

22-6299

No. _____

ORIGINAL

Supreme Court, U.S.
FILED

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OFFICE OF THE CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

Omri Yigal

— PETITIONER

(Your Name)

vs.

Julia Butler

— 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

Omri Yigal

(Your Name)

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(City, State, Zip Code)

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LEGAL QUESTIONS PRESENTED

1. Does the targeting of a specific child, mother, father, and Jewish family and manipulating government authority to harm the well-adjusted child (with arbitrary discrimination and falsified canards) satisfy the standard for a criminal act laid out by this Supreme Court in *Brandenburg v. Ohio*?
2. Did the lower court violate the Fourth and Fourteenth Amendment with false prohibited government speech of demonic possessions that incited imminent lawless action to harm a discrete minority child? Do the arbitrary administrative orders of the lower court interfere with the mother, father, Filipino family, and the minor child's constitutionally-protected right for them to enjoy a relationship with each other?
3. Does the association between convicted offender Julia Butler and Thomas Cole, Andraya Mimms, and the 23-member group of persons associated together for the purpose of engaging in a common course of family abduction and fraud on the United States Courts constitute racketeering as held by this Supreme Court in *United States v. Turkette*?
4. Does the inveigling of a child (under the age of 18-years) from her home in Georgia and creating a scam to force her into the totalitarian control of a convicted person in Ohio through coercion and fraud (over the parents' objections and without their consent) for the purpose of engaging the child in immoral practices, illicit conduct, and training her to hate her mother, father, Filipino family and Jewish religion, violates the Mann Act and 18 USC 1201? Do the unlawful actions run afoul of this Supreme Court precedence, in *Caminette v United States*?
5. In accordance with the Supreme Court's precedence in *Moore v. City of East Cleveland*, where this Court held that a grandmother has a Constitutional right to live with her grandchild, are the arbitrary discriminatory administrative orders of the lower court (that seeks to deprive a child of the nurturing love and neurological attachments of her mother, father, Filipino family, and Jewish religion) constitutional?
6. Do the arbitrary restrictions of the lower court to deprive parents and child of rights under the color of law infringe on protected liberties? Do the arbitrary actions by the lower court offends the sanctity of family established in *Duchesne v. Sugarman* and do these actions violate U.S. criminal code (42 USC 2001dd) for *Cruel, Inhumane, and Degrading Treatment*?
7. Are the liberties that the lower court denied to the parents, child, and Filipino family, fundamental rights? Do the arbitrary rules advance a compelling State interest? If so,

did the State of Georgia demonstrate concrete quantitative metrics, independent judgment, and objective legal standards that shows its compliance with strict scrutiny guidelines and least restrictive alternative means analyses, as required by the Constitution? Do the arbitrary restrictions implement the least restrictive means to accomplish a compelling governmental interest?

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8. Do juvenile courts have *jurisdiction of person* over 60-year-old adults? Can they hold vexatious litigations in United States courts for the purpose of delegitimizing the Constitution of the United States and can juvenile court judges use their public servant position to politic a fraud through U.S. courts, for the purpose of legitimizing a scam?

LIST OF PARTIES

[X] 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:

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* Julia Butler and Thomas Cole – Julia Butler is a coldblooded convicted receiver of stolen property, forger utterer, and grand thief. Until she was recruited as a spy for Thomas Cole to falsify documents under the color of law, kidnap the Plaintiffs' daughter, traffic the child 1,000 miles from her nurturing environment, parents, and Filipino family, and torture RY in the private prison created by the State of Georgia, Julia Butler's crimes consisted of insurance fraud, check forgery, welfare fraud primarily in Cuyahoga County. However, after conspiring with Thomas Cole, Andraya Mimms, and the Chatham County Juvenile Court in Savannah, Georgia, a marriage of convenience was formed between Julia Butler and a group of persons associated together for the common purpose of engaging in a course of racketeering to kidnap RY from her home without the parents' permission, traffic her out of the State of Georgia, and torture our daughter in a private prison created, by the State, in the house of Julia Butler (where domestic violence, sexual molestation, and child abuse are the norm). Unprotected by law enforcement, the kidnapper is allowed to commit all manner of torture to the child under the pretext of fraudulent juridical documents, all signed by Thomas Cole.

With the marriage of the convicted Cuyahoga receiver of stolen property and Thomas Cole—a broker of child-trafficking in Chatham County Juvenile Court, Julia Butler and Thomas Cole have gone from small time crimes in their respective local counties to federal racketeering, child-trafficking, kidnapping, torture, conspiracy to defraud the United States, solicitation to commit crimes of violence, fictitious obligation, falsification of documents under the color of law, laundering of money in aid of racketeering, and offenses against children. In the case of RY, a lifelong lawbreaker and a magistrate of the law have weaponized the courts to ensnare and enslave; and American children, just entering first grade are stalked, kidnapped, trafficked throughout the country, held in public and private prisons of the State with government force, deprived of their parents, and tortured by the government. It is not a futuristic America; for RY it is the reality of her existence over the past five years; and it is the reason why Thomas Cole and Julia Butler should be held accountable for their unlawful conduct of abrogating RY's fundamental rights (guaranteed by the Constitution) to enjoy a relationship with your own mother, father, and Filipino family. It both sobering and sad to see in the jurisdiction of the United States, county judges taking the law into their own hands. In Chatham County Georgia, it is clear there is at least one judge on the bench who does not adjudicate cases based on the spirit, intent, and letter of the law; but rather is willing to mutilate minority children multi-generationally based on whether he likes her parents, or not.

RELATED CASES

Judith Yigal and Omri Yigal v Julia Butler, et. al, S.D. GA. 11TH Cir. 4:21 CV 230 (2022)

In the Matter of the Guardianship of RY N.D. Oh. 6th Cir. 2019GRD24432

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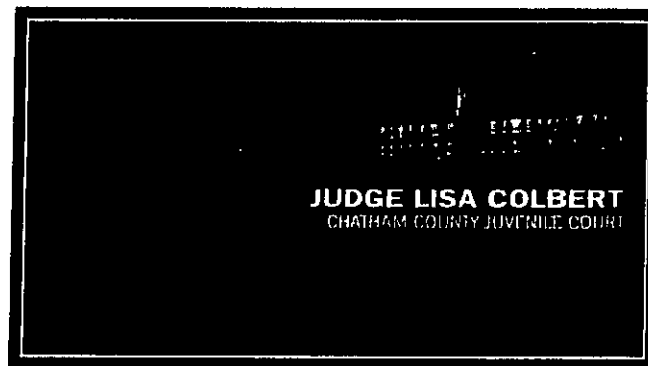
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A Failing Report Card from the Lips of the Judges Themselves

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. Page | 1

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 _____; on,

☐ 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 _____; on,

☐ 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 _____; on,

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

☐ is unpublished.

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

☐ reported at _____; on,

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

☐ is unpublished.

JURISDICTION

☒ For cases from **federal courts**:

The date on which the U.S. Court of Appeals decided my case was March 25, 2022.

CONSTITUTIONAL, STATUTORY, INTERNATIONAL LAW AND
CASE PRECEDENCE INVOLVED

Constitution of the United States of America, First Amendment: Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances. Page | 2

Constitution of the United States of America, Third Amendment: No Soldier shall, in time of peace be quartered in any house, without the consent of the Owner, nor in time of war, but in a manner to be prescribed by law.

Constitution of the United States of America, Amendment IV: The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

Constitution of the United States of America, Amendment VI: In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

Constitution of the United States of America, Amendment VII: In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise reexamined in any Court of the United States, than according to the rules of the common law.

Constitution of the United States of America, Amendment VIII: Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

Constitution of the United States of America, Amendment XIII: Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.

Constitution of the United States of America, Amendment XIV: No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Federal Statutes

18 U.S. Code § 241 - Conspiracy Against Rights: If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the

Constitution or laws of the United States, or because of his having so exercised the same; ...hey shall be fined under this title or imprisoned not more than ten years, or both.

18 U.S. Code § 242 - Deprivation of Rights Under Color of Law: Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both.

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18 U.S. Code § 514 - Fictitious Obligations: Whoever, with the intent to defraud –

- (1) draws, prints, processes, produces, publishes, or otherwise makes, or attempts or causes the same, within the United States;
- (2) passes, utters, presents, offers, brokers, issues, sells, or attempts or causes the same, or with like intent possesses, within the United States; or
- (3) utilizes interstate or foreign commerce, including the use of the mails or wire, radio, or other electronic communication, to transmit, transport, ship, move, transfer, or attempts or causes the same, to, from, or through the United States,

any false or fictitious instrument, document, or other item appearing, representing, purporting, or contriving through scheme or artifice, to be an actual security or other financial instrument issued under the authority of the United States, a foreign government, a State or other political subdivision of the United States, or an organization, shall be guilty of a class B felony.

18 U.S. Code § 1201 – Kidnapping: Whoever unlawfully seizes, confines, inveigles, decoys, kidnaps, abducts, or carries away and holds for ransom or reward or otherwise any person, except in the case of a minor by the parent thereof, when –

the person is willfully transported in interstate or foreign commerce, regardless of whether the person was alive when transported across a State boundary, or the offender travels in interstate or foreign commerce or uses the mail or any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense;...shall be punished by imprisonment for any term of years or for life and, if the death of any person results, shall be punished by death or life imprisonment.

18 U.S. Code § 1519 – Destruction, Alteration, or Falsification of Record: Whoever knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States or any case filed under title 11, or in relation to or contemplation of any such matter or case, shall be fined under this title, imprisoned not more than 20 years, or both.

18 U.S. Code § 1962 - Prohibited Activities: (b) It shall be unlawful for any person through a pattern of racketeering activity or through collection of an unlawful debt to acquire or maintain, directly or indirectly, any interest in or control of any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce.

(c) It shall be unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt. Page | 4

25 U.S. Code § 1914 - Petition to Court of Competent Jurisdiction to Invalidate Action

Any Indian child who is the subject of any action for foster care placement or termination of parental rights under State law, any parent or Indian custodian from whose custody such child was removed, and the Indian child's tribe may petition any court of competent jurisdiction to invalidate such action upon a showing that such action violated any provision of sections 1911, 1912, and 1913 of this title.

42 U.S. Code § 2000dd - Prohibition on Cruel, Inhuman, or Degrading Treatment or Punishment of Persons Under Custody or Control of the United States Government:

No individual in the custody or under the physical control of the United States Government, regardless of nationality or physical location, shall be subject to cruel, inhuman, or degrading treatment or punishment...

(d) **Cruel, Inhuman, or Degrading Treatment or Punishment Defined:** In this section, the term "cruel, inhuman, or degrading treatment or punishment" means the cruel, unusual, and inhumane treatment or punishment prohibited by the Fifth, Eighth, and Fourteenth Amendments to the Constitution of the United States, as defined in the United States Reservations, Declarations and Understandings to the United Nations Convention Against Torture and Other Forms of Cruel, Inhuman or Degrading Treatment or Punishment done at New York, December 10, 1984.

18 U.S. Code § 3283 - Offenses Against Children: No statute of limitations that would otherwise preclude prosecution for an offense involving the sexual or physical abuse, or kidnaping, of a child under the age of 18 years shall preclude such prosecution during the life of the child, or for ten years after the offense, whichever is longer.

42 U.S. Code § 1983 - Civil Action for Deprivation of Rights: Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable.

State Statutes

GA Code § 15-11-135 (2014): (a) *A child taken into custody shall not be placed in foster care prior to the hearing on a petition for dependency unless:*

(1) *Foster care is required to protect the child;*

(2) *The child has no parent, guardian, or legal custodian or other person able to provide supervision and care and return him or her to the court when required; or*

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(3) *An [valid] order for the child's foster care has been made by the court.*

Ohio Revised Code § 2111.06: *A guardian of the person of a minor shall be appointed as to a minor having no father or mother, whose parents are unsuitable persons to have the custody of the minor and to provide for the education of the minor as required by section 3321.01 of the Revised Code, or whose interests, in the opinion of the court, will be promoted by the appointment of a guardian. A guardian of the person shall have the custody and provide for the maintenance of the ward, and if the ward is a minor, the guardian shall also provide for the education of the ward as required by section 3321.01 of the Revised Code.*

Case Precedence

Brandenburg v. Ohio, 395 U.S. 444 (1969): *The Supreme Court held that incitement to violence that creates an immediate risk of harm to a specific roadmap for violence on an identifiable person is a criminal act.*

Caminetti v. United States, 242 U.S. 470 (1917): *The Supreme Court held transporting a girl across state lines for an immoral purpose was well within the plain meaning of the statute.*

Duchesne v. Sugarman, 566 F.2d 817, 825 (2d Cir. 1977): *The Second Circuit held "the right of the family to remain together without the coercive interference of the awesome power of the state...encompasses the reciprocal right of both parent and child. The court explained that children have the constitutional right to avoid dislocation from the emotional attachments that derive from the intimacy of daily association with their parent".*

Griswold v. Connecticut, 381 US 479 (1965): *The Court held unconstitutional a Connecticut law that barred the use of distribution of contraceptives, even for married person. The Court ruled the Constitution protects various kinds of intimate privacy and the marriage relationship fell well within a zone of privacy that protected couples from virtually all governmental regulations.*

Hardwick v. County of Orange, No. 17-56292 (9th Cir 2020): *The Court held "children have a constitutional interest in familial companionship; and juvenile court and Orange County government agencies " violated the [the parents and child' s] Fourteenth Amendment right to familial association and Fourth Amendment right against wrongful seizure by removing her daughters from her home.*

Korematsu v. United States, 323 US 214 (1944): *The Court held that the federal government had the power to arrest and intern Fred Korematsu, under Presidential Executive Order 9066 issued by President Franklin D. Roosevelt, requiring him to submit to forced relocation and*

interment of on the basis of Japanese descent, was constitutional; the decision became infamous not for its accuracy but for its inaccuracy before it was finally overturned in 2018.

Lassiter v. Dep. Of Soc. Service, 452 US 18(1981): The Court held parents have a due process right to a fundamentally fair procedure that may require the appointment of counsel.

Lawrence v. Texas 539 US 558 (2003): Accordingly, the Supreme Court held, "Petitioners are entitled to respect for their private lives. The state cannot demean their existence or control their destiny by making their private...conduct a crime. Their right to liberty under the Due Process Clause gives them the full right to engage in their conduct without interference of the government."

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MD: bnf Stukenberg v. Abbott, 152 F. Supp. 3d 684 (2011): The Court held the State's holding of children was unconstitutional.

Meyers v. Nebraska, 262 U.S. 3990 (1923): The Supreme Court held a statute forbidding the teaching of the German language impermissibly encroached on the liberty parents and the Due Process of the Fourteenth Amendment which protects parents' liberty, "to marry, establish a home, and bring up children"

Moore v. City of East Cleveland, 431 US 494 (1977): The Supreme Court ruled held a zoning ordinance that prohibited a grandmother from living with her grandchild was unconstitutional.

Pierce v. Society of Sisters, 268 U.S.510 (1925): The Court struck down an Oregon statute requiring children to attend public schools. This statute interfered with the right of parents to select private or parochial school for the children and it lacked a reasonable relation to any purpose within the competency of the state.

Santosky v. Kramer, 455 US 745 (1982): The Court declared unconstitutional a New York statue that authorized termination of parental rights based on a preponderance of the evidence. It further held, that even after parents are found unfit in a contested court proceeding, they retain constitutionally protected parental rights.

Skinner v Oklahoma, 316 US 535, 536 (1942): The Court held an Oklahoma law that allowed the state to sterilize person "convicted two or more times for crimes amounting to felonies involving moral turpitude: violate the Equal Protection Clause of the Fourteenth Amendment because it infringed upon the fundamental "right to have offspring"

Stanley v. Illinois, 405 US 645 (1972): The Court declared unconstitutional an Illinois dependency statute that deprived unmarried fathers of the care and custody of their children...without any showing of the father's unfitness.

State of Florida v. Gloria Williams, 4th Cir (2018): The Court held the crime of kidnapping a child from her biological mother and father is "an aberration of character".

State of Georgia v. Sherry Jo Wilkes, (2020): The District Attorney refused to prosecute Sherry Jo Wilkes for sexually abusing children repeatedly supplied to the abuser by the Georgia Department of Family and Children Services.

State of Georgia v. Travis McMichael, CR2000433 (2022): The Court held that "quotes [by the perpetrator] give context to the [crimes he has committed]."

State of Ohio v Ariel Castro, USA Today (2013): The Court held that "acquaintance with the kidnapped victims was a factor in the abduction strategy." "That was your entrée; and [it is] clear, you are able to choose who you want to victimize. In your mind, there was harmony and a happy household. I'm not sure, there's anyone [with a clear mind] who would agree with you".

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Westfield Inc. Co. v. Harris, 134 F.3d 608 (4th Cir. 1998): The Court held, "where prior acts of apparent coincidence are similar, the repeated reoccurrence of such an act takes on increasing relevance to support the proposition that there is an absence of accident [and the outcome is by design]."

Wisconsin v. Yoder, 406 US 205 (1972): The Court held that Wisconsin's compulsory education law violated an Amish father's right to take his 15-year-old children out of school to complete their education in Amish ways at home.

United States v. Ciavarella, 481 F. Supp. 3d 399 (2011): The Court held that Judge Mark Ciavarella and Judge Michael Conahan "failed to protect children who came before their courts" in the Kids for Cash child-trafficking scheme in Luzerne County, Pennsylvania.

United States v. Guest, 383 US 745 (1966): The Court held that conspiracy with the State to deprive a citizen of rights under the color of law is a violation of Section One of the 14th Amendment.

United States v. Turkette, 405 US 645 (1972): The Court held, a racketeering enterprise is "a group of persons associated together for a common purpose of engaging in a course of [unlawful] conduct"

Public Law

Public Law 61-277 - White Slave Act: Be it enacted by the Senate and House of Representatives of the United States of America in Congress assemble that the term "interstate white slave traffic commerce," as used in this Act, shall include...

Sec 4. That any person, who shall knowingly persuade, induce, entice, or coerce any woman or girl under the age of eighteen years from any State...to any other State...with the purpose and intent to induce her, or that she shall be enticed or coerced to engage in prostitution...or any other immoral practice, and shall in furtherance of such purpose knowingly induce or cause her to and to be carried or transported as a passenger in interstate commerce upon...any common carrier... shall be deemed guilty of a felony, and on conviction thereof shall be punished...for a term not exceeding ten years.

Sec 5. That any violation of any of the above sections two, three, and four shall be prosecuted in any court having jurisdiction of crimes within the district in which said violation was committed, or from, through, or into which any such woman or girl may have been carried or transported as a passenger in interstate or foreign commerce...and the word 'person', as used in this Act, shall...include corporations, companies, societies, and associations".

Public Law 108-21, Sec 104(b) - Stronger Penalties Against Kidnapping: (b) minimum mandatory sentencing [for] Section 1201 (g) of Title 18 USC is amended by striking "shall be subject to paragraph (2)" in paragraph (1) and all that follows through paragraph (2) and inserting "shall include imprisonment for not less than 20 years".

United Nation's Convention on the Right of the Child

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Article Seven: *The Child has the right to know and be cared for by her parents*

Article Eight: *State Parties must respect the right of the child to preserve his identity and family relations without unlawful interference.*

Article Nine: *State Parties shall ensure that a child shall not be separated from her parents against her will...State Parties shall respect the right of the child to maintain personal relations and direct contact with both parents on a regular basis.*

Article Sixteen: *Child shall not subject to arbitrary interference into her family, home or attacks on her honor, and the right to protection of the law.*

Article Eighteen: *Both parents have rights and primary responsibilities in bringing up children.*

Article Nineteen: *State shall protect children from mental violence, abuse, neglect, maltreatment and exploitation.*

Article Twenty: *A child deprived of her parents shall be placed in suitable care in keeping with her education, [Jewish] religion, ethnic, cultural, and linguistic background.*

STATEMENT OF THE CASE

This is a case of juridical misconduct in deliberate and willful violation of the United States Constitution. Thomas L. Cole, a county public official in the State of Georgia exceeded State authority against a discrete and insular parents to prevent them from having a relationship with their biological child and protecting her from a totalitarian State. Behind government force, he and convicted Cuyahoga Grand Thief, Julia Butler, together ran a fraudulent scam of child-trafficking under the color of law. In deliberate violation of the *White Slave Traffic Act*, they transported our child from Georgia to Ohio, for the purpose of inducing her into immoral practices. They deprived our child and her Filipino family of legal protections and human rights. This case will illuminate a few of the tactics the government employed to circumvent the law with arbitrary rules, pseudoscientific doctrine, unconstitutional legislation, and fraudulent schemes that exceeded State authority.

Over 70 years ago, this Honorable Court held, in *Brown v. Board of Education of Topeka*, 347 U.S. 483 (1954), the *separate but equal* doctrine was inherently unequal, as it was a deprivation of the Equal Protection Clause of the Fourteenth Amendment. The case before the Court today involve facts similar to those of *Brown v. Board of Education of Topeka*, *Hardwick v. Orange Co.*, and *Caminetti v. United States*. It is a case for certiorari, to show that the unprovoked attacks upon the liberties and fundamental rights of our daughter and Filipino family, violated the substantive due process protections of the Constitution, the *White Slave Traffic Act*, 18 USC Sections 242, 1519, 3283, and a host of violations of United States Code. Page | 9

In *Skinner v. Oklahoma*, this Honorable Supreme Court held, "the power to [control a population] **in evil or reckless hands**...can cause races or types which are inimical to the dominate group to wither and disappear. This Supreme Court held that in such cases, "strict scrutiny" must be applied to government action, "lest unwittingly or otherwise, invidious discriminations are made against groups or types of individuals in violation of the constitutional guaranty of just and equal laws". If the Supreme Court allowed this to be so, then the Court held, "the equal protection clause would be a formula of empty words, if such conspicuously artificial lines could be drawn."

Working as a single continuous unit, Thomas Cole, Julia Butler, the State of Georgia, and a 23-member group of known and unknown persons associated together for a common purpose of engaging in a course of racketeering, soiled the principles of the Constitution of the United States, that undergirds the entire justice systems, by giving birth to a fraudulent scam and then misusing the full faith and credit of the United States government to muscle the fraud through U.S. district and probate courts under the color of law. Aiding and abetting each other, the associates thereof made a mockery of the rule of law and turned a blind eye to the abundance of case law that has come out of this Court, as legal precedence, for the lower courts to follow. In their prowess, the tyrannical State not only violated substantive due process protections and fundamental rights

guaranteed by the Constitution; but they reinstated prohibited institutions of indentured servitude and modern child slavery.

Through a fraudulent scheme of conspiracy, deception and fraud, the racketeering enterprise garnered the favor of sitting judges, to funnel their scam through U.S. courts as a legitimate legal petition, when in fact, their falsification of documents under the color of law [18 USC 1519], served no compelling interest, beyond depriving a discrete and insular minority family in general, and RY in particular, of protected liberties, fundamental rights, and equal protection, under the law. In *State of Ohio v. Ariel Castro*, the Court held, "acquaintance with the kidnapped victims was a factor in the abduction strategy. That was your entrée; and [it is] clear, you are able to choose who you want to victimize." These identical tools of deception were the unlawful acts in both *Ohio v Castro* and in the abduction, trafficking, and torture of our daughter.

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To establish the totalitarian State, the State of Georgia launched its campaign of war upon the Filipino family on Erev Shabbat at RY's elementary school, when she was just five years-old. After picking up our first grader, before heading off to Frozen Yogurt as was the custom every Friday, the State agency, stalked, harassed, and intimidated the terrified family, with prohibited government speech designed to incite imminent lawless action. With malicious intent, the government proffered incendiary false statements to Savannah Police officers to attack, dismantle, and exterminate our familial association. When the incitement to lawless action was rejected by law enforcement, the State marshalled its control over Thomas Cole and recruited him into the racketeering scam, despite the fact juvenile court had no jurisdictional authority over the parents nor the child. He needed, however, a tool to physically attack RY, for although he was a powerful judge, he could not do the job himself. He therefore, conspired with the Cuyahoga Receiver of Stolen Property, Julia Butler, to whom he would inveigle as property; and she would then deprive our daughter of her parents and Filipino family, without mercy, for money.

Using the cruelty of state incarceration as coercion, Thomas Cole threaten to torture our daughter indefinitely in brutal government internment camp, if the Cuyahoga Receiver of Stolen Property was not allowed in the family's home; and once inside the home, the child abductor was order by the State and Andraya Mimms in particular, to "take the child and run; and don't feel bad about it". Wendy Furey decommissioned the police by selling the false statements that the convicted Cuyahoga criminal had proper legitimate authority to transfer our daughter out of the State and away from her nurturing environment, Jewish playmates, Montessori school, parents, land, reservation, and Filipino family. But the truth was just the opposite; and the racketeering enterprise was making their getaway exit from the criminal scene of abducting a child from her home under the color of law and trafficking her into online exploitation and modern child slavery. In *Caminetti v. United States* this Court held, "There is no ambiguity in the terms [in the *White Slave Traffic*] Act. It is specifically made an offense to knowingly transport or cause to be transported, etc., in interstate commerce, any woman or girl...with the intent and purpose to induce any such woman or girl to...engage in any [injurious purpose or] immoral practice [for pecuniary gain].

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The association with Julia Butler did not involve judicial duties of the court, as they were not carried out in the execution of his judicial responsibilities. Rather the association with Julia Butler where administrative in nature because the State may not enforce laws that are in conflict with the Constitution; and any administrative action is not shielded by judicial immunity. Thomas Cole's actions, in fact, were executed without probable cause, without exigent circumstances, without procedural due process, without notice, without warning, without any standard of proof, without provocation, without jurisdiction of subject matter, and without jurisdiction of person, and with malice.

He used state incarceration, a system U.S. courts have held as institutions of "rape, abuse, psychotropic medication, and instability" as a torture chamber to traumatize RY and to torture her parents. He conspired with a criminal to steal RY from her home. In a vexatious attack upon our discrete and insular family and where no delinquency,

probable cause, nor exigent circumstances existed, Thomas Cole forced our daughter into a prison of peonage without respect for fathers and a family of crime, that he created himself, wherein our daughter would be enticed or coerced to engage in...immoral practices, and in furtherance of such purposes, he knowingly violated *Public Law 61-277* Page | 12 - *White Slave Traffic Act*. In violating his oath of office as well as State and Federal laws, he willfully and deliberately sabotaged RY parents' right to raise their child, obstructed the parents' right to make decisions on behalf of the welfare of their child, and conspired with persons associated together to cause irreparable injury or put to death RY's father, in order to silence the parents' and Filipino families' resistance, to the hostile government takeover of their child and the unbridled adversarial aggression of the State.

Five days after the kidnapping, Thomas Cole falsified documents to give judicial cover to kidnapping, child-trafficking, racketeering, money laundering, and fraud. Using the government as a shield for committing fraudulent actions, Thomas Cole and Julia Butler operated above the law. They openly violated the Constitution, as a matter of bravado and self-anointed State-government totalitarianism. Their conduct was consistent with people who neither hide their wrongdoings nor temper their assault on others with mercy, compassion nor empathy. Not once did they curtail their offenses against our daughter, as they could not see the five-year-old as a child. Guidelines, coming out of this Court in *Gertz v Robert Welch, Inc.*, and *Brandenburg v. Ohio*, were completely ignored. Objective standards of Federal Rules of Evidence, doctrine of chances [*Westfield Ins. Co. v. Harris*], strict scrutiny, alternative means, and compelling State interest were set aside, as the racketeering crew abused our child at will.

The group then attacked the parents' military disability benefits and medical records with fictitious disorders imposed on another. They attacked the paternity of our child, the mental health of both parents, the custody of the parents and RY's access to her mother, father, and Filipino family. They filed a fraudulent guardianship application that reeks of conspiracy, racketeering, money laundering, immoral practices, falsification of documents under color of law [18 USC 1519], deprivation of rights under color, and

attempted medical homicide. The State of Georgia used its influence (as a government agency) to proffer fraudulent probate affidavits, and to convinced a corrupt V.A. Healthcare System to kidnap and unlawfully detain RY's father. Implementing the pseudoscience of Samuel Cartwright i.e. labeling African Americans with mental illnesses, for running away from slavery, the associates of the racketeering group [*United States v. Turkette*] stalked, harassed, and attempted to cause the death of the father with lethal drug induction during a sixty-day kidnapping of the parent, when he traveled to Ohio, to celebrate his daughter's birthday with her. Page | 13

In *United States v Turkette*, this Supreme Court held, an associate-in-fact enterprise is, "a group of persons associated together for a common purpose of engaging in a common course of [unlawful] conduct," and according to this standard set by this Honorable Court, the fraudulent scam of Thomas Cole and Julia Butler was given undue credibility because most were government employees. The State, therefore, used that influence to recruit Archana Brojmohun, a doctor in the Cleveland veterans' clinic, into the racketeering scam. Working as one continuous unit, the expanded racketeering group, staged an impromptu Cuyahoga Probate hearing to rubber stamp a foregone decision of "*chronic schizophrenia*" and medical homicide, without impartial scientific data. This kidnapping and unlawful detainment of RY's father, at the veteran's clinic, completely violated universally established standards of medicine established by the Nuremberg Codes directives on human experimentations.

Public records were altered. Medical files were cooked. Court documents were doctored; and the State authorized a high school dropout, child abductor, and convicted receiver of stolen property, in Julia Butler, to diagnose RY's mother and father with mental disorders, in violation of 18 USC 1519. Every day, this totalitarian State targets children inimical to the dominate group, traffic them throughout the country and abroad, hold them in prisons of the State's creation, subject them to inhuman treatment and torture, harbor them in forced internment camps of indentured servitude, maintain hostile occupation over their life, as well as institutional oppression and deprive them

(and their parents) of constitutionally protected liberties. In *Hardwick v Orange County*, the Court held, the interest of parents in the care, custody, and control of their child - is the oldest of the fundamental liberties recognized by the Supreme Court of the United States. The "constitutional interest", it held, "in familial companionship and society Page | 14 logically extends to protect children from unwarranted State interference with their relationship with their parents."

In *Duchesne v. Sugarman*, the Court held, "children have the constitutional right to avoid dislocation, from the emotional attachments that derive from the intimacy of daily association with their parent". But the State of Georgia has unlawfully interfered with the biological parents' Fourteenth Amendment right of familial association with their daughter and our daughter's Fourth Amendment right to be free from unreasonable seizure as in *Hardwick v Orange Co.*; and it is that willful, deliberate, and malicious violations of those Amendments that is the heart of this case, before the Supreme Court today.

In *Pierce v Society of Sisters*, 268 US 510 (1925) this Honorable Court held, "**Children are not mere creatures of the State**"; and in *Moore v City of East Cleveland* US 494 (1977) The Court held, that States infringement upon the sanctity of family society impose "intrusive regulations on the family". While the Fourteenth Amendment holds that all States, within the jurisdiction of the United States, are legally bound to respect the Constitutional rights of parents to raise their children, the State of Georgia engineered a fraudulent scheme to avert the rule of law; and through vexatious litigation (in a juvenile court without jurisdiction) the racketeering enterprise deprived our families of fundamental rights guaranteed by the Constitution [*US v. Ciavarella* and *MD: v Abbott*].

Speech that incites imminent lawless action in general and speech integral to illegal conduct, in particular, were the initial weapons of war, for the State, against our discrete and insular minority family. Every targeted false statement and malicious utterance of fictitious obligations were launched with precision, to interfere with our parental rights and precisely targeted to prevent RY from enjoying a relationship with her parents and Filipino family. In *Lawrence v. Texas*, this Supreme Court established the

precedence that parents have a fundamental right to their private lives without interference from the State. In a 6-3 vote, the Court held, "[parents] are entitled to respect for their private lives. The State cannot demean their existence or control their destiny by making their private...[lifestyle] a crime. Their right to liberty under the Due Process Clause gives them the full right to [raise] their [children] without interference [from] the government." Page | 15

In the case of the *State of Georgia v Travis McMichael*, (2022) the Court held, "quotes [by perpetrators] give context to the [crimes they have committed.]" We believe, when this Honorable Supreme Court looks at the language exclusively employed by the State of Georgia (to deprive a baby of the bosom of her mother) quotes by associates of the racketeering enterprise will give context to violations of the Fourth and Fourteenth Amendments, that has given rise to this cause of action. Aiding and abetting each other, the associates in the racketeering enterprise communicated nothing but enmity for RY's mother, father, RY, and her Filipino family. Prohibited incendiary government speech and flimsy excuses such as "*peculiar parenting style*", "*erratic behavior*", "*the court also takes judicial notice of the apparent mental health issues...as evidenced by the father's appearance*", and "*you have no rights*", reveals a clear path of how our daughter was unlawfully removed from her nurturing environment and trafficked across State lines, with government force, into a private prison and a *family of crime without respect for fathers*, created by the State. In this house of torture and domestic violence, associates of the fraudulent scam induced, enticed and coerced our daughter to engage in immoral practices, in violation of the *White Slave Act*, i.e. *Caminetti v United States*. "We are all accountable, for our own actions", the Court held in *Georgia v McMichael*, "[and] **everybody is accountable to the rule of law.**" In the final remarks from the bench, the Court stated, "Taking the law into your own hands is a dangerous endeavor. Ahmaud Arbery's death should force [all of us] to consider expanding our definition of what a neighbor may be and how we treat them. [For] by assuming the worst in others, we show **our worst character.**"

In the light of truth, the State's power is limited to the adjudication of law, subject to the United States Code and the Constitution of the United States, irrespective of race,

religion, and national origin. Individually and collectively, these laws are intended to protect every person in the United States equally. In *Meyers v Nebraska*, 262 U.S. 390 (1923) the Supreme Court held, "liberty...without a doubt...denotes...the right of individuals...to bring up children [and] worship God according to the dictates of his conscious. The right of the parents...to instruct their children, we think, are within the liberty of the [Fourteenth] Amendment. Evidently, the Legislature has attempted materially to interfere with...the power of parents to control the education of their own [children]. The individual has certain fundamental rights that must be respected; [and] the protection of the Constitution...cannot be coerced by methods which conflict with the Constitution, [i.e.] a **desirable end cannot be promoted by prohibited means.**" Page | 16

Prior to kidnapping our child, Julia Butler was a mere Cuyahoga receiver of stolen property (if it is possible to be a "mere" violator of the law). However, when the State of Georgia recruited her as an espionage agent for the State, it transformed the Cuyahoga R.S.P. into a felonious offender of the laws of the United States, with the coldblooded callousness to commit criminal offenses against a child and attempted murder of her own brother. Aiding and abetting each other, the State and the lawbreaker knowingly altered, destroyed, mutilated, concealed, covered up, falsified, and made false entries in the military medical records of RY's father. Though she never served one day in the military, the check forger and the State worked hand-in-glove to engage in money laundering, both from the Department of Veteran Affairs and Social Security Administration. The child abductor's fraudulent guardianship application of our daughter was cosponsored by "Andraya Mimms" and the State, in blatant violation of 18 USC 1519; and false paternity testing was ordered to defraud the Department of Ohio Job and Family Services.

Court files were also altered, doctored, and falsified, to impede, obstruct, and influence administrative hearing and court proceedings to favor Julia Butler and lift her up as an honest person, when the exact opposite was the truth. Behind every court hearing, to free our daughter from the child abuse, torture, Christian programming, Internet advertising, sexual molestation, immoral practices, and injurious purposes, for

pecuniary gain, Andraya Mimms, Thomas Cole, and the racketeering enterprise of the State of Georgia were using the full faith, influence, and credit of the United States government, to obstruct, frustrate, miscarry, and sabotage the rule of law.

Immediately after the kidnapping of our daughter, the parents called Department Page | 17 of Ohio Job and Family Services, to try to get the State of Ohio to protect our daughter from the abuse, terror, and torture that her abductor presented to her life. In an email, the parents wrote, "Ms. Jones, **Remelina is Jewish**; if Julia tries to put [our] daughter in school, then Remelina needs to go to a Jewish school or Montessori school. Also, the child needs to go to synagogue rather than church. This is just one example of so many, why my sister is not capable of making decisions for my daughter". Ms. Jones fired back a blistering repudiation of the parents' right to choose the education of their child: stating, "No, Mr. Yigal, I don't believe it is. Remelina's religion and schooling are separate. While a Jewish or Montessori school would be preferred, however a regular public school would not affect her being Jewish. The suggestion for these schools can be made to Julia and the possibility explored".

After savagely abducting our daughter from her home and all that she had come to know, love, trust, and believe, Thomas Cole, Julia Butler, and the group of persons associated together for the common purpose of racketeering and depriving our daughter and her parents of Constitutional Liberties under the color of law, there was no resistive force from law enforcement to repel the fraud on U.S. Courts; and religious and national origin prejudices of the racketeers was free to block the parents from exercising the Thirteenth Amendment right for their child to be free from indentured servitude [see *United States v Kozminsky*, 487 US 931(1988)].

In *Wisconsin v Yoder*, 406 U.S. 205 the Supreme Court held, (with modest revision) "State[s] cannot force individuals to attend school when it infringes on their First Amendment right; [as this oppressive action] interfere[s] with the practice of a legitimate religious belief...[and compulsory public education] is in sharp conflict with the [parents] way of life. The [Jewish] community [is] a very successful social unit in American society, a self-sufficient law-abiding member of society, which paid all the required taxes and

rejected any type of public welfare. [Jewish] children upon leaving [Jewish academies and yeshivot] continue their education in the form of [public universities and professional education.]" In *Clyatt v United States*, 197 U.S. 207 (1905) this Court held that indentured servitude is conferring "a status and condition of compulsory service based upon an indebtedness of the peon to the master" [and/or a State perceived failure to comply with arbitrary rules]. Page | 18

In *Gloria B. Williams's v State of Florida*, the Court found, Gloria Williams' sentencing of eighteen years for kidnapping a baby from her mother and for interfering with parental custody was lawful "*in light of mitigating factors*" and on the basis that her unlawful conduct, "constituted cruel and unusual punishment." But despite this and similar case precedence, the neurological needs and best interest of our daughter, i.e. her sense of attachments, continuity of affection, least disruptive environment, physical safety and welfare, mental health of those involved in the life of the child, playmates and friends, religious community, need for permanence, stability, and continuity of relationship with her parents and Filipino family...all these neurological bonds of our daughter, were summarily disregarded by the State, on the perceived notion of a compelling state interest to transmit the illicit social values of a convicted Cuyahoga lawbreaker, over the nurturing love and affection of RY's law-abiding natural parents.

The State rolled out a series of completely arbitrary *separate but equal* falsified statements to demolish RY's family and violently disintegrate everything RY had come to know and believe. The State drew heavily and almost exclusively on its racial discriminatory history of treating discrete and insular minority fathers as incapable of loving and caring for their children as white fathers in general and white Jewish fathers, in particular. Her Manobo mother's national origin was used as an excuse to afford her mom no standing and no voice in the juridical assault upon her child; and her pain, agony, yearnings, and woes were ignored – a national origin discrimination popularized, in the United States, at the Louisiana Purchase Exposition human zoos, where the State of Missouri showcased indigenous Igorot tribes of the Philippines eating dogs, as a means of conveying the *master race theory* of European racial superiority.

RY was smeared with the racial label, "Black" and summarily treated as such, in accordance with the racial injustices of American life, for all persons of African descent. But, RY, her parents, and her Filipino families are distinct and insular minorities, of Filipino and Cherokee national origins. Accordingly, RY's race and ethnicity is Filipino- Cherokee. Her mother is Manobo - a tribe of indigenous ancestry in the Republic of the Philippines, which traces its ancestry to the origin of the Philippines. RY's birth is registered with the Philippines Statistic Authority; and her race is recorded as Filipino. RY's father national origin is Cherokee, as a result of his lineage to the Indigenous Cherokee Indian tribes of the State of Alabama; and he is a son of Abraham, Sara and the Jewish People. He was passing on his Jewish values, customs, religion, and ways of life, to his daughter, when she was unreasonably seized, molested, prodded, herded, and dislocated from her life and nurturing environment by the State. Page | 19

RY was ripped from her Jewish playmates and her Hebrew school enrollment, with a government savagery, that shocks the conscious. She was afforded no State protection, in violation of her Fourth Amendment Right to be free of dislocation from familial association and to be protected from a totalitarian State and unreasonable seizure. The family's reservation was also the home and land subject to restriction against alienation, whereupon the State attacked, invaded, raided and unlawfully seized our daughter, in violation of 25 USC 1919 and standing treaties and agreement between the United States and Indian tribes. The abusive, cruel, inhuman, and oppressive treatment of RY, by the government, was particularly cruel and hideous, because the invidious discrimination targeted and assaulted the biological, psychological, religious, and neurological bonds of our child to her parents, and the equally deep attachments of the parents to their child.

Neither the Thomas Cole rules nor the State's arbitrary restrictions pass strict scrutiny examinations; and they run afoul of the laws of the Constitution and the United States. They are Anti-Semitic, Anti-Manobo, Anti-Cherokee, Anti-Filipino, Anti-family, Anti-child, Anti-American, and Anti-Constitutional. The use of a convicted lawbreaker to invade the family's zone of privacy was conspiratorial; and it runs afoul of *United States*

v Guests, and is a violation of 18 USC 241, 242, 42 USC 1983, and the *White Slave Traffic Act*. It was the Honorable Supreme Court that held, "conspiracy with the State to deprive a citizen of rights under the color of law is a violation of *Section One of the Fourteenth Amendment*. Though the convicted receiver of stolen property is not a doctor, the State of Georgia authorized the convicted lawbreaker to diagnose drapetomania upon both mother and father and falsify hospital, government, and court records, in violation of 18 USC 1519, to effectuate their fraudulent scam. Despite the convicted Cuyahoga grand thief's fifty-plus-year life-pattern of unlawful conduct, the child-abductor was given cover, by the State, to advertise pictures of our daughter online, to an audience of online sex predators and Internet stalkers of prepubescent children, in deliberate, bold, and audacious violation of the *Mann Act*. Page | 20

In addition to grooming the Cuyahoga check forger to defraud the Social Security Administration, Cleveland Louis Stokes Veterans Hospital, Department of Veterans Affairs, and Ohio Job and Family Services, the Cuyahoga lawbreaker was coached on filing a fraudulent Application for Guardianship of our daughter, with the Cuyahoga County Probate Court. In breach of the First Amendment of the Constitution prohibition against the establishment of religion or prohibiting its free exercise, the lawbreaker and the State tormented our daughter with Christian ideology to repeal her Jewish values, customs, and way of life. In *Gertz v Welch, Inc.*, (1974) this Supreme Court held, there is "no constitutional value in false statements of facts". Notwithstanding, the racketeering group deliberately exercised doubletalk, dirty dealings, and dishonest disinformation, to defraud the parents, decommission law enforcement, and deprive our child of her Manobo and Cherokee heritage, Jewish religion, the language of her mother's tongue, a knowledge of herself, the protection of her parents, and the faith of her father, in perpetuity.

The goal of the racketeering crew was to muscle the fraudulent scam through U.S. courts and government agencies under the color of law. This unconstitutional use of government force is the revival of indentured servitude, peonage, and the new expressway to modern child slavery. It is a deceitful manner of catching, ensnaring, and

entangling our daughter and America's children, as perpetual slaves, under the color of law and in violation of everything the Constitution of the United States and the United States Code stands for. The cruelty, inhumanity, and arbitrariness of enslaving disproportionately minority children is executed with the same callousness, viciousness, and inhumanity as was executed in the original sin of the Transatlantic trade of children, from Africa to the United States. Page | 21

The State argues the colossal dislocation and the abortion of the child from her mother, father, and Manobo family is *separate but equal* placement which exposes her to the government's two-state *prison-pregnancy* track for life. But the truth and reality reveal facts that present a more horrific case of race, religion, national origin discrimination and deprivation of rights under the color of law. Georgia's *separate but equal* doctrine is a death sentence to both the proponent of the doctrine and the victim of the offenses. It maims the victim for life; and it blinds the proponents to reality. Lost in the abyss, the State is arguing that RY is not entitled to the protection of her parents or the law because it has a more compelling interest to launder military disability benefits from the parents, as a kickback to the government accomplice to a crime in stealing our child from her home and trafficking her to Ohio for immoral purposes. This injurious purpose by the State, brings us back to *Brown v. Board of Education of Topeka*, wherein this Court has held, laws that impose a *separate but equal* doctrine violate the Equal Protection Clause.

In the State of Georgia's version of the *separate but equal* doctrine, the State is proffering *one total stranger is equal to two nurturing parents*. We don't believe anyone else in America and even around the world (who does not boast a biased or prejudicial opinion) would agree with that statement. Certainly no one in Manobo, Cherokee, and Jewish communities nor anyone who lives in family societies, would agree. National origin discrimination and cultural segregation of our child from her mother, father, and Filipino family is extremely detrimental to the child. Natural parents and ancestral families, around the world, are the primary source for imparting culture, values, work ethics, and happiness to their biological children. The family society is the only harbor

for the unconditional love, affection, and protection that allow their children to engage in play, independent thinking, the free and independent development of self and the encouragement to attain self-actualization. Segregating our child from her nurturing nest is not in the best interest of the child; and it is not equal to the benefits of a child being raised by her parents. It does, however, severely amputates our daughters' opportunities to be successful in life; and it perpetuates the government's multigenerational two-state prison-pregnancy track in life, that disproportionately affect children of minority ethnicity. Page | 22

In *Brown v Board of Education of Topeka*, the Court held, harm to the child is so much greater, when the separate but equal doctrine is sanctioned by the State, as the enforcement of segregation of a child from her parents is interpreted as denoting inferiority of the parents and the child. In the case before this Honorable Court, the sanctions by Thomas Cole have severely eroded the moral, intellectual, spiritual, physical, and mental development of our child; and it deprives her of all the benefits she would receive in her own unitary family, that includes the love of her natural parents, her ancestral language, Manobo culture, Jewish religion, and neurological attachments.

In *Pierce v. Society of Sisters*, the Supreme Court held, "We think it entirely plain that the Act...unreasonably interferes with the liberty of parents...to direct the upbringing and education of [their] children under their control. As often heretofore pointed out, rights guaranteed by the Constitution may not be abridged by legislation which has no reasonable relation to some purpose within the competency of the state. The fundamental theory of liberty upon which all governments in this Union repose excludes any general power of the state to standardize its children by forcing them to accept [unnatural conditions and restraints]".

In truth and in fact, the State's *separate but equal* doctrine of segregating our child from her parents and ancestry fails to establish a compelling state interest, fails to satisfy strict scrutiny, and fails to satisfy the legal requirement of the alternative means test. In *Stanley v Illinois* 405 U.S. 645 (1972) the Supreme Court held, even "fathers of children born out of wedlock had a fundamental right to their children." There was simply no

need for the State of Georgia to launch a juridical pogrom against our family society, beat up our child, and torment our unitary family; and no reasonable man would conclude otherwise. The *separate but equal* segregation of our child from her nurturing environment, mother and father, culture and heritage, the unlawful seizure and arrest, transporting Page | 23 and trafficking across state lines for immoral purposes (as prohibited by *Public Law 61-277 - White Slave Traffic Act of 1910*) were neither *equal* nor in the best interest of our child. In fact, it was just the opposite. Rather than improving upon the moral, spiritual, intellectual, cognitive, mental, psychological, and physical development of our daughter, it destroys all that our daughter love and needs.

The Fourteenth Amendment states "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without [impartial] due process of law; nor deny to any person within its jurisdiction the equal protection of the laws". Family life, this Court has held, are fundamental rights protected by the Fourteenth Amendment. Separation and segregation of our child, from her nurturing nest of parental protection, based upon the State's perceived ideas of her race, her mother's national origin, and her father's Jewish religion, denies our daughter equal protection under the law; and therefore, the parents believe, it is unconstitutional.

The arbitrary severance of substantive due process in the government's unprovoked attack on our daughter was launched by the State and then by a court without jurisdiction. These aggressive and punitive acts were the first in a series of administrative decisions that offended the principles of the Constitution and the substantive due process clause. They unlawfully interfered with the mother, father, and Filipino family's fundamental right to raise their daughter and the daughter's fundamental right to enjoy a relationship with her parents and Filipino family. None of the oppressive government rulings satisfy the criteria for a compelling state interest; we would like to show that all such judicial transgressions of law were arbitrary acts of discrimination.

So the cause of action in this case is the State of Georgia's vicious, violent, discriminatory, and arbitrary attacks upon the principle of substantive due process and a discrete and insular minority family's equal protection under the law. It has nothing to do with anything else; and any effort to frame it as such is an attempt to cloud the issue. Page | 24

The case is a conflict between the State of Georgia's deprivation of rights under the color of law and the strength of the Constitution of the United States to enforce its Amendments. In *Brown v Board of Education of Topeka*, this Supreme Court struck down the separate but equal doctrine as inherently unequal and unconstitutional; and seventy years later, the State of Georgia would have U.S. courts to believe arbitrary discrimination and juridical prejudices are compelling state interests for separating children from parents.

Despite clear evidence of criminal convictions and evidence of violation of the *White Slave Traffic Act* by Julia Butler, despite convincing evidence of violations of *Destruction, Alteration, [and] Falsification of Record*, by Thomas Cole, and despite convincing evidence of fraud and violations of *Deprivation of Rights Under the Color of Law*, *Offenses Against Children*, as well as violations of other United States codes, by Andraya Mimms and the racketeering association, to defraud United States agencies, the lower court failed to apply the rule of law, adjudicate the facts, and administrate justice, subject to the Constitution and the United States Code. In his unwillingness to abide by the oath of his office, he in effect gave the perpetrators of the fraudulent scam a pass through U.S. courts and a pipeline for trafficking America's children into modern child slavery and indentured servitude, under the color of law. The Court failed to adjudicate the many clear questions of law that affect substantive rights and as a result, seriously affect the fairness, integrity of the Court and the public reputation of judicial proceedings.

The lower court's decision does not reflect one of impartiality, equity, and judicial independence; and therefore, his abrogation of the law has produced a false conclusion. The district court was informed of the fraud committed on the court by those associated with Julia Butler to defraud United States agencies; but rather than adjudicating the facts of the case, the lower court pivoted away from the violations of constitution and law and

framed the violations of the substantive due process of the Constitution in terms of judicial bias, without adjudicating the facts of the case.

Out of this intractable position by the State of Georgia, this just cause of action has risen to the attention of this Honorable Court with this writ of certiorari; and the parents, therefore, seek a writ of certiorari to challenge the constitutionality of the unprovoked hostile raid onto the land and into the zone of privacy of RY's Manobo-Cherokee family. We pray that this Honorable Court will grant the affirmation of the petition and establish a precedence, in this case, that will restore equal protections to Children of Color and their parents against disfiguring abuses of the totalitarian State and reaffirm to families across the nation that the United States of America, through the Supreme Court of the United States, is committed to safeguarding America's children from unprovoked and arbitrary attacks by the State upon the American family. Page | 25

REASON FOR GRANTINNG WRIT OF CERTIORARI

The pro se petitioners and biological parents of RY ask the Honorable Supreme Court for a Writ of Error for this court for a Writ of Certiorari as administrative orders and lower court decisions are in conflict with *Hardwick v Orange County*, *Brandenburg v Ohio*, *State of Ohio v Ariel Castro*, *State of Florida v. Gloria B. Williams*, *Wilson v. United States* (1914), *United States v. Demecia Washington*, *Duchesne v. Sugarman*, *Moore v. City of East Cleveland*, *Santosky v. Kramer*, *Stanley v. Illinois*, *United States v. Guest*, *United States v. Turkette* and other constitutionally-compliant court decisions across the country. There are compelling reasons for addressing the Supreme Court of the United States' discretionary jurisdiction is not solely because the case is one of child slavery in the jurisdiction of the United States but rather because the case is one of enticement, by the State, to induce our daughter to engage in child slavery and immoral activities, in the jurisdiction of the United States **under the color of law** [*Caminetti v. United States*] in violation of the *White Slave Trafficking Act*, and heinous violations of the *Fourth and Fourteenth Amendments of the Constitution of the United States*. In the words of RY's kindergarten teacher (days before our daughter was abducted by the

State) RY is a "well-adjusted child"; and in the words of police officer Wakefield O'Connor, hours before the State made an unreasonable seizure of RY, "RY is not in any danger in her father's care".

Notwithstanding, Thomas Cole and the State of Georgia launched a war of attrition on RY's parents, and her Filipino families' right to raise their child as well as the child's constitutional right to enjoy a relationship with her parents and her Manobo kindred. These are a mere miniscule fraction of the daily index of crimes against G-d and man that the racketeering enterprise reigned on our daughter. Out of this institutional oppression, by a totalitarian State, comes now the parents of our broken-spirited child, and prays that our writ of certiorari to this Honorable Supreme Court be unanimously accepted for: (1) Reasons of National Importance (2) Reasons of Conflict between the State of Georgia and the State of California i.e. *Hardwick v. County of Orange*, as well as case precedence established by this Honorable Supreme Court and (3) Reasons of Abuse of Discretion by the Lower Courts. Page | 26

In the dissenting opinion of *Korematsu v. United States*, Justice Murphy stated, singling out Japanese Americans and holding them in internment camps, "falls into the ugly abyss of racism." It is the same principle as "the abhorrent and despicable treatment of minority groups by the dictatorial tyrannies which this nation is now pledged to destroy. I dissent, therefore, from this legalization of racism. Racial discrimination in any form and in any degree has no justifiable part [whatsoever] in our democratic way of life. It is unattractive in any setting, but it is utterly revolting among a free people who have embraced the principles set forth in the Constitution of the United States. All residents of this nation...must, accordingly, be treated at all times as the heirs of the American experiment, and as entitled to all the rights and freedoms guaranteed by the Constitution." This opinion is also articulated in *Duchesne v. Sugarman*. These are just two of the countless opinions, on one hand, declaring arbitrary government legislation unconstitutional and on the other hand, proclaiming the sanctity of the family, which are the two common threads, that runs throughout the fabric of this case.

As in the case of *Hardwick v Orange Co.*, this case has arisen out of a conflict between the Fourteenth Amendment, familial right of association, substantive due process protections of the Constitution of the United States, and the State of Georgia's arbitrary attacks upon discrete and insular minority families and their children's right to enjoy a relationship with their biological mother, father, and ancestral kindred, free of tyranny, multigenerational discrimination and racial terror by the State. Because the Commerce Clause grants Congress the authority to regulate interstate commerce and to ensure "interstate commerce is free from immoral and injurious uses", as defined in the *White Slave Traffic Act*, this cause of action demonstrates how the State of Georgia created and implemented an incendiary doctrine of *demonic possession* and *arbitrary mental illness* to steal RY from her home (without parental consent) and traffic her across state lines i.e. *Caminetti v. United States*, where she was enticed and coerced to engage in immoral practices, forced to depend on her abuser for survival, and deprived of the protection of her parents and Filipino family. The cruel, inhumane, and brutal tactics of institutional warfare warrant the attention and just decision by the Supreme Court of the United States not just to overturn the unconstitutionality of the Thomas Cole doctrine of arbitrary discrimination against single fathers in general and Black fathers in particular; but the subsequent Supreme Court decision in this case is necessary to restore individuals' fundamental rights guaranteed by the Constitution for every American child in the United States from 1 to 18 years of age from a totalitarian State. Page | 27

Griswold v. Connecticut, states, the "marriage relationship fell well within a zone of privacy that protected couples from virtually all governmental regulations"; but with bold and brazen indifference to the Constitution, the state-racketeering enterprise [*United States v. Turkette*] invaded our zone of privacy, driven by the single-minded obsession of establishing itself as a totalitarian State, regulating the family society according to its arbitrary discretion, and choosing, at its pleasure, to carve in and out whoever it pleases, that serves its totalitarian will.

The Thomas Cole-Julia Butler fraudulent scheme, that has risen to the attention of this Honorable Supreme Court, not only stands in violation of the Mann Act, it also demonstrates when one State falsify documents in aid of racketeering, the consequences and the fallout from the resulting unlawful conduct metastasizes in all fifty states. Page | 28 Echoing the Fourteenth Amendment again, no State law may violate citizens' rights that are enshrined in the U.S. Constitution; and if a State passes such a law or a judge drafts such an arbitrary rule, then the judiciary is allowed, indeed obligated, to overturn it, on the basis of its unconstitutionality.

Selecting just one arbitrary incitement to imminent lawless action phrases, by Thomas Cole and the racketeering enterprise, that highlights the ghastly nature of the usurpations of a tyrant, over the last five years, he writes, "The child shall not be returned to the father without order of the Court". This level of tyranny exceeds a respect for the laws of nature and God. Nothing can be more blatant, callous, tyrannical, and illuminating than these dictatorial words of an all-knowing tyrant. Clearly, this arbitrary discrimination is an unprovoked totalitarian attack on substantive due process, the Equal Protection Clause, the Supremacy Clause, the Cruel and Unusual Punishment Clause, the Exception Clause, and countless violations of the United States Code.

It satisfies no legal standards of objective analysis and only serves to deny constitutional liberties, fundamental rights, equal protection, and substantive due process of a particular discrete and insular family, upon a particular minority child, a particular Manobo mother, a particular Manobo tribe, a particular Jew, and a particular Cherokee father. In his dissent in *Korematsu v. United States*, Justice Jackson writes, "A military order, however unconstitutional, is not apt to last longer than the military emergency. [However] once a judicial opinion rationalizes such an order to show that it conforms to the Constitution [then] the principle [of that order] lies about like a loaded weapon, ready for the hand of any authority that can bring forward a plausible claim of an urgent need". Harvard University's Law Professor, Noah Feldman, is quoted as saying, "a decision can be wrong at the very moment it was decided—and therefore

should not be followed subsequently;" and this is certainly true with regard to Thomas Cole's arbitrary, discriminatory, and unconstitutional decrees.

If the test of Strict Scrutiny is applied to the arbitrary rule of Thomas Cole that clearly violates the substantive due process of its targeted family, then the first question to ask and answer is: (1) Do the Thomas Cole laws infringe upon protected liberties? From a cursory review, it infringes on religious freedom, as it deprived our daughter of access to synagogue, Jewish day school, bat mitzvah and everything Jewish. It interferes with the family's right to privacy. It incited the unreasonable seizure of a first-grade child, without probable cause. It mutilated the child's neurological bonds to her umbilical cords to life and sentenced her to be tortured with merciless cruelty, in the house of her abuser. Clearly, the Thomas Cole rules encroach upon constitutionally protected liberties. (2) Is the liberty a fundamental right? The right to raise ones' children is a fundamental right guaranteed by the Fourteenth Amendment. (3) Does the law advances a compelling governmental interest? No. The Thomas Cole laws serves no compelling State interest and (4) Does the law implement the least restrictive means of the government interest? The law actually is radical, perfectly flawed, and unsupported in legal reasoning, scientific knowledge, moral judgment, or religious principles. It actually implements the most destructive means to accomplish an undefined governmental interest. It represents a departure from universal standards of legal jurisprudence and judicial independence. There is no clear compelling government interest; and any impartial standard of objective analysis will show the discriminatory doctrines of Thomas Cole, against our family violated the spirit of the Constitution, in general, and the 14th Amendment in particular; and as a result, they are bitterly oppressive and wholly unconstitutional!

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When the parents brought these vital concerns to the attention of the District Courts, the lower courts failed to adjudicate the facts impartially and with judicial independence. They reframed the case as custody despite the fact it was filed as a 42 USC 1983 Civil Rights and RICO cause of action. If the case was custody, then one call to any police station would have led to the arrest, prosecution, and long term sentencing of

convicted receiver of stolen property, Julia Butler for child kidnapping. But with Thomas Cole, Andraya Mimms, and a group of lawyers associated together for the common purpose of inveigling our child and transporting her as a passenger in interstate commerce, from the State of Georgia to the State of Ohio, with the intent that she shall be the property of Julia Butler to entice, coerce and engage in immoral and injurious practices, law enforcement across the country provided no police protection to our child nor any safety for our discrete and insular family. He used our daughter to expose our address then refused to return her to the safety of her parents. Page | 30

It is the nonexistence of equal protection of discrete and insular children, in America, that amplifies the need and reasons for the Supreme Court to grant a writ of certiorari; for the case of our daughter clearly demonstrates the actions of a totalitarian State: i.e. the invalid arrest of a five-year-old minority Scout leader without exigent circumstances nor probable cause, the use of State incarceration as a torture chamber of a child, the conspiratorial kidnapping of the Scout leader from her nurture environment without the parents' consent, depriving the child of her mother and father, falsifying documents under the color of law, attacking the parents with vexatious litigation, fabricating mental illness in aid of racketeering, and committing attempted medical homicide to traffic a scam through U.S. courts...these are the signs of a totalitarian State.

In *Lassiter v. Department of Social Services*, this Court established the precedence that "parents have a due process right to a fundamentally fair procedure; and [that procedure] may require the appointment of counsel. " Nevertheless, when the parents requested legal representation from the courts, the requests were summarily denied to the pro se litigants. Every opportunity to adjudicate the case, according to universal standards of fair and impartial legal jurisprudence, were struck down by the lower courts. They blocked and obstructed the case from being heard by a jury of Manobo mothers, Cherokee dads, Jewish fathers, rabbinical authorities, Hebraic bobbies, Filipino priests, or any person whose concept of *family unity* was representative of the minority family's peers.

They barred the parents from proffering relevant evidence and critical information permissible under the Federal Rules of Evidence that speaks to the nature of fraud and unlawful activity at the heart of the case. The Doctrine of Chances established in *Westfield Ins. Co. v. Harris* could have easily shown the reoccurrence of a similar act was not accidental; but rather it occurred by design. But no rules of evidence were employed by the lower court. Online photographs of our child posing to an Internet audience for the exploitation of the child, and police reports of domestic violence at three o'clock in the morning, were dismissed. Evidence of a history of sexual molestation of children in the child abductor's home, insurance fraud schemes, by the abductor, in Cuyahoga Courts, a criminal record conviction of receiving stolen property, and a fraudulent guardianship petition in a court of law to defraud United States agencies, were summarily blocked by the lower court. Material evidence of the abductor's counterclaims in Superior Court, demanding cash, from the parents for stealing the parents' child, was given no standing. Page | 31

The abductor's own words confirming her involvement in the State's racketeering conspiracy to defraud the public, RY's parents, police, and government agencies...all of these critical files of evidence and material facts were summarily dismissed by the lower court. Plus, a vast array of corruption between Chatham County Department of Family and Children Services and the Chatham County Juvenile Court (i.e. *the Senate report of Corrupt Business of Child Protective Services by Georgia Senator Schaefer, 50th District, 2008* and *11Alive News Investigative Report of Teen Boy on Demand [Sex Trafficking] 2020*) can be traced over a period of more than twenty years—revealing decades-old patterns, of child-trafficking and racketeering, in violation of the *White Slave Traffic Act*.

When Thomas Cole, Andraya Mimms, Julia Butler and the associates of the enterprise refused to participate in a Rule 26(f) Conference ordered by the District Court, the lower court blamed the parents and dismissed the case. In the May Cuyahoga Probate hearing, two abuses of discretion that shocks the conscious and warrant judicial notice in this appeal of that decision is (1) the lower court's denial of the parents' prayer to dispute the dozens of false statements in the fraudulent

Application for Appointment of Guardian of Minor filed by Julia Butler, Andraya Mimms, Thomas Cole and the associates of the enterprise in Probate Court to eradicate the child from her biological mother, father, and Filipino family and (2) the convicted criminal's audaciously expressed testimony to use our daughter, as a money tree, to engage our child in immoral purposes and to fleece U.S. treasuries for improper financial gain. The parents believe the prejudicial nature of the lower court's position far outweighed the probative value of the decision. Page | 32

In refusing to adjudicate the facts of the cause of action, the lower court also erred by framing the case as a custody matter, when in fact custody matters, in Chatham County, are heard in Superior Court. Not Juvenile Court. In the event a so-called "custody" case comes out of Chatham County Juvenile Court, there is a corresponding just cause for suspicion, given the financial and symbiotic relationships between Thomas Cole of the Juvenile Court (a court with zero jurisdiction over 60-year-old grandfathers) and the Chatham County Department of Family and Children Services. Custody matters in Chatham County originate in Chatham County Superior Court, after a petition of dispute is file by the legal parent(s). There is no such voluntary petition in any court filed by the parents for such action. It was the State (in truth and fact) that filed a knowingly false police report to deny our unitary family substantive due process and to deprive RY of her language, culture, heritage and a relationship with her parents and Filipino family.

The lower court erred in framing the facts of the case as limited to the State of Georgia. In clear violation of the *White Slave Traffic Act*, Thomas Cole-Julia Butler unlawful transportation of RY from the State of Georgia to the State of Ohio for the purpose of coercing, inducing, and engaging her in immoral and injurious practices is, without a doubt, villainous interstate traffic of a girl child. It is exactly the kind of unlawful conduct the Act "seeks to reach and punish...[as an] interstate commerce of women and girls, with a view to [purge] the unlawful purposes prohibited." The fact that the villainous transfer was done through fraudulent scheme, vexatious litigation, and unlawful conduct, and through U.S. courts, corroborates evidence supporting a

deliberate violation of *Deprivation of Rights Under the Color of Law, Destruction, Alteration, or Falsification of Record* as well as other violations of the law. This narrow framing of the case allowed one party to be heard and not the other.

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Only Julia Butler, Andraya Mimms, Thomas Cole and associates of the enterprise were given the ear and support of the court. Despite a legal obligation to hear both parties, the lower court gave voice to the villainous party only; and he refused to adjudicate the case with impartiality, equity, fairness and subject to the Constitution and the laws of the United States. The court erred in saying the offenses of the Thomas Cole-Julia Butler scam were limited to the State of Georgia. They are not. They are inchoate offenses and move, in time and from place to place. Yes, the initial violation of the First Amendment prohibited government speech occurred in Georgia. The kidnapping occurred in Georgia. Falsification of documents in aid of racketeering [18 USC 1519] were executed in Georgia; but they were also executed in Ohio.

The financial fraud and money laundering on the Department of Veteran Affairs, Social Security Administration, Ohio Job and Family Services, Cuyahoga Probate Court, are not crimes relegated to the State of Georgia. The kidnapping of RY's dad, occurred in Ohio, the stalking, harassment, unlawful detainment, fictitious disorders imposed on another by Julia Butler, Archana Brojmohun, and Elizabeth Cianciolo, all occurred in Ohio; and the attempted medical homicide was a targeted homicide attempt by associates in the State of Ohio and the State of Georgia. At the very least, there is diversity of States and diversity of countries; and as such the offenses are inchoate interstate international crimes, against the family society. Additionally, the kidnapping of our daughter is also a crime against her mother; and the fraudulent enterprise inflicts daily and continuous injury to the mother-daughter bond and daughter-daddy bond every second the child is held captive, in a prison of peonage in Ohio, created by violators of the law in Georgia. Every night and day when both RY and her mother awaken with a broken heart as a result of deprivation of familial association by the State of Georgia and Ohio, is that a crime in Ohio, Georgia, or the Philippines? These are dangerous precedence!

While there were other errors in the lower court's decision, we will highlight one last abuse of discretion. The lower court first challenged and then overruled the issue of diversity in the case. 28 U.S.C. 1332(2) - *Diversity of Citizenship* states, "The district courts shall have original jurisdiction of all civil actions where the matter...is between...citizens Page | 34 of a State and citizens...of a foreign state. The Republic of the Philippines is neither a state nor territory of the United States; and as such, the case against Julia Butler filed in district court is correctly filed by authority of 28 U.S.C 1332(2); and the lower court erred in his judgment. Additionally, *Public Law 61-277 - The Mann Act* states, "any violation of any of the above sections two, three, and four shall be prosecuted in any court having jurisdiction of crimes within [any] district...through...which any such woman or girl may have been carried or transported as a passenger in interstate or foreign commerce...and the word 'person', as used in this Act, shall...include corporations, companies, societies...associations [and enterprises]". 25 USC 1914 states, "Any Indian child who is the subject of any action for foster care placement or termination of parental rights under State law, any parent or Indian custodian from whose custody such child was removed, and the Indian child's tribe may petition any court of competent jurisdiction to invalidate such action upon a showing that such action violated any provision of sections 1911, 1912, and 1913 of this title."

Many but not all of our fundamental rights are housed in the Fourteenth Amendment; and in that authority and like all mothers and fathers across America, my wife and I have every parental right as do they to enjoy a relationship with our own biological child, raise our child according to the dictates of our conscious, teach our daughter her mother's tongue (Tagalog), bring her up with Jewish values, provide her with a sense of stability and permanence within her nurturing environment (unmolested by the State). We enjoy a fundamental right to enroll our daughter in Hebrew school and midrasha to sharpen her purpose in life, maintain her Jewish playmates and friends, nourish her neurological attachments, protect her continuity of relationship with her

parents, and sharpen her intellectual and cognitive development by supporting her uninterrupted piano lessons and Girl Scouts of America memberships.

But the State of Georgia and Thomas Cole are determine to block our path and deprive our daughter of her birthright, rite of passage, bat mitzvah, and her Manobo and Cherokee heritage, which makes them a totalitarian State and a tyrant, respectively. They seek the eradication of everything that our daughter has come to know, love, trust, and believe. They seek to rupture her bonds to her biological mother, father and Filipino family. They seek to exterminate the family and its right to exist because of their incapacity to respect human diversity and the equality of humanity. Out of this religious intolerance, racial hatred, and ethnic discrimination justice cannot breathe. Only judicial terrorism and juridical anarchy are allowed to exist. This brand of injustice runs afoul of all the good precedence and legal principles that has come out of the Supreme Court.

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The Supreme Court is very clear on the right of parents to raise, teach, train, and educate their children as a matter of constitutional protection. In *Moore v. City of East Cleveland*, this Court held, when States choose to regulate family society, it imposes extreme and "intrusive regulations on the family." The partnership, for example, of Thomas Cole and Julia Butler, as European colonist and African caboceer seeks to slice, dice, and abort an American family, that they do not own, according to their arbitrary dictates, capricious discrimination and improper financial gain, in defiance of the precedence established by this Honorable Supreme Court. Countless times, the Court has held, the United States Constitution protects the sanctity of the family; and as such, the States may not make any rules that are in conflict with the Constitution. In *Pierce v. Society of Sisters*, the Court held, the responsibility of education of children "belongs to the child's parents"; and in *Santosky v. Kramer*, this Supreme Court held, even parents who are found to be "unfit", retain constitutionally protected parental rights.

This evidence is extremely probative information in the unlawful nature of the cause of action. Yet, with indifference to the Federal Rules of Evidence, all evidence to adjudicate the case equitably and impartially was summarily dismissed, by the lower

court judge. It seems clear, the lower court deliberately steered clear of exposing and reprimanding violations of law under the color of law as unconstitutional, albeit with the knowledge that they were. There are more than 730,000 children of single father Black families in the United States; and the attack on America's Black families is not exclusively localized to the State of Georgia. However, a child and family victim in one state is a victim in every state. The attack on our daughter is one that 1.23 million single father Black families face every day, without equal protection of the law. All are vulnerable and at high risk of unprovoked attack on our love ones, the trafficking of our children by the government, torturing our babies in public and private prisons and the steering of our children into indentured servitude and sex trafficking [*Caminetti v. United States*, *State v. Wilkes*, and P.L. 61-277], by the tyranny of the State. Page | 36

This petition for writ of certiorari and immediate legal intervention is requested by the biological mother and father of RY, a discrete and insular minority family, because United States courts in Georgia and Ohio desperately needs leadership from the Supreme Court. If this Honorable Court does not set a just and impartial precedence in this case, then the gross miscarriage of justice in the lower courts, gives life to a dangerous predatory precedence, that is a ticking bomb, at the foot of all Girl Scout leaders and every American child. First tier judges are deliberately and maliciously abandoning the Rule of Law and forming alliances with seasoned lawbreakers and falsifying documents under the color of law, to effectuate fraudulent scams. When these violations were brought to their attention, second-tier judges turned a blind eye to the unlawful conduct; and this is a symbiotic relationship that is dangerous and undermines the entire justice system.

This is a complete departure from universal standards of legal jurisprudence to search for the truth and adjudicate the law with equity, fairiess, impartiality, and justice. It is a total collapse of the rule of law. Our prayer and plea to this Honorable Court is not only for our own beloved daughter whose life is being taken by a totalitarian State for no other reason than it answers to no one; but our prayer is also for the 23 million children in the United States under five years of age in general and the 1.23 million discrete and

insular single fathers in the United States in particular who are all at high risk of the totalitarian State. This national threat to Black and Cherokee fathers requires this Honorable Court to act to protect minority children, from a predatory and tyrannical State.

Immediate action, by this Honorable Supreme Court, is in the best interest of America's children. Failure to act, would be contrary to the welfare of the children, namely because single Black fathers are providing for their children; and the State, simultaneously, is demonizing them as *unfit* parents, attacking their families, and commercializing a false narrative of Black families, as a subculture group without fathers in the home. This narrative perpetuates discrimination against fathers of African descent as *deadbeat dads with chronic schizophrenia*. In this state-sanctioned narrative of good, evil, and prohibited government speech, the State sits at the head of the table and there is no seat at the table, at all, for Black fathers within their own families and among their own children. The government (exemplified by the State of Georgia, Thomas Cole, and the State of Ohio) is falsely proclaiming that single fathers and fathers of African descent in particular, have no right to have a relationship with their own biological children; and minority children, they contend, don't deserve to enjoy a relationship with their fathers.

RY is the child of Judith and Omri Yigal. Not Julia Butler; and not Thomas Cole. When the racketeering associates launched their fraudulent scam upon the five-year-old Girl Scout of America troop leader, they also attacked the principles of the United States and the prohibitions of its Constitution. It was an unprovoked attack on all American families and every American child. It was a scam upon the United States justice system and U.S. courts. The child-trafficking scheme was a deliberate transgression of the law, by a 23-member group of associates, to inject a benign cancer into the bloodstream of U.S. courts. But U.S. courts and the justice system that supports them has pioneered a path of justice for 232 years; and while it has made its share of mistakes, here and there, and as a result was compelled to overrule its own precedence, it nevertheless still has a sterling record in doing more good for the United States than bad, which brings America's collective breath to the case before this Honorable Supreme Court, today.

It is the opinion of the parents of Scout RY, having suffered the terror, torture, and trauma over the last five years of the trafficking of our daughter into modern child slavery at the hands of a State-sponsored racketeering scheme under the color of law, we believe the United States of America doesn't need this kind of white collar lawlessness, judicial pogroms against Black fathers, and self-righteous vigilantism as the abuse of judicial discretion has demonstrated in this case. Neither the Supreme Court of the United States nor families, within the jurisdiction of the United States need county, state, and district judges misjudging with prejudice and arbitrary discrimination, the Hebraic practices, religious customs and mental appropriateness of law-abiding Jewish-Cherokee abbot (fathers) and eema'ot (mothers) providing for their "*well-adjusted*" children, in the privacy of their reservations, zones of privacy, land, buildings, synagogues and homes. America does not need the judges of its courts, vacating their oath of office, preying upon America's children, stoning guiltless American mothers, misusing the government to order a hit on devoted American dads, and anointing themselves above the Constitution of the United States. The American family does not need judges succeeding from the guidelines of the Constitution and the laws of the United States. America doesn't need judges conspiring with convicted criminals, inciting lawless action, inveigling America's children, and trafficking them across State lines, without the consent of their parents.

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American families don't need judges providing judicial cover to invalid arrest, abduction, and child-trafficking. The country doesn't need to go after sixty-year-old discrete and insular minority fathers, who are simply providing for their children, and subject them to vexatious litigation in courts without jurisdiction and demonization, as subhuman. America does not need county court judges misusing State incarceration facilities, as torture chambers for minority children. American moms and dads don't need the State to steer their Girl Scout troop leaders into State prisons of peonage, mob families, fatherless societies, child prostitution, and immoral practices. Parents don't need judges either conducting or inciting illegal activity, from the bench; nor do they need first tier judges deliberately making malicious errors of law and then politicking those abuses of discretion, through probate and district courts throughout the country.

America doesn't need seasoned lawyers stalking, harassing, and targeting minority fathers, for extermination; nor does the American family need those seasoned attorneys becoming involved, in any way, in the subjugation of minority American fathers to human experimentation

without the consent of the person; and upon the permanent injury or death of the person, justifying a fraudulent scheme on the doctored outcome of the experiment. America doesn't need judges profiteering on the suffering of children, disenfranchising discrete and insular Girl Scout troop leaders from their heritage, demonizing devoted fathers of African descent for wearing a yarmulke to court, and elevating themselves above the Constitution, because they have the power to do so.

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The United States doesn't need to return to the days of Antebellum Georgia, Leo Frank, Moore's Ford Lynchings, and vigilante killings i.e. Ahmad Auberry, of men of African descent...be it with a shotgun or the lethal misapplication of the laws of the United States. The country doesn't need Confederate States judges desecrating United States courts by sparsing the law to revive constitutionally-prohibited institutions of child slavery, indentured servitude, and peonage. Given the human atrocities families have suffered at the hands of judges going rogue, the American family doesn't need any State imposing intrusive restrictions on our children, disrupting their life with terror and occupation, and wrecking their families with racist ideology and baseless government persecution.

Therefore, pursuant to substantive due process and the Equal Protection Clause of the Fourteenth Amendment to the Constitution of the United States, it is our humble request, to Chief Justice Roberts, Jr., Associate Justice Thomas, Associate Justice Breyer, Associate Justice Alito, Jr., Associate Justice Sotomayor, Associate Justice Kagan, Associate Justice Gorsuch, Associate Justice Kavanaugh, Associate Justice Barrett and this Honorable Supreme Court of the United States, that the writ of certiorari from the pro se biological parents of our innocent, guiltless 11-year-old Filipino-Cherokee, Jewish Girl Scout leader, be granted; and the highest Court of this nation, will render a decision, that will protect the substantive due process of America's children and defend them from the abuse, terror, torture, and trauma of the totalitarian State.

CONCLUSION

For the foregoing reasons, Judith Yigal and Omri Yigal, the biological parents of RY respectfully prays the petition for a writ of certiorari should be granted. DATED this ~~3rd~~ day of ~~June~~, 2022. Respectfully submitted.

/s/ יגאל ויהודית עמרי

Omri and Judith Yigal,

The Biological Parents of RY

"He who saves a single life,
saves the world entire."

THE TALMUD