

## App.101a

made on your case, unless otherwise ordered by the Court.

### **Exceptions:**

1. The previous divorce waiting period in the State of Pennsylvania before December of 2016 was 2 years. After this date, the waiting period changed to only one year. In our case, the divorce was filed in June of 2016 so the duration will be 3 years and 9 months as of March 2020. Our waiting period has exceeded the maximum two year amount. Moreover, the spousal support should only continue for 2 years. My case has also surpassed the maximum limit, in that it has been 3 years and 9 months since filing.

2. Under Pennsylvania State Law, the act of child abuse is grounds for not granting Spousal Support. Wassen, therefore, is not entitled to Spousal Support because of her abuse of our child, I.G.. It is well documented that Wassen committed child abuse in the court order from October 8th, 2018, in which the Judge denied her request to remove the child abuse from her criminal record.

3. Under Pennsylvania State Law, adultery is grounds for not granting spousal support and Wassen committed adultery on a regular basis. Moreover, this matter was explained during the Master Hearing on August 8th, 2019. The Master even brought their personal law book which states that under Pennsylvania State Law Number 14, adultery is considered a factor in divorce proceedings.

4. I was the sole contributor to family expenses (homemaker) which is considered as a factor in awarding Spousal Support in this state. Moreover, she has a

App.102a

high business income and continually refused to deposit her business income into one bank account with me during our marriage.

5. Wassen inherited millions of dollars from her father who died on December 19th, 2018. He owned 2 businesses that brought in high incomes. One was the Liquor Merchant, which was making \$50,000.00/week for 14 years. It was mentioned in her attorney's counter claim on February 6th, 2020 (copies of the business were submitted to FLM). The second business was Orient Communications Inc. An inheritance is a factor in awarding Spousal Support.

6. Wassen is unwilling to work and did not try to apply for any jobs. This is because she already has a high income from her business and she wants easy money from Spousal Support. Moreover, the custody of I.G. is 50/50. I am working full time and taking care of I.G. 50% of the time while she is not doing so.

7. The length of the marriage is short. Our marriage period was only 6 years, but the actual period is less than 3 years because of the following facts:

- a. Wassen lived separately in a different room beginning with the birth of I.G. in July 2015 and until June 2016. That is equivalent to 11 months of living apart and must be subtracted from the 6 years marriage period.
- b. Wassen went to Michigan for 4 to 6 months each year and this should also be subtracted from the 6 years of marriage. Therefore, the actual period of marriage is less than 3 years. This was explained on August 8th, 2019, during the Master Hearing.

8. I am respectively asking to terminate Spousal Support.

**Response to Relations Hearing Officer Recommendation:**

1. "Spousal Support is separate and distinct from Alimony pendente lite." The response is:

a. The Spousal Support is the same as Alimony pendente lite. I have been paying Spousal Support starting in June 2016 (the time of separation). This is the same time of the divorce filing. She also has a business income and an inheritance and she is not disclosing any of it.

2. "The duration of the party's marriage is a fact to be considered in the duration of Spousal Support Awarding." The response is as follows:

a. The duration of our marriage is short. Our marriage period was 6 years, but the actual period of marriage is less than 3 years. I explained this to the Master during the Master Hearing on August 8th, 2019. Moreover, Wassen is not disclosing her business income and inheritance which are factors that decide Spousal Support awarding. She is also not trying to find a job and she wants easy money.

3. "While the parties divorce has been pending since 2016, the defendant (who is the plaintiff in the divorce case) did not pursue the divorce case actively until November 2018 when he filed an amended complaint in divorce." The response is as follows:

- a. I have filed for divorce since June 2016 and I insisted that my previous Attorney finalize the divorce as soon as possible, even before the end of the first year of separation. However, Wassen was refusing to divorce and she wanted to attend marriage counseling. While I attended the counseling, Wassen decided not to go to the counseling she requested. This was done in an effort, made by Wassen, to delay the proceedings with her attorney. I, then, refused to continue the marriage because of the purposeful delay of court proceedings in addition to the fact that she committed adultery.
- b. I made many phone calls and sent numerous emails to my attorney to finalize the divorce. However, Wassen was intentionally delaying the proceedings with her attorney. Also, my previous attorney was also deliberately delaying court proceedings until I insisted that he file the divorce complaint. He did so on October 1st, 2018 but he submitted it with the wrong Plaintiff/Defendant Title. This occurred despite the fact that he was the one who filed the divorce motion. I discovered this when I called the court office and they informed me that he filed the wrong Plaintiff/ Defendant Title. I then contacted him to correct his mistake, where he then proceeded to file the motion under the wrong code of divorce. I, again, called the court office and I was informed a second time that my attorney filed the Divorce Complaint with the wrong code. I then contacted my attorney once

again to correct this problem. That is why an amended complaint wasn't properly filed until November 2018.

- c. I have emails to prove that I was actively pursuing the divorce to be finalized as soon as possible. Wassen was the one delaying the proceedings and the emails are attached.

4. "The parties have been engaged in highly antagonistic divorce litigations since early 2019, with multiple contempt filings against the defendant." The response is:

- a. The reason for multiple contempt filings against me is because Wassen was not disclosing her business income and bank accounts. I informed my attorney that I would sign the release when she disclosed her business income, bank accounts, and all other documents required from her. However, everytime I signed the disclosure documents, she would not sign the release. Her attorney submitted a contempt against me while my attorney refused to submit my contempt against her. This is why I ended up with multiple contempt filings against me and she had none against her until now. Furthermore, she is not disclosing her business income from "Julians Flowers" in addition to the value of this business, along with other documents. This is unlawful as it is exhibiting a double standard. I am not going to terminate my inquiries on her business income and its value as it is relevant to our divorce proceedings. She must disclose all of her assets before the divorce can be finalized.

It is obvious that my attorney had an arrangement with her attorney so that I would have multiple contempt filings against me while she would have none. This is apparent from the court documents.

5. "The defendant has not been paying spousal support for longer than the parties marriage." The response is as follows:

- a. The Spousal Support duration is not equal to the duration of marriage. According to old Pennsylvania State Law, Spousal Support is only for a period of 2 years so that the spouse can find a job. At this time, it has surpassed the 2 year period and Wassen has decided not to seek any jobs. This is due to the fact that she has a business.
- b. Following the law changes in December 2016, the divorce waiting period is only one year. This, in addition to her business income and inheritance, should be considered in the awarding of spousal and child support. It is unjust to have me pay for Spousal Support and Child Support for this lengthy duration while she is taking advantage of the situation. She is not putting any effort in finding a job and also neglecting I.G., while I am working full time and taking care of I.G. 50% of the time.

6. "There is no evidence in the record showing that the duty to pay support has been obviated or negated in any way." The response is:

- a. I have mentioned in previous Master Hearings that occurred in July 2016, February 2017

and August 2019—while in front of the Master—that she has a business income and that she must work. There must be a termination of Spousal Support and a recalculation of the previous Spousal Support and Child Support. I should be refunded for the Spousal Support and Child Support that I have paid with 10% interest.

- b. The last 2 lines of the recommendations is, “The defendant reference to plaintiff having a business is deemed wholly unsupported by the stipulated record and the documents he submitted are dated from 2010.” The response is as follows:
- i. The 3 checks were for loan payments made by Wassen to the order of the Julians Flowers Business with the amount of \$2000.00 per month. These were paid by checks from Charter One Bank (Citizens Bank) for the months of February, March, and April in the year 2010. These checks are outstanding proof and strong evidence that Wassen is the owner of Julians Flowers Inc. The order of the Master, on August 8th, 2019, states that Wassen must disclose her business income and is attached. The records from the Charter One Bank account and Citizens Bank account are not acceptable. They are false because there are no specific transactions on these bank statements. They are not specific as a whole and only mention item numbers, which is not acceptable. She must

disclose her business income and value. In addition, she could also be making payments from another bank that has not been disclosed.

- ii. The Fifth-Third Bank stamps on the 3 checks is proof that there are relations between this bank and the Julians Flowers business. It is also strong evidence that Wassen is the owner of this business. She must disclose this business.
- iii. The fact that the 3 checks submitted are dated back to 2010 does not mean that they are old. It means that she took out a large loan and is making payments of \$2000 a month for the next 20-30 years. The estimate of this loan for the Julians Flowers business could be in the range Of \$300,000 to \$ 400,000, which means that it is a big business with a high income.
- iv. Wassen's previous attorney Melanie Hoover admitted on December 18th, 2018, during the preliminary conference and in front of the Family Law Master, that Wassen has a business. This was recorded by the Master.
- v. Wassen herself confessed to me that she paid \$150,000 in down payments for the Julians Flowers business.
- vi. Before the wedding, Wassen's mother told me that Wassen's business makes more money than my income. From the

App.109a

first day of our marriage, I asked Wassen many times to deposit her income into one bank account with my income. She refused to do so on every occasion. She kept her business income in a separate account. She even asked for a prenup before we got married. Furthermore, she did not contribute to any family expenses as I was the only person paying for family expenses.

- vii. Every business must have a bank account and a credit card and she has not disclosed any of this information.
- viii. One condition to grant a loan for a business is to have assets and good credit. She is not disclosing her assets. It is not fair nor just that I have been honest and disclosed everything while she has not disclosed her business income, its value, or her inheritance.
- ix. Both of my attorneys refused to file contempt against Wassen for not disclosing her business income.

**FINAL ORDER OF COURT, COURT OF  
COMMON PLEAS OF MCKEAN COUNTY,  
PENNSYLVANIA DOMESTIC RELATIONS  
SECTION (SIGNED SEPTEMBER 5, 2016;  
FILED SEPTEMBER 8, 2016)**

---

IN THE COURT OF COMMON PLEAS OF  
MCKEAN COUNTY, PENNSYLVANIA  
DOMESTIC RELATIONS SECTION

---

WASSEN GORO,

*Plaintiff,*

v.

JOSEPH GORO,

*Defendant.*

---

Order Number: DR99-16

PACSES Case Number: 900115973

Docket Number: DR99-16

---

**ORDER OF COURT-ALLOCATED  
FINAL INTERIM MODIFIED**

AND NOW, THIS 5th DAY OF September 2016,  
based upon the Court's determination that the Payee's  
monthly net income is \$0.00 and the Payor's monthly  
net income is \$13,431.82, it is hereby ordered that the  
Payor pay to the Pennsylvania State Collection and  
Disbursement Unit FIVE THOUSAND DOLLARS

App.111a

AND ZERO CENTS Dollars (\$5,000.00) a month payable MONTHLY as follows: first payment due IMMEDIATELY. The effective date of the order is 06/07/16.

Arrears set at \$13,602.15 as of AUGUST 16, 2016 are due in full IMMEDIATELY. All terms of this Order are subject to collection and/or enforcement by contempt proceedings, credit bureau reporting, tax refund offset certification, passport denial certification, driver's/professional/recreational license revocation, interception of lottery winnings, and the freeze and seize of financial assets. These enforcement/collection mechanisms will not be initiated as long as obligor does not owe overdue support. Failure to make each payment on time and in full will cause all arrears to become subject to immediate collection by all the means listed above.

For the Support of:

Name

I.G.

WASSEN GORO

Birth Date

XX/XX/2015

08/26/71

The defendant owes total of \$5,000.00 per month payable MONTHLY \$4,877.00 for current support and \$123.00 for arrears. The defendant must also pay fees/costs as indicated below. This order is allocated and monies are to be applied as follows:

Frequency Codes:

App.112a

1=One Time

M=Monthly

Payment Amount/ Frequency

\$ 1,355.00 / M

\$ 3,522.00 / M

Debt Type Description

CS/MED/IV-D            I.G.

SS/MED/IV-D            WASSEN GORO

Said money to be turned over by the Pa SCDU for distribution and disbursement in accordance with Rule 1910.17(d).

Payments must be made by check or money order. All checks and money orders must be made payable to Pa SCDU and mailed to:

Pa SCDU  
P.O. Box 69110  
Harrisburg, Pa 17106-9110

Payments must include the defendant's PACSES Member Number or Social Security Number in order to be processed, Do not send cash by mail.

The monthly support obligation includes cash medical support in the amount of \$250 annually for unreimbursed medical expenses incurred for each child and/or spouse as ordered herein. Unreimbursed medical expenses of the obligee or children that exceed \$250 annually shall be allocated between the parties. The party seeking allocation of unreimbursed medical expenses must provide documentation of expenses to the other party no later than March 31st of the year following the calendar year in which the final

App.113a

medical bill to be allocated was received. The unreimbursed medical expenses are to be paid as follows: 80.00% by defendant and 20.00% by plaintiff.

Defendant is ordered to provide medical insurance coverage.

Within thirty (30) days after the entry of this order, the  Plaintiff  Defendant shall submit to the other party and to the Domestic Relations Section written proof that medical insurance coverage has been obtained or that application for coverage has been made. Proof of coverage shall consist, at a minimum, of : 1) the name of the health care coverage provider(s); 2) any applicable identification numbers; 3) any cards evidencing coverage; 4) the address to which claims should be made; 5) a description of any restrictions on usage, such as prior approval for hospital admissions, and the manner of obtaining approval; 6) a copy of the benefit booklet or coverage contract; 7) a description of all deductibles and co-payments; and 8) five copies of any claim forms.

Other Conditions:

PAYMENTS SHALL BE MADE BY THE DEFENDANT THROUGH INCOME ATTACHMENT TO HIS EMPLOYER. THE DEFENDANT IS, HOWEVER, RESPONSIBLE FOR MAKING PAYMENTS AS ORDERED UNTIL THE INCOME ATTACHMENT IS IN EFFECT AND CHILD & SPOUSAL SUPPORT ARE BEING DEDUCTED FROM HIS PAY CHECK.

PLEASE REFER TO THE MEMO AND WORKSHEETS ATTACHED TO THE SUPPORT REPORT AND RECOMMENDATIONS OF 7/25/16, WHICH HAVE BEEN ADOPTED AS AN ORDER OF COURT.

THE \$100 COURT COSTS HAVE ALREADY BEEN PAID FOR BY THE PLAINTIFF.

**Important Legal Notice**

PARTIES MUST WITHIN SEVEN DAYS INFORM THE DOMESTIC RELATIONS SECTION AND THE OTHER PARTIES, IN WRITING, OF ANY MATERIAL CHANGE IN CIRCUMSTANCES RELEVANT TO THE LEVEL OF SUPPORT OR THE ADMINISTRATION OF THE SUPPORT ORDER, INCLUDING, BUT NOT LIMITED TO, LOSS OR CHANGE OF INCOME OR EMPLOYMENT AND CHANGE OF PERSONAL ADDRESS OR CHANGE OF ADDRESS OF ANY CHILD RECEIVING SUPPORT. A PARTY WHO WILLFULLY FAILS TO REPORT A MATERIAL CHANGE IN CIRCUMSTANCES MAY BE ADJUDGED IN CONTEMPT OF COURT, AND MAY BE FINED OR IMPRISONED.

PENNSYLVANIA LAW PROVIDES THAT ALL SUPPORT ORDERS SHALL BE REVIEWED AT LEAST ONCE EVERY THREE (3) YEARS IF SUCH REVIEW IS REQUESTED BY ONE OF THE PARTIES. IF YOU WISH TO REQUEST A REVIEW AND ADJUSTMENT OF YOUR ORDER, YOU MUST DO THE FOLLOWING: CALL YOUR ATTORNEY. AN UNREPRESENTED PERSON WHO WANTS TO MODIFY (ADJUST) A SUPPORT ORDER SHOULD CONTACT THE DOMESTIC RELATIONS SECTION.

ALL CHARGING ORDERS FOR SPOUSAL SUPPORT AND ALIMONY PENDENTE LITE, INCLUDING UNALLOCATED ORDERS FOR CHILD AND SPOUSAL SUPPORT OR CHILD SUPPORT AND ALIMONY PENDENTE LITE, SHALL TERMINATE UPON DEATH OF THE PAYEE.

App.115a

A MANDATORY INCOME ATTACHMENT WILL ISSUE UNLESS THE DEFENDANT IS NOT IN ARREARS IN PAYMENT IN AN AMOUNT EQUAL TO OR GREATER THAN ONE MONTH'S SUPPORT OBLIGATION AND (1) THE COURT FINDS THAT THERE IS GOOD CAUSE NOT TO REQUIRE IMMEDIATE INCOME WITHHOLDING; OR (2) A WRITTEN AGREEMENT IS REACHED BETWEEN THE PARTIES WHICH PROVIDES FOR AN ALTERNATE ARRANGEMENT.

UNPAID ARREARAGE BALANCES MAY BE REPORTED TO CREDIT AGENCIES. ON AND AFTER THE DATE IT IS DUE, EACH UNPAID SUPPORT PAYMENT SHALL CONSTITUTE, BY OPERATION OF LAW, A JUDGMENT AGAINST YOU, AS WELL AS A LIEN AGAINST REAL PROPERTY.

IT IS FURTHER ORDERED that, upon payor's failure to comply with this order, payor may be arrested and brought before the Court for a Contempt hearing; payors wages, salary, commissions, and/or income may be attached in accordance with law; this Order will be increased without further hearing by 0% a month until all arrearages are paid in full. Payor is responsible for court costs and fees.

BY THE COURT:

/s/ Illegible

Judge

9/7/16

Date

**SUPPORT REPORT AND  
RECOMMENDATIONS  
(AUGUST 16, 2016)**

---

IN THE COURT OF COMMON PLEAS OF  
MCKEAN COUNTY, PENNSYLVANIA  
DOMESTIC RELATIONS SECTION

---

WASSEN GORO,

*Plaintiff,*

v.

JOSEPH GORO,

*Defendant.*

---

No. DR99-16

PACSES No. 900115973

---

(1) AND NOW, this 25th day of July, 2016, a hearing having been held before the Hearing Officer as a result of a complaint for Child and Spousal Support, filed by the Plaintiff on 06/07/16, at which the PLAINTIFF and DEFENDANT appeared, and (each) was represented by counsel, the following is found and recommended:

(2) McKean County (is) the proper venue in this case.

(3) CHILDREN/DOB for whom support is sought:  
I.G., DOB XX/XX/15

(4) There is a current support order for N/A effective N/A

(6) Unusual circumstances/expenses include: See attached pages

#### MEMORANDUM

Dr. Goro's gross base pay is \$230,677 a year, or \$8,872 every two weeks. However, his contract states that he will be entitled to a "quality incentive payment" each year of a maximum of \$10,000 a year, plus an additional "productivity incentive payment," both to be paid annually within sixty (60) days of the end of the year.

For the year 2014, those bonuses must have amounted to \$40,312.36, since according to his W-2, Dr. Goro made total gross income of \$270,989.36 in 2015. He apparently did receive such a bonus for 2015 that was paid in 2016, since his year-to-date earnings as of the end of June were \$124,208, higher than they would have been based solely on the doctor's base salary.

The Hearing Officer will therefore for the moment calculate the support in this case on Dr. Goro's base salary. However, Dr. Goro is directed to Supply, within twenty (20) days, a copy of 2 check, receipt, or other verification of what his bonus was for the year 2015 that was received in 2016. The support may then be reviewed without hearing unless a further hearing is requested by either party.

(7) Plaintiff's employer: None

(8) Defendant's employer: Bruce

Employer pay frequency: bi-weekly

Approximate gross income is \$419,223/month. He has a brother who lives with them and helps with fluid care.

(9) The evidence presented did not justify an (upward/ downward) deviation from the Child Support Guidelines, which would require that Plaintiff/Defendant pay \$4,877 a month: SEE ATTACHED WORKSHEETS.

Child Support \$1,355.17

Spouse Support \$3,522.25

(10) The Hearing Officer recommends that a support payment based on the guidelines (or deviation as set forth in #9) should be required as follows:

- ✓ \$4877 per month current support effective 6-7-16
- ✓ \$123 to be applied to arrears effective 8-12-16

Arrears in this case have/have not accrued and this amount (is/is not) equal to or greater than one month's support obligation.

- ✓ Payable through Domestic Relations
- ✓ Income attachment

PAYOR IS RESPONSME FOR PAYMENTS  
UNTIL THE INCOME ATTACHMENT IS IN EFFECT

PERIODIC REVIEW

[ . . . ]

## SUPPORT GUIDELINE CALCULATION

---

IN THE COURT OF COMMON PLEAS OF  
MCKEAN COUNTY, PENNSYLVANIA  
DOMESTIC RELATIONS SECTION

---

WASSEN GORO,

*Plaintiff,*

v.

JOSEPH GORO,

*Defendant.*

---

No. DR99-16

PACSES No. 900115973

---

CHILD SUPPORT	<u>Defendant</u>	<u>Plaintiff</u>
1. Number of Dependents in this Case	00	01
2. Total Gross Monthly Income	\$19,223.00	\$ 0.00
3. Less Monthly Deductions	\$ 5,791.18	\$ 0.00

App.120a

4. Monthly Net Income	\$ 13,431.82.	\$ 0.00
5. Combined Total Monthly	Net Income \$ 13,431.82	
7. Adjusted Monthly Net Income	\$ 13,431.82	
8. Basic Child Support Obligation	\$1,691.00	
9. Basic Child Support Less Monthly Social Security Benefit for Child/Children	\$1,691.00	
10. Net Income as Percentage of Combined Amount	100.00 %	0.00 %
11. Each Parent's Monthly Share of the Basic Child Support Obligation	\$ 1,691.00	\$ 0.00
12. Adjustment for Shared Custody	\$ -335.83	
14. Adjustment for Health	\$ 0.00	

App.121a

Insurance Premiums	
17. Total Obligation with Adjustments	\$ 1,355.17
18. Less Split Custody Counterclaim	\$ 0.00
19. Obligor's Support Obligation	\$ 1,355.17

**SUMMARY**

Date: JULY 26, 2016

Monthly obligation amount selected: \$4,877.00

payment frequency: MONTHLY

Obligation amount: \$ 4,877.00 Deviation reason:

3. OTHER RELEVANT FACTOR
4. OTHER RELEVANT FACTOR

**SPOUSAL SUPPORT GUIDELINE  
CALCULATION WITH DEPENDENT  
CHILDREN**

---

IN THE COURT OF COMMON PLEAS OF  
MCKEAN COUNTY, PENNSYLVANIA  
DOMESTIC RELATIONS SECTION

---

WASSEN GORO,

*Plaintiff,*

v.

JOSEPH GORO,

*Defendant.*

---

No. DR99-16

PACSES No. 900115973

---

1. Obligor's Monthly Net Income \$ 13,431.82
2. Less All Other Support \$ 0.00
3. Less Obligee's Monthly Net Income \$ 0.00
4. Difference \$ 13,431.82
5. Less Child Obligation for Current Action \$ 1,691.00
6. Income Available for Spousal Support \$ 11,740.82
7. Multiply by 30% 30%

App.123a

8. Amount of Basic Spousal Support \$3,522.25
9. Adjustment for Mortgage \$ 0.00
10. Total Monthly Spousal Support \$ 3,522.25

**SPOUSAL SUPPORT GUIDELINE  
CALCULATION WITHOUT DEPENDENT  
CHILDREN**

5. Multiply by 40% 40% .

**SUMMARY**

Date: JULY 26, 2016  
Monthly obligation amount selected: \$4,877.00  
payment frequency: MONTHLY  
Obligation amount: \$ 4,877.00 Deviation reason:

3. OTHER RELEVANT FACTOR
4. OTHER RELEVANT FACTOR

**SUBSTANTIAL OR SHARED PHYSICAL  
CUSTODY ADJUSTMENT CALCULATION**

---

IN THE COURT OF COMMON PLEAS OF  
MCKEAN COUNTY, PENNSYLVANIA  
DOMESTIC RELATIONS SECTION

---

WASSEN GORO,

*Plaintiff,*

v.

JOSEPH GORO,

*Defendant.*

---

No. DR99-16

PACSES No. 900115973

---

Obligor's Percent Share of Income: 100.00 %  
Percent of Time with Non-custodial Parent: 49.86%  
Percent of Time Considered Normal: -30%  
Difference-if 10% or Greater: 19.86%  
Obligor's Adjusted Percent Share: 80.14 %  
Basic Child Support Obligation: \$ 1,691.00  
Obligor's Adjusted Share of Basic Support Obligation: \$ 1,355.17  
Adjustment for income Equalization: \$ 0.00

App.125a

Adjustment for Shared Custody: \$ -335.83

11) MEDICAL

- a) Medical insurance, hospitalization; dental and prescription drug coverage is/shall be supplied by the defendant through the Defendant's employer at a cost of \$ 523.68 per week/month/year to the Defendant.
- c) Unreimbursed medical expenses up to \$ 250 annually per person not covered by insurance shall be paid by the custodial parent. The party seeking allocation of unreimbursed medical expenses in excess of 5250 a year must provide documentation of expenses to the other party promptly, and if no agreement can be reached, a Petition must be filed, no later than March 31<sup>o</sup> of the year following the calendar year in which the final medical bills. to be allocated were received.

Expenses exceeding that amount shall be paid: Plaintiff, up to 20% and Defendant, up to 80%.

If medical expenses should exceed \$ 1,350, the parties are free to petition the court for an order allocating expenses.

14) ALL PAYMENTS shall be mailed to: PA SCDU, P.O. BOX 69110, HARRISBURG, PA 17106. YOU CANNOT PAY YOUR SUPPORT IN CASH. You may pay your support with a check or money order payable to PA. SCDU. You must send a payment coupon with your check or money order. If you have more than one support case, you will receive only one bill each month. You should send one payment for all of

App.126a

your support cases. The SCDU divides the payment among your cases as required by Federal Law.

To pay \$ 100.00 COURT COSTS. (Payment must be made to Domestic Relations, 500 West Main St., Smethport, PA 16749.) **\*\*FILING FEE ALREADY PAID BY PLAINTIFP\*\***

/s/  
Hearing Officer

DATE: 8-12-16

**ORDER DENYING RECONSIDERATION,  
SUPREME COURT OF PENNSYLVANIA  
WESTERN DISTRICT  
(SEPTEMBER 22, 2025)**

---

IN THE SUPREME COURT OF PENNSYLVANIA  
WESTERN DISTRICT

---

JOSEPH HABIB GORO,

*Petitioner,*

v.

WASSEN GORO N/K/A WASSEN KANOUNO,

*Respondent.*

---

No. 90 WAL 2025

Reconsideration of the Petition for  
Allowance of Appeal

---

**ORDER**

PER CURIAM

AND NOW, this 22nd day of September, 2025,  
the “Reconsideration of the Petition for Allowance of  
Appeal to Supreme Court of Pennsylvania of Divorce  
Case and Spousal Support” is DENIED.

A True Copy Nicole Traini  
As of 09/22/2025

App.128a

Attest:

/s/ Nicole Traini  
Supreme Court of Pennsylvania

**Certification**

I hereby certify the within to be a  
true & correct copy thereof as filed  
in the office of the Prothonotary of  
McKean County, Pennsylvania.

/s/ Vicky M. Madine  
Prothonotary

## MARITAL ESTATE CHART

---

Goro v. Goro  
601 CD 2016  
Marital Estate Chart

Assets & Debts:

Valic 403(B) Account	\$ 183,449.07
Morgan Stanley IRA Account	\$ 26,640.49
CNB Bank Savings Account	\$ 96,701.72
Northwest Bank Savings Account	\$ 5,757.36
Northwest Bank Checking Account	\$ 66,238.29
Comerica Bank Account ending 0270	\$ 893,804.34
Charter One Account ending 010-1	\$ 19,941.13
2016 Lexus RX350	\$ 27,612.00
2010 Honda Pilot	\$ 10,650.00
MedCare Equipment Co. debt	\$ (156.70)
	\$ 1,330,637.70 Net Marital Estate

Proposed Distribution:

To Mrs. Goro:

Rollover from Valic 403(B)	\$ 183,449.07
Morgan Stanley IRA	\$ 26,640.49
Charter One Account ending 011-1	\$ 19,941.13
2010 Honda Pilot	\$ 10,650.00
Cash from Dr. Goro	\$ 124,764.86
MedCare Equipment Co. debt	\$ (156.70)
	\$ 365,318.85

App.130a

To Dr. Goro:

CNB Bank Savings Account	\$ 96,701.72
Northwest Bank Savings	\$ 5,757.36
Northwest Bank Checking	\$ 66,238.29
Comerica Bank ending 0270	\$ 893,804.34
2016 Lexus RX350	\$ 27,612.00
Cash to Mrs. Goro	\$ (124,794.86)
	\$ 965,318.85

\* Disposition outlined above acknowledges that while Dr. Goro is deemed to have retained the marital cash accounts referenced above in his column, those funds are no longer available for immediate distribution as he has entirely dissipated them.

\*\* The Alimony recommended herein is for \$2,500.00 per month for a period of 10 years (120 months) from the date the Divorce Decree is issued.

**STATEMENT OF ERRORS IN  
DIVORCE CASE 601 CD 2016  
(AUGUST 28, 2024)**

---

1- she didn't disclose her business called Julian's flowers and she dissolved it into her sister's business Gehan cover, see appeal notice and related attachments. The Fifth Third Bank did not disclose the loan that was given to Wassen for the business of Julian flowers.

2- she didn't disclose her saving account and CD .moreover the Citizens Bank/ charter one bank statements are falsified and altered, and the statement of Northwest Bank is not acceptable, which only shows one page. She didn't disclose her bank statements for some time and also her attorney Christin Borger redacted my Comerica bank statements please see the details in the appeal notice and attachments.

3- she is listed an owner in the house 38357 Pine Brook St., Sterling Height in Michigan .the house was sold on December 26, 2022 for \$276000.00 and was deposited in a bank account of her mother but her mother passed away on April 29, 2024 and she is the only one listed an owner with her mother so she has to disclose this house amount and it is equitable. see the appeal notice and attachment.

4- she committed adultery and according to state of Pennsylvania law, adultery is a ground, not to grant her alimony. Details are in the appeal notice.

5- she is getting spousal support from June 2016 until present time (over 8 years) and the marriage is very short, it is six years on papers, but she used to go to Michigan every year 4 to 6 months to run her business

## App.132a

and so the real time of marriage is less than three years and she should get only one year of spousal support. Moreover I submitted a motion to discontinue the spousal support 3 times which were denied by the Master. Moreover the Master overestimated the child support and spousal support according to calculations done by Attorney John Schaffranek(documents attached). The Master ignored her business value, business income. and all other assets. Wassen is the cause of delaying the finalization of the divorce because she is not disclosing her assets and I should not pay spousal support for the time longer than marriage time. I am asking the court to refund me and consider this in the assets division. the delay caused me to pay close to \$100,000.00 for attorneys, those attorneys were not transparent and honest. I am asking to cancel \$11,500.00 to her attorney because she caused the delay in finalizing the divorce. according to state law the spousal support is to pay for her expenses including attorneys fee.

6- she inherited from her father a lot of money in millions which comes from the two businesses of the father, the liquor merchant and the other one is orient communication. She has to disclose this inheritance, which is counted toward child support and spousal support.

7- she didn't work during the marriage and she didn't contribute to the family expenses and also she refused to work during separation.

8- she brought the report from PCP claiming that she has fibromyalgia so that she gets spousal support, but the physician is not qualified to diagnose fibromyalgia as she didn't perform the clinical tests required to diagnose fibromyalgia, and even she is not aware of

the names of the clinical tests, moreover fibromyalgia is not considered disability by Social Security and they ask those who actually have it to find a job. The transcript of the hearing on January 19, 2023 is available to the Court.

9- she committed child abuse as described in the appeal notice.

10- I am 68 years old and she is 51 years old. This is considered in the assets division.

11- Her IRA was \$52,000.00 as of March 2023, should be considered in the assets division. IRA was \$20,000 at the time of marriage and I contributed \$5000 to this account on May 2016.

12- she has to return the engagement ring which was \$10,000.00, according to Pennsylvania State law.

13-I am asking the Honorable court to consider all the above issues and cancel the Alimony \$300000.00 for 10 years which was later absolved into a lump sum of \$270000.00 on April 29,2024, and I am asking to cancel \$270000.00.

14- I am asking to cancel the cash for \$124000.00 since she got more than 8 years of spousal support. in addition she is not disclosing her assets that are mentioned above.

15- I am asking to cancel the amount she is getting from my pension plan (which is \$60000.00) since she didn't disclose her assets. moreover she got spousal support for more than 8 years. moreover I am asking to cancel the total of \$184,000.00 from my pension plan.

App.134a

16- I am asking to cancel the health insurance  
and beneficiary for my life insurance.

Respectively

/s/ Joseph Habib Goro, MD

August 28, 2024

**EXCEPTIONS FILED BY  
JOSEPH GORO IN MCKEAN COUNTY  
COURT OF COMMON PLEAS  
(DECEMBER 5, 2023)**

---

IN THE COURT OF COMMON PLEAS OF THE  
48TH JUDICIAL DISTRICT OF PENNSYLVANIA  
MCKEAN COUNTY BRANCH CIVIL DIVISION

---

JOSEPH HABIB GORO,

*Plaintiff,*

v.

WASSEN GORO,

*Defendant.*

---

No. 601 C.D. 2016

---

**EXCEPTIONS**

**Exceptions to Master Recommendation**

1. She didn't disclose her businesses: Julian's Flowers as well as Gehan's Covers and Linens. Her sister's name on the registry is considered to be a point of contact, and not the owner.

a. I presented 3 copies of checks signed by Was-sen for the payments of loans for the Julian's Flowers business. The dates of the checks were in February, March and April of 2010.

The checks were cashed from Charter One/Citizens Bank, and were then paid towards the loan she had with Fifth-Third Bank. This is outstanding and strong evidence that she owned this business. The Fifth-Third Bank was subpoenaed and the bank stated that they don't retain records of loans over seven years old.

- b. Moreover, she also told me in the beginning of the marriage that she placed a \$150,000 down payment for this business. Her Attorney Melanie Hoover admitted this on December 18, 2018 in front of the Master. It is recorded that she had the business. In addition, she strongly insisted on a prenup after one year of marriage, which indicates that she had a lot of assets. In the last Master hearing on September 28, 2023, Wassen stated that Julian's Flowers and Gehan's Covers and Linens are the same business. This indicates that they may have been dissolved and put under one of her relatives' names.
2. In terms of bank accounts, at first she denied that she had any bank accounts in March 2019 during the interrogatories. After I insisted that she had a Charter One/Citizens Bank and Northwest Bank accounts, she then disclosed only 3 pages of bank statements. One was from Citizens Bank in 2012 and the other from the same bank in 2016. There was also one printed page from Northwest Bank, which was not acceptable, and only showed \$85. She was asked for the statements in March of 2019, and refused to provide these three pages until August 2019. She refused to show full statements from the beginning of the marriage in

March 2010 until the separation in June 2016. While I had shown everything, her lawyer was goading me during the hearing in August 2019 in regards to my statements, while Wassen was able to get away with providing next to nothing. It was also clearly evident that the statements were falsified and altered, rendering them unacceptable.

3. Factors to consider in the assets division include:

- a. Age: I am 68 years old and she is 52 years old.
- b. On paper, the marriage began March 11, 2010 until the separation on June 6, 2016. She also used to go to Michigan every year for 4 to 6 months to run her business. Taking this into account, the actual time of the marriage was less than 3 years, which is considered to be a short marriage.
- c. She didn't work during the marriage and didn't contribute to family expenses.
- d. She was violent and aggressive during the entire marriage. There was also an incident that was reported to the police where she hit me with a hammer. She constantly used to break stuff in the apartment. She has thrown my phone at the wall and also broke my mother's picture. Wassen has constantly used foul language in person and through text in the Iraqi language. This was submitted to the court on March 3, 2020. Her most recent usage of foul language was on October 8, 2023.

- e. She was very defiant and hated my family, even though they were incredibly kind to her. She didn't allow me to speak to my mother who was very sick and used to be admitted to hospital frequently. However, she was speaking to her parents and sister all the time without me saying anything. She mandated that she didn't want anyone to talk to me, but instead she wanted me only to concentrate on her family. Her family were very strange people who despised all people outside of themselves.
- f. She committed adultery during the marriage.
  - i. One day I was at home with our young son I.G.. She came home from shopping and I saw this random guy was in front of the building all the time. He chased her to the garage, talked to her, and then he came to open the door for her. I went out, carrying I.G. with me, and he was trying to hint to her that your husband is at the door. She spoke to him very lovingly. When she came in, I asked her why the man was chasing her to the garage and why she was speaking to him with loving verbiage. She responded that she was free to do what she wanted and that it was none of my business.
  - ii. The day before traveling to Michigan in May of 2016, I was laying with I.G. in the bedroom and suddenly I heard the door open. There had not been any knocking on the door or ringing of the

buzzer. She spoke to the same man I had seen before for a long period of time. I recognized him from his voice, and confronted her as to why she had opened the door for someone that had not even knocked or been buzzed in. She stated that he was looking for change and that she waved to him from the window. In reality I heard her telling her lover goodbye and that she was going to Michigan the next day. This demonstrates a married woman saying goodbye to someone she knew and that she was having an affair with.

- iii. On Sunday January 15, 2016, she took I.G. with her and disappeared in the building for 2 hours. Because it was very late, I went to look for her everywhere in the building but couldn't find her. That day was very cold and snowy. I went out again, and finally found her standing in the main door of the building with I.G.. I asked her where she disappeared to. She stated that she was taking I.G. up and down in the elevator, but that was a blatant lie as I had taken the elevator to search for them in the building. She was most likely engaging in her affair, with our six month old baby with her.
- iv. She was always trying to talk to him or look for him from the kitchen window. One day I caught them waving to each other, and she acted very strange when

App.140a

I asked about it. She also constantly stood in front of the building, as if she was waiting for her lover.

- v. She used to strip naked in front of the window, which was visible to everyone because our apartment was on the first floor, probably searching for somebody.
- vi. She used to meet with her lover in the laundry room of the apartment, which was located in the basement. I saw them together several times there.
- vii. According to Pennsylvania State Law 14, adultery is considered in the court of law as circumstantial.

g. Child abuse is another factor. She has abused I.G. his entire life. He constantly came home to me with bruises and burns. He would cry during every custody exchange. Presently, she burned I.G. on July 6, 2023 and the school called the state child abuse line. As usual, CYS protected her and not the child. The Warren County CYS deemed that I.G. had endured child abuse in June 2016. However, when the records were transferred to the McKean County CYS, this was changed. To this day, he cries whenever I have to take him to her and does not want to go.

- i. Wassen requested that the court remove child abuse from her criminal record on October 8, 2018. This was denied by the court.

App.141a

- ii. She has despised from the time she found out that he was a boy when she was pregnant. When she found out he was a boy, she began dieting. The OB physician commented that they had never seen a woman that did not gain weight during a pregnancy. I.G. is delayed in speech due to her abuse and neglect. She deprives him of love, care, food, clean clothes and a happy childhood.
- iii. She didn't take him to IU9 for speech therapy for 37 days.
- iv. During the marriage, she would refuse to take care of I.G. when I came home from work. She would also sleep in a separate room from I.G. and me. I was the sole caretaker for I.G. during the night. To make sure he was taken care of, I would feed him and change his diaper in the morning. I would then come home from lunch to change him and feed him because I knew she would have refused to do so while I was at work. While I was at work, she would text me to come home early to take care of I.G.. When I came home from work, I would immediately change his diaper and feed him. She refused to take care of him on Saturdays and Sundays because I was there.
- h. She received her cancer treatment in Bradford and Olean. She was not treated in Michigan for her cancer as the Master mentioned in her report.

App.142a

- i. She didn't disclose that she had cancer before the marriage, when she definitely knew about it. Immediately after we were married, she insisted that she had to get a mammogram. I told her to go to a primary care provider (PCP) to order it, but he didn't order for her. As a result, she insisted that I had to call the PCP and ask him to order a mammogram. She wouldn't have emphasized it so heavily if she didn't know about it beforehand. According to our church, everyone getting married needs to disclose his/her serious illnesses. However, I was gracious and helped her receive treatment.
- j. She claimed that she didn't go on a honeymoon, but this occurred for various reasons. First, she did not want to go. Second, she went to her family in Michigan immediately after the marriage and stayed there for one month as a newlywed. After she came from her family, she became busy with cancer treatments for 1 year in Bradford, Olean, and Buffalo. Again, she was not treated for cancer in Michigan as mentioned in the Master report. In addition, I offered for her to do IVF before starting chemotherapy. I took her to Buffalo, New Jersey, New York City and finally to the Cleveland clinic, who agreed to do it.
- k. She is claiming that she had fibromyalgia, but the physician who gave her the report is not qualified to give this diagnosis. The physician did not perform the clinical tests to diagnose the fibromyalgia, and wasn't even

## App.143a

aware of the names of the clinical tests needed to diagnose fibromyalgia. Social security does not even consider fibromyalgia as a disability and they mandate those who actually have it to work.

4. The splitting of the assets is not fair. The Master ignored her businesses and bank accounts that were falsified. She also did not take into account Wassen's business value and business income during the marriage. Moreover, the money that I transferred is a gift to family members that were in great need. I also donated to the hospital to support the community and to take care of fellow residents.

a. Important to note is that Wassen did not disclose the businesses, the income of the business and the inheritance from her father. Her father owned the Merchant Liquor business and Orient Communication. Inheritance is taken into account for child support and spousal support.

5. I have been paying spousal support and child support since the separation until present time and the master didn't count it towards her assets. That should have been considered in the final order.

### 6. Modifications of the Court Order

a. I am asking to cancel the Alimony for next 10 years as this is completely unfair. Wassen is able to work and the custody is 50/50. I am working full time and she received spousal and child support from the separation until present time (2016-2023). I have applied 3 times to stop spousal support. These were denied by the Master.

App.144a

- b. I am asking to cancel the cash for \$124,000. The spousal support has to be counted from June 2016 until the present time.
- c. I am asking to cancel the health insurance as she is able to work and get health insurance.
- d. I am asking to cancel her as a beneficiary for my life insurance. This is only paid in case of an accident. While I am working, there are no cash options. If I retire or quit working in the hospital, there will be no payout. My only beneficiary is my son I.G..
- e. My Comerica bank account was separate and not a joint account. She refused to put her money with mine in a joint account, insisting that she wanted a separate account. The Comerica bank had \$823,000. I had transferred \$279,000 to an old National Bank account prior to marriage. As a result, this is not to be counted as marital money. Her attorney was giving this amount to the Master as marital money.
- f. I paid for the Lexus car loan after the separation, which was \$18,000, and she has to pay half of it. This car is personal and not equitable.
- g. I also paid for the storage of I.G.'s stem cells after the separation in the amount of \$5500. She has to pay for half of this amount as well.
- h. For the Honda Pilot car, I paid \$32,000. It was meant to be for the family and not a gift

for her. It is equitable, and she has to pay for half of it.

- i. Per Pennsylvania State Law, she has to return the diamond wedding ring, which cost \$10,000.
- j. I paid for the engagement party and the wedding in full, with expenses amounting to over \$25,000.
- k. Wassen is listed as the owner of the house on 38357 Pinebrook Drive, Sterling Heights Michigan. It was sold for \$276,000 and she has to disclose this amount, which was paid to an account of her mother. I do not believe that her mother has this money in her possession. Her mother is 88 years old and getting state benefits, despite being listed as the owner in the documents, suggesting that it is in Wassen's possession.
- l. My pension plan is \$361,000 and the Master is giving her \$184,000, which is not fair to me. My pension at the time of the separation in June 2016 was \$109,000. According to the factors listed above, she shouldn't get 50% of my plan, and definitely not 50% of my current plan instead of the plan at the point of separation.
- m. In addition her IRA had a value of \$52,000 in March 2023, and was \$20,000 at the time of marriage. I contributed about \$5000 to this IRA account in May 2010. She told me she would make it a joint account, but she never did. That is why I didn't put more

money into the account. This was not counted with her assets.

- n. In not disclosing her assets, business values, and inheritance, all of which are counted towards child and spousal support, she has caused a very long delay in finalizing this case. This has caused me to pay close to \$100,000 to attorneys and to this day, I am not done with this case. I ask the court to consider the fees to attorneys who didn't do their job in a transparent and honest manner.

Respectively,

/s/ Joseph Habib Goro, MD  
12-5-2023

**NOTICE OF PROCESS TO FILE EXCEPTIONS  
(AUGUST 16, 2016)**

---

IN THE COURT OF COMMON PLEAS OF  
MCKEAN COUNTY, PENNSYLVANIA  
DOMESTIC RELATIONS SECTION  
COURTHOUSE, 500 W MAIN ST,  
SMETHPORT PA 16749-1144-00  
PHONE: (814) 887-3366 FAX: (814) 887-5090

---

Plaintiff Name: Wassen Goro  
Defendant Name: Joseph Goro  
Docket Number: DR99-16  
PACSES Case Number: 900115973

Wassen Goro  
24 Orchard Pl #108  
Bradford PA 16701-1075

Dear Wassen Goro

Attached is a copy of the recommended order which was made at your recent hearing before the Domestic Relations Section. It will be docketed with the Court. This recommended order will be made an Order of Court within twenty (20) days unless you file exceptions to it. If you file exceptions, the recommendation will be Interim Order of Court until the Court make a decision in your case. If you plan to file exceptions you must do so within twenty (20) days. Your last date for filing exceptions is SEPTEMBER 5, 2016. If there are any questions, contact this office.

Sincerely,

/s/

For Amy J Lathrop

**SPOUSAL SUPPORT GUIDELINE  
CALCULATION WITH  
DEPENDENT CHILDREN  
(FEBRUARY 17, 2023)**

---

IN THE COURT OF COMMON PLEAS OF  
MCKEAN COUNTY, PENNSYLVANIA  
DOMESTIC RELATIONS SECTION  
COURTHOUSE, 500 W MAIN ST,  
SMETHPORT PA 16749-1144-00  
PHONE: (814) 887-3366 FAX: (814) 887-5090

---

Plaintiff Name: Wassen Goro  
Defendant Name: Joseph Goro  
Docket Number: DR99-16  
PACSES Case Number: 900115973

	Defendant	Plaintiff
1. Monthly Net Income	\$13,349.75	\$919.90
2. Less All Other Support	\$0.00	
3. Difference	\$13,349.75	\$919.90
4. Income Available for Spousal Support	\$13,349.75	\$919.90
5. Net Income % for Spousal Support or Alimony Pendente Lite	25%	30%

App.149a

6. Share of Income Available for Spousal Support or Alimony Pendent Lite	\$3,337.44	\$275.97
7. Preliminary Monthly Spousal Support or Alimony Pendente Lite Amount	\$3,061.47	\$0.00
8. Adjustment for Health Insurance	\$0.00	\$0.00
9. Adjustment for Unreimbursed Medical	\$0.00	\$0.00
10. Total Monthly Spousal Support or Alimony Pendente Lite Amount	\$3,061.47	\$0.00

Spousal Support Guideline Calculation without dependent Children Defendant Plaintiff

	Defendant	Plaintiff
5. Net Income % for Spousal	33%	40%

App.150a

Support or Ali- mony Pendente Lite		
--	--	--

Summary

Date: February 17, 2023

Monthly Obligation amount selected \$3,981.81

Payment Frequency Monthly

Obligation amount \$3,981.81