I. Pseudologia Fantastica.

A psychiatric defect categorized as a factitious disorder in the Diagnostic and Statistical Manual of Mental Disorders (3d ed. 1987) ["DSMIII-R"], sometimes referred to as 'Munchausen's Disease', named after Baron von Munchausen, a German storyteller who wandered the countryside telling lies.

- 'Pseudologia Fantastica' is often characterized as an extreme form of pathological lying. (R. Sharrock and M. Cresswell, Pseudologia Fantastica: A Case Study of a Man Charged with Murder, 29 Med.Sci.Law. 323, 323 (1989))

- Pseudologues represent fantasies as real occurrences. "These fantasies often involve dramatic, grandiose, and exaggerated events consciously acknowledged as false by the patient, yet presented as truth." (Charles W. Dithrich, Pseudologia Fantastica, Dissociation, and Potential Space, in Child Treatment, 72 Int.J.Psycho.Anal. 657, 657 (1991))

- "External reality is negated by an enthralling, seductive and exciting inner world in which anything is possible." Id. at 658. The gain for the pseudologue could be ego enhancement or the attention received as a result of the story. (Sharrock and Cresswell, supra at 323)

- A person with Munchausen's Syndrome may intentionally cause injury to themselves to support their lies. Many lie for no apparent reason, in circumstances where they have nothing to gain from not telling the truth. (Anne Vaughan, "Believe me--I cannot tell the truth," The Independent, July 9, 1991, at 13)

- Pseudologues are also often highly compliant and suggestible to misleading information. (Sharrock and Cresswell, supra at 323) "'They are often histrionic or suggestible types who thrive on attention and lie for a quick high...and don't worry about the consequences.' " (Vaughan, supra.) Even when confronted with their lies, many pseudologues are unable to control their lies. Id.

- As noted by one doctor, "[one] group of pseudologues loves the excitement and power that helping the police brings. It makes them feel important and they relish all the attention and fame that they receive from the case...'." Id.
Munchausen's Syndrome' is a factitious disorder, and the DSM-III gives the following explanation of the voluntary character of a factitious disorder:

"The judgment that the behavior is under voluntary control is based, in part, on the patient's ability to simulate...in such a way that he or she is not discovered. This involves decisions as to timing and concealment that require a degree of judgment and intellectual activity suggestive of voluntary control. However, these acts have a compulsive quality, in the sense that the individual is unable to refrain from a particular behavior, even if its dangers are known. They should therefore be considered 'voluntary' in the sense that they are deliberate and purposeful, but not in the sense that the acts can be controlled. Thus, in Factitious Disorders, behavior under voluntary control is used to pursue goals that are involuntarily adopted." Diagnostic and Statistical Manual of Mental Disorders (3rd ed. 1980 at 285).

In U.S. v. Shay, 57 F.3d 126 (1st Cir.1995), Dr. Phillips, a psychiatrist, was to testify that Shay Jr. suffered from a mental disorder known as "pseudologia fantastica" (Munchausen's) and that the pseudologia fantastica caused Shay Jr. to fabricate lies that would place him at the center of attention. Id. at 129-30. According to Dr. Phillips' expert opinion, pseudologia fantastica is a psychiatric defect that entails attention seeking and causes a person to:

- Spin out webs of lies;
- Place themselves in the center of attention;
- Tailor their words to the particular audience;
- Create fantasies in which they are the central figure;

In the case of Bradley Corp. v. Zurich Ins. Co., 984 F.Supp. 1193,1196 (E.D.Wis. 1997), A Ms. Sarafolean had fabricated stories about sexual harassment. An expert psychologist and psychiatrist diagnosed a mental illness as the cause of her fabrications, diagnosing that she suffered from Pseudologia Fantastica, a personality disorder marked by compulsive lying.

H. Psychopathic Personality.

Cleckley defines 'psychopathic personality' as one who has the following characteristics:

(1) Superficial charm and good 'intelligence.'
(2) Unreliability.
(3) Untruthfulness and insincerity.
(4) Lack of remorse or shame.
(5) Inadequately motivated antisocial behavior.
(6) Poor judgment and failure to learn by experience.
(7) Pathologic egocentricity and incapacity for love.
(8) General poverty in major affective reactions.
(9) Fantastic and uninviting behavior with drink and sometimes without.
(10) Suicide rarely carried out.
(11) Failure to follow any life plan.

Cleckley, The Mask of Sanity 238--255
The word 'psychopath' according to some means 'a sick mind.' Guttmacher & Weihofen 86, Psychiatry and the Law:

'In the light of present knowledge, most of the individuals called psychopathic personalities should probably be considered as suffering from neurotic character disorders. They are, for the most part, unhappy persons harassed by tension and anxiety, who are struggling against unconscious conflicts which were created during the very early years of childhood. The nature and even the existence of these conflicts which drive them restlessly on are unknown to them. When the anxiety rises to a certain pitch, they seek relief through some antisocial act. The frequency with which this pattern recurs in the individual is dependent in part upon the intensity of the unconscious conflict, upon the tolerance for anxiety, and upon chance environmental situations which may heighten or decrease it. One of the chief diagnostic criteria of this type of neurotically determined delinquency is repetitiveness of the pattern. Id., at 88--89.

Another expert, Caldwell, Constitutional Psychopathic State (Psychopathic Personality) Studies of Soldiers in the U.S. Army, 3 J. Crim. Psychopathology 171--172, classifies such a person under three headings:

- **Acting:** (1) inability to withstand tedium, (2) lack of a sense of responsibility, (3) a tendency to 'blow up' under pressure, (4) maladjustment to law and order, and (5) recidivism.

- **Feeling:** they tend to (1) be emotionally deficient, narcissistic, callous, inconsiderate, and unremorseful, generally projecting blame on others, (2) have hair-trigger emotions, exaggerated display of emotion, and be irritable and impulsive, (3) be amoral and (4) worry, but do nothing about it.

- **Thinking:** they display (1) defective judgment, living for the present rather than for the future, and (2) inability to profit from experience, i.e., they are able to realize the consequences intelligently, but not to evaluate them.

Connie Vargovich's documented history of repeated accusations against many men, all complaints alleging 'physical abuse', 'bruising', 'injuries', 'strangulation', 'choking', 'punches', 'kicks', 'slaps', 'death threats', 'deadly weapons used against her', 'assassination threats and attempts', a 'fear for her life' and the 'lives of her family', 'swift police needed to preserve her life', boasts that 'police believe anything she tells them', etc., the many personal protections orders against men and women, multiple appearances in the courts of multiple states seeking actions against alleged assassins, murderers, and rapists, all indicates that either Connie sees more adventure than James Bond, or is suffering from mental illness.

The accusations Connie made against Don Miller and various other men and women are extremely similar in nature. They are virtual carbon copy complaints of each other, and all triggered when she comes to disagreement with the person or when the person opposes her in any way.

Connie craves the sympathy and attention that she receives from the women's organizations, police, courts, and friends, etc. None of her many prior accusations against anyone else were ever proven true in any court at any time. Connie's own mother asked police to drop charges against Don and she, Connie's brother, and older sister refused to come to trial, knowing Connie was lying.