

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NIR VELOZNY, *on behalf of minor children R.V.,  
N.V. and E.V.*,

Petitioner,

v.

TAL VELOZNY,

Respondent.

Case No. 1:20-cv-06659-GBD

**DECLARATION OF RAVIT BEN SAROUK-VELOZNY IN SUPPORT OF PETITIONER  
NIR VELOZNY'S MOTION FOR SUMMARY JUDGMENT**

I, RAVIT BEN SAROUK-VELOZNY, under penalty of perjury of the laws of the United States pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a citizen of Israel over the age of 18. I am an attorney licensed to practice law in Israel. I graduated from Ramat Gun University in 2001 with an M.A. degree in civil and commercial law. I qualified as an attorney in 2001, when I received my certificate from the Justice Department of Israel, and I have been qualified to practice law in Israel since that time.

2. I began my career working in the firm of Shashon and David law firm, with offices in Tel Aviv, Israel, specializing in litigation. After four years, I opened my own office, specializing in civil and family law. I have worked as an attorney in my office since 2005.

3. I am Petitioner Nir Velozny's sister-in-law. I am submitting this Declaration because I understand that Nir's wife, Respondent Tal Velozny, has claimed in her court submission that Nir consented or acquiesced to his children being removed from Israel and moving to New York. Any such claim is completely false.

4. Tal filed a police complaint against Nir on or about July 31, 2019, Nir could not return to the family home for 21 days. This is a requirement of Israeli law. After Nir left his home, he asked me to speak with Tal in order to arrange for him to visit his children. I was asked to assist in this effort because Nir was very upset by his wife's actions. My effort to arrange visitation with Respondent failed, and I told Nir to file a request for mediation with the Rabbinical Court – this is a mandatory procedure that must be done before a divorce can be issued under Israeli law. The Rabbinical Court set a hearing for October 2, 2019, for both sides to sit down with social workers. The social workers try to resolve the couple's differences either without divorce or will assist with making the divorce a smooth process. Tal failed to show up to that meeting because she had left the country with the children, without any agreement, authorization, or consent from Nir or the Rabbinical Court.

5. Prior to Tal's kidnapping of the children from Israel, in August 2019, I had two meetings to try and help with Nir and Tal's marital issues. Importantly, Tal and Nir did not attend either meeting. The first meeting was on August 8, 2019, between me, Tal's parents, and their attorney, Racheli Bash. This meeting came about because Tal's mother, Nomi Kollnesher, asked me to try and bridge the differences between Nir and Tal. Nir did not know about the August 8 meeting at the time, because he was very upset about the actions of Tal and he was only concerned with being able to visit with his children – not reconciling with Tal.

6. Nothing was resolved at the August 8, 2019 meeting. During the August 8 meeting, the attorney for Tal's parents, Racheli Bash, raised the issue of the children being moved to New York. I made clear that Tal could not and should not take the children out of Israel until Tal and Nir had resolved their marital issues.

7. On August 26, 2019, I had a second meeting but only with Racheli Bash, the attorney for Tal's parents. Nir did know that I was having this second meeting. Neither Tal nor her parents attended the August 26 meeting. Before I met with Racheli Bash, Nir told me that he objected to his kids living overseas without him. The purpose of the second meeting was to discuss visitation hours and times for Nir to visit the children *in Israel*.

8. After the second meeting on August 26, Racheli Bash sent me a draft divorce and custody agreement that included language allowing the children to move from Israel to New York. This draft agreement was prepared by Racheli Bash, and was not authorized or agreed to by me or by Nir. Nir never signed any agreement, consenting to his children moving from Israel to New York.

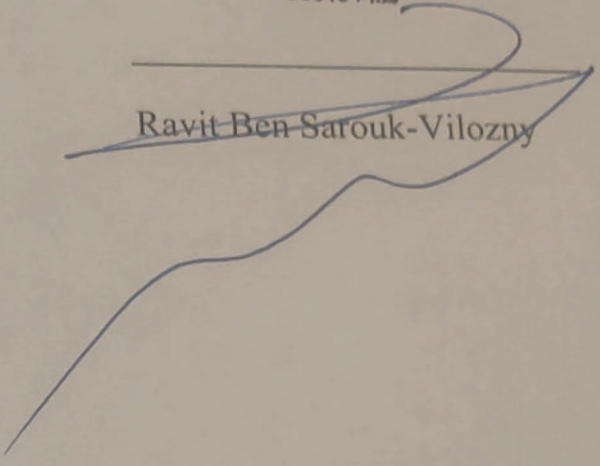
9. I made clear to Racheli Bash that her proposal for the children to move to New York was unacceptable, as it went against Nir's wishes and was not in the children's best interest.

10. On or about August 27, 2019, I specifically sent a WhatsApp message to Racheli Bash, stating "I just want to make it clear that they [meaning Tal and her parents] are asked, of course not to take the children abroad in the meantime, without the consent of the father."

11. After Tal kidnapped the children and moved to New York on or about September 28, 2019, without Nir's consent or agreement or even knowledge, I tried contacting Racheli Bash to find out what was going on and to help Nir seek the return of his children. Racheli Bash stopped answering my phone calls and emails.

Executed on: March 23, 2021

רזית בן סרווק-וילוזני, ע"ד  
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Ravit Ben Sarouk-Vilozny