

[DO NOT PUBLISH]

In the

United States Court of Appeals

For the Eleventh Circuit

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No. 24-10437

Non-Argument Calendar

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RONA JOHNSON ADEOYE,

Plaintiff-Appellant,

S.A.B., et al.,

Plaintiffs,

*versus*

CLAYTON COUNTY DFCS EMPLOYEE(S),

CLAYTON COUNTY JUVENILE COURT,

CLAYTON COUNTY DEPARTMENT

FAMILY CHILDREN SERVICES,

CLAYTON COUNTY POLICE

DEPARTMENT SECTOR 3 PRECINCT,

Defendants-Appellees.

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Appeal from the United States District Court  
for the Northern District of Georgia  
D.C. Docket Nos. 1:22-cv-02840-VMC,  
1:22-cv-02838-VMC

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Before ROSENBAUM, LUCK, and LAGOA, Circuit Judges.

PER CURIAM:

This appeal is DISMISSED, *sua sponte*, for lack of jurisdiction. The 30-day statutory time limit required Rona Adeoye to file a notice of appeal from the district court's September 9, 2022 final judgment on or before October 11, 2022. *See* 28 U.S.C. § 2107(a); Fed. R. App. P. 4(a)(1)(A). However, Adeoye did not file a notice of appeal until February 7, 2024.

Further, the record contains no basis for relief under Federal Rules of Appellate Procedure 4(a)(5) or 4(a)(6) because Adeoye did not move to extend or reopen the appeal period and more than 180 days have passed since the judgment was entered. *See* Fed. R. App. P. 4(a)(5) (providing that a party may move to extend the time for filing a notice of appeal within 30 days of entry of final judgment); *id.* R. 4(a)(6)(A) (providing that a party may move to reopen the appeal period not later than 180 days after the order or judgment is entered). Accordingly, the notice of appeal is untimely and cannot

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Opinion of the Court

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invoke our appellate jurisdiction. *See Green v. Drug Enf't Admin.*, 606 F.3d 1296, 1300 (11th Cir. 2010).

No petition for rehearing may be filed unless it complies with the timing and other requirements of 11th Cir. R. 40-3 and all other applicable rules.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

RONA JOHNSON ADEOYE, S.B.,  
A.B., and A.A.

Plaintiffs,  
v.

CLAYTON COUNTY DFCS  
EMPLOYEE(S), CLAYTON COUNTY  
JUVENILE COURT, CLAYTON  
COUNTY DEPARTMENT FAMILY  
CHILDREN SERVICES, AND  
CLAYTON COUNTY POLICE  
DEPARTMENT SECTOR 3  
PRECINCT,

Defendants.

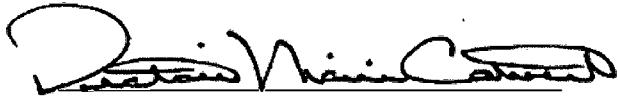
Civil Action No.  
1:22-cv-02840-VMC

**ORDER**

On August 18, 2022, the Court entered an Order dismissing the consolidated Complaints (Docs. 3, 6, 7) in this case for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B)(ii). In that Order, the Court directed Ms. Adeoye “to file a single amended Complaint by **NO LATER THAN** September 2, 2022.” The Court warned Ms. Adeoye that “[f]ailure to comply with this Order will result in dismissal of this action without prejudice.” A review of the docket shows that Ms. Adeoye failed to file an amended Complaint by September 2, 2022. Accordingly, it is

**ORDERED** that this civil action is **DISMISSED WITHOUT PREJUDICE** for failure to comply with a lawful Order of the Court. The Clerk is directed to close the case.

**SO ORDERED** this 9th day of September, 2022.



Victoria Marie Calvert  
United States District Judge

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

RONA JOHNSON ADEOYE,

Plaintiff,

vs.

CLAYTON COUNTY DFCS EMPLOYEES,  
et al.,

Defendants.

CIVIL ACTION FILE

NO. 1:22-cv-2840-VMC

**JUDGMENT**

This action having come before the court, Honorable Victoria M. Calvert, United States District Judge, for consideration, it is

**Ordered and Adjudged that the action be DISMISSED WITHOUT PREJUDICE for failure to comply with a lawful Order of the Court.**

Dated at Atlanta, Georgia, this 9th day of September, 2022.

KEVIN P. WEIMER  
CLERK OF COURT

By: s/L. Beck  
L. Beck, Deputy Clerk

Prepared, Filed, and Entered  
in the Clerk's Office  
September 9, 2022  
Kevin P. Weimer  
Clerk of Court

By: s/L. Beck  
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

Rona Johnson Adeoye

Civil Action No.  
Consolidated Case No.

vs.

1:22-CV-02838 VMC  
1:22-CV-02839 VMC  
1:22-CV-02840 VMC

First Amended Complaint, Request  
For Class Certification & Jury Trial  
Demand

*Clayton County Juvenile Court*

*Fulton County State Office For The Depart' Of Family Children Service*

*Clayton County Department Of Family Children Service*

*Clayton County Police Department Sector III Precinct*

*Clayton County Sheriff Department*

Defendants

Amended Complaint/Jury Demand

Announcement Of Appearance

Come Now, Plaintiff RONA JOHNSON ADEOYE pro se contained in Status, 28 U.S.C.

Section Pursuant 1654., before The United States District Court For The Northern

*District Of Georgia Atlanta Division Magistrate Honorable Judge VICTORIA M. CALVERT and For The United States District Court Judge JOHN K. LARKINS III to reopen, intercede, Safeguard and Protect the Constitution and Statutory Rights of this present case and transfer this case over to The United States Eleventh Circuit Court Of Appeals. In this Amended Complaint, Often referred to as "Section Pursuant 1983" in regards, to legal cases- The Civil Rights Act Of 1871 grants citizens to the right to legally challenge civil rights violations through federal lawsuits. This legal tool is used when State' officials and local governments act deliberately and maliciously in an unconstitutional manner, allowing plaintiff access to monetary damages and injunction relief for their grievances, exhibits and complaints. 42 U.S.C Section Pursuant 1983, provides essential protection against "oppressive governmental behavior" that violates basic human rights doctrine within Constitution' and Federal laws' are alike, ensuring that plaintiff' have equal opportunity under the law regardless of lawless acts. Section Pursuant 1983.,*

**JURISDICTION AND VENUE**

*This, Court has jurisdiction over this action which alleges violation of federal law to 28 U.S.C Section Pursuant 1331-1343. Section 1331, Title 28 of the United States*

*Code is the general federal district courts with original subject matter jurisdiction over "all civil actions arising under the Constitution, Laws or Treaties of the United States. The Supreme Court held that Bivens does have a cause of action for damages arising from the federal agents Fourth Amendment. See. Bivens v. Six Unknown Named Agents, 403. U.S. 388 (1971).*

## VIOLATIONS

*Plaintiff alleges causes of action for RICO. "Racketeering Influenced Corrupt Organizations", Section Pursuant 16-14-4]; Geneva Convention Code 18 U.S. Code Section Pursuant 2441-, regarding to the Geneva Convention Code in this claim Law enforcements violated the Geneva Convention Code when they taken plaintiff into unlawfully in handcuffs, dragged, pulled plaintiff down the parking lot side walk physical assaulted and caused damage to the plaintiff body and restricted her from being held against her will and repeatedly committed physical harm on several occasions and that's considered "War Crimes", especially being a female because the Geneva Convention Code makes reference to woman and children to not to be harm. Even in the time of War it was forbidden to abused a certain population because they were the weaker vessel. In the time of war prisoners of war were to be treated humanely and their not supposed to be tortured nor with*

*cruel unjust punishment. We are not even in time of War and law enforcements treated plaintiff like plaintiff was in foreign country prisoner without justice and doing so, abused their authority. Their actions acted inhumanely, cruel and unjust. The welfare are conspire and also violated the Geneva Convention Code when they kidnapped plaintiffs children with the help of law enforcement without a probable cause., and deprived the plaintiff of her children for years. Their actions were void without legal effect and force. Plaintiff assert claims in Crimes against humanity 22 U.S Code Section Pursuant 8213(b) solely regarding to but not limited to imprisonment, severe deprivation of physical liberty in violation of fundamental rules of international law, other inhumane acts of similar character intentionally causing great suffering., enforced disappearance of persons. Attacks that is directly against any civilian population means a course of conduct involving the multiple commission of acts., pursuant to or in furtherance of a State or organizational policy to commit such attack;[conspiracy to hide larceny theft. [including conspiracy to commit fraud and aiding and abetting fraud 18 U.S.C Section 2] unjust enrichment taking plaintiffs children for kidnapping for ransom unlawfully separating them from one another which cause "siblings mental agony strain" which causes more harm than good and placing them in numerous unsafe, unfit, facilities, motels even in homes where placements were*

*engaged in child sexual exploitation to children in one of the placement by a foster father relatively an incident occurred, was told by the plaintiffs daughter that child sex crimes was occurring, physical abuse, deprivation of food, and uninhabitable living conditions, to profit and gain financially a government percentage of the plaintiffs children being [forced] in [stay] hostile situations.[Emphasis Added], even disregarding plaintiff children when they say they want to leave. Clayton County Dept' Family Children Service silenced the plaintiffs children from speaking about the physical abuse and use reverse child psychology to change the children against their biological mother for them not to inform their mother anymore about the physical abuse they are traumatizing encountering. Clayton County Dept' Family Children Service ceased and embezzled plaintiffs' minor children social security disability funds that was in plaintiffs name, and use plaintiffs children for Internal Revenue Service (IRS) funds for child tax credit purposes, by defrauding the government system in laboring insider trading, bribery 18. U.S. Code Section Pursuant 201-, kickback embezzlement paying and receiving kickbacks in a corrupt practice that interferes with an employee's or an officials ability to make unbiased decisions, often referred to a type of bribery to keep the scheme private. Money laundering, [conspiracy fraud 18 U.S.C Section Pursuant 371].,[defective business practice 15 U.S. Code Section Pursuant 45], criminal kidnapping and abduction 18.*

*U.S. Code Section Pursuant 1201, child trafficking 18. U.S.C Section Pursuant 1581], identity theft 18. U.S.C Section Pursuant 1028, mail [18 U.S.C. 1341]and wire fraud [18 U.S.C 1343] public corruption 18 U.S.C Section Pursuant 201], bureaucratic corruption, False Imprisonment 28 U.S.C 2680 1346(b)], Intentional tort claim resulting in defendants understood the actions would result in harm but acted without showing any caution. False Arrest, False Charge, [Deformation, relatively to libel and slander 28 U.S. Code Section Pursuant 4101], [Obstruction Of Justice 18. U.S.C Ch. 73]., [False Statements Fraudulent Concealment 18 U.S.C Section Pursuant 1001]., Consumer Fraud 15 U.S.C Section Pursuant 45(a)(2)., The most general applicable federal consumer protection statute regulating conduct in the United States is the FTC Act, which prohibits “unfair”, deceptive acts or practices in or affecting commerce. See. FTC’s Policy Statement on Deception (1989)., and camouflage deception under socioeconomic status. Discovery Rule is the alternative Statute of limitation is told until the actually crimes have been found out. The discovery rule applies to the plaintiffs claim because there's no possible way that an individual could find out all the violations that all these state, government and agencies committed against plaintiff because plaintiff was continued being harassed, threaten under duress and coerced attacks by law enforcements and the welfare dept’, and constantly retaliation against*

*plaintiff every time plaintiff asserts her rights to the Constitution Amendment., To be free from unlawful intrusions on privacy, and excessive force by tortfeasors.,*

*Plaintiff seeks restitution for unjust enrichment according to a wrongful retention of benefits. Plaintiff, alleges criminal offenses of a grand jury indictment on all defendants resulting in a fabricated and the act to perform deformation of a[n] false arrest, false charge, false imprisonment, and kidnapping of abduction Title*

*16- Crimes and offenses Chapter 5- Crimes against the person Article 3-*

*Kidnapping, false imprisonment, related offenses Section Pursuant 16-5-*

*40. Any person commits the offense of kidnapping which such person abducts or*

*steals away another person without lawful authority or warrant and hold such*

*other person against his or her will., For the offense of kidnapping to occur,*

*movement shall be significant provided however, that any such slight movement*

*of another person which occurs while in the foregoing movement conceals or*

*oscillate the victim, makes the commission of another offense substantially easier,*

*lessens the risk of detection, and avoids the purpose of apprehension. Color of*

*law actors perjury and disguises under false statements 18 United States code*

*Section 1001, Title 18, United States Code Section 1001 falsifies, conceals, cover up*

*by any tricks, scheme, device, a material facts., makes it a crime to knowingly and*

*willfully make any material false, fictitious, fraudulent statements of entry or*

*misrepresent facts on the plaintiffs case whom was conducted by “color of law” state of county actors” against the plaintiff and publicly humiliation with fabrication of defamation to convert, twist of deception of conversion and to change the outcome of plaintiffs reputation. All defendants “color of law” actors Section Pursuant U.S.C Code 242 Of Title 18 states “makes it a crime for a person acting “under color of law” to willfully deprives a person of a right or privilege protected by the Constitution or Laws guaranteed by the United States. [A]n example of a specific law that applies to the “color of law” is the Fourth Amendment, which protects individuals from unlawful search of seizures. 18 U.S.C Section Pursuant 242 Deprivation of rights under the color of law occurs when a law enforcement officers, other government officials unlawfully’ takes away the rights of another in unreasonable search of seizures without probable cause under a warrant less entrance without any valid search warrant. Defendants embezzled property from plaintiff “theft” by taking by conversion to conceal details of the act” without permission; “illegally” taken possession of plaintiff's vehicle towed and impounded it without probable cause to do so., and home was apprehended unlawfully and recklessly vandalized without a search warrant. Plaintiff alleges these such color of law actors also unlawfully seized plaintiffs home keys keeping the plaintiff from entering into her residing property. Plaintiff,*

*contend that defendants operate almost exclusively via the internet and use of electronic means as reliable forms of contact with each other and their investors records shall be electronically seized by the Federal Bureau Of Investigations and to recover deleted files under recovering fraudulent documents. Plaintiffs' failure to obtain substantial justice in In Clayton County Juvenile Court lead to suits being filed in The United States District Court For The Northern District Of Georgia Atlanta Division under the Title 42 United States Code Standard 1983. This civil action suits petition for relief of all orders made in violations of the law, that due process of law be allowed and further issue relief as the court deems appropriate. These color of law actors Imposes civil liability for intentional violation of constitutional, and statutory of rights of individuals by person acting under the color of law (i.e., the misuse of power by a person possessing government authority). As noted by appellate court, punitive damages is constitutionally awarded under 42 U.S.C. Section Pursuant 1983 when defendant's conduct is shown motivated by vicious ill, corrupt motives and the intent involves reckless and callous indifference to the federally protected rights of others.,stating that this court must accept factual allegations in this complaint as true, when reviewing a pro se complaint under section pursuant 1915€(2).,This court must give it the benefit of a liberal construction. Haines v. Kerner, 404 U.S.*

519, 520 (1972). A "Liberal construction" means that if the essence of an allegation is discernible clear-cut definite. The district court should construe the plaintiffs complaint in a way that permits claims to be considered within the proper legal framework., By and through counsel plaintiff decided to motion The United States District Court For The Northern District Of Georgia Atlanta Division to overturn Clayton County Juvenile Court rulings and challenging Clayton County Juvenile Court lacks of jurisdiction, unlawfully trying the plaintiff under mere-suspicion allegations with no right to due process clause. Clayton County Department Of Family Children Service welfare employees Kayla Buie and Lakeidra Billingsley conspiracy "Racketeering Influenced Corrupt Organizations" crimes under the RICO with Clayton County Police Department Sector III Precinct to falsely arrest the plaintiff.

#### BACKGROUND

On May 13, 2022. Clayton County Department Of Family Children Service Kayla Buie was on the scene alongside 'with her supervisor Lakeidra Billingsley giving her misleading information via audio telephone on how to conspiracy to persuade, instruct and influence Clayton County Police Department Sector III Precinct to wrongfully, unlawfully and illegally conduct collaboration of destruction in random schemes and how to conceal the act as a cover up. Kayla Buie welfare employee

*came to plaintiffs home demanding entrance inside. Kayla Buie stated I will force my way in and take the rest of your children. The plaintiff stated do you have a search warrant? Kayla Buie states No I will go and get a search warrant.[Emphasis Added] where is the initial search warrant or removal order before Kayla Buie arrival?[Emphasis Added] If there was a probable cause of an immediate child-endangerment, a search warrant and a removal order would have been in place before Kayla Buie unjustifiable arrival. Kayla Buie came back to plaintiffs home with Clayton County Police Depart' Sector III Precinct but Kayla Buie never returned with a search warrant and or Juvenile Court removal order. Clayton County Police Department Sector III Precinct states we need to make entrance into your home. Plaintiff states Do you have a search warrant because Kayla Buie stated that she will return with a search warrant.[Emphasis Added] Clayton County Police Dept Sector III Precinct did not have a search warrant.[Emphasis Added] Plaintiff asserts her Fourth Amendment Right. "The Constitution through the Fourth Amendment 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". Searches and seizures inside a home, property or*

persons without a warrant are presumptively unreasonable. See. *Payton v. New York*, 445 U.S. 573 [1980]. *Clayton County Department Family Children Service and Clayton County Police Dept Sector III Precinct staged, plotted, and covered up their public corruption and schemes while fabricating a false charge of obstruction of an officer on plaintiff.* [Emphasis Added] Plaintiff did not obstruct any officer. See. *Rona Johnson Adeoye v. The State Of Georgia*. See. *Clayton County Internal Affairs Unit report*. *Clayton County Department Of Family Children Service and Clayton County Police Department Sector III Precinct unlawfully, illegally and wrongfully intrude, invaded, seized plaintiffs home, towed, and impounded plaintiffs vehicle without a search warrant.*, Plaintiff was not able to enter her home due to the *Clayton County Police Dept' Sector III Precinct seized the plaintiffs house and vehicle keys*. *Clayton County Dept' Family Children Service tells Clayton County Police Depart' Sector III Precinct to false arrest the mother and charge her with an obstruction so they can take the plaintiffs children that way so Kayla Buie welfare employee can state to Clayton County Juvenile Court that they need a reason to obtain an removal order that the mother was arrested on obstruction and the plaintiffs children became dependent and that the plaintiff child was with a gun*. *Clayton County Police Dept' Sector III Precinct stated to Clayton County Dept' Family Children Service that they don't want to get in involve*. *Clayton County*

*Dept' Family Children Service states let's enter inside plaintiff home without a search warrant and find a gun. Clayton County Police Dept' Sector III Precinct said neither the mother or her son was not in any procession of a gun and [you] Kayla Buie wants to get a court order on those grounds. Clayton County Police Depart' said we can use swat team shield technique maneuvers and break inside the plaintiffs house that way. Plaintiff and her children left their home for plaintiff to take her children to basketball practice located at 1837 McDonough Road Hampton, Georgia 30228. Clayton County Depart' Family Children Service and Clayton County Police Dept' Sector III Precinct awaits and position themselves across the street. As soon as plaintiff crosses the street in her vehicle with her children while parking and exiting the vehicle to walk her children inside for basketball practice. Clayton County Police Department Sector III Precinct and Clayton County Dept' Family Children Service Kayla Buie blocked plaintiffs vehicle in, ran in the Clayton County Recreation Center building as the mother and her children was leaving the building walking down the sidewalk to enter in their vehicle. Clayton County Police Dept' Sector III Precinct told plaintiff to put her hands behind her back while standing next to her children. Approximately, seven to eight police officers scuffled the plaintiff down to ground where her face hit the cement, twisted the plaintiffs fingers and wrist with pressure causing blood clots*

to the plaintiffs fingers with excessive force causing bodily harm. Plaintiff was laying on her back in handcuffs, Clayton County Police Dept' Sector III Precinct flipped the plaintiff over where her entire body and face landed on a brick of cement near a brush causing plaintiff a swollen arm, bleeding to the elbow, knees, fingers and ankles. Plaintiff stated that You're hurting me, that she did not do anything wrong. Plaintiff sustain agony pain and suffering from the police force and misconduct. Plaintiff daughter was crying trying to run to her mom saying don't hurt my mom., My mom did not do anything wrong. Let my mom go. Plaintiff daughter screams, I want my mom. Clayton County Police Dept' Sector III Precinct detain the plaintiffs minor daughter pushing her body against the brick building putting her face down to the ground in handcuffs and placed her in the back of the patrol car with no wrong doings to the plaintiffs daughter. Plaintiffs daughter just wanted to check up on her mother. There was no reason to detain a minor child for that reason and their misconduct cause of action excessive force abridges their procedures, policies, standards. Plaintiff was transported in confinement in handcuffs to the ambulance stretcher and went to southern regional hospital where plaintiff sustain her injuries due to police excessive force. Plaintiff did not receive medical care because Clayton County Police Dept' Sector III Precinct refused to take the handcuffs off of plaintiff wrist., then transported

*plaintiff to Clayton County Jail. There was no removal court order and one was not seen at the time of the incident. Clayton County Dept' Family Children Service uses the plaintiffs false arrest to obtain an removal order stating mother was arrested and plaintiff children became dependent, plaintiff son was with a gun, and so forth. [Emphasis Added] The biological mother was not charged for child neglect, child endangerment, truancy, and no procession of a gun. The plaintiff did not have any charges or warrants for her arrest. Even though the arrest was false, preplanned, and premeditated by Clayton County Dept' Family Children Service and Clayton County Police Dept' Sector III Precinct. Therefore, Clayton County Department Of Family Children Service held plaintiffs children captive unlawfully with no court order from May 13, 2022 that Friday until May 16, 2022 Monday.[Emphasis Added] How is their a removal order when their was no imminent child endangerment and their was no neglect or child abuse charges on the mother. As Clayton County Department Of Family Children Service employee Kayla Buie and Lakeidra Billingsley could not obtain Clayton County Juvenile Court order due to the Clayton County Juvenile Court hours of business was closed. On May 16, 2022, Clayton County Dept' Family Children Service obtain a Clayton County Juvenile Court Dependency Removal Order under judicial deception stating It is alleged that plaintiff son was in possession of a gun, and the*

*children became dependent due to the mothers arrest. [Emphasis Added] Clayton County Dept' Family Children Service failed to state that the plaintiffs child did not have a gun, the mother did not have a gun, and the mother's false arrest was staged, instructed, and plotted by Clayton County Dept' Family Children Service and Clayton County Police Dept' Sector III Precinct, that the plaintiff children did not become dependent due to mothers arrest because in the Clayton Clayton Internal Affairs Unit states that the plaintiffs arrest was false.[Emphasis Added] How can Clayton County Dept' Family Children Service say that the arrest was effective when it was defective fraud. A gun was not seen, not found nor in any Clayton County Police Dept' Sector III Precinct procession, custody or evidence room. Even after illegally barging and seizing the plaintiffs home and vehicle with no search warrant Clayton County Police Dept' Sector III Precinct said there was no concern of any child- endangerment or neglect and stated to Clayton County Dept' Family Children Service that the plaintiff will not be charge for any child neglect or endangerment. Clayton County Police Department Sector III Precinct had no legal justification to restrict the plaintiffs and her children freedom to leave, doing so constitutes a civil rights violation based on the Fourth Amendment. Selectively, the Amendment' to the United States Constitution prohibits officer's from conducting unreasonable searches or seizures. False imprisonment was accomplished by*

*violence., [The exercise of physical force to restrain with menace an express or implied threat of harm], with fraud and deceit[ because fraud and deceit cancels out the victim's consent]. Plaintiff, asserts four counts of reckless criminal kidnapping Georgia Code Section Pursuant U.S.C 16-5-40., abduction steals away another person without lawful authority and warrant less hold a person against their will, continued to lessens the risks of detection by deception, conceals, isolates and apprehends the plaintiff and her three children. The offense of kidnapping is declared to be a continuous offense, and venue over this matter is subject to where these defendants exercise outside their duty to dominion and control over the person of another. Plaintiff Rona Johnson Adeoye filed a complaint with Clayton County District Attorney Office for Clayton County Internal Affairs Unit to investigate Clayton County Police Sector III Precinct. Clayton County Captain W.M Kincaid office of professional standards commander [Internal Affairs/Accreditation & Policy]., Clayton County Internal Affairs Unit detectives has completed their investigation of the plaintiff's complaint and Clayton County Internal Affairs has disclosed sufficiently enough evidence against Clayton County Police Department Sector III Precinct police officers for failing to properly follow departmental of Clayton County rules and procedures for disciplinary actions to be taken against officers. The, morning on November 13,*

2023 at approximately 8:00 am. Rona Johnson Adeoye appeared before the Clayton County Superior Court as scheduled docket case file #20233CR00734-11 for the calendar hearing for the false accused alleged defendant Rona Johnson Adeoye vs The State Of Georgia appeared and announced her presence of the court Respectfully' saying Your Honor I'm here requesting for a Jury Trial. The Sixth Amendment states that in all criminal prosecutions, the accused criminal has the right to a trial by an impartial jury of the state and district in which the individual is allegedly accused of [or] has potentially committed a crime. Under Federal Law, Individuals have the right to be reasonably heard at any public proceedings. Defendants have the entitlement to make a statement they deem appropriate to the judge prior to the imposition of the final judgment without being condemned. It's in violation of due process for a state to enforce' a judgment against a party in a proceeding without having given the opportunity to be heard sometime before the final judgment is entered. Approximately Fourteen Clayton County Police Officers retaliated and maliciously attacked defendant with excessive force where she sustain bodily juries where a layer of skin lifted from plaintiffs left arm, swollen knee caps with bruises, cuts, and abrasions during the course of bending the subjects arms while in handcuffs, continued on dragging the plaintiff across the courtroom floors causing wood and carpet burns to the skin. Clayton County Police

*Officers stated in court get your taser and tase her. Plaintiff stated not to tase her while she was in confinement in handcuffs. See. Graham vs Conner, 490 U.S. 386, (1989) was a United States Supreme Court case in which the Court determined that an objective reasonableness standard should apply to a civilians claims that law enforcement officials used excessive force in the course of making an arrest. Plaintiff was in agony pain and was able to go to East Point Atlanta Medical for physical assault from Clayton County Police Officers misconduct and in its conclusions and findings Xray shows inflammation, swelling injuries to the left hands that cause fingers not to blend properly. Plaintiff was released on bond with no restrictions with false charges of obstruction and public disturbance while in the presence of the court and placed Rona Johnson Adeoye in handcuffs for requesting for a trial. Defendant was falsely arrested for ensuring her First Amendment Right To The Constitution under what is known as the compelled speech doctrine, free speech protections extend beyond the government from suppressing people from the freedom of expression from government interference in efforts to maintain the rights to the constitution to have a fair trial. The Fifth Amendment guarantees the right to a grand jury. The Sixth Amendment was also violated the right to present a compulsory process clause in its defense to counter cross exam witnesses and the right to testify. See Rock vs Arkansas, 483 U.S 44,*

51-53., The State appointed counsel defendant attorney Shein Render Lawfirm was not presence for the calender court called for Rona Johnson Adeoye vs The State Of Georgia. Therefore, Court proceedings are not subject to it's sufficiency to proceed for defendant whom was deem without a legal counsel at the alleged reported incident and should have not concluded an false arrest for verbally requesting for a trial without representation of counsel present. Clayton County Superior Court dismissed the obstruction charge in court then Clayton County Police Officer resentment against the alleged defendant and placed another false obstruction charge on the individual while in court, for the other case that was a false conspiracy charge which is considerably the Double Jeopardy Clause. See. *Denezpi v. United States* No. 20-7622 10th Circuit (2002)., See. *State v. Rowlands*. The double Jeopardy Clause in the Fifth Amendment to the United States Constitution prohibits anyone from being prosecuted twice for substantially the same crime. The double jeopardy clause is guarantee against being twice put to trial for the same offense; a successive prosecution is a distinct wrong because it forces an accused to endure the personal strain, public embarrassment, and expense of a criminal trial more than once for the same offense, where the State makes a repeated attempts to convict an individual for an alleged offense after being acquitted, convicted, and/or punished for the same offense. Restricting the

*government from retaliation from bringing excessively harsh false charges against accused defendant that was innocent and denying the plaintiff Rona Johnson Adeoye the right to a jury trial but rather arrested her in court with bodily harm by police misconduct. Clayton County Superior Court Judge did not charge defendant with any contempt of court when she asserted her Constitutional right to have a trial. Clayton County Police Dept' Sector Precinct taken upon themselves to retaliate against her by falsely charging the individual with excessive force.*

*Plaintiff was already in the Clayton County Superior Court on a police brutality case which was dismissed. Furthermore, Clayton County Department Of Family Children Service employee's Kayla Buie and Billingsley persuaded Clayton County Police Department Sector III Precinct officers on a visual tape recording being seen directing, and hindering the law with assisting unlawful acts to falsely arrest, charge and falsely imprisonment the plaintiff just to take plaintiff's three children was in violation of statutory and common law duties. Respondeat Superior embodies the general rule that an employer the county, state is responsible for the negligent acts or omissions of its employees resulting in acting under the color of law. Defendants had reasonable opportunities to prevent the violation from engaging in conspiracy of plaintiff constitutional rights., but failed to do so.*

*Georgia Code Section Pursuant 16-5-41, Article 3 Kidnapping, false imprisonment,*

*and related offenses commits the offense when in violation of the personal liberty of another, arrests, confines or [and] detains such person without legal authority. "Custody" is synonymous with "imprisonment" which is detention of any person contrary unlawfully hindered that person's free will in trapped in confinement and in handcuffs. Force a[n] illegal arrests and detain plaintiff and her three children for any length of time is a criminal offense and falls under malicious and frivolous tort for which an action for damages will sustain justification for Standard Form 95 is used to present claims against the United States under the federal tort claims act [FTCA] for personal injuries, emotional distress by intentional infliction caused By a Federal, County, and State employees negligence and wrongful act of omission of random recurring acts within the scope of employee's employment and by their department actors under false arrest, abusive litigation, malicious prosecution and false imprisonment chapter 7 by 6 Tort Code, Georgia Code Chapter 6 fraud and deceit., how fraud acts of silence. Georgia Code Chapter 5 Protects from libel and slander. This includes defining libel and slander, the right of action for malicious use of privilege and the admissibility of evidence and defamation actions against the plaintiff. This brings forth all administrative claims arising out of the government's discretionary functions, claims arising out of intentional torts and claims out of*

*governments constitutional violations. Clayton County Juvenile Court Associate Judge Rosalind Wakins and Associate Judge Christopher Walker shall be investigated for the conspiracy to judicial violations and acted under the color of law, ignored evidence and apparently made pre- determined rulings based on hearsay allegations with Clayton County Department Of Family Children Service recommendations. Plaintiff and her three children have been affected by the [No Due Process Procedures]. Defendants "knowingly accept[ed] the benefits derived from unconstitutional behavior. These color of law' actors has acted with the help of or in concert with [T]he state officials. It's findings result[ed] from State exercise of coercive power., Clayton County Juvenile Court Judge Rosalind Wakins is not longer a judicial judge for Clayton County Juvenile Court. Several other employees from the department has also resigned., Plaintiff asserts further from this Court that defendants do not flee or to allude without informing the notice of the court. Plaintiff claims that defendants adopted a policy of [inadequate training], to train its employees to carry out their duties. Failed to [inadequate supervision] of its department by violating plaintiff deprivation of rights [A Federal Right]. Defendants acted in most exclusive manner in Section Pursuant Code 16-14-4., Racketeering Influenced Corrupt Organizations prohibited activities., [a] it shall be unlawful for any person, through a pattern of racketeering activity or proceeds*

derived, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise of any nature. Clayton County Juvenile Court Associate Judge Rosalind Wakins and Associate Judge Christopher Walker has corruptly [a]n illegal, and unlawful created a document of [a]n adjudication dependency case in which is considerable a void judgment order which does not have the legal jurisdiction of authority or effect. Several Clayton County Police Officers aggressively taken plaintiffs autistic son out from the presence of his mothers home hitting his head on the top of the garage door when plaintiffs son passed out in the back of the Clayton County patrol vehicle. Clayton County ambulance and firefighters department arrived at the scene. Plaintiff, son Abdulay Daniel Boubacar age 15 was in emotional distress by the wrongdoings conducted by Clayton County Police officers use of excessive unreasonable force that could have been prevented during the unlawful removal from his mothers home. There was no search warrant present for several law enforcements to force entrance into plaintiffs garage home to remove her autistic son Abdulay Daniel Boubacar and disregarded his disability by being very aggressive towards the child and taken him unlawfully into custody for a charge of a procession of a gun that he did not have. During the discovery of the unlawful removal by several approximately [three] Clayton County Police Department Sector III Precinct officers force hands on plaintiff inside her home

*without any validation of any search warrant to invade and intrusion entrance without permission. The Fourth Amendment, protects two fundamental liberty interests: The right to privacy and the right to freedom from arbitrary invasion. This search occurs when government employee or agent violates a reasonable expectation of privacy. Law enforcement personnel seized and use physical force to restrain the person and not allow them to leave constitutes violations of the Fourth Amendment. *Kyllo v. United States*. Apparently, The appellate courts recognizes the exclusionary rule to deter police officers and other government agents from abusing constitutional rights. The Fourth Amendment, fundamentally, is concerned with privacy. A person's space- either in terms of possessions or body- cannot be intruded upon without justification. [A]s stated in the amendment, a search or seizure must not be "unreasonable". For example, in *Weeks v. United States* (1914). The Supreme Court unanimously asserted that a person's possessions could not be seized from a private residence unless the police has a warrant. An arrest of a person preferably [plaintiff] can be considered a seizure or intrusion upon that person's body similar to case [1989] *Graham v. Connor*, [1968]*Terry v. Ohio*.,[1985] *New Jersey v. T.L.O.*, [a]nd [2014] *Riley v. California*. Plaintiff argue that courts should interpret the Fourth Amendment's protections and Civil Rights violations by looking into the "General Law". Case plans do not*

require the outline of neglect., due to the neglect was not ruled on the basis of any criminal matter. There was no police report for the alleged allegations. Clayton County Department Of Family Children Service recommend that Clayton County Juvenile Court Associate Judge Rosalind Wakins' fabricated [a]n order for plaintiff to do Clayton County Department Of Family Children Service case plan for parenting classes, psychological evaluation and allow Clayton County Department Of Family Children Service employee Kayla Buie, Clayton County Sheriff and Clayton County Police Department Sector III Precinct officers to assist Clayton County Department Of Family Children Service in another invasion entrance under a warrantless search in violation of search of seizures Georgia Code Section Pursuant 17-5-30 into plaintiffs Rona Johnson Adeoye house for a illegal safety inspection with no search warrant. In The State Of Georgia, and to the State Constitution provides protection against unreasonable searches and seizures, similar to the Fourth Amendment of the U.S. Constitution Article I, Section I, Paragraph XIII of the Georgia Constitution states that "The right of the people to be secure in their persons, houses, papers, and effects against unreasonable searches and seizures shall not be violated. Plaintiffs' home has basic amenities such as electricity, running water, heating, cooling system, food, clothing, bicycles, virtual laptops and etc. Plaintiffs three children have their own room. During the

*unlawful search of seizure invasion of the plaintiffs home and vehicle. There was no known sources of any “safety” concerns of any weapons, no forms of abuse in the home. Clayton County Juvenile Court Associate Judge “Rosalind Wakins” coercion the plaintiff Rona Johnson Adeoye with several contempt of court with humiliation implied with voice amplitude and applied strict consequences to the plaintiff pre-assume guilty with no due process clause nor the right to contest and counter cross evidence to the false allegations. Clayton County Juvenile Court Associate Judge “Rosalind Wakins” states in an “Adjudication Dependency” document, if plaintiff does not give Clayton County Department Of Family Children Service plaintiffs insurance card for psychological services for Clayton County Department Of Family Children Service employees and their providers would be in contempt of court. These organization are involved and contributed in multiple interest which violates a “conflict of interest” serving one interest could involve working against plaintiff when using Clayton County Department Of Family Children Service providers., Typically, this relates to an individual or organization adversely affect a duty owed to making decisions for the opposite component “plaintiffs” in this conflict of interest which creates a risk that a decision will be unduly influenced by a secondary interest and consequently constitutes to obtain for part taking sides on grounds for a “conflict of interest” which should be void*

*and dismissed and should not be gainfully used on plaintiff in Clayton County Juvenile Court. Clayton County Department Of Family Children Service could not use their own providers against the plaintiff in which the plaintiff should not witness against themselves in any self-incrimination with Clayton County Department of Family Children Service preferred providers., Under, the Fifth Amendment of The Constitution Of The United States Of America- All Americans have the right to not be compelled to be a witness against themselves preferably in Clayton County Juvenile Court (under Clayton County Department Of Family Children Service suggestions)., regularly order plaintiff to cooperate with Cps and to sign releases of private medical and psychological information which, [A]lso was forced tactics of coercion of consent by plaintiff which violates the HIPAA' and Privacy law that the plaintiff has the right not to release any medical record(s). Plaintiffs record's shall be confidential with plaintiff's consent and permission. Plaintiffs do not give any permission for anyone to use plaintiff's insurance information for any reason which protects plaintiff from unauthorized access or disclosure of information. Clayton County Juvenile Court Associate Judge Rosalind Wakins"stated on a adjudication disposition dependency document that the plaintiff Rona Johnson Adeoye would be in several contempt of court formally*

*a [forced technique maneuver] if the information requested by the court was not submitted to Clayton County Department Of Family Children Service and if plaintiff' did not update her address. There shall be no random reason and coercion attacks under lawless bribery to misconstrue information and outrageously manipulate plaintiff with contempt of court an adult into Clayton County Juvenile Court under unknown forces to apply on plaintiff. Clayton County Juvenile Court Associate Judge Rosalind Wakins continued to coercion the plaintiff and wrongfully suspended visitation rights from plaintiff and plaintiffs three children for several months from May 2022 thru August 2022. Accordingly, to the laws of the Constitution', Plaintiffs rights of liberty and to plaintiff three children are not to be unlawfully deprived from their mother as considered a fundamental right in which plaintiff rights were intentionally infringed. Plaintiffs rights to freely parent her three children without incrimination of one's self rights and not pose sanctions, that the Supreme Court jurisprudence implies children and families have constitutional right to family relationships free from unwarranted state interference- in other words, a right to family integrity. The U.S Supreme Court and Federal Court rulings highlighted and recognizes parents' constitutional rights to the care, custody and control to their children. Plaintiff right to family integrity claims that the plaintiff rights was violated by substantive and due process rights*

*under the Fourteenth Amendment by depriving the plaintiff the fundamental liberty interests., the right to family integrity. See. Bivens v. Six Unknown Name Agents, 203 U.S 388 (1971), in which the Supreme Court held that a violation of one's Fourth Amendment rights by federal officers can give rise to a federal cause of action for damages for unlawful search and seizures. Clayton County Department Of Family Children Service "color of law" actors unlawfully, illegally and wrongfully removed plaintiffs' three children's clothing and items. Clayton County Juvenile Court does not have authority to remove unlawfully, illegally and wrongfully seized the adult home when there was no search warrant to do so. These defendants abridged, abused, concealed conspiracy to violate their oath of office Title -16 Crimes and offenses, Chapter 10- Offenses against public Administration, Article 1- Abuse of government office. Section Pursuant 16-10-1., violation of oath by public officer by excessively abusing the government power and position by acting in the image of deprivation of rights under the color of law 18. U.S.C. Section Pursuant 242. This provision makes it a crime for defendants acting under the deceptive color of law to willfully deprive the plaintiff the right and privilege protected by the Constitution., See Reynolds v. State, 3334 Ga. App. 496... See Gaskins v. State, 318 Georgia. App. 8 (2012). Georgia. App. 496 (2015).The Fourth Amendment "The Right Of The People To Be Secure... Against*

*Unreasonable Searches And Seizures Shall Not Be Violated., And Georgia Constitution Article I, Sec I, Paragraph XII. No warrant shall be issued, 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. There was not a valid search warrant present, it was formally conducted secretly and anonymously.,In regards to Interference with custody under O.C.G.A Section Pursuant 16-5-45, under an unlawful removal. See. Hurlman v. Rice (2nd Circuit. 1991)., [warrantless seizure of a child]. Clayton County Juvenile Court Section Pursuant 16-10-20 defendants knowingly and willfully schemes, alter, conceal, cover up, and create several documents under a false adjudication disposition dependency document and formed a corrupt conspiracy with Clayton County Department Of Family Children Service employees formed a conspiracy that has been altered and contains materials of false deformation facts that are fictitious and fraudulent which violates the oath of office. Clayton County Department Of Family Children Serv. has routinely violated and intentionally disregarded all the civil and constitutional rights of the litigant. This case audits shows Clayton County Juvenile Court Associate Judge Rosalind Wakins intentionally ignored evidence and apparently made pre-determined rulings based on forming an unlawful*

*“alliance” with Clayton County Department Of Family Children Service by engaging in Title 16 Crimes And Offenses, Chapter 14 Racketeering Influenced And Corrupt Organizations. Clayton County Department Of Family Children Service welfare employees submit misrepresentation of misleading facts to exist and conclude a false removal report to Clayton County Juvenile Court. Critics misconstrue information to support their false claims and therefore to present an entirely a misleading case. Clayton County Department Of Family Children Service and employees consciously misrepresent facts and selectively engage in systematic distortions and deliberately make efforts to deceive the justice system to promote their own personal idea under the guise of vigilance by concealing material facts.*

*In this case Clayton County Department Of Family Children Service and Clayton County Juvenile Court has intentionally violated Civil Rights through a [Kangaroo Court] proceeding ruled outside of Justice. Clayton County Department Of Family Children Service employees who intentionally “fail to follow” the rules, protocols and procedures are purposely excessive. Clayton County Department Of Family Children Service, Clayton County Juvenile Court, and Clayton County Police Department Sector III Precinct acted as “tortfeasors” in defamation in violations to Title 51- Torts Chapter 5- Libel and Slander Section Pursuant 51-5-1. Libel Defined; Publication Prerequisite to Recovery to the plaintiff reputation. Defendants libel a*

*false and malicious defamation of the plaintiff. Defendants publicly expressed in print, writing, orally uttered tending to injure the reputation of the plaintiff Rona Johnson Adeoye and exposing the plaintiff to public hatred, contempt, and ridicule. Plaintiff alleges that the Clayton County Department Of Family Children Service falsified court documents and paperwork to state government and to the Clayton County Juvenile Court with false accusations against the plaintiff and her three children. Defendant(s) acted as a "tortfeasors"throughout its investigation; consistently "attacked and defamed the character and standing of plaintiff and her three children]. In the community". Strung plaintiff and her three children along' for two years in order to spend up required amounts of time not to return "reunification" with plaintiff and her children. The plaintiff have parental rights and is mandatory to be able to parent, to direct the upbringing, education and the care of their children. Defendants interference with the parent-child relationship in violation of the Fourteenth Amendment be brought in this procedural due process claim and substantive due process claim. See City Of Fontana, 818 F.2d at 1419-20. This procedural due claim arises when the state interferes with the parent-child relationship the purpose of furthering a unjustifiable state interest "for the purpose of oppression."Id. (quoting Daniels v. Williams, 474 U.S. 327, 331 (1986).*

*For instance, “the state has no legitimate interest in interfering with this liberty interest through the use of excessive force by police officers.”* *Id.* At 1419-20.

*Defendants engaged in standard for procedural due process violation when state removes a child from a parent’ care. For such claims, “The Fourteenth Amendment guarantees that parents will not be separated from their children without due process. Even if the removal is pursuant to a court order, the right is violated when the court order was obtained through judicial deception. Thus the plaintiff alleges a misrepresentation of omission, made deliberately with reckless disregard of the truth, that was material to judicial deception.”* *David v. Kaulukukui*, 38 F.4th 792 (9th Cir. 2022). *The mere threat of separation” is the Fourteenth Amendment claim” based on a minor being separated from their biological mother.* *Dees v. County Of San Diego*, 960 F.3d 1145, 1152 (9th Cir. 2020). Defendants impermissible interference with familial association arises when a state official harms a parent and child in a manner that shocks the conscience. *Porter v. Osborn*, 546 F.3d 1131, 1137 (9th Cir. 2008). *Official’s conduct that ‘shocks the conscience is cognizable as a due process violation.* *Id.* (quoting *County. Of Sacramento v. Lewis*, 523 U.S. 833,846 (1998)). Plaintiff contends that all plaintiffs Amendment Rights has lost its constitution remedy by these defendants before due process clause has been established. Plaintiffs, children requested to Clayton

*County Juvenile Court that the plaintiffs children wanted to go home to their biological mother. Plaintiff, assert that both Clayton County Juvenile Court Associate Judge Rosalind Wakins and Associate Judge Christopher Walker conspiracy in the “adjudication disposition dependency” case has been mislead by Clayton County Department Of Family Children Service recommendations. Courts’ are constituted by authority and they cannot go beyond that power delegated to them. Clayton County Juvenile Court acted beyond that authority, and certainly in contravention of it, their judgments and orders are regarded as nullities; but simply void, and this even prior to reversal.” See.. Williamson v. Berry, 8 HOW. 945,540, 12 L. Ed. 1170, 1189 (1850). When rule providing for such relief from void judgments is applicable, relief is not discretionary matter, but is Mandatory’, Orner. V. Shalala, 30 F.3d 1307 (Cob. 1994). Judgment is void when Clayton County Juvenile Court lacked jurisdiction of the subject matter, and parties frequently conducted conspiracy orders that is missing elements and inconsistent with due process, Fed. Rules Civ. Proc., Rule 60(b)(4), 28 U.S.C.A., ... U.S.C.A. Constitution Amendment. 5- Klugh v. U.S., 620 F.Supp.892 (D.S.C. 1985). Clayton County Department Of Family Children Service defrauded the system under false allegations against the plaintiff which was not tried as a crime. Clayton County*

*Department Of family Children Service interfere with parental rights because Clayton County Department Of Family Children Service lacked objectively reasonable grounds to believe that the plaintiffs children has been abused or was an imminent danger after law enforcements considering that there was no posted harm for the children after illegally, wrongfully, and unlawfully barged into the plaintiffs home and vehicle without any search warrant to do so., Clayton County Juvenile Court lacks jurisdiction and it could not hear the case and it must dismiss it due to improper venue defectives service of due process, that the adult mother age 36 could not abide by Clayton County Juvenile Court under an unlawful and fabricated a forced order for an adult considerable the plaintiff to complete Clayton County Department Family Children Service recommendations., as Clayton County Juvenile Court does not hear nor have jurisdiction over adult' cases. Thusfore, 2020 Georgia Code Title 9- Civil Practice Chapter 12 Verdict and Judgment, Article 1 General Provisions Section Pursuant 9-12-16. Validity of judgment when Clayton County Juvenile Court does not have jurisdiction on allegations on an adult. Void judgment is attacked at anytime and anywhere because the judgment is absolutely void. See Parker v. Bond, 47 Ga. App. 318, 170 S.E. 331 (1933)., void judgment as its missing elements of the case. Clayton County Police Department Sector III did not have probable cause for any false*

arrest., See. Internal affair unit report. See. Littlepage v. Dukes Civil action No. 4:17-CV-00041-JHM William Dukes Jr. A former sergeant with the Providence, Kentucky police department was found guilty in federal court on one count of willfully arresting a citizen without probable cause and was investigated by the Louisville Division of the Federal Bureau of investigation and was prosecuted by Assistant United States Attorney Seth Hancock of the Western District of Kentucky, and trial Attorney Zachary Dembo. Clayton County Juvenile Court Judge Rosalind Watkins abuse of official power and improper use of state employees functions of duties. See Section Pursuant U.S.C Georgia Code Title 45. Public officers and Employees 45-10-90 of authority and engage in misconduct practices.

Clayton County Department Of Family Children Service and has placed plaintiffs son on several behavioral medications without permission, consent or knowledge from his mother Rona Johnson Adeoye. Plaintiff disagree and disapprove of any behavioral health seizure medication Trileptal, Clonidine and Abilify to be given to him to sedate him in any way. Plaintiff son has no history of taking any medication while he was with his biological mother and Abdulay Daniel Boubacar has no medical history of being diagnosed with any seizures. County Department Of Family Children Service welfare employee(s) disregarded all communications with

plaintiff and her son because plaintiffs children were notifying there mother of types of abuse that they was experiencing and how numerous incidents was not being documented or reported Subsequently plaintiff Periodically random placements have physically, emotionally, verbally abused plaintiffs three children but was not reported by the appropriate authorities. Plaintiff's voice recorded second son Akeem Adewale Adeoye Jr. giving a complaint to Clayton County Department Of Family Children Service welfare employee Micheal Scott that plaintiff's son was being physically abused by his former placement. Plaintiffs son said he was getting slapped and punched everyday in his sleep., that he felt unsafe and how the physical abuse continued and how plaintiffs son stated that he wants to go home to mom. Plaintiff request that plaintiffs son be removed from abusive placement and plaintiff motion emergency removal to Clayton County Juvenile Court Judge Rosalind Wakins for the return of plaintiffs children back home to plaintiff.Clayton County Juvenile Court Associate Judge Rosalind Wakins denied plaintiff's motion stating that plaintiff did not complete the case plan. This strict case plan is coercion and is under a harsh plan that did not allow the plaintiff to contest any allegations and the plaintiff committed no crime against her three children to go under any case plan. Plaintiff asserts that dues process rights was violated in Clayton County Juvenile Court[1] conducting an

*inadequate, biased investigation with Clayton County Dept Family Children Service;[2] providing biased training to the hearing panel;[3] denying plaintiff the right to conduct discovery;[4] Right to effective cross-examination;[5] denying the right to effective assistance of an unbiased attorney;[6] preventing plaintiff from presenting exculpatory expert testimony at the hearing;[7] failing to disclose exculpatory evidence relating to the timing of the alleged allegations.[8]*

*Conducted proceeding under judicial deception.[8] violated the oath of office swears an allegiance to uphold the Constitution malfeasance commission of an unlawful acts. Plaintiff refiled another motion for Clayton County Juvenile Court Chief Judge Deitra-Burney-Bulter to intercede on the inconsiderate ruling by Clayton County Juvenile Court. Clayton County Juvenile Court Associate Judge Rosalind Wakins and three Clayton County Department Of Juvenile Court clerks conspiracy to deny plaintiffs motions to non-existence and pretend to impersonate Clayton County Juvenile Court Chief Judge Deitra-Burney- Bulter not to allow to hear this case and conspiracy to avoid a scheduled calendar for Clayton County Juvenile Court Chief Judge Deitra-Burney-Bulter to review a fabricated Adjudication Dependency Case. Clayton County Department Of Family Children Service employee Michael Scott stated that plaintiffs son was not going to be*

*removed from former placement due to the plaintiffs child's stated he was being physical abuse. At this moment plaintiffs son Akeem Adewale Adeoye Jr. continued to be in that placement. Plaintiff never heard from her son again and do not know the status of plaintiffs son well-being. Plaintiffs voice recorded and has text messages that plaintiffs daughter Salimatou Amiya Boubacar stated that she has been starving in her current placement. Plaintiffs daughter fell sick with the lack of food when plaintiffs daughter was saying her side was hurting in the foster home placement and bed bugs were biting through the plaintiff's daughter's skin. Plaintiff was able to buy groceries for her daughter and buy things for her daughter to get well. Clayton County Department Of Family Children Service placements have left plaintiffs' minor daughter home alone with no supervision. There is video tape recording shows at Skate Zone' 6766 Mount Zion Blvd Morrow, Georgia 30260 that the plaintiffs daughter Salimatou Amiya Boubcar was booked a uber unknown vehicle transport with no supervision by Clayton County Department Of Family Children Service. The forgoing actions and inactions of Clayton County Department Of Family Children Service an all others in concert with them constitutes several failures to exercise an affirmative duty to protect the welfare of all plaintiffs and class members, which is a substantial factor leading to, and proximate cause of the violation of the constitutionally protected*

*liberty and privacy interests of all of the plaintiff and class members. The forgoing actions and inactions of Clayton County Department Of Family Children Service Defendants' constitute a improper policy, pattern, practice and custom that is inconsistent with the exercise of reasonable professional judgment and amounts to deliberate indifference to the serious and constitutional protected rights, liberty and privacy interests of all plaintiffs and class members. [A]s a result, of plaintiff have been deprived of the substantive due process rights conferred to plaintiff. Defendants have arbitrarily and capriciously deprive all fundamental rights that sets forth the rights of the constitution law of the land. Defendant Candice Broce is the Commissioner of the Georgia Department Of Human Services ("DHS"). See O.C.G.A Section Pursuant 49-2-1., As Commissioner of DHS, Defendant Broce is a division of DHS. Department Of Human Service is the agency responsible for the work of Clayton County Department Of Family Children Service for their improper policy and practices under color of law. In its findings that defendants has acted with the help of or concert with state officials actions "result[ed] from the state exercise with coercive power, duress, threats, and psychological pressure . Defendants act beyond the bounds of lawful authority, but in such a manner that the unlawful acts were done while the official was purporting and pretending to*

*act in the performance of their official duties. Plaintiff has her children voice recordings to exhibit into evidence as well Clayton County Juvenile Court zoom hearings. Clayton County Juvenile Court Associate Judge Rosalind Wakins violated the oath of office and not recorded unethical proceedings was detrimental, frequently coercion the plaintiff on a zoom hearing and in person court hearing that if plaintiffs visit daughter again without supervision would be in contempt of court. It's been years now that plaintiff has not seen nor heard from her daughter or plaintiffs other two children. Clayton County Juvenile Court Judge Rosalind Wakins deny plaintiff the right to freedom of speech if plaintiff presented her case in Clayton County Juvenile Court that Judge Rosalind Wakins states that she will personally arrest Rona Johnson Adeoye if she speaks on behalf of herself. Clayton County Juvenile Court has conducted all proceedings with no form of a state appointed attorney for the plaintiff. Clayton County Juvenile Court Associate Judge Rosalind Wakins objected all plaintiffs' motions when Plaintiff notified in a motion to exhibit into evidence of visual pictures of violations of improper procedures by Clayton County Department Of Family Children Service not investigating foster home unfit placement. Plaintiff daughter stated to her mom in a voice recorded that her mom motions will be objected because Clayton County Juvenile Court Associate Rosalind Wakins do not want to recognize the wrongdoings by Clayton*

*County Department Of Family Children Service because all defendants are covering up random schemes of conspiracy of negligence. Plaintiff daughter Salimatou Amiya Boubacar stated that another foster child was without a bed and slept on the floor. Later the foster child ran away from placement. The lack of safety and security and safety measurements on Clayton County Department Of Family Children Service placements are not being addressed nor is it's placements are being checked for security standards which require state laws to protect children from hazardous situations and documenting such incidents in which defendants failed to do. These random acts of cruel incidents are being held hidden from the State Office Of Commissioner Of Georgia intentionally. As a result, of Clayton County Department Family Children Service failure to appropriately screen, monitor and investigate these unsafe placements. Plaintiff three children continued to be physically, emotional and verbally abused while in Clayton County Department placements. Plaintiffs daughter Salimatou Boubacar was in an placement that the biological mother [Plaintiff] complained about several times reports of hazardous high amounts of unbreathable toxic marijuana smoking, lack of food and medical care. Plaintiff's daughter Salimatou Boubacar also experienced traumatizing effects of experiencing one of the foster children get*

*molested by the male foster parent. and this current foster home is under an investigation and is currently in court. Plaintiff asserts that Rona Johnson Adeoye has brought this complaint to the attention of Clayton County Department Of Family Service director Denieka Manning states would investigate the wrongful procedures, policies, regulations. The unlawful removal conducted by the Clayton County Department Of Family Children Service welfare employees. No investigation was completed. Plaintiff, seeks a response by Clayton County Department Of Family Children Service under a writ of administrative mandate' [Mandamus] and subpoena each wrongful personnel who act under "color of law" beyond the bounds of these unlawful acts. Defendants abuse of power under guise of illegal authority. Clayton County Department Of Family Children Service maliciously knew they were giving false information, testimony and had a reckless way to disregard the truth which regularly denies justice to the plaintiff and plaintiff's three children of their egregious misconduct. All state, local actors be indemnified to compensate for the return of the plaintiffs three children without delay. Plaintiffs' three children stated that they want to return home to their biological Mother Rona Johnson Adeoye. Clayton County Department Of Family Children Service continued to apprehend and infringe on the plaintiffs rights to her children, depriving plaintiff parental rights and the fundamental liberty right*

*without state interference. Clayton County Juvenile Court Associate Judge Rosalind Wakins was pernicious and consumed destructive ways under a false adjudication disposition dependency hearing when the actual facts the plaintiff's three children did not become dependent because the plaintiff was under a false arrest.*

*County Department Of Family Children Service, Clayton County Police Department Sector III Precinct and Clayton County Juvenile Court in a hideous effort to cover up the true evidence. Clayton County Department Of Family Children Service continued to withholding and requirements that visits be supervised was violation of substantive due process when plaintiff poses no harm to any of plaintiffs three children. Clayton County Department Of Family Children Service intensive case plans was coerced because placement and supervision of visits were not justified and violated the plaintiffs and plaintiffs three children of fundamental rights.*

*Clayton County Department Of Family Children Services and Clayton County Juvenile Associate Judge Rosalind Wakins" infringe on plaintiffs parental rights.*

*Defendants' deprivation infringement on custody will be considered coercive and duress. Clayton County Department Of Family Children Service inaccurately misrepresented law and facts prior to deprivation and was no legal justification for a threaten of unlawful of removal of plaintiffs three children when there poses no*

*safety concern. Clayton County Department Of Family Children Service interferes with plaintiffs parental rights because Clayton County Department Of Family Children Service lacked objectively reasonable grounds to believe that plaintiffs children has been abused or was in imminent danger of abuse and has deny all plaintiffs parental rights to parent her children accordingly without being deprived that fundamental right without county or state interference. This requisite standard emergency removals during a maltreatment investigations. Therefore, this means that without adequate sufficient evidence to actual justify an emergency removal, ultimatums like the one in Croft' are coercive; Subsequent cases in the "Circuit District Courts., However, interpret the "Croft" holding is a mean "absent any Procedural safeguards" case plans are coercive practice which violates families' "Due Process Clause Rights" not to be heard but rather forced upon one's rights to abide by presumptions terms and "enmeshed" in situations with unequal bargaining power. Clayton County Department Of Family Children Service coercive an unlawful ultimatum with "no due process rights which violates the plaintiffs rights to be restricted. Adults cases are not to be secretly tried or heard consequently in Clayton County Juvenile Court as it only hears Juvenile delinquent cases and charges, not for adults to abide by unlawful conspiracy and fabricated orders or to enforce a case plan upon plaintiff in an unnecessary strict*

*case plan upon families that does not characterize the outline of the circumstances that violated plaintiffs liberty rights completely intact. Plaintiffs, ability to visit or to be near her three children was unequally impacted, limited and there was no visitation rights at all. Plaintiff seeks declaratory relief findings that the implementation of the case plan was unconstitutional. Case plans are not arbitrarily implemented without a recourse for review, nullification, or modification by an independent administrative. Clayton County Juvenile Court Associate Judge Rosalind Wakins uses Clayton County Department Of Family Children Service case recommendations. Plaintiff, states that the case plans is a fabricated plan. [A] case plan that the plaintiff could not agree to because the alleged allegations are not true but were rather induced by coercion and duress. Clayton County Department Of family Children Service accused plaintiff under false allegations which are basis of hear-say. Plaintiff is allowed the right to the Sixth Amendment to not be compelled before a trial or be pre-accused with no due process clause in a Clayton County Juvenile Court and sanctioned an adult which could not be tried in a Clayton County Juvenile Court, is for adolescents. Plaintiff is under false allegations in a minor Juvenile court when when plaintiff committed no crime against her three children. Subsequently, Clayton County*

*Superior Court did pose any probation, any charges regarding plaintiffs three children. Therefore, Clayton County Juvenile Court Associate Judge "Rosalind Wakins" and Associate Judge Christopher Walker should not unconstitutionally accused an adult which Clayton county Juvenile Court has no jurisdiction to try plaintiff. Plaintiff, shall not answer to or go under any case plan to witness against themselves with no due process clause. Plaintiff, asserts of civilian of arrest, and federal indictment warrants on all Clayton County Department Of Family Children Service employees and all color of law' state actors that interacted with the foul defamation against the plaintiff along with Clayton County Police Department Sector III Precinct officers whom taken part in this public corruption which whom Clayton County Juvenile Court Associate Judge Rosalind Wakins went along with three clerk Theresa Thornton, Tara Barfield, and Telene Durggins prolonged extensive court dates, repeatedly contrived deliberately untrue facts by creating negative connotations and implies not genuine or authentic with ex parte communication with Clayton County Department Of Family Children Service attorney Lauraill Williams in which whom had Clayton County Department Of Family Children Service agency notarized Clayton County Juvenile documents. Plaintiff has voice recording that this occurred. Clayton County Department Of Family Children Service clerk's office stated on a voice recorded that they can*

choose Clayton County Department Of Family Children Service notary to notarized there documents on a false adjudication disposition dependency. Therefore, Clayton County Juvenile Court realize that using Clayton County Department Of Family Children Service notary to notarized Clayton County Juvenile Court documents were of conflict of interest and are prohibited. Clayton County Juvenile Court change notary as soon as plaintiff mention that it was ex-parte communication and using its notary from the same in which was fabricating deformation against the plaintiff in sharing political interest in there same tactics. Defendants are In active conspiracy with Racketeering Influenced Corrupt Organizations crimes under RICO Section Pursuant U.S.C Code 16-4-4 with Corrupt Organizations and conflict of interest with random departments of self-gain protection and to corrupt every crime with their intentions to bargain and self sabotage one's favor. To partnership and gain control to protect their image from being exposed by public corruption and it became a [Kangaroo Court], [impromptu Court],[mocked court] ruled outside of justice in a Clayton County Juvenile Court setting obstructed the justice system with random schemes and series of events that was unlawfully organized. The principles of law and justice are disregarded perverted and parodied characterized by unauthorized and irregular procedures

(esp). It ignores and does not recognize standards of law and justice. It carries little to no official standing in the territory in which it resides and is typically covered ad hoc. Clayton County Juvenile Court ignores due process and come to predetermined conclusions In these terms may also apply to Clayton County Juvenile Court held by legitimate judicial authority which intentionally disregards the court's legal or ethical obligations. Clayton County Juvenile Court a Kangaroo Court; It's an unlawful false court that does not follow the legal standards agreed to and by the community. In this case the outcome was tried in such a court that was already decided long before any proceedings started. Clayton County Juvenile Court during its proceedings attempts to imitate a unfair trial or a hearing without the usual due process safeguards including the right to call witnesses, the right to confront your accuser, and the right to a hearing before a fair and impartial judge, the right to contest to any allegations. In which the law hears before it condemns which proceeds not arbitrarily or capriciously and sanctioning the plaintiff without due process under false allegations that justifies untrue facts held by Clayton County Juvenile Court but whether fabricated in a form of a mocked court that unjustified its actions for any justice but only by the sake of themselves. Plaintiff moves this case to The United States District Court For The Northern District Of Georgia Atlanta Division' due to the unethical procedures by each department

who failed to recognize justice to the plaintiff and to plaintiffs children. Plaintiff do not have any criminal history regarding plaintiffs' three children. There are no findings of any criminal background database search for anything regarding plaintiffs children or any charges pertaining to plaintiffs children. Plaintiff did not go to jail for her three children. There should not be any reason why plaintiff three children should remain in the care of the Clayton County Family Children Service under a unlawful, illegal, wrongful removal when plaintiffs poses any harm to plaintiffs children. Clayton County Juvenile Court clerks employees and Clayton County Department Of Family Children Service welfare employees and all other personnel's whom conspiracy under "Racketeering Influenced Corrupt Organizations", crimes false allegations shall render "void judgment", due to a serious error in judgment in plaintiff fundamental rights was unfair and unjust. In violations of plaintiffs and plaintiffs three children due process rights are wrongfully defective. Void judgment is characterized by nullity. The quality or state of being null. An act, proceeding void that has no legal effect compare impediment. The Clayton County Juvenile Court Judgment which lacks jurisdiction of the subject matter., acted In a manner that was inconsistent with due process clause of law was not applied., Fed Rules Civ Proc. Rule 60(b)(4), 28 U.S.C.A.;

*U.S.C.A Const Amend. Klugh v. U.S., 620 F. Supp. 892 (D.S.C. 1985). Clayton County Juvenile Court has no jurisdiction to try plaintiff under allegations without due process clause of law. Clayton County Juvenile Court and employees were in illegally frequently participated in all review panel hearings continued to "illegally Judicate" plaintiffs three minor children. Defendants compelling and coercion plaintiff with sets of forceful actions which violates the free will of an individual in order to induce duress for a desired response. Plaintiff argues that these "color of law" actors known as defendants can not just take plaintiffs three children from their biological mother when plaintiff did not have any criminal charges for her three children and does not have anything relatively to plaintiffs background check does not have any history of neglect or child endangerment. Plaintiffs three children should be released back to their biological mother without further delay as all children and biological mother want to reunite as a fundamental right.*

*Plaintiff challenge Clayton County Juvenile Court could not hear this case as Clayton County Juvenile Court is a specialized court system that is designed to handle cases involving minors who is Under the age of "eighteen". Plaintiff is thirty six years old. If a case does not involve a delinquent act or the accused individual is not a juvenile, then Clayton County Juvenile Court does not have jurisdiction over this case nor does it has jurisdiction to predetermined plaintiff*

guilty of alleged allegations under mere-suspicion in Clayton County Juvenile Court. If an adult is charged with a crime then an adult Superior Court' will hear it., not Clayton County Juvenile Court hearing it and poses sanctions as seemingly guilty under an unlawful plea without any other court hearing about this public corruption that the plaintiff did not have any right to due process clause of law. Subsequently, Procedural Due Process is which the constitution laws hears before it condemns, and for Clayton County Juvenile Court for plaintiff to confine in Clayton County Department Of Family Children Service to comply to their parental classes, psychological evaluations by Clayton County Department Of Family Children Service providers against the plaintiff which violates a conflict of interest for an adult to complete when plaintiff was not tried for any crime, offense, charge, warrant or any evaluations by Clayton County Superior Court. Defendants in this matter has not given plaintiff any rights to her three children. No rights to be involve and manage plaintiffs three children education, medical history, religion beliefs, sports, birthdays, graduations and etc. Clayton County Department Of Clayton County Juvenile Court Associate Judge Rosalind Wakins unlawfully ordered permitting Ellaretta Coleman to withdraw from counsel from representing Rona Johnson Adeoye. Plaintiff asserts to the above courts' that Ellaretta Coleman is not

*an appointed attorney for Clayton County Juvenile Court. It's unlawful and is not in Clayton County Juvenile Court jurisdiction to hear a withdrawal that has jurisdiction in Fulton County Superior Court. Before an withdrawal is ordered., both client and attorney appear before the court. In the scenario this did not take effect. This case shall be heard by a Fulton County Superior Court For The State Of Georgia., not an order render by Clayton County Juvenile Court a conclusion without proper notice or a hearing to contest to any unknown written fabricated withdrawal that was illegally aborted without client's knowledge or having the fair right for due process to contested to., Ellarettta Coleman was an attorney in whom plaintiff appointed counsel outside of Clayton County Juvenile Court. Therefore, Clayton County Juvenile Court Associate Judge "Rosalind Wakins" has unlawfully withdrawn an attorney from a client without lawful jurisdiction. It's in violations of the clients rights and due process clause of law. Clayton County Juvenile Court Associate Judge Rosalind Wakins did not have proper jurisdiction to withdraw clients attorney from withdrawal as client has the right to file a complaint to appeal any decision and file a unethical complaint with the relevant Georgia Bar Association and Judicial oversight and to bring this unethical withdrawal to the appropriate jurisdiction with Fulton County Superior Court. Clayton County Juvenile Associate Judge Rosalind Wakins permits client attorney*

*to withdraw from a case without proper grounds of notice or without following the relevant legal procedures which is an unlawful withdrawal. During, this withdrawal plaintiff was without notice and no hearing was held nor conducted with client and attorney for a withdrawal court date and plaintiff had no say in any unknown withdrawal. Clayton County Juvenile Court continued unlawfully to conduct functions of proceedings without plaintiff having a state funded appointed attorney. Plaintiff challenge Clayton County Juvenile Court Associate Judge Rosalind Wakins has no jurisdiction over this matter. Plaintiff seeks to properly redress through the appropriate legal channels and motion Fulton County Superior Court Judge to vacate the order from Clayton County Juvenile Court Associate Judge Rosalind Wakins that its jurisdiction is with Fulton County Superior Court not with Clayton County Juvenile Court as the order permitting the attorneys wrongfully withdrawal was profound was not of Juvenile Court appointed attorney. Specifically, Clayton County Juvenile Court Associate Judge Rosalind Wakins could not authorized a Clayton County Juvenile Court appointed attorney for plaintiff permitting an unlawful withdrawal from client as plaintiff is appointed counsel by the state. Every citizen in whom is appointed by a state attorney or by a state public defender all have the right to be represented by*

*counsel and Associate Judge Rosalind Wakins shall not permit a withdrawal  
counsel from a client who has no representation that is funded by state which  
violates due process. Clayton County Juvenile Court Associate Judge Rosalind  
Wakins wrongfully voids plaintiffs rights to have represented counsel. Clayton  
County Juvenile Court Associate Judge Rosalind Wakins and Associate Judge  
Christopher Walker conspiracy to proceeded court hearings without plaintiff  
having any state funded attorney. Ellaretta Coleman abuse of power with Clayton  
County Juvenile Court Associate Judge Rosalind Wakins , inappropriate  
Termination of the attorney client relationship (Rule 1.16) failure to perform with  
competence (Rule 1.1) in which Ellaretta Coleman misrepresentation her client  
was incomplete after plaintiff made complete payment. Ellaretta Coleman gave  
her client an ultimatum one option. Either take it or leave it outcome and abide by  
Clayton County Department Of Family Children Service recommendations.Ellaretta  
Coleman engages in conduct that is purposefully and knowing to fail the lack of  
misrepresentation. Clayton County Juvenile Court Associate Judge Rosalind  
Wakins did not comply with the oath of office of the constitution of the United  
States' and engage in acts in violation of the Supreme Laws of the the land which  
shall consider for review for demands for a immediate removal of the bench with  
disciplinary actions for a demand for a jury trial for indictment for all defendant's*

*conspiracy to act as “color of law” actors. Clayton County Department Of Family Children Service, Clayton County Juvenile Court and Clayton County Police Department Sector III Precinct are all subject to and must yield to the Fourth and the Fourteenth Amendment According, to the Circuit and District Courts Of The United States and The Supreme Court. Clayton County Department Of Family Children Service “color of law” actors are sued for violations, of the Fourth Amendment and the Fourteenth Amendment, defendants lose their “Immunity” in Section 242 Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States unlawfully engaging in deprivation of rights under color of law in misusing the law of abuse of power under government authority for self purposes to uphold unlawful acts then resigned by deception of purporting and pretending to act in the performance of their duties while violating the law.*

*Clayton County Police Department assisted Clayton County Department Of Family Children Service in administering deprivation of rights under color of law. Defendants lose immunity and are sued for assisting Clayton County Department Of Family Children Service in a violation of both the plaintiff and the plaintiff children's rights when they criminally and illegally abduct the plaintiffs*

*children and enter into the plaintiff's home without probable cause and exigent circumstances, which are required under the warrant clause of the Fourteenth Amendment. It is not the goal to take another child and illegally abduct its fundamental right from their biological mother in efforts to carry out Title 18 U.S.C Section 241 "Conspiracy Against Rights" This statute makes it unlawful for two or more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory or district in the free exercise or enjoyment of any right or privilege secured by the Constitution or the Laws of the United States, It further makes it unlawful for two or more persons to go in disguise on the highway or on the premises of another with the intent to prevent or hinder their free exercise or enjoyment of any rights so secured. Clayton County Department Of Family Children Service and Juvenile Court Associate Judge Rosalind Wakins and co partnership in concert with Associate Judge Christopher Walker start using logical knowledge before rushing into judgment and to conduct their investigations the same as police in order to be constitutional, correct and legal. Clayton County Department Of Family Children Service must by law comply with the "warrant clause" As required by the Constitution and the Federal Courts whereas they are "government officials" and are subject to the constitution as are the police. There are "No Exemptions"to the Constitution for Clayton County*

*Department Of Family Children Service. Clayton County Department Of Family Children Service lies to the County Of Juvenile Court Judge to get an Fraudulent order, that's also is a violation of the Fourth and the Fourteenth Amendment rights secured which is the civil rights violation under Section Pursuant 1983, in conspiracy against rights covered under U.S.C Section Pursuant 1985. Clayton County Department Of Family Children Service officially knocks on the plaintiffs residence, Defendants has no legal warrant, plaintiff refuse the right for them to gain entry, 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 person or things., and Clayton County Department Of Family Children Service Kayla Buie and all others in concert with the department then threatens the plaintiff with calling Clayton County Police Department Sector III Precinct threatens to force to take plaintiffs children this is also illegal and unlawful in both lose "Immunity" and tackle force entrance with swat team shield techniques into the plaintiffs home with no search warrant. This coercion intimidation tactics even if the police only got the door open so Clayton County Department Of Family Children Service*

can gain entry both are sued for warrant-less entrance for invasion and intrusion is on recording. Defendants engage in discovery in the "Racketeering Influenced Corrupt Organizations". It pertains to conduct associated with an "Enterprise" In a "pattern racketeering activity" an enterprise is an individual or a legal entity, or a union or group of individuals associated in a fact Although not a legal entity, while a pattern of racketeering activity requires long term, organized conduct to violate state and federal laws. Plaintiff, constitutional rights was violated variety of forms ranging from retaliating against plaintiff for expressing her First Amendment right to freedom of speech to arresting plaintiff without possessing probable cause to believe that plaintiff have committed a crime, and arbitrarily depriving of plaintiffs Fourth Amendment, Fourteenth Amendment rights, Fourth Amendment, Fifth Amendment, Sixth Amendment, The Seventh Amendment provides that civil cases preserve the right to a trial by Jury, The Eighth Amendment was violated when plaintiff received excessive bail, excessive fines by Clayton County Bonding Company by the loss of Liberty by cruel and unusual punishments, and all citizens rights of the constitutional right to press, assembly, and the right to petition the government for a redress of grievances. In plaintiffs assert the Court to "apply [the] Supremacy Clause" to the plaintiff's complaint. Plaintiff, challenge the state law on the basis that it is preempted by federal law,

*and therefore violates the Supremacy Clause of the United States Constitution. Plaintiff has lost work and wages. Plaintiff employee has Conducted a checkrs' background check and the only fabricated felony charge that was profound on record was the false obstruction charge that Clayton County Police Department Sector III Precinct unlawfully, illegally and wrongfully committed an offense to jeopardize the representation of the plaintiffs name which cause damages that resulted in deformation and the conclusion of plaintiffs employer has terminated plaintiffs employment. Plaintiff filed a open claim and [a]n internal investigation to dispute for a further review with Checkr' background check stating that Checkr.'*

*Plaintiffs argues that the defendants continuously violated their "Fourteenth Amendment" and disregard plaintiffs due process clause rights. The due process clause has two components: procedural due Process and substantive due process. See McKinney vs. Pate 20-F.3d 1550,1555 (11<sup>th</sup> Cir. 1994). First, the plaintiff argues that the defendants' conduct violated her substantive due process rights. Substantive due process 'protects those rights that are 'Fundamental,' that is, rights that are 'implicit in the concept of ordered liberty.' Id. At 1556 (quoting Palko v. Connecticut, 302 U.S. 319,325 (1937)). The Supreme Court has held that parents have a constitutional protected liberty interest in the care, custody,'*

*and sufficiently management of their children. Plaintiffs, contends that the implementation of a voluntary safety plan was not voluntary but coercion. Defendants' Cps and all others acting along in participation alleges that the voluntary case plan violated plaintiffs right to family Integrity. Plaintiff states to the court that the case plan was fabricated and did not suit the conditions outlined in this fraudulent case.' Instead it was induced by coercion and duress., which deprived plaintiff fundamental liberty interest- the right to family integrity. See Young vs. Vega 574 Fed. App'x. 684, 689-90 ( 6<sup>th</sup> Cir. 2014). These acts by these defendants were clearly established. These precise actions were unconstitutional which violated the law of the Constitution. The act "under the color of law" bounds of unlawful acts were done secretly while the officials was purporting and pretending to act in the performance of their duties. In other words the unlawful acts consist of "abuse of power". This Court' has subject matter jurisdiction Section Pursuant to 28 U.S.C 1331 because the litigation involves claims for deprivation of civil rights under 42 U. S.C Section Pursuant 1983 and the United States Constitution. (2) This Court' also has subject matter jurisdiction Section Pursuant to 28 U.S.C 1343(a)(3)and (4) because this litigation involves claims for deprivation of civil rights under 42 U. S.C Section Pursuant 1983.(3) This court has supplemental jurisdiction over Count III Section Pursuant*

to 28 U.S.C 1367 because Count III is part of the same case or controversy that is the basis of the federal claim; (4) venue in this district it's proper Section Pursuant to 28 U.S.C 1391 because the conduct given rise to this case and damages sustained by the plaintiff occurred in this district. Plaintiff face increasing intrusions into their legitimate decisions and prerogatives by government agencies in situations that do not involve traditional understandings of abuse or neglect but simply are a conflict of parenting philosophies. All courts' recognizes that the pro se litigant pleadings are to be held to less stringent *Haines v. Kerner*, 404 U.S. 519, 520, 92 S. Ct. 594, 596, 30 L. Ed 2d 652 (1972); See.. Also *Matzker v. Herr*, 748 F. 2d 1142, 1146 (7th Cir. 1984). [Federal District Courts must ensure courts give pro se litigants proceedings are given "fair" and meaningful consideration]., and carefully review all circumstances of this given case. In reviewing this amended complaint the court must accept all factual allegations contained in its complaint as true and must also control the pleadings light and reasonable to the pro se litigant status 28 U.S.C Section Pursuant Code 1654 considerable under adequate and legitimate conditions. Apparently, defendants and all others that are in concert with them operated most exclusively in this act outside of justice and its jurisdiction. Plaintiff asserts of corruption in County County Juvenile Court

*proceedings were coercion in the courtroom. Plaintiff asserts that her First Amendment right was violated, deprived and was retaliated against when plaintiff was asserting her Constitution Right' to be rightfully heard when the Clayton County Juvenile Court denied the plaintiff the right of freedom of speech. The First Amendment provides that Congress makes no law respecting an establishment of religion or prohibiting its free exercise It protects freedom of speech, the press, assembly, and the right to government for a redress of grievances. This case involves of a mock court in which the principles of law and justice is disregarded or perverted. [A] court characterized by irresponsible, unauthorized, and irregular void status of law procedures. Defendants' must act in accordance with legal rules and not contrary to them. violations of due process, Johnson v. Zerbst, 304 U.S 458, 58 S. Ct.,1019 (1938); Pure Oil Co. v. City Of NorthLake, 10 Ill. 2d 241, 245, 140 N.E. 2d 289(1956); Hallberg v. Goldblatt Bros.,363 Ill. 25 (1936); A more specific application of Clause' is the doctrine today called "Procedural Due Process", which concerns the fairness and lawfulness of decision making methods used by the courts and the executive. Defendants recklessly violated due process clause and frustrate the fairness of proceedings which was characterized by false information and is missing essential elements and facts of the case that was not added., Georgia U.S.C Code Title 9-Civil*

*Practice Chapter 12 Verdict And Judgment Article 1-General Provisions, Section Pursuant 9-12-16. Validity of judgment when court does not have jurisdiction which interrupt due process that is owed. This void judgment is a nullity from the beginning, and is attended by none of the consequences of a valid judgment by Clayton County Juvenile Court cannot confer jurisdiction where none existed and cannot make a void proceedings valid. A void judgment which includes judgment entered by Clayton County Juvenile Court which lacks jurisdiction purposes over the parties or the subject matter, and lacks inherent power to enter the particular judgment or [a]n order procured by fraud by Clayton County Juvenile Court and influence by Clayton County Department Of Family Children Service and Clayton County Police Department Sector III Precinct, can be attacked at any time, in any court, either directly or collaterally, provided that the party is properly before the court when plaintiffs three minor children came into the system illegally. See Long v. Shorebank Development Corp., 182 F. 3d 548 (C.A. 7 Lii. 1999). It is entitled to no respect whatsoever because it does not affect, impair or create legal rights. "Ex Parte Seidel, 39 S.W. 3d 221, 225 (Tex. This Judicial decision that was invalid and had no legal force or effect at the moment it was issued. Judgments' are considered void when Clayton County Juvenile Court lacked personal of subject*

*Over the matter jurisdiction over this case, The case itself violates the plaintiffs, fundamental right to due process and criminal fraud has been perpetrated upon Clayton County Juvenile Court., void Judgments can be attacked at anytime the defect is realized, even in subsequent proceedings. All proceedings based on a void judgment are likewise void. The judgment is considerably void when Clayton County Juvenile Court lacks Jurisdiction over this specific case. This case was found of insufficient facts, and characterizes by improper bribery and deception under fraudulent acts of abuse of power with the entanglement with defendants carried on several activities regulating to Racketeering Influence Corrupt Organizations in the criminal act or threat involving in [a]n group enterprise that resulting in several crimes relating secretive motions that combines with “white collar” crimes in public corruption, aiding and abetting with the intent to assist in the commission of the crime and elements of a conspiracy showing [a]n agreement to commit a crime, All that is required is that the acted parties had mutual understanding of how to carry out the act to undertake an unlawful plan. Ultimately, create [a]n illusions of facts to Clayton County Juvenile Court Involved in the scheme of bribery. the Alemann cases, Bracey v. Warden, U.S. Supreme Court No. 96-6133; June 9, 1997. Plaintiff was not tried by any district court for the allegations that Clayton County Juvenile Court alleges. Therefore, Clayton*

*County Juvenile Court could not hear a case where the allegations were not tried.*

*Clayton County Juvenile Court gives consequences orders against the adult mother*

*trying her as accused with no due process. Therefore, Clayton County Juvenile*

*Court any judgment issued would be void and have no legal effect. In this instance*

*where judgment shall be void, it is legally invalid automatically at the moment*

*issued, The underlying defect often needs to be brought to the court's attention.*

*However, Once the defect is revealed, the judgment is void as a matter of law and*

*it does not require judicial assent., fraud upon the court, In Re Village Of*

*Willowbrook, 37 Ill., Plaintiff, states that plaintiffs children are witnesses to what*

*has happened in the course of these catastrophic events while being unlawfully*

*removed from their biological mother in how it emotionally affected them*

*drastically., separation anxiety, psychological effects, Post Traumatic stress*

*disorder [PTSD]., and neurological chemical imbalance. Plaintiff three children*

*have been taken from their mother has affected their ability to feel the presence of*

*their mother and how it has affected their daily living. The standard for parental*

*rights is based, in large part, on the Fourteenth Amendment to the United States*

*Constitution, which reads as following: "No State shall make or enforce any law*

*which shall abridge the privileges of citizens of the United States' nor shall any*

*state deprive any person of life, liberty, or property, without due process of law".*

*The United States Supreme Court in Troxel v. Granville, 530 US 47,65 (2000), held that the Fourteenth Amendment due process clause protects the fundamental right to make decisions concerning the care, custody and control of their children.*

*See. Monell v. Department Of Social Service., 436 U.S. 658 (1978).*

#### **V. PRAYER FOR RELIEF**

*Wherefore, The Plaintiff respectfully requests that this Honorable Court:*

- 1. Serve Form [USM-285] for United States Deputy Marshal or the United States Attorney or an approved alternative server of civil and criminal service of process of summons to all defendants in all proceedings in going forth.*
- 2. Enter Judgment in favor of the plaintiff and against the Defendants on each cause of action alleged herein;*
- 3. Award the Plaintiff injunctive and declaratory relief predominatas Compensatory damages, aggravated damages and compensation for exemplary damages, in an amount determined at trial; Rule23(b)(2)(3)*

4. *Award the Plaintiff the full return of her three children incurred in prosecuting this action;*
5. *Compensation for the complete loss of work due to loss of income and wages.*
6. *Grant any further relief that this Honorable Court deems just and proper.*

#### **VI. JURY DEMAND**

*The Plaintiff hereby demands a trial by jury on all issues so triable, in this class action civil complaint.*

#### **VII. CERTIFICATE OF SERVICE**

*I hereby certify that on [February 5th, 2024], Plaintiff electronically filed the foregoing Amended Complaint with the Clerk of the Court using CM/ECF system, which will send notification of such filing to all parties of record.*

*For service of process upon an officer or agent of the United States Government, submit a copy of the writ and a set of Form (USM-285) and one copy of each serve Parti[e].*

*Defendants are to be duly' served, summons and cited' to appear to answer this*

*Amended Complaint',*

*Come this Month of February 5th Day of this calendar year of 2024*

Rona Johnson Adeoye  
Pro se Litigant

Prepared And Presented

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RONA JOHNSON ADEOYE  
AMENDED COMPLAINT

*IN THE UNITED STATES DISTRICT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION*

*CIVIL ACTION CONSOLIDATED CASE No's*

1:22-CV-02838-VMC  
1:22-CV-02839-VMC  
1:22-CV-02840-VMC

**Additional material  
from this filing is  
available in the  
Clerk's Office.**