

FEB 18 2020

OFFICE OF THE CLERK

19-8917
No. _____IN THE
SUPREME COURT OF THE UNITED STATESMelody Jackson Hale PETITIONER
(Your Name)Indiana Department of DCS
Child protective services — RESPONDENT(S)ON PETITION FOR A WRIT OF CERTIORARI TO
United States Court of Appeals
for the Seventh Circuit, Chicago, Illinois 60604
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Melody Jackson Hale
(Your Name)2947 N 775 E
(Address)Elwood, IN 46333
(City, State, Zip Code)574-377-2090
(Phone Number)

ORIGINAL

QUESTION(S) PRESENTED

- ① How can a Caseworker hold you against you will at local hospital after child birth & see and use the local police department for intimidation in order to take your child before from hospital. With the use of threat & intimidation, coercion,
- ② How can CPS/DCS Caseworker lie & falsify documents & violate your Constitutional rights to remove your babys by force
- ③ How can Indiana DFSS/CPS/DCS take your child by force, NO warrant, NO court order, NO probable cause
- ④ How can CPS get away with violating Due process rights of a parent in order for them to terminate your rights to adopt out your children

I received a letter from Terri Stigden,
Indiana DCS Director

I had then filed a tort claim against
Indiana DCS-Warsaw, Ind DFSS/CPS & a 1983 packet
federal court did & maybe able to file in state court
that I may have a case. I would like to see
something done ~~first~~ & hold the one accountable
that done me & my family leniently!

March 20, 2020 Thank you
mildred Hall Jackson

LIST OF PARTIES

- All parties appear in the caption of the case on the cover page.
- All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

Federal Case # 119-cv-01197 TWP - MJD

Indianapolis ~~Federal Court~~

Case # 19-2517 (7th Circuit)
Chicago

I would like to see the
Mandate lifted. So we can settle
this case. ~~Demand~~

TABLE OF AUTHORITIES CITED

CASES	Federal Case #	PAGE NUMBER
	119 119-CV-01197 TWP-MJD	
7th Circuit	Case # 19-2517	
	-Chicago-	

STATUTES AND RULES

OTHER

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

[] For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

- [] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

- [] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

[] For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

- [] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

- [] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was Jan 30 11 2020.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**:

The date on which the highest state court decided my case was _____. A copy of that decision appears at Appendix _____.

A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

* My Fourth Amendment in the U.S. Constitution
the right of the people to be secure in their persons
houses, papers and effects against unreasonable
Searches & Seizures

* Requirements for a Valid Search Warrant *

See Carr v. United States 267 U.S. 132 (1925)

* Civil of law 18 U.S. Code § 242 - Deprivation of Rights under Color
of Law Title 18, USC. Section 242

My 14th Amendment XIV - Section 1 - No state shall make or enforce
any law ~~which~~ which shall abridge the privileges or immunities of
citizens of the United States - NOR shall any state deprive any person
of life liberty or property without due process of law ratified in 1868

Amendment #5 - Protection of Rights to life liberty & property

Amendment #6 - Rights of accused person in Criminal Case

Amendment #7 - Rights in Civil Case - (I was denied my day in
Court)

Amendment #8 Excessive Bail, Fines & Punishments

(No cruel & unusual punishment inflicted)

Amendment #9 Other Rights Reserved by the people

The Constitution of certain Rights shall not be
Construed

* STATEMENT OF THE CASE *

Division of Child Services forcefully removed my baby's
Pal Delware b/ras 1-20-95 - James Alexander 6-10-94
Pal was taken ~~up~~ just of mrs old Cps Case Worker just wanted
to see Pal so I took them into Cps office for a visit and then the
Case Worker was threatening him and told me to go ahead and
because that I wasnt getting him back! no court order / no warrant
no probable cause! Then I demand the reasons why she did this
Well she stated sense I was pregnant that I couldnt raise to baby's
then she give me a case plan I had to do parenting classes -
and so on I completed everything that was asked of me
(see Cera Report enclosed) then I had James and the dr was
going to release me & my son, and that day 6-13-96
CPS - Case Worker came into (PCH - local hospital in Akron, IN)
and took my son by force I had a C-Section for both children
and the Case Worker went as far as telling me she would give my
son back to me after she took them to then dr. Case Worker wanted
to see if James was a failure to thrive - this dr appointment
was on - 6-18-96 and as soon as James was not found to be
a failure to thrive Paid Case Worker then filed a Child case on
unsubstantiated evidence and kept my son for ~~about~~ a
month or better then give him back to me a month or so
later. Then again like with Pal Case Worker calls me so
she could see James. I bring James (& showing good faith) into Cps
office. then Case Worker takes him with local law enforcement
like with Pal: no warrant, no court order, no probable cause,
with use of coercion, threats, intimidation!

REASONS FOR GRANTING THE PETITION

Judge David Cates in Warsaw, Indiana Granted me access to the Chem file case # 43D01-9406-JC-155 Kosciusko County, Warsaw, IN 46580 - Earl Delwayne - 43D01-9711-JM 205- the only hearing I had for either one of my boys was a Denial hearing "What I had to do to get them home) see attached forms Case Report.

Everytime I exercised my rights the Case Worker in Stienbarger would stop my visits!

Adoption file Case # is 43D01-9506-JC-114 filed on Oct 28th 1996 Just 3 month after the Case Worker forcefully took James Alexander & my Constitutional Rights were violated in order for this Case Worker to take James, & adopt out my boys, NO Attorney in Warsaw, Indiana would go against CPS - which they were pretty worked for them! I had my home, job, and paid all my bills without living off the state! my boys had any & everything ever made for what even a child would need! Food, Clothing, Shelter, & if not for most a Mother-mom that loves them both very much & unconditionally! Im not the only one whos had these kind of issues with DCS/CPS for the state of Indiana publishing documents! its like every few months DCS/CPS ~~is on~~ of Indiana is on the news! and under investigation to been 25 years for me dealing with PTSD. & so on because of what they did. Every day that goes by isnt easy! I was discriminated against

as a parent & my Constitutional Rights were violated in order for DCS/CPS to forced Adoptions - on what is and to wrongfully remove my boys! Stop Forced Adoptions! ~~parent~~ maybe & ASSumptions!

Indiana Gov Eric Holcomb Speaks at a Conference in 2017- Indiana had 29,315 children in foster care during 2016 - according to federal data from the Administration for Family & Children. Those speaker Karen Bosma- Indiana has 17 more kids-children in foster care in the surrounding states. and what about DCS of Indiana law suit filed on behalf of children Indianapolis, DCS/CPS somethings have been going on with DCS for a very long time and I can't give up my fight for my boy ever! CBS 4 INDY 6 month review of issues on DCS June 18th 2018 there has been along history of issues with DCS I'm sure that there is more parents like me!

Sincerely
Melody Jackson Hale thank you for listening.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Melody Jackson Hale

Date: 2-14-2020