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20-1718
No. _____

In the
Supreme Court of the United States

SAMUEL H. SLOAN,

Petitioner,

v.

MARIA CHILDRESS, SHAYAM RAMAN, SUSAN SWECKER,
CHRIS BOLLING, MARK HERRING, RALPH NORTHAM,
LAWRENCE JANOW, J. MICHAEL GAMBLE, WILLIAM G.
PETTY, FRANK G. DAVIDSON III, NORMAN K. MOON,
CHARLES EDWARD ROBERTS, DARRELL JAY ROBERTS,
WILLIAM P. BARR, UNITED STATES DEPARTMENT
OF JUSTICE, UNITED STATES OF AMERICA,

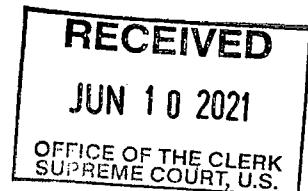
Respondents.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for Fourth Circuit

PETITION FOR A WRIT OF CERTIORARI

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JUNE 7, 2021



QUESTIONS PRESENTED

1. Where the questions of the custody of a child have been decided by the Supreme Court of New York State, when may a family court of a county in Virginia take jurisdiction over a case and award custody of the child to unrelated third parties?
2. Where the Virginia Supreme Court has disqualified a judge from hearing the case and the judge hears and purports to decide the case anyway what is the legal effect of the judges orders?
3. Where a child has been kidnapped from a foreign country and brought into the jurisdiction, and a Virginia judge was directly involved in the kidnapping of the child, is the judge immune from suit and may the judge award the child to unrelated third partied.
4. Where as here the Amherst County Commonwealth Attorney has decided that the courts of Virginia have no jurisdiction over the matter of the custody of a child, and has dismissed the proceedings brought in that county, may a Lynchburg judge take jurisdiction over the child and award it to unrelated third parties?
5. Where both of the parents of a child are devoted followers of the religion of Islam may a Virginia court order that the child be enrolled in a Christian church and school for the purpose of changing the religious beliefs of the child?
6. Where the parents of the child object to enrolling the child in a Christian religious school and rather insist that the child attend general public school and

the wishes of the parents are ignored what is the legal effect of the education of the child?

7. Where as here the child has only attended schools affiliated with Jerry Falwell and those schools are not recognized by the Virginia Department of Education, is a diploma issued by those schools legally valid and may the child attend higher education?

PARTIES TO THE PROCEEDINGS

Petitioner

- Samuel H. Sloan

Respondents

- Maria Childress
- Shayam Raman
- Susan Swecker
- Chris Bolling
- Mark Herring
- Ralph Northam
- Lawrence Janow
- J. Michael Gamble
- William G. Petty
- Frank G. Davidson, III
- Norman K. Moon
- Charles Edward Roberts
- Darrell Jay Roberts
- William P. Barr, United States Department of Justice
- United States of America

LIST OF PROCEEDINGS

United States Court of Appeals for the Fourth Circuit
No. 20-1566

Samuel H. Sloan, *Plaintiff-Appellant*, v. Maria Childress; Shayam Raman; Susan Swecker; Chris Bolling; Mark Herring; Ralph Northam; Lawrence Janow; J. Michael Gamble; William G. Petty; Frank G. Davidson, III; Norman K. Moon; Charles Edward Roberts; Darrell Roberts; Jefferson Beauregard Sessions III; United States Department of Justice, *Defendants-Appellees*.

Date of Final Opinion: October 26, 2020

Date of Rehearing Denial: January 8, 2021

United States District Court for the Eastern District
of Virginia Richmond Division

Civil Action No. 3:18cv260

Samuel H. Sloan, *Plaintiff*, v. Maria Childress, Et Al., *Defendants*.

Date of Final Opinion: September 6, 2019

Date of Rehearing Denial: May 14, 2020

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PETITION FOR A WRIT OF CERTIORARI

Petitioner, Samuel H. Sloan, respectfully petitions for a writ of certiorari to review the judgment of the United States Court of Appeals for the Fourth Circuit in this case.



OPINIONS BELOW

The Opinion of the United States Court of Appeals for the Fourth Circuit was entered on October 26, 2020. (App.1a). The Memorandum opinion of the United States District Court for the Eastern District of Virginia was entered on May 14, 2020. (App.22a). These opinions have not been designated for publication.



JURISDICTION

A timely petition for rehearing was denied by the United States Court of Appeals for the Fourth Circuit on January 8, 2021. (App.55a). This Court has jurisdiction under 28 U.S.C. § 1254(1). This Court, on March 19, 2020, extended the time to file a petition for writ of certiorari to 150 days following the entry of a final order in the appeals court.

STATEMENT OF THE CASE

Petitioner Appellant and his family did not ask, petition or apply to come here to USA. We were kidnapped or rendered or brought here by force after the respondents spent years chasing us from country to country believing they could get our money, property and especially the children of petitioner. Plaintiff and his family are Muslims and the respondents wanted to get these children to convert them to Christianity and enroll them in the Jerry Falwell Schools in Lynchburg Virginia. This case follows the trend of the USA to claim long arm jurisdiction over the entire world and to reach out and bring us back alive.

Dr. Helen Marjorie Sloan, mother of petitioner, was a distinguished medical doctor and child psychiatrist. Her biography is published in the First Edition of WHO'S WHO IN AMERICAN WOMENH. In 1990, she was kidnapped out of her hospital room in the Bangkok General Hospital in Bangkok Thailand where she was suffering from pneumonia, bronchitis and high fever. She had previously been director of a psychiatric hospital in Virginia. She had also been director of the Florence Crittenton Home, a home for Unwed Mothers, and director of a hospital for near Lynchburg called the Virginia State Colony for Epileptics and Feeble-minded.

She had to leave all that behind when she realized she was in danger from these defendants and made a run for it.

After being on the run for five years mostly in the United Arab Emirates, she was brought back and

held in Aiken, South Carolina where she had never been before without any notice or opportunity for a hearing and with no summons and complaint or judicial process.

The children of Petitioner Appellant were kidnapped brought back. They were awarded custody to non-relatives without any normal process. The mother of one of these children then escaped with her daughter to California. She too was hunted down. Tragically, her daughter died after being detained for a year and she blames these defendants for her daughter's death.

These things happened because these defendants were operating under the mistaken belief that Petitioners family was wealthy. They believed this because of a coincidence in names. Alfred P. Sloan Jr. had been the richest man in the world when he died in Sloan Kettering Hospital in 1966 because he was Chairman and Control Stockholder of General Motors Corporation, the largest industrial company in the world. The elder Sloan, Leroy B. Sloan, who had been an attorney and was Special Agent of the United States Treasury Department and Auditor for the Internal Revenue Service. As long as he was alive, the family was protected from these defendants because they feared the power of the IRS. But immediately after he died, the same attorneys started litigation to get everything. The elder Sloan had liked to brag that he was related in some way to that famous man, Alfred P. Sloan, but the Sloan Family here has no known relationship to that Sloan. The wide-spread rumor was the Sloan Family here had net assets of over \$50 million. It was this mistaken belief that the defendants could get this money that caused these defendants to chase after them for years.

This case follows the trend of many who find they have to leave this country and escape to enjoy the normal benefits to which they are entitled in retirement. The district court dismissed this case on the ground that three of the defendants are judges. However, none of those judges had ever been assigned any case or had acquired jurisdiction. There was never normal service of process or normal hearing over any of these cases. These were judges in name only.

Petitioner happens to have been a close personal friend of Bobby Fischer, the world chess champion. Fischer too, like so many others, had to flee the country. He died after five years in exile. We never found what if anything he was accused of doing. His was just one of the many thousands of increasing cases where people find they have flee the USA and go to Canada or elsewhere to escape the jurisdiction.

In the district court, the defendants argued that the defendants are being accused of crimes including kidnapping but only the U.S. Department of Justice can bring such charges which are therefore invalid.

The Court of Appeals and the District Court below have ignored the basic indisputable facts which are established by the more than one thousand pages of documents which were submitted as exhibits in this case when this case was filed in district court and in a related Petition for a Writ of Certiorari from the Supreme Court of South Carolina more recently filed in the United States Supreme Court as *Sloan v. Sloan*, Petition for Certiorari Case No. 19-1190, which state that the daughter of Plaintiff-Appellate and the mother of Plaintiff-where both kidnapped by essentially these same group of defendants. The mother of Plaintiff-Appellant was Dr. Helen Marjorie Sloan, who was a

distinguished medical doctor and child psychiatrist whose biography is published in the First Edition of WHO'S WHO IN AMERICAN WOMEN. She was kidnapped out of her hospital room in the Bangkok General Hospital in Bangkok Thailand where she was recovering from pneumonia and high fever. She had filed suit against much the same defendants in the Lynchburg Circuit Court in Lynchburg Virginia alleging among other things that they were conspiring and planning to kidnap both herself and her granddaughter Shamema Honzagool Sloan, then aged 8, and lock her up take all her money and award custody of her granddaughter to the family of Charles and Shelby Roberts, followers of Jerry Falwell.

She had become aware of this plan and conspiracy because at a court hearing before Judge Kristin Booth Glen of the New York Supreme Court on or about September 5, 1985, Judge Glen announced that she had just received a phone call from "Judge Larry Janow" of the Amherst County Virginia Family Court alleging that the granddaughter Shamema Honzagool Sloan had been kidnapped by taking her out of the Commonwealth of Virginia and by taking her to New York.

Judge Janow had NOT informed Judge Glen that the child had been born in New York and the question of the custody of the child had long since been decided by Bronx New York Supreme Court Justice Anthony Mercorella, who had awarded custody of the child to the natural mother of the child, Honzagool, "for as long as she remains together with the child in the state of New York" with visitation to the father.

However, the mother had not remained together with the child in the State of New York. Instead the mother had fallen under the control of a group of

militant Pakistanis who had come to USA on student visas. Anybody who reads the newspapers knows how dangerous these Pakistani militants are, as they think nothing of killing people. They were planning to marry Honzagool to one of themselves, ignoring the fact that she was already married to plaintiff. This was because photographs of the mother had been published in the newspapers in Pakistan and in New York and it was said that she was the most beautiful woman in Pakistan.

Learning about the dire situation of Honzagool, her distant cousin, Prince Siraj-ul-Mulk of Chitral who was also a Commercial Airlines Pilot with Pakistan International Airways, came to the USA, interviewed Honzagool in her own native language of Khowar and agreed to her request take her back to her mother's house in Pakistan.

Learning that Honzagool had come under the complete control of a dangerous group of Pakistani militants, the Prince of Chitral pretended to agree with their plan to marry Honzagool to one of them, but said that she wanted to consult with her mother first. The militants agreed with this. The Prince had her brought to JFK Airport. He got her on the airplane but just then the militants realized they were being tricked and said she could not leave because of the court order. Just in time, Prince Siraj shut the door to the airplane and took off, as he was the pilot. Honzagool has never since returned to USA to this day. The names of the Pakistani Militants controlling Honzagool have since been put on the U.S. State Department Watch List, so they cannot come or return to USA anymore.

Knowing that these Pakistani militants were dangerous and searching for the child in both New

York and Virginia, Plaintiff hired Shelby Roberts, a follower of Jerry Falwell, as a baby sitter, to care for the child in part because Falwell is known to be hostile to Muslims and would not give the child to them. The problem that developed was the husband of Shelby Roberts, who was Charles Roberts, a disturbed man, decided he wanted the child. Frank Davidson III, the attorney for Charles, informed Plaintiff that Charles was interested in getting custody. Plaintiff informed Davidson and Roberts in unequivocal terms that under no circumstances would either of the parents of the child agree to allowing Charles Roberts to have custody.

On August 24, 1986, when the child was turning four years old, Plaintiff went to Paul Monroe School, the closest elementary to the Sloan Family Home at 917 Old Trent's Ferry Road in Lynchburg, Virginia, to enroll his daughter in that school. It happened by chance that Frank G. Davidson III came there the same day to enroll his own adopted children in that same school. Finding that Plaintiff was enrolling his daughter in that school, and not in a Jerry Falwell Approved School, Davidson went to the Amherst County Family Court and without notice or a hearing got an immediate order from Judge Janow that "allowed" Shamema to be enrolled in the Temple Baptist School.

This was entirely unacceptable because Plaintiff is not a member of the Temple Baptist School nor is he a member of the Thomas Road Baptist Church and both of the parents of the child are Muslims.

Recognizing that they were in a dangerous situation with even the potential for violence from Charles Roberts, Plaintiff took his mother and daughter immediately to New York. His mother, the grandmother of

the child, was anxious to leave. There a hearing had previously been scheduled before Judge Kristin Booth Glen regarding the custody and visitation with Plaintiff's two years older children, Peter and Mary Sloan whose mother, Anda Baumanis of Riga, Latvia, was not in compliance with a previous custody order.

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 the state of Virginia 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.

Judge Kristin Booth 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. Hearing this, Dr. Marjorie Sloan said, "I want nothing to do with Creighton."

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 courthouse. However, two hours later the police released them both saying that they had been informed by the Amherst County Virginia Commonwealth Attorney that there was no warrant for their arrest.

Realizing that defendants 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 their version of 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 the Polgar family team of chess players.

After the chess tournament was finished in Argentina and they were preparing to leave, it was discovered that all the credit and bank cards of Dr. Marjorie Sloan and had been frozen and the funds of her bank accounts were not available, so Dr. Sloan was now left destitute and without funds.

Nevertheless, they three made their way to Buenos Aires, Argentina and from there to Brazil and to Asuncion, Paraguay and from there to Spain and France. That route was chosen so they would not land in or cross the USA, just in time as defendant Bill Petty had sent a police officer to arrest them at Miami Airport.

There, learning that Dr. Marjorie Sloan was in Paris France, the police were called there and tried to have her detained, but she again escaped. The Sloans 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.

Sam Sloan got a job as the chess columnist 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.

They also went to Kandy, Sri Lanka where they hired two domestic servants, Dayawathie and Renuka, who are still with us to this day. One of them was to take care of the elderly grandmother, the other was to take care of the daughter Shamema Honzagool.

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 with pneumonia and high fever.

There, upon learning that Dr. Sloan had been hospitalized and knowing that she was not willing to return to the United States voluntarily, defendants hired a lawyer named Boonchoo to kidnap her out of the Bangkok General Hospital.

During the four years where they had been going from country to county, Dr. Sloan had been interviewed more than twenty times by various U.S. consular officers stationed at the countries they visited. Because previously her pension and Social Security checks had been routed from her address to an address in North Carolina where Creighton resided, she had specified that her checks would be personally picked up by herself at whatever U.S. Embassy she happened to be near.

Dr. Sloan had made no secret of her whereabouts, so a U.S. Vice-Counsel would often come to visit her in view of the allegation by defendants that she had been kidnapped and was being held against her will. In one noteworthy instance, the U.S. 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.

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, he came in with a gang of men who injected her with knock out drugs and took her out by force and overcame her resistance. Shamema Honzagool, her granddaughter, was present in the hospital room when this happened and witnessed this kidnapping.

Boonchoo had her put unconscious on a TWA flight to America. Defendants later testified that he had been paid \$60,000 for this.

Arriving in Silver Spring, Maryland, they tried to have address for both her social security check and her Virginia Supplemental Retirement System check changed from her address at the U.S. Embassy in Abu Dhabi to their 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.

A second problem 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.

So they 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, which Maryland law would not allow.

Dr. Sloan was brought to South Carolina where Probate Judge Sue H. Roe without holding a hearing 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 they 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 an address in Maryland, "Judge" Roe ordered that the checks be sent to the defendant's address instead.

Meanwhile, the case Dr. Marjorie Sloan had filed in the Lynchburg Circuit Court in Lynchburg, Virginia had been assigned to Judge Ballou. However, the defendants were able to get signed documents signed by Dr. Sloan agreeing to dismiss the case she had filed. These signed documents were then filed in court. She believed that by signing these documents, she would be released from their custody. But this did not happen. They kept her locked up. She remained locked up in Aiken South Carolina for 13 years until she died at age 93.

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 for all of the children. None of this was done.

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 what state or country she had been taken to. She might have been taken to Sri Lanka or to Virginia or to Iowa.

Eventually after searching for three months, he found out 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. Also 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.

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 his brother. He was able to 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 to see if she could open them and escape.

When the staff of the Mattie C. Hall Health Care Center realized Sam was not his brother, he realized had better get out. His mother tried to leave with him

but was stopped by the staff. He 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 in his car.

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. All her pension and social security checks and her bank accounts in Lynchburg were gone. No accounting of funds has ever been provided but altogether it must have been one to two million dollars.

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 200 North 22nd Street, Richmond, VA 23223 and then nevertheless she was kidnapped in Bangkok, Thailand and taken to Aiken South Carolina where she was held prisoner in the Mattie C. Hall Health Care Center for 13 years until her death at age 92.

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 basically pretended to be a qualified lawyer.

Ironically, Dr. Marjorie Sloan knew the law on this point very well, because she was THE AUTHORITY on this law in Virginia. As she was an official of the Commonwealth of Virginia, 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.

After Dr. Helen Marjorie Sloan had been kidnapped out of the Bangkok General Hospital, Boonchoo had plaintiff arrested. However, a fellow chess player bailed Plaintiff out of jail just in time as Boonchoo was coming back to detain the three Sloan children, Shamema, Michael and Jessica. Plaintiff took the three children to the town of Mae Sai, most Northern Point of Thailand, and left them with some Burmese ladies who agreed to take care of them in Burma. As Burma was then a closed country, Plaintiff found some people smugglers who were then in the regular business of smuggling people across international borders. With their help, Plaintiff was able to smuggle himself and the three children and one of their mothers into Malaysia. There they caught a flight back to Dubai, United Arab Emirates.

There they seemed to be safe as they had previously lived four years in the United Arab Emirates. But Boonchoo had contacts in the United Arab Emirates and when plaintiff got home in Fujairah after a long and exhausting trip, he fell into a deep sleep. When he woke up, the three children were gone. They too had been kidnapped.

One child, Michael, was found in the Abu Dhabi Police Station. The other two, Shamema and Jessica, had been taken to the home of Charles and Shelby Roberts in Madison Heights, Virginia. All this time

the Roberts had been claiming that they had legal custody of Shamema, but this was not true. No petition had been filed, no court hearing had been held, and they had no claim, none whatever, to custody of these children.

Plaintiff was told by Rick Groff, the social worker of the Amherst County Department of Social Services that he could just come by the Department of Social Services offices and pick up his daughter Shamema who would be waiting for him. But when he arrived at the Social Services Offices, Plaintiff was arrested by an order that had just been issued by Judge Janow.

Plaintiff based Jurisdiction of this case the First, Fifth and Fourteenth Amendments to the Constitution of the United States including Freedom of Religion, the Civil Rights Acts including 42 U.S.C. § 1983, the Voting Rights Acts, the RICO Corrupt Practice Acts, and the right to Petition the Government for a redress of grievances.

Plaintiff filed petitions to run for United States Congress for the 6th Congressional District of Virginia, which includes Roanoke, Lynchburg and most of the Shenandoah Valley. Initially, Plaintiff was ruled off the ballot because he had been convicted of the "felony" of attempted abduction of his own daughter, a charge that had been brought by defendant Bill Petty who was a deacon of Jerry Falwell's Thomas Road Baptist. However, the Governor of Virginia signed an order restoring the civil rights of Plaintiff. Plaintiff collected all the required signatures, paid the substantial filing fee and complied with all the requirements. Still plaintiff's name did not appear on the ballot. No reason or explanation had been given for this except Defendant Maria Childress told Plaintiff's campaign

manager that her "boss" told her not to allow Plaintiff's name to appear on the ballot. This is the reason the name of Maria Childress and other officials of the Commonwealth appear on the list of defendants in this case.

Neither the main defendant Maria Childress, nor any of the other defendants have said anything about this nor has the district court nor the court of appeals said anything about this. The question is whether it is not a violation of Plaintiff's constitutional rights to be denied the opportunity to run for election in Virginia. Plaintiff has in fact run for President of the United States twice appearing in the New Hampshire Primaries in 2016 and 2020.

Plaintiff contends the Virginia Felony Disenfranchisement law is unconstitutional generally and as it applies to him. Virginia is the only state left that has left undisturbed the Reconstruction Era Law that a person cannot run for office if he has ever been convicted of a felony. Plaintiff was only convicted one time and that was when Bill Petty convicted him of attempted abduction of his own daughter. That was not a felony because if it is only a felony if the child was taken out of state. That never happened because Sloan was arrested in his mother's back yard at 917 Old Trents Ferry Road and the child had never left the property. Petty based his conviction on the theory that Sloan intended to take his child out of state even though he had not actually done so.

Behind all this was the belief that the Sloan family was wealthy. This was based on the coincidence that the richest man in the world was Alfred P. Sloan Jr., who was the control stockholder of General Motors Corporation, the largest industrial corporation of the

world. Sadly, the family of Samuel Sloan, the plaintiff here, never got any of that money. Alfred P. Sloan Jr died without issue in 1966. He had no children. He left all of his money to the Sloan Foundation which now has one billion dollars in assets and to the Sloan Kettering Cancer Institute. There is no evidence of any kind that Samuel Sloan here is related in any way to Alfred P. Sloan Jr.

The Virginia felony disenfranchisement law should be struck down by this court and declared unconstitutional under *Marbury v. Madison*. This will restore the voting rights of more than 200,000 persons who have been convicted of a felony and cannot vote. Almost all of those 200,000 are Black or African-Americans because it is well known that in Virginia a Black person will be convicted whereas a White person will not be charged at all and allowed to go free. This issue has not been mentioned by any of the defendants here or by the courts. It seems that all agree that this law should be struck down.

The documents filed as exhibits with this case establish Plaintiff's claim that the Defendants-Respondents have kidnapped and taken the child who was 8 years old when she was finally kidnapped away from the natural mother and father of the child and have "awarded custody" of the child to unrelated third parties, Charles and Shelby Roberts. There was no jurisdiction for any court either in Virginia or in New York or anywhere else to have done this. The Roberts wanted this child for one reason only: Religion. The natural parents of the child, the mother, Honzagool of Chitral Pakistan, and the father, Plaintiff here, were and are devoutly religious Muslims, whereas

Charles and Shelby Roberts were Jerry Falwell Fundamentalist Baptists and Christians.

On June 9, 2020, Shamema, who is now an adult, for the first time made a long posting on Facebook about what it was like to be brought to Virginia after five years living in the United Arab Emirates with her father, the Plaintiff here. Her name is Shamema Stone now, a name she got by being married to a man named Stone. She says that she felt so embarrassed at being placed with strangers in a different country that she just stopped talking. She would only speak to Renuka and Jessica and she spoke to them in Sinhala, the Sri Lankan Language, a language she had learned after four years of living with Sri Lankans who were domestic servants. Shelby told her not to talk except in a language Shelby could understand, so she just stopped talking. She says that she hated her name that was so unusual (Shamema Honzagool Sloan) that she wanted to change it, but she liked being called Sloan because it is an Irish name. She wanted to get away from there. She says that for this reason she joined the United States Marines when she turned 18 to get away from these people. This paints a completely different picture from what the Roberts Family would have you believe from their postings here in this case. Here is Shamema's complete statement, in part in response to the notorious police killing of George Floyd in Minneapolis. There have been 71 comments thus far to this Facebook posting:

“Shamema Stone

“I don’t know what it’s like to be black in America. But please let me tell you just a tiny bit about something I do know: What it’s like to be Pakistani in America. If you are reading this, it is because you have been my coworker, my friend, or maybe even my mentor, boss, or teacher. I hope that no matter where you stand in the current political climate, you will at least hear me out. I hope you will at least read until the end. This is my personal experience.

“In 1990, when I was 9 years old, I returned to Virginia from 5 years of living predominantly in the UAE with my father. I was so painfully shy that I could barely speak out loud, even at great detriment to myself. I wanted nothing more than to fit into my new home. I just wanted to be normal.

“Virginia didn’t quite know what to make of me though. Rarely did I meet someone when they didn’t ask me a question like, “Where are you from?” “What are you?” “What kind of name is that?” “Why do you eat such weird food?”—I hated that I couldn’t just blend in. I also hated that I was Pakistani. I was so ashamed, especially because Desert Storm was brewing, and there was a lot of anti-Muslim sentiment in rural Virginia. I resented those questions so much. I was so embarrassed every time I was called out. I would respond to the best of my ability, “American!” or “Here, I’m from here.”

"I also hated my name. I cried about it often, hating the questions so much. I begged Charles & Shelby to let me change it, and when they said no, I vowed that I would change it myself as soon as I was old enough. I never corrected anyone when they pronounced it wrong or spelled it wrong. And I always said I didn't know where it came from or what it meant. (Spoiler alert: I DID.) And thankfully, I left Virginia as soon as I turned 18 or my name might be Suzanne now.

"Many of you were with me when these moments happened. When I was singled out for being different. But in all of the nine years that I lived there, not once do I recall anyone sticking up for me. Even though I was so deathly shy, even though a lot of my responses were just shrugs, not once did someone chime in, "Hey! She's with us," Or "She's one of us." Or how about, "Is that really relevant?"

"Why?

"I challenge you to pause here, and sit with the uncomfortableness. Why didn't you ever stick up for me?

"Did you just not care about me?

"Did you think, "That's not my problem"?

"Did you think I had that situation under control?

"Did you not think about me at all?

"Maybe.

"But more likely, it is because you didn't know it bothered me. You didn't know because I never told you. I. Never. Told. You.--But I'm telling you now.

"So, do I want you to say you're sorry? No. Do I want your pity? No. Do I want you to make reparations, maybe buy me a steak dinner? No. Do I want you to tell me that everyone has difficult childhoods? Do I want you to go find the voice of another Pakistani American that will make you feel better about that heavy brick I just laid on your chest? No and No.

"All I want is what I asked at the beginning. I want you to hear me out, maybe feel a little tug on your emotions, and perhaps not act like I just made that up to make you mad, or because of some political agenda that you read about on the internet. I am a real person. A person you know. It's me, Shamema. Your friend. Your coworker. Your student. Your teammate. Your fellow Marine. A person you know in real life. And this is my experience. Whether you noticed or not, that did happen. Quite regularly. It still does. It still bothers me, too.

"Maybe you didn't notice because it didn't affect you. Or maybe it was just easier to pretend you didn't notice. But you cannot deny that other people's experiences are less valid than your own just because you don't experience them.

"There is a chance that you simply don't know what it's like to be Pakistani in America, because you have never been told. There is also a chance that you simply don't know what it's like to be black in America, because you have never been told. But they are telling you now. Please, please. I am begging you.- Listen.

"Shamema Stone By the way, people still ask me these questions all the time. Now, I do say that my name and I are both Pakistani. I am ashamed that I was ever ashamed.

"Shamema Stone Yes, and I got Honzagool, so we're in pretty much the same boat. Lol. I was so distraught over my first name, don't even get me started on the middle. I still hate showing people my driver's license.

"Shamema Stone Shamema is an Arabic or Urdu name that means fragrance. Honzagool, my middle name is an Americanized version of my mother's name Khunza Gul. (Very rough translation, haha!)-You gals already know that becoming a Marine changed everything for me.

"Shamema Stone Of course. It was harrowing and painful to write, but I also know people only hear when it hits home. And now is the time for us to swing all the bats we have.

"Shamema Stone You in particular did me a great service, because I took 8 of your classes looking for the exact voice I am using today! ☺ I referenced you exactly yesterday, when I said to Amanda Susen-'Mrs Allen taught

me about this in 9th grade! It's the tu quoque fallacy."

"Shamema Stone Danielle Browitt Giiiiirl, I'm the coolest Pakistani you know! Haha. You have definitely always corrected people for me. I feel like I can still hear you screaming it in bars. Lol.-I miss working with both of you. Once in a lifetime, that crew!

"Shamema Stone Lol. It IS perfectly phonetic. You are pronouncing it correctly

"Shamema Stone Oh buddy, I love you, and I will never forget those times we shared either! I would never diminish what you guys did for me. Without a group as tight as we had, I might never have found my way. You all adopted me. And though maybe I never shared much of my past, we shared the present and that made all the difference! We gave each other the strength to survive.- I'm so glad your happy little face bopped my way through the moshpit that day. ☺

"Shamema Stone All of the forward momentum I have carried in life, I gained in the Marine Corps. I found my strength there (both types). I found my fortitude there. But most of all, I found my FAMILY there!-I love hearing from so many of you. Thank you for reaching out to me. Thank you for accepting me, then and now. And seriously, thank you for calling me Sloan, a wonderfully Irish name. Lol ☺♥

"Marsha Goodrum Daniel Wentworth Brad

Campbell Raquel Kuhfahl Kimberly Kouzios-LewisChris LangfordLinda Mihalec Deborah Black Jennifer Eadeh Katie Anderson Waldon

"Shamema Stone I also want all of you to know that I am not trying to undermine the many amazing experiences we shared. You were all my family when I felt like I didn't have one. Many of you adopted me just as much as Charles & Shelby did.-I just hope that through my experience, we can all recognize that sometimes you can stand right next to someone and have no idea what they're going through. It is not up to us to correct their perspective. It is up to us to humbly accept the times we have failed them, to wrap them in empathy, and to strive to continue improving our stance as an ally and a friend. As you are all doing for me now. I really appreciate your many kind words. I am not mad at you, I promise. I harbor no bad feelings about this. But I do know how it feels. I also know I have failed many of my friends in the same ways. Let's be better."

♥

The Roberts had tried for years to pester Plaintiff and his family to join their church, the Temple Baptist Church of Madison Heights Virginia, even sending pastors of that church, Earl Clarkson and Charles Esterline, uninvited to the Sloan Family home to try to convert them. When that failed, the Roberts resorted to crime, eventually chasing them around the world to various countries of the world to try to capture Plaintiff and his mother and all of the children and to bring them back alive. When they

finally captured this child, the Roberts determined that Shamema had been the subject of demonic possession, due to her years spent with her father. So they held an Exorcism for the purpose of evicting the demons. They also felt they needed to Baptize Shamema, so they had her head held under water for 16 seconds. This was contrary to the religion of her parents and left the child confused as to who her parents really were.

The elder Sloan, Leroy B. Sloan, was an attorney and a Special Agent of the U.S. Treasury Department and the Internal Revenue Service. He was a womanizer, with many lady friends. He used to have them drive him around in their cars. However, this became the family's downfall because one of his girlfriends, Alma Coates Dawson, claimed to have married Leroy B. Sloan on his deathbed in the Emergency Room of the Lynchburg General Hospital on New Years Eve 1974, while he was suffering from brain seizures and attached to life support equipment. Upon his death, her lawyer, the law firm of Pendleton and Gamble, renounced his will, meaning that Alma stood to get the money, if it existed, and they filed a court case against Plaintiff and his mother.

Alma believed that Leroy B. Sloan, the elder Sloan, had been left \$50 million in General Motors stock by his father, and that those stock certificates were to be found in his safe deposit box. However, the plaintiff here, Sam Sloan, knows the truth because he was and is the court appointed administrator of his father's estate. Plaintiff knew and knows that his father owned less than two hundred shares in General Motors stock and he had purchased those shares in

the monthly stock dividend reinvestment plan, and the shares were not received from an inheritance.

Alma Dawson's attorney, Pendleton and Gamble, served subpoenas on all the banks in Lynchburg, seeking access to the contents of Leroy Sloan's safe deposit boxes. What they did not know, but Plaintiff knew, was that Leroy B. Sloan did not have a safe deposit box. Plaintiff's mother, Dr. Helen Marjorie Sloan, owned the two safe deposit boxes and she had allowed Leroy Sloan to keep his stock certificates in her boxes. She almost seemed to have known what would happen.

Plaintiff's father, Leroy B. Sloan, was an attorney and a member of the Virginia State Bar. He was a special agent for the United States Treasury Department and for the Internal Revenue Service. Plaintiff's mother, Dr. Helen Marjorie Jacobson Sloan, was child psychiatrist director of the Memorial Child Guidance Clinic in Richmond Virginia, of the Lynchburg Guidance Center in Lynchburg, director of the Virginia Department of Mental Health and Hygiene, and Director of Western State Hospital in Staunton, a Psychiatric Hospital, and a Home for Unwed Mothers, which is now The Educational Development Center, GEARA Group, Inc., 3001 Fifth Avenue, Richmond, VA 23222. Some of the older employees there still remember his mother. The biography of Dr. Helen Marjorie Sloan is published in the First Edition of WHO'S WHO IN AMERICAN WOMEN.

Creighton Sloan, who we long assumed and believed to be the natural brother of Sam Sloan, was constantly ill and had difficulty holding a job. Creighton hated Dr. Marjorie Sloan and often said he was determined to get revenge on her. He always called her,

"Mrs. Sloan", never referring to her as his mother. He often said to her "I hate you with a purple passion." He would keep kidnapping his presumed mother Dr. Helen Marjorie Sloan and take her down to his home in Raleigh North Carolina. There he would re-route her Social Security check and her retirement check from the Virginia Supplemental Retirement System to his address in North Carolina, so he would get the money. At least twice, Dr. Marjorie Sloan escaped from the house Creighton had bought with her money and she returned to her own home at 917 Old Trent's Ferry Road in Lynchburg, and she then had the checks re-routed back to her own home address.

We have now established with virtual certainty that Creighton Sloan is not the biological son of Dr. Helen Marjorie Sloan. She undoubtedly got him from one of the homes for unwed mothers where she was the director including the Florence Crittenton Home and she issued a birth certificate showing herself as the mother. Prior to modern DNA testing, nobody would have ever guessed this relationship.

Dayawathe and Renuka, the mothers of the children, are still with us after all these years and are waiting for news about this case. They are anxious to testify at any court hearing about this case. They each call me every day and ask me about the progress of this case. They are both U.S. Citizens now. They voted for Trump.



REASONS FOR GRANTING THE PETITION

Defendants J. Michael Gamble, Lawrence Janow and Norman K. Moon made motions to dismiss, citing cases such as *Pierson v. Ray*, 386 U.S. 547, 553 (1967) and *Stump v. Sparkman*, 435 U.S. 349 (1978), which they say make them immune from suit as they are judges.

However, they are no longer judges, having not been re-appointed by the Virginia State Legislature, and were only immune from suit when they were sued for their JUDICIAL ACTS, within their jurisdiction. Here they did not commit any judicial acts. Their acts did not take place in any courtroom with hearings held and witnesses called, rulings made, etc. In all the allegations of the complaint, you will not see any actual court decisions made by these defendants. For example, Judge Janow in Amherst County Family Court called Judge Kristin Booth Glen in New York Supreme Court and asked her to have Sloan and his mother arrested and his daughter Shamema extradited to Virginia. Was this a judicial act? Can Plaintiff appeal from this telephone call? Judge Glen did write a note in the record, so there is evidence this call took place, but it is submitted Judge Janow is NOT immune from suit for this.

Similarly, it is known that Judge Janow made many, many telephone calls over a period of years, even contacting the U.S. Chess Team in Dubai and the U.S. Consul General in Dubai, trying to have Sloan detained there, but it is submitted these were not

judicial acts and thus Janow who is on the list of defendants here is not immune from suit.

In *Pierson v. Ray*, 386 U.S. 547, 554 (1967), the U.S. Supreme Court held

it is established at common law than the immunity of judges from liability for damages for acts committed within their judicial jurisdiction, as this Court recognized when it adopted the doctrine, in *Bradley v. Fisher*, 13 Wall. 335 (1872). This immunity applies even when the judge is accused of acting maliciously and corruptly, and it "is not for the protection or benefit of a malicious or corrupt judge, but for the benefit of the public, whose interest it is that the judges should be at liberty to exercise their functions with independence and without fear of consequences." (*Scott v. Stansfield*, L.R. 3 Ex. 220, 223 (1868), quoted in *Bradley v. Fisher*, *supra*, 349, note, at 350.) It is a judge's duty to decide all cases within his jurisdiction that are brought before him, including controversial cases that arouse the most intense feelings in the litigants. His errors may be corrected on appeal, but he should not have to fear that unsatisfied litigants may hound him with litigation charging malice or corruption. Imposing such a burden on judges would contribute not to principled and fearless decision-making but to intimidation."

Here, that does not apply because Plaintiff and his children were never in Judge Janow's jurisdiction. Judge Janow's jurisdiction was limited both to his court, a Virginia family court that is supposed to

decide only "small cases", and to cases within Amherst County. Once the case goes outside Amherst County, such as to Lynchburg, Judge Janow loses all jurisdiction.

Ed Meeks, the Amherst County Commonwealth Attorney, knew that and for that and other reasons dismissed or *nolle* processed all the cases involving Judge Janow and Charles and Shelby Roberts in Amherst County. That is the reason, when Sloan returned to Amherst to recover his daughter Shamema, Rick Groff told him that there was no pending case against him. When Sloan came to the Amherst County Department of Social Services expecting to pick up his daughter Shamema, he was instead arrested by Sheriff Michael Cox. Sloan believed he had been tricked by Groff. However, he was later informed by Sam Kerr, the Appomattox County Commonwealth Attorney, that Groff had not tricked him. Instead Judge Janow had started a new case against Sloan and issued a new order, even though the statute of limitations on a misdemeanor charge, which this one was, is only one year.

The New York Court of Appeals decided in *Bennett v. Jeffreys*, 40 N.Y.2d 543 (1976) that unrelated third parties may not sue for the custody of a child. The Roberts and their attorney Frank Davidson III claim the Virginia Courts got jurisdiction through a transfer order from New York, but that was not true as no such order was ever issued.

WHEREFORE the decisions of the district court should be reversed and this case should be remanded to the district court and proceed to trial.



CONCLUSION

Petitioner Samuel H. Sloan respectfully requests his petition for a writ of certiorari to be granted.

Respectfully submitted,

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