

No. 21-5781

ORIGINAL

Supreme Court, U.S.  
FILED

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OFFICE OF THE CLERK

IN THE  
SUPREME COURT OF THE UNITED STATES

ADELAIDE ZINDLER — PETITIONER  
(Your Name)

vs.

U.S. SOLICITOR GENERAL — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

DISTRICT OF COLUMBIA APPEALS COURT  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

ADELAIDE ZINDLER  
(Your Name)

125 15TH STREET, N.E., #4  
(Address)

WDC, 20002  
(City, State, Zip Code)

202.578.3083  
(Phone Number)

## Questions

Why were the Respondent and I, as civilians, permitted to get married and renew our vows on an active military carrier, bringing family and friends aboard as our guests, having a military command including the ship's Captains as our personal attendants?

Why was the Respondent permitted to manipulate the Bahraini legal system to obtain Islamic judgments against me and my daughter by defaming my professional reputation in pediatrics, as well as my personal character as a mother, and why did the Embassy, State Department, U.S. Courts, and others back him, in violation of our civil rights, International human rights, right to due process...?

Why do so many high-ranking military officers, government employees and foreign service workers all "owe him one" as he put it, and how do these American tax funded relationships promote the purpose for which our dollars are allocated to these public servants?

Why have so many Bahraini officials, Obama-Biden appointees, unelected employees in the U.S., overseas, in D.C., even carrying into the Trump, and now Biden-Harris administrations acquiesced to the Respondent's whims in obstructing our ability to receive justice, despite us being American citizens sent on official U.S Department of Defense business?

Why are judges across the country permitted to sit on the bench without oversight or accountability, when their rulings put our children in harm's way, get them trafficked, cause them to commit suicide... and despite judicial officers being jailed for these illegal court order schemes filmed in the 2013 documentary, Kids for Cash, why are they able to simply override sentencing to wound up back on our streets?

## LIST OF PARTIES

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

## RELATED CASES

ZINDLER V. ZINDLER, No. 20-FM-0099 DISTRICT OF COLUMBIA  
COURT OF APPEALS JUDGMENT ENTERED JULY 22, 2021  
Appendix A, p1 of 4

ZINDLER V. ZINDLER, No. 2018 DRB 002297 SUPERIOR COURT  
OF THE DISTRICT OF COLUMBIA JUDGMENT ENTERED MAY 20, 2020  
Appendix B, p13 of 29

ZINDLER V. ZINDLER, No. 2018 DRB 2297 SUPERIOR COURT  
OF THE DISTRICT OF COLUMBIA, JUDGMENT ENTERED NOVEMBER 6, 2019  
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ZINDLER V. ZINDLER, No. 2018 DRB 2297 SUPERIOR COURT  
OF THE DISTRICT OF COLUMBIA, JUDGMENT ENTERED DECEMBER 20, 2018  
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ZINDLER V. ZINDLER, No. 2018 DRB 2297 SUPERIOR COURT  
OF THE DISTRICT OF COLUMBIA, JUDGMENT ENTERED AUGUST 23, 2018  
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ZINDLER V. ZINDLER, No. 7/06042/2016/02 JUDGMENT ENTERED  
29/03/2018 Appendix C, p1 of 19 KINGDOM OF BAHRAIN  
ISLAMIC AFFAIRS ? WAQF COURT

RELATED CASES CONTINUED...

ZINDLER V. ZINDLER, NO. 4/17296/2015/02 KINGDOM  
OF BAHRAIN ISLAMIC AFFAIRS { WAQF COURT JUDGMENT  
ENTERED 30/6/2015, Appendix C, p 12 of 19

ZINDLER V. ZINDLER, NO. 4/17296/2015/02 KINGDOM  
OF BAHRAIN ISLAMIC AFFAIRS { WAQF COURT JUDGMENT  
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ZINDLER V. ZINDLER, NO. 7/06042/2016/02 KINGDOM  
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Illegal sharia orders issued under false pretenses since DOD contractor prequalified me to continue homeschooling my child while overseas to which he agreed, it included paying me \$20,000 a yr.

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When his claim that I absconded failed then he claimed I was mentally ill.

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He went further to say I had no proof of mistreatment, child abuse... Yet sending a child with a 1-way ticket back to the U.S. with a mother he pretends is mentally ill to be left homeless are each examples of willful neglect and abandonment.

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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**

☐ For cases from **federal courts:** N/A

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

☐ reported at N/A; or,

☐ has been designated for publication but is not yet reported; or,

☐ is unpublished.

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

☐ reported at N/A; or,

☐ has been designated for publication but is not yet reported; or,

☐ is unpublished.

☒ For cases from <sup>COUNTRY</sup>~~state~~ **courts**

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

☒ reported at KINGDOM OF BAHRAIN MINISTRY, JUSTICE ISLAMIC; or,

☐ has been designated for publication but is not yet reported; or,

☐ is unpublished.

The opinion of the DISTRICT OF COLUMBIA SUPERIOR court appears at Appendix B to the petition and is

☒ reported at WASHINGTON, D.C.; or,

☐ has been designated for publication but is not yet reported; or,

☐ is unpublished.



## JURISDICTION

☐ For cases from **federal courts:** NONE

The date on which the United States Court of Appeals decided my case was N/A.

☐ No petition for rehearing was timely filed in my case.

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

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

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

☒ For cases from **state courts:** D.C. APPEALS COURT

The date on which the highest state court decided my case was 7/22/2021.  
A copy of that decision appears at Appendix A.

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

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

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

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

### EXHIBIT B

FRIDAY, JUNE 7, 2019

EMAILS FROM RESPONDENTS ATTEMPT TO TAKE UNFAIR ADVANTAGE OF MY PRO SE STATUS BY THREATENING ME UNLESS I LET HIM HAVE PHYSICAL ACCESS TO THE MINOR CHILD, DESPITE PERMANENT CONSENT CUSTODY ORDER AGAINST IT.  
~~Exhibit~~ Appendix B. November 20, 2018.

### EXHIBIT D

EVIDENCE OF RESPONDENTS FALSE CLAIMS THAT THERE WAS NO PROOF OF ABUSE

SAFE SHORES LETTER. EXHIBIT D

DISTRICT OF COLUMBIA PUBLIC SCHOOLS OFFICE OF SPECIAL ED. EXHIBIT D  
MSP LETTER OF ADMISSION BASED ON HUMAN TRAFFICKING, SEX ABUSE... EXHIBIT D

### Exhibit E

DEPARTMENT OF STATE AMERICAN CITIZEN SERVICES, OIG EXHIBIT E  
U.S. DEPARTMENT OF JUSTICE, CIVIL RIGHTS DIVISION CRIMINAL SECTION  
EXHIBIT E

OFFICE OF CONGRESSWOMAN SUSAN A. DAVIS, COMMUNITY REPRESENTATIVE  
EXHIBIT E

PHOTOS OF MY CIVILIAN WEDDING TO RESPONDENT ON  
BOARD ACTIVE MILITARY CARRIER

### Exhibit F

EVIDENCE OF RESPONDENT'S FALSE CLAIMS THAT I ABUSED,  
NEGLECTED, DID NOT TAKE CARE OF OR ALLOW MINOR  
CHILD TO LEARN...

MY PROFILE AND ENDORSEMENTS

MINOR CHILD'S PROFILE AND LETTERS OF REFERENCE

## Petition / STATEMENT OF THE CASE

The U.S. Department of Defense sent my 7-yr old daughter and I to the Middle East for a 2-yr contract assignment, as dependents of retired civil servant, Peter Henry Zindler. Once we were on foreign soil, suspecting nothing, I saw my professional reputation and character slandered by my husband and pastor, who rapidly obtained an Islamic divorce and custody without a trial and largely without my knowledge or presence, nor Embassy representation, or a single male witness... How? According to sharia law females are *not* human, and according to Consular, Todd Teddy we were not high profile enough to receive help from the Embassy, and according to his replacement Consular, Jeff Austin, the State Department's legal team reviewed our case and saw no problem with the sharia compliant court orders.

*To Americans (morality) means... equal rights for men and women...  
but these are contrary to the moral code of Islam.*

Council on American-Islamic Relations (CAIR)

Countless government agencies stood in the way of me returning to America with my child, cumulating in a six-year ordeal. Then both D.C.'s Superior and Appellate courts ordered me to reintegrate her back with the Respondent, as one judge after the other refused to acknowledge forensic evidence, his routine defiance of court orders, multiple and severe forms of child abuse and neglect, etc., adding another four years of homelessness in D.C. This fact pattern provides the basis for the jurisdiction of the U.S. Supreme Court to review both the foreign and U.S. divorce, custody and child support orders, as well as the United States' role in obstructing justice, overreaching its authority, and subverting the Constitution.

From the U.S. Embassy to Bahrain, the U.S. State Department, the U.S. Passport office, the U.S. Department of Justice, Houston International Airport security, the Houston Child Protective Service, the FBI, the D.C. Superior and Appellate Courts, Joe Biden, Barack Obama and their Ambassadors to Bahrain, their Consular Todd Teddy and Jeff Austin and their staffer(s), U.S. Naval base Bahrain, U.S. Naval Bahrain school administration, Congresswoman Susan Davis, Senator Barbara Favola, DOD contractor, Camber Corporation, to the Virginia Williams Center and beyond.

The case could have national significance given that these same abuses are also happening to millions of us according to the National Association of State Courts. This opens the possibility of harmonizing conflicting decisions in the federal circuit courts, and/or even providing for precedential value by resolving the issue of parents and children sustaining irreparable damage from actions taken by the Executive, Legislative and Judicial branches of our government including judges like Ciavarella and Conahan, who were finally put behind bars.

Timeline

December 20, 2018,	Permanent consent custody orders issued requiring the child's wishes and preferences to be considered prior to reintegration. Superior Court overrode consent ordering reintegration without the child's wishes and preferences being heard prompting her to create a suicide plan.
May 20, 2019,	Superior Court again affirmed their decision to override the original consent order and reintegrate the child with the Respondent, despite her suicide plan, forensics, testimony...
July 21, 2021,	I filed a notice of motion for contempt of child support.
July 22, 2021,	Appellate court affirmed the lower court's decision in less than 24-hrs of my contempt filing also ignoring the original order and the child's suicide plan caused by the lower court stating, "appellant gave her consent... absent a showing of good cause to set it aside, such as fraud, duress, or mistake.

In its opinion the Court ignored the suicide plan that resulted from the reintegration order (a good cause), it ignored my overwhelming distress and dismay at the court's actions, agreed to only under the threat of imprisonment, and the ease with which the judge and Respondent's lawyer seemed to side against me during the hearing, even continuing after the hearing ended and I went to the bathroom and so happened to pass by the courtroom on my way out of the building finding them still engaged. My state of mind while focusing the weight of my attention on giving my child hope and a reason to live, assuring her that I would not leave her, but would take our case to the U.S. Supreme Court and do whatever it took to prove that her life is valuable...

D.C. Superior Court Code of Judicial Conduct Rule 2.15 Responding to Judicial and Lawyer Misconduct. (C)

*A judge who receives information indicating a substantial likelihood that another judge has committed a violation of this Code shall take appropriate action...*

The lower court(s) actions run counter to the Judicial Conduct Rule above.

Continuing, "...No showing of good cause has been made... and the record reveals no reason why the consent judgment... should not be enforced as written..." This determination ignores the Bahraini custody order that prompted the lower court to override the Islamic ruling in Bahrain that did not meet the threshold for admission in the United States. This was the illegal order that began the case began with. This statement also ignores all the Respondent's fact pattern over the years in the courts in both countries in defaming my character to achieve custody despite admitting in Court that he has never done anything for the child as evidenced by him repeatedly being in contempt of court. Further stating "*the correct venue to raise a fresh challenge to the validity of the parties contract modifying the original 2018 consent agreement... is the Superior Court.*" Yet I was warned that if I did not exercise and abundance of caution I would lose, given the fact that my pro bono lawyer himself had to pull a case from Steven Wellner's courtroom before his client could receive justice. Also affirming his nefarious intentions toward children, the founder of Courtney's House shared that this same judge has hurt child victims of trafficking and denied their rights leading to the creation of Hope Court to get around judges like him, because their judicial misconduct against children is that prevalent.

Further stating "*appellant has failed to show... an abuse of discretion by the trial court in failing to hold appellant in contempt, a decision that we could reverse...*" Yet my numerous contempt filings all of which were rejected, demonstrate my fervor in trying to show cause for Respondent's fact pattern of being in contempt of court, to which the lower Court concluded that I was "*nitpicking*", refusing to discuss the forensic evidence or allow testimony, denying us due process in an abuse of discretion that only added to the trauma that we have sustained in our decade of trying to get justice, due to judges showing a total disregard for the rule of law, tilting the scales of American justice against my child and I.

Refusing our right to return to the U.S., for Embassy Consular Jeff Austin to claim that an Islamic judgment had been validated by the State Department's legal team, when the D.C. lower court readily overruled it, appears to be a gross abuse of power. Presenting proof of our one-way tickets back to America with -0- dollars to provide food, clothing and shelter for a minor child constitutes extreme neglect. Attempting to dismiss my claim for child support at the lower Court constitutes neglect. Not honoring the Court orders unless compelled constitutes neglect. Refusing to allow the child an education for nearly a decade constitutes neglect. When asked in the lower Court what he has ever spent on his child, to answer "*Nothing*" is an admission of severe neglect.

*If, in addition to this immense advantage, the ambition of the members should be stimulated by the separate and independent possession of military forces, it would afford too strong a temptation and too great a facility to them to make enterprises upon, and finally to subvert, the constitutional authority of the Union... As far as an army may be considered as a dangerous weapon of power, it had better be in those hands of which the people are most likely to be jealous than in those of which they are least likely to be jealous. For it is a truth, which the experience of ages has attested, that the people are always most in danger when the means of injuring their rights are in the possession of those of whom they entertain the least suspicion.*

*people are most likely to be jealous than in those of which they are least likely to be jealous. For it is a truth, which the experience of ages has attested, that the people are always most in danger when the means of injuring their rights are in the possession of those of whom they entertain the least suspicion.*

Federalist Paper #25, by Alexander Hamilton

Hamilton's prophetic warning foretold our current circumstance. In fact, On May 21, 2020, David Sachar gave a presentation on investigating judicial misconduct for UNODC, in which he emphasized the importance of transparency and allowing victim stories to be told.

After we left America in 2012, my child experienced multiple and severe abuse, and the neglect continues at the hands of the Respondent who remains in contempt of child support orders. She has never received the education, vacations... promised by DOD contractor Camber Corporation as part of the government benefit package agreed upon prior to the acceptance of their 2-yr overseas contract assignment. It was understood that having homeschooled my daughter for 2 years prior and having far exceeded their stringent pre-qualifications to continue do so once overseas, they would pay me \$20,000 a year, according to Michelle Callan, Program Control Manager. At no time before, during or after our move did the Respondent object to these terms being fully aware of them. Yet at no time and in not a single year did they do any of it. Suddenly to take my child away from me, once we were outside of the U.S., he filed a claim for sole custody in Bahrain's sharia law court writing that I refused to let her go to school, was not a fit mother, neglected her, etc.

I learned that foreign service workers are required to get an annual family review to ensure that they are doing well and not being abused, neglected, or isolated. We were provided with nothing of the sort for 6-yrs, while the Respondent projected onto me what he was doing to her.

My actions have always been and remain the direct opposite of the Respondent's false claims. The only time in my child's life when she was not cared for was when she was in the care of the Respondent during a 2-week a visit to Wisconsin when she was preschool age, and when I was away for a week attending to my mother's affairs upon her passing. The photos of her appearing to be homeless without even her hair being combed once were appalling to see.

When my daughter has been heard and the evidence reviewed it will become clear that despite being homeless for nearly a decade because of the Respondent and his vast government network I have protected, cared for, and educated her from shelter to shelter, using every opportunity to maximize our surrounding. From eliciting a chef in one location to let my daughter be her assistant, encouraging staff in another to speak to her in Arabic, requiring her to engage residents from many nations creating games, developing an exercise program, distributing new clothing donated by our Muslim friends to other trafficked women, assisting tutors in teaching younger students reading skills, to volunteering at a book signing event for Supreme Court Justice Sonia Sotomayor where they took advantage of a photo op together. It would take more time than this filing allows to outline all the ways I continue to override our circumstance to enable my child to

practice today as if this ordeal is already behind us, not to mention her life of co-working alongside me prior to leaving America which has been well documented as our reference letters, endorsements, audio and video testimonials attest. Of the few who have been made aware of our dire circumstance, none believe it due to her strong debate skills, National Scholastic award in writing, her contagious passion for life...

However, contrary to the Court's mandate to "*serve the best interest of the child*" for more than a year the child support orders have been violated, with automatic deposits from the Court's clearing house continually being reduced by hundreds without warning or explanation. Upon inquiry I was told it was simply out of their power to change it. Then when the payments stopped completely, I filed a motion for contempt. Less than 24-hrs later D.C. Appeals Court emailed to affirm the lower court's decision to reintegrate my child with the Respondent, ignoring all that is contained in this petition. As a result, my ability to educate my child has been willfully thwarted again and again.

*We hold these truths to be self-evident, that all men [and woman] are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty, and the pursuit of Happiness.*

Preamble to the Declaration of Independence

Our rights have been under assault for a decade as her childhood draws to a close. For both lower courts to dismiss our claims as a "*failure to show cause*" is incomprehensible. Unwilling to allow her life to be snuffed out, we now file this case with the U.S. Supreme Court.

Congress enacted the Adoption and Safe Families Act of 1997 requiring that reasonable efforts to move a child from foster care into adoption should not be required if a court of competent jurisdiction has determined that,

*"the parent has subjected the child to aggravated circumstances i.e.: may include but need not be limited to abandonment, torture, chronic abuse, and sexual abuse..."*

While she is not adopted this rule applies in our case. Leaving my child homeless, sending us back to America with one-way tickets. and penniless is abandonment. Refusing her an education, or new clothes, pulling her into the shower with him, sitting her on his lap to watch pornography, taking her to a makeup artist to pose in lingerie, with grown women... are acts of both incest and sexual abuse, withholding food, forcing her to do labor for free... are each separate accounts of chronic abuse and neglect. But instead of acting as courts of competent jurisdiction and reviewing the evidence and hearing testimony, both lower courts generated rulings that caused her to plan her own suicide. Had I not taken a fierce stand against it her contribution to helping form a more perfect union would not be possible, because she would be dead by now.

Similar judicial misconduct has resulted in jail time and indictments that have direct relevance to our case.

On September 9, 2009 in Case #09-CR-272 a Pennsylvania Grand Jury charged judges Michael T. Conahan and Mark A. Ciavarella, Jr. with *"abusing their positions to enrich themselves... violating the fiduciary duty they owed to the citizens... and to the judiciary... secretly deriving... improper income... entering into agreements guaranteeing placement of juvenile offenders with PA Child Care, LLC... closing the county-run youth detention center... granting motions to seal the record... agreements worth... approximately \$58,000,000... in the form of cash, checks, and wire transfers to pass through intermediaries... causing false records to be created... "Placement Guarantee Agreement(s)" knowingly, intentionally and willfully combine, conspire, confederate and agree together with one another, and together with other persons known and unknown to the Grand Jury, to defraud the United States by impeding, impairing, obstructing and defeating the lawful Government functions... each count constitutes a separate overt act in furtherance of the conspiracy... requiring them both to forfeit to the United States all property, real and all property traceable to such property... Pursuant to Rule 32.2, Federal Rules of Criminal Procedure..."*

While the underlying reason for the coordinated effort among so many agencies in our case is not known, the sentencing and indictments above provide a basis from which to launch a forensic examination to determine the nature and substance of such highly leveraged and nefarious efforts against my child, and whether there are similar motivations at play.

In addition, within two short weeks of fleeing Bahrain, CPS Houston deleted the report we filed with police at the international airport, according to the Supervisor and the Director I spoke with.

Once we arrived in D.C. and were eventually taken to Virginia Williams, upon speaking with the Respondent the case worker became determined to have me arrested calling in numerous teams of police, each upon speaking with me attempted to inform her that she was acting on disinformation.

As Americans sent overseas on official U.S. business who had to find our own way back, we were left unprotected by officials who were supposed to secure our liberties.

While I have focused exclusively on the injustice my daughter has experienced, I invite the Court to consider how my own trauma has had to be suppressed to protect my child for the last 10-yrs. When I filed for divorce in the lower court, my petition was for the maximum remedy as compensation for my losses. In response, because I did not request alimony, the judge stated that there was nothing further that I was entitled to.

Article III, Section 1, of our U.S. Constitution states that justices of the Supreme Court and other federal judges *"shall hold their Offices during good Behavior"* and their removal has been based on behaving in an *"arbitrary, oppressive, and unjust"* manner on the bench.

*...whenever any Form of Government becomes destructive of these ends, it is the Right of the People to alter or to abolish it, and to institute new Government, laying its foundation on such principles and organizing its powers in such form, as to them shall seem most likely to affect their Safety and Happiness.*



Preamble to the Declaration of Independence

*For Hashem is our Judge;  
Hashem is our Lawgiver;  
Hashem is our King;  
He will save us.*

Isaiah 33:22

  
Adelaide Zindler  
Mother/Petitioner

**FOR SELF AND**  
  
Minor Child/Petitioner

Signed on this 27<sup>th</sup> day of August 2021

## Reasons for Granting the Petition

Despite the U.S. Department of Defense (DOD) sending us to Bahrain on a temporary 2-yr contract assignment, it took 6-yrs to finally flee the Middle East with my child, so why the lower court(s) failed to address what brought us there to seek justice, and why she has been denied curriculum or school for a decade, and why the Respondent fought to avoid paying child support when she remains homeless, and repeatedly lied to the courts with impunity, and tried to impose sharia law in the U.S.? Then why did the judge reduce the child support because it? Why did both courts deny us our constitutional rights, due process, child safety and what is in her best interest, leading to the suicide plan my daughter developed seeing that after 2-yrs the court would force her back with the Respondent whose abuse led to her trauma-based IEP, and 2 suicide watches through Children's National Hospital.

The lower court(s) decision conflicted with Case #09-CR-272 where a Pennsylvania Grand Jury sentenced two judges to prison for trafficking children, for abusing their positions and for violating the fiduciary duty they owed to the citizens, setting the precedent that should have informed the judicial conduct in this case.

The Supreme Court's decision in this case holds significance not only for me and my daughter, but also for the millions of other Americans like me. According to the National Association for State Courts there are millions of us who are having our children removed similarly by judges in the U.S. against the law.

In deciding to reintegrate my child with the Respondent who has no intention of returning to America, the lower court ignored their own orders that overruled sharia law of Bahrain, it ignored the false pretenses used to take custody away from me, it ignored years of the Respondent being in contempt of court orders, it ignored all of my pleas to have the evidence addressed in the court room, it ignored the original consent custody order requiring my child's wishes and preferences to be considered, and it ignored why we filed our appeal within 24-hrs of arriving on Capitol Hill after fleeing Bahrain for her safety, arriving with only one way tickets, being homeless and penniless.

This case holds both National and International significance because like the Obama-Biden administration that worked for 6-yrs to prevent me from returning to America with my child, the same administration continues to make headlines this week, with executive orders that traffick children across the borders in America, Afghanistan, Latin American and across the globe. By the U.S. Supreme Court deciding in this case, the world will know that the highest court in the land does not ignore the safety of children and parents who fight to protect them. At a critical time when we are all taking note of who will protect the innocent, the U.S. Supreme Court is poised to prove that it operates not as a servant of the Executive, but as a co-equal branch of our U.S. government in restoring the deeply tarnished reputation of the judiciary.

### CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

ADELAIDE ZINDLER

Date: 8/27/21