



Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

**IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**

ANTHONY ADENIYI OGUNDANA)

Plaintiff)

Civil Action)

vs.)

Case Number: 20-1-04957-40

HELEN ADENIKE ADEGITE)

s/k/a OGUNDANA)

Defendant)

**DEFENDANT’S MOTION TO DISQUALIFY COURT APPOINTED
GUARDIAN AD LITEM**

NOW COMES, Defendant Helen Adenike Adegite by and thru the undersigned counsel and files this Motion to Disqualify Court Appointed Guardian Ad Litem, Brandy Daswani pursuant to O.C.G.A. § 15-11-104, Uniform Superior Court Rule 24.9 and all other applicable law. Under Georgia Uniform Superior Court Rule 24.9 (8)(h), one can file a motion to remove the Guardian ad Litem “for good cause shown” – meaning, that one has to present substantive evidence of a Guardian’s bias, unsatisfactory performance, or any other “good cause”. Ms. Adegite is not bringing this motion to remove the GAL merely because she may

Simply disagree with the GAL. But is doing so because Defendant's counsel learned days ago of Ms. Daswani failure to disclose her financial/personal relationship between she and Plaintiff's counsel, Angel Cordle in this case. The GAL willfully and intentionally failed to disclose that in 2017, Ms. Cordle represented her in a federal bankruptcy case as counsel – see EXHIBIT A. It is well established that the guardian must disclose promptly any conflict of interest between the guardian and the minor when it arises or becomes known to the guardian and seek the court's determination as to whether the conflict is insubstantial or if it is in the best interest of the minor for the guardian to continue to serve. O.C.G.A. §29-2-23.

Moreover, Ms. Adegite asserts that Ms. Daswani has demonstrated a consistent bias against her. Ms. Daswani's affection and favor for the Plaintiff is no longer unexplained, given her undisclosed professional/financial relationship with Ms. Cordle as counsel in her personal case, as the plaintiff in a bankruptcy case at the time of appointment in this matter. In support thereof, Defendant has attached her *Sworn Affidavit in Support of her Motion to Remove the GAL* in this matter – see EXHIBIT B.

Pursuant to O.C.G.A. § 15-11-104(h), “the Court may remove a guardian ad litem from a case upon finding that the guardian ad litem acted in a manner contrary to a child's best interests, has not appropriately participated in the case, or if the court otherwise deems continued service as inappropriate or unnecessary.” Ms. Adegite is asking for justice and fairness in being protected by this honorable Court against an improper relationship and/or conflict of interest between the GAL, Ms. Daswani and Plaintiff’s attorney, Ms. Angel Cordle.

A lawyer, as a member of the legal profession, is a representative of clients, an officer of the legal system and a public citizen having a special responsibility for the quality of justice. The *Georgia* Rules governing the professional and ethical conduct of *Counsel* makes it abundantly clear (supported by case law) **that counsel is to avoid the appearance of impropriety**. The appearance of said impropriety is very evident in the instant case. Had Ms. Daswani disclosed that Ms. Cordle had represented her as personal counsel in a bankruptcy case, the undersigned counsel would have objected readily to her appointment as a GAL- which acts as the “ears and eyes” of this Court.

WHEREFORE, Defendant respectfully requests that she be granted audience by the Court to present her objections to Ms. Daswani’s qualifications as guardian ad litem in this matter.

This 7th day of September 2021.

Respectfully Submitted:

By: /s/ Khadizeth Toure-Samba
Khadizeth Toure-Samba, Esq.
GA Bar #: 141714
Attorney for Defendant

TOURE-HERNANDEZ & ASSOCIATES, PC

2295 Parklake Drive, NE

Suite 465

Atlanta, Georgia 30345

Tel: 404-499-1212 Ext. 222 (Direct)

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tourehernandez@lawyer.com

CERTIFICATE OF SERVICE

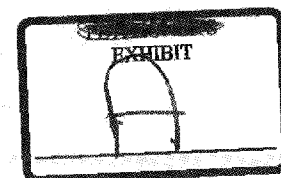
I, Khadizeth Toure-Samba, Attorney at Law, do hereby certify that I served a copy of the foregoing Motion to Disqualify Guardian ad Litem Brandy Daswani via electronic service upon Petitioner/Plaintiff's counsel and court appointed guardian ad litem:

Angel Cordle, Esq.
199 Frazier Street, SE
Marietta, GA 30060
Tel: 678-564-4400
Fax: 678-564-4401
angelcordell@gmail.com

Brandy Daswani, Esq.
Guardian ad Litem
2440 Sandy Plains Rd
Bldg. 27, Suite 100
Marietta, GA 30066
Tel: 770-726-2648
brandy@dsfamilylaw.net

DATE: 09/07/2021

/s/ Khadizeth Toure-Samba
Khadizeth Toure-Samba, Esq.
Counsel for Petitioner
2295 Parklake, NE
Suite 465
Atlanta, GA 30345
tourehernandez@lawyer.com



Daswani v. Saras

[Dashboard](#)

Adversary Proceeding Lead BK case is: 1:16-bk-65219

**Georgia Northern Bankruptcy Court
Chapter 7**

Judge: Paul Baisier
Case #: 1:16-ap-05248

Nature of Suit

64 Bankruptcy - Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support)
61 Bankruptcy - Dischargeability - §523(a)(5), domestic support

Case Filed: Sep 30, 2016
Terminated: Jun 27, 2017

[Docket](#) [Parties \(2\)](#) [News](#)

Last checked: never

[Update Parties](#)

Defendant

Shelley James Saras
422 Brookhaven Way NE
Atlanta, GA 30319

Represented By

Shelley James Saras

Plaintiff


Brandi Daswani
440 Sandy Plains Rd
Marietta, GA 30066


Represented By

Randolph E. Cordle
Coats & Cordle, Attorney At Law, Inc.
770-577-7155
randy@coatsandcordle.com


Ellen Angel Cordle
678-564-4400
angelcordle@gmail.com

Wednesday, February 08, 2017


11  [misc](#) [0-Certificate of Service](#)
Cordle on behalf of Brandi **Daswani**.
(Cordle, Randolph)

10  [notice](#) [Notice of Leave of Absence](#)
Application for Leave of Absence from March 2, 2017 through March 14, 2017 Filed by Ellen Angel Cordle on behalf of Brandi **Daswani**. (Cordle, Randolph) Modified on 2/9/2017 (cws)


Tuesday, December 20, 2016


9  [misc](#) [Return Mail Notice](#)
Notice Regarding Return Mail addressed to Brandi **Daswani**. Service by BNC.
(smw)

Thursday, October 27, 2016

5  [misc](#) [0-Certificate of Service](#)
Cordle on behalf of Brandi **Daswani**. (Cordle, Randolph)

Friday, September 30, 2016

1  [cmp](#) [Complaint](#)
Complaint against Shelley James Saras , Fee Collected \$ 350 61 (Dischargeability - 523(a)(5), domestic support) 64 (Dischargeability - 523(a)(15), divorce/sep property settlement/decre) Filed by Brandi **Daswani**
(Cordle, Randolph)

3  [misc](#) [0-Certificate of Service](#)
Cordle on behalf of Brandi **Daswani**.
(Cordle, Randolph)

Last viewed: Aug 30, 2021 1:52 AM EDT

Daswani v. Saras

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Georgia Northern Bankruptcy Court

Chapter 7

Judge:

Paul Baisier

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Represented By

Shelley James Saras
[contact info](#)

Plaintiff

Brandi Daswani
440 Sandy Plains Rd
Marietta, GA 30066

Represented By

Randolph E. Cordle
Coats & Cordle, Attorney At Law, Inc.
[contact info](#)

Ellen Angel Cordle
[contact info](#)

Docket last updated: 08/27/2021 1:05 PM EDT

Tuesday, June 27, 2017

misc **Adversary Closed** **Tue 06/27 10:02 AM**

Adversary 1:16-ap-5248 Closed (cws)

Thursday, June 01, 2017

21  **misc** **Certificate of Mailing by BNC of Judgment** **Fri 06/02 1:37 AM**

Certificate of Mailing by BNC of Judgment Notice Date 06/01/2017. (Admin.)

Tuesday, May 30, 2017

20  **order** **Judgment** **Tue 05/30 10:52 AM**


Consent Judgment and ORDERED that Plaintiff shall have judgment against the Defendant in the amount of three thousand six-hundred and twenty nine dollars and ninety cents (\$3,629.90) Service by BNC Entered on 5/30/2017. (cws)

Related: [-] 1 Complaint filed by Brandi Daswani

Friday, May 12, 2017

19  **misc** **Certificate of Mailing by BNC of Return Mail.** **Sat 05/13 1:29 AM**

Certificate of Mailing by BNC of Return Mail. Notice Date 05/12/2017. (Admin.)

18  **misc** **0-Change of Address (document requesting)** **Fri 05/12 2:31 PM**

Change of Address of Shelley James Saras Filed by William A. Rountree on behalf of Shelley James Saras. (Rountree, William)


Wednesday, May 10, 2017

17  **misc** **Return Mail Notice** **Wed 05/10 1:14 PM**

Notice Regarding Return Mail addressed to Shelley James Saras . Service by BNC. (rf)


Related: [-] 15 Order and Notice

Friday, March 31, 2017

16  **misc** **Certificate of Mailing by BNC of Order and Notice** **Sat 04/01 1:29 AM**

Certificate of Mailing by BNC of Order and Notice Notice Date 03/31/2017. (Admin.)


Wednesday, March 29, 2017

15  **notice** **Order and Notice** **Wed 03/29 1:40 PM**

ORDERED that the Motion is granted. It is further ORDERED that the Hearing is continued to the 25th day of April, 2017, at 3:00 p.m. in Courtroom 1202, at the Richard B. Russell Federal Building, 75 Ted Turner Drive, S.W., Atlanta, Georgia, counsel for Plaintiff shall appear and show cause why the Complaint should not be dismissed for failure to prosecute. Ordered that a status conference will be held on April 25, 2017 at 3:00 p.m. in Ctrm. 1202 Service by BNC. Entered on 3/29/2017. (cws)

Related: [-] 1 Complaint filed by Brandi Daswani, 14 Stipulation filed by Shelley James Saras

Friday, March 24, 2017

14  2 pgs misc Stipulation Fri 03/24 2:00 PM

Joint Stipulation for Continuance Filed by William A. Rountree on behalf of Shelley James Saras. (Rountree, William)


Related: [-] 12 Order and Notice

Thursday, March 02, 2017

13  misc Certificate of Mailing by BNC of Order and Notice Fri 03/03 1:44 AM

Certificate of Mailing by BNC of Order and Notice Notice Date 03/02/2017. (Admin.)

Tuesday, February 28, 2017

12  notice Order and Notice Tue 02/28 3:51 PM

ORDERED AND NOTICE IS HEREBY GIVEN that counsel for Plaintiff shall appear at a hearing to be held on the 28th day of March, 2017, commencing at 3:00 p.m. in Courtroom 1202, at the Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Drive, S.W., Atlanta, Georgia and show cause why the Complaint should not be dismissed for failure to prosecute. It is further ORDERED AND NOTICE IS HEREBY GIVEN that a Status Conference will be held on this matter on the 28th day of March, 2017, commencing at 3:00 p.m. in Courtroom 1202, at the Richard B. Russell Federal Building and United States Courthouse. Service by BNC. (cws)

Related: [-] 1 Complaint filed by Brandi Daswani

Wednesday, February 08, 2017

11  misc 0-Certificate of Service Wed 02/08 8:20 PM

Certificate of Service filed by Randolph E. Cordle on behalf of Brandi Daswani. (Cordle, Randolph)

Related: [-] 10 Notice of Leave of Absence

10  notice Notice of Leave of Absence Wed 02/08 8:18 PM

Application for Leave of Absence from March 2, 2017 through March 14, 2017 Filed by Ellen Angel Cordle on behalf of Brandi Daswani. (Cordle, Randolph) Modified on 2/9/2017 (cws)


Tuesday, December 20, 2016

9  misc Return Mail Notice Tue 12/20 10:51 AM

Notice Regarding Return Mail addressed to Brandi Daswani. Service by BNC. (smw)


Related: [-] 7 Order and Notice

Wednesday, November 23, 2016

8  misc Certificate of Mailing by BNC of Order and Notice Thu 11/24 1:51 AM

Certificate of Mailing by BNC of Order and Notice Notice Date 11/23/2016. (Admin.)


Monday, November 21, 2016

7  notice Order and Notice Mon 11/21 9:54 AM


Order and Notice of rule 26(f) conference. Service by BNC. Entered on 11/21/2016. (cws)

Related: [-] 1 Complaint filed by Brandi Daswani


Friday, October 28, 2016

- 6  **answer** **Answer to Complaint** **Fri 10/28 3:25 PM**
Answer to Complaint to Determine Dischargeability and Objection to Motion to Lift Stay filed by William A. Rountree on behalf of Shelley James Saras. (Rountree, William)



Thursday, October 27, 2016

- 5  **misc** **0-Certificate of Service** **Thu 10/27 4:04 PM**
Certificate of Service Filed by Randolph E. Cordle on behalf of Brandi Daswani. (Cordle, Randolph)

Monday, October 03, 2016

- 4  **court** **Summons Issued (auto)** **Mon 10/03 3:45 PM**
Summons Issued on Shelley James Saras Answer Due 11/2/2016 (cws)

Friday, September 30, 2016

- 3  **misc** **0-Certificate of Service** **Fri 09/30 3:07 PM**
Certificate of Service Filed by Randolph E. Cordle on behalf of Brandi Daswani. (Cordle, Randolph)
Related: [-] 1 Complaint filed by Brandi Daswani
- 2 **crditcrd** **Autodocket of Credit Card** **Fri 09/30 3:04 PM**
Receipt of Complaint 16-05248 [cmp,cmp] (350.00) filing fee. Receipt Number 42931892. Fee Amount 350.00 (U.S. Treasury)
Related: [-] Doc#1
- 1  **cmp** **Complaint** **Fri 09/30 3:01 PM**
Adversary case 16-05248 Complaint against Shelley James Saras , Fee Collected \$ 350 61 (Dischargeability - 523(a)(5), domestic support) 64 (Dischargeability - 523(a)(15), divorce/sep property settlement/decre) Filed by Brandi Daswani (Cordle, Randolph)

[Continue to Create Account](#)



**SOWRN AFFIDAVIT DEMONSTRATING BIAS AND PREJUDICE
OF THE GUARDIAN AD LITEM (MS. BRANDY DASWANI)**



1. My name is Helen Adegite. I am the biological mother of Sophia-Arlene Ogundana born in the United Kingdom in 2013.

2. I had an appointment booked that was booked with the Guardian Ad Litem scheduled for the 29th of July 2021. Without notice, and the exemption of courtesy as required by the Guardian Ad Litem, I was suddenly alerted by the Legal assistant on the 26th of July to attend a zoom meeting with Ms. Daswani at 10am, without any prior notification. I was hardly given any choice to make any changes to the meeting.

3. During the meeting, Ms. Daswani accused me of dating Mr Ogundana whilst married, I replied by telling her that I was separated before I met him. Told her that I was no more in contact with my ex-husband at that time, and Mr. Ogundana knew about my relationship status at some point before we got married. There are emails to confirm this, but it was disregarded. Ms. Daswani insinuated that I was doing something illegal by dating Mr. Ogundana during my separation. Mr. Ogundana was also separated when we met, he was not divorced from his ex-spouse whilst we were dating. She made the comment that my relationship status (separated) was an issue at that time, but not his. It was obvious she was already biased. She also made a cynical statement about the avalanche of evidence that my Attorney had mentioned in her email to her. It appears to be more of an overall proponent, of proving the talking points of repeated opposing counsel's arguments in both Cobb County hearings and Fulton County TPO hearings, even when all the evidence was provided to the contrary.

4. I was also accused of not telling the truth about getting a divorce by publication, she quoted: How did you get that? It is very rare in Georgia", she was very skeptical of my final Divorce Decree from Cobb County Superior Court. She doubted me when I told her that, according to the divorce decree, I was granted sole legal physical custody of Sophia.

5. At the initial meeting, Ms. Daswani asked me how I could afford to take care of Sophia. Ms. Daswani showed prejudice towards my socioeconomic status, which clearly goes against the Guardian Ad Litem's guidelines. Also appears that she was indirectly assuming that I was obtaining my income somehow through illicit means. I explained to her that I was self-employed, and I had been taking care of Sophia on my own, with my earnings. And we were

doing perfectly fine. I also informed her that I made sure that Sophia was in the best school district in the State for her education. As well as attending all her extra curricula activities for more than 3 years. They were not taken into account before her recommendation on the 9th of August 2021.

6. I was also asked how I was able to retain a Pro Bono attorney; Ms. Cordle made a similar statement during the TPO hearing on the 9th of August 2021, indirectly accusing me for receiving support from Domestic Violence organizations as a Domestic Violence Survivor.
7. On the 8th of July 2021, Mr. Ogundana sent a message to Sophia via Skype (there is a copy of this message) that he would be seeing Sophia face to face at the Guardian Ad Litem's office. He also told Sophia that the Guardian Ad Litem would be giving him custody very soon- he was very confident with this information he had received from the Guardian Ad Litem and his counsel Ms Cordle. Sophia was released to his custody just as he confirmed.
8. I learned that Mr. Ogundana did not make the full payments towards the retainer, but I was told that the investigation would not commence till full retainer was paid. Although I had some delays in making the payments, due to my halted immigration status that was caused by my former spouse. My immigration status was canceled by Mr. Ogundana as part of the threats that were made not to report the abuse. I made sure the court order was followed, and made full payments before my meeting. There were no indications that Ms Daswani found Mr Ogundana in contempt of the court, by not following the court order to make the payment to the Guardian Ad Litem in due course.
9. As part of the guidelines for Guardian Ad Litem's to adhere to, Ms. Daswani did not consider Sophia's safety and mine, during this investigation. Our residential address was released to Mr. Ogunada and his counsel without hesitation, despite avalanche of evidence indicating history of past and present abuse, recent threats to Sophia's life and mine were ignored by Ms. Daswani on purpose. Evidence from Domestic violence shelters, police reports, police bodycam videos, text messages, WhatsApp messages, emails, audio and video recordings. She ignored all evidence that was provided confirming history of past and present Domestic Violence towards Sophia and I. Evidence of abuse before we relocated to the United States, from the United Kingdom, evidence of abuse during the marriage, separation and Divorce were also disregarded. Neither did she make a thorough investigation before she released Sophia to Mr. Ogundana's custody on the 9th August 2021. No background check was done on Mr. Ogundana's girlfriend, to protect Sophia's safety. Sophia had never met the Girlfriend prior to 9th of August. Ms. Daswani

confirmed that Mr. Ogundana had a one bedroom, and was concerned about it, but quickly changed her mind when he informed the court that his girlfriend had a bigger house. No checks were made, no home visits, were done, before Sophia's release to his custody. Mr. Ogundana has a misdemeanor conviction in Fulton County, his arrests records for Family violence and child cruelty in Cobb County were all ignored. Pending investigations on sexual abuse towards a minor was also disregarded.

10. On the 27th of July 2021, whilst I was out with Sophia running errands, attending appointments, and attending to her extracurricular- activities, all far away from home- we were hours away from home during the rush hour. I received a telephone call from the Guardian Litem's office that Ms. Daswani wanted to see Sophia as soon as possible, I politely asked to change the date till the next day, I explained to her, that I had prior appointments for Sophia, that were very important. I told her that, I also had a lot of meetings to attend to that day, and asked if we could reschedule, for the following day. I pleaded with them to allow me to attend those meetings, appointments, extra-curricular activities, and do some groceries shopping. I also reminded her that she had rescheduled an appointment a day earlier which I obliged and attended to, without any notifications from her. I did not hesitate when she moved the appointment to an earlier date. My request to reschedule the meeting with Sophia for another day was denied. I had no choice but to cancel all my prior meetings and appointments so that Sophia would attend the meeting with Ms. Daswani. No courtesy was shown to me once again. My concerns were gravely ignored by the Guardian Ad Litem.
11. On the 26th of July 2021, I received an email from Ms. Daswani with a list of evidence to provide for the investigation- Emails, text messages, WhatsApp messages from 2017 till 2021 between myself and Mr. Ogundana, Messages with former Brother-in-law, messages with Mr. Ogundana's best friend. In total I was to provide 15 different types of evidence. I was asked to retrieve emails from more than 4 years ago, from different sources/witnesses from 2017-2021. Ms Daswani did not give me a deadline date for submission.
12. Mr. Ogundana had prior knowledge of the report before the hearing on the 9th of August 2021, he learned that I had provided Ms. Daswani copies of messages between myself and his brother Ms. Daswani. He knew about all the evidence that had been submitted to Ms. Daswani. I informed my Attorney as soon as this was disclosed to me. My counsel and I have not seen nor read the copy of the report till date.

13. On the 29th of July, I was asked to send copies of recordings of abuse/ altercations between myself and my former husband whilst we were married. There were statements made by me to Mr. Ogundana on the audio recordings, that he was physically, mentally/emotionally, abusive towards Sophia and I. I spoke about how he tortured me during the marriage, without any rebuttals/denials from Mr. Ogundana. Mr. Ogundana can be heard pleading with me to forgive him for any wrongdoings he had done towards Sophia and I. Ms Daswani heard Mr Ogundana confessing and apologizing to me for abusing Sophia and I. These were disregarded by the Ms. Daswani. According to Ms. Daswani and Ms. Angel Cordle (Mr Ogundana's counsel), there was no evidence of abuse on the audio recordings. Their biased conclusions were clearly not supported by the videos and email exchanges before I filed for divorce.

14. As part of my evidence, I also provided a police report of the family violence, battery and child cruelty incident that happened on the 1st of May 2017. As well as a Police Bodycam that was taken on the 1st May 2017. The Police noted that I found a bruise on Sophia's genitals-The Police officer that was on duty that night also saw the bruise, that was caused by her father. I explained to Ms. Daswani, that I thought it was a mistake when that incident happened in 2017, because we had never lived together prior to 2017. I was Sophia's sole caretaker from birth till we relocated from the United Kingdom in 2017. I also sent in pictures of the bruises I sustained that night. Mr Ogundana was found to be the aggressor during the domestic violence towards Sophia and I, and he was arrested that night for family violence, battery and child cruelty. I also sent a bodycam taken by the Police officers on duty that night of the incident that showed my bruises and marks that were sustained during the physical abuse in 2017, this was not properly investigated by Ms. Daswani. My concern about the sexual abuse towards Sophia was brought to light when Sophia disclosed inappropriate touching by her father to me in the United Kingdom in 2018. I called Mr Ogundana on facetime, to clarify what Sophia had revealed to me. During the facetime call whilst in the United Kingdom in 2018, he flew into a rage, denying the disclosure. His behavior was similar to what happened a year before when he assaulted Sophia and I and he was arrested. This time, it was over the phone. He went ahead to send messages to threaten me, and threaten Sophia's life, insisting that I should not travel back to the country (US) with Sophia, after I told him I would report the disclosure to the Police. We both had an agreement that Sophia and I would travel to the UK from the US together- there is an official letter by him to support to this. I wanted the disclosure made by Sophia to be properly investigated this time around, because no investigations were done in 2017, when the first the bruise was found. I recalled that, Mr. Ogundana had told the Police and myself that the bruise on Sophia's genitals was caused by a sponge. He became really angry with me that night, because I asked him to show empathy to Sophia because she was in pains, from the bruise. He declined my requests to take Sophia to the hospital to get her checked out, to avoid any infections. Mr. Ogundana showed no concerns towards Sophia's wellbeing that night. Instead of helping me to attend to Sophia's that night, he got angry with me and he physically assaulted

Sophia and I. My evidence was downplayed during the TPO hearing on the 9th of August 2021. The bodycam video also showed that I declined to go to the hospital because of the threats made by Mr. Ogundana. I had just arrived less than 3 weeks before, in the US from the UK. Mr. Ogundana had warned me not to go to the hospital in the United States, as an immigrant, because of the high cost of medical bills. I reluctantly declined the request to go to the hospital by the paramedics, when asked to go in for my injuries and Sophia's. He also threatened my immigration status at that time, I had no choice but to decline. I also told the Police about the blows to my jaw by my husband at that time, Ms. Daswani claimed that she saw no evidence of a blow to my jaw during the hearing on the 9th of August 2021 at Fulton County court during the TPO hearing. I sent her copies of the videos. I also offered to give Ms. Daswani a flash drive to view these recordings but she said "she did not want a virus on her system" I assured her that it was a newly purchased flash drive, that had never been used, with no virus, but she declined- this would have helped her investigation into my reports that Mr. Ogundana had been touching Sophia inappropriately, and had caused a bruise on her genitals in 2017, shortly after we moved to the United States to get married on the 22nd of April 2017. More video recordings of Sophia, showing how terrified she was in the presence of her father, that were ignored by the Guardian Ad Litem on purpose.

15. I sent in pictures and videos of the injuries that I sustained to file for a TPO in November 2017. I explained the reasons the TPO was voluntarily dismissed by me in 2017- the reason for the dismissal was because, Mr Ogundana had threatened to destroy Sophia and I, and threatened to nullify my immigration status in the country if I did not dismiss the TPO. He had also threatened to take Sophia from me, because I did not have any rights as an immigrant in the county.
16. In fact, while being questioned by my attorney on the 9th of August 2021, Ms. Daswani admitted that she had not viewed the Police bodycam video prior to coming to court, and the said video would have supported my statements of domestic violence, sexual abuse, and child cruelty towards Sophia, as I testified under oath.
17. Ms Daswani made a statement at the Fulton County court hearing for the TPO, that from the little she read in the messages to me from Mr Ogundana, she found that he was extremely emotionally and verbally abusive towards the family, she confirmed that he was a very bad man- that he cared only about himself. The Guardian was biased in her investigation, and she ignored the evidence of physical, sexual and mental abuse in the documents and evidence that were submitted to her. She also went on to make an unfair comment during the hearing as thus: "I knew the type of man he was, and I decided to have a child for him". According to reports by

domestic violence organizations, a domestic violence victim goes back to their abuser an estimated 7 times before having the courage to leave his or her abuser. There are circumstances that prevent a victim for leaving their abusers. I had explained my reasons to Ms Daswani during our meeting for not leaving Mr Ogundana at different times during the volatile relationship, due to blackmail, threats to my life before and after the marriage, threats to Sophia's life, threats to cancel and halt my immigration status, amongst many other reasons prevented me from not leaving the relationship. Ms Daswani's was prejudiced and unfair in her hostile statements towards me.

18. The threats to Sophia's life and mine were not followed up. I sent copies of threatening emails, and messages from Mr. Ogundana that he would destroy my life and Sophia's -these were also disregarded. Threats to harm and destroy Sophia, threats to abduct Sophia to another country once given custody, via several emails and messages were not taken into consideration before she made her recommendations and verbal reports on the 9th of August 2021.
19. Ms. Daswani was notified by my Attorney to inform Anthony and his counsel to follow the court ordered Skype calls during the scheduled times, these were conveniently ignored by Mr. Ogundana and his counsel Ms. Cordle. He would call and send messages before and after the scheduled times, whereas she would chastise me that I do not follow court orders. I provided evidence to dismiss the false Claims of not following court orders. False Claims are as follows; Nonattendance of UK hearings, no release of Sophia to Mr. Ogundana's custody on the 9th of August at the scheduled time and visits to Sophia's school. Ms. Cordle and Ms. Daswani, both pretended at the Fulton County hearing when calling out Mr. Ogundana's Skype Time stamps. They falsely indicated that he had made the scheduled calls according to the court order. Ms. Daswani later admitted to the emails that were sent by my attorney to dispute these Claims, when questioned by my attorney.
20. I mentioned Sophia's mental health during our initial meeting, told her about her therapist, including the diagnosis letter from her Therapist at Chris 180. I was advised by two different domestic violence advocates that I was in touch with, to register Sophia with a therapist in March 2021, after I noticed certain behavioral changes in her - bedwetting, clinginess, scared of the dark, grades were not the way they used to be (she was always the top of her class), she was scared to see her father's pictures on any device. Sophia was eventually diagnosed with unspecified trauma and stressor related disorder all these was ignored; no investigations were done before she recommended custody to the father. Ms Daswani was given an official Diagnosis letter from the Therapist. The Therapist did inform me that Sophia would open and disclose the trauma as sessions go on. Therapy was helping with the trauma, and stress from the

abuse, abandonment /neglect from the father. I received an email that the father had stopped her therapy sessions abruptly on the 10th of August a day after he got custody, to avoid Sophia disclosing the trauma and abuse to the therapist in his custody. The therapist was also her mandated reporter, and had made reports to DFCS during one of the sessions with Sophia. Ms. Daswani made no comment about this. On this crucial point, Ms. Daswani failed to contact Sophia's therapist at all. She gave a verbal report and recommendation without thorough investigations into Sophia's mental health before releasing her to the father's custody. These changes were first noticed in 2018 ,2019, and 2020. It became more prominent in 2021. I was told she was too young for therapy and waited till I was advised to register her in 2021. The first time I mentioned this was in 2018 to an advocate at the Domestic violence shelter.

21. I provided video evidence to Ms. Daswani, that Mr. Ogundana had put Sophia's life and health at risk, different times-. One of the video recordings that were sent to Ms. Daswani, showed that Sophia was neglected and abandoned for several months without her winter clothes, food and accommodation in 2018. He had threatened to destroy her in 2018 for disclosing the abuse to me. He had also sold his house, absconded, and left her homeless, abandoned her without all her necessities for months. Sophia fell sick during our stay at the domestic violence shelter, because he would not release her necessities. I sent videos and pictures of all our damaged properties that were left behind at an open unit storage by Mr. Ogundana. Mr. Ogundana had damaged all our properties just like he threatened he would. He took out his anger and damaged all our properties and valuables because I went against his threats and warnings by reporting the reporting the abuse. I provided all the messages and emails Mr. Ogundana had sent to threaten me that he would destroy us for returning to the United States, to report the abuse that was disclosed to me by Sophia. I also provided a video of Mr. Ogundana forcing Sophia to go on a ride that was clearly not meant for her age at the circus, Sophia was shown to be terrified that her father had forced her to go on the ride- these recordings of Sophia not safe in the father's care, were ignored by Ms. Daswani.
22. Ms. Daswani downplayed Mr. Ogundana's comment, and emoji's that were sent to me on the 4th of June 2020, told the court that Mr. Ogundana saw it as a joke, after he received the Divorce Decree in 2020. This so called "joke" was brought to the attention of the court by my Attorney during the motion to set aside hearing on the 4th of August 2020, when he made false claims. in his motion to set aside, that he was not aware of the Divorce Proceedings. Mr. Ogundana's motion to set aside was denied, because the court found out that he was aware of the divorce proceedings all along, but he intentionally ignored all court documents, made false allegations in his motion to set aside and deliberately frustrated the efforts of the process servers to serve him the divorce papers to attend any hearing. The court did not see it as a "joke" as Ms. Daswani claimed during the hearing on the 9th of August 2021

23. I told Ms. Daswani that Mr. Ogundana had threatened our lives in 2018, because I told him that I was coming back to the United States to report what Sophia had disclosed to me whilst we were in the UK. The authorities in the United Kingdom told me they could not do anything about the disclosure because they had no jurisdiction. I was blamed by Ms. Daswani and Ms. Cordle (Mr Ogundana's counsel) for traveling back to the United States to report the abuse. I explained my reasons for traveling back to the United States, despite the warnings. I stayed at the Domestic Violence shelter for safety. I followed all the safety advice and protocols by the domestic violence case workers and advocates to protect Sophia and I from further harm, till Ms. Daswani released all our private information without proper investigation. Thereby putting our lives at risk. Told her that I had messages and emails from Mr. Ogundana threatening to destroy Sophia, if I should bring her back from the United Kingdom to the United States. Submitted evidence of the most recent threatening emails in 2021 to harm and take Sophia's lives and mine. Told Ms Daswani that Mr Ogundana had gone to my landlord's residence to also threaten his life. My landlord and a friend had testified to been present at different occasions when Mr Ogundana was physically abusive towards Sophia and I. Ms Daswani ignored these facts. Mr Ogundana carried out all the threats when he found out that Sophia and I were back in the in the United States to report the abuse- he sold his properties, halted, and nullified my immigration status as he was the petitioner, quit his job, destroyed our properties and absconded. The last section of the threats to destroy Sophia was the reason we went to a Domestic Violence shelter in Gwinnett County and stayed for months. Provided the evidence, that we feared for our lives and the reason I sent a message to Mr Ogundana to go to court to file for a visitation. These were disregarded in verbal reports and recommendations that Ms. Daswani provided to the Fulton County Court in the TPO case, hence one of the reasons the case was dismissed.

24. Ms. Daswani was duly informed that Mr. Ogundana knew about Sophia's presence in the United States since 2018. I submitted evidence that Mr Ogundana willfully deserted Sophia since August 2018, but he made false claims in his motion for child modifications, that he had no idea of Sophia's whereabouts, to gain unlawful primary custody on the 18th of June 2021 at the Cobb County court. I submitted all the emails between us as requested by Ms. Daswani from 2017 till present day, passport pages, documentary evidence from Sophia's school, ticket itinerary, clearly stating that Mr. Ogundana knew that Sophia was in the United States and he willfully abandoned her from 2018 till he made the false applications in the UK in 2020, to gain another unlawful advantage of the Hague Convention in the United Kingdom, so that the court would disclose our private information to him. I also submitted evidence from different times, and dates, that I encouraged Mr. Ogundana to go to the courts to file for visitation if he wanted to see Sophia. I submitted evidence and emails that were sent to the embassy that Mr. Ogundana knew about Sophia's presence in the United States, since 2018. All my messages to him to file for visitation were ignored by Mr. Ogundana. Ms. Daswani disregarded this evidence during her

recommendations towards the best interest of Sophia. Ms. Daswani and Ms. Cordle falsely claimed parental alienation, whilst there was clear evidence from all the messages and emails, and pictures, recordings that I encouraged Mr. Ogundana at different occasions to legally file for visitation to see Sophia, but all were ignored by him, so that he would make false claims. in the courts that I intentionally kept Sophia away from him.

25. As noted in the Questionnaire about Sophia's extra-curricular activities. Sophia has been attending Kumon lessons to help with her Math, she is one of the top students at the Johns Creek center, due to the dedication from the both of us since 2019. Sophia never missed a day of her extracurricular activities. Sophia was one of the top students in her class, she was invited for the Talented Gifted program in Fulton County as a recognized Top student. The most recent after school program I just signed her up for to start the week of 10th of August- swimming lessons, piano, Spanish and Mandarin lessons, have been deliberately disregarded by Ms. Daswani. Sophia's extra-curricular activities that have helped her grades, to make her one of the most recognized in her class, by her school and teachers, the activities she used to enjoy, and look forward to, her social skills have been on hold and disrupted since she was released to the father's custody. Ms. Daswani was made aware at different occasions to remind the counsel and Mr. Ogundana to sign Sophia up for these activities, all have been ignored till date. Ms. Daswani did not consider Sophia's best interest with her education and social skills, neither has she considered her mental health, despite all concerns that have been sent to her via emails. She has not responded to those emails to follow up my concerns about Sophia till date.
26. Due to no fault of mine own, my former husband halted and nullified my immigration status because I reported the abuse to the authorities. Ms. Daswani has shown prejudice towards my immigration status as an immigrant and a Domestic Violence survivor in the United States. She has showed bias to the father because he is an America citizen, whilst I am not. Ms. Daswani has also shown bias because of her long-term personal relationship with Ms. Cordle the opposing counsel. Mr. Ogundana has also confirmed this in his emails to me that he got the custody because he is an American citizen. He also confirmed this in different emails that included verbal abuse, and threats to take Sophia's life and mine. These were submitted to the Guardian Ad Litem but ignored.
27. Evidence of abandonment, neglect, child cruelty, sexual abuse, family violence, educational neglect, emotional abuse, mental abuse, financial abuse, drug, alcohol abuse from the father towards Sophia and myself were all disregarded by Ms. Daswani. I informed Ms. Daswani about Mr. Ogundana's extensive criminal records in the US and the use of more than 15 different aliases that could be found on his criminal records, these were not investigated by Ms. Daswani.

28. My attorney, Ms. Khadizeth Samba Touré sent an email with instructions about my concerns to that should have been investigated, but Ms. Daswani has not carried out proper investigations into the willful abandonment/neglect towards Sophia from Mr. Ogundana, abuse towards Sophia, and the domestic violence towards Sophia and I.
29. On the 9th of August 2021, Ms. Daswani made no revelation in court that I had coached Sophia whilst living with me for years. She did talk about Sophia being scared of her father when she spoke with her.
30. Ms. Daswani falsely accused me of not following the court order by visiting Sophia in her former school. I have evidence to support my statement that Ms Daswani knew I had visited Sophia at her school. There are emails and messages between us- Mr. Ogundana, his counsel Ms. Cordle and my attorney. They were all aware I had been to the school to see Sophia. There were no warnings from Ms. Daswani prior to the 13th of August 2021, not to visit Sophia in school. But I have been falsely accused for not following court orders. I explained to Ms. Daswani that my Attorney had told me I could go and see Sophia at the school, I did not willingly go against the court order, as claimed by Ms. Daswani. I have been continuously victimized and falsely accused by Ms Daswani during the course of this investigations. I have also been falsely accused of going to Sophia's school on the 13th of August to give her a note. I was there on the 13th of August during her lunch break to drop off McDonalds', with the receptionist, food was checked by the staff, and no notes were found in the food. I met with the principal and assistant principal who informed me that I was not allowed to see Sophia because of the Covid precautions that were put in place.
31. Ms Daswani failed to see anything wrongdoings from Mr Ogundana not following the court order as shown in the Divorce decree, despite being aware of Sophia's whereabouts, but she would constantly chastise and accuse me.
32. I provided documents from the UK courts with the information that Mr. Ogundana was aware that Sophia was not present in the UK, but he still pursued with his false claims, to gain custody in the United States. Mr. Ogundana also made false allegations to the UK courts that Sophia was abducted and abandoned in the UK. I provided evidence that this was not the case- he knew Sophia was in the US and was with me, but he chose to ignore my messages to file for visitation in the United States. Despite the evidence proving otherwise, Ms. Daswani was biased in her

comment and recommendation during the TPO hearing, that I alienated Sophia from her father, whereas the evidence that I submitted that were ignored proved that Mr Ogundana deserted Sophia from 2018 till he his false misrepresentation during his motion and modification for child custody hearing.

33. I submitted evidence (video recordings and emails) that I attended the hearing in the UK on the 5th of May 2021 and sent copies of the emails to the courts in the UK explaining my reasons for non-attendance in June 2021. I had informed the courts prior to this date that I would reach out to my Domestic violence advocate for advice- informed the court that I would send an update of any changes if I could not attend, and the court agreed to my request. There is also a video recording of this as evidence. I sent an email to the court in the UK with an update on the 8th of June and 9th of June 2021. Ms. Daswani also told my mother during their telephone appointment on the 25th of August 2021, that I went to Sophia's school to coach her on what to say to her teacher. Ms Daswani, made these claims to my mother, despite my answers and explanations to the questions, that were sent to me via emails.
34. I have been constantly accused for not following court orders, by Ms. Daswani and Ms. Cordle. Again, mirroring Ms. Cordle's accusations despite proof to the contrary.
35. As the enrolling parent, I was not notified that Sophia had been withdrawn from her school. My messages and concerns to Ms. Daswani about the non-attendance updates from Sophia's school were ignored. Whilst they have jeopardized my right as the enrolling parent at the school. I was told I was committing a crime by not informing the school and not following the standard procedure for withdrawals.
36. Despite my overwhelming evidence to prove that Sophia and I were victims of domestic violence, the willful abandonment/neglect towards Sophia a minor by her father. Past and recent threats to our lives, damages to all our properties, businesses. My reasons for going into hiding due to the constant threats to our lives by Mr. Ogundana. My messages to Mr. Ogundana to file for visitation legally, instead of a verbal agreement that he wanted were ignored. Ms. Daswani has shown nothing but bias and prejudice to this case because of her personal relationship with Ms. Angel Cordle, Mr. Ogundana's Attorney. Ms. Daswani has shown me nothing but disdain during the course of the investigations. The tone of her voice when talking to me, she raises her voice and talks to me with contempt.

37. I also sent audio recordings from the owner of the moving company who can testify that no items were damaged by the company, and all items were properly handled, and were damaged by Mr. Ogundana, before they were contracted for the job. Our properties were in Mr. Ogundana's possession for more than 6 months. Calls and reports from the Police were ignored to release the items to me. Mr. Ogundana had damaged and stolen all our properties and valuables before he gave me access to the open unit at the storage. All evidence of these acts were ignored or belittled by Ms. Daswani.
38. The best interest of Sophia as part of the child custody recommendations to determine custody in the state of Georgia have been ignored. Ms. Daswani has not considered Mr. Ogundana's violent nature, his arrest records for Domestic violence, child cruelty, criminal records, the allegations of sexual abuse towards Sophia and my niece, past questionable behaviors towards Sophia when she was in his care, and the threat to Sophia's lives and mine have all been ignored by Ms. Daswani.
39. All my evidence confirming the Domestic Violence towards Sophia have been downplayed, disregarded, discredited by the Guardian Ad Litem.
40. Mr. Ogundana confronted his brother about his messages to me via WhatsApp that were submitted as part of my evidence. He was unhappy that his brother had shared so much with me in his messages to me via WhatsApp. Mr. Ogundana was made aware of the copies of my evidence, prior to the hearing on the 9th of August 2021- said evidence was only provided to Ms. Daswani at that time.
41. Ms. Daswani did not do a follow up investigation about the disclosure of the abuse towards my niece. This was disclosed to Ms Daswani during the initial meeting, in the questionnaire and emails, but she also told my Attorney that she learned of the said investigation after the Police debriefed her after Sophia made recent allegations of abuse by her father, that were later recanted by her.
42. My mother- Mrs. Christianah Adegite told me that Ms. Daswani did not listen to her statement, she would not let her speak, she kept cutting her off during the conversation, accused my mother that she was not present during the events she was talking about. My mother confirmed her presence and dates, but she would cut my mother off during the telephone conversation. She later claimed that my mother had a heavy accent and could not hear what she was saying.

My mother put her on speaker whilst talking to her and I was on the other side of the call and could hear Ms. Dasani's disparaging comments to my mother.

43. I submitted my evidence on the 4th of August due to the large volumes of evidence I was asked to produce with little notice beforehand- thousands of conversations were asked to be printed out, given a very limited time frame by Ms. Daswani. I apologized profusely and explained my reasons for the delay to Ms. Daswani, and apologized that my printer had broken down, and it took a while to print such large volumes of evidence. I received a telephone call on the 6th of August to submit further evidence, yet again and I did. During the process of sending the evidence Ms. Daswani sent an email, the same day that I should not send her anymore information for the rest of the weekend. She also informed me that she would be making her recommendation on the 9th of August regardless. Yet, we learned from Ms. Daswani, that she had accepted evidence from Mr. Ogundana that Sunday 8th of August thereafter.
44. My Attorney and I found out that Ms. Daswani had received information from Mr. Ogundana on Sunday 8th of August 2021, a night before the hearing. After she warned me not to send any more of my evidence few days before.
45. My mother told me that, Ms. Daswani informed her, during their telephone conversations that Sophia told the Police that I told her what to say to her teacher. This is not true. I have been open and honest with my statements and messages to Ms. Daswani from the onset, and I have been consistent in providing evidence to support my statement.
46. Sophia made an outcry in her school on the 13th of August 2021. My Attorney promptly notified Ms. Daswani, after the school called me to inform me that DFCS were on their way to see Sophia. The school also told me that they had released Sophia to the dad. Ms. Daswani deliberately tainted the investigation before it began, due to the actions she took afterwards. Ms Daswani would rather accuse me, than to admit that she disregarded my all concerns and evidence of abuse towards Sophia by her father. Sophia made an outcry to her teacher, which proved my fears all along of sexual abuse. She released Sophia to the father's custody, despite the evidence that he willfully abandoned her for years, for disclosing the abuse to me, damaged her properties, history of domestic violence, and neglect. Mr. Ogundana waited till the divorce was over, before filing motions with false accusations of abducting and abandoning Sophia in the UK to gain an unlawful advantage during the court proceedings.

47. I sent an email to Ms. Daswani on the 16th and 21st of August 2021, to check on Sophia's welfare, because no one had been able to give me an update to her whereabouts after the outcry was made by Sophia to her teacher on the 13th of August 2021. Ms. Daswani ignored my messages for few days till a subsequent email was sent to her, and she replied on the 21st of August 2021, that she had no idea of Sophia's whereabouts but she was safe and being interviewed by the Police. Another email was sent to the Ms. Daswani, during her fact-finding mission, asking her if she had used the same procedure to ask Mr. Ogundana the questions / allegations that were made against me. The emails by my attorney and I were ignored. The proposed questions were more of allegations rather than questions, proving more bias towards me. She had already made up her mind with the manner the questions were asked.
48. There is the proof from the official school bus website, that Sophia could not be released to the father on the 9th of August at 3:30 pm, for the the court order from Fulton County to take effect, because her bus was late. In addition to this there were delays that were out of my control, trying to force a 7-year-old child that was terrified of her father, to follow a court order the same day. There is evidence that I had properly followed other court orders that were ignored by Ms. Daswani and Ms. Cordle.
49. I sent an email to Ms Daswani on the 3rd of September 2021, requesting for a copy of her report. I also explained to her, that Mr Ogundana had told his brother that he had seen a copy of the report, and the messages between myself and his brother that were only shared with the Guardian Ad Litem. The email also contained facts that the other party's counsel had copies of my audio recordings -Ms Cordle confirmed during the hearing that she listened to the audio recordings prior to the hearing at the Fulton County court. I requested a copy of the audio recordings that were sent by Mr Ogundana.
50. Ms Daswani ignored my email yet again, only to reply me on the 6th of September 2021 with another set of false allegations by Mr Ogundana. This has been the systematic approach in responding to me. Ms Daswani will hardly respond to me, but would hurriedly attend to Mr ogundana's accusations, albeit false. Ms Daswani promptly adheres to the request of Ms Cordle and her client- Mr Ogundana. Ms Daswani's behavior, her late responses or non-responses to emails have also been directed towards my Attorney during the course of her fact-finding mission. She would ask if I would want her to investigate my any concerns, but would ignore my requests/concerns. But promptly attends to Mr Ogundana's requests.

51. I received an email from Ms Daswani on the 6th of September with a response to my message that was sent on the 3rd of September, explaining that she was attending to both parties' emails at the same time. She responded with false allegations made by Mr Ogundana, accusing me of manipulating and causing Sophia distress during our skype calls on the 4th of September. I was asked if I had recorded the conversations and if I had reported Sophia to her new school. I responded to the allegations with proof to dispute the false allegations made by Mr Ogundana. My evidence proved that Sophia was always in a happy mood whilst talking to me on the phone. There is also proof that there was always someone available during the conversation. I have sent a message via skype to complain that someone has been teaching Sophia to lie to me. I did not feel comfortable telling the Guardian Ad Litem due to her bias during the investigations- this was included in my emails to her.
52. During the skype call on the 4th of September, I noticed that Sophia looked unkempt, and asked if she had taken her shower. Sophia told me that she goes days without taking a shower or a bath, even during the hot weather and sweaty days from school. Sophia would be neglected for more than 4 days in a row, without a shower nor bath. She confirmed that she is allowed her to brush her teeth- only thing she does is to brush her teeth once a day. I have also noticed on record, that Sophia always scratches her body during all my calls with her, the scratches are due to the poor hygiene in the custody of her father. As Sophia's sole caretaker since she was born in the United Kingdom in 2013, Sophia never missed a day without taking a shower nor a bath in my care, she has extremely sensitive skin- She has never gone without a shower nor bath since she was born. I reminded Ms Daswani that I had mentioned to her prior to this incident that the father had the history of abandoning and neglecting Sophia, but she disregarded my concerns in her report and recommendations to release Sophia to the father's custody on the 9th of August 2021. Ms Daswani was aware of the history of neglect, by Mr Ogundana. These were submitted as evidence, but was disregarded during the formal report to the court to release Sophia to Mr Ogundana custody.
53. It should also be noted that Ms Daswani, ignored my questions and concerns as soon as she got the information, she needed for Mr ogundana and his counsel on the 6th of September 2021. My email to her on the 6th of September was ignored till date.

In conclusion, Ms. Daswani has not made a thorough fact-finding investigation due to her personal relationship with the opposing counsel Ms. Cordle. Despite the overwhelming evidence to prove Domestic violence towards Sophia and I. Past and present, proof of abandonment, neglect. Proof of false misinterpretations in motions filed by the opposing counsel and Mr. Ogundana to gain unlawful custody of Sophia. All the evidence that was submitted to Ms. Daswani, i to dispute the false claims.

made by Mr. Ogundana and the opposing counsel were ignored, overlooked, discredited, misjudged, belittled, and disregarded by Ms. Daswani. The checklist for the GAL investigation to be considered during the investigation was not properly adhered to.

Ms. Daswani already made up her mind that she was going to release Sophia to her father, before the initial meeting, and after. She has constantly showed bias, and prejudice during the investigations. No considerations for Sophia's mental health, her education, extracurricular activities, school activities, the emotional bond she shared with me her mother as the sole caretaker from birth, her custodial parent at the time. She did not investigate the problems, and concerns about the father. Sophia's relationship with her extended family, her emotional health, the bond she shared with the custodial parent at the time. She did not meet with Sophia's therapist, religious leaders-this was indicated in the questionnaire we attended a church. The best interest of Sophia:

- The love, affection, bonding and emotional ties that exists between Sophia and I were ignored.
- The love, affection, bonding and emotional ties that exist between Sophia and her cousins who is like a sister to her have been ignored.
- My capacity and disposition to continuously give Sophia love, affection and guidance and to continue her education were all ignored.
- My familiarity and knowledge of Sophia needs, since she was born was gravely ignored by the Guardian Ad Litem.
- My capacity and disposition to provide food, clothing, medical care, day-day needs, and other necessary basic care despite non payments of child support by the other parent were ignored.
- The home environment Sophia and I were both living in - we lived in a safe, gated neighborhood, one of the best school districts in the whole of Georgia. The Guardian Ad Litem disregarded this.
- The importance of continuity in Sophia's life --she has been living with me since she was born in the United Kingdom in 2013. The father has hardly been in her life, even when we were married.
- The stability and my continuous presence in Sophia's life since she was born in November 2013, was disrupted by false interpretations to the courts by Mr Ogundana and his counsel Ms Cordle.
- I was granted sole, legal and physical custody in person on the 6th of June 2020, because the court saw me fit and mentally stable. The court also saw me again in August 2020, and there was indication of instability on my part. There was no psychological evaluation, no evidence to prove otherwise during a 10-minute zoom virtual hearing, where I attended as Pro se to request for a continuance to find an attorney and change of jurisdiction (all denied) on the 18th of June 2021.
- My involvement in Sophia's educational, social, and extracurricular activities since she was born 7 years ago, till date were not taken into account during this process.
- My flexibility and employment schedule working from home to support Sophia accordingly were disregarded.

- Sophia's home, school and community record and history record came to an abrupt halt due to Ms Daswani's recommendation. Sophia's medical condition supported with a doctor's letter from the United Kingdom where she was born were all ignored to favour the other party.
- My past performance, relative abilities for future performance have been disregarded due to bias by the Guardian Ad Litem.
- All my evidence that I submitted to prove my willingness to encourage Mr Ogundana to file for visitation several times when he reached out, asking to see Sophia were ignored by Ms Daswani.
- All my evidence of domestic violence past and recent, sexual abuse, mental and physical of child abuse, Mr Ogundana's criminal history and arrest records were ignored in determining the best interest of Sophia.
- I told Ms Daswani about Mr Ogundana's substance and alcohol abuse, she ignored this too.

The best interest of Sophia according to best interest factors have been deliberately ignored to favor Mr Ogundana and his Counsel Ms Cordle.

DATE: SEPTEMBER 8TH 2021 SIGNATURE: 