her children with Mr. Chan.

My expert and authoritative opinion that these experiences constitute torture include, but are not limited to, Usual and Customary Standards of psychiatric and forensic psychiatric evaluation and treatment, including medical findings, as enumerated:

STATEMENTS

1. Psychiatric clinical expertise is the foundation to qualify a forensic psychiatric expert and expertise on the basis of that knowledge, education, skill, training, and experience. I have more than a half century of such expertise and five active American Board of medical specialty certifications.
2. It is the established and designated professional requirement, standard, and labeled content for examination and certification of the forensic psychiatric expert to know about the interface of psychiatry and the law. The forensic psychiatric expert practices medicine and knows better than to opine upon matters outside of her/his expertise, i.e., knows better than to try to practice law. Similarly, the legal professional knows to consult medical experts as called upon by the situation.
3. A psychiatrist is bound to competency in cultural matters, and as it pertains most particularly to this instant case, structural racism, structural sexism, structural abuse and mistreatment and torture of children, structural discrimination against disabled persons, and other structural violence as discovered.
4. The expectation, moreover, the requirement, that the sitting bench not practice medicine, outside of her expertise, is only substantive due process. Basic common sense. You do not need to be a doctor to know that. But you do need to be a doctor to have medical expertise. You do need to be a forensic psychiatric expert to have forensic psychiatric expertise.

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5. FREⁱ's & Landmark cases^{ii, 2}
6. It is the business of the forensic psychiatric expert to the best of his or her capacity to ferret out the truth and to tell the truth, even to speak inconvenient truths.
7. I, having used standard operating procedure, usual and customary tools in my profession, by a preponderance of the evidence, to a reasonable degree of medical certainty assuming until proven otherwise, have come to said conclusions. Black letter³ laws of NJRE⁴ and

² My contract of such commanding gravamen

Expert Witness Retention Contract

Duties of Firm.

Where circumstances reasonably allow, providing Expert with prompt notice of any *Daubert* motions, *Frye* motions, motions in limine, or other pre-trial motions made by other parties or persons to restrict, exclude or in any way limit Expert's testimony or Expert's participation in the underlying legal matter.

Obtaining Expert's advance approval (for accuracy) of the relevant portions of any and all answers to interrogatories, motions, expert designations or other documents which summarize Expert's qualifications, methodology, opinion(s), and/or anticipated testimony.

[Emphasis in original]

3

<https://www.oxfordreference.com/view/10.1093/oi/authority.20110803095510675>

black-letter law

The known and accepted principles of law set down and established, either in legislation or case law, and ascertainable from printed sources. The established, uncontested body of law...

https://www.law.cornell.edu/wex/blackletter_law

blackletter law

In [common law](#) legal structures, blackletter laws are the well-established [legal rules](#) that are certain and no longer disputable. Blackletter law is free from doubt and generally well-known. It also means well-established [case law](#) and refers to the basic key components of a subject in the law.

<https://www.lawnow.org/black-letter-law/>

Black-letter law refers to the concept that rules are generally well-known and free from doubt or dispute.

<https://lawyer.zone/black-letter-law/>

"Black Letter Law" refers to legal principles and doctrines that are widely known and accepted.

<https://definitions.uslegal.com/b/black-letter-law/>

Black Letter Law refers to the basic standard elements or principles of law, which are generally known and free from doubt or dispute. It describes the basic principles of law...In American legal system it also means mean well-established case law.

<https://legal-dictionary.thefreedictionary.com/Black+Letter+Law>

Black Letter Law

A term used to describe basic principles of law that are accepted by a majority of judges in most states.

The term probably derives from the practice of publishers of encyclopedias and legal treatises to highlight principles of law by printing them in boldface type.

West's Encyclopedia of American Law, edition 2. Copyright 2008 The Gale Group, Inc. All rights reserved.

⁴ NJRE 702-705

New Jersey Rules of Evidence Article VII. Opinions and Expert Testimony

N.J.R.E. 702. Testimony by Expert Witnesses

If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education may testify in the form of an opinion or otherwise.

N.J.R.E. 703. Bases of Opinion Testimony by Experts

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FRE⁵ are dispositive for expert testimonies of each or both Expert Witnesses Drs. Bandy Lee⁶ and Michael Stone⁷ Testimony(ies) and the Bases of each or both of their Expert Opinion Testimony(ies) .

8. Drs. Lee and Stone had, at relevant times, and continue to have, knowledge, skill, experience, training, and education to make such statements and the like, as Psychiatric or Forensic Psychiatric Experts.
9. Both professionals attempted to testify and to proffer expert written opinions, and otherwise.
10. The court rejected Expert medical findings by two world renowned experts^{8,9} working independently.
11. The court refused to consider their attempts to make expert communications, based in medical findings.
12. Dr. Lee and Dr. Stone attempted to inform the court that their findings and opinions were matters of the highest importance: vital, critical, urgent, and with fatal potential, or at the least of unacceptable clinical risk of irreparable and permanent physical and mental health.
13. Their communications were reports of dangerousness and abuse as mandated reporters.
14. These Experts' medical findings concerned a sister, niece, and nephew of an Eyewitness, Treating Physician, and Forensic Expert (Dr. Lee); those of a Treating Physician and Forensic Expert (Dr. Stone)
15. Dr. Lee's and Dr. Stone's opinions and otherwise were founded in their Expert Psychiatric and Forensic Psychiatric specialized knowledge --- terms of art, assessment of subjective and objective data, formulation, plans for remediation, and so forth, not within the ken of laypeople (e.g., jurists) --- prima facie would be helpful and necessary for any trier of fact to understand evidence or to determine medical and mental health facts at issue regarding the marriage of Patricia Lee and Alan Chan, and the product of their union [instant "Family Court Litigation"].
16. Dr. Lee's and Dr. Stone' Expert Opinions on Facts at issue in This Family Court Litigation are based on sufficient facts and data.
17. Dr. Lee's and Dr. Stone's Expert Opinions on Facts at issue in This Family Court Litigation are products of reliable principles and methods.
18. Dr. Lee's and Dr. Stone's Expert Opinions on Facts at issue in This Family Court Litigation have reliably applied the principles and methods to the facts of the case.

The facts or data in the particular case upon which an expert bases an opinion or inference may be those perceived by or made known to the expert at or before the proceeding. If of a type reasonably relied upon by experts in the particular field in

forming opinions or inferences upon the subject, the facts or data need not be admissible in evidence.

<https://www.njcourts.gov/attorneys/assets/evidence/evidence7.pdf?c=SVS> 22-3-22 1332pm

⁵ FRE 702-705

⁶ CV & summary

⁷ CV

⁸ Question of contempt

⁹ Gag and prohibition of contact to treating physician

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19. To reiterate, in summary, Dr. Lee's and Dr. Stone's Expert Opinions on Facts in issue In This Family Court Litigation have reliable foundation.
20. Expert Opinions on Facts at issue in this Family Court Litigation are relevant to assist the trier of fact to understand the evidence and/or to determine a fact in issue.
21. The underlying reasoning and methodology of Dr. Lee's and Dr. Stone's Expert Opinions on Facts at issue in This Family Court Litigation is scientifically valid and properly can be applied to the Facts at issue in This Family Court Litigation.
22. Dr. Lee and Dr. Stone are Certified qualified to administer and score The Hare PCL-R. They did so. The Hare PCL-R and has been tested.
23. The Hare PCL-R and has been subjected to peer review and publication.
24. The Hare PCL-R and has known error rates.
25. Standards controlling operation of the Hare PCL-R exist.
26. The Hare PCL-R has maintained standards controlling its operation.
27. The Hare PCL-R has attracted widespread acceptance within the Expert Mental Health, Psychology, and Forensic Expert Psychiatry communities
28. That Judicial evidentiary "gatekeeping" is to be flexible is black letter law.
29. That the focus of Judicial evidentiary decisions must be solely on principles and methodology is black letter law.
30. Abuse of discretion is the proper standard by which to review a district court's decision to admit or exclude Forensic Psychiatric Expert testimony evidence.
31. General Electric Co. v. Joiner 522 US 136 (1997) Nothing...requires a district court to admit opinion evidence that is connected to existing data only by the *ipse dixit* of the expert.¹⁰
32. Eyewitness, next of kin, treating physician, and world renowned forensic psychiatric expert, Dr. Lee may base her opinions on facts or data in the case that she has been made aware of or personally observed, which other experts in Psychiatry and Forensic Psychiatry would reasonably consider (sometime parlance and usage, "rely upon") those kinds of facts or data in forming their opinions.
33. Treating physician, World Renowned Psychiatric Expert, Dr. Stone may base his opinions on facts or data in the case that he has been made aware of or personally observed, which other experts in Psychiatry and Forensic Psychiatry would reasonably consider (sometime parlance and usage, "rely upon") those kinds of facts or data in forming their opinions.
34. In this Family Court Litigation Dr. Lee, Psychiatric Expert and Forensic Psychiatric Expert, may form her opinions using such kinds of facts and data, which facts and data need not be admissible for the opinion to be admitted.
35. In this Family Court Litigation Dr. Stone, Psychiatric Expert, and Forensic Psychiatric Expert, may form his opinions using such kinds of facts and data, which facts and data need not be admissible for the opinion to be admitted.

¹⁰ It is unfathomable that a trier of the fact sitting on the bench in a country ruled by law *ipse dixit* would rule on expert medical issues without qualified testimony by a medical expert.

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36. Dr. Lee's Psychiatric Expert and Forensic Psychiatric Expert communications about Family Court Litigation--- *whether or not received or given weight* --- were undisputed, uncontested, uncontroverted, and unchallenged by any properly qualified Psychiatric Expert or Forensic Psychiatric Expert. This statement is made to the best of my knowledge and belief that there is no public information in contradiction. This statement is made to the best of my knowledge and belief that no such information available to pro se litigant Ms. Patricia Lee, or anyone acting on her behalf.
37. Dr. Stone's Psychiatric Expert and Forensic Psychiatric Expert communications about Family Court Litigation--- *whether or not received or given weight* --- were undisputed, uncontested, uncontroverted, and unchallenged by any properly qualified Psychiatric Expert or Forensic Psychiatric Expert. This statement is made to the best of my knowledge and belief that there is no public information in contradiction. This statement is made to the best of my knowledge and belief that no such information available to pro se litigant Ms. Patricia Lee, or anyone acting on her behalf.
38. I incorporate by reference the evaluation with the Hare Psychopathy Checklist Revised, at the request of Mr. Alan Chan, by Bandy Lee, MD: Date of first diagnosis 5/20/2020 (shared with Mr. Chan), date of last diagnosis: 9/22/2021, notarized on that day by Notary Public Deanna Muriel, Notary Public State of New York No. 01MU6331764.
39. I incorporate by reference the letter of Professor Michael H. Stone, MD, dated 23 August 2021, including his Hare Psychopathy Checklist, referring to "... An assessment of your husband's [Mr. Chan's] personality configuration.... Through the use of the Psychopathy Checklist as devised by Dr. Robert Hare... From a diagnostic standpoint, it is considered as a valid indicator of psychopathy, if the score on the Hare Scale amounts to 30 or above... The total score happened to add up to '30.' This is quite suggestive that the personality-diagnosis of psychopathy is present and justified --- or, at the least, that strong 'psychopathic features' are present."
40. The creator of the PCL-R, Dr. Robert Hare, states, <http://www.hare.org/scales/pc1r.html>, Psychopathy Scales "...in the use of the PCL-R. We further recommend that, whenever possible, the PCL-R scores of two independent raters should be averaged so as to increase the reliability of the assessment."
Drs. Lee and Stone followed that recommendation by the creator of the scale. Independent of each other they rated 16 of 20 test items identically. gave identical s by two independent Forensic Psychiatric Experts agreed on 6 of 20 items in the Psychopathy Checklist-Revised. Independently of each other their total ratings were identical. The independently rated identical total score of 30 diagnoses psychopathic personality with the PCL-R.
41. For purposes related to this report, the preponderance of evidence, to a reasonable medical certainty, Mr. Alan Chan's personality traits are scientifically confirmed as:
Glibness/superficial charm, Egocentricity/grandiose sense of self- worth, Proneness to boredom/low frustration tolerance, Pathological lying and deception, Conning/lack of sincerity, Lack of remorse or guilt, Lack of affect and emotional depth, Callous/lack of empathy, Parasitic lifestyle, Short-tempered/poor behavioral controls, History of promiscuous sexual relations, History of early behavior problems, Lack of realistic, long-term plans, Impulsivity, Irresponsible behavior, Frequent marital relationships, Failure to accept responsibility for own actions.

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42. These expert medical findings are of the utmost and highest relevance for adjudication in general and in the Family Court in particular.
Exponentially more important in adjudication of clear and convincing evidence¹¹ to terminate parental privileges of one parent, an exceptional and devoted mother and to adjudicate and to apportion visitation and custody by her adversarial estranged husband to determine what is in the best interest of the children in virtually any and all related matters under litigation for this family.
43. State actor officials and their designees displayed wanton and reckless indifference and disregard of expert notice of conditions of unknown but potentially lethal dangerousness, if they looked at either or both Dr. Lee's and Dr. Stone's certified assessments of the Hare psychopathy checklists, it, and opinions based upon them IF they saw and ignored notice of clear and present danger. ***Res Ipsa Loquitur.***
44. In the alternative, *refusal* to consider and look at such information from world renowned experts constituted wanton and reckless indifference and disregard of the lives of Ms. Patricia Lee and her vulnerable children, Mirabelle Chan and Blake Chan. ***Res Ipsa Loquitur.***¹²
45. The state actors of the New Jersey Family Court, Bergen County, Chancery, and their associates and fellow travelers are in violation of numerous basic ratified, and other standing treaties, and bodies of international law, and mores^{13, 14} with respect to Ms. Patricia Lee and her children.
46. Presumption¹⁵ that the secret and hidden documentation of memorialization of officials and their associates acting under the false color of authority is an attempt to hide

¹¹ See Santosky v. Kramer, 455 U.S. 745 (1982), or even by a preponderance.

¹² The current fact pattern distinguishes unambiguously from Farmer v. Brennan, 511 U.S. 825 (1994):

Held:

1. A prison official may be held liable under the Eighth Amendment for acting with "deliberate indifference" to inmate health or safety only if he knows that inmates face a substantial risk of serious harm and disregards that risk by failing to take reasonable measures to abate it.

...the Courts of Appeals have routinely equated deliberate indifference with recklessness...It is, indeed, fair to say that acting or failing to act with deliberate indifference to a substantial risk of serious harm to a prisoner is the equivalent of recklessly disregarding that risk.

...The civil law generally calls a person reckless who acts or (if the person has a duty to act) fails to act in the face of an unjustifiably

high risk of harm that is either known or so obvious that it should be known.... The criminal law, however, generally permits a finding of recklessness only when a person disregards a risk of harm of which he is aware.

¹³ CAT, CRC, political rights, UDHR, disability, discrimination and race, women, trafficking and slavery, Geneva, Mandela...

¹⁴ for the purposes of forensic psychiatric expert opinion, the technicality whether treaties are "self-enforcing" in the formal ratification status are of interest but not of major concern. Abolition of slavery and universal suffrage, end of child labor Department of Labor, OSHA, EPA and other protections did not arise in the blink of an eye, rather in protracted engagement of multiple vectors and forces.

¹⁵ **Rule 301. Presumptions in Civil Cases Generally**

In a civil case, unless a federal statute or these rules provide otherwise, the party against whom a presumption is directed has the burden of producing evidence to rebut the presumption*

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evidence of guilt, *mens rea*. It is their affirmative obligation to provide evidence otherwise.

47. All memorialization of any non-civil matters must be brought to light. Particularly because of the powerful likelihood of affirmative defenses of necessity and self-defense given the circumstances of Ms. Patricia Lee.
48. Individually, and severally, Ms. Patricia Lee, Mirabelle Chan, and Blake Chan suffer physical and psychological distress caused by the torture.
49. Their pains and sufferings rise far beyond the level of significant impairments of major life activities.
50. Such physical and mental sufferings include, but are not limited to:
 - Ms. Patricia Lee
 - mental anguish, posttraumatic stress, depressive phenomena, and anxiety. Her profound resilience allows her to fully be capable to manage her life and maternal duties, responsibilities, and privileges with the sole exception of injuries caused by her estranged husband, Mr. Alan Chan, and the Family Court system and its associates and fellow travelers. Physical distress and suffering include hypertensive crises and dimensional events sufficient to require exercise tolerance testing as well as impaired speech and thought and other matters to be considered as appropriate.
 - Minor Child Mirabelle Chan
 - depression and suicidal features, withdrawal, regression of school performance disturbed sleep and appetite.
 - A PATTERN OF FAILING GROWTH RELATIVE TO EARLIER CHILDHOOD
 - Minor Child Blake Chan
 - depression and suicidal features
 - dramatic and regressive excessive psychosexual and genitourinary and bowel symptoms
- Individually and severally, they are entitled to ADA protections and accommodations, generally, and particularly, with respect to court and court related agencies parameters.
51. Individually and severally, they are entitled to antidiscrimination protections, including those of minority ethnic nature, violence against women, rights of children, universal declaration of human rights, municipal, state, and federal protections, as well as treaties which are the law of the land when ratified, of which there are several.
52. Ms. Patricia Lee is entitled to protections of freedom of speech as well as protection from discrimination and ill-treatment on the basis of political views.
53. She and the children are entitled to protection of their cultural concerns and interests (such as their Christian faith, regarding which they were deprived of their most important holiday of the year when the children were forced to spend Christmas with their non- if not anti-Christian father).
54. The Mandela rules afford protections from torture and mistreatment, and entitlement to decent food and housing and medical care. The Geneva conventions provide similar protections under work conditions for combatants, *hors de combat*, civilians, and all other allegories of persons not otherwise specified. Such floor for prison convicts and persons

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caught up in war dramatically exceeds the torture inflicted upon these people. And the denial of medical care of urgent, imminent, and to this date consciously denied service, and the rights to legal representation of their choice.

55. They have been denied qualified¹⁶ professional evaluation.

56. Political forces act in this case.

- i. Daubert black letter law has been erased: one by in-person self-assessment by an eyewitness Kin, treating & forensic world-renowned authoritative expert; and one by that person's wife report to her treating & forensic world-renowned authoritative expert. It should be like carrying coal to Newcastle. Instead, it is necessary to turn on the light in the dark, as it were for people who have blinders, eyes that see but and cannot see.
- ii. Mirabelle Chan, Blake Chan, and their aunt have civil cases, for which the denial of and termination of parental rights rises from the civil threshold of preponderance of evidence to clear and convincing nominally 75%, intermediate with beyond a reasonable doubt in criminal cases.
- iii. Mandela rules focus primarily on prisoners and civil incarceration Geneva conventions focus primarily on prisoners of war and others caught up in war. The level of protection of human beings in those minimal floors of civil prisoners, and persons caught up in war is much higher than the current Family Court actions involving persons Patricia Lee and her children Mirabelle Chan and Blake Chan, as well as their next of kin, proxy treating physicians, forensic psychiatric experts.
- iv. Seals and secrecy are illegitimate and illegal until proven otherwise. This case, involving unheard of Star chamber-like secrecy and accusations, suggest state actors behaving with autocratic and arbitrary impunity. Character assassination and psychological and medical assaults through threat of imprisonment are not hypothetical.

57. A person does not need to qualify for a diagnosis to be dangerous.

58. Traits are not harmless. Recognized authorities who have used legitimate scientific methods discuss the elevated incidence of psychopathy in the financial community, nominally 400 to 900% over the rest of the population.

¹⁶ 2019 NJSBA Annual Meeting When and How To Use Experts In Family Law Cases Co-Sponsored by the Family Law Section

Speaker: Hon. Thomas J. Walsh, J.S.C., Union County

WHEN DO YOU NEED AN EXPERT IN A FAMILY LAW CASE? THOMAS I. WALSH. J.S.C.

2. Who can be an expert?

*Remember though, the decision to qualify someone as an expert relies with the court. As it is within the court's discretion, it is only subject to appellate review as an **abuse of discretion**. PRACTICE TIP-It is usually a fool's errand to try to prove a witness shouldn't be qualified as an expert, unless your adversary tries **something truly stupid, like qualifying a counselor or social worker as a custody evaluator**.*

3. Is there a basis for an expert's opinion?

...If they are opining on character traits of the parties, are those opinions based on psychological testing that they've done, or are they merely giving their opinion based on their own interview and without any empirical evidence.

<https://tcms.njsba.com/personifyebusiness/Portals/0/2019%20AM%20Materials/When%20and%20How%20to%20Use%20Experts%20in%20Family%20Law.pdf> 22-3-29 13357pm

BARRY H. ROTH, MD

Diplomate of the American Boards of Psychiatry and Neurology & Preventive Medicine
Certifications in Psychiatry

Addiction Medicine Addiction Psychiatry Geriatric Psychiatry Forensic Psychiatry

320 Washington St., 4th Floor, Brookline, MA 02445-6873

Telephone: (617) 734-3572 Fax: (617) 734-2757

59. Traits of sadism, cruelty, lying, superficiality, acting so as to get unsuspecting others to do one's bidding, lack of concern for others, etc., can be fatal.

Qualifications

I am a Distinguished Fellow and Distinguished Life Fellow of the American Psychiatric Association, active in both the APA and the World Psychiatric Association, Member, Section on Psychological Consequences of Torture & Persecution, member of the International Forum of Teachers (IFT) of the UNESCO Chair in Bioethics. I am an international authority on torture who coordinated 19 scientific and medical *amici curiae* and helped write the SCOTUS brief¹⁷

¹⁷ [brief and Eric Ordway letter]

INTEREST OF AMICI CURIAE International experts from numerous countries, Decades of experience studying IP-level abuses, especially solitary confinement, Uniquely positioned to discuss health-related scientific literature, and international legal standards & foreign laws, Advocate to abolish the inflicted abuses not Turkmen state of emergency [Bush and ICC, McNamara and war crimes]

“Special Factors” [weave an alternate reality & grant impunity to Executive Officials]

“*the Court accepts as true the facts alleged in the complaint...*” “what happened to the respondents in the days following September 11 was tragic.” “Nothing in this opinion should be read to condone the treatment...”

“The question before the court, however, is *not* whether (Executive Official’s) alleged conduct was proper, *nor* whether it gave decent respect to the [detained immigrants’] dignity and well-being, *nor* whether it was in keeping with the idea of the rule of law .

“Detained Immigrants claims against the Executive Officials, [are] not a ‘proper vehicle;’ because Detained Immigrants policy claims challenge more than standard ‘law enforcement operations.’ They challenge major elements of the Government’s whole response to the September 11 attacks... And require inquiry into sensitive issues of national security... prerogative of the Congress and President.”

Given the present procedural posture of the suit, **the Court accepts as true the facts alleged in** the complaint.
See *Iqbal*, 556 U. S., at 678.

If the facts alleged in the complaint are true, then what happened to respondents in the days following September 11 was tragic. Nothing in this opinion should be read to condone the treatment to which they contend they were subjected. The question before the Court, however, is not whether petitioners’ alleged conduct was proper, nor whether it gave decent respect to respondents’ dignity and well-being, nor whether it was in keeping with the idea of the rule of law that must inspire us even in times of crisis.

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Further explanation

Torture, strictly defined, has caused Profound, severe, pervasive, past, ongoing and increasing, life-threatening physical and psychologic traumas and injuries of massive proportion of a loving mother and her two vulnerable children. It is extreme, potentially beyond remedy at this point.

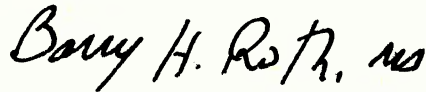
It is intentional, concerted, and pervasive as perpetrated and perpetuated by known and visible public figures, diametrically opposite to their sanctioned and authorized roles and behaviors.

When causes and conditions are sufficient, phenomena arise.

Torture has caused the suffering of Ms. Patricia Lee, Mirabelle Chan, and Blake Chan. The acts of omission and commission of the Family Court and its fellow travelers and Associates are on their face conscious and intentional, and coincide with the benefit and character traits of Mr. Alan Chan.

Basic common decency and the rule of law in a democracy demand halt of the torture, making whole the objects of the torture, and an end to impunity of the perpetrators and the demand of accountability.

Sincerely,

A handwritten signature in black ink that reads "Barry H. Roth, MD". The signature is written in a cursive, flowing style.

Barry H. Roth, MD

REVIEW OF FORENSIC EVALUATIONS CONDUCTED BY DR. BARRY ROTH, MD

I am a physician licensed in the State of Michigan and a diplomate of the American Board of Internal Medicine. I am Medical Director of Physicians for Human Rights (PHR) and Professor of Internal Medicine and Public Health at the University of Michigan. I have conducted hundreds of medico-legal evaluations of survivors of torture and ill treatment and have led trainings of clinicians in how to conduct effective medico-legal investigations and documentation of cases alleging torture and ill treatment. As an investigator for Physicians for Human Rights since the 1990s, I have led and participated in multiple human rights investigations, including forensic medical examinations and work to improve forensic examination and documentation in Mexico and Turkey. I have authored over 275 peer-reviewed studies published in medical and public health journals including The Lancet, BMJ, The New England Journal of Medicine, JAMA, and the American Journal of Public Health. Since 2018, I am an elected member of the Association of American Physicians, an honorary medical society for outstanding researchers in medicine. I am also an elected member of the International Forensic Expert Group (IFEG).

Dr. Barry Roth, MD, at present, is actively Board Certified in Psychiatry, Forensic Psychiatry, Geriatric Psychiatry, Addiction Psychiatry, and Addiction Medicine. He is a Distinguished Fellow and Distinguished Life Fellow of the American Psychiatric Association; Member of the World Psychiatric Association, active in the Section on Psychological Consequences of Torture & Persecution; and Member of the International Forum of Teachers (IFT) of the UNESCO Chair in Bioethics. He coordinated 19 scientific and medical experts and helped write the Supreme Court of the United States Brief for Turkmen (successful in July after 20 years), wrote an Istanbul Protocol report submitted to the International Criminal Court, and was one of the "Collaborating Investigators" in the "DSM-5 Field Trials in Routine Clinical Practice Settings." He is a co-author of the 2022 Istanbul Protocol, considered the international standard for documenting torture and ill treatment.

Dr. Roth's work is known to me from his long involvement in anti-torture activities and rigorous medico-legal assessments of individuals who have experienced torture and ill treatment. He requested that I review and provide an opinion on his evaluation and conclusions from his examination of Ms. Patricia Lee (documents dated April 6, 2022, and May 3, 2022). I did not receive any compensation for conducting this review.

Based on review of supporting documents and Ms. Lee's reports of the treatment of her and her two children by Mr. Alan Chan, Dr. Roth concluded that in his professional judgment her symptoms and signs were consistent with physical and psychological abuse from Mr. Chan. As he noted, the harms from psychological abuse that in his view reached the severity of torture can have as severe and even longer-lasting harms than physical abuse. In my opinion, his assessments met the highest standards.

Dr. Roth has deep expertise and experience assessing survivors of torture and ill treatment and correlating their accounts of their experiences of abuse with the findings from his psychological assessment of them. The findings and conclusions from his assessments of Ms. Lee must be duly considered and responded to.

Michele Heisler

Michele Heisler, MD, MPA

Professor of Internal Medicine and Public Health

Co-Director, Michigan Center for Diabetes Translational Research (MCDTR—NIDDK P30DK092926) University of Michigan, Ann Arbor, MI

Medical Director

Physicians for Human Rights (PHR), New York, NY