

been entered compelling Mr. Hann to turn over these documents as verification, to date he has refused to do so.

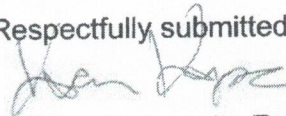
If there was any problem as to Mr. Hann's disability, that blame lies solely with Mr. Hann and in no way is a result, or within the control of Ms. Flax. Mr. Hann has not been forthcoming with any information about his income during the past four years. Mr. Hann has intentionally refused, in violation of the Court Orders, to provide any information related to his disability and social security claim. Ms. Flax has not resided with Mr. Hann for several and therefore does not have any idea if Mr. Hann is working or able to work. He continually claims under oath in Court proceedings that he is completely disabled and has no income. Even as recently as November 3, 2022, Mr. Hann represented under oath in his Case Information Statement at Paragraph F that he is 100% medically disabled. **See attached.**

Ms. Flax is unable to reimburse Social Security for any of the monies allegedly due and owing. She is struggling to raise 3 children, with little to no financial support from their father, Glenn Hann, except for the Social Security monies she received. The money that she has been receiving from the disability payments for her children was utilized to pay for the children's basic needs (shelter, food and clothing). Ms. Flax's receipt of the derivative Social Security payments was factored into Mr. Hann's child support obligation. It is respectfully submitted that to now require Ms. Flax to reimburse Social Security \$14,281.00 per child would be a miscarriage of justice. Ms. Flax will be filing a Certification in Burlington County specifically requesting that Mr. Hann be solely responsible for repaying any monies to Social Security if repayment is required.

Accordingly, it is requested on Ms. Fax's behalf that all money that Social Security Administration is seeking reimbursement be waived. In the alternative, it is Ms. Flax's position that Mr. Hann be solely responsible for repaying the amount owed without a contribution from Ms. Flax. Please consider this letter a formal and timely appeal of the October 24, 2022 decision.

Thank you for your consideration.

Respectfully submitted,



Karen Rose Karpousis, Esquire

KRK/jo

Enclosure

cc: Lisa Flax (*via email only with enclosures*)
Glenn Hann (*via email only with enclosures*)
JoAnne O'Connor, Esquire (*via email with enclosures*)