

# The Non-Violence Alliance

---

386 Main Street  
Middletown, CT 06457

I am David Mandel, MA, a family violence consultant to the Department of Children and Families in Connecticut. Being duly sworn, I do hereby depose and say that the following is the truth to the best of my knowledge and belief:

My qualifications for providing expert opinion in the matter of the Removal of Violet (1/15/90) and Paul Smith (12/19/92) from their father, Tim Smith (11/8/56) are the following<sup>1</sup>: I am a co-founding partner in the Non-Violence Alliance, a private agency specializing in working with perpetrators of family violence. I have seventeen years of clinical experience with this population. For the past eight years I have been the Department of Children and Families' primary consultant on matters pertaining to family violence perpetrators. In this role, I train all new social workers and investigators, provide regular case consultation and evaluations, and provide advice on matters related to policy and procedures. In addition to my clinical experience, I have authored numerous articles, training and program development materials regarding interventions with family violence perpetrators, including a training curriculum for all state approved batterer intervention facilitators in Texas. I am regularly invited to speak inside and outside of Connecticut on interventions with family violence perpetrators. I am currently conducting research into various aspects of interventions with family violence perpetrators including (a) a national study of batterer's perceptions of their children's exposure to their violence and abuse, (b) methods for improving child protection's response to family violence perpetrator's and (c) screening for family violence perpetrators in medical settings. Papers on these efforts have been accepted to national conferences in the field. In Connecticut, I have been repeatedly hired to provide professional training in this specialization for new Family Relations counselors for the Judicial Branch. I currently act as a consultant to the Connecticut Department of Corrections on research, training and program development issues related to family violence perpetrators. I hold a Master's in Psychology and Counseling from Goddard College.

The following is my expert opinion based on my review of the documentation and information presented to me to by the Department of Children and Families:

I strongly support the decision made by the Department of Children and Families to remove the children from Mr. Smith's custody due to (a) the imminent risk of physical harm and (b) the serious adverse emotional impact Mr. Smith's behavior appears to have on his children. Mr. Smith's history of violence, terrorist threats, emotional abuse and control combined with his escalating response to his children's help seeking behavior raises valid concerns about the possibility of new and serious violence and emotional abuse if the children are returned to his custody at this time.

Mr. Smith's behavior, as reported by the children and family members, and documented in court records, indicates a long-term, severe, persistent and escalating pattern of serious physical violence, and terrorist threats and actions. This pattern appears to date back to a period, at minimum, preceding the death of the children's mother, Samantha Jones. At this time, Ms. Jones was granted a

---

<sup>1</sup> The names and identifying facts in this note have been changed to protect confidentiality.

Relief from Abuse Order in Connecticut Superior Court, in which she swore “His is constantly calling me a “fucking cunt” in front of the children...He has a gun and is threatening to blow my head off.”

In regards to Violet and Paul, Mr. Smith’s violence, terrorist threats and actions, control and cruelty appears to have created an atmosphere of fear, intimidation and unpredictability for Violet and Paul. The record documents multiple instances of Mr. Smith physically assaulting his children, including but not limited to:

- Hitting Violet with wooden stick
- Pushing and grabbing Violet by the throat
- Hitting Paul on the thigh with a piece of wood
- Kicking Violet in thigh
- Grabbing Paul by his shoulders

Mr. Smith’s willingness to act in a physically assaultive manner takes on an additional level of concern when coupled with Mr. Smith’s terrorizing and controlling behaviors. The children report that on a regular basis, Mr. Smith threatens to hit or “pound” them. Violet reports that Mr. Smith has threatened to “punch her face off” and “feed her to the wild dogs.” (During an interview with a social worker, Mr. Smith admitted to threatening the children, claiming that they should not take him seriously when he makes his threats.) Moreover, the children report that Mr. Smith takes them to remote locations to yell and discipline them. He has repeatedly interrupted Violet’s sleep by coming into her room to rip off covers, yell and shake her. Disregarding the normal developmental needs of his children, Mr. Smith has repeatedly exercised extreme and unhealthy levels of control over every aspect of the children’s daily routine. Using his power over their environment and physical well-being, Mr. Smith has controlled and destroyed Violet’s clothing, severely limited her room decorations, deprived her of contact with friends and family, and used deprivation of food as a form of punishment. Based on the reports from the children, it would be fair to compare Mr. Smith’s behavior as being more akin to an abusive prison guard than a caring parent.

Mr. Smith’s pattern of behavior is consistent with the profile of family violence perpetrators who engage in coercive control tactics, deny responsibility for this behavior and deny its negative impact on others. Additionally, Mr. Smith’s substance abuse appears to aggravate his violent and abuse towards their children.

Despite repeated attempts to address his behaviors by the Department (and others), Mr. Smith has persisted in these patterns of behavior and denied their impact on the children. Moreover, the children report that in response to their efforts to protect themselves and seek assistance for the family, Mr. Smith escalates his violence, intimidation, manipulation and control. Mr. Smith’s history of coercive control, violating boundaries, substance abuse, and willingness to use violence and the threats of violence to exercise power over his children makes it impossible to predict the extent to which Mr. Smith will go to maintain this control over his children.

Submitted by: \_\_\_\_\_  
David Mandel, MA

Subscribed and sworn before me this \_\_\_\_\_ day of \_\_\_\_\_, 2XXX.

Notary Public: \_\_\_\_\_ Expiration Date: \_\_\_\_\_