

No. _____

**In The
Supreme Court of the United States**

Samuel H. Sloan, petitioner

v.

Creighton W. Sloan

Sue H. Roe

Aiken County Probate Court

Respondents

**On Petition for a Writ of
Certiorari to the Supreme Court
of South Carolina**

Petition for a Writ of Certiorari

**Samuel H. Sloan
1664 Davidson Avenue 1B
Bronx NY 10453**

917-507-7226

917-659-3397

samhsloan@gmail.com

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Questions Presented

1. Upon discovering through DNA testing that the presumed son of the deceased was in no way a child or a relative of the deceased but had been unofficially adopted, must the courts reopen the case where as here almost the entire assets of the deceased have already been confiscated by the unofficially adopted child and must the estate be re-awarded to the real biological son of the deceased?
2. Where upon retirement of the so-called probate judge, it has been discovered that the judge never went to law school, never graduated from college and had no qualifications whatever to be a lawyer or a judge and yet she conducted hearings, made rulings on evidence and basically pretended to be a qualified lawyer and had concealed her lack of qualifications from the parties and petitioner had many times demanded that she recuse herself, must this case be reopened and re-litigated before a real judge?
3. May a probate court in South Carolina take or accept jurisdiction over the estate of the deceased where the deceased had never had any property in South Carolina and had never lived, worked or resided in South Carolina but had built and owned her own home and had worked for her entire professional career as an official of the Commonwealth of Virginia in Richmond and Lynchburg Virginia but had been kidnapped and brought to South Carolina to get her money and estate?

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Petition for a Writ of Certiorari

Jurisdiction

The Final Decision of the Supreme Court of the State of South Carolina was signed by all five justices of that court and dated December 9, 2019

Statement of the Case

1. Dr. Helen Marjorie Sloan was born on 17 March 1910 near the family farm in Creston, Iowa. She was a child psychiatrist and a medical doctor with a distinguished career starting in 1943 as acting director of the Memorial Child Guidance Center in Richmond Virginia, as director of the Lynchburg Child Guidance Center in

Lynchburg Virginia, as Staff Director of the Virginia State Colony and Training School for Epileptics and Feeble Minded in Madison Heights Virginia and as head of the Geriatrics division of Western State Hospital in Staunton Virginia. She was called as an Expert Witness for the Commonwealth of Virginia in many criminal cases. Her biography is published in the First Edition of Who's Who in American Women.

2. Her eldest son Samuel Sloan was born in 1944 in Richmond Virginia. The second child was Creighton born on June 27, 1946 but we now suspect and believe that Creighton was not the natural son but was unofficially adopted without any proceeding or court order because at that time Dr. Sloan was director of a Home for Unwed Mothers in the same building as the Memorial Child Guidance Center in Richmond, Virginia where many children were born whose mothers did not want them and as she had the authority to issue birth certificates she could have easily taken an attractive child as Creighton was and listed herself as the mother. There are no childhood pictures of Creighton other than the two pictures included in this petition.

3. Creighton has been a sickly child all his life, often in the hospital with chronic illnesses. He has had medical difficulties all his life, failing the seventh grade, flunking out of junior college, often changing colleges, having difficulties keeping a regular job, unable to get along with co-workers, stealing and wrecking her cars, finally getting three masters degrees in dramatic arts at her expense but unable to find steady employment in that field and always relying on her for financial support.

4. Finally, when Dr. Sloan tried to cut him off, Creighton kidnapped her and took her to North Carolina where he was living at the time and then he had her pension and social security checks routed to him where he could get the money. She escaped from his home in North Carolina two times and went to her own home in Lynchburg Virginia only to have him grab her and take her back to North Carolina.

5. He hated her and often said, "I hate you with a purple passion." He said he wanted to get revenge. She was terrified of him. Finally, Dr. Sloan escaped again and went to New York City where a custody hearing had been scheduled for September 4, 1986 before

New York Supreme Court Judge Kristin Booth Glen regarding her eldest son Samuel and his two children Peter and Mary Sloan who were his children by Sam's Latvian wife Anda Baumanis of Riga Latvia. Also present was Shamema Honzagool Sloan, aged 4, born in October, 1981 by his wife Honzgool from Chitral Pakistan. However Shamema was not present in court on this day.

6. Just as the hearing was about to commence, Judge Glen's phone rang. She took the call in chambers and then came out and announced that the call was from Judge Larry Janow in Madison Heights Virginia and he wanted Sam Sloan and his mother arrested for taking Shamema out of state because the Roberts family was planning to seek custody of Shamema. Therefore, Judge Janow wanted Shamema aged 4 taken into custody by social services and rendered or extradited from New York to Virginia.

7. Judge Glen said that she had seen Shamema in court the previous day but as she was not in court on this day the child could not be detained. However, Judge Glen was calling the New York City Police to arrest Sam Sloan and his mother. Also present in court were Anda's lawyer Walter Anderocci who said he was representing Creighton Sloan too and he was planning to take Dr. Marjorie Sloan to a place where Creighton could come and get her and take her back to North Carolina. Hearing this, Dr. Sloan said, "I want nothing to do with Creighton."

8. The police arrived and took Sam Sloan and his mother to jail at the New York City police station on Elizabeth Street, the police station closest to the court. However, two hours later the police released them both saying that they had been informed by the Amherst County Virginia Commonwealth Attorney Ed Meeks that there was no warrant for their arrest.

9. This demonstrated that Anda, the Roberts and Creighton were all in contact with each other and conspiring. Realizing that Creighton and the Roberts would try again and again to get their money and the grandchild and since the Roberts were affiliated with the powerful religious group headed by Jerry Falwell in Lynchburg, Virginia who wanted to convert the child to the Christian religion, Dr. Helen Marjorie Sloan applied for and obtained passports for herself and her

granddaughter Shamema. The three of them then caught a flight to Rio Gallegos Argentina where Sam Sloan had a previous engagement as a chess coach for a team of chess players for the World Under-16 Chess Championships.

10. After the chess tournament was finished in Argentina and they were preparing to leave Rio Gallegos, it was discovered that Creighton Sloan had canceled all the credit and bank cards of Dr. Marjorie Sloan and had frozen the funds of her bank accounts, so Dr. Sloan was now left destitute and without funds.

11. Nevertheless, they three made their way to Buenos Aires Argentina and from there to Rio de Janeiro Brazil and to Asuncion Paraguay and from there to Madrid, Spain and Paris, France, not crossing the USA believing they would likely be arrested and detained if they set foot on US soil.

12. There, learning that Dr. Marjorie Sloan was in Paris France, Creighton called the police there and tried to have her detained, but she again escaped. They then went to Innsbruck Austria and from there to Budapest Hungary and from there to Dubai United Arab Emirates where the 1986 World Chess Olympiad was about to commence.

13. Sam Sloan got a job as the chess columnist writing for the Gulf News in Dubai which gave him enough income to support his mother and daughter. They wound up spending four years in the United Arab Emirates.

14. They also went to Kandy Sri Lanka where they hired two domestic servants, Dayawathie and Renuka. One of them was to take care of the elderly grandmother, the other was to take care of the daughter Shamema Honzagool.

15. On a subsequent trip in 1990, they went to Bangkok Thailand where, after visiting the Crocodile Farm, Dr. Sloan became ill and had to be hospitalized in the Bangkok General Hospital.

16. There, upon learning that Dr. Sloan had been hospitalized and knowing that she was not willing to return to the United States voluntarily, Creighton traveled to Bangkok and hired a lawyer named

Boonchoo to kidnap her out of the Bangkok General Hospital. Creighton did not visit her in the hospital or even notify her that he had been in Thailand. Creighton left Thailand and returned to USA before the kidnapping took place so he would not be implicated.

17. During the four years where they had been going from country to country, Dr. Sloan had been interviewed more than twenty times by US consular officers stationed at the countries they visited. Because Creighton had often had her pension and Social Security checks routed from her address to his address in North Carolina, she had specified that her checks would be personally picked up by herself at whatever US Embassy she happened to be near and that nobody else was allowed to receive her checks.

18. Dr. Sloan had made no secret of her whereabouts, so a US Vice-Counsel would often come to visit her in view of Creighton's allegation that she had been kidnapped and was being held against her will. In one noteworthy instance, the US Consular Officer Robert Murphy in Abu Dhabi knowing that Sam Sloan was in USA, tried to take her by force but as she was stronger than he was she had fought him off so he could not take her.

19. She knew the cruel fate that awaited her if Creighton ever got her again. Finally, Boonchoo in Bangkok Thailand kept the hospital room under surveillance and after waiting several days for a time when Sam Sloan went out of the hospital to the post office, he came in with a gang of men who injected her with knock out drugs and took her by force and overcame her resistance. Shamema Honzagool, her granddaughter, was present in the hospital room when this happened and witnessed this kidnapping.

20. Boonchoo had her wheeled out on a gurney and put unconscious on a TWA flight to America. Creighton's Uncle Cassel Jacobson paid for this kidnapping. He later testified that he had paid \$60,000 for this.

21. Arriving at Cassel's home in Silver Spring, Maryland, he had the address for both her social security check and her Virginia Supplemental Retirement System check changed from her address at the US Embassy in Abu Dhabi to his address in Silver Spring.

However, he soon found out that these changes of address would not be honored because Dr. Sloan had previously strictly instructed both agencies never to change the address for her checks because of the many times that Creighton had changed her address to his own address so he could get her money.

22. A second problem Cassel found was the nursing homes in Maryland were not willing to hold Dr. Sloan against her will or to lock her up as she was fully competent and capable of managing her own affairs, especially as she kept trying to escape.

23. Creighton Sloan had recently moved to Aiken, South Carolina, so Creighton and Cassel Jacobson devised a plan to transfer her to South Carolina especially after learning that South Carolina Law would allow her to be held in a "closed room" as Cassel Jacobson testified before Judge Sue H. Roe, which Maryland law would not allow.

24. Dr. Sloan was brought to South Carolina where Probate Judge Sue H. Roe, without holding a hearing or proceeding of any kind and without any notice to her or to Sam Sloan, who by then was back living in his mother's house at 917 Old Trent's Ferry Road in Lynchburg Virginia with his two domestic servants from Sri Lanka, Dayawathie and Renuka and the by then their three children, detained her. Learning that Cassel Jacobson had been unsuccessful in changing the mailing address for the Social Security Checks and Virginia Supplemental Retirement System checks from her address in Abu Dhabi to his address in Maryland, "Judge" Roe ordered that the checks be sent to Creighton's address instead.

25. Under the law of South Carolina and the law of every other state, for a person to be found incompetent and have their rights taken away, there must be medical examinations and testimony by qualified doctors and psychiatrists and there must be notice and the opportunity for a hearing to all of the children. None of this was done.

26. Moreover, in this case, "Judge" Roe specifically ordered that the eldest son Sam Sloan NOT be notified. During this entire time, Sam Sloan was searching for his mother. The last time he had seen her was just before she had been kidnapped out of the Bangkok General

Hospital. He did not even know to which state or country she had been taken. She might have been taken to Sri Lanka or to Virginia or to Iowa.

27. Eventually, after searching for three months, he found out from the police that she was being held in Aiken South Carolina but by order of Judge Roe he was not allowed to see her. He was not allowed to see her nor was she allowed to see him. Under South Carolina Law a hearing must be held once a year to determine if her condition has improved. No such hearing was ever held. Sam Sloan never received any notice of the conditions or of the whereabouts of his mother nor did he ever receive correspondence of any kind from Judge Sue H. Roe or the Aiken County Probate Court.

28. Sam Sloan was one time able to get into the prison-like facility where she was being held. One time four years later in May 1994, this happened after she had been kidnapped by Boonchoo in September 1990, Sam Sloan got in because the Staff of the Mattie C. Hall Health Care Center in Aiken South Carolina thought he was Creighton. He was able to get in and speak to his mother for the first and only time since she had been kidnapped in Bangkok and to observe her walking around the facility testing all the windows and doors trying to see if she could open them and escape.

29. When the staff of the Mattie C. Hall Health Care Center realized Sam was not his brother, he realized had better get out. The staff of Mattie C. Hall Health Care Center stopped his mother from leaving with Sam and blocked her departure at the door. Sam got into his car and drove out of town but soon the Aiken police cars surrounded him and stopped his car, having been called by Creighton. But they did not arrest him. Instead they detained a young woman named Kerry Durney who was a passenger who had been waiting in his car.

30. Dr. Helen Marjorie Sloan died on 16 May 2002 at age 92, having been held in the Mattie C. Hall Health Care Center for 13 years. Creighton had taken all her pension and social security checks and all her bank accounts in Lynchburg. No accounting of funds has ever been provided but altogether it must have been one to two million dollars. The case of "Helen Sloan" in Aiken County Probate Court

does not even mention she has a son named Sam.

31. It is astounding that Petitioner's mother was psychiatrist director of the Virginia Department of Mental Health and Hygiene and the Memorial Child Guidance Clinic at 3001 Fifth Avenue, Richmond, VA 23223 and then nevertheless she was kidnapped in Bangkok, Thailand and taken to Aiken South Carolina where she was never allowed to return to Virginia and held prisoner in the Mattie C. Hall Health Care Center for 13 years until her death at age 92.

32. The judge who ordered petitioner's mother locked up was Sue H. Roe. It was not until the retirement of Judge Roe was announced in May 2016 at https://www.scstatehouse.gov/sess121_2015-2016/bills/1326.htm that Petitioner and others discovered that Sue H. Roe had never graduated from college, had never been to law school, had never passed the bar examination and had never practiced law or met the qualifications to be a lawyer and yet she had conducted hearings, made rulings on evidence and pretended to be a qualified lawyer.

33. Petitioner has been to Aiken South Carolina where he attempted to copy the case file only to discover that virtually the entire case file including any evidence, pleadings and rulings made by "Judge Roe" have been shredded or have disappeared. This is in violation of South Carolina law that requires that court records be preserved.

34. It was not until after the subsequent retirement of Judge Sue H. Roe that it became known that Judge Roe was not a lawyer. She had never been to law school. She never took the bar exam. She was and is completely unlearned in the law. This explains why she did not understand the legal requirements that a person cannot be detained unless she is a danger to herself or a danger to others.

35. Ironically, Dr. Marjorie Sloan knew the law on this point very well, because she was THE AUTHORITY on this law in Virginia. She was an official of the Commonwealth of Virginia. She has been called as an Expert Witness for the Commonwealth in many criminal cases. All the judges knew her. It had often been up to her to decide which prisoners went free and which were to be locked up in jail or in

a psychiatric hospital. She could order a prisoner released or kept detained.

36. Petitioner has recently been to Aiken South Carolina and has ordered copies of the case file. Petitioner has found that there is nothing to copy because the file is virtually empty. Petitioner does not know if "Judge" Roe ordered the file to be shredded. Now there is almost nothing there. There used to be an order by Judge Roe that petitioner remembers reading, but that order is not in the file.

37. After discovering that almost the entire case file had disappeared, Petitioner wrote a letter to the new Probate Judge Tonya L. Marchant, who is also not a lawyer, asking an explanation for the fact that many documents had disappeared from the file including letters written by Dr. Marjorie Sloan herself complaining that she had been locked up and held without notice and a hearing.

38. The only response to this letter has been a form type letter from the court suggesting that Petitioner should hire a lawyer.

39. Petitioner had filed many petitions and even cases in federal court, Sam Sloan vs. Sue H. Roe, 92-CV-02388-RJD-MDG, and had set up a website and email group and had attended so called hearings in the Aiken County Probate Court and appealed from one of the orders. Judge Rodney A. Peebles heard the appeal but said that Judge Roe "is a fine. Fine" probate judge. Petitioner is not aware whether Judge Peebles knew that Judge Roe was not a lawyer and not a proper judge.

40. Judge Peebles said he has played over the tapes taken in hearings before Judge Roe. Those tapes cannot be found. Petitioner has tried to order text or transcripts of the tapes but been unable to obtain these tapes or the transcripts if any of the tapes. There is a sign posted on the Aiken County courthouse wall saying Judge Peebles is a business partner of Judge Roe. This was improper as Judge Peebles should have recused himself.

41. It is not possible to bring Petitioner's mother back to life or to restore the 13 years she lost by being kidnapped and held prisoner.

42. The Sloan Family had lived almost their entire lives in

Lynchburg or Richmond Virginia. They had never resided in or even visited South Carolina. Sam Sloan has been appointed by the Lynchburg Circuit Court as the administrator of the estate of his father Leroy B. Sloan, an attorney and Special Agent for the Internal Revenue Service and for the United States Treasury Department.

43. The time to appeal an order of the Aiken County Probate Court is only ten days. Because Petitioner lives in Bronx New York, by the time he has received an order and attempted to file a notice of appeal, the ten days has expired. Petitioner has asked for extensions of time which have been denied each time so petitioner has never been able to have a proper appeal heard.

44. After attending the ISHI Conference, the The 30th International Symposium on Human Identification in Palm Springs California September 23-26, 2019 in Palm Springs California, petitioner realized he could establish whether Creighton Sloan is really his brother or not. If Creighton is not his brother and not the real son of Dr. Marjorie Sloan, then all the property Creighton Sloan has taken including all the bank accounts, the contents of the safe deposit boxes, the house, the land and all the property Creighton Sloan has taken must be returned to Sam. Accordingly Petitioner Sam Sloan filed a letter appeal dated 28 March 2019 to the South Carolina Court of Appeals which brings this case before this court.

45. Petitioner has received a decision of the South Carolina Supreme Court signed by all five judges of the South Carolina Supreme Court dated December 9, 2019 incorrectly naming the case Sloan vs Sloan in the matters of the estate of Helen Marjorie Jackson Sloan letter to the court dated March 28, 2019 Appellate Case No. 2019-000452 in which the petition was denied. This gives this court jurisdiction over this petition for a writ of certiorari. A copy of the order of the South Carolina Supreme Court is annexed.

46. Petitioner has taken ALL the available DNA tests including familytreeDNA, Ancestry, 23andme and Myheritage and has uploaded the results to Gedmatch. These test results and the DNA test results of his paternal cousin Jack Sloan and the children of his maternal cousin Richard Jacobson establish that Sam Sloan is the real son of Dr. Marjorie Sloan.

47. However, Creighton Sloan and his children have been asked but have failed and refused to take any of the DNA tests. This creates the presumption that he knows the tests will show that he is not the real son of Dr. Helen Marjorie Sloan. He apparently long ago realized that he was not really the son of Dr. Marjorie Sloan as he refers to her as "Mrs. Sloan" and never calls her his mother.

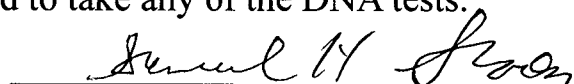
48. The last will and testament of Dr. Helen Marjorie Sloan is not in the court file and is presumed lost.

49. This brings up an issue that needs to be resolved by this court because studies have shown that 17% of the people who take these DNA tests find out that the person they thought was their father was not their real father. There are bound to be a lot of cases like this coming through the courts and these are issues this court should take.

50. Creighton Sloan said many times that he wanted to get revenge on her. She said many times that she considered the greatest accomplishment of her life to be that she designed and built her own house in Lynchburg Virginia, so she could live out her old age there. She never would have agreed to sell the house. He refused to spend the night in her house and never entered there except to grab her and drag her out. He got part of his revenge by having had the house sold for essentially nothing as virtually all the proceeds went to pay his attorneys. An added factor in that Dr. Helen Marjorie Sloan was NOT a resident of Aiken South Carolina. She was kidnapped and taken there by force. She had never been there before. This can be readily established by a Freedom of Information Act Request, as the twenty different US Consular Authorities who interviewed her in various countries of the world during her 1986-1990 world travels no doubt made and kept reports of her whereabouts, as well as did the FBI that was often called about her case or cases.

CONCLUSION

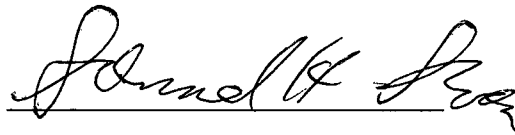
For All of the Reasons Set Forth Above, This petition for a Writ of Certiorari Should be Granted and in addition Creighton Sloan should be ordered to take any of the DNA tests.

A handwritten signature in cursive script, appearing to read "Samuel H. Sloan", is written over a horizontal line.

Samuel H. Sloan

Verification

Samuel H. Sloan, being duly sworn, states that he is the Petitioner herein; that he has read the foregoing Petition for a Writ of Certiorari and knows the contents thereof; that the same is true to his knowledge except as to those matters stated to be alleged upon information and belief, and as to those matters he believes them to be true.

A handwritten signature in cursive script, appearing to read "Samuel H. Sloan", written over a horizontal line.

Samuel H. Sloan

Sworn to before me this 12th
day of March, 2020

NOTARY PUBLIC