

December 5, 2025

**Re: Enclosed Request for Impeachment Proceedings Regarding Judge  
Stephanie J. Perlow**

**Dear Representative Steven Rudy:**

I am a constituent residing in House District 1, and I write to ask that you review the enclosed letter formally requesting that the General Assembly initiate impeachment proceedings regarding Judge Stephanie J. Perlow of the Marshall Family Court. As explained in the enclosed letter, the record in my case, including the Kentucky Court of Appeals opinion in No. 2024-CA-0384-MR, reflects a sustained pattern of jurisdictional violations, financial misconduct, and obstruction of appellate review, as well as the refusal of internal judicial bodies to address this conduct, which in my view warrants consideration under the impeachment authority granted to the General Assembly by Sections 66–68 of the Kentucky Constitution.

In addition to impeachment proceedings, I respectfully request that Judge Perlow be suspended from exercising judicial duties while these matters are investigated, in order to protect the families who must rely on Kentucky's family courts.

If you would find it helpful, I am prepared to provide any additional documentation you may need, including court orders, transcripts, filings involving the Administrative Office of the Courts, and copies of my complaint to the Judicial Conduct Commission.

Thank you for your time, your consideration of this matter, and your service to the Commonwealth of Kentucky.

Sincerely,

Ron Rock



**Formal Request for Impeachment Proceedings Against Judge Stephanie J. Perlow, Marshall Family Court**

December 5, 2025

**Dear Representative Steven Rudy:**

I am writing as a citizen of Kentucky to formally request impeachment proceedings against Judge Stephanie J. Perlow of the Marshall Family Court. The record of proceedings, including the Kentucky Court of Appeals opinion in No. 2024-CA-0384-MR, reflects a sustained pattern of gross misconduct, constitutional violations, abuse of judicial authority, and actions taken in the absence of jurisdiction.[file:981d7b49-6cfc-4095-8f5f-10dbaad7687c] These actions undermine the integrity of Kentucky's judiciary and, in my view, require legislative intervention under the impeachment authority granted to the General Assembly by Sections 66–68 of the Kentucky Constitution to protect public trust.

Before listing the specific grounds, please consider that these concerns do not arise from ordinary judicial discretion but from clear jurisdictional limits and mandatory statutory prerequisites in Kentucky law, including KRS 620.060, 620.080, 403.836, 403.212, and 403.213, as well as controlling Kentucky Supreme Court and Court of Appeals precedent on child support arrearages as vested judgments.

**GROUNDS FOR IMPEACHMENT**

**1. Ruling Without Jurisdiction and Denial of Due Process**

- Failed to initiate and conduct the mandatory emergency custody and temporary removal process required by KRS 620.060 and KRS 620.080, and nevertheless proceeded to enter custody and related orders as if a valid emergency order and timely temporary removal hearing had occurred. Allowed the opposing party, despite ongoing violations of court orders and bad-faith conduct, to invoke the court's jurisdiction and obtain equitable relief, contrary to the long-recognized "clean hands" doctrine applied by Kentucky courts, which denies equitable relief to litigants whose own misconduct is intertwined with the relief they seek.

**2. Custody jurisdiction and contempt / unclean hands**

- Under KRS 403.836 and the Uniform Child Custody Jurisdiction and Enforcement Act, Kentucky courts only have authority to make or modify custody determinations when statutory jurisdictional requirements are satisfied. Kentucky decisions also recognize that a parent who is in contempt and acting in bad faith may be barred from invoking the court's equitable jurisdiction to seek custody or modification until contempt is resolved, consistent with the "clean hands" doctrine.

### **3. Child support jurisdiction and prerequisites**

- KRS 403.213 requires a "material change in circumstances that is substantial and continuing" before child support can be modified, typically shown by at least a 15% change in the obligation. KRS 403.212 requires verified income information and a completed guideline worksheet (CS-71) as the basis for any support calculation. When the court modifies support without these statutory prerequisites, it acts outside its lawful authority.

### **4. Emergency custody and juvenile jurisdiction**

- KRS 620.060 and KRS 620.080 require that when the state exercises emergency custody authority, a temporary removal hearing must be held within seventy-two hours (excluding weekends and holidays), and the procedures in the juvenile code must be followed for the court to retain jurisdiction over the child. Failure to initiate and conduct the required emergency custody and temporary removal process is a jurisdictional defect, as recognized in cases such as R.M.K. v. A.L.B.

### **5. Arrearages as vested judgments**

- In Lichtenstein v. Barbanel, the Kentucky Supreme Court held that family courts have no authority to forgive child support arrearages because each unpaid installment is a judgment and a vested property right. Cases like Raymer v. Raymer and similar decisions from the Court of Appeals reiterate that arrears must be enforced rather than retroactively eliminated.

### **6. Fabrication of Child Support Records and Financial Misconduct**

- Unilaterally erased approximately \$18,000 in child support arrears owed to me without a filed motion, waiver, evidentiary basis, or lawful authority, contrary to Kentucky law, which holds each unpaid installment is a judgment that cannot be retroactively forgiven, as recognized in cases such as Raymer v. Raymer, Sallee v. Sallee, and Lichtenstein v. Barbanel.

- Imposed child support based on a one-time stock withdrawal while I was unemployed, disregarding statutory guidelines for determining ongoing income and refusing to recalculate despite documented changes in circumstances.
- Ignored or struck financial documentation I submitted while adopting the opposing party's unsupported testimony as findings of fact.

These actions directly conflict with KRS 403.213 and 403.212 and with Kentucky Supreme Court precedent such as Lichtenstein v. Barbanel and Raymer v. Raymer, which recognize child support arrears as vested judgments that cannot be forgiven.

## **7. Misconduct in Office and Fraud Upon the Court**

- Accepted demonstrably inaccurate testimony from the opposing party and counsel wholesale as findings of fact, without conducting an independent evaluation of the evidence.
- Disregarded, excluded, or failed to address material financial and factual evidence in the record, thereby compromising the impartial adjudicatory function required of a family court judge.
- Entered orders that lacked sufficient findings of fact and legal analysis, creating a record that concealed the true basis for decisions and impaired meaningful review.
- The Court of Appeals opinion discusses her handling of my CR 60.02 motion, her imposition of sanctions for actions taken in compliance with court orders, and her removal or disregard of evidence I submitted, all of which further demonstrate this pattern. For example, during motion hour in open court, Judge Perlow told opposing counsel words to the effect of, "I have to let him do this in case he tries to appeal, so we can say we did everything," indicating that she was more concerned with insulating her rulings on appeal than with providing a genuinely fair and impartial hearing. Taken together, the record shows a fabricated exercise of judicial will without lawful judgment and, most critically, void orders that alienated my daughter from me without valid findings of fact, jurisdiction, required statutory hearings, meaningful access to the court, or a fair hearing.

## **8. Gross Abuse of Power, Neglect of Duty, and Obstruction of Appellate Review**

- Failed to enforce contempt against the mother despite clear violations of custody and support orders, including conduct that implicated serious child support and custodial-interference concerns, reflecting a neglect of the duty to enforce court orders even-handedly.

- Delayed rulings on key post-judgment motions, including my motion for relief from judgment under CR 60.02 and related motions to vacate, for extended periods, effectively running out appellate deadlines and obstructing my right to timely review.
- Used these delays and omissions to insulate procedurally defective and unconstitutional orders from meaningful appellate scrutiny.

## **9. Other Remedies Pursued and Institutional Conflicts**

I have already sought relief through the Kentucky Judicial Conduct Commission by filing a formal complaint describing many of the issues summarized in this letter, but the Commission declined to investigate or take action. When these concerns were later presented and referenced in federal court proceedings, no corrective action followed and the challenged orders and practices remained in place. The Judicial Conduct Commission can review ethics complaints and impose discipline, but it cannot correct legal error in individual cases and does not have the constitutional authority to exercise the General Assembly's impeachment power or permanently remove a judge from office.

In addition to my complaint to the Judicial Conduct Commission, I have raised these issues in civil litigation in which both Judge Perlow and the Kentucky Administrative Office of the Courts (AOC) are named. The AOC is the operational arm of the Kentucky Judicial Branch, responsible for administering the Judicial Branch budget, providing administrative and legal support to judges, and managing personnel across all 120 counties. In that litigation, the AOC has declined to take corrective action regarding Judge Perlow's conduct and, instead, is funding and coordinating the dual representation of both itself and the judge, creating an inherent conflict of interest because the same judicial administration that should be ensuring accountability is using public resources to defend the actions that are the subject of my complaint.[file:e2d30dbd-46a6-416f-9a1e-d42becc02b81]

### **Ethics Violations and Conflicts of Interest**

The conduct described above is not only an abuse of judicial and institutional power; it also conflicts with the professional-conduct rules that govern lawyers who represent the Administrative Office of the Courts and Judge Perlow. Under Kentucky's version of the Rules of Professional Conduct, adopted as SCR 3.130, a lawyer may not represent a client if the representation involves a concurrent conflict of interest, including where the representation of one client is directly adverse to another client or where there is a significant risk that the lawyer's responsibilities to one client will materially limit the representation of another. By retaining the same outside firm to defend both the AOC as

an institution and Judge Perlow individually in litigation challenging her conduct, the Judicial Branch created precisely this kind of concurrent conflict, because the AOC's proper role should include supervising and, when warranted, disciplining judges whose conduct exposes the courts to liability, rather than funding a joint defense that aligns the institution's interests with the judge's.

In addition, the Rules of Professional Conduct impose duties to report and to refrain from assisting misconduct. SCR 3.130(8.3) requires a lawyer who knows that another lawyer or a judge has committed serious misconduct to inform the appropriate authority, and SCR 3.130(8.4) defines it as professional misconduct for a lawyer to engage in dishonesty or conduct prejudicial to the administration of justice, or to assist a judge in conduct that violates judicial-conduct rules. When outside counsel and AOC officials chose to use public funds to defend both the AOC and Judge Perlow on the very issues the Court of Appeals had identified as jurisdictional defects and serious irregularities, and when they maintained this joint representation despite legislative findings of weak internal controls and contracting problems at the AOC, they deepened the conflict rather than correcting it and contributed to conduct that undermines confidence in the judiciary.

For these reasons, the General Assembly should view the AOC's Dentons contracts and the joint defense of Judge Perlow not only as a misuse of public resources and a policy failure, but also as a serious ethics problem that implicates the Supreme Court's own professional-conduct rules.

During a 2022 hearing, legislative committees reviewed AOC personal service contracts showing that Dentons Bingham Greenebaum LLP was being retained as outside counsel for the Administrative Office of the Courts. Members questioned why AOC relied almost exclusively on Dentons, whether this complied with the Model Procurement Code and KRS Chapter 45A, and whether it created conflicts of interest when the same firm defended both the AOC and individual judges. My case is one concrete example of those concerns: AOC used these Dentons contracts to fund a joint defense of both the institution and Judge Perlow in federal civil-rights litigation, rather than correcting the misconduct that harmed my family.

Informational Bulletin No. 255 (December 2018), published by the Legislative Research Commission, documents that the General Assembly had already identified significant weaknesses in the AOC's internal controls, financial practices, and oversight, and recommended remedial measures along with annual independent audits. The same bulletin shows that the AOC administers major custody-related and child-welfare expenditures, including guardian ad litem costs, foster-care oversight under House Bill 1, and capital projects that must be reported to the legislature. Despite these findings,

the AOC chose to spend public funds on personal service contracts with Dentons Bingham Greenebaum LLP to defend both itself and Judge Perlow in a federal civil-rights case, highlighting a serious conflict of interest and a continuation of the accountability problems the legislature had already identified.[file:e2d30dbd-46a6-416f-9a1e-d42becc02b81]

Subsequent Judicial Branch budget updates and informational materials show that these responsibilities and funding streams have continued and expanded in the years since IB 255. Judicial Branch budget presentations for the 2024–2026 biennium and Local Facilities Fund updates confirm that the AOC continues to administer salaries and benefits for Judicial Branch officials and staff, operating and capital costs for court facilities, and use-allowance and maintenance payments to counties under KRS Chapter 26A. These materials reinforce that the AOC remains the central fiscal and administrative authority for court operations, facilities, and child-related court services across Kentucky, so its decision to fund Dentons' joint defense of itself and Judge Perlow directly affects families and counties statewide.

## **10. Scope of Judicial Authority and Public Concern**

In addition to my case, multiple recent appeals from Calloway and Marshall family courts demonstrate that Judge Stephanie J. Perlow routinely presides over high-stakes termination of parental rights, juvenile, adoption, custody, and divorce matters. These include:

- *K.E.I. v. Commonwealth, Cabinet for Health and Family Services* (No. 2023-CA-0903-ME)
- *K.O. v. Commonwealth, Cabinet for Health and Family Services* (No. 2023-CA-0897-ME)
- *J.Q.W. v. Commonwealth* (No. 2022-CA-1230-ME)
- *J.S. v. Cabinet for Health and Family Services* (No. 2022-CA-0478-ME)
- *Ashley Marie Luna v. Luna-Cervantes* (No. 2021-CA-0862-MR)
- *Lance Richard Motter v. Motter* (No. 2024-CA-1369-MR)
- *Ron Rock v. Amy Patterson* (No. 2024-CA-0384-MR)

Taken together, these opinions confirm that Judge Perlow exercises far-reaching authority over the custody, parental rights, and property of families in western Kentucky. Her repeated disregard of jurisdictional limits, statutory safeguards,

and due process in my case therefore represents not only a personal injustice but an urgent public concern appropriate for impeachment review by the General Assembly.

### **Why Legislative Action Is Required**

The Kentucky Court of Appeals opinion in No. 2024-CA-0384-MR documents critical defects in the proceedings, including the absence or mishandling of the mandatory emergency hearing, failures to address contempt, and reliance on questionable or unsupported testimony. These are not mere judicial errors correctable on appeal; they are jurisdictional defects and constitutional violations that render the affected orders void ab initio and outside the scope of lawful judicial discretion.

Kentucky precedent on child support arrearages, including *Raymer v. Raymer*, *Sallee v. Sallee*, and *Lichtenstein v. Barbanel*, confirms that past-due installments become final judgments that cannot be retroactively forgiven, yet the court in this case effectively erased a substantial arrearage and disregarded the governing law. Judge Perlow's conduct has deprived me of parental rights, financial rights, and constitutional protections, and it constitutes misconduct in office, fraud upon the court, gross abuse of power, and neglect of duty.

Under the Kentucky Constitution, the House of Representatives has the sole power of impeachment and the Senate conducts impeachment trials for civil officers, including judges, whose misconduct in office undermines the integrity of the judiciary. In this situation, legislative action is necessary to protect both the rule of law and the public's confidence in the courts.

### **REQUEST**

For these reasons, I respectfully urge you to initiate impeachment proceedings against Judge Stephanie J. Perlow. Impeachment in this context is not about disagreement with particular rulings; it is about protecting the judiciary from sustained misconduct, enforcing constitutional and statutory limits on judicial power, and restoring public confidence in Kentucky's courts. The people of Kentucky deserve judges who uphold the law, not those who disregard it.

In addition to impeachment proceedings, I respectfully ask that you seek the immediate suspension of Judge Perlow from exercising judicial duties while these matters are investigated. The families of Kentucky have a vital interest in ensuring that custody, support, and family-law decisions are made by judges who respect jurisdictional limits, follow controlling law, and protect the due process rights of all litigants. I no longer have

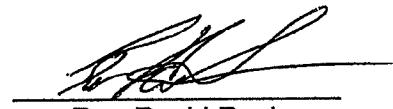
a relationship with my daughter because of this fabricated and unlawful course of conduct by Judge Stephanie Perlow.

If requested, I am prepared to provide supporting documentation, including relevant court orders, transcripts, my complaint to the Judicial Conduct Commission, filings involving the Administrative Office of the Courts, and the appellate opinion in No. 2024-CA-0384-MR, to substantiate each of the specific grounds described above.

For your convenience, I have attached the Kentucky Court of Appeals opinion in No. 2024-CA-0384-MR, which describes many of the jurisdictional and procedural defects summarized in this letter

Thank you for your attention to this critical matter and for your service to the people of Kentucky.

Sincerely,



Ron David Rock

1450 Bluebird Lane  
Paducah, Kentucky 42003  
(270) 201-4623  
Roncourtdocs@gmail.com

December 5, 2025

# **ADDENDUM TO ARTICLES OF IMPEACHMENT REGARDING AOC–DENTONS CONTRACTS AND OVERSIGHT CONFLICTS**

Submitted by Citizen Petitioner Ron David Rock

## **I. The Dentons–KBA Financial and Institutional Nexus**

Dentons Bingham Greenebaum LLP is not merely AOC's outside defense counsel; it is financially and professionally intertwined with Kentucky's organized bar. The firm is a recurring sponsor of the Kentucky Bar Association's Annual Convention and other bar events, listed alongside other firms under "Specialty Break Sponsors" and similar categories, and its lawyers are active in KBA sections and bar-related programming. This institutional partnership creates an inherent conflict when the KBA is asked to impartially review ethical complaints against Dentons attorneys who are simultaneously paid defenders of the judiciary and financial supporters of the bar itself.

## **II. Evasion of Procurement Oversight in AOC Contracts**

The Administrative Office of the Courts' personal-service contracts with Dentons reveal a pattern that appears designed to avoid legislative scrutiny. When first downloaded from the Legislative Research Commission's database, a Dentons contract for my case appeared with a base amount of \$20,000 and a subsequent \$10,000 amendment. In a later search of the same database, Dentons appeared on the "personal service contracts for \$10,000 and under" list at exactly \$10,000, the statutory threshold below which contracts are exempt from routine review by the Government Contract Review Committee under KRS 45A.700. I retained copies of both versions, and the existence of these differing reports raises serious questions about whether AOC is structuring or reporting contracts in amounts deliberately intended to circumvent ordinary procurement oversight and transparency.

## **III. Dismissal of Bar Complaints and Deflection of Ethics Allegations**

I filed written bar complaints under SCR 3.150 against several attorneys involved in my case, alleging clear conflicts of interest and unprofessional conduct. Each

was dismissed at intake. The dismissal of the complaint against Melissa Norman Bork is particularly telling. The KBA's response concluded by stating that "the disciplinary process is not a substitute for your remedies in court," thereby deflecting the specific conflict-of-interest allegations and characterizing the complaint as a misuse of the process. This pattern illustrates how even properly filed complaints raising concrete ethical violations can be summarily dismissed rather than meaningfully investigated when they involve attorneys connected to the firm that defends the judiciary and sponsors the bar.

#### **IV. The Closed Loop of Kentucky Judicial Oversight**

In my case, every formal oversight avenue is controlled by the same interconnected institutions. The Executive: Governor Andy Beshear appointed Judge Stephanie J. Perlow and also appointed the citizen members of the Judicial Conduct Commission (JCC). The Organized Bar: the Kentucky Bar Association's governing body appoints the lawyer members of the JCC, and the KBA, which receives sponsorship and partnership from Dentons, dismissed my conflict-of-interest complaints against AOC and Dentons counsel. The Judiciary's Administration: the AOC, which should ensure judicial accountability, instead uses public funds to hire Dentons and the same firm deeply embedded in the KBA, to defend both itself and Judge Perlow. The result is a closed loop: the Governor who appointed the judge helps shape the commission that reviews her; the bar that partners with the judge's defense firm selects the lawyers who sit in judgment; and the judiciary's administrative arm pays that same firm to shield the judge from accountability. This structure is not designed for oversight; it is designed for protection.

The same loop appears in my federal case, Rock v. Perlow et al., No. 5:24-cv-00181 (W.D. Ky.), where AOC and Dentons again appeared as counsel, and the court dismissed my claims without ever addressing the void state-court orders, erased arrearages, and conflicts of interest documented in the Kentucky Court of Appeals opinion in Rock v. Patterson, No. 2024-CA-0384-MR. [file:981d7b49-6cfc-4095-8f5f-10dbaad7687c] The federal proceedings mirror the same pattern of procedural stonewalling and institutional self-protection that I encountered before the JCC and KBA, further underscoring that this is a systemic problem rather than an isolated judicial error.

## **V. Conclusion**

This addendum demonstrates that the misconduct alleged in the Articles of Impeachment is not an isolated failure but the predictable output of a system engineered to avoid accountability. The financial entanglement of Dentons with the KBA, the apparent evasion of contract oversight, the dismissal of ethics complaints without inquiry, and the interlocking appointments controlling judicial discipline collectively represent a systemic breakdown that undermines the rule of law and public trust. Legislative intervention through impeachment is now the only remaining constitutional check on this captured system.

**Respectfully submitted,**



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Ron Rock  
1450 Bluebird Lane  
Paducah, Kentucky 42003  
(270) 201-4623  
Roncourtdocs@gmail.com

December 5, 2025

Attached as exhibits:

- Exhibit KBA complaint
- Exhibit KBA response
- Exhibit New financial disclosure

# KENTUCKY BAR ASSOCIATION

514 WEST MAIN STREET  
FRANKFORT, KENTUCKY 40601-1812

(502) 564-3795  
FAX (502) 564-3225



## NOTICE OF RETURN UNDER SUPREME COURT RULE 3.160(3)

**TO:** Ron Rock  
1450 Bluebird Lane  
Paducah KY 42003

**RE:** Melissa Norman Bork

**OBC No.:** 25-ID-0309

**DATE:** September 4, 2025

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Pursuant to SCR 3.160, every sworn written complaint against an attorney for unprofessional conduct goes through an initial review by the Office of Bar Counsel to determine whether it alleges an ethical rule violation Bar Counsel can investigate or is appropriate for alternative disposition. If Bar Counsel deems the complaint does not state an ethical violation or is not suitable for alternative disposition, we will decline, without investigation, to entertain it.

After review, your complaint was determined to not have stated an ethical violation suitable for a more thorough investigation or alternative disposition. For that reason, it is being returned to you and will not be investigated further. We understand you may disagree with this decision. If you do, you may resubmit your information on a new complaint form. Please note that simply resubmitting your complaint without additional information will result in that complaint being returned to you without further investigation.

The disciplinary process is not a substitute for your remedies in court. You will need to seek legal counsel of your choice for advice on what legal actions that you can take, if any. The Office of Bar Counsel cannot give you any legal advice about any rights that you might have.

Enclosure (original complaint)

MAIL COMPLAINT BACK TO:

KENTUCKY BAR ASSOCIATION  
OFFICE OF BAR COUNSEL  
514 WEST MAIN STREET  
FRANKFORT KY 40601-1812

KENTUCKY BAR ASSOCIATION  
(Revised 05/17)

AUG 26 2025

RECEIVED IN BAR COUNSEL

## COMPLAINT FORM

*(Please type or print in black ink)*

NAME AND ADDRESS OF COMPLAINANT (Please print)

DATE: 7/14/2025

Ron Rock

HOME #: \_\_\_\_\_

1450 Bluebird Ln

CELL #: 270 201 4623

Paducah, Kentucky 42003

EMAIL: Roncourtdocs@gmail.com

### NAME & ADDRESS OF ATTORNEY AGAINST WHOM COMPLAINT IS MADE

Melissa Norman Bork

3500 PNC Tower      101 S 5th Street

PHONE #: 502 589-4200

Louisville, Kentucky 40202

### IF COMPLAINT INVOLVES COURT CASE, PROVIDE THE FOLLOWING:

CASE NO. 5:24-cv-00181-BJB      PARTY NAMES: Rock v Perlow and al

COURT: West Dist. Kentucky      COUNTY: McCracken      (if state case) ACTIVE CASE? Yes / No

### COMPLAINT INSTRUCTIONS

*(Please read carefully)*

1. Supreme Court Rule 3.150 provides this matter is confidential until the Inquiry Commission or its Chair has acted.
2. The KBA investigates Complaints on behalf of the Kentucky Supreme Court and does not represent the Complainant or the Attorney (Respondent).
3. The attorney listed above will receive a copy of this complaint and be asked to respond to the allegations.
4. Complaints against law firms are not accepted. For complaints involving more than one attorney, use a SEPARATE form for each attorney and include details and exhibits specific to that attorney only. Do not combine details or exhibits into one document and attach to multiple complaints. If comments about a complaint filed against another attorney other than the one on the listed on the form are included in the details, it will be returned.
5. Every complaint must have an original notarized signature. Copied signatures will not be accepted.
6. Attach COPIES of documentation only, i.e., receipts, contracts, etc. Do not send originals.
7. State specifically what the attorney did or failed to do which constitutes unethical conduct. If drugs, alcohol or mental disability are believed to have affected the lawyer's representation, please state facts in support of that belief.
8. Provide the names, addresses, and phone numbers of any witnesses.
9. Do not bind the complaint.
10. If money was lost due to dishonesty, fraud, or other unethical conduct within the attorney/client relationship, contact the Office of Bar Counsel to request a Client's Security Fund claim form. Claims must be filed no later than two years after you knew or should have known of the attorney's dishonest conduct. Forms are also available on our website [www.kybar.org](http://www.kybar.org).

## DETAILS OF COMPLAINT

More pages may be added if necessary.

### Dual Representation & Malpractice of Melissa Bork

Melissa Bork engaged in a pattern of professional misconduct by representing both Judge Stephanie Perlow and the Kentucky Administrative Office of the Courts (AOC) in the same active litigation without disclosure, waiver, or procedural consent. She submitted pleadings under this dual role despite financial entanglement confirmed through public AOC contracts (Nos. 2500001728 and 2500001778). These acts violate Kentucky SCR 3.130(1.7) and constitute malpractice.

Specific violations include:

Undisclosed dual representation between a sitting judge and her institutional regulator

Conflict-tainted pleadings filed before AOC's formal appearance

Malpractice exposure based on Sheppard Mullin v. J-M Mfg. Co. standards

Concealment of public funding exceeding \$30,000 in taxpayer support for defense coordination

Retaliatory posture and ethical disregard for constitutional filings presented by Plaintiff

This conduct has prejudiced Plaintiff's right to a fair adversarial process, obstructed discovery, and tainted proceedings with institutional bias. Copies of related AOC contracts and defense pleadings are available upon request or can be attached as exhibits.

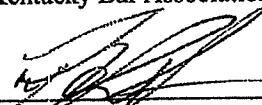
misrepresentation under SCR 3.130(8.4).

No factual rebuttal: They didn't say your allegations are untrue—only that it's "past the deadline."

Judicial estoppel risk: If Bork or Perlow previously engaged on jurisdiction, their "too late" defense may violate New Hampshire v. Maine.

Malpractice element: A competent attorney, facing dual representation and funding conflict, should never rely on technicality alone—especially when constitutional rights and public contracts are involved.

I swear the foregoing statements are true and correct to the best of my knowledge and belief and I will voluntarily appear and testify to the facts in the complaint if called upon to do so by the Kentucky Bar Association.

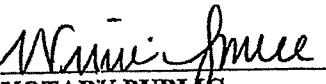
  
SIGNATURE OF COMPLAINANT

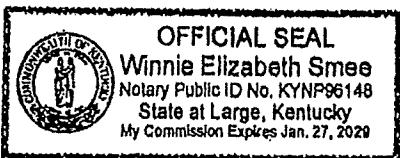
### NOTARY'S CERTIFICATE

COMMONWEALTH/STATE OF: Kentucky)

COUNTY OF: McCracken)

The above complainant, Lon Rock, (print complainant's name) appeared before me in person, and the complaint being subscribed and sworn to before me, a Notary Public, in and for the State and County this the 11st day of August, 2025.

  
NOTARY PUBLIC  
My Commission expires: 1/27/29



# Bar Complaint Memorandum

**Submitted To:** Kentucky Bar Association Office of Bar Counsel **Respondent:** Melissa Bork, Dentons LLP **Matter:** *Rock v. Perlow*, WD Ky. No. 5:24CV181-BJB **Prepared By:** Ron David Rock, Pro Se **Date:** July 23, 2025

## I. Summary of Violations

The undersigned respectfully submits this complaint against attorney Melissa Bork for repeated violations of the Kentucky Rules of Professional Conduct, resulting in obstruction, misrepresentation, and direct interference with a federal judicial proceeding. These violations are not isolated—they form part of an institutional pattern involving Dentons LLP and the Administrative Office of the Courts.

## II. Concurrent Conflict of Interest (SCR 3.130(1.7)(a)(2))

**Conduct:** Ms. Bork simultaneously represents Judge Perlow (as an individual defendant) and the Administrative Office of the Courts (AOC)—the body tasked with judicial oversight.

### Proof:

- Dentons LLP contract #2500001728, publicly funded by the AOC
- Federal filings in WD Ky. Case No. 5:24CV181-BJB naming both Perlow and AOC as defendants
- Bork's appearances and filings on behalf of both entities

**Impact:** Bork cannot zealously represent both clients where the AOC may have investigatory obligations and Perlow faces direct allegations of misconduct. This violates *Williams v. Pennsylvania*, 579 U.S. 1 (2016).

## III. Evidence Suppression & Discovery Fraud (SCR 3.130(3.4)(a))

### Conduct:

- Refused to produce billing records confirming AOC's payment of Perlow's defense
- Misrepresented jurisdictional timelines in DN 72, falsely asserting KRS 403.280(3) is irrelevant
- Withheld ADA sanctions and sealed juvenile records central to Plaintiff's constitutional claims

**Impact:** These actions obstruct discovery, conceal conflicts, and impair the integrity of federal adjudication. Bork knowingly deprived the court of core financial disclosures and statutory context.

#### **IV. False Statements to Tribunal (SCR 3.130(3.3)(a))**

**Conduct:** DN 72 and related filings contain deliberate mischaracterizations of statutory mandates:

Defense claim: "KRS 403.280 does not mandate custody hearings." Statutory reality: "The court shall hold a hearing... within thirty (30) days..." — KRS 403.280(3)

**Impact:** Bork's misstatement misled the court and prejudiced the record against Plaintiff. False assertions about black-letter law constitute misconduct under *In re Ellis*, 504 S.W.3d 128 (Ky. 2016).

#### **V. Conduct Prejudicial to the Administration of Justice (SCR 3.130(8.4)(c)/(d))**

**Conduct:**

- Blocked access to transcripts of void orders (June 30, 2021 hearing)
- Delayed Judicial Conduct Commission action despite record notice
- Filed frivolous opposition to discovery and disqualification motions despite documented conflicts

**Impact:** This conduct reinforces judicial bias and undermines procedural fairness in active litigation. Dentons LLP is enabling misconduct rather than upholding ethical guardrails.

#### **VI. Relief Requested**

- **Immediate interim suspension** of Bork's law license pending investigation
- **Permanent disqualification** of Dentons LLP from cases involving Judge Perlow or the AOC
- **Audit and public release** of all Dentons-AOC contracts since 2020
- **Referral to the Sixth Circuit Judicial Council** under 28 U.S.C. § 351
- Confirmation that Bork's conduct violated SCR 3.130 and prejudiced a federal case involving civil rights and constitutional harm

#### **VII. Supporting Exhibits**

- **Exhibit A** – Contract #2500001728 (AOC-Dentons funding confirmation)
- **Exhibit B and C** – Responses from Bork showing the dual representation that was never disclosed and meaningless response to evade engagement.

**PERSONAL SERVICE CONTRACTS FOR \$10,000 AND UNDER LIST- FEBRUARY 2025**

AGENCY/ VENDOR	EFFECTIVE DATES	CONTRACT TYPE	CONTRACT AMOUNT	FUNDING SOURCE/ PAY SCHEDULE	CONTRACT DESCRIPTION
<b><u>ADMINISTRATIVE OFFICE OF THE COURTS</u></b>					
1. 2500001728 Dentons Bingham Greenebaum, LLP 101 South Fifth Street Louisville, KY 40202	December 30, 2024 - June 30, 2026	Legal	\$10,000.00	General 100%; \$125 per hour; Monthly.	Provide funds to review all documentation relating to Ron D. Rock v. Judge Stephanie Perlow, et. al., WDKY Case #5:24-cv-181 and provide representation for Judge Stephanie Perlow and AOC, throughout all related proceedings until the matter has been resolved.
<b><u>EASTERN KENTUCKY UNIVERSITY</u></b>					
2. 2500001778 Dentons Bingham Greenebaum, LLP 101 South Fifth Street Louisville, KY 40202	January 17, 2025 - June 30, 2026	Legal	\$10,000.00	General 100%; \$125 per hour; Monthly.	Provide funds to review all documentation relating to Hawkins, et.al. vs. HSWE, et. al., USDC W. D. Kentucky Case 5:23-cv-83-BJB and provide representation for AOC throughout all related proceedings until the matter has been resolved.
3. 2500001779 Morgan & Pottinger, PSC 601 West Main Street Louisville, KY 40202	January 10, 2025 - June 30, 2026	Legal	\$10,000.00	General 100%; \$125 per hour; Monthly.	Provide funds for legal services and representation for KCCOJ, including document review, consultation, pre-litigation negotiation, and if necessary, initiating legal action regarding the Jessamine County Circuit Clerk's Office bank account and the recovery of ACH funds.
4. 3177-2025 Sharon Lott 5920 SW 102nd Street Ocala, FL 34476	March 31, 2025 - June 30, 2025	Sign Language Training	\$5,586.00	Federal 100%; Upon receipt of invoices.	Provide funds for Sign Language Proficiency Interview Rater Training for the American Sign Language and Interpreter Education Department (ASLIE).
5. 3184-2025 Max Williamson 925 Boom Way Annapolis, MD 21401	March 31, 2025 - June 30, 2025	Sign Language Training	\$5,586.00	Federal 100%; Upon receipt of invoices.	Provide funds for Sign Language Proficiency Interview Rater Training for the American Sign Language and Interpreter Education Department (ASLIE).
<b><u>KENTUCKY EMPLOYERS MUTUAL INSURANCE</u></b>					
6. 25-BVG-001 Bluegrass Valuation Group 366 Waller Avenue, Suite 203 Lexington, KY 40514	February 12, 2025 - June 30, 2025	Appraisal	\$1,750.00	KEMI 100%; Upon receipt of invoices.	Provide funds for property appraisal services for real property located at 1068 Aspiration Drive, Lexington, KY.
2/4/2025 9:24 AM Goldentrod					

## **Articles of Impeachment Proposed by Citizen Petitioner Ron Rock Against Judge Stephanie J. Perlow, Marshall Family Court**

These proposed Articles of Impeachment are submitted by citizen petitioner Ron Rock as a detailed statement of the grounds described in my accompanying letter, for consideration by the Kentucky House of Representatives under KRS 63.030 and Sections 66–68 of the Kentucky Constitution.

### **Article I – Abuse of Judicial Authority and Denial of Due Process**

Judge Perlow repeatedly exercised jurisdiction without statutory authority, failing to initiate mandatory emergency custody and temporary removal hearings under KRS 620.060 and KRS 620.080, and entering custody orders absent lawful jurisdiction. She permitted litigants acting in contempt and bad faith to invoke equitable relief, contrary to Kentucky's "clean hands" doctrine, thereby denying due process and undermining the rule of law.

### **Article II – Fabrication of Child Support Records and Financial Misconduct**

Judge Perlow unilaterally erased approximately \$18,000 in child support arrears without motion, waiver, evidentiary basis, or lawful authority, in violation of KRS 403.213, KRS 403.212, and Kentucky Supreme Court precedent (Lichtenstein v. Barbanel; Raymer v. Raymer). She imposed child support based on a one-time stock withdrawal, disregarded statutory guidelines, and excluded verified financial documentation, fabricating findings of fact and depriving vested property rights.

### **Article III – Fraud Upon the Court and Misconduct in Office**

Judge Perlow accepted demonstrably inaccurate testimony wholesale as findings of fact, disregarded material evidence, and entered orders lacking sufficient findings or legal analysis. She openly stated her intent to insulate rulings from appellate review rather than provide fair hearings, thereby committing fraud upon the court and violating her oath of impartiality.

### **Article IV – Gross Abuse of Power, Neglect of Duty, and Obstruction of Appellate Review**

Judge Perlow failed to enforce contempt against parties violating custody and support orders, neglected her duty to apply law even-handedly, and deliberately delayed rulings on post-judgment motions to obstruct appellate review. These actions insulated void and unconstitutional orders from scrutiny, constituting neglect of duty and abuse of judicial power.

## **Article V – Institutional Conflicts and Misuse of Public Resources**

Judge Perlow's conduct is shielded by the Administrative Office of the Courts (AOC), which has funded her defense alongside its own, creating a direct conflict of interest. The AOC's reliance on Dentons Bingham Greenebaum LLP, bypassing procurement laws and representing both itself and judges, has been criticized by the General Assembly and documented in Informational Bulletin No. 255 (2018) and the 2022 Senate Judiciary Committee hearing. This misuse of public resources undermines accountability and public trust.

## **Article VI – Aiding in the Concealment of a Felony**

Judge Perlow's unlawful erasure of child support arrears and refusal to enforce contempt concealed conduct that constitutes felony flagrant non-support under KRS 530.050. By fabricating records and obstructing enforcement, she aided in the concealment of felony child support violations, thereby undermining statutory enforcement entrusted to the Attorney General and county attorneys. This constitutes misconduct in office and abuse of judicial authority.

## **Article VII – Abuse of Judicial Authority Resulting in Unlawful Custody Deprivation**

Judge Stephanie J. Perlow exercised judicial authority to unlawfully deprive me of custody of my daughter by rewriting and fabricating orders outside the scope of lawful jurisdiction. By failing to conduct the mandatory emergency custody and temporary removal hearings required under KRS 620.060 and KRS 620.080, and then issuing orders that alienated my child from me, Judge Perlow acted without lawful authority. These actions constitute an abuse of judicial power tantamount to using the authority of her office to effectuate the unlawful removal of a child, thereby violating constitutional due process protections and exceeding the bounds of judicial discretion.

## **Article VIII – Complicity and Institutional Conflicts**

## **Judge Perlow's misconduct has been shielded by overlapping institutions:**

- **County Attorney:** In cases where the county attorney appeared to represent Judge Perlow personally, the prosecutorial independence required by Kentucky law was compromised. This dual role aided concealment of misconduct and obstructed enforcement of felony child support obligations under KRS 530.050.
- **Judicial Conduct Commission (JCC):** Despite receiving a formal complaint detailing jurisdictional defects and misconduct, the JCC declined to investigate or act, thereby failing its oversight duty and allowing misconduct to persist unchecked.
- **Administrative Office of the Courts (AOC):** The AOC funded and coordinated defense for both itself and Judge Perlow, using public resources to shield misconduct. This practice, criticized in Informational Bulletin No. 255 (2018) and the 2022 Senate Judiciary Committee hearing, bypassed procurement laws and created conflicts of interest that undermine transparency and accountability.

## **Article IX – Obstruction of Enforcement of Court Orders**

In my case, the county attorney refused to enforce valid court orders and actively prevented law enforcement officers from carrying out those orders. This obstruction deprived me of lawful remedies, undermined the authority of the judiciary, and concealed ongoing violations of custody and child support obligations. By halting enforcement, the county attorney aided in the concealment of misconduct and contributed to the unlawful deprivation of parental rights. Judge Perlow's reliance on this refusal further entrenched the abuse of judicial authority and obstructed the rule of law.

## **Article X – Failure of Child Support Enforcement**

Despite its statutory duty to enforce child support obligations, the Child Support Office refused to take action in my case unless a new order was entered, even though arrears and obligations already existed and enforcement was required under Kentucky law. By declining to enforce existing orders and insisting on new judicial action, the Child Support Office abdicated its role as the enforcement arm of the Commonwealth. This refusal concealed ongoing violations of child support law, obstructed enforcement of vested arrearages, and contributed to the

unlawful deprivation of financial rights. Judge Perlow's erasure of arrears and fabrication of orders compounded this failure, creating a closed loop of misconduct and non-enforcement.

## **Article XI – Coordinated Concealment and State-Organized Deprivation of Rights**

The Judicial Conduct Commission (JCC), Administrative Office of the Courts (AOC), county attorney, and Attorney General all reviewed the Kentucky Court of Appeals opinion in No. 2024-CA-0384-MR, which documented jurisdictional defects and void orders. Despite clear knowledge of these defects and of felony child support obligations under KRS 530.050, none of these institutions took corrective action. Instead, they collectively refused to investigate, enforce, or remedy the violations, thereby uniting in a cover-up that deprived me of my last opportunity to restore custody and support before my daughter reached the age of majority. This coordinated inaction constitutes a state-organized deprivation of parental rights and concealment of felony child support violations, undermining the rule of law and public trust in Kentucky's judiciary.

## **Article XII – Coordinated Concealment, Collusion, and Racketeering**

Judge Stephanie J. Perlow, in concert with the Judicial Conduct Commission (JCC), Administrative Office of the Courts (AOC), county attorney, and Attorney General, engaged in coordinated concealment of void orders and felony child support violations. These institutions knowingly refused to enforce existing law, obstructed appellate review, and united in a cover-up until my daughter reached the age of majority. This collusion constitutes racketeering activity under color of state authority, as public resources and official positions were used to perpetuate unlawful deprivation of parental rights, conceal felony conduct, and insulate misconduct from accountability. Such coordinated concealment and collusion undermine the integrity of Kentucky's judiciary and amount to state-organized racketeering.

### **Resolution**

Therefore, the Kentucky House of Representatives hereby resolves to impeach Judge Stephanie J. Perlow for abuse of judicial authority, fabrication of records, fraud upon the court, gross neglect of duty, obstruction of appellate review,

misuse of public resources, aiding in the concealment of felony child support violations, unlawful deprivation of parental rights, and coordinated concealment of misconduct. The House further directs that these Articles, together with supporting evidence, be transmitted to the Senate for trial pursuant to Section 66 of the Kentucky Constitution, and that all evidence of felony concealment and obstruction be referred to the Attorney General for investigation and prosecution under KRS 530.050.

If the Kentucky Attorney General fails or refuses to prosecute the concealment of felony child support violations and related misconduct, the House shall transmit all evidence to the United States Department of Justice for investigation and prosecution of all officials involved, pursuant to federal civil rights and corruption statutes.

Sincerely,



Ron David Rock

1450 Bluebird Lane  
Paducah, Kentucky 42003  
(270) 201-4623

Roncourdocs@gmail.com

December 5, 2025

## AFFIDAVIT IN SUPPORT OF PETITION FOR IMPEACHMENT

STATE OF KENTUCKY  
COUNTY OF MARSHALL/MCCRACKEN

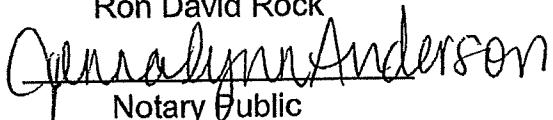
I, Ron Rock, being duly sworn, state as follows:

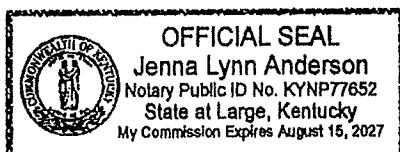
1. I am a citizen of the Commonwealth of Kentucky, residing at 1450 Bluebird Lane, Paducah, Kentucky 42003, and a constituent of Senate District 2 and House District 1.
2. This affidavit I made in support of my petition to the Kentucky House of Representatives, pursuant to KRS 63.030 and Sections 66–68 of the Kentucky Constitution, requesting impeachment proceedings against Judge Stephanie J. Perlow of the Marshall Family Court.
3. The facts set forth in my enclosed Formal Request for Impeachment Proceedings Against Judge Stephanie J. Perlow, including the specific grounds listed there, are true and correct to the best of my knowledge and belief.
4. I have reviewed the Kentucky Court of Appeals opinion in No. 2024-CA-0384-MR and the other exhibits attached to my petition, and my descriptions of those materials in the petition accurately reflect their contents.[file:981d7b49-6cfc-4095-8f5f-10dbaad7687c][file:5fddeb8f-6526-42b8-970a-ed22860576a2]
5. I submit this petition and affidavit in good faith, with knowledge that false statements made herein are subject to prosecution under the laws of the Commonwealth of Kentucky.

Further, affiant sayeth not.

Signed, sworn to, and subscribed before me, the undersigned Notary Public, this  
11 day of December, 2025

  
Ron David Rock

  
Jenna Lynn Anderson  
Notary Public



My Commission Expires: 08-15-2027

RENDERED: JULY 11, 2025; 10:00 A.M.  
NOT TO BE PUBLISHED

**Commonwealth of Kentucky**  
**Court of Appeals**

NO. 2024-CA-0384-MR

RON ROCK

APPELLANT

v. APPEAL FROM MARSHALL FAMILY COURT  
HONORABLE STEPHANIE J. PERLOW, JUDGE  
ACTION NO. 10-J-00265

AMY PATTERSON

APPELLEE

OPINION  
AFFIRMING

\*\*\* \* \* \* \*

BEFORE: EASTON, ECKERLE, AND TAYLOR, JUDGES.

TAYLOR, JUDGE: Ron Rock appeals the Marshall Family Court's order entered on February 20, 2024, denying his motion for relief from judgment pursuant to Kentucky Rules of Civil Procedure (CR) 60.02, and awarding attorney fees to Amy Patterson. For the following reasons, we affirm.

BACKGROUND

On March 24, 2011, the Marshall Family Court entered a judgment awarding joint custody of their minor child to Rock and Patterson. The court

designated Rock as the residential parent, and granted visitation to Patterson. The court ordered Patterson to pay child support in the amount of \$182.60 per month, effective April 1, 2013.

On October 14, 2020, Patterson filed a motion to modify timesharing on the basis that the child had exclusively lived with her since approximately August of 2019, and there had been a material change in circumstances since the prior custody order. She asked to be named the primary residential custodian. She also filed a notice of withholding, stating that she intended to deny Rock visitation because she thought he was in possession of and using drugs, and moved for the court to order Rock to submit to a drug screen. The result of the court-ordered drug test was that Rock tested positive for methamphetamine use in March of 2021.

On May 19, 2021, Rock filed a motion and order for rule, asking that Patterson be required to show cause why she should not be held in contempt for failure to abide by the March 24, 2011, order for custody/visitation and payment of child support. His affidavit in support stated that Patterson had paid less than the full amount of child support ordered and had only paid in some of the years he was residential custodian. He alleged an arrearage of approximately \$10,538.40 as of April 1, 2020, his estimate of when the child started residing with Patterson.

On June 30, 2021, the Marshall Family Court held an evidentiary hearing on the foregoing motions. As to his financial position, Rock testified that he had taken out savings and had been trading in penny stocks, but lost \$240,000 in 2019, after which he had no choice but to sell his house. He stated that since then he had been living on withdrawals from his stock market account of cumulatively \$50,000 in the past year. He reported that he was unemployed but intended to start a handyman business. He testified that after taking out the approximately \$50,000 over the course of the year, he had about \$70,000 remaining in the account. Patterson testified that she was receiving \$1,600 from an investment account,<sup>1</sup> and had no other income. Patterson was not questioned about her assets during the hearing.

On July 30, 2021, the court entered an Order Modifying Timesharing. The court found that both parties testified they did not follow the timesharing schedule entered by the court in its 2011 order. The court found that Patterson should not be held in contempt because she had withheld visitation from Rock out of safety concerns for their child. The court established Patterson as the primary residential parent. The court attributed income to Rock of \$45,000 a year and used

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<sup>1</sup> Amy Patterson called this a retirement account, and the court's orders followed suit, but since this apparently consisted of the money she inherited, we will refer to it as an investment account.

Patterson's reported income of \$1,600 a month to arrive at a child support obligation for Rock of \$493.50 per month under child support guidelines.

Within ten days of judgment, on August 9, 2021, Rock filed a motion to alter, amend, or vacate the court's order pursuant to CR 59.05, which stated:

The Court failed to issue a ruling on Respondent's Motion for Rule for Petitioner's failure to pay child support. For a period of time up until August 2019, when the child went to live with the Petitioner, the Petitioner failed to pay her child support as Ordered and Respondent would request a ruling calling for an offset of those unpaid funds against his child support obligation.

Record at 165.

Patterson's reply asserted that Rock had testified at the most recent hearing that "(a) the parties had operated under an agreement in which money was deposited into a college savings account for the minor child; and (b) that he did not wish to recoup any back child support from Petitioner." Record at 178.

Neither of these statements were accurate as to what Rock expressed at the hearing. While Rock testified that the parties agreed in 2016 to at least put \$100 each monthly into an account for the child's college, he stated: "That's what we actually talked about, the only time, like it *wasn't in lieu of anything else*, it was let's just do something." June 30, 2021, video record at 2:15. Furthermore, Patterson did not testify that paying into the college fund was intended to be a new support agreement between the parties. The testimony of both contradicts the

claim that their establishing a shared college fund was intended to supplant Patterson's child support obligation.

Additionally, Rock did not waive his entitlement to the child support arrearage at the hearing. Rock testified that the parties had never agreed to relieve Patterson from her child support obligation when the parties were sharing a residence from 2014 to 2016. And, at the time of the hearing, Rock had a pending motion for contempt for Patterson's failure to pay the 2011 child support obligation, which was never withdrawn.

When the motion to alter, amend, or vacate came on for a hearing on September 1, 2021, the court instructed that a ruling would be rendered after reviewing the video, and asked counsel to provide citations to the hearing where testimony was given regarding Patterson's lack of payment of child support, which Rock's counsel complied with on October 14, 2021. The court eventually entered an order on December 7, 2021, ruling:

1. Upon review of the court file and copy of the hearing, regarding the failure of the court to address the motion for rule of the Respondent, the Court, in its Order of July 30, 2021, page 3, numerical paragraph 1 under **Judgment** states as follows: Ron's Motion for Rule and request for attorney's fees are hereby DENIED." The Court declines to alter, amend or vacate that portion of its order and their motion is DENIED.

2. The court declines to offset the child support as requested in the Respondent's Motion to Alter, Amend, or Vacate. The motion is DENIED.

Record at 197.

As Rock correctly notes in his brief on appeal, while the court had ruled on the Motion for Rule, it was only as to Patterson's withholding visitation, and left unaddressed her child support arrearage. The court simply declined to offset any support owed by Patterson against that owed by Rock. However, neither the court's Order Modifying Timesharing of July 30, 2021, nor the Order Regarding Motion to Alter, Amend or Vacate entered December 7, 2021, were appealed.

On February 17, 2022, Rock had obtained new counsel, who filed a Verified Motion for Judgment on Past Due Child Support. The motion recounted that Patterson's obligation to pay child support under the March 24, 2011, order was not altered until the court's July 30, 2021, order, and the court had not allowed Rock a credit or offset for the past due child support owed by Patterson. The motion alleged that Rock was entitled to a judgment for the unpaid child support of approximately \$18,077. Record at 201.

Also on that date, Rock filed a Motion to Modify Child Support stating that the court imputed income to him derived from the single-year withdrawal from his stock accounts, and asked the court to consider his current

income which represented a decrease in excess of 15 percent of his child support obligation. His affidavit in support, with information about his past and current actual income, asserted his entire income since July of 2021 equated “to \$1,875 month averaged over that time.” Record at 204.

Patterson again responded that Rock had testified that the parties had agreed that Patterson would put money into an account for the minor child in lieu of child support. Patterson noted that Rock had “sought to have Patterson held in contempt of court for the very same issue he now brings in the form of a request for judgment,” and noted the Court’s previous denials of Rock’s requests. Record at 216.

By order entered on April 29, 2022, the family court denied both motions. Therein, the court stated in part as to the child support issues:

1. Motion for Judgment on Past Due Child Support

It is ordered that the motion for judgment of past due child support be DENIED. The issue of past due child support has been addressed by previous orders of this court.

2. Motion to Modify Child Support

Inasmuch as the parties are going through counseling with their child with regard to child support and timesharing, it is not ordered that, at this point, Ron’s motion to modify child support be addressed. It is ordered that the motion be held in abeyance until further counseling and visitation has been accomplished between the minor child and Ron.

Record at 247. Again, the April 29, 2022, order was not appealed.

On November 1, 2022, Rock, *pro se*, filed a motion to modify child support. He argued that the court's order denying his back child support was unjust. To contradict Patterson's claim that they had a different agreement to pay only \$100, he attached a copy of a letter showing his attorney had asked Patterson to begin paying child support in November 2016. Rock stated that Patterson could afford to pay the arrearage since she had inherited \$365,000, and received \$1,600 monthly from that inheritance.

Patterson responded with a motion to strike on grounds that Rock did not state a basis to modify, and did not state whether he had completed the counseling which the court ordered in its April 29, 2022, order placing the child support issue in abeyance. In addition, Patterson argued that Rock was seeking to vacate a prior order and the time for that had long since passed. On November 29, 2022, the court granted the motion to strike on the basis that Rock had not completed counseling, and set the matter for a hearing in January. In addition, the court agreed that Rock was attempting to vacate a prior order and the time for such a motion had expired.

In January of 2023, Rock had again obtained new counsel who filed a motion on January 25, 2023, to modify child support on the basis that the court's child support order of July 30, 2021, was based on 2020 income and Rock

presently had significantly reduced income. On that same day, Patterson filed a motion to hold Rock in contempt for failure to pay child support and alleged that he had an arrearage of approximately \$5,435.

The court held an evidentiary hearing on the motions on June 13, 2023. Rock testified that he had only made about \$17,000 from his handyman business in 2022. Since December of 2022, he had worked at a plumbing company and a construction company, and most recently made around \$16 an hour on a 40-hour week. Patterson testified that she had only earned about \$600 in the previous year from independent house-cleaning jobs. She further testified that she received money from her adult son and from friends, and was looking for steady housekeeping work. Patterson also testified that her investment account had been depleted in September of 2022. In an order entered June 20, 2023, the court held that Rock failed to meet the 15 percent deviation requirement in Kentucky Revised Statutes (KRS) 403.213(2) to qualify for a child support reduction, and thus denied his motion to modify child support. The court further ruled that Rock had the ability to pay his child support obligation and was held in contempt for failure to comply with previous orders. Record at 473-475. This order was also not appealed.

On July 18, 2023, counsel for Rock filed a motion to withdraw as counsel and a Motion for Out of Time Appeal. In the Motion for Out of Time

Appeal, Rock requested to file a late appeal of orders denying his motions for alleged child support arrearages owed by Patterson. Rock claimed he was not advised he could appeal and was “in flux between attorneys for some time thereafter.” Record at 496-497. The court granted counsel’s motion to withdraw on July 20, 2023, and on August 10, 2023, entered an order denying Rock’s motion to file a late appeal.

On August 17, 2023, Rock, *pro se*, filed another motion for recalculation of his child support, in which he argued that Patterson had “not been forthcoming with her fiscal reporting or net worth.” Record at 560. Rock wanted to introduce new evidence of Patterson’s actual income since 2019 based on her withdrawals from the investment account. He submitted his summary of the withdrawals in the motion to show that Patterson was withdrawing more than the \$1,600 a month that she had previously testified to. He also reported his current wages. Rock filed another *pro se* motion on September 5, 2023, styled as a motion to withdraw the motion for recalculation, in which he stated he had filed a judicial complaint. The court treated this as a request for recusal, which the court denied by order entered on September 11, 2023. Patterson then filed a motion on September 27, 2023, for sanctions against Rock for his failure to pay child support, and for attorney fees.

On October 23, 2023, Rock, *pro se*, filed yet another motion which is the genesis of the present appeal. He moved to introduce evidence regarding Patterson's income account statements, received through a subpoena of Patterson's investment account. Rock argued that the statements showed Patterson had not been truthful about her income at the hearing in 2023. He asked the court to review her income statements and reconsider the court's ruling regarding the \$18,000 child support arrearage he alleged Patterson owed him. Record at 586.

By order entered November 15, 2023, the family court struck the financial records filed by Rock and concluded that Rock was asking for CR 60.02 relief from the prior orders. The court required the parties to brief the motion. Rock then retained another attorney who entered an appearance for the purpose of briefing the CR 60.02 motion.<sup>2</sup> Rock argued that Patterson's inheritance had not been disclosed to the court. The brief asserted that the account statements, attached to the brief, showed that Patterson "mislead the Court about her actual income and assets during the child support calculation which negatively affected Mr. Rock." Record at 871. He argued that Rock had no means to refute Patterson's testimony as to her income until he obtained the account statements pursuant to a recent response from earlier subpoenas. He also argued that although

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<sup>2</sup> Ron Rock's new attorney filed an entry of appearance and a new motion for Kentucky Rules of Civil Procedure 60.02 relief on January 1, 2024.

the information existed, three previous attorneys hired by Rock were unable to compel the information in earlier discovery attempts. Counsel sought to reopen the matter under CR 60.02(b) “newly discovered evidence” or (d) “fraud affecting the proceedings, other than perjury or falsified evidence.” He asked for an order vacating Rock’s previous child support order, and restoring the arrearages owed to him by Patterson.

Counsel for Patterson responded that the existence of the investment account was known to the court, Rock had made reference to it in his *pro se* motion to modify filed in November of 2022, and the CR 60.02 motion for relief from judgment was not timely or properly invoked. In the court’s order entered February 20, 2024, the family court agreed with Patterson that Rock’s evidence was not newly discovered and the motion was otherwise time-barred under CR 60.02(b). The family court also held there was not sufficient evidence of fraud by Patterson to set ~~aside~~ its previous orders under CR 60.02(d). The court additionally ordered Rock to pay \$1,000 in attorney fees to Patterson for having to defend his frivolous motion. This appeal followed.

#### ANALYSIS

The family court’s denial of a CR 60.02 motion will not be overturned absent an abuse of discretion. *Age v. Age*, 340 S.W.3d 88, 94 (Ky. App. 2011). The test for abuse of discretion is whether the judge’s decision was “arbitrary,

unreasonable, unfair, or unsupported by sound legal principles.” *Commonwealth v. English*, 993 S.W.2d 941, 945 (Ky. 1999).

CR 60.02 allows a court to relieve a party from a final judgment or order upon the following grounds:

- (a) mistake, inadvertence, surprise or excusable neglect;
- (b) newly discovered evidence which by due diligence could not have been discovered in time to move for a new trial under Rule 59.02;
- (c) perjury or falsified evidence;
- (d) fraud affecting the proceedings, other than perjury or falsified evidence;
- (e) the judgment is void, or has been satisfied, released, or discharged, or a prior judgment upon which it is based has been reversed or otherwise vacated, or it is no longer equitable that the judgment should have prospective application; or
- (f) any other reason of an extraordinary nature justifying relief.

The Rule further provides: “The motion shall be made within a reasonable time, and on grounds (a), (b), and (c) not more than one year after the judgment, order, or proceeding was entered or taken.”

CR 60.02 is not intended as an “additional opportunity to relitigate the same issues which could reasonably have been presented by direct appeal.”

*Kentucky Ret. Sys. v. Foster*, 338 S.W.3d 788, 796 (Ky. App. 2010). “[T]he rule was intended to codify the common-law writ of *coram nobis*,” the purpose of which was to bring before the court “judgment errors in matters of fact which (1) had not been put into issue or passed on, (and) (2) were unknown and could not

have been known to the party by the exercise of reasonable diligence and in time to have been otherwise presented to the court.” *Id.*

CR 60.02(b)

Based on our review, the family court correctly determined that Rock’s reliance on CR 60.02(b), citing newly discovered evidence, fails because it was not brought within a year of the judgment ordering Rock to pay child support, which was entered July 30, 2021. Additionally, the family court also correctly held that Rock’s evidence regarding Patterson’s inheritance was not new evidence as contemplated in the rule. “Newly discovered evidence is evidence that could not have been obtained at the time of trial through the exercise of reasonable diligence.” *Commonwealth v. Harris*, 250 S.W.3d 637, 642 (Ky. 2008). Patterson testified at the hearing in 2021 that she was living on income from an investment account, and Rock also testified that he knew she lived on an inheritance. The underlying details of the account could have been discovered earlier through cross-examination at the previous hearings or through diligent discovery. Thus, relief was not available under CR 60.02(b).

CR 60.02(d)

CR 60.02(d) relief pertains to “fraud affecting the proceedings, other than perjury or falsified evidence.” Rock argues that Patterson lied in 2021 about her income since she was withdrawing more from the investment account than the

amount she testified to. To constitute fraud affecting the proceedings, the movant must demonstrate fraud upon the court which attempted “to subvert the integrity of the court itself.” *Edwards v. Headcount Mgmt.*, 421 S.W.3d 403, 406 (Ky. 2014) (quoting *Goldsmith v. Fifth Third Bank*, 297 S.W.3d 898, 904 (Ky. App. 2009)). The fraud covered by CR 60.02(d) is generally “fraudulent conduct outside of the trial which is practiced upon the court, or upon the defeated party, in such a manner that he is prevented from appearing or presenting fully and fairly his side of the case.” *McMurry v. McMurry*, 957 S.W.2d 731, 733 (Ky. App. 1997) (quoting W. Bertelsman and K. Phillipps, *Kentucky Practice CR* 60.02, cmt. 6 (4th ed. 1984)). We agree with the family court that Rock failed to establish that Patterson committed fraud sufficient to set aside the family court’s orders entered in this case.

CR 60.02(e) and (f)

For the first time on appeal, Rock argues that he is also entitled to relief under CR 60.02(e) and (f), based upon extraordinary circumstances. These arguments were not presented to the court below for consideration. This Court has no authority to review issues not raised or decided by the court below. *Reg'l Jail Auth. v. Tackett*, 770 S.W.2d 225, 228 (Ky. 1989). And, CR 60.02 relief is not available where the purported errors could have been properly raised before this Court on direct appeal, which Rock failed to do. *Goldsmith*, 297 S.W.3d at 903.

Accordingly, this Court will not address these arguments on appeal, including any relief under CR 61.02, given the family court committed no palpable error in denying the CR 60.02 motion.

#### ATTORNEY FEES

Finally, Rock argues that based on the totality of circumstances regarding his CR 60.02 motion, the trial court's imposition of attorney fees upon a finding that his motion was frivolous was an abuse of the court's discretion. We disagree. An award of attorney fees is permitted in domestic relations cases. KRS 403.220. Rock filed the motion and pleadings at issue without any substantive legal basis, that were stricken by the family court. On its face, the motion was not well grounded in fact or warranted by existing law, especially CR 60.02. *See* CR 11. We agree with the family court that the pleadings were frivolous. Under Kentucky law, the amount of an award of attorney fees is subject to the discretion of the court. *Gentry v. Gentry*, 798 S.W.2d 928, 938 (Ky. 1990). Based on our review of the record and given that Rock failed to avail himself of a timely appeal of previous final orders, we find no abuse of discretion in awarding attorney fees in this case.

#### CONCLUSION

As duly noted in this Opinion, Rock had several opportunities to properly appeal final orders that arguably may have addressed the alleged ~~child~~.

support deficiency owed by Patterson and failed to do so. Whether this was at Rock's direction or a result of prior attorneys' malpractice is not an issue before this Court nor will we speculate regarding same. Rock was not entitled to relief below under CR 60.02 and we affirm the family court's ruling thereon.

However, based on our thorough review of the record below, the family court has not made a determination on whether there exists an alleged child support deficiency owed by Patterson to Rock. As noted, the family court declined to offset any alleged child support owed by Patterson against the child support owed by Rock that was established by the evidence. Similarly, nothing in the record indicates that Rock waived the alleged obligation for child support owed by Patterson or that the family court had "relieved" Patterson of any child support obligations as alleged by Rock in his brief to this Court. Accordingly, nothing in this Opinion should be construed that this Court has addressed the merits of any claims regarding alleged child support owed by Patterson. Nor does this Opinion preclude a proper adjudication of this issue.

In Kentucky, a family court has no authority to forgive a child support arrearage. *Lichtenstein v. Barbanel*, 322 S.W.3d 27, 33 (Ky. 2010). In *Sallee v. Sallee*, 468 S.W.3d 356 (Ky. App. 2015), this Court addressed child support arrearages as follows:

It is well-established that "each installment of child support becomes a lump sum judgment, unchangeable by

the trial court when it becomes due and is unpaid.” *Raymer v. Raymer*, 752 S.W.2d 313, 314 (Ky. App. 1988) (quoting *Stewart v. Raikes*, 627 S.W.2d 586, 589 (Ky. 1982)). In *Raymer*, this Court held that satisfaction and payment of child support are both affirmative defenses under Kentucky Rules of Civil Procedure (CR) 8.03, and pointed out that “[t]he party holding the affirmative of an issue must produce the evidence to prove it.” *Raymer*, 752 S.W.2d at 314 (quoting CR 43.01).

*Id.* at 357-58.

Patterson alludes to a possible agreement by the parties to relieve Patterson of any alleged child support deficiency. Parties can agree to modify custody and child support orders which a family court can recognize and reduce an arrearage. *Price v. Price*, 912 S.W.2d 44, 46 (Ky. 1995). However, the Supreme Court has stated explicit requirements for such a modification:

A court will enforce a private agreement between parents if it meets certain requirements. If the agreement is oral it must be proven with reasonable certainty and the court must find “that the agreement is fair and equitable under the circumstances.” *Whicker v. Whicker*, Ky. App., 711 S.W.2d 857, 859 (1986). Moreover, the agreement, once proven, will only be enforced if the “modification might reasonably have been granted, had a proper motion to modify been brought.”

*Id.* at 46. The record does not reflect that Patterson has moved to modify any prior court orders regarding her child support obligation.

If and when the family court renders a final order addressing any alleged child support arrearage owed by Patterson, including any agreements

reducing said arrearage, that order may be properly appealed to this Court by either party. In this appeal, Rock has failed to properly present the arrearage issue to this Court for review.

For the foregoing reasons, the judgment of the Marshall Family Court is affirmed.

ALL CONCUR.

BRIEFS FOR APPELLANT:

Chris Hendricks  
Murray, Kentucky

BRIEF FOR APPELLEE:

Alisha Kay Bobo  
Paducah, Kentucky

# **EXHIBIT: JUDICIAL FRAUD, CONSTITUTIONAL VIOLATIONS & FELONY CONCEALMENT**

**TO: Kentucky General Assembly (House of Representatives and Senate)**

**FROM: Ron David Rock**

**DATE: December 5, 2025**

**RE: Evidence of Judicial Fraud, Constitutional Violations, Violation of Clean Hands  
Doctrine, and Concealment of Felony Conduct**

This exhibit documents how Judge Stephanie J. Perlow manipulated judicial procedures, violated constitutional rights, excluded exculpatory evidence, rewarded a party in contempt, concealed felony-level conduct, and fabricated a court record—thereby committing fraud upon the court and depriving me of due process and equal protection of the laws.

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## **1. Violation of the clean hands doctrine**

- **Doctrine:** A core equitable principle holds that a court should not grant relief to a party who is acting in bad faith, in contempt, or in violation of the law regarding the subject of the litigation.
- **Application to my case:** When Amy Patterson came to court in 2020–2021, she was in active violation of two existing orders: (1) the 2011 custody order (by withholding the child), and (2) the 2011 child-support order (with a growing arrearage later documented at approximately 18,000 dollars).
- **Required consequence:** Under Kentucky equitable principles, a party in contempt and bad faith should not receive equitable relief until the contempt is resolved. The court should have adjudicated her contempt and arrears first, before entertaining her request to change custody.
- **What Judge Perlow did instead:** Judge Perlow declined to hold Patterson in contempt for withholding visitation, declined to adjudicate her arrears, and nevertheless granted Patterson the primary residential custody she requested.

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## **2. Fabrication of child support orders in violation of statutory law**

- **Kentucky law (KRS 403.212):** Requires verified income information and a completed child-support worksheet as the basis for any support calculation; testimony alone is not sufficient.
- **The fabrication:** Judge Perlow set child support based solely on unsupported testimony: she attributed 45,000 dollars per year in income to me based on a one-time stock withdrawal while I was unemployed, and she accepted Patterson's claim of 1,600 dollars per month from an "investment account" without requiring corroborating financial documentation.
- **Statutory violation:** This disregard of the verification requirements in KRS 403.212 produced child-support orders that are inconsistent with Kentucky's statutory scheme and case law recognizing that vested arrears become unchangeable lump-sum judgments.

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## **3. Exclusion of exculpatory evidence and reliance on unconstitutional evidence**

- **Excluded exculpatory evidence:** On the day of the relevant hearing, I presented a clean, court-admissible multi-panel drug test that directly refuted Patterson's "safety" allegations. The court refused to credit or meaningfully consider it.
- **Unconstitutional "evidence":** Judge Perlow had previously ordered a drug test without a proper evidentiary hearing, without probable cause, and without the procedural protections normally associated with Fourth Amendment-compliant searches. The positive result from that order was then used as evidence to modify custody in the July 2021 order.
- **Resulting violation:** The court effectively relied on tainted and constitutionally suspect "evidence," while disregarding exculpatory evidence that undermined the basis for the earlier test, and then used that tainted record to justify a custody change.

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## 4. Concealment of felony-level conduct and obstruction of enforcement

- **Felony context:** Persistent nonpayment of court-ordered child support at the level documented here meets the criteria for flagrant non-support under KRS 530.050, a Class D felony.
- **Judicial cover-up:** Rather than making findings on arrears and referring potential felony conduct for enforcement, Judge Perlow repeatedly refused to adjudicate the arrearage, then treated the issue as “addressed” when it had never been reduced to judgment. This had the practical effect of erasing approximately 18,000 dollars in arrears without lawful authority.
- **Systemic obstruction:** By refusing to adjudicate the arrears and by declining to enter a clear judgment, the court insulated probable felony-level conduct from scrutiny and prevented the normal enforcement apparatus (county attorney, Attorney General’s child-support division) from acting on an accurate record.

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## 5. Procedural fraud and fabrication of the record

- **Combining incompatible proceedings:** Judge Perlow heard my contempt motion against Patterson (for nonpayment and interference with custody) in the same sequence where Patterson sought a change in custody. The contempt issues were never fully adjudicated, and the focus shifted to awarding Patterson primary custody rather than enforcing her existing obligations.
- **Mischaracterizing the evidence:** The Court of Appeals has noted that Patterson’s claim of an “agreement” to replace support with college-fund deposits, and of a waiver of arrears, was not supported by the hearing record: neither party testified that those deposits were “in lieu of” support, and the motion for contempt on arrears was never withdrawn. Nevertheless, the family court treated the arrears as an issue already resolved and declined to enter judgment.
- **Blocking later correction:** When new counsel moved for judgment on past-due support and later for CR 60.02 relief based on complete account statements, the family court denied relief as already “addressed” or time-barred, even though the Court of Appeals has now explicitly stated the arrears have never been adjudicated and cannot be forgiven under Kentucky law.

## 6. Deliberate obstruction of appellate review

- **Delay tactic:** Judge Perlow held my CR 59.05 motion under advisement for months, issuing an order in December 2021 that left the arrears substantively unadjudicated while running out the clock on a clean appeal of the July 30, 2021 order.
- **Entrapment into a dead-end remedy:** When I later obtained Patterson's financial records and presented them, the court directed that I proceed under CR 60.02, then struck the evidence and ultimately sanctioned me 1,000 dollars for pursuing the very relief route it had required.
- **Pattern:** These steps produced a record in which no timely appeal could reach the arrears issue, while later efforts were dismissed as untimely or improper—creating a closed procedural loop designed to prevent meaningful review.

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## Composite violation: subversion of the judicial process

Taken together, these actions show a coordinated pattern of judicial misconduct:

- Fabricating support orders in disregard of statutory verification requirements.
- Excluding exculpatory evidence and relying on constitutionally tainted "evidence" to alter custody.
- Ignoring and refusing to adjudicate contempt and felony-level arrears while rewarding the violating party with favorable orders.
- Mischaracterizing the evidentiary record to avoid recognizing arrears, then using timing and procedure to block later correction and appellate review.

This is not an ordinary legal error. It is intentional, constructive fraud upon the court: manufacturing a false record, excluding the truth, and using unconstitutional means to achieve a predetermined, unlawful outcome. It represents a breakdown of the judicial function and a systemic deprivation of constitutional rights under color of state law.

Sincerely,



Ron Davod Rock

December 5, 2025

## **EXHIBIT: EVIDENCE OF JUDICIAL PATTERN – MOTTER v. MOTTER REVERSAL & ROCK v. PATTERSON DOCUMENTATION**

**DATE: December 5, 2025**

**TO: Kentucky General Assembly (House of Representatives and Senate)**

**FROM: Ron David Rock**

**RE: Pattern of Jurisdictional Overreach & Statutory Violations by Judge Stephanie J. Perlow – Documented by Kentucky Court of Appeals**

**CASE: Lance Richard Motter v. Victoria Cruse Motter, Kentucky Court of Appeals No. 2024-CA-1369-MR (2025).**

### **HOLDING**

The Kentucky Court of Appeals REVERSED the Marshall Family Court (Judge Stephanie J. Perlow) for lack of personal jurisdiction over a non-resident spouse in a marital property division case.

### **SUMMARY OF THE APPELLATE COURT'S FINDINGS**

1. **Statutory Error:** Judge Perlow erroneously relied on the general long-arm statute (KRS 454.210) instead of the specific family-law long-arm statute (KRS 454.220) that governs matrimonial actions.
2. **Violation of Time Limit:** KRS 454.220 imposes a strict one-year limitation period from the date the non-resident spouse was last present in Kentucky for a court to acquire personal jurisdiction.
3. **Jurisdictional Defect:** Because the appellant left Kentucky in April 2022 and the divorce petition was not filed until September 24, 2023 (more than one year later), the trial court lacked personal jurisdiction to divide marital property.
4. **Orders Void for Lack of Jurisdiction:** The Court concluded that the family court's property-division orders were void for lack of personal jurisdiction and must be reversed.

### **KEY LANGUAGE (PARAPHRASED)**

- On the Proper Statute: The opinion emphasizes that where both a general long-arm statute (KRS 454.210) and a specific one (KRS 454.220) exist, KRS 454.220 and its one-year limitation period apply in matrimonial property cases.
- On Statutory Interpretation: The Court relies on the rule that when a conflict appears between two statutes, the specific provision takes precedence over the general, citing *Commonwealth v. Phon*, 17 S.W.3d 106 (Ky. 2000).
- On the One-Year Limit: The Court notes the husband left Kentucky in April 2022, the action was filed in September 2023 (more than one year later), and that under KRS 454.220 the trial court did not have personal jurisdiction to divide the marital property.

## SIGNIFICANCE TO DOJ REQUEST

This reversal demonstrates that Judge Stephanie J. Perlow's disregard for jurisdictional limits is not confined to child custody or support proceedings (as discussed in *Rock v. Patterson*, No. 2024-CA-0384-MR) but extends to marital-property division, affecting a wider class of litigants and confirming a pattern of acting outside lawful authority.

## KEY FACTS ESTABLISHING THE PATTERN

Case	Subject Matter	Jurisdiction / Legal Defect	Appellate Result / Effect
Rock v. Patterson, No. 2024-CA-0384-MR	Child custody & support	Family court never adjudicated ~\$18,000 in vested arrears; appellate court reiterates that Kentucky courts have no authority to forgive child-support arrearages, citing	Affirmed denial of CR 60.02, but expressly states arrears remain unadjudicated and cannot be forgiven under Kentucky law.

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*Lichtenstein v.  
Barbanel and  
Raymer v. Raymer.*

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Motter v. Motter, No. 2024-CA-1369-MR	Marital-property division	Misapplication of long-arm statutes; violation of one-year filing deadline in KRS 454.220; lack of personal jurisdiction over non-resident spouses.	Reversed; property-division orders declared void for lack of personal jurisdiction.
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Pattern Characteristics:

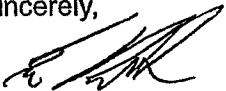
- Recurring Jurisdictional and Authority Defects: One appellate decision (*Rock*) confirming the court cannot forgive arrears and never adjudicated them; another (*Motter*) reversing Judge Perlow outright for lack of personal jurisdiction in property division.
- Statutory Misapplication: Failure to apply correct statutory frameworks in both arrears enforcement (*Rock*) and long-arm jurisdiction (*Motter*).
- Impact on Multiple Litigant Classes: Affects child-support, custody, and marital-property rights—not a single family or case.
- Institutional Failure to Correct: Despite these appellate decisions, the Administrative Office of the Courts continues to fund Judge Perlow's defense with public money through recurring contracts with Dentons Bingham Greenebaum LLP.

**FEDERAL INTERESTS IMPLICATED**

- 42 U.S.C. § 1983: Deprivation of due process and property rights through void or jurisdictionally defective judicial orders issued under color of state law.

- **Pattern or Practice:** Two recent Kentucky Court of Appeals decisions involving the same judge—one affirmation with explicit recognition of unlawful treatment of vested arrears, and one reversal for lack of personal jurisdiction—support a reasonable belief that there is a pattern of unconstitutional conduct in that courtroom.
- **Misuse of Federal Funds:** Kentucky receives federal Title IV-D child-support enforcement funding and federal court-improvement or access-to-justice grants; a judicial pattern of void or unenforced orders raises serious questions about compliance with federal program requirements.
- **Institutional Obstruction:** The AOC's ongoing funding of Judge Perlow's defense, despite these appellate decisions, demonstrates a system designed to protect judicial officers from accountability rather than ensure compliance with constitutional and statutory limits.

Sincerely,



Ron Davod Rock

December 5, 2025

# EXHIBIT POLICY

**Case:** Liability of the Administrative Office of the Courts (AOC) **Source:** Informational Bulletin No. 255, Legislative Research Commission, December 2018

## Exhibit A – Judiciary Committee Report

Pages 53–59, IB255 Pg 53

"The committee received testimony examining certain operations, internal controls, and policies of the Administrative Office of the Courts (AOC), including remedial recommendations. The Chief Justice and the Director of the AOC discussed the agency's financial practices, contracting procedures, and oversight responsibilities. Committee members raised concerns about the adequacy of internal controls and recommended that remedial measures be implemented to strengthen accountability."

**Relevance:** This shows the Kentucky Legislature formally reviewed the AOC's operations and found weaknesses in its internal controls. It establishes that the AOC's financial management practices were already questioned by lawmakers.

## Exhibit B – Appropriations and Revenue Committee Report

Pages 7–23, IB255 Pg 12

"Necessary government expenses for guardian ad litem totaled \$14.1 million in FY 2018... included in the base budget for FY 2019 and FY 2020."

**Relevance:** Guardian ad litem costs are directly tied to court functions. Since the AOC administers these, this excerpt proves the AOC is financially responsible for custody-related expenditures.

## Exhibit C – State Government Committee Report

Pages 83–99, IB255 Pg 95

"An audit finding recommended that the General Assembly require an annual independent audit of the Administrative Office of the Courts."

**Relevance:** This is direct evidence from the Auditor of Public Accounts that the AOC requires ongoing audits. It proves lawmakers already identified oversight failures in AOC's financial practices.

## **Exhibit D – Child Welfare Oversight and Advisory Committee Report**

**Pages 151–159, IB255 Pg 152**

"Representatives of the Administrative Office of the Courts testified on how the judicial branch is implementing the provisions of House Bill 1... including training for judges, clerks, and foster care review boards."

**Relevance:** This shows the AOC's operational and financial role in foster care oversight and custody proceedings. It ties their budgetary responsibility directly to child welfare outcomes.

## **Exhibit E – Capital Projects and Bond Oversight Committee Report**

**Pages 143–150, IB255 Pg 144**

"The Administrative Office of the Courts... submitted annual reports, pursuant to KRS 45.760(9) and quarterly capital projects status reports, pursuant to KRS 26A.168(1)."

**Relevance:** Establishes that the AOC is statutorily required to report capital project spending to the legislature. This ties them directly to financial accountability for courthouse construction and maintenance.

## **Conclusion**

These exhibits collectively demonstrate:

1. The AOC has statutory authority over funds (Exhibit E).
2. The AOC has documented internal control failures (Exhibit A, Exhibit C).
3. The AOC is financially responsible for custody and foster care expenditures (Exhibit B, Exhibit D).

**Together, these records establish liability of the Administrative Office of the Courts for mismanagement of funds and oversight failure**

**PERSONAL SERVICE CONTRACT AMENDMENT LIST - JUNE 2025**

AGENCY/ VENDOR	EFFECTIVE DATES	CONTRACT TYPE	CONTRACT AMOUNT	AMENDMENT AMOUNT/ AMENDMENT DESCRIPTION	CONTRACT DESCRIPTION
<b>ADMINISTRATIVE OFFICE OF THE COURTS</b>					
<b>1. 2400005217</b> Lake Cumberland Mental Health Mental Retardation Board d/b/a The Adanta Group 130 Southern School Road Somerset, KY 42501	July 01, 2024 - June 30, 2026	Treatment Services	\$191,200.00	Increase by \$44,800.00; General Funds; Provide additional funds.	Provide funds for substance abuse and mental health assessment/treatment services to participants referred by AOC Specialty Courts.
<b>2. 2400005218</b> Communicare, Inc. 107 Cranes Roost Court Elizabethtown, KY 42701	July 01, 2024 - June 30, 2026	Treatment Services	\$118,300.00	Increase by \$5,700.00; General Funds; Provide additional funds.	Provide funds for substance abuse and mental health assessment/treatment services to participants referred by AOC Specialty Courts.
<b>3. 2400005222</b> Kentucky River Community Care, Inc. 115 Rockwood Lane Hazard, KY 41701	July 01, 2024 - June 30, 2026	Treatment Services	\$138,200.00	Increase by \$13,800.00; General Funds; Provide additional funds.	Provide funds for substance abuse and mental health assessment/treatment services to participants referred by AOC Specialty Courts.
<b>4. 2400005228</b> Green River Regional MHMR Board, Inc. P. O. Box 1637 Owensboro, KY 42302-1637	July 01, 2024 - June 30, 2026	Treatment Services	\$146,600.00	Increase by \$5,400.00; General Funds; Provide additional funds.	Provide funds for substance abuse and mental health assessment/treatment services to participants referred by AOC Specialty Courts.
<b>5. 2400005229</b> Seven Counties Services, Inc. 10401 Linn Station Road, Suite 100 Louisville, KY 40223	July 01, 2024 - June 30, 2026	Treatment Services	\$48,000.00	Increase by \$2,000.00; General Funds; Provide additional funds.	Provide funds for substance abuse and mental health assessment/treatment services to participants referred by AOC Specialty Courts.
<b>6. 2400005230</b> Transitions, Inc. 535 West Pike Street Covington, KY 41011	July 01, 2024 - June 30, 2026	Treatment Services	\$35,200.00	Increase by \$24,000.00; General Funds; Provide additional funds.	Provide funds for substance abuse and mental health assessment/treatment services to participants referred by AOC Specialty Courts.
<b>7. 2500001728</b> Dentons Bingham Greenebaum, LLP 101 South Fifth Street Louisville, KY 40202	December 30, 2024 - June 30, 2026	Legal	\$20,000.00	Increase by \$10,000.00; General Funds; \$125 per hour; Provide additional funds.	Provide funds to review all documentation relating to Ron D. Rock v. Judge Stephanie Perlow, et. al., WDKY Case #5-24-cv-181 and provide representation for Judge Stephanie Perlow and AOC, throughout all related proceedings until the matter has been resolved.

**MEMBERS:**

R. MICHAEL SULLIVAN, CHAIR  
OWENSBORO

JUDGE JEFF S. TAYLOR  
OWENSBORO

JUDGE EDDY COLEMAN  
PIKEVILLE

JUDGE ELIZABETH CHANDLER  
CARROLTON

DR. JOE E. ELLIS  
BENTON

JANET LIVELY McCUALEY  
LOUISVILLE

**ALTERNATES:**

CARROLL M. "TRIP" REDFORD, III  
LEXINGTON

JUDGE GLENN E. ACREE  
LEXINGTON

JUDGE MITCH PERRY  
LOUISVILLE

JUDGE AMY ANDERSON  
CAMPBELLSVILLE

EXECUTIVE SECRETARY  
LAURA H. HENDRIX

COMMONWEALTH OF KENTUCKY  
**JUDICIAL CONDUCT COMMISSION**  
P.O. Box 4266  
FRANKFORT, KENTUCKY 40604-4266  
PHONE 502-564-1231  
JUDICIALCONDUCTCOMMISSION@KYCOURTS.NET

**PERSONAL & CONFIDENTIAL**

August 21, 2024

Mr. Ron David Rock  
1450 Bluebird Lane  
Paducah, KY 42003

RE: Case Number 2024-112

Dear Mr. Rock:

This is to acknowledge receipt of your complaint against Judge Stephanie J. Perlow. Commission staff has forwarded copies to the members of the Commission for their consideration. The Commission, by order of the Kentucky Supreme Court, must keep this matter confidential.

You will receive written notification once the Commission has concluded its consideration of this matter.

Sincerely,



Ashlee Daniel  
Executive Assistant

MEMBERS:

R. MICHAEL SULLIVAN, CHAIR  
OWENSBORO

JUDGE JEFF S. TAYLOR  
OWENSBORO

JUDGE EDDY COLEMAN  
PIKEVILLE

JUDGE ELIZABETH CHANDLER  
CARROLLTON

DR. JOE E. ELLIS  
BENTON

JANET LIVELY McCUALEY  
LOUISVILLE

EXHIBIT Q / EXHIBIT 1

ALTERNATES:

CARROLL M. "TRIP" REDFORD, III  
LEXINGTON

JUDGE GLENN E. ACREE  
LEXINGTON

JUDGE MITCH PERRY  
LOUISVILLE

JUDGE AMY S. ANDERSON  
CAMPBELLSBURG

EXECUTIVE SECRETARY  
MS. LAURA H. HENDRIX

COMMONWEALTH OF KENTUCKY  
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P.O. Box 4266  
FRANKFORT, KENTUCKY 40604-4266  
PHONE 502-564-1231  
JUDICIALCONDUCTCOMMISSION@KYCOURTS.NET

PERSONAL AND CONFIDENTIAL

September 16, 2024

Ron David Rock  
1450 Bluebird Lane  
Paducah, KY 42003

RE: Case Number: 2024-212

Dear Mr. Rock:

At its last meeting, the Judicial Conduct Commission considered the complaint you filed against Judge Stephanie J. Perlow.

The Judicial Conduct Commission is governed by the Rules of the Kentucky Supreme Court. Those rules provide that the Commission primarily has jurisdiction to sanction judges of the Court of Justice who are found guilty of acts of misconduct or who violate the Code of Judicial Conduct.

After carefully reviewing the information that you submitted, the Commission determined to take no action on your complaint.

Sincerely,

*Executive Secretary*

Ms. Laura H. Hendrix  
Executive Secretary

JAS:and