

No. 20-7938

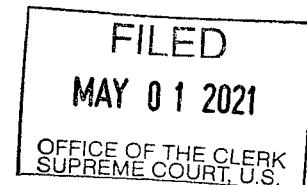
In The
Supreme Court of the United States

ORIGINAL

In the Matter of the Estate of:
Erlene Hall Phillips, an Incapacitated
and Protected Person.

CHERIE PHILLIPS

Petitioner



v.

CHARO ROWLEY

Respondent

On Petition for Writ of Certiorari
To the IDAHO COURT OF APPEALS

PETITION FOR WRIT OF CERTIORARI

Rev. Cherie Phillips, Stoic Priest

1926 Madera St., Apt. 209
Waukesha, WI 53189
(262) 309-6178

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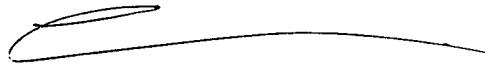
v.

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– RESPONDENT

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QUESTIONS PRESENTED

1. Whether the Idaho Courts denied the fairness and justice of Due Process when my pro se pleadings were not reviewed and were summarily dismissed while the judges acted as attorneys in the Respondent's defense and with legal strategy.

2. Whether the State of Idaho demanding Hospice as "mandatory" under threat of charging me with a "Felony" and enforced by violent martial law and kidnapping "healthy" family members from home, while the Federal Statutes clearly state that Hospice is "Optional" and may be withdrawn at any time, violates the US Constitution.

3. Whether Respondent Charo Rowley's Court Visitor Report/Supplemental Order, which supported the State of Idaho in completing the Death Penalty of my Mother, being unconstitutional and illegal under Federal, State, and County laws, precludes Ms. Rowley's payment for services rendered.

4. Whether Respondent Charo Rowley's Court Visitor Report, being a Supplemental Court Order, in full force and effect, which denied my Guardianship rights that had been granted by the Court, and, instead, granted St. Luke's Hospital (SLH) a Shadow Guardianship overpowering all my Guardianship rights, being unconstitutional and illegal under Federal, State and County laws and statutes, precludes its enforcement for payment of Court Visitor services to Ms. Charo Rowley.

5. Whether Respondent Charo Rowley's breach of statutory duties in violation and noncompliance with governing statutory authority, being unconstitutional and illegal under Federal, State and County laws and statutes, preclude its enforcement for payment for services that she did not legally render.

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

RELATED CASES

None.

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and died as a direct and proximate result

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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

The Opinion of the highest state court to review the merits, Idaho Court of Appeals, dated July 22, 2020, appears at Appendix A to this Petition and is unpublished.

The Order of the Idaho Supreme Court denying review of the Opinion, dated February 2, 2021, appears at Appendix B to this Petition and is unpublished.

JURISDICTION

The date on which the highest state court, Idaho Court of Appeals, decided this case was: July 22, 2020. A copy of that decision appears at Appendix A.

A timely petition for review by the Idaho Supreme Court was thereafter denied on the date: February 2, 2021. A copy of the order denying review appears at Appendix B.

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

UNITED STATES CONSTITUTION:

Amendment 1: Freedom of Religion, Press and Expression, Separation of Church and State, and to petition the Government for a redress of grievances.

Amendment 4: Unreasonable Searches and Seizures. The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures; and no Warrants shall issue but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched and the person or things to be seized.

Amendment 5: Due Process. No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, nor be deprived of life liberty or property without Due Process of law.

Amendment 6: Rights of the Accused. The accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the act shall have been committed, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against her; to have compulsory process for obtaining witnesses in her favor, and to have the assistance of Attorneys for her defense.

Amendment 8: Cruel and Unusual Punishment Shall Not be Inflicted.

Amendment 9: Rights Retained by the People. The enumeration in the Constitution of specific rights shall not be construed to deny or disparage other rights retained by the people.

Amendment 10: Power of the States and People. The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people.

Amendment 14: Citizenship Rights, Due Process, Equal Protection. No State shall make or enforce any law 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; nor deny to any person within its jurisdiction the Wisdom Justice of equal protection of the laws.

Human Rights (see, Appendix H)

STATEMENT OF THE CASE

COMES NOW, Petitioner, Rev. Cherie Phillips, who is the daughter and the State of Idaho court-appointed Guardian of Erlene Hall Phillips ("my Mother"), an Incapacitated and Protected Person, deceased, in opposition to the Respondent, Ms. Charo Rowley ("Ms. Rowley") (formerly Charo Webster), Court Visitor, and hereby states as follows:

1. That on or about October 25, 2016, my attorneys filed a Petition for my appointment as the Temporary and Permanent Guardian of my Mother, Erlene Hall Phillips, at the Ada County Magistrate Court Division of the District Court in the Fourth Judicial District in Boise, Idaho, Case No. CV01-16-19924.
2. That on April 17, 2017, I filed a pro se "Motion to Reopen Case and Motion to Review Court Visitor's Report and Fees and Petitioner's Responses" and Exhibits attached thereto regarding Ms. Charo Rowley (formerly Charo Webster), the court-appointed social worker, for statutory mandated services in this case, and responded to her illegal and unconstitutional Court Visitor's Report/Order and moved the court to determine the amount of fees charged and requesting that she should not be paid anything and should reimburse me for wrongful causes and breach of statutory duties, and filed at the Magistrate Court Division of the District Court in the Fourth Judicial District of Idaho in the County of Ada in Boise, Idaho, Case No. CV01-16-19924.
3. That on April 3, 2019, I mailed a Status Letter to the Clerk of the Court requesting the status of my April 17, 2017, Motion, and, the Honorable Judge Christopher M. Bieter scheduled a "Calendaring Order" for a Telephonic Status

Conference hearing on June 5, 2019, with the Magistrate Court Division of the District Court in the Fourth Judicial District of Idaho in the County of Ada in Boise, Idaho, Case No. CV01-16-19924. I requested an extension of time to properly prepare for the hearing and to submit evidence in support of my Motion, and the Judge's assistant scheduled a new hearing date. However, Judge Bieter called me on the original hearing date of June 5, 2019, and denied my request to reschedule and proceeded with the hearing. Present were Judge Bieter and me, but not the Respondent, and a transcriber recording the hearing. Judge Bieter denied my Motion, and issued an "Order Requiring Payment of Visitor Fees" filed on June 6, 2019.

4. That I mailed a Notice of Appeal on June 25, 2019, and my "Brief of Appellant" on August 5, 2019, at the District Court in the Fourth Judicial District of Idaho in Ada County, Boise, Idaho, Case No. CV01-16-19924. There was no hearing, and the Honorable Judge Gerald F. Schroeder, Senior District Judge, issued an "Opinion on Appeal" and decision that "The Magistrate's Order is Affirmed," filed October 24, 2019.

5. That I mailed a Notice of Appeal on November 8, 2019, and my "Brief of Appellant" on February 21, 2020, at the Idaho Supreme Court who transferred the Matter to the Idaho Court of Appeals for a "Disposal" Decision, Docket No 47559-2019. There was no hearing. The Opinion was issued by Judge Lorello with the "Disposal" Decision affirming the Magistrate Court's Order, and with Judge Gratton and Judge Brailsford, concurring the Decision, by an unpublished Opinion filed July 22, 2020.

6. That I mailed a "Petition for Review and Brief in Support of Petition" on August 3, 2020, at the Idaho Supreme Court, Docket No 47559-2019. There was no

hearing. The "Order Denying Petition for Review" was issued by Melanie Gagnepain, Clerk of the Courts, and filed on February 2, 2021.

7. That my Mother was the first documented case of anyone being cured of Alzheimer's disease by her BacterVira (stem cells), and she began speaking full sentences again and expressing feelings in response to conversations and events after a long time of therapeutic efforts with healthy nurturing, word studies, reading lessons, music therapy, extensive exercising, travel, cultural and social interactions, and tremendous supportive family love. She was the evidence that Alzheimer's disease is curable, and quite certainly that autism and lesser forms of dementia are also curable.

8. That while God was healing my Mother with her BacterVira, God was also blessing me with the gift of new mathematics for ancient code reading, and now all seven seals of the Original Holy Bible have been opened, revealing the sacred scriptures in the original ancient language before writing was developed. Experiencing the power of God, I learned that the brain has plasticity and the ability to do profound things when supported with a healthy lifestyle, and I believed that my Mother could be healed. And she taught me everything about Alzheimer's as our brains became as one while God guided me and increased my mental acuity to share with her whatever she needed in order to be cured from the most devastating disease known to humankind, Alzheimer's disease. Now we know that it is curable and the symptoms are reversible. I know what causes it, how it begins, how it manifests, and the difficult path that leads to the cure; and I will teach others what my Mother and God's Wisdom taught me.

9. That the State of Idaho ("State") ordered the unconstitutional, illegal Death Penalty by Forcible Euthanasia of my Precious Mother at St. Luke's Hospital ("SLH")

and which was attested by Lorenda Knight under State Authority along with two doctors of SLH, Dr. Lisa M. Hunt, MD of Idaho and Dr. Burgess Norrgard, MD of Montana, who attested under Medical Authority, and witnessed by Heather S. Dobbin, PA-C, Physician Assistant Certified, but without legal cause and without any court hearing and without Due Process in violation of the US Constitution and International Human Rights, and which was preceded by unethical, cruel and inhumane Medical Experimentation, and that the Respondent Court Visitor, Ms. Rowley, was involved, and consequently, I have refused to pay her court fees for services in this Guardianship case.

10. That Hospice is optional under Federal law and is paid by US Federal funds under the Medicare Act. However, in the State of Idaho, in-home Hospice is "mandatory" and enforced by the State and the Police; and refusal is punishable as a "Felony" as screamed by Officer Joel Ellsworth of the Ada County, Idaho Police Dept.

11. That we had recently moved from Hawaii to Idaho, and my Mother was active and able to see doctors as an "outpatient," and had just been accepted for State Medicaid benefits. An appointment was made for November 14, 2016, to establish a Primary Care Physician, Dr. Katherine Miller, MD, an American Medical Association (AMA) Board Certified family physician, affiliated with St. Alphonsus Hospital.

12. That my Mother suddenly developed a "bacterial superinfection," necrotizing fasciitis, on the side of her hip, which is resistant to all antibiotics and worsens extremely fast anywhere on the body. Since it is common in Hawaii, I knew the urgency of immediate medical care and took her to SLH. The Center for Disease Control said it may have survived the trip from Hawaii on our clothing, wheelchair, and/or our skin.

13. That I told SLH about my Mother's November 14 appointment with Dr. Katherine Miller, her Primary Care Physician who would be directing her curative medical care, but my Mother needed urgent care for the bacterial superinfection that suddenly developed and came from Hawaii where it is common and we had just moved.

14. That only the nurses examined my Mother, but not the doctors, and, consequently, the nurses misdiagnosed it as a pressure sore, but it was not.

15. That the nurse, Julie Olson, RN, wrongly peeled off the healing scab and did not know how to treat it because of the misdiagnosis, and consequently made it worse. Further, she stated: "When my father gets too old to be able to feed himself, I won't feed him; I will let him die," which was cruel and disrespectful in front of my Mother.

16. That Dr. Troy L. Johnson, MD, Dr. Martin J. Trainer, MD, and Anne Wardle, RN directed the nurses for my Mother but did not examine her themselves. They made a large list of hypothetical diagnoses for testing and sent unlabeled vials to their lab, which later showed the hypothetical diagnoses to be unfounded. But, the doctors had little interest in the bacterial superinfection, and did not know anything about Alzheimer's disease nor about elderly medical care requiring specialized training.

17. That Dr. Troy L. Johnson, MD demanded that my Mother be immediately hospitalized based on the hypothetical diagnoses and added that she "looked malnourished." I responded that she ate very healthy natural foods, whereby Dr. Johnson, with a misogynist attitude, went into a physical rage yelling that only drugs can cure, not food! Dr. Johnson, was an extreme allopathic physician untrained in nutrition nor any integrative healing. I requested from the Head Nurse to hospitalize my Mother for the bacterial superinfection under the care of a more compatible doctor, but

not Dr. Johnson. She said we would have to wait until late at night, but it was already evening and we had been there all day, and I decided to come back the next day.

18. That Dr. Troy Johnson screamed: "If you leave this hospital, your Mother is going to die!" Then Dr. Johnson and Dr. Trainer and Anne Wardle, RN, falsified the Medical Records with horrendously fraudulent personal allegations against me and my Mother and made up a long list of fraudulent maladies that lab reports later proved to be false. Further, SLH refused to give any prescription nor to show me how to care for the bacterial superinfection because of their misdiagnosis of it as a pressure sore.

19. That we returned to SLH the next day, and again I asked for my Mother to be admitted for urgent medical care for the bacterial superinfection. Dr. Boyce K. Fish, DO reviewed the fraudulent description about us in the Medical Records written by Dr. Johnson, et al., and ordered a drug used to sedate wild animals, but he was surprised when he met us, as my Mother was calm, and he said I looked like a kind woman. But, he did not examine my Mother and did not know anything about Alzheimer's disease nor the elderly, and the misdiagnosis of pressure sore that would heal once pressure was alleviated. He stated that he refused to admit my Mother and then sat down and talked to me as if I were a mentally deficient child and told me that I must stop asking for medical care for my Mother, and I must say, "I want Hospice." But, I said that I did not know anything about Hospice. Then he said to "try it," and there's no obligation, and it can be stopped at any time. Then the SLH case manager, Dorothea Decamp, told me to call Diane Stephens, RN at their SLH-affiliated agency, Complete Hospice Care.

20. That Dr. Fish wrote an Order for Hospice in the Medical Records and alleged that my Mother would soon die by natural death, but which he never discussed

with me, since she was not dying. Dr. Fish lied about my Mother to make her qualify for Hospice services with Medicare funds instead of providing expensive services at SLH.

21. That the bacterial superinfection was spreading and worsening, and on October 13, 2016, I took my Mother to the SLH-affiliated St. Luke's Clinic, Wound and Hyperbarics of Boise, Idaho, where Dr. Frederick J. Klein, MD and Nurse T'Rell Pinnock, RN treated my Mother, but refused to give any prescription. After reading the fraudulent Medical Records of Dr. Johnson, et al., Dr. Klein sat down and spoke with me like a mentally deficient child (believing that anyone with Alzheimer's is a genetic idiot) and demanded that my Mother use the SLH-affiliate, Complete Hospice Care, in our home as ordered by Dr. Fish. He said if I refused, he would call the State Adult Protective Services ("State APS" or "State") and he said, "Trust Me!" She will soon "die" and needs assistance in dying. However, this made no sense as patients need medical care to prevent sickness and diseases until natural death, but not "assistance" in dying. However, I remained calm knowing she wasn't dying and was very healthy and she had an appointment with Dr. Katherine Miller who would direct her medical care plan.

22. That we were still at Dr. Klein's office in the reception area waiting for our transportation when Lorenda Knight of the State APS called and said she was at the front door of our home and needed to "urgently" see my Mother. I said we were at Dr. Klein's office, but could visit tomorrow morning while Hospice was there. Lorenda said that she did not want to be there when Hospice was there. This made me concerned about her identity, and I requested an appointment on the State's letterhead. She agreed. And I followed up with her supervisor, Rachael Nelson, who also agreed.

23. That on that same evening of October 13, 2016, I met with Diane Stephens, RN of Complete Hospice Care in the lobby and signed the Medicare Hospice Contract. Thereafter, Diane Stephens, RN described the Forcible Euthanasia Plan which was for my Mother to stop going outside, force her to become bedridden, and only receive nutrients and hydration intravenously. This horrified me, but I remained calm, and immediately prepared a letter refusing all Hospice services under the Optional Clause.

24. That on about 5:00 pm on October 17, 2016, while we were eating dinner, our door was unlocked with a key and violent people with weapons rushed in, terrorizing my Mother and I, and screaming "Dr. Klein called!"

25. That they called themselves the "Team" and their actions were consistent with the ideology of the secret society of the Death with Dignity movement ("SS Team") who support physician-assisted surrogate suicide ("Forcible Euthanasia") of the "incompetent" and others prejudged unfit to live.

26. That the men with deadly weapons wore police uniforms of the State of Idaho and the County of Ada with Lorenda Knight and Rachael Nelson of the State APS. Officer Joel Ellsworth yelled in my face that it was a "Felony" to take my Mother to Dr. Katherine Miller, MD, and Lorenda screamed that I must "cancel that appointment."

27. That my Mother was violently kidnapped from the dinner table in our home and carried to SLH to be Forcibly Euthanized without any court hearing whatsoever and without Due Process and in violation of our Human Rights, Civil Rights, Right of Privacy, and Freedom of Religion under the US Constitution, Amendments 1, 4, 5, 6, 8, 9, 10, and 14, and such other applicable rights, laws and statutes.

28. That Officer Joel Ellsworth was in the national news for shooting a man to death in the parking lot of the police department where the victim was seeking help. However, officer Ellsworth argued that the victim was suicidal and wanted to be killed. Officer Ellsworth is a violent raging man, and lied in our police report and supported the lies of Lorenda Knight who is a serial killer. They knew each other, and work together for the covert government protected by the SS Team under State-immunity.

29. That Dr. Megan C. McCarren, MD, wrote in the SLH Medical Records that my Mother was taken from her home because she would "die within a few days" and needed physician assistance in the dying process. The SS Team at SLH described me throughout the Medical Records as mentally deficient and unable to understand simple words. Further, Dr. Lisa M. Hunt, MD wrote in the SLH Medical Records that my Mother was only at SLH "because of concerns that her daughter is not able to manage end of life issues at home adequately." They described and mocked me as a genetic idiot.

30. Why would anyone, especially over 50 doctors and nurses, et al., take an elderly lady from her home when they allegedly believed she would soon die? They wanted to remove family rights while under State custody and keep my Mother's body post mortem since Alzheimer's is valuable for research that is richly funded; but they were about to discover that she was even more valuable than they realized.

31. That I stayed the first night with my Mother at SLH and slept in a chair beside her bed, and in the morning I went home and prayed and sought Guardianship.

32. That the Police Report contained so many fraudulent allegations by Lorenda Knight of the State and Officer Joel Ellsworth that I filed Responses to be attached to

the Police Report at the Garden City Police station and I would later attach it as an exhibit to my Motion filed at the Court.

33. That in an effort to save my Mother from captivity at SLH, I sought Guardianship, but the free services of Legal Aid were "blocked" since they represented the State APS in allegedly seeking Guardianship. Thus, I had to hire private attorneys which catapulted me into enormous financial debt.

34. That on or about October 25, 2016, my attorney Heather L. Conder, Esq., filed a Petition to appoint me the Temporary and Permanent Guardian of my Mother and filed my Affidavit of facts requiring an "emergency" proceeding.

35. That at SLH, the nurses said that my Mother was "talking" and they were surprised and excited and the doctors brought in a specialist who was a Speech Therapist and who wrote in the Medical Records that my Mother was speaking "intelligible words." Upon making this discovery, the SS Team began to fight viciously and unethically for State Guardianship of my Mother in efforts to keep her body post mortem and exterminate family rights.

36. That my attorney, Heather L. Conder, Esq., called and said Guardianship was just filed and would be approved shortly. I was at SLH and excitedly told the nurse who immediately rushed out of the room. Upon returning, she said that she was sorry to hear that I did not get a guardianship. SLH knew before my attorneys.

37. That the State and SLH had called the Magistrate Court and covertly contested my Guardianship proceedings which resulted in delay that gave more time to the State and SLH to proceed with the Forcible Euthanasia Plan.

38. That on or about early November, 2016, the Magistrate Court appointed Trent Marcus, Esq. as the Guardian ad litem with duties under Idaho Code, I.C. 15-5-303 and Idaho Code, I.C. 15-5-314, and required to investigate the facts and file a Guardian ad litem Report with the Magistrate Court.

39. That the Magistrate Court then appointed Ms. Charo Rowley (formerly aka Charo Webster), Licensed Clinical Social Worker, to visit our home and with duties under Idaho Code, I.C. 15-5-303 and Idaho Code, I.C. 15-5-314, and to file a Court Visitor Report with the Magistrate Court.

40. That on October 21, 2016, Lorenda Knight of the State APS called after hours making a Ransom Demand in exchange for my Mother's release from captivity, and she wanted to know about accessing our finances. She demanded that if she lets my Mother come home I must use the SLH-affiliated agency, Complete Hospice Care, and that I must not take my Mother to any physician, and that my phone must be turned on at all times and all calls must be answered, and that I must open the door whenever she comes to our home and must allow her complete access to our records and home.

41. That I told Lorenda about my extensive efforts for medical care of my Mother who had a beautiful life and a very healthy lifestyle and started speaking sentences again, saying, "I enjoyed that," after her sit-and-walk along the Greenbelt and that she was able to walk around in our home and to walk to the bathroom and take showers. But Lorenda screamed that I must "never say that again!" And then demanded that if I wanted to see my Mother again, I must say "My Mother is bedridden!" But she was not.

42. That my attorney, Heather L. Conder, Esq., called Lorenda and told her to discuss everything with her instead of me, but Lorenda never called my attorney back.

Instead, as a consequence of my refusal of the Ransom Demand, Lorenda on behalf of the State worked with the SS Team to viciously resist my Guardianship and worse.

43. That Kayla Marshall, the Social Worker at SLH, wrote continuous fraudulent entries into the Medical Records with massive Propaganda mesmerizing and fueling the SS Team with motivation of "extreme hate" in support of the Euthanasia Death Penalty and the extermination of family rights, and, thus, the SS Team coordinated eight covert attacks to stop me from obtaining Guardianship and for them to have more time to Forcibly Euthanize my Mother, including, but not limited to: (1) covertly delaying the Guardianship while the Court appointed a Guardian ad litem and Court Visitor to file Reports; (2) refused to give my attorney a diagnosis that my Mother needed a guardian; (3) made massively fraudulent Medical Records for the Guardian ad litem and the Court Visitor to attach to their Reports to file in this case; (4) massive propaganda to incite the medical staff to participate in hateful entries in the Medical Records to support extermination of my family rights; (5) made a threatening conference call demanding for me to come to SLH but I was concerned they would hold me in captivity, and they refused to talk with me by phone; (6) tried to have me arrested under false pretenses; (7) tried to hold me captive during a visit with my Mother at SLH after I asked why my Mother had lost massive amounts of weight so quickly, and then I was threateningly surrounded by the SLH staff and who blocked the door, but retreated after seeing that I was calm and spoke logically; and (8) accepted a Deal ("Deal") from the Court Visitor, Ms. Rowley, for SLH to be granted a Shadow Guardianship blocking all my Guardianship rights.

44. That I activated St. Alphonsus-Treasure Valley Hospice and advised Kayla Marshall, the Social Worker. However, SLH still refused to release my Mother from captivity which showed that they had no true interest in my Mother. Before, they alleged the problem was all about my refusal of Hospice. Now, they demanded possession of my Mother with "no" family rights at all, and they believed she would die soon, and they and continued to viciously fight to keep her body post mortem.

45. That the Medical Records at SLH fraudulently show that I had given an "oral" Informed Consent witnessed by Jessica Viello with a forgery of my signature, but I did "not" give any Informed Consent. Further, it shows I had agreed to an "option" for everything about me to be published statewide in the Medical Records, but I did "not."

46. That none of the doctors were given "informed consent" by me. The doctrine of informed consent is a primary means developed in the law to protect the personal interest in the integrity of one's body. "Under this doctrine, no medical procedure may be performed without a patient's consent, obtained after explanation of the nature of the treatment, substantial risks, and alternative therapies." (Matter of Conroy, 486 A. 2d 1209 (1985), NJ: Supreme Court.)

47. That the SS Team was deliberately causing my Mother to become malnourished to fit the fraudulent Medical Records of Dr. Troy L. Johnson, MD, et al., and gave her ice cream and chocolate pudding, and, then began withdrawing foods and starving my Mother to make her die. But her strong health kept her from dying quickly.

48. That when I expressed my concern for their refusal to feed my Mother and refusal to let me feed her, the nurse said, "This is how we die." But it is not.

49. That SLH cruelly placed a board (covered with a sheet) against my Mother's throat that, along with Opiod and Haldol narcotics, caused permanent throat injury and dysphagia, the inability for her to swallow. I removed the board while I was there.

50. That SLH moved my Mother to an isolated area of the Surgery Department where no one would hear her crying in pain during the cruel experiments to test methods of physician-assisted suicide and Forcible Euthanasia. Further, she was inhumanely subjected to pain experiments to test her painful reactions and threshold (how long she could stand the pain). Dr. Gregory T. Trapp, MD, committed this crime by ordering the staff to deny sufficient food for my Mother to set the groundwork for complete starvation, and he cruelly joked in the Medical Records: "Don't Hate Me."

51. That Heather S. Dobbin, PA-C, Physician's Assistant Certified, who called herself the "Slim Hospitalist," conducted drug experiments to see my Mother's reaction to combinations of hallucinogenic narcotics and then gave her Opiod narcotics to test her reaction. At first a doctor had to sign for Ms. Dobbin's orders from SLH pharmacy, but while she was experimenting with my Mother, they allowed her to order by telephone without a doctor. Ms. Dobbin then began "playing" with narcotics that she gave to my Mother for Ms. Dobbin's pleasure of watching my Mother's reactions. Ms. Dobbin was "not" even a doctor and was allowed to experiment on my Mother. I am in tears because it is so horrendous that my nearly 89 year old Mother had to endure this torture the same way as barbaric nations torture their political enemies. And the Court could have protected her, but delayed the Guardianship and knowingly left her alone at a major hospital without informed consent. The SS Team thinking she was going to die anyways, did not care how much pain and suffering they inflicted upon her.

52. That they never thought anyone outside of themselves would see my Mother's records, and boastfully the SS Team shared their pleasurable experiments with each other. Ms. Dobbins also gave my Mother injurious Opiod and Haldol narcotics to induce permanent dysphagia, and then some of her teeth were cracked out so that it would be painful to eat. This was unconscionable beyond comprehension.

53. That International Law prohibits the involuntary medical experimentation on humans but which SLH did when it tested deadly experimental drug combinations on my Mother to be used for Forcible Euthanasia of those who are incompetent and also for the physician-assisted suicide of those who are competent, but without informed consent nor prior knowledge by the family, and, further, SLH wrongfully used State-immunity authorized by the State of Idaho under Color of Law to approve such wrongful experimentation by combining Opiod narcotics and Haldol to induce "dysphagia" and multiple drug combinations to induce the process of death and internal injuries and inducing her into a comatose state and refusing to give my Mother food and water, and other acts of atrocities which caused her enormous pain and suffering.

54. That after the experimentation, the SS Team at SLH Forcibly Euthanized my Mother when they knew their time was limited and the Court advised them that I would soon become her Guardian.

55. That the SLH doctors could have waited for my Guardianship, but the SS Team lied to the medical staff and made them think that there is no way the idiot daughter could become her Guardian and that my Mother allegedly had a poor quality of life with dementia and was bedridden (but she wasn't before) and so they transitioned quickly to the "Final Solution" of Forcible Euthanasia. But, some doctors

argued against it as being unethical when no one was there to give informed consent and that they could sustain her until a decision was made for a Guardian. However, the SS Team wanted to move quickly in their efforts to make her die before my Guardianship so that they could keep her body post mortem.

56. That the Medical Records state that on November 1, 2016, the State of Idaho and St. Luke's Hospital ordered the unconstitutional, illegal Death Penalty by Forcible Euthanasia of my Precious Mother at St. Luke's Hospital and which was attested by Lorenda Knight under State Authority along with two doctors of SLH, Dr. Lisa M. Hunt, MD of Idaho and Dr. Burgess Norrgard, MD of Montana, who attested under Medical Authority, and which was witnessed by Heather S. Dobbin, PA-C, and carried out the Death Sentence of the experimental subject, my Precious Mother, by Forcible Euthanasia, but without legal cause and without any court hearing and without Due Process and in violation of the US Constitution and International Human Rights.

57. That Dr. Lisa M. Hunt, MD, one of the doctors who ordered the Forcible Euthanasia of my Mother, wrote in the Medical Records: "She has dementia which is irreversible . . . and a very poor quality of life . . . and she is only at SLH because of concerns that her daughter is not able to manage end of life issues at home adequately."

58. That Dr. Burgess Norrgard, MD a Montana doctor (where physician-assisted suicide is practiced) traveled all the way to Idaho, and, after ordering the Forcible Euthanasia, he wrote in the Medical Records: "Give some morphine for the SOB" so as "not to give the wrong message to her daughter."

59. That Heather S. Dobbin, PA-C, the Physician Assistant Certified, who entertained herself with inhumane experimentation using injurious narcotics on my Mother, and who was the witness to the attested Forcible Euthanasia, boasted her wrongful acts with the SS Team in the Medical Records while disrespectfully calling herself repeatedly the "Slim Hospitalist," mocking the starved condition of my Mother being condemned to the final phase of Forcible Euthanasia by "Slender Man" the infamous fictional character popular in movies who forces others to commit suicide.

60. That the SS Team ordered my Precious Mother to be dehydrated and starved to death along with Opiod narcotics and Haldol and other lethal dosages of drugs to induce her into a comatose state and causing permanent dysphagia (inability to swallow) and brain damage and fatal internal injuries, along with complete withdrawal of all food and water; and, then they walked away and left her to die alone in her room.

61. That my Mother, being held in captivity at SLH against her will and against her family's will, and being all alone and unprotected, began the long painful physician-induced death process as her internal organs suffered with immense pain from dehydration and the deadly attack upon her brain after she had worked so hard to become cured from Alzheimer's disease but was now suddenly being forced into oblivion from the deadly effects of narcotics and the inhumane painful injuries which were brutal and barbaric beyond comprehension. There are no more words. No words.

62. That when I visited my Mother, I expressed my concern over her enormous weight loss, and SLH surrounded me with their staff and threatening me if I tried to stop it, and then Dr. Chen explained to me that my Mother was on orders of Hospice and would "not" be given any food or water and that "starvation is a humane way to die."

This also confirmed that Hospice, in the perspective of SLH, is Forcible Euthanasia by withdrawal of food and water, but which is "not" the intended purpose of Hospice.

63. That Dr. Margaret L. Chen, MD gave feigned excuses for my Mother's starvation and wrote to the concerned staff in the Medical Records that "the daughter knows we don't have the time nor resources to feed her mother." Further, she went back and made several entries in the Medical Records fraudulently stating that the daughter said her Mother "spits out all her food" thinking she is brushing her teeth. And also, Dr. Megan C. McCarren, MD went back and made fraudulent entries in the Medical Records to protect and defend the SS Team and to defame my family.

64. That most of the SLH Medical Records of my Mother had been wrongfully "edited" with massive attacks against "me" with fraud, lies, and deception. Forensic analysis showed two versions or more with different authors, and simple original entries were traced by the network to the edited complex fraudulent entries of Dr. Troy L. Johnson, MD, et al., with massive Propaganda mesmerizing and fueling the SS Team with motivation of "extreme hate" in support of the Euthanasia Death Penalty and the extermination of family rights. In the end, the Medical Records became a fiction book crafted from every thing they could imagine.

65. That the members of the SS Team have no conscience and their guilt is repressed with their Opiod narcotics and their wild nonconscious mind overpowers any rational feelings and rages up with mindless inhumane actions against their victims. Dr. Margaret Chen admitted that she herself was taking Opiod narcotics, and those in the SS Team act with symptoms consistent with severe narcotic addictions.

66. That only two doctors and a nurse at St. Luke's Hospital refused to cooperate with the SS Team on ethical grounds as shown written in the Medical Records and made efforts in rational arguments in opposition. God bless them.

67. That in the SLH Medical Records, the lab reports showed that my Mother was initially very healthy and that the long list of hypothetical diagnoses were used as deception to contest my guardianship efforts along with their massively fraudulent editing and propaganda in the Medical Records, and, thus, shows premeditated intent to commit Forcible Euthanasia (attested in writing in the Medical Records). This was similar to the physician-assisted homicide method used by doctors in Nazi Germany. Doctors lie, but lab reports do not lie; however, lab reports can be exchanged with other patients and with the unlabeled vials such as those used by the SS Team for my Mother as shown in the Medical Records.

68. That, further, the method used by the SS Team was very similar to the method used by the doctors in the Warmbier case when North Korea kidnapped and illegally detained, tortured and fatally injured a tourist who was a University of Virginia student, Otto Warmbier, and returned him to his family in a non-responsive state with medically induced severe brain injuries. As a direct and proximate result of North Korea's actions, Otto died after his release. He was held in a hospital under the fraudulent claim of medical treatment and was given fatal dosages of Opiod narcotics strategically combined with other lethal drugs. (Warmbier v. Democratic People's Republic of Korea, Civ. Case No. 1:18-CV-00977.)

69. That on November 10, 2016, Trent Marcus, Esq. filed his Guardian ad litem Report with the Court and recommended that guardianship be granted to me.

70. That my attorney Heather L. Conder, Esq and the Guardian ad litem, Trent Marcus, Esq. pressured the Court to recommended Guardianship for me.

71. That the Honorable Judge Christopher M. Bieter of the Magistrate Court granted me a Temporary Guardianship by Order dated November 14, 2016. However, Ms. Charo Rowley's Court Visitor Report functioned as an illegal Supplemental Court Order that in effect granted a Shadow Guardianship to SLH and the State with full Guardianship rights and which was enforceable by threat of guns and violence by the SS Team who kidnapped my Mother, if I refused to submit to their authority. Thus, I was granted Guardianship, but without any Guardianship rights.

72. That after the SS Team had maliciously induced my Mother into a comatose state and several doctors confirmed that she was in the actively dying process, they covertly contacted the Court without a hearing. My attorneys told me that SLH had made demands that my Mother had to have Hospice or she could not come home.

73. That even though I had been granted Guardianship under Statutory authority, I had "no" guardianship rights to act in any way to protect my Mother nor to secure any curative medical care for her, and everything "after" being granted guardianship was worse than "before" filing the petition with enormous financial debt. And, in the end, SLH and the State had complete control over my Mother and me.

74. That I had already set up Treasure Valley Hospice, and they were there on November 15, 2016, when my Mother was carried home from SLH in an ambulance and arrived in a non-responsive comatose state for which she remained in most of the time except briefly awakening for short periods. She was unable to move by herself and in pain when moved. Her throat had been severely injured and she had dysphagia, and

some teeth were cracked out and some were missing. She was dehydrated and her tongue was covered with fungus, and SLH had dug a large hole down to the bone into the original sore on the side of her hip and the bacterial superinfection sores had multiplied and spread all over her body and was so severe that it even transferred onto my arm. She had bruises and was brain damaged with severe internal injuries, kidney damage, and SLH had forced her to become completely bedridden and unable to move. She could no longer sit up and could no longer walk, and she had suffered horrendous starvation down to her skin and bones, and showed the atrocities that had been forced upon her during captivity and unethical inhumane experimentation at SLH.

75. That she still had the grape juice coloring her teeth and tongue that was from her last meal when they kidnapped her, and which showed the extreme denial of water to drink and the horrendous suffering she endured with long excruciatingly severe dehydration that even a SLH doctor had expressed in horror in the Medical Records.

76. That I spent every hour desperately trying to save my Mother's life and trying to feed her liquified nutrients when she was briefly awake, but she had been irrecoverably starved and her throat was severely and permanently damaged from the board that the SS Team had kept cruelly pushed up against her throat.

77. That SLH gave me "no" prescription for any curative treatment for my Mother, but many narcotics, two bags full. But, she needed "curative" conventional medicine and needed a doctor to examine her to see if she could be saved, but which they denied under "threat" of violence and more injuries because SLH and the State did not want other doctors to see what they had done to my Mother. And I cried prayers.

78. That I immediately obtained the Medical Records and discovered that Ms. Rowley, the Court Visitor, was involved, and I refused to make further payments to her.

79. That out of 1,143 pages of SLH Medical Records, there is a huge amount of massively fraudulent defamatory and slanderous accusations and propaganda about me, and states that I told them these things, but I did not. The entries are chaotic, contradictory, and show massive tampering, editing, and alterations throughout.

80. That in the Medical Records, the nurse, Julie Olson, RN, who did all the treatment of the spreading sores, had exchanged the before and after pictures to make it look like she had made progress, but she did not have the medical training to treat bacterial superinfection and none of the doctors provided any medical care for them.

81. That my Precious Mother died on December 2, 2016, and the direct and proximate cause was the Death Penalty of Forcible Euthanasia and unethical and inhumane Experimentation with *mens rea* and violent hate beyond comprehension, and such other intentional and malicious causes shown by the evidence, and the Death Sentence was carried out by the State and SLH, in violation of Human Rights and the infliction of Cruel and Unusual Punishment without Due Process in violation of the US Constitution, and in violation of such other applicable laws and statutes.

82. That while I was at the funeral home, the Funeral Director advised me that a doctor was examining my Mother's body. I said that no one is authorized to see her, and then the Funeral Director went to speak with the doctor, but was gone a long time. I did not see my Mother buried since she was buried out of town as I could not obtain the additional thousands of dollars needed for a closer burial site. But, after the forensic

analysis of the Medical Records showing the horrendous details, I am concerned that my Mother's body may have been sold to SLH instead of being buried.

83. That my Mother's Death Certificate was fraudulent and the doctor who wrote the cause of death as "Alzheimer's Disease" even said that she was a smoker, but she was not. I called the doctor and left messages, but he refused to return my calls, and refused to change the cause of death, but only changed it to show non-smoker.

84. That the wrongful death of my Mother was committed with extraordinary prejudice and hate by the State and SLH, et al. and was the most unconscionable documented Human Rights violation against anyone with Alzheimer's disease in the history of America.

85. That Lorenda wrote in the State APS Records, "successful resolution" of the Adult Protection Plan, which was in effect, the Idaho Euthanasia Program and Idaho Physician-Assisted Suicide under the upcoming State plan for the Idaho Death with Dignity Act. We know what they have done so far and what is yet to come without any remorse and no consequences for their wrongful actions and with huge profits from fraudulent siphoning of Federal Medicare benefits, and the victims yet to be chosen.

86. That on April, 20, 2017, I filed a Motion at the Courthouse to obtain the 911 Record and the State APS Record regarding the kidnapping of my Mother. I attended a hearing and the Court ordered the release of the records. Thereafter, I obtained the 911 Record, but the State APS Record was delayed when Lorenda Knight and her supervisor Rachael Nelson went into hiding and there was no response until after a long time when a new supervisor sent the Record, but which was massively fraudulent and coordinated with the same fraud in SLH's Medical Records.

87. That on April 17, 2017, I filed a Motion against the Court Visitor with Responses to her Report/Order at the Magistrate Court for Breach of Duties and wrongful and illegal acts and a request not to pay her. But, there was no response.

88. That Kayla Marshall, the social worker at SLH, wrote in the Medical Records that she vowed to come after me next, and she did. In 2017, in Idaho, Mr. Robert Powers sent me a threatening letter on a sloppily photocopied Idaho Dept. of Health and Human Welfare letterhead, demanding to enter my home on 9/11 (September 11, 2017) and thereafter continuously, and that he could only be reached on his cell phone and his typed phone number at his Oregon office, and with blood-red handwriting added, that he must enter my home, privately, and that it is "critical" and must be "face-to-face." I responded to him and the Administrator of the State agency with a cease and desist letter as this demand was illegal and unconstitutional without an order.

89. That, further, I received continuous threatening phone calls and messages, and I moved away from Idaho.

90. That on April 3, 2019, I mailed a Letter requesting the Status of my April 17, 2017, Motion requesting not to pay the Court Visitor's fees and set forth my Responses and reasons therefor. The Honorable Judge Christopher M. Bieter scheduled a telephone hearing on June 5, 2019, for which I requested more time to prepare, but which was denied and he also denied my Motion and ordered the payment of the Court Visitor's fees. Thereafter, the appellate courts concurred. Ms. Rowley (Webster), the Court Visitor, did not attend the hearing and did not respond to my appellate briefs.

91. That my appellate Briefs set forth the facts and evidence showing that Ms. Charo Rowley had statutory duties under the Idaho Code, I.C. 15-5-303 and

I.C. 15-5-314, but the evidence shows that Ms. Rowley breach those duties in violation and noncompliance with governing statutory authority, including but not limited to:

91.1. The Medical Records show that Ms. Rowley made an illegal covert Deal with SLH promising to grant them Shadow Guardianship rights using her Court Visitor Report as a Supplemental Court Order;

91.2. Ms. Rowley's Court Visitor Report, being a Supplemental Court Order, in full force and effect, denied my Guardianship rights that had been granted by the Court, and, instead, granted SLH a Shadow Guardianship overpowering all my Guardianship rights and complete control over my Mother, enforced by martial law with threat of violence to my Mother and I, and to repeat the wrongful kidnapping;

91.3. Ms. Rowley's Court Visitor Report/Supplemental Order supported the State of Idaho in completing the Death Penalty of my Mother by demanding "no" curative medical care when returned home after the Forcible Euthanasia by SLH who carried out the Death Sentence and Experimentation under the Death Penalty ordered by the State of Idaho without Due Process;

91.4. Ms. Rowley opposed curative care of my elderly Mother by doctors and supported noncurative Hospice services that only provide narcotics;

91.5. Ms. Rowley stated she was working for Hospice agencies, but she was demanding "mandatory" Hospice contrary to the Federal Medicare Act governing Hospice agencies as "optional" that can be freely withdrawn at any time;

91.6. Ms. Rowley, since she worked for Hospice agencies, benefitted from mandatory Hospice services in Idaho which is contrary to the federal statutes governing

Hospice under the Medicare Act, and whose services have become illegal, violent, inhumane and unconstitutional;

91.7. Ms. Rowley never investigated the facts and refused to do the fact-finding social work for which she was appointed;

91.8. Ms. Rowley visited our home; however, with negligent insufficiency and inaccuracy, she deliberately, or being confused with another case, described our home as being of inferior quality, but it was "not";

91.9. Ms. Rowley refused to interview witnesses of our healthy and active lifestyle and those with whom my Mother was an inspiration and who were sitting right outside in the courtyard, and many others nearby who loved my Mother and knew her from our frequent visits because she enjoyed social interactions with many people;

91.10. Ms. Rowley delayed her visit to my Mother at SLH after I called and pleaded for her mercy of extreme urgency to visit my Mother since SLH was starving her to death;

91.11. Ms. Rowley used her Court Visitor Report with false and fraudulent defamatory and slanderous accusations and implications against my beliefs and character without any supporting facts nor evidence;

91.12. Ms. Rowley placed false and fraudulent facts and conclusions in her Court Visitor Report that she never discussed with me prior thereto to respond and provide evidence of the truth;

91.13. Ms. Rowley demanded extermination of all my family rights with complete control of me and my family and she threatened violent martial law if I asserted any of the Guardianship rights that I was granted by the Court. And she based

her demand on fraudulent allegations and conclusions without any supporting facts whatsoever, and which was illegal and unconstitutional invasion of our right of privacy;

91.14. Ms. Rowley cruelly threatened me and my Mother with guns and violence of martial law again if we refused "mandatory" Hospice, but which is "optional" and can be withdrawn at any time, and which denied "curative" medical care to my Mother;

91.15. Ms. Rowley used her Court Visitor Report to promote her personal and political beliefs in the National Death with Dignity political movement which is promoting the use of Hospice for physician-assisted suicide for those who are competent, and which has branched into Forcible Euthanasia by starvation and dehydration of those who are incompetent, however, being statutorily illegal in Idaho (but which is being done illegally and covertly by a large group in Idaho as shown in this case) she should "not" have ordered me to apply her political beliefs in "Death with Dignity" for my Mother and which was against our religious beliefs in violation of our Freedom of Religion under the US Constitution;

91.16. Ms. Charo Rowley did "not" make any recommendations to the Court, which was contrary to her statutory duties;

91.17. Further, such other breached duties as shown to be applicable hereto.

92. That Ms. Rowley's Court Visitor Report, being a Supplemental Court Order, in full force and effect, which denied my Guardianship rights that had been granted by the Court, and, instead, granted St. Luke's Hospital (SLH) a Shadow Guardianship overpowering all my Guardianship rights, being unconstitutional and illegal under Federal, State and County laws and statutes, precludes its enforcement for payment of Court Visitor services to Ms. Charo Rowley.

93. That Ms. Rowley's Court Visitor Report/Supplemental Order, which supported the State of Idaho in completing the Death Penalty of my Mother by demanding "no" curative medical care when returned home after the Forcible Euthanasia by SLH who carried out the Death Sentence and Experimentation under the Death Penalty ordered by the State of Idaho without Due Process, being unconstitutional and illegal under Federal, State, and County laws, precludes Ms. Rowley's payment for services rendered.

94. That Ms. Rowley's breach of statutory duties in violation and noncompliance with governing statutory authority, being unconstitutional and illegal under Federal, State and County laws and statutes, preclude its enforcement for payment for services that she did "not" legally render.

95. That the Medical Records show documented *mens rea* with extraordinary hate by the SS Team of the State and SLH who are extremists that acted with *mens rea* and prejudiced hate because we did not resemble their official members since my Mother had red hair, and I am a Native American Indian, and they vowed to "go after the daughter (me) next," and thus, clearly showing their belief in genocide and that defective genes are the cause of Alzheimer's disease, but they are not, and, further, they hated us because we did not obey the commanding orders of their fascist leaders operating covertly within SLH and the State, the government within the government.

96. That the Perpetrators who are members of the SS Team are empowered by the unelected government functioning covertly within the elected government since they have access to private records of every citizen, which enable them to choose their

defenseless victims while practicing Forcible Euthanasia with Federally funded Hospice and at St. Luke's Hospital in Boise, Idaho.

97. That the evidence shows that the Forcible Euthanasia SS Team were a large group of people who were highly educated doctors, lawyers, judges, social workers, pharmacists, police, and others hidden within governmental agencies, spanning Idaho, Montana and Oregon, and they all have State-immunity by the SS Team to protect them from liability for their inhumane and illegal actions.

98. That it took over fifty (50) doctors, nurses, pharmacists and other healthcare workers to Forcibly Euthanize my Mother, and all were paid by the federal taxpayers with Medicare funds. The members of the SS Team of the State and SLH acted with fascist Deprivation of Rights under Color of Law in violation of Title 18, USC, § 242, and with violations of the US Constitution Human Rights, Civil Rights, Right of Privacy, Freedom of Religion, and Separation of Church and State.

98.1. Those Perpetrators who directly participated and/or directly supported the SS Team in the Idaho Euthanasia Program in this case include but are not limited to: Lorenda Knight and Rachael Nelson, State of Idaho Center on Aging. Area 3 Senior Services Agency; Joel Ellsworth, Police Officer, Garden City Police Dept.; Nurse Diane Stephens, RN, Complete Hospice Care; David Pate, Administrator, St. Luke's Hospital (SLH); Head Nurse from Oct. thru Nov. 2016 (SLH); Jessica Viello (SLH); Kayla Marshall, Social Worker (SLH); Marsha Cahue, Case Manager (SLH); Dr. Troy L. Johnson, MD (SLH); Dr. Martin J. Trainer, MD (SLH); Nurse Anne Wardle, RN (SLH); Nurse Julie Olson, RN (SLH); Dr. Boyce K. Fish, DO (SLH); Dorothea Decamp, Case Manager (SLH); Dr. Megan C. McCarren, MD (SLH);

Dr. Greg Trapp, MD (SLH); Dr. Margaret L. Chen, MD (SLH); Dr. Burgess Norrgard, MD (SLH) (Montana); Dr. Lisa M. Hunt, MD (SLH); Heather S. Dobbin, PA-C, Physician's Assistant Certified ("Slim Hospitalist") (SLH); Amanda Allen, Nursing Assistant (SLH); Mikayla Payne, Nursing Assistant (SLH); Nurse Christine Hatley, RN (SLH); Nurse Jessica Stein, RN (SLH); St. Luke's Hospital Pharmacists from Oct. thru Nov. 2016 (SLH); Dr. Frederick J. Klein, MD and Nurse T'Rell Pinnock, RN, St. Luke's Clinic - Wound and Hyperbarics, Boise, Idaho; Idaho Legal Aid Services; Idaho State Dept. of Health and Human Services; Idaho Dept. of Health and Welfare, Boise, Idaho; Charo Rowley (Webster), Social Worker, Court Visitor; some Hospice agencies practicing in-home Forcible Euthanasia and targeting senior citizens' apartments; and such other individuals, agencies, associates, and/or assigns who were the Perpetrators.

99. That while my Mother was held in captivity at SLH, I sought help nationwide from over 200 authorities, and the Governor and the State Attorney General's Office, and the Federal government but no one would help because of my Mother's age, and, thus, it will happen again because there are no consequences since they have State-immunity, and no one is safe in their private home anymore, and the elderly live in fear.

100. That in the case, *United States v. Classic*, 313 US 299, the Court stated that § 20 of the Criminal Code, 18 USC § 242 provides a criminal punishment for anyone who "under color of any law, statute, ordinance, regulation, or custom" subjects any inhabitant of a State to the deprivation of "any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States." And, further:

"the State courts in the several States have been unable to enforce the criminal laws of their respective States or to suppress the disorders existing, and in fact that the preservation of life and property in many sections of the country is beyond the power of the State government, is a sufficient reason why Congress should, so far as they have authority under the Constitution, enact the laws necessary for the protection of citizens of the United States."

101. That my Mother and I had a right to live according to our peaceful and virtuous religious beliefs and to seek curative medical care by a compassionate physician, Dr. Katherine Miller, MD., and for my Mother to enjoy being active in her life until God was ready for her life to end naturally and peacefully, and the "Right to Life under God" is guaranteed under the First Amendment of the US Constitution.

102. That in Perna v. Pirozzi, *supra*, 92 NJ 446, 459-65 (1983), at 347, 461, the Court reasoned:

"Absent an emergency, patients have the right to determine not only whether surgery is to be performed on them, but who shall perform it." . . .

"No right is held more sacred, or is more carefully guarded by the common law, than the right of person, free from all restraint or interference of others, unless by clear and unquestionable authority of law."

103. That Human Rights are protected under numerous State, Federal, and International laws, and, under the US Constitution.

104. That in *Monroe v. Pape*, 365 US 167, (1961), the Supreme Court stated:

"Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress."

105. That in the case, *State v. Wells*, the Idaho Supreme Court issued the Death Penalty to Wells for bludgeoned his victims to death. However, the State of Idaho

issued the Death Penalty to my Mother without any hearing and without Due Process, and, thus, with less rights than a convicted criminal. (State v. Wells, 864 P. 2d 1123 (1993), 124 Idaho 836, Idaho: Supreme Court.)

106. That in the case of Living Centers of Texas, Inc. v. Penalver (217 SW 3d 44 (2006), Tex: Court of Appeals, 4th Dist.), the Court stated:

"The defense is that this death is not significant because she is old and because she is impaired. I disagree. Our society has not regressed to the point that we tolerate a wrongful death of anybody, of any age, or of any infirmity . . . The most significant gift we have from God is life itself."

107. That the described wrongful actions committed by the State and SLH, et al. is similar to the case Gilbert v. State, 487 So. 2d 1185 (1986), Fla: Dist. Court of Appeals, 4th Dist., wherein the Court gave the definition of the word "feloniously":

" Of, pertaining to, or having, the quality of felony. Proceeding from an evil heart or purpose; done with a deliberate intention of committing a crime. Without color of right or excuse. Malignantly; maliciously. Acting with a felonious intent; i.e., acting with intent to commit a felony. Euthanasia is not a defense to first degree murder in Florida and this court has been furnished with no law or statute to the contrary."

108. That in the Matter of Zornow (919 N.Y.S.2d 273, 31 Misc. 3d 450 (2010) NY: Supreme Court, Monroe), the Court concluded that "nutrition and hydration should not be withheld from patients . . . [with the excuse that] prolonged care for them may involve significant costs."

109. That case law shows that death by starvation and dehydration is "painful." In the Matter of Conroy, 486 A. 2d 1209 (1985), the New Jersey Supreme Court reasoned that the State's interest is in preserving life. However, in my Mother's case, the State's interest was in forcing her to die and with the Court Visitor's Report/Order in allegiance with the Montana and Oregon Death with Dignity Act.

110. That In re Guardianship of Pescinski (67 Wis.2d 4 (1975), 226 NW 2d 180 (1975), Wis: Supreme Court), the Court stated: "An incompetent particularly should have his [her] own interests protected. Certainly no advantage should be taken of him."

111. That in the case, Cruzan v. Director, Mo. Dept. of Health, 497 US 261 (1990), the Supreme Court reasoned:

"Choices about life and death are profound ones, not susceptible of resolution by recourse to medical or legal rules. It may be that the best we can do is to ensure that these choices are made by those who will care enough about the patient to investigate his or her interests with particularity and caution. On either explanation, then, the Court's deference seems ultimately to derive from the premise that chronically incompetent persons have no constitutionally cognizable interests at all, and so are not persons within the meaning of the Constitution. Deference of this sort is patently unconstitutional. It is also dangerous in ways that may not be immediately apparent."

112. That in the Matter of Conroy, 486 A. 2d 1209 (1985) - NJ: Supreme Court, the Judge stated: "a necessary prerequisite to surrogate decision-making is a judicial determination that the patient is incompetent to make the decision for himself and designation of a guardian for the incompetent patient if he does not already have one."

113. That Frederick ("Fritz") J. Klein, MD, shows at his website that he speaks "fluent German." The SS Team stated during the kidnapping and repeatedly by doctors and nurses in the Medical Records that Dr. Klein chose my Mother to be brought to SLH during his abusive conversation with me in his office, and thereafter, my Mother was Forcibly Euthanized under the Death Penalty ordered by the State and SLH. Further, one of the Nazis who was given the Death Penalty at the Nuremberg Trials had the exact same name, Frederick ("Fritz") J. Klein, MD.

114. That the State and SLH used the same methods as Nazi Germany during the Forcible Euthanasia of my Mother, and which was retribution that began when she was chosen by Dr. Klein on October 13, 2016, and the State of Idaho ordered the Death Penalty for my Mother, which is the anniversary month of October when the death penalty of the Nazi leaders was carried out after the Nuremberg Trials.

115. That the nurse of Frederick J. Klein, MD is named T'Rell Pinnock, RN, and T'Rell is a code that means "Hitler Design."

116. That the State and SLH Euthanasia Program violates the US Constitution Bill of Rights and is an Invasion of Privacy and is Domestic Terrorism, and is anti-American Human Rights violations, and follows the system established by Hitler in commanding the doctors in his illegal medical actions (code named T4, symbolizing the 4-letter tetragram code name of Hitler, TREL) described in detail in the transcript of the Nuremberg Trials, vol. 1 and 2, which included a film showing the atrocities of starvation and withdrawal of water and experimentation, et al. As a result, the Nuremberg Code was established in 1947, along with the United Nations Universal Declaration of Human Rights to guide all nations worldwide with ethical virtues.

117. That Lorenda Knight, the State APS, Adult Protection Worker, made her last name from the Nazi terrorist SS Protection Squad's name for Hitler: "Knight."

118. That the United States and all members of the United Nations are parties to the Statute of the International Court of Justice ("ICJ Statute"), Flores, 414 F.3d at 250; see, e.g., United States v. Yousef, 327 F.3d 56, 100-01 (2d Cir.2003). In the case, Abdullahi v. Pfizer, Inc., 562 F. 3d 163 (2009), the court reasoned: "the customary

international law prohibits among other things, involuntary medical experimentation on humans . . . without their consent or knowledge"

118.1. The Nuremberg Trials judgment concluded that "manifestly human experiments under such conditions are contrary to the principles of the law of nations as they result from usages established among civilized peoples, from the laws of humanity, and from the dictates of public conscience"

118.2. The American tribunal's conclusion was that "an action that contravened the Code's first principle constituted a crime against humanity and is a clear indication of the international legal significance of the prohibition on nonconsensual medical experimentation"

118.3. As Justices of the Supreme Court have recognized, "the medical trials at Nuremberg in 1947 deeply impressed upon the world that experimentation with unknowing human subjects is morally and legally unacceptable."

118.4. *United States v. Stanley*, 483 U.S. 669, 687, 107 S.Ct. 3054, 97 L.Ed.2d 550 (1987) . . . "the universal and fundamental rights of human beings identified by Nuremberg - rights against genocide, enslavement, and other inhumane acts - are the direct ancestors of the universal and fundamental norms recognized as *just cogent*," from which no derogation is permitted, irrespective of the consent or practice of a given State." [Siderman de Blake v. Republic of Arg., 965 F.2d 699, 715 (9th Cir.1992) (cited in Sampson v. F.R.G., 250 F.3d 1145, 1150 (7th Cir.2001), also see, Nuremberg Trials, vols. I and II transcript and the DVD, "Nazi Concentration Camps" the film shown at the Nuremberg Trials.]

119. That the State of Idaho is a "closed" government wherein the records about the citizens are kept sealed and requires expensive litigation in the courts to obtain records, and which has allowed the massive growth of totalitarian fascism, and, the danger is that it is hidden deep in the government within the government, and making themselves known only when one becomes the unsuspecting victim of their extremist beliefs in genocide, racism, and physician-assisted suicide and forcible euthanasia.

120. That in the Matter of Brownstein v. Morris, 25 Misc. 2d 731 (1960), NY, the Supreme Court stated "The court may not close its eyes to the fact that the Nazi movement is being sponsored in many parts of this country."

121. That the Nazi Germany doctors began their Euthanasia Program, T4 (code for TREL, Hitler) with disabled children being starved with "little or nothing to eat" and then used Opiod narcotics as their drug of choice to Forcibly Euthanize the victims and expanded T4 to adults held captive secretly at their psychiatric hospitals, and who were chosen based on their religion, along with those who were homosexuals, disabled, and those with dementia, and others prejudged unfit to live. The T4 was successful since "no" one did anything to stop them while it spread across nations in Europe, and by the end of World War II, over four million innocent souls had been Forcibly Euthanized according to the transcript of the Nuremberg Trials. Four Million.

122. That after the Forcible Euthanasia at SLH, Lorenda Knight closed and sealed the State's APS case with the conclusion "Risk Reduced."

123. That this is the first documented case of Forcible Euthanasia in America since it was written in the Medical Records of SLH. And there will be more nationwide if their success is allowed to continue without any concern nor any consequences.

124. That Ms. Charo Rowley did not attend the hearing and did not respond to any of the court proceedings and was defended and supported by all appellate Courts.

125. My Precious Mother taught me the cause and cure of Alzheimer's disease. She was the evidence, and now I must try to convince ethical researchers what my Mother has taught us about this disease and the magnificent human brain functions and its ability to heal with the virtues of reason, courage, justice, self-discipline, patience, empathy, and compassion. I gave every effort humanly possible in the loving care for my precious Mother. We had a magnificent life together and she said that she loves God and she loves me, and, I will Forever Love God and my Precious Mother.

REASONS FOR GRANTING THE PETITION

1. That the Idaho Courts denied the fairness and justice of Due Process when my pro se pleadings were not reviewed and were summarily dismissed while the judges acted as attorneys in the Respondent's defense and with legal strategy, and with disregard to the Respondent's refusal to attend the hearing nor to answer in any way, and, thus, the Idaho Court decided the issues not in accord with applicable decisions of this United States Supreme Court. [See, the United States Supreme Court, Louie M. Schexnayder, Jr. v. Darrel Vannoy, Warden, 589 US __ (2019)]
2. That the State of Idaho demanding Hospice as "mandatory" under threat of charging me with a "Felony" and enforced by violent martial law and kidnapping "healthy" family members from home, while the Federal Statutes clearly state that Hospice is "Optional" and may be withdrawn at any time, violates the US Constitution.

3. That in-home Hospice, funded under US Medicare, is being used in the State of Idaho, Montana, and Oregon for covert Forcible Euthanasia in a physician-assisted surrogate suicide movement that has massive roots and is spreading nationwide.

4. That Respondent Charo Rowley's Court Visitor Report/Supplemental Order, which supported the State of Idaho in completing the Death Penalty of my Mother, being unconstitutional and illegal under Federal, State, and County laws, precludes Ms. Rowley's payment for services rendered.

5. That the financially poor are treated differently than others, and, thus, Economic Discrimination the last frontier of the Bill of Rights to be discovered.

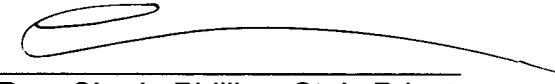
6. That the measure of the value of one's life is not by the amount of money, but by the amount of Wisdom Virtues. Our legal system is closed to the common people and as long as Economic Discrimination is practiced by the legal system, there will be no Wisdom Justice and the scale's measure of unequal justice is reflected in the unresolved issues of wild society while the quest to be the alpha rules.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Date: May 1, 2021


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