

IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY,  
FLORIDA

FAMILY DIVISION

CASE NO: 502010DR013957XXXXSB

IN REM: THE MATTER OF,                      DIVISION: FZ  
  
DENNIS NIBUS,

Petitioner/Father,

And

HEATHER HIRONIMUS,

Respondent/Mother

\_\_\_\_\_ /

**FATHER'S VERIFIED MOTION**  
**FOR PSYCHOLOGICAL EVALUATION OF THE MOTHER**

COMES NOW the Petitioner/Father, DENNIS NEBUS, by and through his undersigned attorneys, pursuant to Fla. Fam. L.R.P. 12.360 and Fla. R. Civ. P. 1.360(a)(1)(B) and files this his Motion for Psychological Evaluation of the Mother, and as grounds therefor would stake the following:

1. The mental condition of the Mother is in issue in this matter as set forth herein.

2. On March 10, 2015 this Honorable Court entered an Order Granting Father's Emergency Motion for Contempt and Other Relief on Orders of May 9, 2014 & December 23, 2014 Filed on February 20, 2015 (D.E. 147); and Father's Verified second Emergency Motion for

Contempt and Injunctive Relief on Orders of May 9, 2014 & December 23, 2014 Filed on February 24, 2015 (D.E. 150) ; and Father's Third Emergency Motion for Contempt and Other Relief File March 4, 2015 (D.E. 158) (D.E. 179) . In its March 10, 2015 Order, the Court found the Mother to be in willful contempt of this Court's Orders and stated (all of the orders and social media postings are attached to the Father's Supplemental Petition for Modification which was filed herein, and are incorporated herein by reference as if fully set forth herein) :

1. The Court finds that the Orders that have been entered in this matter have been clear and unambiguous in their requirement, including the prohibition against making this child a subject of unfortunate and potentially harmful exposure on the internet.
2. There is no doubt that the Mother, HEATHER HIRONIMUS, knew exactly what she was doing and disclosing the likenesses of the child and making the child an object of curiosity and worse on the internet.

\* \* \*

4. Due to the Mother's actions, this child has been placed in a light that provides too much scrutiny for a little boy. The Mother is to blame for that.
5. The Mother's conduct in taking off with the child, denying the Father his court ordered timesharing with the child was willful. For her to have left on or about the day after the Father brought the child back to her and to have provided no contact information, no itinerary, no information whatsoever, leaving the Father only to wonder about the whereabouts of the child is reprehensible.

\* \* \* \*

11. The Court finds the Mother is in willful contempt of this Court's Orders.
12. The Mother's having allowed and having facilitated the likeness of the boy's picture or face and name to have been plastered all over the internet was in direct and contemptuous violation of this Court's Orders.
13. The Mother's behavior made it necessary for the Father to have utilized counsel in this matter in order for the Court to reign in this case; ....

3. Beginning about the time that the Father's Motion for Enforcement was heard by this Court at hearings on or about March 25, 2014 through May 7, 2014 and ruled upon on May 9, 2014, the Mother decided to open up a "GoFundMe" website page in order to raise funds to resist the Father's enforcement action.

4. By publishing the parties' child's name on this website and asking for funds to prevent the child from being circumcised, the Mother drew the attention of other various individuals, activist groups and organizations, including but not limited to the "Intactivists," "Bloodstained Men," "Doctors Against Circumcision," and others devoted to prevent circumcisions.

5. The Mother became involved with these groups and organizations, in a "cult-like" manner, sometime in the Spring of 2014 and continues to be involved with these individuals and groups at the present time. The Mother attended a gathering at one of their homes in November, 2014 where she was photographed with members of these organizations. The Mother cooperated with these organizations and made the individuals who make-up these organizations, her \*friends\* on Facebook. She communicated, and continues to communicate, with these individuals and provide them with information about the parties' young son, including but not limited to photographs of the parties' son.

6. On December 23, 2014 the parties entered into an Agreed Order on Father's Amended Expedited Motion for Injunctive Relief

and Motion for Contempt Dated June 16, 2014 (D.E. 111) which provided:

3. The parties acknowledge and agree that publicity and posting made by the press, television and social media may have negative repercussions on the child in the future, and the parties have entered into this agreed order to shield the child from same.
4. In order to protect the child from any exploitation, now and in the future, the parties agree to make efforts to hide and/or conceal from the public, the child's identity and his relation to the legal proceedings between the parties. The parties agree to make all efforts to maintain the child's name, personal information and/or identity through photographs, as it may relate to any and all legal proceedings between the parties. The parties agree to cooperate in efforts taken by either party to continue to hide and/or conceal the child's identity, and his relation to the legal proceedings between the parties.
5. Moreover, until further court order, the parties shall not give, transmit, post and/or participate in any interview, production of documents and/or information to the media, press, television, social media or worldwide web, that is related to and/or associated with the legal proceedings in the above captioned case or their case known as 4D14-1744, currently before the Fourth District Court of Appeal.
6. The Mother, Heather Hironimus, shall not start a GoFundMe web page, other similar web page, or fund raiser in order to raise money for her legal fees and costs in this case, appellate case or any case in the future related to and/or associated with these legal proceedings. Any and all efforts made by the Mother to raise funds for her legal fees and costs shall not mention or be affiliated with the child in any way. The parents agree to notify any and all groups, fundraising legal fees on their

behalf to cease and desist using the child's name, personal information and/or identity through photographs, as it may relate to any and all legal proceedings between the parties.

7. Notwithstanding the prior court orders, the Mother continues to keep the individuals and organizations informed about everything that was happening in court proceedings and everything that was happening in her son's life, including but not limited to when the Father scheduled doctor's appointments, and the scheduling of circumcision procedures on multiple occasions.

8. The Mother used, and continues to use the internet, these "friends" and organizations to raise funds to retain attorneys both for the instant matter, and to defend her in a criminal proceeding stemming from violation of this Court's Orders, and in a frivolous federal lawsuit she filed in the Southern District of Florida against all of the Judges of the 15th Judicial Circuit of Florida, all Sheriffs of the State of Florida, and the Father (which was dismissed by the Mother the day after a hearing on jurisdiction).

9. In January, 2015, the surgeon who previously testified in court in this matter agreed to perform the circumcision. As soon as the Mother was informed of same, pursuant to that Parties' Parenting Plan, the Mother, through her online "friends" caused the surgeon's office to be picketed and staged a protest outside of the surgeon's office on January 10, 11 and 12, 2015. Information about the surgeon was posted on their websites, threats were made and the physician changed his mind and refused to perform the circumcision.

10. On February 18, 2015 the Father took the child to the pediatrician for a pre-op appointment, as he found another surgeon willing to perform the circumcision. The Mother was notified, per the Parenting Plan of this appointment, and showed up with an individual from the groups with whom she has affiliated herself, as set forth hereinabove. The individual remained outside in the doctor's office

parking lot, but was on the telephone with the Mother virtually the entire time that she was in the pediatrician's office in front of the pediatrician, the Father and child. The Mother created a scene in the pediatrician's office resulting in the pediatrician having to consult with his office's lawyers during the child's visit. The Mother was telling everyone in the pediatrician's office that she was going to sue everyone; that she did not give her consent for the pediatrician to touch her son; and made it clear in front of the child that she opposed the circumcision to the detriment of the child who witnessed her rantings and ravings, in violation of the Court Order of May 9, 2014 that prohibited her from letting the child know that she opposed the circumcision. She met with the individual in the parking lot after the child's doctor visit concluded.

11. On February 19, 2015 the Mother again interfered with another surgeon who had agreed to perform the circumcision. She went to the office of this physician and threatened to sue him and told him that she did not give her consent for the circumcision and that he better not touch her son.

12. On February 20, 2015 the surgeon's office contacted the Father and advised him that the doctor would not perform the surgery due to numerous calls his office received threatening to kill the physician and his staff, and burn down the office, should he do the circumcision. The police were called and the physician had to shut down his office and send everyone home for their safety. The Father was informed that the Mother and/or her "friends," were following the Father or keeping track of him, as the Mother told them that she knew what time the Father was at the surgeon's office dropping off paperwork. All of the Father's actions, child's appointments etc. were posted onto the websites of these organizations. A protest occurred at the surgeon's office on February 23, 2015 organized by the Mother's "friends" and associates on line.

13. On the evening of February 23, 2015 the Father went to the Mother's residence, where she resides with her mother, Mary Hironimus, to pick up the parties' son for his regularly scheduled timesharing. As far as the Mother knew at that time, the procedure was scheduled for sometime the following day, on February 24, 2015. When the Father arrived, there was no answer. The Mother had abducted the child and left.

14. The Father did not see the parties' child again until May 14, 2015. During the time period from February 23, 2015 through May 14, 2015 the Father did not know the whereabouts of the child. He was not permitted to speak with him; his phone calls were not answered or returned by the Mother. The maternal grandmother also was not present and had her phone turned off as well. The Court entered a Child Pick-Up Order and Writ of Bodily Attachment against the Mother at the time.

15. On February 23, 2015 posts by the "intactivists" suggested that they oped that the Mother flees today and that she should leave the country. The Mother's "friends" and online associates knew that she had taken the child, demonstrating that she had been in touch with the cult-like activists.

16. On February 27, 2015 Brother K, one of the Mother's Facebook "friends" and member of the activist groups, posted that the child was safe tonight.

17. Each time there has been a hearing in this matter, the Mother has notified her Facebook "friends" and online associates and they publicize it; protest with posters that use the minor child's name and photographs; and try to get as much publicity as possible for this private matter, for their own cause. This matter has been on the television news, in newspapers, blogs etc. throughout South Florida, nationally and internationally.

18. On March 7, 2015 the Mother was urged by her Facebook “friends” and/or online associates to ask for asylum for herself and the parties’ child in Canada.

19. During this time period from February 2015 through May 2015, death threats were made against the Court, the Father, his attorneys, and the physicians whose names were made public by the Mother, by the Mother’s Facebook “friends” and her online associates.

20. On May 14, 2015 the Mother was arrested for interference with a custodial order from this Court. Ultimately, she admitted her violation of the timesharing schedule before the criminal court as part of a pretrial intervention program.

21. On May 21, 2015 notwithstanding her arrest, the Mother’s “friends” and online associates posted a notice that they should write letters to all doctors within a 100 mile radius advising them of the Mother’s family medical history and why the doctors should not perform a circumcision on the child.

22. On May 22, 2015 there were more posts on the Mother’s “friends” website that they Mother and child should apply to the New Zealand Embassy and that they should break the Mother out of jail and kidnap the child and take him underground to get out of the country.

23. On May 19, 2015 there was an Order of No Contact in effect as a condition of the Mother’s bond in the criminal action. Notwithstanding same, the Mother’s sister texted and/or called the Father on May 23 and 24, 2015, as did the maternal grandmother, in an obvious attempt to circumvent the Court’s order that the Mother not have any direct or indirect contact with the minor child.

24. On May 27, 2015, the Father was advised that the child had not been brought in for his four year immunization shots, which was important for the child’s health. The Father brought the child in to the pediatrician for his four year old check-up and at that time signed a new HIPPA form with the child’s pediatrician so that the Mother would not have access, per this Court’s order, to the child’s medical



records so that more disclosure of the child's doctor visits etc would not be released on any website.

25. Notwithstanding this, on May 28, 2015, the Mother breached the pediatrician's portal and changed all of the information in it back to her name and her address, so that she, and not the Father, would have access. The Mother accessed the child's medical records in this manner, and gave the records to her then attorney, Mr. Hunker.

26. The Father had arranged for a third surgeon to perform the circumcision at a local hospital. On June 8, 2015 the Mother's attorney filed an "Emergency" Motion and attached to it all of the child's medical records obtained by the Mother in contravention of this Court's orders and in violation of the HIPPA document signed by the Father. These confidential medical records of this child, now became public information contained in this Court's file and on the Mother's "friend" websites.

27. The new surgeon who had agreed to do the surgery became the target of posts on the website, and threats should he do the scheduled surgery, including, but not limited, to his malpractice carrier's information, etc. The hospital, where the surgery was supposed to be performed, also received threats including, but not limited to, threats by the group Anonymous threatening to hack the hospital's computers and release confidential information. The hospital was forced to call in the Secret Service and law enforcement for this terrorist threat.

28. As a result, the evening prior to the scheduled surgery, the hospital and the third surgeon decided not to perform the surgery and notified the Father that the surgery was not going to be performed the following morning. In addition, the hospital, against the Father's wishes, put out posts on its own website (that had been flooded by the Mother's associates and "friends") that the child was not a patient of the hospital or surgeon. The hospital was picketed by protesters on the days leading up to the scheduled surgery.

29. The required pre-op appointments to get the child ready for surgery then having the surgery cancelled at the last moment due to threats and intimidation, is and was detrimental to the child, and has all been caused by the Mother's actions and the actions of the people with whom she continues to associate and confer.

30. On June 10, 2015 the Mother's "friends" and online associates posted that complaints about the Father should be made to Child Protective Services, once again in an attempt to make the Father look bad and have the child removed from him. More of these posts followed on June 12, 2015. These complaints were made by individuals who had not seen the child nor the Father, and who were making these baseless, false allegations as part of the Mother's organized campaign against the Father. This resulted in multiple unnecessary and unwarranted visits from DCF to the Father's residence; interviews with the child, Father and others, and unnecessary trauma and interruption of the minor child's family life with his father and the father's relatives.

31. Upon information and belief, the Mother and/or her cohorts, reported to the Drug Enforcement Agency (DEA) that the Father was in possession of illegal drugs and/or paraphernalia which caused the DEA to appear at his residence, in front of the child to investigate the matter, which was totally unfounded.

32. On June 12, 2015 one of the Mother's "friends" and online associates posted that someone needs to carry out their own justice on the disgusting human beings. There was also another post to murder the Father, judge and doctor on this same date.

33. The attention brought about by the Mother and her "friends" and on line associates caused the Father to be followed when he has had the child in the car with him compromising the child's safety and that of the Father. On one of these occasions, an individual got out of another car and threw water on the Father through the open driver's side window. The child was frightened and had to be calmed down

and reassured by the Father that everything was okay. On other occasions, there have been people in cars stalking the Father's residence.

34. On July 16, 2015 the fundraising for the Mother continued with the maternal grandmother, with whom the Mother lives, thanking supporters for the funds they are donating.

35. On July 18, 2015 a post was made on one of the websites stating that 100% of all proceeds from TeeSpring shirt sales goes directly to the Mother's legal fund. Again, using the child's name and likeness in violation of Florida law and this Court's orders.

36. The child's name, face, photographs, medical records, family history, addresses, all personal information has been posted on the internet for the world to see, by his Mother and her "friends."

37. The child will now have to grow up living with very personal information online about his private parts, for the rest of his life because the Mother refused to obey this Court's Orders. The child was kidnapped by his mother, with his whereabouts unknown to the Father, for almost three months, in a shelter in another county. The Mother, her family and "friends" have attempted to alienate the child from his father. The Mother told the child that the Father was going to "cut off his pee pee." During that time, the child was apparently living in a shelter for battered women, notwithstanding that the Mother is not and was not a battered woman, nor was the child a victim of domestic violence. The Office of the State Attorney in Palm Beach County and Palm Beach County (and Broward County) Police had to become involved as the Child Pick-Up Order and Write of Bodily Attachment entered by this Court was not deemed to be sufficient for police to actually enter the Broward County shelter and remove the child and mother from inside the shelter.

38. As a result, the child had to be removed by police from this shelter. Again, a detrimental and unnecessary drama and trauma to the

parties' child to be rescued by police, caused by the willful actions of his Mother.

39. The Mother's friends" and her family continue to be involved with the Mother online and are dangerous to the safety, welfare and privacy of this child. The Mother continues to flagrantly disobey this Court's Orders to the detriment of the parties' child, and has shown no insight into, nor remorse for the harm she is causing the child.

40. Upon information and belief, the Mother is unemployed and has not been able to hold down a job for at least the entire pendency of this action from early 2014 through the present time.

41. During the time that the Mother kidnapped and secreted the parties' child from his Father, the Mother attempted to alienate the child from his Father, in part, by telling him serious untruths about the Father.

42. As the Mother's wrongful and harmful misconduct and disobeying of court orders continues, notwithstanding the orders of this Court; and she is entrenched in the associations with her Facebook "friends" in a cult-like manner; and she is seeking contact with the parties' minor child (whom she continues to hurt by her actions and associations), her mental health is in issue and a psychological evaluation of the Mother should be ordered by this Court, prior to any timesharing occurring in any manner whatsoever for the safety and well being of the minor child.

43. After the child was reunited with his Father, the Father learned that the child had been told by the Mother that his Father was dead and that the child would never see his Father again.

44. Given the Mother's actions in this matter, the Father has a well-founded and legitimate fear that the Mother has been and will continue to consort with these cult-like groups and that until such time as she is evaluated by a psychological professional and the Court has

an opportunity to evaluate any reports, that timesharing should not take place, in that the child could be abducted once again.

WHEREFORE, the Father prays that this Honorable Court order a psychological evaluation of the Mother for the reasons set forth herein, and for such other and further relief as to the Court shall see just and proper.

Under penalties of perjury I declare that I have read the foregoing document and that the facts stated in it are true to the best of my knowledge and belief.

Date: September 3, 2015

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Dennis Nebus, Father

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