IN THE DISTRICT COURT OF IOWA
IN AND FOR JEFFERSON COUNTY

Frederick Shaddock, Petitioner, pro se
v.
Oksana Shemet Shaddock, Respondent
Case No. CDCV402015

PETITIONER'S WITNESS LIST

COMES NOW, the Petitioner, Frederick Shaddock, and submits this formal list of witnesses who will be called to testify at the hearing scheduled for October 7 regarding the Stay Away Order. Each witness is expected to provide testimony that is relevant to the disruptive and harmful behavior of the Respondent, Oksana Shemet Shaddock, during her recent uninvited stay at the marital residence in Fairfield, Iowa.

---

1. David Townsend (primary witness)

- **Relation to the Case:**
  David Townsend is a 78-year-old U.S. Army veteran who served in the Vietnam War. He is a resident at the Fairfield house and receives home care assistance from the Petitioner.
- **Expected Testimony:**
  David Townsend will testify that Respondent's behavior has had a detrimental impact on his mental and physical health. He will describe how Respondent's yelling and demands have worsened his PTSD and have been reminiscent of the Drill Instructors he encountered at boot camp in the 1970s.
  He will further testify that his doctor has prescribed a peaceful environment for his recovery, which has been disrupted by the Respondent's presence. David Townsend's testimony is crucial in demonstrating how the Respondent's actions have caused significant distress in the household.
- **Method of Appearance:**
  Mr. Townsend can testify via Zoom or phone due to his health condition.

2. Miss A (Initials used to protect privacy, optional if there is time)

- **Relation to the Case:**
  Miss A is a professional caregiver, with years of experience with the elderly and disabled, who resides at

the Fairfield house. She has assisted Mr. Townsend with his medical care, including driving him to doctor appointments at the Jefferson County Health Center.

- **Expected Testimony:**
  Miss A will testify about the disruptive and stressful environment caused by Respondent's recent presence at the house. She will explain that Respondent's harassment has prompted her to temporarily leave the home and stay with family. Miss A has moved her most essential belongings from her room while Respondent is in the house.
- **Additional Evidence:**
  Miss A's text message to the Respondent, refusing to participate in Respondent's scheme to fabricate further accusations against the Petitioner, will also be presented as evidence. Miss A's text stated, "No, I won't make up more crap," which underscores the false nature of Respondent's claims.
- **Method of Appearance:**
  Miss A can testify via phone as she may be with a client or on travel. Her phone number will be sent to Respondent's attorney, for privacy and equal access. .

Supporting Evidence:

In addition to the testimony of the witnesses listed above, Petitioner will provide:

1. **Medical Documentation** from Mr. Townsend's doctor prescribing a peaceful environment due to his diagnosed PTSD, for which he receives a pension from the U.S. Veterans Administration.
2. **Video Evidence** documenting Respondent's disruptive behavior, including her shouting "the F word" loud enough, and turning on bright lights, to disturb Mr. Townsend while trying to rest and recover..
3. **Text Messages** from Miss A to Respondent, indicating her refusal to participate in false accusations.

RESPECTFULLY SUBMITTED,
Frederick Shaddock,
Petitioner, pro se
Date: October 4, 2024
cc: Oksana Shemet Shaddock, Respondent (via electronic filing)