

IN THE CIRCUIT COURT OF  
THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

IN RE: FAMILY DIVISION (04)

J.M., a/k/a JASON MILLER

CASE NO.: 17-016674 FC 17

Petitioner/Father,

and

A.J.D., a/k/a ARLENE J. DELGADO

Respondent/Mother.

\_\_\_\_\_ /

**MOTHER'S SUPPLEMENT TO MOTHER'S MARCH 2018 MOTION FOR  
COURT TO CONSIDER PSYCHOLOGICAL EVALUATION OF THE FATHER**

Mother is concerned regarding the mental health of the Father ("Mr. Miller") and his ability to provide a stable mental environment when around the child, particularly given information shared with the Mother about Mr. Miller's past. Mr. Miller's mental and psychological health is at issue and in controversy, and good cause exists, per the requirements of Florida Rule 12.360. Mother requests a psychological evaluation of Mr. Miller, should this honorable Court deem such proper.

In summer 2018, Mother was informed as follows:

1. In 2012, Mr. Miller, while working for Jamestown Associates, was working closely with the firm's Florida clients.
2. As part of this, Mr. Miller spent significant time in Orlando, FL.
3. Evenings with clients and colleagues sometimes entailed steakhouse dinners followed by strip clubs and/or patronage of escorts for some of the participants.
4. During one such evening, Mr. Miller and other colleagues/clients visited Rachel's Gentleman's Club, a strip club in Orlando (which also has a West Palm Beach location).
5. At the time, Mr. Miller was already married to his wife (whom he married in July 2008) and had a 4-year-old daughter (who was born in late 2008).
6. Mr. Miller met a stripper that evening, which will be referred to herein as "Jane Doe" (Mother has individual's full name).
7. **Mr. Miller had sexual intercourse with Jane Doe and continued a sexual relationship with her for some unknown period of time.**
8. **Jane Doe became pregnant.**
9. Shortly thereafter, according to Jane Doe, Mr. Miller visited her at her apartment with a Smoothie beverage.

10. Unbeknownst to Jane Doe, the Smoothie **contained an abortion bill**.
11. The pill induced an abortion, and Jane Doe wound up in a hospital emergency room, bleeding heavily and nearly went into a coma.
12. The unborn child died.
13. Jane Doe herself was hospitalized for two days, the abortion pill possibly reacting with potential street drugs in her system at the time she drank the Smoothie.
14. Upon leaving the hospital, a rightly enraged Jane Doe contacted the staffers of local politicians with whom Mr. Miller had been in attendance at Rachel's the night they met.
15. Mr. Miller then, in a panic, attempted to have Jane Doe sign a non-disclosure agreement ("NDA"), presumably in exchange for a sum of money.
16. It is unknown if Jane Doe signed the NDA but, likely overwhelmed, she nonetheless quietly went away.
17. The story circulated in Florida political circles for several years, but was not of interest until 2016, when Mr. Miller was on national TV as an official of the Trump Campaign and, subsequent to Trump's win, being discussed for a senior role in the White House.
18. A private investigator was hired in late 2016 by some 'very powerful people' to find Jane Doe. Said private investigator located her and recorded a conversation with her but, at the time, Jane Doe said she was currently not interested in speaking out as her parents did not know she was a stripper.

These are felonious criminal acts, including illegally obtaining an 'abortion pill'; illegally administering said medication; administering medication to an individual unbeknownst to said individual; and causing the death of an unborn child via a forcibly induced abortion.

For purposes of this matter and this motion, Mr. Miller indisputably should be subjected to a psychological evaluation, as his ability to execute violent acts of physical harm place the child's safety in question. At the very least, this goes to his moral fitness not only as a parent but goes to the core of whether this Court can trust Mr. Miller's statements.

[This is all even in line with Mr. Miller's past going back over 20 years. For instance, a 1996 *Washington Post* story on the 'raging' fraternity party scene in George Washington University in Washington, D.C., specifically featured Mr. Miller, at the time a senior at the university, as a hard partying 'frat boy.' (See *Washington Post*, September 20, 1996, "Party Hardly" by Roxanne Roberts.<sup>1</sup>) The article notes Mr. Miller seems to be the partying ringleader of a **banned** fraternity, Sigma Alpha Epsilon, which was banned for "thuggish behavior." The university's dean is quoted in the article as stating: "We have no ability to control this group [Miller's fraternity]. We've done everything we can to warn our students." At 2 am on a weekday, a fraternity brother of Mr. Miller's is quoted as hoping for girls and illegal drug whilst Mr. Miller approvingly surveys the same room "like a proud father." (In contrast, Mother spent her own senior year holed up in the 6<sup>th</sup>

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<sup>1</sup> [https://www.washingtonpost.com/archive/lifestyle/1996/09/20/party-hardly/277525ad-c03b-40b9-a617-691bcd332d61/?utm\\_term=.72c37cb7919e](https://www.washingtonpost.com/archive/lifestyle/1996/09/20/party-hardly/277525ad-c03b-40b9-a617-691bcd332d61/?utm_term=.72c37cb7919e)

floor of the University of Florida, working on a senior thesis, which received highest honors, refuting Holocaust deniers and wrapping up a 4.0 GPA.)]

**Mr. Miller will attempt to claim these are mere allegations the Mother somehow decided to invent, a year into this litigation. Such is completely false. To nip such in the bud, the Mother, herein, lays out exactly how this information came to her, as well as its confirmation by an impartial, nationally-heralded journalist.**

MOTHER FIRST LEARNS OF MR. MILLER’S CRIMINAL AND VIOLENT PAST;  
HOW THIS INFORMATION FIRST CAME TO MOTHER

On May 27<sup>th</sup>, Mr. Miller posted on social media a rambling, 8-part attack on the Mother, to his 100,000 social media followers. Mr. Miller has previously done such.

Unfortunately for Mr. Miller, whose public attacks on the Mother always spectacularly backfire, the majority of responses to Mr. Miller, as usual, were in support of Mother and/or chastising Mr. Miller on various angles.

One of Mr. Miller’s tweets attacking the Mother cynically asked his social media followers to “pray” for him (even though Mr. Miller is in, reality, an agnostic. Only recently, as a public-relations and litigation-tactic for this litigation, has Mr. Miller began posting occasional ‘religious-themed’ tweets, as has his agnostic wife, even though a quick review of his years-long social media postings show absolutely zero religious postings prior to this litigation. In fact, Mr. Miller had once informed Mother that his daughters had rarely even ever stepped inside any church).

One curious tweet responding to Mr. Miller stated:

***Jason, I’m praying for you. Praying all the weird nasty shit you’ve done and all the unethical immoral deals you make come to light. You deserve nothing but suffering***

(See image attached as Exhibit 1.)

Another curious tweet by the same user, to both Miller and his wife (Mrs. Miller often uses her own social media account to attack the Mother and antagonize the situation), stated:

***Kelly, your husband has serious issues. Ask him about Rachel’s in Orlando back in the day and his friend ‘[\_\_\_\_\_]’***

(See image attached as Exhibit 2. The tweet listed a woman’s first name but the name is omitted from this filing]

These oddly specific (e.g., referencing “immoral deals”) and intriguing tweets were brought to the Mother’s attention by a friend who saw them. The way the tweet addressed Mr. Miller as “Jason” also seemed to indicate familiarity – i.e., someone who had met or

actually knew Mr. Miller in a personal capacity and not just a stranger on Twitter spouting nonsense. A quick review of the individual's feed showed a normal, respectful Twitter user, who did not even seem to use Twitter much and who mainly tweeted about sports and, on occasion, in a subdued manner, political matters (i.e., this person was not a social media 'troll' looking to pick on Miller – in fact, the account had never previously even tweeted at or about Miller). The individual's tweets also indicated an educated individual with political industry knowledge who appeared to be financially comfortable.

Mother debated whether to reach out to the Twitter user for more information, afraid of what she might learn. She decided she needed to do so, for her son's safety's sake. Mother reached out to said individual (herein, "Gentleman A") by sending him a message on Twitter, since the ability to message him was open. *See* messages exchanged on May 28<sup>th</sup> between Mother and Gentleman A, attached as Exhibit 3.

*Hi, can you please email me? My son and I need your help and it sounds like you know somethings [sic] [Mother's email address]. Or send me an email saying so and I can send you my cell to call if you['d prefer to talk, or whatever. Thank you*

Gentleman A responds:

*I wish I could help you more but any of my information would be hearsay. I know Jason through mutual friends and their staffers. [Names three Florida politician – names are omitted from this filing] and a few others. I['m a [occupation] for a [company description] company so entertained him and these guys when he was at Jamestown but I'd bow out when they went for the strip clubs or escorts, not my idea of a good time but the staffers would tell me everything. I can offer a breadcrumb that I'm confident in.. the name [included her full name but name is omitted from this filing]. She's in South Florida. I split time between [\_\_\_] and [\_\_\_]. I'm up in [\_\_\_] but in Miami often and i think we know a few of the same people. [names two individuals in Florida politics]. Best of luck to you.*

He also messaged Mother:

*btw my tweet to his wife about [Jane Doe's name here], got reported, so i had to delete it , then this just happened....*

He includes a photo of Mr. Miller having blocked him.

He adds: "*and this*" and includes a photo of a bizarre cease-and-desist boilerplate format letter sent to him. "*Sooooooooo....*"

(See attached as Exhibit 4.)

Mr. Miller had apparently gone through the trouble of *reporting* the tweet to Twitter and Gentleman A was forced to by Twitter to *delete* the tweet. This, in and of itself, was telling, as Mr. Miller is widely disliked – on both the Right and the Left -- and receives heaps of hateful tweets daily. Why then had he singled *this* tweet for reporting to Twitter and gone through the trouble of reporting it?

Additionally, the boilerplate “cease and desist” letter sent via a Direct Message to Gentleman A was from a Twitter account -- @ScottMarshall1 -- that appeared to have been created that very day, likely solely for the purpose of scaring and intimidating Gentleman A. The account was, subsequently, mysteriously deleted.

Gentleman A and Mother then spoke on the phone on May 29th. Gentleman A explained he sympathized with Mother, as a fellow parent, having witnessed in the news and on Twitter some of what Mr. Miller was putting her through, and knowing Mr. Miller “is not a good guy.” While reluctant, he seemed to be a genuinely kind person and one who was sincerely concerned about what he had heard of Miller’s mistreatment of women.

Mother, concerned for her son’s safety, who has unsupervised time with the Mr. Miller, asked Gentleman A to tell her what he knew about Mr. Miller’s past.

**[Worth noting:** It is not Mother’s preference to try to find out information about Mr. Miller’s past. In fact, unlike Mr. Miller, her personal ethics go against attempting to find information on her fellow co-parent. This is in stark contrast to Mr. Miller, **who:**

**(a) has spent thousands of dollars on private investigators to look into Mother – as noted in his attorney’s bills, he has spent nearly five-figures on private investigators**, hoping to attack and discredit Mother, to no avail (**Mother spends every day and night caring for and with the child, and her outings exclusively consist of: Publix, the park, and Sunday mass, or the occasional errand to the UPS store or such.**). Mr. Miller has even had Mother followed while driving with her own son, endangering the child, only to wind up observing the Mother attending church and driving to her uncle and aunt’s house afterward for a visit. Even when the Mother was two months pregnant, Mr. Miller was spending his time contacting her law school classmates asking if Mother “really did attend and graduate from Harvard Law School” (which she did attend all three years and from which she graduated in 2002). Father has a resentment of lawyers, having wanted to become one but failing to do so, as noted in this article.<sup>2</sup>

**(b)** Over half a decade ago, the Mother became pregnant (the only other pregnancy she has ever had) and lost the child. In her subsequent grief and post-traumatic stress, she subsequently sent the individual dozens of emails, albeit spread over the course of 4 months, but none of which were threatening or violent. The individual then suddenly blindsided Mother and asked a court for a

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<sup>2</sup> [https://www.washingtonpost.com/news/arts-and-entertainment/wp/2016/07/21/in-1996-jason-miller-wasnt-a-trump-bigwig-just-a-frat-bro-who-knew-how-to-party/?utm\\_term=.e8ed28dfe76f](https://www.washingtonpost.com/news/arts-and-entertainment/wp/2016/07/21/in-1996-jason-miller-wasnt-a-trump-bigwig-just-a-frat-bro-who-knew-how-to-party/?utm_term=.e8ed28dfe76f)

no-contact order, not wishing to hear further about Mother's grief. While Mother shared this painful chapter of her life with Mr. Miller in confidence during their relationship, Mr. Miller and his counsel, **Ana Martin Lavielle**, have chosen to turn the pain of a miscarriage into a litigation tactic, constantly referencing it and referencing it as a "domestic violence" order – even though no violence was involved or even alleged – and bringing it up in Court and in documents, hoping to poison the Court and the sitting judge against Mother. Worse yet, in May 2018, Mr. Miller sent a sneering message about such to Mother on Our Family Wizard and, within a day, the *NY Post* called Mother, saying it had received information from a source about this and would be writing the story. When the Mother told the reporter that it was clearly the Father who was his 'source,' the reporter merely chuckled and said "Well, you know I can't reveal that." That evening, the story was up. Mother has already missed out on various job opportunities because of this and is now forced to relieve a lost child daily, whenever she is asked about it, thanks to Mr. Miller. Additionally, Mr. Miller, his publicist, and his wife have now taken to casting Mother as Glenn Close's character in "Fatal Attraction", with Mr. Miller's wife (whose obsession with, and jealousy of, Mother has not improved with time), even posting on social media photos of a bunny in a stove and Mr. Miller doing the same, as recently as this month. *See Exhibit 5.*]

On the phone call, Gentleman A informed Mother that he worked/works in a similar line of work/industry as Mr. Miller, with much of Gentleman A's work focused on Florida politics (as did Mr. Miller's back in 2012). Gentleman A explained to Mother that, circa 2012, Mr. Miller was spending a lot of time in Orlando, FL, doing work on behalf of clients who had hired Jamestown Associates, Mr. Miller's employer. (This added up, as Mother recalled Mr. Miller telling her that he did a lot of work in Orlando some years back and loved it there.) Gentleman A interacted with Mr. Miller as part of his work, since they both worked in the same Florida industry circles. It was common for Mr. Miller and a group of industry colleagues to do steakhouse dinners followed by visits to gentlemen's clubs (though Gentleman A added Gentleman A would skip out on the latter part but recalled the group often "kept going" to strip clubs). "It's just how it is in Florida politics", he added. This, too, made sense to Mother, as Mr. Miller is so fond of strip clubs that he even dragged Mother (at the time, Mother was a top, senior advisor on the Trump campaign); another female colleague from the campaign; and various reporters to a strip club during an election trip in Las Vegas in October 2016).

Gentleman A then informed Mother what he had heard about Mr. Miller. As he had written on Twitter, wherein he explained he had heard the same account from **separate**, "**multiple**" sources -- all of which were "**credible**" sources -- Gentleman A noted this account, while cautioning it was unverified by him and while he was unable to vouch for its veracity, had circulated in Florida circles for years. It is as follows:

- During one of these business evenings out, Mr. Miller and others visited Rachel's, which Gentleman A informed Mother is a strip club in Orlando. (Mother had not heard of Rachel's but googled it and, yes, indeed there is a famous strip club in Orlando named Rachel's Gentleman's Club.)

- Mr. Miller met an exotic dancer or ‘stripper’ there, which herein will be referred to as “Jane Doe.” (**Gentleman A provided Mother the actual full name**, and Mother was able to easily locate her on Facebook later that day.)
- Mr. Miller and Jane Doe engaged in sexual intercourse and began a sexual relationship.
- Mr. Miller and Jane Doe continued a sexual (and possibly dating) relationship for some unknown, but not insignificant, period of time.
- **Soon thereafter, Jane Doe became pregnant.**
- **Mr. Miller told her everything would be fine and subsequently visited her at her apartment, taking her a Smoothie beverage for her consumption.**
- **The Smoothie, unbeknownst to Jane Doe, contained an abortion pill.**
- **Jane Doe ended up being hospitalized in a local ER, nearly dying.**
- **The unborn baby died.**
- Apparently, possibly due to drugs in Jane Doe’s system, the abortion pill had an extremely toxic effect and, in addition to killing the innocent child, nearly killed her.
- **Mother then asked Gentleman A how on earth this all ‘got out’/leaked.** He explained the reason it did is because, upon leaving the hospital, Jane Roe, enraged and rightly so, began contacting multiple individuals (political industry individuals) whom she knew to be colleagues of Mr. Miller (individuals who were with Mr. Miller the night she met him at Rachel’s, presumably) (Gentleman A believes she obtained any names she was missing / didn’t know from other dancers at Rachel’s, who may have known the other patrons by name). The individuals whose offices or colleagues were contacted are various well-known Florida politicians, whose names Mother is currently omitting from these filings.
- Mr. Miller, panicked, then tried to pay Jane Doe off and get her to sign a non-disclosure agreement in exchange for a payoff. Gentleman A did not know if she did sign anything or not. Nonetheless, intimidated and overwhelmed, Jane Doe appears to have gone away on her own.
- The story circulated in Florida circles for years but no one seemed to think much of it as Mr. Miller was a “nobody” at the time. “Fast forward to 2016, however, when he is suddenly on TV as the communications director for the Trump Campaign,” Gentleman A explained, and Mr. Miller was being talked about for a senior role in the White House, and the story resurfaced.
- Gentleman A added that when he first heard about Mother’s pregnancy, he worried for a moment if Mother’s life was safe, given what he had heard about Mr. Miller, but then was relieved to hear Mother was many miles away from Mr. Miller.
- Gentleman A said that, in late 2016 or thereabouts, some “very powerful people” had Florida’s best private investigator locate Jane Doe, who was still living in Florida. Jane Doe told the investigator that she was not interested in speaking out because her parents did not know she was a stripper and she did not want that to get out. However, subsequent to speaking to Gentleman A, recently Mother obtained knowledge of notes and an audio recording Jane Doe consented to.

Mother was shaken to her core, and pieces began to come together. For instance, at the Bay of Pigs Museum Trump Campaign event that Mother planned in October 2016, upon exiting the event, an individual slipped her an envelope with a note inside with similar claims, albeit shorter and more generalized. The note referenced “Mr. Miller in your campaign.” Mother immediately assumed the Miller referred to “Stephen Miller”, as he was the Miller who was in attendance and the most well-known “Miller”, as Mr. Miller (Jason Miller) had only joined the campaign in the tail end (July 2016). She chalked up the note to vicious rumors by the opposition and promptly disposed of it, thinking nothing of it.

Hearing this now in the summer of 2018, Mother was flabbergasted and shaken. She knew Mr. Miller was a morally devoid individual but this was on a whole other level that she did not expect. **If true, it now meant Mr. Miller had impregnated not one but two women while married to his wife. Most importantly, however, it meant Mr. Miller had (a) illegally obtained an abortion pill; (b) illegally administered said abortion pill against the victim’s wishes/unknown to the victim; (c) killed an unborn child in the womb; and (d) nearly killed a woman who trusted him. If true, Mr. Miller should be in prison.**

#### RENOWNED JOURNALIST CONFIRMS STORY; DESCRIBES MR. MILLER AS A “PSYCHOPATH”

That evening, May 29<sup>th</sup>, Mother shared what she was told with renowned investigative journalist (herein “Journalist A”), who had been corresponding with Mother recently about a potential profile piece he wished to do on Mother. Journalist A is one of the nation’s most respected and pre-eminent journalists, who has broken many national stories. His work is closely followed and supported by millions, including countless A-list celebrities. Journalist A was concerned and decided to look into the story, particularly given that the matter concerned abuse of women and the safety of a child.

He did so, in a painstakingly methodical and responsible process. After locating and speaking to the victim, as well as friends and family of the victim, including traveling to Florida, **Journalist A confirmed the account directly with the victim herself.**

Jane Doe’s instant reaction was: “Yes, that happened to me – how did you know? Who told you?”

The timeline was (Mother is leaving a great deal out of this document, to preserve Journalist A’s journalistic process) generally as follows:

Via Facebook, Journalist A was able to get in touch with Jane Doe and she agreed to speak to him, setting up a time to talk on May 31<sup>st</sup> and subsequently on June 1<sup>st</sup>.

Leaving no journalistic stone unturned to fully and responsibly confirm the story, **Journalist A even flew to Florida to personally investigate the story.**



On June 11<sup>th</sup>, Journalist A informed Mother he had what he needed and had “been writing [the article] up the past two days.” On June 13<sup>th</sup>, Journalist A informed Mother he would be flying to Orlando the next morning at 8 am and would do “Orlando first” and then stop by Miami.

On June 14<sup>th</sup>, Mother sent him a text asking “Are you in Miami?” to which Journalist A replied:

*No, in Orlando and learning a lot about your friend meaning JM [Jason Miller]*

*He’s a psycho[path]*

*Not that you didn’t already know that*

(See image of text as Exhibit 6.)

On June 23<sup>rd</sup>, Mother spoke with Journalist A shortly after he returned to his home state post-Florida trip. Journalist A confirmed what Mr. Miller did to Jane Doe, without, of course, delving into much detail in order to preserve journalistic process (but giving Mother enough detail that a mother-concerned-about-safety would deserve in such circumstances), and adding he had “all I need from her to write the story”. Most of all, Mother was concerned for her son’s safety and her own. Journalist A added there was, much to Mother’s surprise, an additional, separate victim he learned of in the course of investigating this, as noted below.

#### AN ADDITIONAL VICTIM OF MR. MILLER IS ALSO CONFIRMED

On June 22<sup>nd</sup>, Journalist A was back in Florida and informed Mother (in response to whether he would be visiting Miami) that he was in Clearwater, FL, researching the story: “Hey I’m in Clearwater. I’ll be done around 6 pm.” Soon thereafter, Mother was shocked to learn from Journalist A that the reason he had traveled to Clearwater was because he had been referred to **yet another victim of Mr. Miller’s**, in addition to Jane Doe— this time, a woman Mr. Miller was involved with, seemingly around the same time period as Jane Doe, **with whom he was physically abusive**. The woman, who lives in Clearwater, FL and does not work in politics, and with whom Journalist A met in person, informed Journalist A that **Mr. Miller physically beat her (“with an open hand”)**.

While shocking, this all made sense to Mother and revealed a pattern: As noted in motions filed with this Court by Mother (before Mother even knew of this), Mr. Miller was physically abusive towards Mother herself (specifically: a morning in late November 2016, when Mother refused to agree to terminate the pregnancy, and Mother was thus forced to flee – sprinting out into the hallway and hurriedly rushing into an elevator – out of Mr. Miller’s apartment in Beekman Tower on the east side of Manhattan).

To hear that another woman was *also* hit by Mr. Miller alarmed Mother – if Mr. Miller has been physically abusive to *at least* two women, **is he capable of hitting the child?** At the very least, Mother feels this denotes severe anger management and violent tendencies, which a psychological evaluation could potentially ascertain.

As a courtesy to Mother's safety, as Mother feared Mr. Miller's reaction when the story emerged and the truth about his background revealed, Journalist A informed Mother when she could expect the article to go live, likely on or around July 6th. On June 28<sup>th</sup>, he stated it would likely be up in "lock and copy" on Wednesday and then would be published likely July 6th. However, Journalist A continued working on it, and continues to this day working on it, in part as his editors now suddenly required additional information prior to publishing because they were concerned, perhaps understandably, that Jane Doe would backtrack and disappear post publication (**indeed, it appears Mr. Miller has paid her off once again, once he learned in July that Mother knew of this – See below**) but also based on additional angles to explore that have come to Journalist A's attention in regards to Mr. Miller. For purposes of this motion, all that is relevant is **Journalist A continues working on the report.**

#### A FRIEND OF JANE DOE ALSO CONFIRMS THE BABY'S TERMINATION

Subsequent to Mother addressing the matter with Mr. Miller on Our Family Wizard in mid-July, Jane Doe began to pull away from Journalist A. It is possible – if not likely-- that Mr. Miller paid her off or had thugs intimidate her. She was no longer returning Journalist A's calls and seemed reluctant to speak to him.

However, on July 24<sup>th</sup>, a friend of Jane Doe's, Sean, also generally confirmed the matter, as well: On July 24, Journalist A sent the following text message to Mother:

"So get this. I called her friend, Sean. And talked to him for a few mins without getting in any details. Said could you please have her call me back. Then I texted him a thank you. And guess how he responded"

Journalist A then sent a photo of a text Sean sent him. It simply read:

#### *Is this about the abortion?*

(See attached images as Exhibit 7.)

#### MOTHER ATTEMPTED TO ADDRESS THIS ISSUE PRIVATELY WITH MR. MILLER, TO NO AVAIL, LEAVING HER NO CHOICE BUT TO FILE THIS MOTION. MOTHER TRIED MULTIPLE TIMES, ACROSS WEEKS (July 12<sup>th</sup> – August 4<sup>th</sup>).

On July 12<sup>th</sup>, the Mother asked Mr. Miller directly about the matter, sending a message on Our Family Wizard (the app the two use to communicate). See Exhibit OFW-1. The system shows Mr. Miller opened and read the message promptly. However, he did not reply, at all.

As this Court must reasonably infer, any innocent person would have replied with words to the effect of "What on earth are you talking about?? This is completely untrue!" but Mr. Miller did not, likely because, due to the level of detail he saw that Mother already knew, denial would be pointless and he could even be in worse trouble for denying it, should the message be shown to Jane Doe and infuriate her.

July 14<sup>th</sup>: Two days later, Mother tried again, reminding Mr. Miller that he is Court-ordered to respond and that she will take his silence as consent to the truth of the matter. He read the message within an hour but again curiously refused to address the matter, much less deny it. *See Exhibit OFW-2*

July 18<sup>th</sup>: Four days later, Mr. Miller created a new message string, related to August timesharing, flippantly acting as if the two pending messages about Jane Doe did not exist. Mother replied that she would only answer once he had first addressed the still-outstanding messages about the Jane Doe matter, as Court ordered. He read her message at 10:46 am, within a few minutes of Mother sending it, but refused to reply, yet again. **This would be the *third* message about Jane Doe to which Mr. Miller refused to reply. In fact, he then completely disappeared off of Our Family Wizard for weeks** and he did not send any messages about anything, even about the time-sensitive August timesharing, preferring, it seems, to not even discuss the August timesharing, lest he have to answer regarding this matter. *See Exhibit OFW-3.*

July 21<sup>st</sup>: Mother sent Mr. Miller a message in the morning with the subject line “Failure to reply re: [Jane Doe]”. He read it within an hour but again refused to respond. *See Exhibit OFW-4.*

August 4<sup>th</sup>: Mother waited two weeks to again bring up the matter, which she did on August 4<sup>th</sup>. *See Exhibit OFW-5.* He read her message within an hour but did not respond. **This was the fifth message in a row about Jane Doe that he inexplicably refused to address.** Mother then replied, around 8 am, to another message string and brought it up there. *See Exhibit OFW-6.*

Around 4 pm that evening, Mother, finally, **nearly one month after it was first brought up and over half a dozen messages later**, received a reply from Mr. Miller. But it was a disturbingly vague non-denial denial, in which he very generally stated:

**“I have no knowledge of the events you describe”.**

*See Exhibit OFW-7.*

The wording seems to be advised by a lawyer, e.g., not exactly denying the story and leaving wiggle room. It does not say the matter is not true. Moreover, Mr. Miller even hurriedly added that he will not discuss the matter further.

MOTHER IS ALSO CONCERNED THAT MR. MILLER’S WIFE MAY BE AWARE OF THIS AND APPROVED OF SUCH

Mother is also concerned that Mr. Miller’s wife is aware of all this and what that reveals about her own unstable obsession with maintaining the image of a happy marriage at all costs, and how that can affect her actual posture towards, and treatment of, this child, who is the product of her husband’s infidelity.

When Mr. Miller was discussing with Mother his alleged plans to divorce his wife, in December 2016, Mr. Miller expressed to Mother in a text message that he was panicking his wife would “make noise” if he divorced her. *See* Exhibit 8, a text message sent from Mr. Miller to Mother circa December 18<sup>th</sup>, less than 24 hours after Mrs. Miller learned of the relationship and pregnancy. At the time, Mother did not know to what “noise” Mr. Miller was referring, but assumed perhaps it was to professional misconduct or improper financial dealings. Given the new information, Mother now believes it is that Mr. Miller’s wife knew of what occurred in 2012.

Such would also explain his wife’s utter lack of surprise to Mr. Miller impregnating Mother in 2016, *as if his wife had been through this before*. Mrs. Miller’s email to Mother, sent less than 24 hours after learning her husband had impregnated another woman, was disturbingly nonchalant and even boasted she and her husband would be “stronger” as a result of his impregnating Mother. *See* Exhibit 9. This is not the reaction, by *any* standard, of a woman who was finding out for the *first* time that her husband is unfaithful, or that her husband would/could impregnate someone else.

In fact, Mother responsibly sent Mr. Miller’s wife an email about this on July 14, 2018 (the only email Mother has sent Mr. Miller’s wife since December 2016 – and the only two sent in December 2016 were one asking Mrs. Miller to call her and another asking her to please calm down for the sake of the unborn child). *See* Exhibit 10. Regarding the July 14, 2018 email, Mr. Miller’s wife did not seem to care, as if she was *already* aware of this.

This Court is unable to submit Mr. Miller’s wife to a psychological evaluation (even though it realizes the need for such, as indicated by Judge David Young at the June 7, 2018 Court hearing where he seemed to agree with Mother’s counsel that such would be a good idea but lamented that he “does not have jurisdiction over Mrs. Miller”, offering instead, as a Plan B alternative, to send a social services investigator to the Millers’ home in Arlington, VA). However, this Court *does* have the power to order (a) supervised visitation, or (b) limit the timesharing to Mr. Miller only, or (c) limit the overnights or other significant timesharing, during which Mrs. Miller is likely to be unsupervised around the child, until the child is old enough to speak for himself.

#### CONCLUSION

Mother submits all this information to the Court only as a last resort, as previously stated above, due to Mr. Miller having refused to address the matter privately, as Mother would have preferred to do. She respectfully asks this honorable Court to order a psychological evaluation of the Father, for the well being of the child, both for the reasons listed herein and those listed in her March motion. Grounds exist under Florida statute 12.360 and the standard is met.

**EXHIBITS**

EXHIBIT 1

Replying to @JasonMillerinDC

Jason I'm praying for you

Praying all the weird nasty shit you've done and all the unethical immoral deals you make come to light. You deserve nothing but suffering



EXHIBIT 2

1

Replying to @KellyCo43715169 and  
@JasonMillerinDC

Kelly, your husband has serious issues.  
Ask him about Rachel's in Orlando back  
in the day and his friend " [REDACTED] " 🤔



EXHIBIT 3



Hi, can you please email me? My son and I read your field and it sounds like you know something...  
[REDACTED] @ [REDACTED]. Or send me an email saying so and I can send you my cell to call if you prefer to talk, or whatever.  
Thank you



May 28 ✓

I wish I could help you more but any of my information would be hearsay. I know Jason through mutual friends and their staffers. [REDACTED], [REDACTED], [REDACTED] and a few others. Im a [REDACTED] lobbyist for [REDACTED] [REDACTED] company so entertained him and these guys when he was at Jamestown but I'd bow out when they went for the strip clubs or escorts, not my idea of a good time but the staffers would tell me everything. I can offer a breadcrumb that I'm confident in.. the name [REDACTED] [REDACTED]. She's in South Florida.

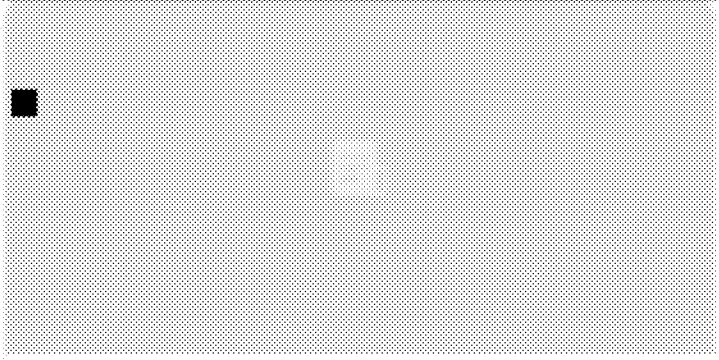
I split time between [REDACTED] and [REDACTED]. I'm up in [REDACTED] [REDACTED] but in Miami often and i think we know [REDACTED] of the same people. [REDACTED], [REDACTED].

Best of luck to you.

May 28

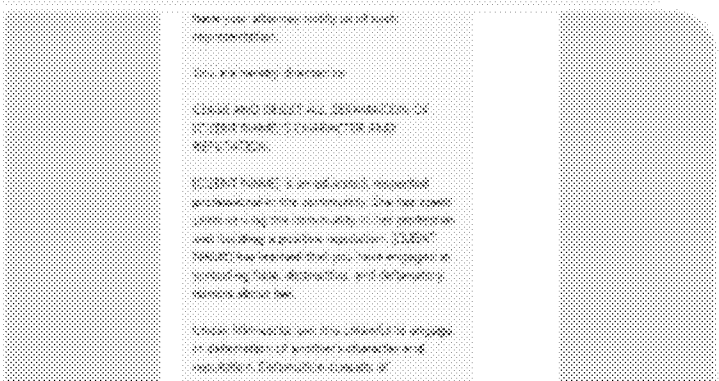


EXHIBIT 4



Imgur  
imgur.com

btw my tweet to his wife about [REDACTED], got reported, so i had to delete it , then this just happened....



Imgur  
imgur.com

and then this....


5/29/18, 11:43 AM

soooooooooooo....

5/29/18, 11:46 AM

EXHIBIT 5

↳ Jason Miller Retweeted

 **Kelly Courtney Miller** @kellymiller0918 · 22h  
if you only knew!!!! #littlesony



🔄 3 🍷 7

EXHIBIT 6

No in Orlando and learning a lot about your friend meaning JM

He's a psycho

Not that you didn't know that

Oh no doubt.

EXHIBIT 7

So get this

I called her friend Sean

And talked to him for a few mins  
without getting in any details

Said could  
You please have her call me back

Then I texted him a thank you

And guess how he responded

Done

1 of 13

Yesterday 6:10 PM

Is this about the abortion?



## EXHIBIT OFW-1

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To: Jason Miller (First View: 07/12/2018 1:58 PM)

Sent: 07/12/2018 1:58 PM

Subject: [REDACTED]

---

**Message:**

Jason:

An overnight with Will, who cannot speak and cannot defend himself, is alarming. You have forced me to bring this up.

There are severe concerns about his safety, and mine, regarding information that was shared with me by various journalists/political figures and has been confirmed.

In 2012, when you were working for Jameson in Orlando, you attended a strip club with several other colleagues and staffers of in-office politicians, after a work dinner. The strip club was named Rachel's. There, you met a stripper (whose full name I have but am withholding to avoid harassment of her by any third party reading this now or in the future), [REDACTED]. You had intimate relations and continued seeing her, despite your being married and with a child at the time.

Soon thereafter, she became pregnant and informed you. You pretended to continue seeing her as if nothing was wrong and, shortly thereafter, she was hospitalized and nearly died, after you criminally administered an abortion pill to her without her knowledge, slipping it into a Smoothie beverage that you bought and took to her apartment. Subsequent to her hospital stay, during which she miraculously lived despite her body reacting negatively to the illegal pill, yet lamentably lost the child, she immediately thereafter contacted various staffers who were with you that night you two met. You tried to get her to sign an NDA.

It turns out, the White House was made aware of this in 2016 and that your relationship with me was merely the last straw. You falsely claimed our relationship was what made you lose the White House job in December 2016. No, it was your past straight out of a 1990's crime-thriller film.

There is, I am told, another mistress from that time (name also withheld), whom you physically BEAT with an open hand.

You should be in prison, as you killed your own child but also almost killed an innocent young woman by subjecting her to an abortion against her will; you illegally administered severe medication; and your illegally obtained said medication.

This information will be vetted at trial. You are in no position to have an overnight with a baby and, as soon as I am able, will be filing for supervised visitation.

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## EXHIBIT OFW-2

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**From:** Ariene Delgado  
**To:** Jason Miller (First View: 07/14/2018 11:43 AM)  
**Sent:** 07/14/2018 10:20 AM  
**Subject:** still waiting for an answer on this

---

**Message:**

You are Court-stigated to respond to all messages and this relates to timesharing and Will's safety during timesharing.

I will assume your silence is due to its truth (after all, two journalists already reached out to ██████████ and this was already independently confirmed).

From:  
Ariene Delgado  
To:  
Jason Miller (First View: 07/12/2018 1:58 PM)  
Sent:  
07/12/2018 1:58 PM  
Subject:



## EXHIBIT OFW-3

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**From:** Arlene Delgado  
**To:** Jason Miller (First View) (07/18/2018 10:48 AM)  
**Sent:** 07/18/2018 10:38 AM  
**Subject:** RE: August timesharing requests

---

**Message:**

I will not be responding to any messages until you respond to the messages I sent regarding [REDACTED] [REDACTED] as that concerns timesharing (namely, William's safety around you and also William's safety around your spouse, who possibly played a role in harming this woman and her child).

You are required per Court Order to respond to all messages within 12 hours.

---

**On Wed, 07/18/18 at 10:19 AM, Jason Miller wrote:**  
**To:** Arlene Delgado  
**Subject:** August timesharing requests

## EXHIBIT OFW-4

**From:** Ariane Delgado

**To:** Jason Miller (First View: 07/21/2018 11:31 AM)

**Sent:** 07/21/2018 10:27 AM

**Subject:** failure to respond re [REDACTED] [REDACTED]

**Message:**

Your silence regarding repeated messages regarding your actions towards [REDACTED] [REDACTED] are taken as your acceptance of such, and that you do not deny this.

Ms. [REDACTED] will be subpoenaed as a trial witness and for a deposition, as will another woman (another woman with whom you had an adulterous affair) who has stated that you physically beat her.

A Contempt motion will be filed, as you were/are obligated to address this, since it is specifically relevant to Will's safety around any timesharing with you and your moral fitness (or lack thereof) to parent effectively. I will be seeking a halt on any timesharing until this matter is fully vetted, to safeguard Will.

## EXHIBIT OFW-5

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**From:** Ariana Daigoff

**To:** Jason Miller (First View: 08/04/2018 7:30 AM)

**Sent:** 08/04/2018 6:38 AM

**Subject:** [REDACTED]

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**Message:**

Let me ask you this, "Should our son, who can't speak for himself, be unsupervised around an individual, parent or not, who killed a mother's unborn baby without the woman's permission, and almost killed her as a result? I have REPEATEDLY attempted to address Will's time-sharing safety in private, and have politely asked you to address this harrowing matter of great concern. You don't deny it, why not? If it is untrue, you'd simply say "It's a lie". Various individuals, including two journalists, have checked out the story and Julia has already confirmed every detail so the only option is that a woman is suddenly, for no reason, making this up, and has been making up this story since 2012, which I don't believe is the case. Oddly enough, someone at the Bay of Pigs event in Miami during the campaign had informed me of this, and I assumed they were talking about Stephen.

So how do you suggest we proceed with time-sharing, given this huge elephant in the room? Once again, I am giving you yet another opportunity to address this privately rather than through Court filings or my having to subpoena (fortunately for Will, she lives in Florida and can be subpoenaed to even appear at trial, which she will do voluntarily.) I have many questions and I am gravely concerned for Will. For instance, was your wife involved obtaining the pill you gave this woman, to get rid of your love child? Was she aware of what occurred? How do I know she won't harm Will at some point?

Please address this because I really do need to know Will is safe around you and around your wife. I have never felt he is safe around your wife but at least assumed he was safe around you. You must address this. Otherwise, it is clear you are doing this (failing to address it and discuss it/reattack me) deliberately, in order to sabotage time-sharing (clearly you simply don't even want to see Will and this is a way to get around that and try to disguise it to me preventing it, it's transparent, though.)

I will gladly show the Court my many attempts to address this privately with you, only to be met with flippancy, arrogance, and dismissiveness. This concerns WILL'S SAFETY.

EXHIBIT OFW-6

**From:** Arlene Delgado  
**To:** Jason Miller (First View: 08/04/2018 12:57 PM)  
**Sent:** 08/04/2018 7:57 AM  
**Subject:** August timesharing proposal response

**Message:**

In response to your request for August timesharing, [REDACTED]

## EXHIBIT OFW-7

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**From:** Jason Miller  
**To:** Ariene Delgado (First View: 08/05/2018 4:26 AM)  
**Sent:** 08/04/2018 4:10 PM  
**Subject:** RE: August timesharing proposal response

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**Message:**

[I have no knowledge of the events you describe] and will not be discussing this any further. William is in great care when he is with me.

Thank you for confirming the upcoming weekday timesharing:

Monday, August 6th, 1pm-5pm.

## EXHIBIT 8

I'm sure she's done emailing now, and she won't do anything publicly. She's not out of control. But if she gets it up publicly you can guarantee she'll make noise. And if I get it up publicly, everybody can just forget about hearing from me ever again. You think I'll get a job again ever? Forget the WH - that's done. I'm talking for anything. I'll be the bad guy here and nobody will touch me.

01/20/2007

0000

EXHIBIT 9



\* [REDACTED]@aol.com  
to [REDACTED], top, follow >

Sun, Dec 18, 2016, 8:06 AM [star] [flag] [refresh]

Just so we are clear...I have talked to my husband. I know about your supposed pregnancy. We have decided we are going to work on our marriage and raise our family. This actually might make us stronger.

Thing is...never works out for the person in your position. Clearly we have responsibilities here and we accept those.

Don't ever call me or email me again. I am not going to play this game with you.

Sent from AOL Mobile Mail

-----Original Message-----

From: [REDACTED] <[REDACTED]@aol.com>  
To: [REDACTED] <[REDACTED]@aol.com>  
Cc: JMiller <JMiller@JamesonAssociates.com>  
Sent: Sun, Dec 18, 2016 12:08 AM  
Subject: Re: chat

You are a fucking skid. Don't ever reach out to me again.

Sent from AOL Mobile Mail

-----Original Message-----

From: A.J. Delgado [REDACTED] <[REDACTED]@aol.com>  
To: [REDACTED] <[REDACTED]@aol.com>  
Cc: JMiller <JMiller@JamesonAssociates.com>  
Sent: Sat, Dec 17, 2016 03:39 PM  
Subject: chat

Please call me when you have a moment tonight. SOS [REDACTED]. Will also try your cell.

T

EXHIBIT 10

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OFW



A.J. Delgado [REDACTED] [REDACTED] [REDACTED]

Sat, Jul 14, 10:22 AM



to [REDACTED]

Your husband must answer the OFW messages I have sent him regarding [REDACTED] and Orlando in 2012, as well as whether you were involved in the same. It concerns my son's safety around either of you.



**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 14th day of September, 2018, a true and correct copy of the foregoing was filed using the Florida Courts E-filing Portal, which will in turn send notice of electronic filing to: Ana Martin-Lavielle, Esq., Perez-Abreu & Martine-Lavielle, P.A., *Counsel for Petitioner/Father*, 901 Ponce de Leon Blvd, Suite 502, Coral Gables, Florida 33134; ana@pamllaw.com.

By: s/Arlene Delgado  
Arlene Delgado  
Email: adelgado@post.harvard.edu  
Phone: (305) 510-3400