

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**  
**Family Division**  
Domestic Relations Branch

**BETH MYNETT,**

:

Plaintiff,

:

v.

:

Case No. 2019 DRB 003033

**TIMOTHY MYNETT,**

:

Defendant.

:

**ANSWER TO COMPLAINT FOR LEGAL SEPARATION, CUSTODY, CHILD  
SUPPORT, EQUITABLE DISTRIBUTION OF PROPERTY  
AND OTHER RELATED RELIEF**

The Defendant, Timothy Mynett (“Mr. Mynett”), by and through his undersigned counsel, answers the Complaint for Legal Separation, Custody, Child Support, Equitable Distribution of Property and Other Related Relief (hereinafter “Complaint”) filed by the Plaintiff, Beth Mynett (“Ms. Mynett”) as follows:

1. Mr. Mynett admits the allegations contained in paragraph 1 of the Complaint.
2. Mr. Mynett admits the allegations contained in paragraph 2 of the Complaint.
3. Mr. Mynett admits the allegations contained in paragraph 3 of the Complaint.
4. In response to paragraph 4 of the Complaint, Mr. Mynett affirmatively avers that the parties have a thirteen year old son, William Mynett, born February 8, 2006. Mr. Mynett admits that since the date of the parties’ separation, William has lived primarily with Ms. Mynett but spends substantial time and overnights with Mr. Mynett. Mr. Mynett avers that both parties are fit and proper persons to have custody of William.

5. In response to paragraph 5 of the Complaint, Mr. Mynett admits that on April 7, 2019, the parties physically separated from one another. Mr. Mynett further admits that on April 7, 2019, after Ms. Mynett confronted him about the unhappy nature of their marriage, he informed Ms. Mynett that his heart was no longer in the marriage. Mr. Mynett denies that he told Ms. Mynett he was leaving the marriage for Representative Ilhan Omar (“Rep. Omar”) or that he was in love with her. Mr. Mynett admits that Ms. Mynett asked him to leave the marital home and he did so, respecting her request. Mr. Mynett denies the remainder of the allegations in paragraph 5 of the Complaint.

6. In response to paragraph 6 of the Complaint, Mr. Mynett lacks sufficient knowledge or information to either admit or deny Ms. Mynett’s belief that there is no hope of reconciliation. Mr. Mynett admits that the parties’ separation is mutual and voluntary.

7. Mr. Mynett admits the allegations contained in paragraph 7 (and related subparts) of the Complaint.

8. In response to paragraph 8 of the Complaint, Mr. Mynett denies that Ms. Mynett has always been the primary caregiver to William and further denies that Ms. Mynett had greater responsibility in his care and upbringing. Mr. Mynett affirmatively avers that he has been a part of William’s life and upbringing every day of William’s life, including playing a leading role in all of William’s extracurricular activities and commitments. Mr. Mynett further avers that he likewise fully participated in the care and upbringing of Ms. Mynett’s daughter from her previous marriage and fully engaged in his role as her step-father.

9. In response to paragraph 9 of the Complaint, Mr. Mynett denies any allegation which characterizes his work-related travel as being related to the furtherance of a relationship with Rep. Omar. Mr. Mynett further denies the characterization of his mental and emotional state

when he was home. Mr. Mynett affirmatively avers that the nature of his work requires him to travel and that his travel increased during the summer and fall of 2018 as a result of his work building a new business, raising funds for a Political Action Committee and working to elect three candidates to the United States House of Representatives in the run-up to the 2018 mid-term elections.

10. In response to paragraph 10 of the Complaint, Mr. Mynett denies any allegation which calls into question his judgment or ability to care for William. Mr. Mynett further denies that he admitted an “affair” and affirmatively avers that when the parties’ separated in April 2019 he clearly stated to Ms. Mynett that he had not engaged in any physical or sexual relationship with Rep. Omar. Mr. Mynett admits that William had requested to meet Rep. Omar since Mr. Mynett began to work with her in 2018, as William had done with every member of Congress with whom Mr. Mynett has worked. To that end, the three of them went for a casual dinner. Mr. Mynett denies the allegations in the last sentence in paragraph 10 of the Complaint.

11. Mr. Mynett denies the allegations in paragraph 11 of the Complaint.

12. In response to paragraph 12 of the Complaint, Mr. Mynett denies the entirety of the allegations in the first sentence. Mr. Mynett admits the remainder of paragraph 12 of the Complaint.

13. In response to paragraph 13 of the Complaint, Mr. Mynett denies that it is in William’s best interest to be in the primary custody and care of Ms. Mynett. Mr. Mynett admits that both Ms. Mynett and himself have a close relationship with William and Mr. Mynett admits that both parents are fit and proper persons to have custody of William. Mr. Mynett admits that both parties should have access to William.

14. In response to paragraph 14 of the Complaint, Mr. Mynett admits the allegations in the first two sentences. Mr. Mynett denies that the parties' salaries are comparable and affirmatively avers upon information and belief that Ms. Mynett's salary is more than twice what Mr. Mynett presently earns. Mr. Mynett lacks sufficient knowledge or information to either admit or deny the characterization of the potential growth of his income. Mr. Mynett admits that both parties are able to contribute to the support of William.

15. Mr. Mynett denies that Ms. Mynett has been a loving and devoted partner to him throughout their marriage. Mr. Mynett denies that Ms. Mynett has been unwavering in her support of his career. Mr. Mynett lacks sufficient knowledge or information to either admit or deny the balance of the allegations in paragraph 15.

16. In response to paragraph 16 of the Complaint, Mr. Mynett admits that the marital home was acquired before the parties' marriage and admits that Ms. Mynett contributed some limited amount of money to the closing costs. Mr. Mynett admits that Ms. Mynett earned more income during the marriage as a result of the fact that she was more established in her career at the time of their marriage, and therefore had more funds available to her during the marriage to contribute to the costs of the marital home. Mr. Mynett denies the remaining allegations in paragraph 16 of the Complaint.

17. In response to paragraph 17 of the Complaint, Mr. Mynett admits the allegations in the first sentence. Mr. Mynett admits that Ms. Mynett earned more income than he did during the marriage but denies the characterization that she was the "primary breadwinner." Mr. Mynett admits that both parties made contributions to the acquisition, preservation, and appreciation in value of the parties' marital estate.

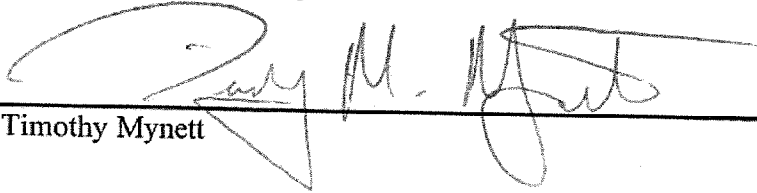
18. In response to paragraph 18 of the Complaint, Mr. Mynett admits that he developed a successful career during the parties' relationship. Mr. Mynett denies the remaining allegations in paragraph 18 of the Complaint.

19. Mr. Mynett denies the allegations in paragraph 19 of the Complaint. Mr. Mynett affirmatively avers that he worked tirelessly both through counsel and directly with Ms. Mynett to achieve a mutually agreeable, out of court settlement. Mr. Mynett further avers that in response to his attempts at settlement he was routinely met by Ms. Mynett with threats of a public court filing, if her unreasonable and often outrageous demands were not met. Mr. Mynett denies the remaining allegations in paragraph 19.

20. Mr. Mynett is without sufficient information or knowledge to either admit or deny the allegations in paragraph 20 of the Complaint.

WHEREFORE, Defendant respectfully prays that this Court dismiss Plaintiff's Complaint for Legal Separation, Custody, Child Support, Equitable Distribution of Property and deny her requests for other or related relief and grant the relief requested by the Defendant in his Counterclaim for Legal Separation, Custody, Child Support, and Other Relief.


I hereby affirm that the statements made in the foregoing Answer to Complaint for Legal Separation, Custody, Child Support, Equitable Distribution of Property and Other Related Relief are true and accurate to the best of my knowledge, information and belief.

A handwritten signature in black ink, appearing to read "Timothy Mynett", is written over a solid horizontal line.

Timothy Mynett

Respectfully submitted,

AIN & BANK, P.C.



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**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of August 2019, a copy of the foregoing Answer to Complaint for Legal Separation was served by Case File Express on Counsel for Plaintiff, Jonathan M. Dana, Esquire, Jennifer A. Davison, Esquire, Feldesman, Tucker, Leifer, Fidell LLP, 1129 20<sup>th</sup> Street, NW, Suite 400, Washington, D.C. 20036.

  
Sarah E. Mancinelli