

No. 21-6599

ORIGINAL

Supreme Court, U.S.
FILED

NOV 24 2021

OFFICE OF THE CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

Julienne Njabbou Tchoua — PETITIONER
(Your Name)

vs.

Jennifer Sullam, Esq. Department of Human Resources
Office of the Attorney General "et al." — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

COURT OF APPEALS OF MARYLAND

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

PETITION FOR WRIT OF CERTIORARI

Julienne Njabbou Tchoua
(Your Name)

80 B Bureau Drive Apt 311
(Address)

Gaithersburg, Maryland, 20878
(City, State, Zip Code)

240-474-6506
(Phone Number)

QUESTION(S) PRESENTED

Why the Court of Appeal did not considerate the fact that I have been mentally stable for more than 3 years and am dedicated to maintain this status?

Is the Department of Child Welfare Service through the social workers did not reported the real interactions and relationship that exist between my daughter Joyce and I because they wanted to get my parental rights terminated?

Can separation of the child from their origin root meaning biological family can be devastated especially for the child where in near future wants to know exactly where he or she is coming from?

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:

- Jennifer Sullam, Esq. Department of Human Resources, Office of the Attorney
- Sara Furlow, Esq. Legal Aid Bureau, Child
- Isabelle Raquin, Esq. Father

RELATED CASES

Circuit Court for Montgomery County

Case No 6-Z-20-00006

TABLE OF CONTENTS

OPINIONS BELOW	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	
STATEMENT OF THE CASE	
REASONS FOR GRANTING THE WRIT.....	
CONCLUSION.....	

INDEX TO APPENDICES

APPENDIX A Opinion of the Court of Appeals of Maryland
Petition Docket No. 187
September Term, 2021

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

STATUTES AND RULES

OTHER

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

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

OPINIONS BELOW

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

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

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[] is unpublished.

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

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

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

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

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

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

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

JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

No petition for rehearing was timely filed in my case.

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

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

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

For cases from **state courts**:

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

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

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

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

STATEMENT OF THE CASE

In this case I had been judge on the facts that I have depression and been hospitalized several time in the past. Instead to look at my current situation where I am stable. This can be just a fact of discrimination due to my mental disability. in fact, they did not look for how good and how long I had been doing but based on issues of the past to get my parental rights terminated.

During visitation with my daughter Joyce, I did my best to show how a good mother I can be for my child, but the social workers with many restrictions and their determination to terminate my parental rights did not reported the real interactions that I had with Joyce. For example, Joyce had told me many times that she would like to come with me to my house. At the end of some visits, she usually cried and one time she attempted to run and following me when I was leaving at the Piccard drive office. My daughter shows me the love that she has for me. She usually said mommy I love you, you are the best. We played and enjoyed time together. All of I am writing here social workers never reported. I was no surprised when the Department refused that Psychologist Doctor of my counsel assists to at least one of the visits to see how is the interaction with my kids. They were so focused on their plan to get my children adopted that they made up the story that I show to Joyce a picture of Grace's bed during the visit at the visitation house. They assumed that I told her that was her bed that she would have when she comes to me. First of all I had restrictions from the social worker to say anything to my children like give them false promises. Shihoh claimed that she was not there that day at the visit and her coworker Emily was distracted when I supposedly show her the pictures. This was completely a false accusation, I never show pictures of bed to Joyce, the true is Joyce asked to see pictures on my phone and I gave her the phone and let her go through pictures while I was playing with her sister Grace. Both of the social workers were sitting at the table watching what we were doing.

Furthermore, they never reported the way Joyce acts when she see me for the time she gets out of the car. Joyce runs to me saying mommy with a lot of happiness and joy on her face. She said to me, I missed you and I replied same thing to her with hugs and kisses, she loved it. They are many great times we had on visits but these people never had the honesty to report the real relationship that exist between us. All of these has the consequence of taking my children away from me for unrealable reasons. I swear the God I had been through so much difficulties but never harm or neglect my children. They judged me on the fact that I had been hospitalized in the past, so who wants to be sick or even asking for a disease? I am sure no one, this is just unfair, I know I have this health issue and admitted long time. Since Joyce birth, when the doctor diagnosed me and told me you need to take care of yourself then you will get your child back after. Since, I had been doing my best, today I am doing better I am taking care of myself and I know I am able to care for my children. The Department had time to work with me for reunification back in 2016 working with Mrs. Jillian, she saw how dedicated parent I am to my child, she allowed me overnights visits which went very well with Joyce, I took care of her without any problem. Which was the completely opposite way when I started working with the third worker who stated at her testimony that I told her I am sick because they took my children, that I don't need to take medications. How come I know you are the worker of my children case and your plan is to get them adopted and I would tell you stupid declarations, she is just a liar and that was just one of her lies on the bench she is a maker of false accusations.

The lawyer of Department during the trial asked me if my mental health has not been an obstacle to get my children back. And I replied No because his stated on his question Has Not Been and I believe no was the answer because saying yes meaning it has not been an obstacle. I said no because I know and believe it was the problem to get them back, I know it since the beginning that Joyce has been away from me. So that the way I understood his question, but the court thought I am not conscious of my situation. Oh no, I know it is the problem, but from working on it with my therapist and psychiatrist, I am doing great. My current therapist even stated that I don't appear to her like someone who have mental health issues. I am grateful for it because I know where I am coming from and I will do my best to stay stable and I am commit to be well for myself and others.

Other thing very crucial is this separation has definitely affected my family. My daughters are the first grant daughters in my family and they are loved by my family members. I have met several people in this state looking for their origin family, some of them being adopted and growing up being maltreated by either foster or adopt parents. In the most of the cases you see them leaving those homes they became homeless, because they are going to look for their real family. I know this is painful, I feel it, theses are the only children that God has giving me and being taking away for no substantial reasons. I cannot imagine how my daughters are feeling, I know Joyce and Grace are missing me and probably have questions of where I am, why I am not in their lives, because they know I am their mommy. I don't want my kids to be out there in future looking for me. I want to raise them because that how God decides it. He made me their mother and I should be the one to take care no strangers especially when I have done nothing to them. I love my children with all my heart and I am determinate to do all is take to get them back to my care.

REASONS FOR GRANTING THE PETITION

1. The first reason that I should get my children back is because I am currently doing good with my situation. I am mentally stable, I am working and I live by myself.
2. Having my children back would bring more happiness, joy, love, peace for my kids, my family and I.
3. This will make things right on the way it supposes to be as family should be reunify not separated.
4. Reunification will definitely avoid situation where my children will have questions about their origin.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Julienne Njabbou Tchoua

Date: November 24, 2021