April 28, 2023

Honorable Judge Susan Oki Mollway
Judge of U.S. District Court of Hawaii
300 Ala Moana Blvd C-388
Honolulu HI 96850

Your Honor,

My name is Matt Killen. I am the co-owner, manager and principal roaster of IMUA Coffee Roasters in Kapaa, Hawaii. We are members of the business community on Kauai, providing coffee for multiple cafes, bakeries, and restaurants, supporting local businesses and farmer's markets for many of our products in the shop. Prior to our arrival on the island of Kauai, I was a teacher at Rosedale Heights School of the Arts in Toronto for 17 years, 10 of which I was department head of Visual Arts and member of the admissions committee. In 2020, it became clear that teaching was no longer going to be what it once was, with significant shifts to online teaching, even after lockdowns ended; my wife Joanna Foster and I, both teachers, decided that it was time to rethink our careers. Simultaneously, discoveries of abuse of our children at the hands of family members led us to decide to sever ties with family in Toronto and leave Canada entirely. The family wished to live by water, in a warmer climate, in a rural environment and get into farming. I preferred to live in America, but did not wish to live near the Atlantic or Gulf of Mexico due to the frequency of hurricanes in this region. Joanna and I had visited Kauai on our belated honeymoon in 2014 (the laid-back, rural, less touristy nature of the island was appealing); the island was also as far away from our old lives as we could get. I proposed the island as our new home and the rest of the family enthusiastically agreed. We found a business for sale and embarked on the next chapter of our lives in early 2022.

It appears, however, that Mr. Paul Thompson is now creating conflict which now brings our old lives back into the present. I have known Paul since 2010. We were introduced when he began dating my wife's sister, Jess. Their relationship became tumultuous very early on. Joanna and I were concerned for Jess' well-being as she described their arguments, especially as the wedding in 2013 drew nearer; Jess was committed to the relationship, however. It became clear that Paul had a serious and unpredictable temper. We were also surprised by hate speech, particularly with regards to Muslims, that he expressed, as well as comments about females' inferiority to males, particularly with regards to academics.

We were uncertain as to whether any abuse was physical, but there was definite emotional abuse of Jess. Within hours of their return from their honeymoon in June of 2013, an argument led Paul to kick Jess out of their matrimonial home, change the locks, and empty their joint account. Jess did not understand how a small disagreement out of the blue led to this behaviour. With only a purse filled with a few belongings, Jess, who was pregnant with their first child at the time, came to stay with us in the spare room in our home. When she returned to the house to get more belongings (clean clothes, etc), Paul refused her entry and called the police. The police explained to him that he had no right to deny her entry to their matrimonial home; Jess was permitted to gather a few belongings in two bags. She returned to our home, where she remained for a period of 3 weeks. Despite this series of events, Jess was quite insistent on working things out; Joanna and I were quite surprised when she eventually returned to their house. This marked the beginning of our monitoring Jess' well-being more closely.

Following the birth of their first child, Paul only occasionally accompanied Jess to weekends at the cottage or the ski chalet; she was usually a single mother during these time periods. When he was around, he was often angry and the atmosphere was usually quite tense. He would often disappear for hours at a time.

The cottage consisted of multiple buildings and could accommodate multiple extended families simultaneously. One building in particular was self-contained, with its own kitchen, my wife and each of her siblings each having a turn staying for a week or two at a time. In the summer of

2014, during one of our turns in this particular building, Jess and Paul, with their newborn son, invited themselves over. Our eldest son, who was 3 at the time, was very excited about the baby and jumping about, which was clearly upsetting to Paul. The situation escalated to the point where Paul got so angry at my wife and her parenting style that he raised his fist at her, threatening to punch her. Joanna was surprised, shocked, but defiant, refusing to cower to his threat. It was at this time that I arrived in the room. Ironically, despite the fact that he had just physically threatened my wife, it was up to me to take Paul aside, calm him down, and be an ear for him. He expressed that he felt trapped, forced into both marriage and fatherhood.

Over time, Paul's behaviour became more volatile. He argued with Jess more openly at family gatherings, although he attended these rarely. On Christmas eve of 2015, Paul got upset and left the family gathering at the ski chalet just as the rest of the family was arriving. Jess and their son James celebrated Christmas without him that year; this was James' first Christmas. He returned a few days later to take them home. If Paul came to the cottage or the ski chalet with Jess and their children, he would often leave her there, effectively stranding her until he returned with their vehicle.

In January of 2018, on the day of James' 4th birthday, Paul got angry at Jess and drove away, leaving James crying in the driveway instead of taking him to school. There was meant to be a birthday celebration for James at school, but Paul had left with everything in his truck, as well as James' winter coat; he was unreachable and did not return until much later that day. Jess was at home with their infant son Christopher at the time and could not take James to school (as I recall, she did not have a working vehicle of her own at that time); a neighbour was enlisted to drop James off, albeit late and without a coat or birthday paraphernalia. James was understandably heartbroken.

As most weekends in the winter were spent without Paul at the ski chalet, and most of the summer was similarly spent without him at the cottage, Joanna and I and our children spent considerable time with Jess and her kids; during these times, I effectively served as an alternate father figure to their children, a role I reluctantly accepted. As Jess was often caring for baby Christopher, it was I who often dropped off or picked up James for summer camp or ski lessons. I ran out to get groceries for both households (albeit with financial contributions from Jess). I prepared most lunches and dinners for the two families. I played games with James and our boys (he was very close to our middle son, Ronan – essentially best friends at the time).

Their matrimonial home was in fact owned by Paul's father, a fact that made Jess not feel comfortable. They eventually purchased a house of their own, but extensive renovations were needed and these took time. Things became so heated that Jess and the kids moved out of Paul's father's house and into her parents' house. As renovations had stalled and communication between Jess and Paul was not good, it was unclear if Jess and the kids would be reunited with Paul under one roof. After almost a year after purchase of the house, the work was completed and everyone moved in. During the summer, when we were not at the cottage, we came to visit Jess and the kids and use the pool; Paul was never home. I was always the parent in the pool, playing with my three kids and Jess' two. My kids have very little recollection of any interaction with Paul during any of this time period.

In November of 2019, Joanna and I took a short 4-day trip to mark our 10th wedding anniversary. Despite their turbulent history, we still felt Jess was an excellent caregiver and believed our children were safer in her care than anyone else's (she is still listed as the caregiver for the children in our wills, should anything ever happen to us). Paul was at the house briefly on the first day, got angry at Ronan and James, packed his things and left. Our children did not see him again during their stay. Jess did not know where he went and, at this point in their relationship, found things easier to manage when he was gone anyhow.

During the first lockdown in the spring of 2020, Jess was so disappointed by the online learning that James' school provided that she effectively began homeschooling her children. She did not send her kids back in the fall. As educators ourselves, our observation was that she was an

excellent, committed homeschool parent/teacher. She spent much of the lockdown at the ski chalet, as there was much more space for the children to run around outside and for her to take them to get groceries (as the town in which the ski chalet was located was much smaller than Toronto, it was much easier to operate as an effectively single parent there). Paul was rarely there during the entirety of the lockdown.

Joanna and I both returned to teaching in the fall of 2020. All three of our children were enrolled at Howlett Academy in Toronto in September. However, due to changes in the school's masking policy mid-semester, as well as an abuse incident in one of the bathrooms, all three of our children were pulled from the school by the end of October. As I still had a full, albeit modified teaching schedule for a few more weeks, Jess taught our children at her house until a more permanent homeschool teaching situation could be found. She did an excellent job and supplemented their learning with lots of physical activity and enriching field trips whenever possible. During this period of time, our children never saw Paul. Both families also spent holidays such as Halloween together at the ski chalet. Again, Paul was not present.

It was only late in the summer of 2020 that Joanna and Jess (and I by proxy) discovered Liana Shanti. We had already started limiting contact with Joanna and Jess' parents during the first lockdown; several pieces of information had surfaced during the first lockdown that concerned us and led us to cease ever leaving our children alone with them. By Christmas we were no longer seeing them at all. Liana's Mother Wound and Father Wound programs were helping with our path to healing. Other than the programs' suggestion that one remove toxic influences from one's life, Liana never actually told us to do anything – all decisions were entirely made by ourselves, as these were the conclusions we were led to during our personal healing process. The only thing Liana actually tells her students to do is to love their children and themselves unconditionally. Thus all healing and decision-making is done entirely by the individual. Liana can clearly not be blamed for any of the previous conflict with Paul; her programs merely gave Jess the confidence (through her healing process) to decide that she'd had enough.

During many of their conflicts, Paul used to threaten to divorce Jess. If we understood correctly, the only reason he did not follow through with his threats was that he was unwilling to pay child support. Again, throughout their history, Paul was unavailable as a father a good deal of the time and though Jess was a stay-at-home Mom, asked her to contribute financially for all of their activities and half of all of their household expenses. Jess was getting a monthly allowance from Robert and Julia Foster in order to pay for this. Jess decided she had had enough of the marriage towards the end of 2020 and began considering seperation.

Jess and Paul decided to begin the process of ending their marriage in the spring of 2021. They began the process of selling their house. Jess and her kids moved out in the summer of 2021 and relocated to Oakville, Ontario. Paul was away for weeks at a time and Jess did not know where he was. In the meantime, Joanna and I had decided to leave Toronto and our teaching careers. We moved to Guelph, Ontario, while we listed our house in Toronto, a stepping stone to our move to Kauai. Joanna and Jess had already sold their ski chalet in Collingwood, Ontario in the spring of 2021.

The Canadian political landscape, real estate prices, as well as a desire to live in a different climate, prompted Jess to want to move to Florida. Although their divorce agreement was not yet finalized, Paul was willing to accept the move, providing Jess chose to live within a reasonable distance from Paul's parents' home in Florida so that he could see the kids. Jess crossed the border in November of 2021 in order to set up her living arrangements in the greater Tampa area. James and Christopher remained with Paul until she was ready to receive them. Paul drove them to Jess 3 days later, as well as some of her belongings.

In the last 3 weeks before our move to the United States, our kids went to stay with Jess in Florida so that we could settle up our affairs in Canada. Our kids flew to Jess a few days after Christmas. We had found our business in Kauai, needed to set up our paperwork, banking, tax

numbers (etc), as well as dispose of everything we owned (as moving our belongings to Kauai was more expensive than starting over); we were set to take over the business February 1st, 2022. The 3 weeks we were away from our children were the hardest three weeks of our lives, but we know our children were in excellent hands in Jess' care.

Unfortunately, things were not so straightforward for her own children. Paul's behaviour was erratic. He would often drive up and block her van as she was getting ready to take the kids to an activity. He would yell at her in the driveway; our three children were too afraid to leave the vehicle when he was around. Around New Years' Eve, we sent Jess funds to take all of the kids to a resort in Orlando and enjoy the festivities. Paul refused to let his kids go, and they spent New Years' Eve at his parents condo watching tv, in tears that they were missing the festivities (they were permitted to briefly communicate with Jess via FaceTime). They were so resentful of the missed opportunity that James was hostile with our children for the rest of their stay with Jess.

We arrived in Florida to pick up our children on January 13th. Jess did not have her children with her at that time, so we did not see them. Paul did not always communicate when she was getting her children back. We remained in Florida for a few days to celebrate our eldest son's birthday before flying to Kauai on the 19th.

Communication with Jess became sporadic after a few weeks, and we were busy getting started taking over our new business. Jess had purchased a house in Florida and was setting up her new business. We were shocked to hear that Paul, who had rarely had the boys in his care for more than a couple nights at a time, had taken the boys from their home, dog, mother and life in Florida to Toronto and was refusing to return them in the spring of 2022. His previous absence as a father was a stark contrast to wanting what appeared to be sole custody. He returned to Canada with the children, despite Jess not having given a letter of consent or even their passports. It was months before she could track down where he was staying in order to have him served with divorce papers; he appeared to be evading Jess hopping from one friend's house to another, providing questionable stability for his children.

His words with regards to his description of his wife as a supposedly unfit parent seem completely unjustified, given his personal history. As for Liana Shanti's influence, none of this seems to involve her in any capacity, and certainly not before more than 10 years into Jess and Paul's relationship history.

I hope this statement will shed light on the credibility of Paul's statements.



Matt Killen