

No.

21-7515

Supreme Court, U.S.
FILED

DEC 27 2021

OFFICE OF THE CLERK

In the Supreme Court of the United States

PAULA ANTONIA GORDON,

Petitioner

v.

LESLIE NELSON PARKER,
BRITTANI LEEANN FINCH,

and

DEPARTMENT OF CHILDREN AND FAMILY SERVICES,

Respondents

*On Petition for a Writ of Certiorari to the
Louisiana Court of Appeal, First Circuit*

PETITION FOR WRIT OF CERTIORARI

ORIGINAL

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QUESTION(S) PRESENTED

1. Did the family court judge commit a “severe form of human trafficking” when he threatened the child’s mother that if she did not change her sworn testimony (the married man she had a one-night stand with is possibly not her child’s father) and stipulate to his paternity, or the judge would cast the mother with court costs, DNA testing, expert fees, and have a ruling on custody “that might not be in the realms of anything you thought possible?”
2. Did the family court judge violate the child’s right to **Equal Protection of the Law** by naming a man “the natural father” without any proof thereof in the record; and in contravention of the mother’s oath to the court?
3. Did the family court judge violate the child’s and her custodial grandmother’s **Due Process** rights by refusing to join or hear the grandmother, who was granted custody in Division C, and was a party necessary to the just adjudication of the proceedings in his Division D?
4. Did the family court judge err when he found the grandmother guilty of contempt of court for violating a judgment to which she was not a party to?
5. Did the family court judge err when he issued a bench warrant and caused Grandma to serve a sixty-day prison sentence after he granted an Order of Appeal?

LIST OF PARTIES

Petitioner:

Paula Antonia Gordon,
(herein "Grandma") to R.E.P., a minor child

Respondents:

Leslie Nelson Parker (herein "LNP"),
alleged father, *original Plaintiff*,
represented by Dennis Stephen Fitzgerald, Esq.

Brittani LeeAnn Finch (herein "BLF"),
mother, *original Defendant* in F-206,930 D
(Petitioner's daughter)
Unrepresented, advised by Dennis Fitzgerald, Esq.

State of Louisiana, Department of Children and Family Services, (DCFS)
Child Support Enforcement, (DCFS-CSE),
a required party later joined

Assistant District Attorney, Prisca A. Zeigler, for
District Attorney, EBR Parish, Hillar C. Moore, III

Solicitor General of the United States

Section III. List of Proceedings

Court of Appeal, First Circuit, State of Louisiana

Appendix A

2019-1473R c/w 1514R	Parker v. Finch	06/03/2021	disposition
2019-1473 c/w 1514		07/06/2020	rehearing denied
2019-1473 c/w 1514		05/14/2020	appeal <u>dismissed</u>
2019-1473 c/w 1514 (grandma incarcerated 1/23/20)		01/28/2020	review denied
2019-1076	Parker v. Finch	09/10/2019	rehearing denied
2019-1076		08/23/2019	writ and order
2019-0465	Parker v. Finch	04/16/2019	writ and order

The Family Court in and for the Parish of East Baton Rouge, LA

Appendix B

F-215,728 C	Finch v. Gordon	12/05/2018	CUSTODY
F-215,728 C c/w 206,930 D	Finch v. Gordon v. Parker v. Finch	01/08/2019	(<i>transcript</i>)
F-206,930 D	Parker v. Finch	03/12/2019	(<i>transcript</i>)
*D. Fitzgerald authored judgments & written reasons *03/18/2019 stipulated <u>contract</u>			
F-206,930 D	Parker v. Finch	07/30/2019	(<i>transcript</i>)
		*08/12/2019	(written reasons)
		*08/27/2019	contempt jgmt.
Cost review is pending upon remand		01/23/2020	
F-206,930 D	State of La. v. Parker LASES No. 2509368-01	*06/09/2020	stipulated jgmt. child support established

Supreme Court of Louisiana

Appendix C

2021-0973	Gordon, In re: Parker v. Finch	09/27/2021	writ denied
2020-0987	Gordon, In re: Parker v. Finch	09/23/2020	writ granted
2019-1506		09/26/2019	writ denied

United States District Court for the Middle District of Louisiana

Appendix D

3:21-cv-00067-JWD-EWD	Gordon v. Greene, et al.	05/10/2021	Opinion
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Decisions of The Family Court in and for the Parish of East Baton Rouge

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APPENDIX D

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Decisions of U.S. District Court for the Middle District of Louisiana

PETITION FOR WRIT OF CERTIORARI

Paula Antonia Gordon, herein Grandma, prays for a writ of certiorari to review the judgments below.

OPINIONS BELOW

The unpublished opinions of the three-judge panel of the Louisiana Court of Appeal, First Circuit (herein La. 1 Cir.) appear at **Appendix A** to this petition.

The unpublished opinions of The Family Court in and for the Parish of East Baton Rouge appear at **Appendix B** to this petition.

JURISDICTION

The date on which the Louisiana Supreme Court denied discretionary review of my timely filed petition for a writ application was September 27, 2021. A copy of that decision appears at **Appendix C**. The jurisdiction of this court is invoked under 28. U.S.C. § 1257(a).

STATUTES AND RULES

Title 22 United States Code Chapter 78 **TRAFFICKING VICTIMS PROTECTION**

§7102. Definitions

In this chapter:

(1) Abuse or threatened abuse of law or legal process

The term "abuse or threatened abuse of the legal process" means the use or threatened use of a law or legal process, whether administrative, civil, or criminal, in any manner or for any purpose for which the law was not designed, in order to exert pressure on another person to cause that person to take some action or refrain from taking some action.

(3) Coercion

The term "coercion" means—

- (A) threats of serious harm to or physical restraint against any person;
- (B) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or
- (C) the abuse or threatened abuse of the legal process.

(7) Debt bondage

The term "debt bondage" means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

(8) Involuntary servitude

The term "involuntary servitude" includes a condition of servitude induced by means of—

(A) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer serious harm or physical restraint; or

(B) the abuse or threatened abuse of the legal process.

(11) Severe forms of trafficking in persons

The term "severe forms of trafficking in persons" means—

(A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or

(B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Title 45 C.F.R. § 303.5 – Establishment of paternity regulates the procedures in involving children under the Title VI agency. Subsections (d)(1) and (e)(1) specify the requirements for establishing paternity in contested cases. Before the relevant Louisiana statutes and codes may be applied either for filiation or inheritance, it must be ascertained if there exists an authentic act; or if there was a voluntary acknowledgment (both of which are null and invalid if no biological relationship exists.)

Louisiana Code of Civil Procedure

Art. 254. Docket and minute books

A. In addition to other record books required by law, each court shall keep docket and minute books.

B. The clerk of the court shall enter in the docket book the number and title of each action or proceeding filed in the court, the date of filing of the petition, exceptions, answers, and other pleadings, and the court costs paid by and the names of counsel of record for each of the parties.

C. All orders and judgments rendered, all motions made, all proceedings conducted, and all judicial acts of the court during each day it is in session shall be entered in the minute book.

D. An electronic record of the minutes which is not capable of alteration without indication that a change has been made may be maintained in lieu of a written entry.

Acts 1995, No. 1003, §1.

Art. 256. Minute clerk

The minute clerk of a court shall keep the minutes of the court daily when in session and transcribe them into the minute book, as required by Article 254; shall file all pleadings and documents

tendered for filing in open court; and shall perform such other duties as are assigned to him by law, the court, and the clerk with the approval of the court.

The minute clerk of a trial court shall administer the oath to jurors and witnesses and shall file all exhibits offered in evidence, when directed to do so by the court. If there are two or more judges on a trial court, its rules may require a minute clerk for each division thereof.

When a court has no minute clerk, and there is no deputy clerk available for such duty, the clerk shall perform all of the duties of the minute clerk.

Art. 1916. Jury cases; compromise agreements; signature of judgment by the court

A. After a trial by jury, the court shall prepare and sign a judgment in accordance with the verdict of the jury within ten days of the rendition of the verdict, or the court may order counsel for a party in the case to prepare and submit a judgment to the court for signature within ten days of the rendition of the verdict, in accordance with the rules for Louisiana district courts.

B. When the parties to a contested matter reach a compromise agreement which is recited in open court and on the record capable of being transcribed, the court may order counsel for a party to prepare and submit a judgment to the court for signature, in accordance with the rules for Louisiana district courts, within twenty days of the recital.

Acts 2006, No. 474, §1; Acts 2008, No. 824, §3, eff. Jan. 1, 2009.

Art. 2592. Use of summary proceedings

Summary proceedings may be used for trial or disposition of the following matters only:

(1) An incidental question arising in the course of judicial proceedings, including the award of and the determination of reasonableness of attorney fees.

...

(3) An issue which may be raised properly by an exception, contradictory motion, or rule to show cause.

...

(8) The original granting of, subsequent change in, or termination of custody, visitation, and support for a child; support for a spouse; injunctive relief; support between ascendants and descendants; use and occupancy of the family home or use of community movables or immovables; or use of personal property.

(9) An action to compel an accounting at termination of parental authority; and an action to seek court approval to alienate, encumber, or lease the property of a minor, to incur an obligation of a minor, or to **compromise the claim of a minor**.

...

(12) An action for dissolution or specific performance of a compromise entered pursuant to **Article 1916(B) or by consent judgment**.

(13) All other matters in which the law permits summary proceedings to be used.

STATEMENT OF THE CASE

This is a case about human trafficking. Petitioner's daughter (BLF) and granddaughter became easy targets after their dependency upon Title IV-D services began in 2013. The Department of Children and Family Services, Child Support Enforcement Division (DCFS-CSE), and the Division D judge in this case, have chosen to ignore the extensive legislation (federal and state) detailing the policies, procedures, and regulations for children receiving Title IV-D services, where paternity is contested. Acceptance of federal funds imposes a duty to comply with the rules so those particular children can benefit from the protection that specific legislation was written to provide. La. C.C. arts. 179, 196

See (42 U.S.C. 666 (5)(B)(i)) and (45 C.F.R. 303.5 (a)(2)(c)(d)(1)).

This contested paternity/custody case began with a violent attack upon Grandma and her granddaughter (REP) by the alleged father (LNP) on November 18, 2018. According to the scheme LNP explained to BLF earlier that same month, his intent was to "get your mom [Grandma] out of the picture." Three relatively short yet eternal years ago, naïve, gullible Grandma would have thought the facts herein sounded like a far-fetched conspiracy theory that was neither probable nor possible. Three years ago, Grandma had no fear about petitioning the courts for a redress of grievances or appearing in court *pro se*. Grandma presumed that the judges would be impartial, honest, knowledgeable, and apply the law to the case. Experience has proven her presumption not only wrong but devastatingly costly.

Grandma believes all judges involved know the laws involved in this case.

The Family Court Division D judge, opposing counsel, and the alleged father conspired to obtain a judicial determination of paternity without the statutorily required proof, in order to obtain, harbor, and control the little girl at the heart of this matter, and her mother, for illicit purposes and unjust enrichment. The March 12, 2019 hearing transcript will show that these men proceeded to harass, badger, threaten, and coerce the traumatized, type O blood group mother, unrepresented by counsel, until she signed a stipulation with the alleged type O blood group father, regarding the paternity of her type A blood group child, and that agreement was contradictory to the mother's earlier sworn testimony, as the judge grilled her in front of a packed courtroom, regarding the circumstances surrounding the time period of REP's conception.

During the three years since that shocking court spectacle, without breaking any laws, and guilty only of trying to provide for and protect her daughter and granddaughter, Grandma has:

- Been forbidden by the judge to have any visitation with my granddaughter
- Served a sixty (60) day sentence in the parish prison after being falsely accused, unjustly prosecuted, and convicted for criminal contempt of court (the sanction cannot be purged because compliance with the 3/12/19 "oral instruction," was not then, and is not now possible);
- Been ordered unconditionally to pay respondent LNP, \$3,793.55; and

Grandma is still facing a pending cost review hearing upon remand.

Here's an excerpt of the March 12, 2019 hearing: (R.V.2 pgs. 249 – 251)

1 NOT SHE AGREES THAT HE IS THE BIOLOGICAL --
2 NATURAL AND BIOLOGICAL FATHER OF THE CHILD, ROWAN
3 ESTHER PARKER. AND IF NOT, THAT SHE BE CAST UH, -
4 - THAT SHE PAY ALL THE DNA FEES TO HAVE A DNA
5 TEST, IS THAT CORRECT?

6 MR. FITZGERALD:

7 THAT'S CORRECT, YOUR HONOR. SINCE - SINCE
8 UH, SHE UH, - UH, PARTICIPATED IN A PUBLIC
9 DOCUMENT ALLEGING THAT HE'S THE FATHER. ALSO, IN
10 HER PLEADINGS --

11 THE COURT:

12 OKAY.

13 MR. FITZGERALD:

14 -- IF YOU NOTICE, --

15 THE COURT:

16 SO, MS. FINCH, HERE'S - HERE'S THE DEAL. DO
17 YOU - DO YOU STIPULATE TO IT OR NOT?

18 MS. FINCH:

19 WHAT DOES THAT MEAN, YOUR HONOR? STIPULATE?
20 AGREE TO HIS STIPULATION?

21 THE COURT:

22 NO. DO YOU AGREE THAT HE IS THE FATHER OR
23 NOT? YOU'VE GOT -- IT'S NOW -- YOU NEED TO DECIDE
24 WHETHER OR NOT HE'S THE FATHER OR NOT. IF HE'S
25 NOT, THEN, I'M GOING TO CAST YOU WITH ALL THE -
26 THE DNA AND THE PATERNITY TESTING. YOU'RE GOING
27 TO HAVE TO PAY THAT UPFRONT.

28 MS. FINCH:

29 IF HE'S NOT THE FATHER?

30 THE COURT:

31 IF - IF YOU DON'T AGREE THAT HE IS THE
32 FATHER.

249

1 MS. FINCH:
2 I DON'T KNOW, THERE'S A POSSIBILITY, BUT I
3 MEAN --
4 THE COURT:
5 ALL RIGHT, THEN YOU --
6 MS. FINCH:
7 -- WE SIGNED --
8 THE COURT:
9 -- THEN, I'M GOING TO ORDER THAT YOU PAY ALL
10 THE COURT COSTS TODAY TO DO A DNA TESTING. UM,
11 SO, --
12 MR. FITZGERALD:
13 YOUR HONOR, I DON'T KNOW IF THE COURT HAS A
14 PREFERENCE.
15 THE COURT:
16 SO, - SO, IS THIS NOT A FORMAL ACKNOWLEDGMENT
17 BY SIGNING THE BIRTH CERTIFICATE?
18 MR. FITZGERALD:
19 IT IS, YOUR HONOR, BUT IT'S NOT A JUDICIAL
20 DETERMINATION OF THE PARENT. IT'S A FORMAL
21 ACKNOWLEDGMENT THAT THERE IS A PRESUMPTION, IT
22 CREATES THE PRESUMPTION, BUT PRESUMPTIONS CAN BE
23 REBUTTED. WE WANT TO GET BEYOND THE REBUTTAL
24 STAGE AND WE WANT TO GO GET A JUDGMENT OF
25 PATERNITY.
26 THE COURT:
27 ALL RIGHT. SO, I WOULD SAY IF YOU PUT ON THE
28 TESTIMONY AND PUT ALL OF THAT ON, I'M GOING TO
29 HAVE A FINDING THAT HE IS UH, - UM, -- THAT THERE
30 IS A FORMAL ACKNOWLEDGMENT, IF YA'LL WANT TO DO
31 THAT. AND THEN, I'M GOING TO GRANT CUSTODY BASED
32 ON WHAT I HEAR IN OPEN COURT TODAY. SO, --

1 MR. FITZGERALD:
2 SHOULD WE GO FORWARD, YOUR HONOR?
3 THE COURT:
4 I'VE GOT TWO OTHER STIPULATIONS I NEED TO
5 LOOK AT. UH, JUST REMEMBER THAT YOU - YOU LOSE
6 YOUR CONTROL OF WHAT GETS TO HAPPEN ONCE YOU START
7 HAVING TESTIMONY. YOU MIGHT NOT NECESSARILY LIKE
8 THOSE RESULTS. AND IT MIGHT NOT BE EVEN CLOSE TO
9 WHAT YOU THOUGHT WERE IN THE REALMS OF
10 POSSIBILITY. SO, YOU NEED TO THINK ABOUT THAT MS.
11 FINCH AND UH, MR. PARKER BEFORE YOU PROCEED.
12 MR. FITZGERALD:
13 SHALL WE ATTEMPT TO UH, - UH, REACH A
14 STIPULATION AND COME BACK, YOUR HONOR?
15 THE COURT:
16 IF YOU WANT TO.
17 MR. FITZGERALD:
18 THANK YOU.
19 THE COURT:
20 I'LL GIVE YOU A COUPLE OF MINUTES, BUT --
21 MS. FINCH:
22 THANK YOU, YOUR HONOR.
23 THE COURT:
24 WE'RE - WE'RE NOT GOING TO STALL OUT THE
25 CLOCK, WE WILL HAVE A HEARING TODAY AND HAVE A
26 DETERMINATION TODAY.
27 MS. FINCH:
28 YES, YOUR HONOR.
29 MR. PARKER:
30 THANK YOU.
31 (THE COURT MOVED ON TO THE NEXT MATTER)
32 MADAM COURT REPORTER:

This case was built upon lies and stands upon lies. Transcript page 249 lines 6 – 10: while Mr. Fitzgerald states that Ms. Finch has “*participated in a public document alleging that he’s the father,*” no such document has ever been produced. Although Louisiana Court of Appeal, First Circuit (La. 1 Cir.) claims that Mr. Fitzgerald produced a certified birth certificate to the court, I was in Court that day, and there was no birth certificate, or any other “public document” offered into evidence that supports LNP’s *Petition to Establish Filiation*.

Also, Ms. Finch has had no “pleadings” other than her testimony, that Mr. Parker was unbeknownst to her married, and that she lived “*in a whole other house*” during the time of conception in 2013. (R.V.2 p. 230, lines 2 – 4) BLF and REP were still living at that address, which is in the Court record, and is where LNP had her served with his initial *Petition to Establish Filiation* in November of 2016. Contrary to the claims in the petition, that was the address she and REP went home to when they left the hospital after the birth in May, 2014.

As far as this welfare dependent mother being court ordered to pay for DNA testing, an expert, or court costs, this is not her action. She had not asked for nor received any child support or anything else from LNP. As a recipient of Title IV-D funds, she is protected by federal law against being made to incur the costs of such testing. That burden should fall on the state, the court or LNP, according to the law.

Page 250, lines 15 – 17 re: formal acknowledgment by signing the birth certificate. Louisiana birth certificates do not have a signature line for parents. Before one can determine which laws apply, it must be ascertained if there is an

acknowledgment, and whether it was voluntary or by authentic act. Furthermore, it is well-settled that an acknowledgement without a biological relationship is void.

On Page 250, lines 18 – 25: Mr. Fitzgerald exposes the conspiracy that has been perpetrated upon BLF, REP and Grandma. A formal acknowledgement only creates a presumption of paternity. He leaves out the fact that the presumption can be invoked in favor of the child only (for purposes of child support.) La. C.C. art. 196 Revision Comments. Their motive: “*We want to get beyond the rebuttal stage and we want to go get a judgment of paternity,*” without having to take a paternity test.

With the ease and reliability of DNA testing in this day and age, why not simply do what the law commands that you must? Answer: it drives up attorney fees, later charged to the opposing party; and the judges’ court reporters are making a mint off the revenue they charge for typing the transcripts spurned by their bosses’ arbitrary and capricious rulings. The party that has been sanctioned is then prevented from litigating any of the real issues in the case until all fines, fees and sanctions are paid off. The delay game has begun and the money train is chugging.

The court reporter/Deputy Clerk/minute clerk in Division D, Karen Allain, also controls the official electronic minutes of court. She can go into the system at will, and edit the minutes without showing when the changes were made and what those changes were. This violates the Louisiana Code of Civil Procedure art. 254 as Grandma noted in an email dated 10/03/2019 to the Clerk of Court requesting to see the court minutes for the January 8, 2019 bench conference during the appearance scheduled by Judge Day in F-215,728 C, upon her award of custody on 12/05/2018.

1 THE COURT:
2 SO, ARE YOU SAYING THAT THAT PETITION FILED
3 BY MS. UH, GORDON --
4 MR. FITZGERALD:
5 WAS DISMISSED ON THAT DAY. IT SHOULD BE - IT
6 SHOULD BE REFLECTED IN MINUTES OF THE COURT.
7 AND THEN, SINCE THERE WAS NOTHING BEFORE THE
8 COURT, IT WAS INCUMBENT UPON ME TO FILE, WHICH I
9 DID, AND HERE WE ARE.
10 THE COURT:
11 SO, THE PETITION BY MS. GORDON AGAINST UH, -
12
13 MR. FITZGERALD:
14 HER DAUGHTER.
15 THE COURT:
16 AGAINST MS. FINCH -- LET'S SEE, WHAT WAS
17 FILED.
18 STAFF ATTORNEY:
19 (INAUDIBLE) THE DOMESTIC VIOLENCE WAS
20 DISMISSED.
21 THE COURT:
22 THOSE WERE BOTH DISMISSED.
23 STAFF ATTORNEY:
24 OH, YEAH, I DON'T SEE --
25 THE COURT:
26 BOY, THE WAY THEY FILE THESE THINGS DON'T
27 MAKE ANY SENSE ANYMORE. THEY'RE ALL OUT OF ORDER.
28 DECEMBER 5, 2018, BY MS. GORDON AGAINST MS.
29 FINCH, WHEN WAS THAT DISMISSED?
30 MR. FITZGERALD:
31 YOUR HONOR, WHEN WE CAME TO COURT, WE
32 APPROACHED THE BENCH AND UH, AT THAT TIME, THERE

1 WAS DISCUSSIONS THROUGH ATTORNEYS AND UH, THE
2 COURT AND UH, YOU HAD SUGGESTED WELL, IF MS.
3 FINCH'S -- I MEAN, MS. GORDON'S UH, PETITION GOES
4 AWAY, THEN, WHAT ARE WE HERE FOR? AND WE HAD TO
5 BE CANDID WITH THE COURT AND SAY NOTHING.
6 SO, THEY DISMISSED THEIR ACTION. WE LEFT,
7 AND I - I FILED AN AMENDED PLEADING UH, TO UH, SET
8 MY ORIGINAL RULE THAT I FILED TWO YEARS AGO, BUT I
9 AMENDED MY - MY PETITION TO ALLEGE CERTAIN
10 INCIDENCES THAT OCCURRED SINCE THAT ORIGINAL
11 FILING TWO YEARS AGO.
12 WHAT WE'RE TRYING TO ACCOMPLISH, YOUR HONOR,
13 YOU KNOW, IT - IT -- I THINK THE TESTIMONY
14 ULTIMATELY WILL SHOW THAT WHEN MS. FINCH AND MR.
15 PARKER GET ALONG, THEY DON'T -- THEY - THEY --
16 THEY'RE ALRIGHT SHARING CUSTODY OF THIS CHILD.
17 HOWEVER, WHEN GRANDMOTHER UH, GETS INVOLVED,
18 BOTH OF THEM UH, (INAUDIBLE) HER AND IF THERE'S
19 SOMETHING GOING WRONG BETWEEN MR. PARKER AND MS.
20 FINCH, THEN, IT'S TWO AGAINST ONE OVER HERE. ALL
21 WE WANT TO DO IS ESTABLISH PATERNITY AND CHILD
22 CUSTODY AND GET MR. PARKER SOME LEGITIMATE
23 VISITATION RIGHTS WITH HIS CHILD. AND --
24 THE COURT:
25 WELL, NOT VISITATION RIGHTS, PHYSICAL CUSTODY
26 --
27 MR. FITZGERALD:
28 PHYSICAL CUSTODY --
29 THE COURT:
30 -- PERIODS.
31 MR. FITZGERALD:
32 -- RIGHTS. THAT'S CORRECT, YOUR HONOR.

1 THE COURT:
2 OKAY. SO, LET ME SEE IF I CAN GET THE
3 MINUTES.
4 MR. FITZGERALD:
5 TO MAKE THINGS EVEN MORE COMPLICATED. TODAY,
6 MS. GORDON FILED AN INTERVENTION SUIT.
7 THE COURT:
8 ALL RIGHT, AND THAT'S NOT CONFUSING, I SEE
9 IT.
10 MR. FITZGERALD:
11 AND SERVED THAT TODAY.
12 THE COURT:
13 WHY - WHY IS THAT CONFUSING OR COMPLICATED?
14 MR. FITZGERALD:
15 BECAUSE THAT IS -- BECAUSE WE WERE HERE ON
16 SOMETHING, WHEN THEY WERE SERVED A MONTH AGO, AND
17 NOBODY DID ANYTHING. MS. FINCH NEVER FILED AN
18 ANSWER. SHE'S NEVER FILED A RESPONSIVE PLEADING.
19 NOW, MS. GORDON IS COMING IN AND FILING FOR AN
20 INTERVENTION. SHE DIDN'T NAME MY CLIENT AS A
21 DEFENDANT. ALTHOUGH, SHE SERVED HIM. AND, SHE
22 UH, DIDN'T SET ANY TYPE OF HEARING OR RULES, SHE
23 JUST FILED SOMETHING.
24 SO, I'M ASSUMING THAT'S AN ORDINARY
25 PROCEEDING, THAT ULTIMATELY, WE'LL HAVE TO FILE AN
26 ANSWER AND DEAL WITH IT.
27 BUT WHAT'S PRESENTLY BEFORE THE COURT, IS THE
28 DETERMINATION OF WHETHER OR NOT MR. PARKER IS THE
29 NATURAL BIOLOGICAL FATHER OF THE CHILD. AND IF
30 UH, HE CAN GET SOME PHYSICAL CUSTODY RIGHTS WITH
31 HIS CHILD, PENDING A TRIAL ON THE MERITS BETWEEN
32 THE PARENTS, IF THE PARENTS CAN'T WORK IT OUT.

1 NOW, IF MS. GORDON CAN COME IN AND CAN SHOW
2 SHE SHOULD GET SOLE CUSTODY, SO BE IT, YOUR HONOR.
3 BUT --

4 THE COURT:

5 MA'AM, MS. GORDON -- I DON'T NEED YOU SHAKING
6 YOUR HEAD AT THIS POINT. YOU JUST NEED TO --
7 POKER FACE. IF YOU CONTINUE TO SHAKE YOUR HEAD,
8 I'M GOING TO REMOVE YOU FROM THE COURTROOM.

9 NOVEMBER 29, 2016, LET'S SEE, PAST AND
10 REASSIGNED TO DECEMBER -- YEAH, THE MINUTES
11 REFLECT ON JANUARY 8TH, THE MATTER WAS SET FOR
12 RULE, PAULA GORDON, THROUGH HER ATTORNEY OF
13 RECORD, RUFUS CRAIG, DISMISSED HER REQUEST IN SUIT
14 NUMBER 215728. PASSED WITHOUT DATE. AND I SAID
15 AT THAT TIME, WHAT THAT HAS THE EFFECT OF DOING
16 UNDER CODE OF CIVIL PROCEDURE 3945, IS UH, EX-
17 PARTE ORDER OF TEMPORARY CUSTODY, WHICH WAS
18 GRANTED DECEMBER, RIGHT?

19 MR. FITZGERALD:

20 THAT'S CORRECT.

21 THE COURT:

22 AND IT WAS SET FOR JANUARY 8TH, UH, LET'S
23 SEE, --

24 MR. FITZGERALD:

25 IT SHOULD HAVE BEEN DISSOLVED.

26 THE COURT:

27 YEAH, JUST LET ME -- IF YOU COULD JUST GIVE
28 ME A MINUTE, MR. FITZGERALD.

29 MR. FITZGERALD:

30 OKAY.

31 THE COURT:

32 YOU CONTINUE TO JUST KEEP ON TALKING AND IF

1 SOMEBODY WANTS A TRANSCRIPT, --
2 MR. FITZGERALD:
3 PARDON ME, YOUR HONOR.
4 THE COURT:
5 -- IT'S JUST GOING TO CONTINUE TO BE MORE
6 EXPENSIVE, BECAUSE YOU JUST CONTINUE TO SAY THINGS
7 AND I'M JUST SITTING HERE REVIEWING THE CASE.
8 UH, -- YEAH, SO, THEY DISMISSED IT, IT WAS
9 VOLUNTARY DISMISSAL. UM, OR EVEN INVOLUNTARY --
10 THEY DIDN'T PROCEED, SO, IT'S DISMISSED AT THAT
11 POINT. UH, SO, THERE IS NO CUSTODY AWARDED
12 PURSUANT TO THIS ORDER OF TEMPORARY EX-PARTE
13 CUSTODY ON BEHALF OF PAULA GORDON.
14 MR. FITZGERALD:
15 THAT'S CORRECT.
16 THE COURT:
17 SO, THAT'S NOW -- THAT ORDER IS DISSOLVED BY
18 OPERATION OF LAW. UM, SO, NOW WE'RE HERE ON UM,
19 THE PLEADING THAT YOU HAVE?
20 MR. FITZGERALD:
21 THAT'S CORRECT, YOUR HONOR.
22 THE COURT:
23 OKAY. WHICH SAYS, PETITION TO JUDICIALLY
24 ESTABLISH FILIATION WITH THE MINOR CHILD, AND
25 MOTION TO ESTABLISH CHILD CUSTODY.
26 MR. FITZGERALD:
27 THAT'S CORRECT, YOUR HONOR. AND WE FILED AN
28 AMENDMENT TO THAT UH, PLEADING UH, ON FEBRUARY 4TH
29 AND SET THE HEARING FOR TODAY, YOUR HONOR. THAT'S
30 WHERE WE ARE.
31 THE COURT:
32 YOU FILED THE AMENDED, AND IT SAID THAT --

(R.V.2 pgs. 243 – 247) The preceding five transcript pages show exactly where the Court and Mr. Fitzgerald begin verbalizing their fraud upon the court, by repeatedly stating into the record, orally and later through pleadings, the absurd and barefaced lie that Grandma voluntarily “um, or even involuntary ...” ... “it’s dismissed...” or her custody of REP “dissolved...” (Page 247, lines 4 – 19) Grandma avers that if we could get into the electronic minute record through the Clerk of Court’s office like La.C.C.P. art. 254 mandates, we would see that the minutes of court, for the 01/08/2019 court appearance in Division D, were initially created right here at this point in time on 03/12/2019.

Pages 243 @ line 25 – page 244 is where the conspiracy is really laid bare. The judge asks Mr. Fitzgerald about the 12/05/2018 (custody judgment). Fitzgerald proceeds to refresh Greene’s memory about the bench conference that was held on 01/08/2019 when BLF and Grandma appeared in Division D, never going beyond the courtroom gallery. Fitzgerald states in no uncertain terms that it was at Judge Greene’s suggestion that if Grandma’s “...petition goes away, then, what are we here for? And we had to be candid with the Court and say nothing.” Shhhh.

Continuing, he conceits about “when Grandmother uh, gets involved” when things go wrong between LNP and BLF, “...then, it’s two against one over here.” There, he provides LNP’s motive to “get [BLF’s] mom out of the picture.” Grandma got involved because LNP literally, physically and violently drug me into this nightmare. Yet I am the one who gets put in jail and fined almost four thousand dollars and all I’ve ever done is support, love, protect and adore my grandchild.

On page 245 Fitzgerald complains about my filing the *Petition to Intervene*. As the only person ever awarded custody of REP, I had no duty to intervene or appear in Court until served with LNP's petitions for custody. Custody does not expire like some coupon. Moreover, the burden is placed on those already parties to the litigation to join parties needed for just adjudication, not upon the nonparties to intervene in actions to which they are required to be joined pursuant to La. C.C.P. art. 641. *Stephenson v. Nations Credit Financial Services Corp.*, 98-1688 (La.App. 1 Cir. 9/24/99), 754 So.2d 1011, 1021.

An adjudication made without making a person described in the article a party to the litigation is an absolute nullity. *Terrebonne Parish Sch. Bd. v. Bass Enterprises Prod. Co.*, 02-2119 (La.App. 1 Cir. 8/8/03), 852 So.2d 541, writs denied, 03-2786 (La. 1/9/04), 862 So.2d 984, 03-2873 (La. 1/9/04), 862 So.2d 985. The Court, by its own action or lack thereof, deprived itself of subject matter jurisdiction, and deprived REP and me due process and equal protection of the law, by refusing to provide a meaningful opportunity to hear and consider the dire circumstances of REP's life.

Under the premise of keeping children born to unwed mothers off the states' welfare rolls, DCFS established voluntary hospital-based programs that allow men to sign an authentic act of acknowledgement attesting to the belief that a child is his biological offspring, and his name is placed on the birth certificate. In this state, there is no follow-up and DCFS does nothing to keep children off welfare rolls. My daughter and granddaughter have been on welfare since conception in 2013. DCFS-

CSE requires the mothers to instigate a suit through family court, and the mother must maintain the legal pressure if they need enforcement or collection of support.

DCFS' unsafe policies for establishing paternity and child support during these times when human trafficking is exploding, and their procedures (or customs) that saddle unwed mothers with the entire burden of securing child support, along with Family Court's collaboration and blind-eyes for the law, are providing a vehicle and the motive for traffickers to abuse the law and legal process, perpetrate fraud, and to coerce, obtain, and harbor untold numbers of victims for the purpose of subjecting them to labor and sex trafficking, involuntary servitude, peonage, and debt bondage. The police will not get involved here because, "Judge Greene says LNP is the father." Judge Greene told a police officer, "Tell her piss me off and I'll destroy her world, her world being that 4-year old little girl!" REP is almost 8 now.

Grandma naively believed that the judge and DCFS would be bound by the laws of our state and their statute-mandated job duty of protecting the best interest of the children over the adults who seek those services. Instead, she encountered a family court judge that ignored the violence, ignored all verified allegations of neglect and abuse, ignored the custody decree and ignored the law. This judge refused to allow Grandma to defend the false statements uttered against her. He denied her a meaningful opportunity to stand up for REP's rights and interests. He did not review the court-coerced stipulated contract void *ab initio*, because it is *contra bonos mores*, for violating long-standing public policy and the public interest of providing for children by awarding the proper amount of support.

On June 6, 2020, six years after REP was born, and nearly four since LNP commenced this suit in 2016, child support was finally established by the second Stipulated Judgment in this case, after (DCFS-CSE) together with opposing counsel agreed to compromise REP's rights to child support; set at 50% lower than state-mandated guidelines, waiving all retroactive child support and allowing REP to remain on Medicaid and SNAP indefinitely; all while ignoring state child support statutes that mandate reasons are to be given when downward deviations from the guidelines are adopted. Grandma has serious doubts this contract will ever be enforced and REP and BLF will remain in poverty, abused and trafficked.

The offending judgment giving rise to this Court's jurisdiction culminates with Louisiana Court of Appeal, First Circuit (La. 1 Cir.) wrongly classifying and affirming a family court judgment against *pro se* Grandma for contempt of court as a "civil" rather than criminal contempt. This is a matter of federal law and is essential in determining whether constitutionally protected federal rights were upheld or violated. This controlling rule was handed down almost fifty years ago:

"Under the rule we announce today, every judge will know when the trial of a misdemeanor starts that no imprisonment may be imposed, even though local law permits it, unless the accused is represented by counsel. He will have a measure of the seriousness and gravity of the offense and therefore know when to name a lawyer to represent the accused before the trial starts."

Argersinger v. Hamlin, 407 U.S. 25, 40, 92 S.Ct. 2066, 32 L.Ed.2d 530 (1972).

The record of this case, if accepted for review, will show that the court by its own actions or lack thereof, acted *ultra vires* in abuse of the law and legal process, and with malice and intent manipulated the proceedings in order to obtain a

criminal conviction against Grandma, thwart her access to the court, and cause her petition for protection of her granddaughter to go unheard, still to this day. Respondent, LNP, gained an unjust, and unlawful legal advantage, and unjust enrichment by fraud against the government through a conspiracy with the court. This judge never ordered child support and did not review the illegal contract which does not contain the essential elements required for valid contracts in Louisiana.

LNP, his attorney, Judge Greene and his court reporter/minute clerk and Deputy Clerk of Court, Karen Allain, retaliated against Grandma who had custody of R.E.P. by denying access to the bench, changed custody without a hearing, presided over the prosecution for contempt by opposing counsel on 7/30/2019, judged Grandma guilty, and denied Grandma and REP both substantive and procedural Due Process and Equal Protection of Law (by refusing to apply the law.)

Two judges in The Family Court in and for the Parish of East Baton Rouge (Divisions A and D), along with lawyers like Dennis Fitzgerald whom they favor, are refining a modus operandi of finding reasons to impose large fines and/or other sanctions against one party in order to delay the trial of primary issues like parental fitness, establishing paternity, applying child support guidelines, scheduling custody, appointing a domiciliary parent, or examining stipulated contracts of the parties to determine if the children's best interests have been adequately addressed therein. They shield their judgments from review by higher courts with language like "temporarily and in the interim" and writing judgments

that will be dismissed by La. 1 Cir.; in this case initially at Grandma's costs. See Appendix A pages 13 – 16; 05/04/2019 appeal dismissed.

La. 1 Cir. declared the 8/27/2019 judgment, authored by opposing counsel, Dennis Fitzgerald, "fatally defective" for want of "proper decretal language" and because it "doesn't dismiss any claims or demands." See Appendix C page 2; 09/23/2020 (CRAIN, J. dissenting.) He seems to imply that dismissing the appeal at Grandma's costs is going to somehow teach judges how to properly adjudicate, and teach opposing counsel how to write "proper judgments," so they can be appealed.

The problem of so many judgments being dismissed at the complaining appellant's costs, when the opposing party and/or the judge wrote the decretal-language deficient judgment, is widely-known, caused quite the stir and had to be explicitly addressed by the Louisiana legislature. Immediately after the legislation became effective in January 2021, La. 1 Cir. defiantly found reasons to dismiss at least one judgment that should have been addressed by the amending Acts.

La. 1 Cir. not only follows Family Court's developing modus operandi of ignoring the issues presented to the court by litigants in petitions, briefs, exceptions, memorandums and other pleadings, La. 1 Cir. refines and reinforces by repetition the blatant false swearing and perjurious contentions put forth by the lower court to justify unsound theories and lawless rulings. For example, the first sentence in Mr. Fitzgerald's Written Reasons for Judgment under the Facts & Procedural History: "[LP] and [BF] were involved in a relationship that resulted in the birth of their daughter on....." (Appendix B page 1.) Under the same heading

in the 06/03/2021 disposition (Appendix A page 2) La. 1 Cir. states: "*Mr. P. was involved in an extra-marital sexual relationship with BLF, of which one child, REP was born...*" Jerry Springer doesn't even make such bald claims of paternity without a DNA test. And no matter how many times, or by whom an "untruth" is stated and restated, it doesn't suddenly become true.

La. 1 Cir. is not alone in these restatements of unsubstantiated claims. Incredulously, there was a surprise development in the U.S. District Court for the Middle District of Louisiana (M.D. of La.). (Appendix D page. 11) The Magistrate Judge's Report and Recommendations (MJ R&R) issued on Saturday, March 12, 2022 (exactly three years to the day of the March Stipulated Contract between respondents, the same one said to be violated by "not a party to the judgment" Grandma) arrived by email and contained curious decisions if reached independently and without collusion behind the scenes. MJ also classified the family court's finding of contempt as a civil sanction. (Appendix D page. 13)

Since the mid-1800s this Court has clearly and consistently defined civil contempt versus criminal contempt in one unwavering judgment after another. It is inconceivable to Grandma that a college-educated and experienced lawyer or veteran judge would not be able to comprehend and apply the one-step instruction for determining how to ascertain if the contempt sanction triggers federal rights protected by the U.S. Constitution – ask whether the sanction can be purged by complying with the prior order allegedly violated. If it cannot be, like in this case, it is plainly and purely punitive and the criminal element controls.

A previous La. 1 Cir. panel breaks it down so clearly in *Rogers v. Dickens*, 06-0898 (La. App 1 Cir. 2/9/2007), 959 So.2d 940, (cited by Grandma's panel):

A contempt proceeding incidental to a civil action is considered to be a civil matter if its purpose is to force compliance with a court order, but is treated as a criminal matter if its purpose is to punish disobedience of a court order. *State in the Interest of R.J.S.*, 493 So.2d 1199, 1202 (La.1986). In other words, an unconditional penalty, one that the party held in contempt cannot affect or end, is criminal in nature. A conditional penalty, which compels the party to comply with the court's order to end the penalty, is a civil one. *Hicks ex rel. Feiock v. Feiock*, 485 U.S. 624, 633, 108 S.Ct. 1423, 1430, 99 L.Ed.2d 721 (1988). If the penalty imposed is criminal in nature, the burden of proof of the elements of contempt must be beyond a reasonable doubt. *Hicks*, 485 U.S. at 632, 108 S.Ct. at 1429-30.

Grandma cannot travel back in time to the weekend of March 15 – 17, 2019; before any judgment was signed and long before one should have been signed in accordance with the Uniform Rules for District Courts Rule 9.5 which requires circulation for five working days and there is a Local Court Rule requiring an additional 15 days after the 5 working days, putting that ruling as not ripe before April 9, 2019.

It is well-settled in Louisiana law that when a thing commanded to be done or given, is done or given, any chance for appellate review becomes moot upon the doing and giving. In the case of *Times Picayune Pub. Corp. v. New Orleans Aviation Bd.*, 99-237 (La.App. 5 Cir. 8/31/99), 742 So.2d 979, writ denied, 99-2838 (La.12/10/99), 751 So.2d 257, the court stated:

The acquiescence that prohibits an appeal, or destroys it when taken, is the acquiescence in a decree commanding something to be done or given. If the thing commanded to be done or given is done or given, there has been acquiescence in the judgment.

In *Lang v. Asten, Inc.*, 05-1119 (La.1/13/06), 918 So.2d 453, 454 (*per curiam*), the supreme court found that third-party insurers were not willfully disobeying a trial court's order to provide their insureds a defense when they failed to comply with the order pending appellate review:

In the instant case, the order that the third-party insurers were accused of "wilfully disobeying" was the subject of a motion for new trial, followed by an immediate appeal. Under the circumstances, the insurers cannot be considered to have disobeyed the order that they provide their insureds a "full and complete defense" without justification, given the fact that the insurers immediately sought review of the order. The filing of a new trial and/or an appeal challenging an order clearly provides justification for the insurers' failure to obey the order. Accordingly, the district court abused its discretion when it found the third-party insurers guilty of constructive contempt of court.

Capital City Press, L.L.C. v. La. State Univ. Sys. Bd. of Supervisors, 13-1803, 1804 (La. App. 1 Cir. 12/30/2014), 168 So.3d 669.

Grandma sought immediate expedited review by filing a Notice of Intent to Seek Writ on March 15, 2019. (Appendix B page. 13) The document following that shows Judge Green's response to Grandma requesting written reasons for judgment. Denied.... because "requesting person was not a party to the judgment. Further, the case was not contested....." In light of the fact that he signed the Order granting the return date for my writ on the same day Fitzgerald rushed the judgment through in order to get a civil warrant, it seems really insincere that the court would claim: (Appendix B pages. 7 - 10)

1. Grandma voluntarily dismissed custody.
2. The case is not contested.
3. LNP is the "natural father of the minor child."

The last statement about father status is a claim now suddenly parroted by M.D. of La. (Appendix D page. 13) Interestingly, MJ also brings up the Petition for Protection Grandma filed on behalf of REP against LNP. This petition was filed in the suit F-215,728 in Judge Day's Division C. (Appendix D page. 15 n. 17) MJ states that it "*appears [Judge Greene] to be the Family Court judge who granted Plaintiff's Petition for Protection from Abuse.*"

Grandma is stumped that anyone could read that petition and come to any conclusion that Judge Greene granted one iota of protection for REP. (Appendix D page. 29 in box D) the last sentence in parenthesis (*only orders checked and initialed apply*). The only applicable checked and initialed orders are: (on page 31) 13. HVG notes "*Custody was awarded to Petitioner on Dec. 5, 2018.*" and 19. HVG *The Defendant is Ordered To show cause... 12/19/2018.* (Appendix D page. 32)

Greene knew LNP had REP and refused to comply with Judge Day's custody Order. Mr. Fitzgerald advised both BLF and LNP not to appear before Judge Day because she would make them take drug screens. They both followed his advice to wait until he got them before Judge Greene. Accordingly, they have had no parental fitness review at all, no drug screens, no paternity test. If someone can explain how any of that is in REP's best interest, I would love to hear it.

Grandma avers that the forgoing actions by the above named courts, including the incorrect classifications of the contempt sanctions are highly suspect and not unintentional but are instead part of the state courts' brazen manipulation and delay of primary proceedings, coordinated in *ex parte* communications between

opposing counsel, the judges and their staff (trial and appellate), in order to masterfully cloak their malfeasance and misfeasance in office, namely: trafficking of children, obstruction of justice, false swearing, abuse of power, injuring public records, and filing false public records for the purpose of securing criminal convictions against adversary petitioners by way of abuses of the legal process, threats, abuse of rights, coercion, and fraud.

Grandma takes issue with the four state actors being dismissed from federal court WITH PREJUDICE before Grandma ever got inside the building, on the grounds that "*Plaintiff has not timely opposed the motions and the motions appear to have merit.*" (Appendix D page. 8) Grandma filed her objection to MJ's R&R by the date she was ordered to: April 30, 2021 and on page four of Document 16 there is an incorporated Plaintiff's Memorandum in Opposition to Defendants' Motions to Dismiss Pursuant to Rule 12(b)(1)(6) addressing every point directed by the MJ in (Appendix D page. 2 Doc. 13.)

This case was dismissed by MJ on March 16, 2021. You can see in the history of the minutes where someone had to go back in and reinstate the suit. Grandma filed this suit because it states in the statutes that the Attorney General will not blindly defend the judges or other state actors before an investigation is done to see if any crimes were committed. If any investigation was done, no one interviewed me and it was precursory at best.

REASONS FOR GRANTING THE PETITION

Human Traffickers are exploiting the supply of vulnerable women and their children provided as products of outdated policies of DCFS, and arbitrary family court judgments. This court of last legal resort has the opportunity to cut off that supply by ruling that DCFS and Family Courts must follow federal and state laws to afford children the protection those laws provide. Louisiana Court of Appeal, 1st Circuit, neglected its Constitutional duty to review the record and rebuffed the instruction(s) from the Supreme Court of Louisiana:

“Granted. In the interest of justice, the case is remanded to the court of appeal, which is directed to convert relator's appeal to an application for supervisory writs and to consider the application on the merits.” (Emphasis mine). *Parker v. Finch*, 20-987 (La. 9/23/2020), 301 So.3d 1156 (Mem).

La.App. 1 Cir.'s 6/3/2021 ruling on remand failed to consider the plain and prejudicial errors of the offending March 18, 2019 Stipulated Judgment on Rule that determined Leslie Nelson Parker “*to be the natural father of the minor child*” without any proof thereof, in contravention of her mother's sworn testimony; and completely disregarded Louisiana Civil Code Article 179 Establishment of filiation

“*Filiation is established by proof of maternity or paternity or by adoption.*”

The March 12, 2019 proposed consent contract, presented and signed only four working days later in violation of both district and local court rules, is a court-coerced contract which is an absolute nullity, *contra bonos mores*, for want of public policy (compromising the child's rights – filiation, child support, and best interest). It is void as issued by Division D of The Family Court. By refusing to recognize the 12/05/2018 Judgment, *Finch v. Gordon*, F-215,728 Division C, which consolidated

the cases and granted custody (i.e. parental authority) of R.E.P. to Grandma – predicated on the harmful and dangerous lifestyle and unstable living conditions of R.E.P.'s mother – along with the Court's failure to correct Respondent's duty to join a party necessary for the just adjudication of the subject matter pursuant to La.C.C.P. art. 641. Division D divested itself of any jurisdiction, both subject matter and personal; and acting *ultra vires* the court deprived REP of her safety and denied her Grandma a meaningful opportunity to be heard on her behalf.

Since the first informal appearance before the Division D judge 1/8/2019 to the present date, the proceedings were conducted not as a truth and fact finding endeavor for the best interest of REP, but as business raking in thousands of dollars in transcript fees for court reporters, and a one-sided contest of skill and procedure between a *pro se* grandmother and a well-connected attorney who has been given unfair access to the courts through *ex parte* communications. Opposing counsel was allowed to author the 8/12/2019 Written Reasons for Judgment. La.App. 1 Cir. regurgitated as verified facts, the perjurious statements and unsound law therein.

There has been no concern for or consideration of the child. The failure of the courts to seek and ascertain the facts and the truth about her life will have life-long consequences for her and for Grandma. The little girl, who is at the heart of this matter, has a right to not be forced into a relationship with an abusive, controlling drug addict and trafficker of drugs and humans, with whom she has no biological connection.

Grandma seeks review by this Honorable Court as a legacy of justice to her granddaughter, daughter, and those similarly situated in the USA who have not been taken seriously by other authorities – the legal system can and does work even for those who cannot afford to hire counsel or to pay for experts.

CONCLUSION

The petition for a writ of certiorari should it be granted will prevent a gross miscarriage of justice.

Respectfully submitted,


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Date: March 17, 2022

Cc:

Solicitor General of the United States, Room 5614, Department of Justice, 950 Pennsylvania Ave., N.W., Washington, D. C. 20530-0001.