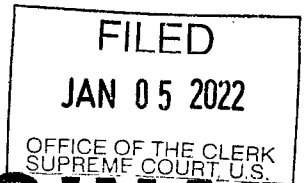


No. **21-6943**



IN THE
SUPREME COURT OF THE UNITED STATES

ORIGINAL

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

(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

It is fair that the Montgomery County and Appeal Courts did not considerate the fact that I had been mentally stable for 4 years?

Isn't true that the Judge of Montgomery County Court did a discrimination by terminating my parental rights based on the fact that I have mental health problem even though I am stable and have not done anything wrong to my child?

Can separation of biological parent from a child can have consequences in live of the child when in future her will eventually have questions and looks for her natural parent?

LIST OF PARTIES

- [] All parties appear in the caption of the case on the cover page.
- [x] 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 General
 - Sara Furlow, Esq. Legal Aid Bureau, Child Attorney

RELATED CASES

Circuit Court for Montgomery County
Case Nos. 6-Z-17-00033 & 6-I-16-0056

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 & Unreported Opinion of the Court of Appeals of Maryland Petition Docket No. 276 September Term, 2021	Nos. 1283 & 1404 September Term, 2020
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,
☒ 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 20th December, 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

This case is extremely unfair because of the fact my lovely daughter Grace has been taking away from me by tricky and foolishness manner of the department. I was caring for my baby and suddenly on September 20, 2017, the social worker of Baltimore called me to come for visit. I replied that I am not home, I took Grace to her doctor appointment and will be home later. Then, she said she will be at my place at 3 PM. She shows up at 6pm and Grace was laying in her bed, this woman just told me that she came to take my baby because someone called them and said that I was still sick. I asked her who gave her that information, but she did not give me any explanations. I just saw the parametric people get in and put me in the ambulance straight to Johns Hopkins like a prisoner. I was fine with my baby and have not been sick or diagnosed by anyone that week. I have no idea how and based on what reasons they took my daughter. The same social worker asserted me when I gave birth to Grace and was ok with the assessment. I was surprised at the hearing to see and heard bunch of people from Baltimore Department testify that they sent different workers to the community where I was with Grace. Moreover, they told untrue stories about me and Grace. I remember clearly that one and only one social worker came to the hospital after Grace was born. She asked me questions and also came to the place when I was staying. Manus facts, she attested that all were alright. Anyway, that is the true story of my separation with Grace. After that night, I was traumatized but God got me through it. I decided to fight for my children because they mean a lot to me. I loved them with all my heart. I am sure they do too.

My baby Grace is a loving child, she is really quiet and serious. We did not have lot occasions to be together but the time we spent together are precious to me. During visits at the visitation house in Rockville, she loved drawing and was mostly hang me her colors crayon for me to hold it. For her 2nd birthday, we went to Chuck E. Cheese in Rockville, she loved it, she played with me and her sister Joyce. That day she called me "Mommy" for the first time. I brought a cake, she loved it, yes! Cake is one of her favorite foods. They sent me a video where Grace said at the end "Mommy that is me Grace". So, she wanted me to know that is her on the video as to let me know that she thinks about me.

I love my children all I want for them is to be safe and raise them as my parents did for me. God did not make me to be their mother for them to be raise by strangers especially when I have not done nothing wrong to them and I am still alive. I have a large family, in fact, my cousin who is here got involved in these cases. But this judge still did not allow him to be a source of support for my daughters even though he is a direct family member to them. Which I think it is completely unfair.

My mother is coming here to live with me, and she will be definitely a source of support for my daughters. What I am asking is a chance to care, raise my daughters and I willing to do anything it will take for it. Because having my daughters is the most beautiful gift that Lord our God has sent me and for it to be taking away by unfairly reasons is really hurtful. I believe anything is possible and I will not give up on my daughters for nothing in the world.

REASONS FOR GRANTING THE PETITION

1. The first reason that I should get my children back is because I am currently doing fine with my situation. I am mentally stable, I am working and I am independent.
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: January 5th, 2022