No. 24-6723

In the
Supreme Court of the United States

Carol Lynne Morgan
Petitioner,

v.

Leby H. Sassya
Respondent,

ON APPEAL FROM THE
OHIO SUPREME COURT

APPEALED FROM

THE ELEVENTH JUDICIAL
COURT OF APPEALS

PETITIONER'S CORRECTED FILING

****

On Appeal and Petition for Writ of Certiorari to The United States Supreme Court From The 11th Judicial Court of Appeals Case No. 2023-TR-0048 (Affirmed). Further Appealed to The Ohio Supreme Court Case No. 2024-0739 (Declined), no Opinion.

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APPEAL AND PETITION FOR WRIT OF CERTIORARI
ORAL ARGUMENT RESPECTFULLY REQUESTED

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QUESTIONS PRESENTED FOR REVIEW

i. FIRST QUESTION PRESENTED FOR REVIEW

When lower Ohio State Courts enter judgments as a result of fraud on the court, lack of jurisdiction, forgery, and collusion, and Petitioner has appealed to, and exhausted every State and Federal Remedy where Court officials have worked in a concerted action to deprive Petitioner of her 1st, 4th, 5th, 9th, and 14th Amendment protected rights, Is this the most salient time when the United States Supreme Court should accept Petitioner's extraordinary case to provide national safeguards against lower State Court's broad and sweeping systemic failure to comply with fundamental Constitutional protections ?

ii. SECOND QUESTION PRESENTED FOR REVIEW

When the Ohio Supreme Court declines to hear Petitioner's timely filed, non- frivolous, 1st, 4th, 5th, 9th, and 14th Amendment Constitutional Question[s] case while failing to provide a Remedy or even an Opinion, Are Petitioner's "Protected" Rights violated when that State's Supreme Court's own **OH. App. Prac. Section 8 : 1.**, explicitly clarifies that its own Ohio State Supreme Court 'has deviated from the Constitution by doing so' ?

iii. THIRD QUESTION PRESENTED FOR REVIEW

When the language of the Ohio State Constitution commands that no person shall be a judge once they have attained the age of Seventy ; meaning that, no person shall be elected by the people ; and no person shall be appointed by the Governor ; is it a Constitutional Conflict that a crafty loophole was created in the Ohio State's Constitution which permits a Judge /Justice to bring back and assign, even temporarily, another age restricted retired Judge to active duty by bypassing and flouting legislative procedures ?

iv. FOURTH QUESTION PRESENTED FOR REVIEW

Is it a Constitutional conflict that the State of Ohio currently has two **(2)** operational Published versions of the Ohio Constitution which confuses Petitioner, and the Public, as to which version must be applied when presenting **"matter of right"** Constitutional Questions presented for Review under the United States Constitution, or of this State, when the Ohio Secretary of State's published version **Article IV. Section 2. (B), (2), (a)** includes enumerated sections, **(i), (ii), and (iii).,** ; yet the OH Const. Art. IV , Section 2. O Const IV Sec. 2 Organization and jurisdiction of supreme court "Currentness" version **Article IV. Section 2. (B), (2), (a)** includes **only** enumerated sections, **(i) and (ii).,** ?

v. FIFTH QUESTION PRESENTED FOR REVIEW

When there is a Felony Forgery of Petitioner's attorney's signature on an official Court document, (a 'JOURNAL ENTRY'), in Petitioner's case which took place without Petitioner's attorney's knowledge or permission, and without a Hearing, Trial, witnesses, or recordations that any proceeding ever took place, and which caused the deprivation of Petitioner's Constitutionally protected right to contract and parent her children, is that criminal Felony Forgery, which was committed by officers of the Court, a Judicial Act ?

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The 11th Judicial Court of Appeals **April 9, 2024 'OPINION'** affirming the Trial Court's Judgment Entry ; the Appellate Court's **May 16, 2024** denial of Petitioner's **Application for En Banc Hearing** ; the Trial Court's **June 14, 2023 Judgment Entry** issued in lack of all jurisdiction ; the Ohio Supreme Court's **September 3, 2024 Entry** also declined **Reconsideration** without an Opinion. **APPENDIX A. B. C. & D. 1. -3.**

Also included are ; the **Ohio Supreme Court's July 27, 2022,** and **August 16, 2022 'ENTRY'** in **Case No. 2022 – 0666,** which declined jurisdiction to hear Petitioner's **'Matter of Right' Constitutional Question Case, (without an Opinion),** however, the said Court stated twice that that Defendant's Motions to declare Petitioner as a vexatious litigator **shall be denied** ; also included is the Petitioner's **May 15, 2019,** Federal filing of her **'1983' Case No. 4 : 19 - cv – 01097- BYP, into the Federal U.S. District Court for the Northern District of Ohio, in Youngstown, Ohio. APPENDIX E. and F. 1.-3.**

JURISDICTION

This Court has appellate jurisdiction over the 11th Judicial Court of Appeals **April 9, 2024 OPINION Entry** in **Case No. 2023 –TR- 00048,** and over the Ohio Supreme Court's **September 3, 2024 Entry** in **Case No. 2024 – 0739.** The Ohio Supreme Court failed to provide a remedy, and declined jurisdiction, **(without an Opinion),** and refused to hear Petitioner's Motion for Relief from Judgment. Petitioner was not allowed to file a Motion for Reconsideration, she was only permitted to file the Motion for Relief from Judgment. Article III, Section 2, Clause 2, provides that, Congress has exercised its power to implement the provision granting the U.S. Supreme Court Appellate Jurisdiction to review both decisions of the inferior Federal Courts, and final judgments from State Courts in cases that involve violations of Constitutional and / or Federal Law.

RELEVANT CONSTITUTIONAL AND STATUTORY PROVISION

28 U.S.C. Section 1257(a), provides: " Final judgments or decrees rendered by the highest court of a State in which a decision could be had, may be reviewed by the Supreme Court by writ of certiorari where the validity of a treaty or statute of the United States is drawn in question or where the validity of a statute of any State is drawn in question on the ground of its being repugnant to the Constitution, treaties, or laws of the United States, or where any title, right, privilege, or immunity is specially set up or claimed under the Constitution or the treaties or statutes of, or any commission held or authority exercised under, the United States."

STATEMENT OF THE CASE

This case presents a tormenting span of over fourteen (14) years of intentional malice, harassment, and injury to Petitioner which began on **June 13, 2012** with a felony forgery of Petitioner's attorney's signature on an official court document which vacated her right to the terms of her fully mediated contractual 'Agreement', and violated her right to Due Process. The felony forgery, **(Extrinsic Fraud /** Fraud on the Court), was committed by an opposing counsel in order to give his client, (Sassya), an unlawful advantage in the case. When Petitioner filed complaints, State and Federal bad court actors retaliated and imposed abusive and unlawful practices upon Petitioner which violated her constitutionally protected 1st, 4th, 5th, 8th, 9th, and 14th Amendment rights. The State and Federal Courts failed to provide Petitioner with Due Process of Law, procedural fairness, or an adequate remedy. These issues make this case appropriate for federal oversight especially where this Court's Opinion, and Constitutional foundation, as found in ***Marbury v. Madison,* 5 U.S. 137 (1803),** has emphasized the Court's duty to protect constitutional rights. The facts and evidence in Petitioner's case are compelling

and shocking to the conscience, thus, she appeals to this High Court after exhausting every State and Federal route available which to obtain a Remedy in Law and equity.

The Ohio State and Federal Court bad actors have concealed and failed to address the extraordinary issues of fraud, fraud on the court, systemic collusion, case-fixing, court ordered polygamy, retaliation, conspiracy to commit deprivations of rights under color of law, **(18 U.S.C. 241. & 18 U.S.C. 242),** harassment, and public corruption **(18 U.S.C. 1961 – 1968),** committed by officers of the court's in Petitioner's case. These bad court actors have knowingly violated clearly established Law of which a reasonable person would have known, and they have intentionally disregarded this Court's precedents.

Petitioner's case has been bouncing around in all levels of the Ohio State and Federal Courts for well over a decade without an adequate remedy. After the felony forgery of Petitioner's attorney's signature was committed on the official court document, but discovered months later, the bad court actors had to then work their way backwards to try and figure out a way to justify how the 'court' came to its conclusion. The bad court actors, in their role as Officers of the Courts, worked in a concerted action to lure Petitioner into a sham legal process and **conspired to defraud, extort money, property, and rights to good government** from Petitioner while also exploiting her minor children which violates **18 U.S.C. 1341., & 1343.** ***McNally v. United States, 483 U.S 350 (1987).***

Officers of the court's concealed the felony forgery on the **June 13, 2012** court document and forced Petitioner to suffer years of extensive 'court' proceedings while fabricating more court Orders to cover up their prior unlawful court Orders of which generated vast amounts of state and federal money being poured into the Trumbull County Court system under the pretense that Petitioner's case was now a "High Conflict" case which supposedly needed funding to resolve. These bad court actors

caused the "High Conflict" in Petitioner's case in order to unlawfully gain emoluments that they were never entitled to while violating : **18 U.S.C. 666., and 18 U.S.C. 287.**

The ***63C Am. Jur.2d, 'Public Officers and Employees', Section 247,*** states : " As expressed otherwise, the powers delegated to a public officer are held in trust for the people and are to be exercised in behalf of the government or of all citizens who may need the intervention of the officer. **[1]...., [2]...., [3].,** and owes a fiduciary duty to the public. **[4]...., [5].** "Furthermore, it has been stated that any enterprise undertaken by the public official who tends to weaken public confidence and undermine the sense of security for individual rights is against public policy. Fraud in its elementary common law sense of deceit - and this is one of the meanings that fraud bears [***483 U.S. 372***] in the statute. ***See : United States v. Dial, 757 F.2d 163, 168 (7th Cir. 1985)*** includes the deliberate concealment of material information in a setting of fiduciary obligation. A public official is a fiduciary toward the public, **including, in the case of a judge,** the litigants who appear before him **and if he deliberately conceals material information from them, he is guilty of fraud.** ***McNalley v. United States, 483 U.S. 350 (1987).***

The bad court actors / conspirators, in Petitioner's case received state and federal emoluments for over (14) years while conspiring to commit actions of, but not limited to these ; fraud, fraud on the court, court forced polygamy, felony forgery on an official court document, harassment, and tampering with records **in violation of the Hobbs Act. 18 U.S.C. 1951.** This Court holds in ***Kelly v. United States, 140 S. Ct. 1565 206 L. Ed.2d 882 (2020). 'The federal wire fraud statute makes it a crime to effect (with the use of wires) "any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises.' 18 U.S.C. Section 1343.*** Petitioner reported the bad court actors to the Authorities, they went after

her children and took them away from her to inflict what the Ohio Supreme Court refers to as **"the family law equivalent to the death penalty in a criminal case."**

Petitioner Declares under Penalty of Perjury and in compliance with 28 U.S.C. 1746, that the following facts and evidence are true and correct to the very best of Petitioner's knowledge, please excuse any unintentional scrivener's errors :

Petitioner recites that 28 U.S.C. 2403(a) may apply and shall be served on the Solicitor General of the United States, Room 5616, Department of Justice, 950 Pennsylvania Ave., N.W. Washington D.C. 20530-0001 ; Petitioner also recites that 28 U.S.C. 2403(b) may apply and shall be served on the Attorney General of Ohio Rhodes State Office Tower, 30 E Broad Street 14th Floor, Columbus, Ohio 43215. **OF NOTE : Ohio Attorney General Dave Yost has, for many years, had knowledge of what the bad court actors have committed in Petitioner's case, he failed to take any step to correct the matter or give remedy, he states his office duty is to defend the judges and lawyers. Dave Yost is listed as a party in Petitioner's Federal *Case No. 4 : 19 - cv – 01097- BYP,* U.S. District Court for the Northern District of Ohio.**

Petitioner repeatedly filed into the Ohio State and Federal Courts seeking remedy for the felony forgery of her attorney's signature on the **June 13, 2012 'Journal Entry'**, in ***Case No. 2011 DS 000293,*** which vacated her right to contract. The Clerk's office filed the stamped forged instrument into the record. This **Entry** was issued as a result of fraud on the court, collusion, tampering with records, deprivations of constitutionally protected rights, and criminal act of felony forgery on an official court document.

The 11th Judicial Appellate Court initially ruled in Petitioner's favor in ***Case No. 2013 -TR- 00084.*** When Petitioner went to the authorities about the forged instrument, the Appellate judges joined the conspiracy and fabricated Opinions to aid in covering up

of the lower court's fraud and criminal activities which brought huge amounts of money into their County. The attorneys involved concealed that Petitioner's entire Dissolution and Separation Agreement was "vacated" by way of a felony forgery and tampering with records. Petitioner informed the Appellate judges about the forgery matter in at least four (4) Separate Appeals and in (3) Separate Motion's 60 B. (3)(5), yet, with blind deference, the Appellate Judges simply affirmed the trial court's unlawful Orders. The Ohio Supreme Court unconstitutionally 'declined' to hear Petitioner's Appeal as a "Matter of Right", and has denied her Motions for Reconsideration, and Relief From Judgment.

There are two **(2)** different Published versions of the Ohio Constitution **currently** being used which confuses Petitioner, and the General Public, as to which version must be applied when presenting **"matter of right"** 'Constitutional Questions presented for Review under the United States Constitution, or of this State.' The Ohio Secretary of State's published version **Article IV. Section 2. (B), (2), (a)** includes enumerated sections, **(i), (ii), and (iii).,** ; yet the OH Const. Art. IV , Section 2. O Const IV Sec. 2 Organization and jurisdiction of supreme court "Currentness" version **Article IV. Section 2. (B), (2), (a)** includes **only** enumerated sections, **(i) and (ii). APPENDIX G. 1. - 3.**

The Ohio State and Federal Court's have violated **18. U.S. Code 4.** These Officers of the Courts have known for years about the forgery, collusion, fraud on the court, court forced polygamy, and violations of Petitioner's protected right of Due Process, yet failed to perform the duties of their office. Petitioner was harassed and deprived her of her Substantive Constitutionally Protected Right to Contract, and in Retaliation, her right to parent her natural biological children. All Court Orders issued **"After"** the **June 13, 2012** criminal felony forgery are issued in complete lack of all jurisdiction. The trial court refuses to correct their errors. The Appellate Court affirmed all further Appeals.

The Ohio Supreme Court and Federal Court refuse to hear Petitioner's case to avoid holding the officers of the court's accountable which would expose their sham legal process and expose all of the money and **Title IV- D Funding they made off of Petitioner's case, and her Name.** ***"Public officials, whether governors, mayors or police, legislators or judges, who fail to make decisions when they are needed or who do not act to implement decisions when they are made do not fully and faithfully perform the duties of their office." Scheuer v. Rhodes, 416 U.S. at 241-242 (1974).***

Sassya's attorney at that time, David E. Boker, callously admitted that he signed Petitioner's attorney Verkhlin's name to the **June 13, 2012** Journal Entry. Magistrate Natale never signed his own Journal Entry, the outgoing judge James signed the forged document, and the Clerk of Courts filed it. Only attorneys are allowed to speak during court proceedings and Petitioner was silenced, and therefore, she began to file her own court documents so that her side, as it actually happened, would be heard. When Petitioner told the Appellate Court in her Briefs and Oral Arguments about the felony forgery on her court document, fraud upon the court, and collusion, etc., the Appellate Judges taunted her approach and ***pro se*** status and protected their cadre of court friends.

On **May 15, 2019,** Petitioner filed her *pro se* **'1983'** Complaint, ***Case No. 4 : 19 - cv - 01097- BYP,*** into the Federal **U.S. District Court for the Northern District of Ohio,** Petitioner was granted *informa pauperis* just long enough for the Federal Court to deny her claim. Petitioner's Federal **case was not reviewed** by a Federal Judge or Magistrate, instead, **her case was screened by an attorney** who then read her case filing, had a conference with the members of the Trumbull County BAR association, then typed up a Judgment Entry and Judge Benita Pearson signed it. According to the Federal Clerk's office, an attorney 'screens' all Federal cases in Northeastern Ohio, and that attorney

decides who's case gets heard, and who's doesn't. Petitioner was affrontly referred to as a **"state court loser'**, and her case was unlawfully kicked out of the Federal Court based on the ***Rooker- Feldman*** Doctrine, the Doctrine of ***Res Adjudicata,*** and ***(allegedly), no jurisdiction.*** The ***Rooker – Feldman Doctrine,*** and the ***Res Adjudicata Doctrine*** can never be applied when there is Fraud or Collusion, especially where there is Extrinsic Fraud Upon the Court. ***Long v. Shorebank Development Corp., 182 F.3d 548 (C.A. 7th Cir. 1999)... In Re Sun Valley Foods Co., 801 F.2d 186 (6th Cir. 1986)... 63 Ohio Jur. 3d Judgments Section 355. Nature and basis of res judicata doctrine.***"

The U.S. Constitution never made any provision or Law that entitles officers of the Courts, and their affiliates, to any type of Immunity or Summary Judgment when they commit fraud / fraud upon the court. As a matter of well established Law: ***"We hold that state officials, sued in their individual capacities, are "persons" within the meaning of Section 1983. The Eleventh Amendment does not bar such suits, nor are State officers absolutely immune from personal liability under Section 1983 solely by virtue of the "official" nature of their acts." Hafer v. Melo, 502 U.S. 21 (Supreme Court 1991). "Thus, "[o]n the merits, to establish personal liability in a Section 1983 action, it is enough to show that the official, acting under color of state law, caused the deprivation of a federal right.*** Since, ***Exparte Young, 209 U.S. 123 (1908), the Supreme Court held, "it has been settled that the Eleventh Amendment provides no shield or a state official confronted by a claim that he had deprived another of a federal right under the color of state law."*** Through Section **1983,** Congress sought ***"to give a remedy to parties deprived of their constitutional rights, privileges and immunities by an official's abuse of his position." Monroe v. Pape, 365 U.S. 167, 172***

(1961). Accordingly, it authorized suits to redress deprivations of civil rights by persons acting "under the color of any [state] statute, ordinance, regulation, custom, or usage." Scheuer v. Rhodes, 416 U.S. 236–Supreme Court (1974), "Since the statute relied on the use included within its scope the '[m]isuse of power, possessed by virtue of state law and made possible only because the wrongdoer is clothed with the authority of state law,'' id., at 184 (quoting United States v. Classic, 313 U.S. 299, 326 (1941), government officials, as a class, could not be totally exempt, by virtue of some absolute immunity, from liability under its terms. Indeed, as the Court also indicated in ***Monroe v. Pape, supra,*** the legislative history indicates that there is no absolute immunity for officials acting outside the scope of their duties and responsibilities.

In, ***Exparte Young,*** it teaches that when a state officer acts under a state law in a manner violative of the Federal Constitution, **he then** ***"comes into conflict with the superior authority of that Constitution, and he is in that case stripped of his official or representative character and is subjected "in his person" to the consequences of his individual conduct. The State has no power to impart to him any immunity from responsibility to the supreme authority of the United States." Id., at 159-160. (Emphasis supplied.)*** **It Is A Fraud To Conceal A Fraud.**

Justice Brennan stated ***in Harlow v. Fitzgerald, 457 U.S. 800–Supreme Court (1982), "I agree with the substantive standard announced by the Court today, imposing liability when a public-official defendant, "knew or should have known" of the constitutionally violative effect of his actions. Ante, at 815, 819. This standard would not allow the official who "actually knows" that he is violating the law to escape liability for his actions, even if he could not have "reasonably have been expected" to know what he actually did know. Ante, at 819, n33. "Thus the clever and unusually***

well-informed violator of constitutional rights will not evade just punishment for his crimes. I also agree that his standard applies "across the board", to all "government officials performing discretionary functions."

In Beard v. Udall, 648 F.2d 1264, (9th Cir. 1981), "This court, relying on the Supreme Court's decision in Stump v. Sparkman, 435 U.S. 349, 98 S.Ct. 1099, 55 L.Ed.2d 231 (1978), held that a judge does not enjoy judicial immunity if the judge's actions were either non-judicial or taken in clear absence of all jurisdiction." Rankin v. Howard, 633 F.2d 844 (9th Cir. 1980), ...Forrester v. White, 484 U.S. 219, at 227-229, (1988) quoting Exparte Virginia, 100 U.S. 339, (1879) "A judge is not immune for actions, though judicial in nature, taken in the complete absence of all jurisdiction." Id, at 356-357;... Bradley v. Fisher, 80 U.S. 335 20 L.Ed. 646 13 Wall., at 335, (1871).... In, Stump v. Sparkman, 435 U.S. 349, (1978), ... the Supreme Court restated two factors in determining whether an act is "judicial." First, the courts have to review 'the nature of the act itself, i.e., whether it is a function normally performed by a judge, and....the expectations of the parties, i.e., whether they dealt with the judge in his judicial capacity.' 435 U.S. 349, (1978). "The Court, however, has recognized that a judge is not absolutely immune from criminal liability." Exparte Virginia, 100 U.S. 339, 34-349 (1879), or from a suit for prospective injunctive relief, Pulliam v. Allen, 466 U.S. 522, 536-543 (1984), or from suit for attorney's fees authorized by statute, id., at 543-544. "Government officials performing discretionary functions generally are shielded from liability for civil damages insofar as their conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known." Harlow v. Fitzgerald, 457 U.S. 800, 818, 102

S.Ct. 2727, 73 L.Ed. 2d 396 (1982). ** **Forgery on Court Documents is not a Judicial Act, and there is no statute of limitations for Extrinsic Fraud, Fraud on the Court.**

OF NOTE : The 'screening' attorney in Petitioner's Federal **'1983'** case **falsely** stated that Petitioner did not inform the Appellate Court about the felony forgery, collusion, and deprivations of her constitutionally protected rights in her **Appellate *Case No. 2018 -TR- 00013*** case, Petitioner **did** inform the Appellate Court of these facts in her Oral Argument and into all of her subsequent related Appellate Briefs and Oral Arguments. **APPENDIX H. {2018 -TR- 00013 Appeals Transcripts}.**

The Federal 'screener' stated on **Page 2.** of his Memorandum and Order, "According to Hicks' letter, 'Verkhlin does not wish to pursue a forgery investigation and, while he does not know why he didn't sign the document, the entry accurately reflects the parties agreement.' Petitoner's former attorney Verkhlin does **Not** have a choice of whether to pursue the forgery investigation or not, the Law demands that Verkhlin must pursue the felony forgery of his name on an official court document that deprived his client of her right to contract and of Due Process. The 'screener' also stated that Verkhlin said "he does not know why he did not sign the document", **(June 13, 2012 Journal Entry),** but the screener completely glossed over and left out the part where former attorney **Mark Verkhlin said that "he is certain that it is Not his signature on the Journal Entry", and "he does Not know who signed his name to the Journal Entry." EXHIBIT 1.**

Further, Verkhlin did Not agree to the vacation of Petitioner's Dissolution and Separation Agreement Contract, and yet he had no explanation of why he didn't go to the authorities and report the felony forgery of his signature on the **June 13, 2012 Journal Entry.** (Verkhlin), became part of the conspiracy and he tried to escape responsibility by fabricating a story line to try and cover for himself, even though, as

proof, Verkhlin filed **subsequent** Objections, Motion for Stay, Memorandums in Support, Motion for New Hearing, and two (2) separate Appeals into the Appellate Court, and yet Verkhlin concealed the forgery of his signature on **June 13, 2012. EXHIBITS 2. 1.- 4.**

The Appellate ***Case No. 2013 -TR- 00084,*** is the Appeal which (Verkhlin) filed **'after'** the felony forgery was committed on the **June 13, 2012** Journal Entry, thus proving that Petitioner's former attorney Verkhlin would have never agreed to the unlawful forgery of his signature on the **June 13, 2012 Journal Entry** that vacated Petitioner's Dissolution and Separation Agreement Contract. There was no trial or Hearing on **June 13, 2012.** There were no witnesses testimony taken, and there are no recordations that any such event ever took place. Petitioner's Constitutionally protected right to Contract was breached and vacated by way of criminal forgery, Fraud on the Court, and violations of Due Process of Law. **[Felony Forgery on Official Court Documents is outside the scope of court related duties and responsibilities, done under Color of Law, and is Not a Judicial Act.] APPENDIX I. {The Appeal}.**

HISTORY OF THE CASE WITH SUPPORTING FACTS

On **August 30, 2011,** Petitioner went to the Trumbull County Domestic 'court', to pick up a *pro se* Divorce packet, officers of the court advised her to file a Dissolution instead on the promise that it was a friendlier way to divorce and it would be done and finalized much faster. Petitioner filed a Dissolution in ***Case No. 2011 DS 000293.*** The officers of the court failed to inform Petitioner that a Dissolution can be converted to a Divorce, but not the reverse. Petitioner's case was immediately put on the 'Special Project Judges", docket even though there were no "Special" circumstances in her Dissolution case, everything was signed and agreed upon. The trial court docket shows that on **11 / 10 / 2011,** the trial court sent for, and received Petitioner's Birth Certificate.

Appellee Sassya did not want to pay for an attorney, he told Petitioner to have her attorney type up what both parties had agreed to during court mediation and he will sign it. It was agreed that Petitioner would be the custodial / residential parent of all five of the parties minor children for school purposes and also because Father worked an hour from home and did not want to pay for child care, it was cheaper, he said, to keep the minor children with mom. It was also agreed that in exchange for waiving all future claims to Sassya's 401 K, his stocks and bonds, his ING., and all of his retirement funds, Petitioner would receive an all-inclusive amount of $ 1,800. 00 per month to cover child support, spousal support, and the now well over $ 24, 000. 00 family credit card debt that Petitioner only agreed to take on contingent upon her receiving the all-inclusive $ 1, 800. 00 per month amount. In addition, Petitioner would get half of the price of the marital home, the federal court proceeds to be spent on the children, one set of dishes, some toys for the children, the children's beds, and one T.V.

APPENDIX J. {Excerpts from Final Decree}.

On **September 12, 2011,** the parties appeared before Magistrate Anthony Natale and presented their fully mediated, signed, and agreed upon Separation Agreement Contract. Petitioner was granted her Dissolution and Separation Agreement Contract. The trial court listed the contracted amount of $ 1,800. 00 per month only as 'child support' supposedly for ease of the court's paperwork. On **October 3, 2011,** the parties Dissolution and Separation Agreement Contract was incorporated into the Final Decree, it was signed to again, without any written changes requested, or made, by the parties, which is a requirement for any modification. The **Ohio Revised Code,** ***3105. 171 (I) provides only that " [a] division or disbursement of property or a distributive award made under this section is not subject to future modification by the court except upon express written***

consent or agreement to the modification by both spouses." Sassya never filed Objections, an Appeal, nor filed a Motion 60 B., to the **October 3, 2011 Decree,** they were his terms. The **October 3, 2011** Decree is Final ; as a general rule ; once a final judgment is entered ; it cannot be reconsidered by the trial court.

Two weeks later on **September 24, 2011,** Appellee Sassya was arrested for serious Domestic Violence offences against Petitioner, his charges were later pled down and he was found Guilty of lesser charges. Sassya was on Probation for two years and had to attend Anger Management classes. **EXHIBIT 3. {Proof of Serious Offenses}.**

Petitioner was granted a (5) year Protection Order against Sassya in **Mahoning County,** ***Case No. 2011 - DV – 00677*** which included her minor children. In anger and retaliation, Sassya refused honor the terms of the parties Separation Agreement Contract, and Sassya's attorney David Boker lied to the court and said the Contract was flawed, there was no flaw, nothing had changed, except, **after the Protection Order was issued,** the parties two older minor sons went back to reside with Sassya so they could stay in their regular school and be with their friends, but that would never give rise for the trial court to vacate Petitioner's entire Dissolution and Separation Agreement Contract.

In **February of 2012,** Petitioner returned to the trial court for enforcement of the Final Decree and Separation Agreement Contract, she did not receive the $ 1,800. 00 for October, November, December, of 2011, nor January and February of 2012. Petitioner received the agreed $ 1,800. 00 **only** for **March of 2012,** and **April of 2012 .** Trumbull County made money off of Title IV- D Funds for child support Petitioner did Not get.

On **May 4, 2012,** Magistrate Natale unlawfully breached the terms of the parties Separation Agreement Contract and sequestered $ 600. 00 from the $ 1,800. 00 agreed per month amount without reason. The was **no** Order to change the custody or visitation

schedule. Sassya's attorney at the time, David Boker, is the Chief Prosecutor over child support matters in Trumbull County, Mr. Boker is also married to the now retired Administrative Judge Pamela Rintala of the same Trumbull County court where he (husband), and she (wife), worked together for over (25) years using different last names. Mr. Boker abused his wife's 'Administrative Judge' position, and his position as Chief prosecutor over child support matters to preclude his client Sassya from having to pay the agreed upon per month amount of $ 1,800. 00, the money went to Mr. Boker and his scheme instead of the child support going to Petitioner's very young children.

On **June 13, 2012,** ten months **after** the parties **Final Decree** was signed and finalized, the courtroom became a crime scene. Sassya wanted do-over's, and instead of filing objections, a Motion 60 B., or an Appeal, Sassya's then attorney, David Boker, an officer of the court, abused his positions in order to give his client an unlawful advantage, with arrant dishonesty, he admittedly forged Petitioner's attorney's signature on an official court document, **"Journal Entry"** which vacated and breached the Party's Dissolution and Separation Agreement contract **APPENDIX K. {Proof of Forgery}.**

The trial court docket reflects that **'Only'** an **Evidentiary Hearing** was set for **June 13, 2012, Not a Motion to Vacate.** Petitioner never received **'Notice'** to appear in court that day for either Motion. There was no evidence presented, **no** witness testimony was given, there are **no** recordations for that day because **no** hearing or trial of any kind occurred that day. There is **No Motion to Vacate Hearing** listed on the court's docket for **June 13, 2012.** The U.S. Supreme Court holds that, ***"Procedural Due Process means that some kind of hearing is a requirement before one can be deprived of a constitutionally protected right." Goldberg v. Kelly, 397 U.S. 254 (1970). "Such Notice must describe the legal procedures necessary to protect one's interest", City of***

West Covina v. Perkins, 525 U.S. 234 (1999). "The Due Process Clause does not guarantee process for process's sake, " it guarantees processes for protecting substantive rights". Town of Castle Rock v. Gonzales, 545 U.S. 748, 755-756, (2005). **APPENDIX L. {June 13, 2012 Journal Entry}. And EXHIBIT 4.**

On **June 13, 2012,** the trial court lost plenary power, and all jurisdiction, and was prohibited by Law to advance any further Orders in Petitioner's case due to the **Fourth Amendment 'Fruit of the Poisonous Tree'** Fraud Upon the Court, felony forgery on an official court document, and Tampering with Records in favor of Sassya. **Felony Forgery on an official Court document, Is Not a Judicial Act. It is a Prohibited Act according to Law. The *Ohio Constitution Article II Section 28., and the U. S. Constitution Article 1. Section 10. Clause 1., protects the Right to Contract.***

The "power to contract is unlimited", this right is such as existed by the law of the land, ...and can only be taken by way of Due Process of law, and in accordance with the Constitution." **Mr. Justice Bradly** spoke these words, *"It may be that it [the proceeding in question] is the obnoxious thing in its mildest and least repulsive form, but illegitimate and unconstitutional practices get their first footing in that way - - namely, by silent approaches and slight deviations from legal modes of procedure. This can only be obviated by adhering to the rule that constitutional provisions for the security of person and property should be liberally construed". . .* ***"It is the duty of courts to be watchful for the constitutional rights of the citizens, and against any stealthy encroachments thereon. Their motto should be obsta principiis." Hale v. Henkle, 201 U.S. 43 (1906).***

The **June 13, 2012** trial court Journal Entry is **"Void"** and unenforceable for it was procured by way of Fraud Upon the Court, Lack of Jurisdiction, Lack of Notice, Lack of Due Process of Law, which was committed by officers of the court. ***"A void***

judgment is a nullity from the beginning, and is attended by none of the consequences of a valid judgment. It is entitled to no respect whatsoever because it does not affect, impair, or create legal rights." Griffin v. Griffin, 327 U.S. 220 (1946).

"And there is no question that, "Fraud vitiates everything in which it touches", "fraud vitiates the most solemn contracts, documents, and even judgments." U.S. v. Throckmorton, 98 U.S. 61 (,25 l. Ed. 93)... Marshall v. Holmes, 141 U.S. 589, 12 S.Ct. 62, 35 L.Ed. 870, (1891). In, ***'Throckmorton'***, and ***'Holmes'***, the U.S. Supreme Court addresses Extrinsic fraud, and Intrinsic fraud, both of with has occurred in Petitioner's case. ***Throckmorton,*** and ***Holmes,*** have slightly differing opinions, however, neither has ever been overruled, and both currently stand today. The Extrinsic Fraud, (forged court document) in Petitioner's case would clear the way for Federal Review.

Fraud upon the court is an elusive creature and must be rectified by an adequate remedy at Law. ***"From the beginning, there has existed alongside the term rule a rule of equity to the effect that, under certain circumstances, one of which is after-discovered fraud, relief will be granted against judgments regardless of the term of entry" and "where the situation has required, the court has, in some manner, devitalized the judgment even though the term at which it was entered had long since passed away." Hazel-Atlas Glass Co. v. Hartford-Empire Co., 322 U.S. 238 (1944).***

"The trial court has limited authority at the dissolution hearing. The court has no unilateral authority to modify any provision of the separation agreement." Once the separation agreement is incorporated into the decree of dissolution, the separation agreement then becomes a "binding contract between the parties." **Substantive Law controls this issue, not the trial courts.** ***Morris v. Morris, 148 Ohio St.3d 138 (2016).***

"Any modification of a separation agreement, other than one permitted by Revised Code, would be inequitable because it would require the court to set aside the dissolution, and restore the marriage." Morris v. Morris, 148 Ohio St.3d 138 (2016).

Petitioner, a mother of (6) children was now financially broke, she did not receive the agreed upon $ 1, 800. 00 amount and she had little ones to care for after freeing herself from almost two decades of living in an abusive marriage. Sassya's violence and his ability to pay attorney Boker to manipulate his court positions as the Administrative judge's husband and Chief prosecutor over child support matters caused Petitioner to mistrust the judicial system. The trial court usurped powers it didn't possess in order to take everything away from Petitioner that the parties had fully agreed upon and she was terrorized by the courtroom because of the injustice, corruption, collusion and case-fixing.

Petitioner desperately searched for ways to stay safe from Sassya and from being jailed by the court. Sassya used the Courts as a weapon against Petitioner while she focused on taking care of her very young children now that the agreed upon $ 1,800. 00 monthly amount was unlawfully vacated by the trial court's crimes. Petitioner got married to her eldest daughter's boss so that she could work in his restaurant and keep her small children warm, fed, and safe. When the trial court unlawfully vacated Petitioner's Dissolution and Separation Agreement, it made Petitioner legally married back to Sassya again. **Petitioner now had two (2) husbands, for (2) years, at the same time** and she told the Magistrate at the **October 3, 2012** Hearing that she was unable to renew her driver's license because the BMV didn't know what her last name was supposed to be.

After Magistrate Natale unlawfully vacated Petitioner's **Final Decree and contract** on **June 13, 2012,** Petitioner was awarded only $ 743. 00 a month in child support and a new trial court judge joined the conspiracy, Judge Sandra Harwood quickly granted

Sassya a Divorce and summary judgment on **July 10, 2013,** in order to conceal Magistrate Natale's, David Boker's, and Mr. Sassya's unlawful malevolent criminal acts.

Petitioner's former attorney Verkhlin did not find the court ordered polygamy to be a laughing matter so he filed an appeal in **Appellate** ***Case No. 2013 -TR- 00084.*** Mark Verkhlin did not inform the Appellate Court about the court ordered polygamy or the felony forgery of his signature because he said he feared the retaliation if he did.

Further, in Petitioner's ***Appellate Case No. 2013 -TR- 00084,*** the said Appellate Court stated that, **" Morgan should have had a right to be heard", and, "Morgan's Separation Agreement is a contract which is actionable upon breach."** Petitioner's ***2013 -TR- 00084*** Appeal was [Reversed, Remanded], and stands as the **Law of the Case.** Under the law of the case doctrine, ***"The decision of a reviewing court in a case remains the law of that case on the legal questions involved for all subsequent proceedings in the case at both the trial and appellate levels. "Nolan v. Nolan (1984), 11 Ohio St.3d 1, 3, 11 OBR 1, 2-3, 462 N.E.2d 410, 412.***

On **November 14, 2014**, upon remand, the same Magistrate Natale that participated in the initial felony forgery and fraud upon the court, held a Hearing. Petitioner testified about her attorney Verkhlin's signature being forged on the **June 13, 2012 Journal Entry,** however, Magistrate Natale refused to correct and repair the fraud upon the court. ***"An inferior court has no discretion to disregard the mandate of a superior court in a prior appeal in the same case." Nolan v. Nolan, 11 Ohio St. 3d 1 (Ohio 1984). State, ex rel. Potain, v. Mathews, 59 Ohio St.2d 29, 32 [13 O.O.3d 17], (1979).***

On **December 19, 2014,** Judge Sandra Harwood approved Magistrate Natale's **false** statement that the parties had reached new stipulations, which is not true. Magistrate Natale fabricated the new stipulations that gave Petitioner $ 885. 00 per month, (a

thousand dollars less) and he tried to force Petitioner to agree to it, but she refused. **Petitioner never signed or agreed to any newly written stipulations. APPENDIX M.**

Verkhlin filed objections to the **December 19, 2014** Order which was overruled by Judge Harwood so he filed another Appeal in ***Case No. 2015-TR-00026.*** Petitioner paid for the trial court transcripts which are required to file objections. Petitioner's objections were overruled by Judge Harwood for supposedly not having the transcripts that were already paid for. The trial court stated in a letter that **"at an earlier time in the year, the recording box malfunctioned so there were no transcripts available for the November of 2014 Hearing."** The trial court attempted to prevent Morgan from filing another appeal for the enforcement of her Separation Agreement Contract by getting rid of the trial court transcripts. The trial court did not want the Appellate Court to know about the felony forgery or the court ordered polygamy. Verkhlin charged Petitioner a large retainer fee to re-file the second Appeal, ***Case No. 2015-TR-00026,*** he then absconded with her retainer fee, and money from many other clients. **APPENDIX N.**

Petitioner now had to proceed alone. As a ***pro se*** litigant she was besmirched and treated with disrespect and hostility by several officers of the courts and their affiliates who intentionally muddied her file with lies and disinformation in order to cover up for their fraud upon the court, polygamy, tampering with records, and multiple violations of Petitioner's constitutionally protected rights. Petitioner suffered over {14} years of torment, anguish, and severe health problems caused by the mistreatment and legal abuse she encountered after filing for a simple Dissolution of marriage. Petitioner's doctors and counselors provide her current status. ***"[A]llegations such as those asserted by petitioner, however inartfully pleaded, are sufficient to call for the opportunity to offer supporting evidence." (percurium), "holding pro se complaint, "to less stringent standards than***

formal pleadings." Haines v. Kerner, 404 U.S. 519, 520 (1972)... "The rules of procedure do not require sacrifice of the fundamental justice." Hormel v. Helvering, 312 U.S. 552, 557 (1941). "Courts will go to particular pains to protect pro se litigants against the consequences of technical errors if injustice would otherwise result." U.S. v. Sanchez, 88 F.3d 1243 (D.C. Cir. (1996)... The courts provide pro se parties wide latitude when construing their pleadings and papers. When interpreting pro se papers, the Courts should use common sense to determine what relief the party desires, and provide relief on any legal theory. " United States v. Miller, 197 F.3d 644, 648 (3rd Cir. 1999). **EXHIBIT 5.**

In ***Case No. 2015 - TR- 00026,*** the Appellate Court did not follow its own **'law of the case',** it simply affirmed the trial court's **false** statement that had Petitioner agreed to new stipulations, when she did not. The Appellate Court already adjudicated in ***Case No. 2013 -TR- 00084,*** that Petitioner's Separation Agreement is a contract between herself and Sassya and No third party may interfere in that contract. The trial court had no authority to modify or vacate the terms of Petitioner's Separation Agreement Contract **without her written permission. APPENDIX O. {Appellate 2015 Transcript.}**

Petitioner went to the FBI, the Governor, the Ohio Attorney General, members of Congress, and called her State Senator's office and told him about the seriousness of what the Courts were doing in her case. Magistrate Natale did not recuse himself, he was forced off of Petitioner's case. Magistrate Raymond DeLost was then assigned to the case. Unbeknownst to then State Senator Schiavoni, Magistrate DeLost immediately joined the conspiracy to further deprive Petitioner of her constitutionally protected right to contract when he conspired with the G.A.L., Charles Draa, Sassya, and attorney Deborah Smith to retaliate and find a way to punish Petitioner and take her minor

children from her so that Sassya would never have to pay the $ 1, 800. 00 per month amount. This is cruel and unusual punishment in violation of the **8th Amendment.**

On **May 19, 2017,** Petitioner was granted a **second (5) year Civil Protection Order Mahoning County,** ***Case No. 2016 - DV - 00689.*** In retaliation, (2) weeks later, Sassya and his new attorney Deborah Smith filed false and fabricated parental alienation allegations against Petitioner in Trumbull County, but it was Sassya's second Mahoning County **arrest bond,** and the Trumbull County **September 13, 2016** trial court Order suspended father's visitation due to the proven allegations of child abuse and for causing harm and emotional distress to Petitioner which is fully outlined in the mentioned **2017** Protection Order. **APPENDIX P. {Second Mahoning County Protection Order}.**

Petitioner cannot be blamed for the court Orders issued by Mahoning and Trumbull County which prohibited Sassya from having contact with the parties children, she was simply complying with Court Orders. The law is very clear, ***" Failure to protect ones child from physical abuse of another is in violation of a statutory duty which will sustain a conviction for endangering children in violation of R.C. 2919.22." Conkel v. Conkel, 31 Ohio App.3d 169, 509 N.E. 2d 983 (Ohio App. 1987); . . . State of Ohio v. Schultz, 457 N.E.2d 336 (Ohio Ct. App. 1982). . . Citing: O. Jur 3d. Criminal Law Sections 1767, 1768; . . O.R.C. 2151.421, ; 2151.99.*** **APPENDIX Q. & R., and EXHIBIT 6. {Mahoning and Trumbull County Court Orders, Sassya's transcript}.**

Two weeks after being granted the second (5) year Mahoning County Protection Order, Petitioner received **"Notice"** that a **"contempt motion" hearing, (only),** would be held on **June 9, 2017** in Trumbull County to address Sassya's allegations. Petitioner was **never "Noticed"** that an ambush **custody trial** would occur that day instead, the custody trial was contingent upon the **June 9, 2017** findings and was rescheduled for

June 29, 2017 if needed, this is proven by the notices and the trial court's docket. **The trial court's docket does not list or indicate that a custody trial had ever even occurred on June 9, 2017, or on June 29, 2017. EXHIBITS 7. & 8. & 9. & 10.**

On **June 9, 2017, Appellee Sassya voluntarily " withdrew"** his contempt motions against Petitioner, and the trial court **completely Dismissed all three (3) of the false Contempt Motions at the very beginning of the hearing on June 9, 2017.** According to **(Civ. R. 41),** ***"Once the case has been withdrawn and dismissed, the trial court patently and unambiguously lacks jurisdiction to proceed." "If the absence of jurisdiction is patent and unambiguous, there is no need to inquire into the existence of an adequate remedy at law. Id. at 26, State ex rel. Greene Cty. Bd. of Commrs. v. O'Diam, 156 Ohio St.3d 458, 2019-Ohio-1676, 129 N.E.3d 393, 16... "A void judgment is no judgment at all and is without legal effect. A void judgment is a mere nullity and can be disregarded. (63 Ohio Jur. 3d Judgments Section 465, Collateral attack on judgments due to void or voidable judgments).*** **EXHIBIT 11. {Dismissal}.**

No brand new Action / Motion was filed against Petitioner to be heard on **June 9, 2017**, and since **the contempt motions, which were the "sole grounds" basis** for the reallocation of custody were **all fully withdrawn and dismissed,** the case was concluded and **there was no further jurisdiction conferred upon the trial court to then hold a custody trial in Petitioner's absence.** ***Hummel v. Sadler, 96 Ohio St.3d 84, 2002-Ohio-3605, 771 N.E.2d 853 at 22. "This is in line with the Ohio Supreme Court's statements, in the context of prohibition acts, that a court of general jurisdiction can nonetheless patently and unambiguously lack jurisdiction, "when the court seeks to take an action or provide a remedy that exceeds its statutory authority." State ex rel. Ford v. Ruehlman, 149 Ohio St.3d 34, 2016-Ohio-3529, 73 N.E.3d 396.***

None of the mandatory **O.R.C. 3109.04** factors were applied in Petitioner's custody case, which is a requirement. Sassya waited over (6) years to take the children from Petitioner and he only did so when daughter S.A.S. became old enough to babysit for free. The false allegations of parental alienation that the Magistrate, Smith, and Sassya lodged against Petitioner were maliciously fabricated so that Sassya would get full custody and never have to pay the agreed upon $ 1,800.00 per month amount. Magistrate DeLost **did not find Petitioner in contempt,** but he punitively changed custody without notice to Petitioner or her opportunity to be heard. This also violated Petitioner's **Eighth Amendment** protected right against cruel and unusual punishment which was inflicted upon her for reporting the fraud on the court, forgery on her Journal Entry, and court forced Polygamy. ***"There can be no sanction or penalty imposed upon one because of his exercise of Constitutional Rights." Sherar v. Cullen, 481 F.2d 946 (1973).***

The trial court violated Petitioner's right of Due Process by using the same **withdrawn and dismissed** false allegations against her, in her absence, in order to proceed with the pre-planned reallocation of custody to the Father (Sassya). The **First Amendment** protects Petitioner's, and her children's, reciprocal right to the freedom of expression and the freedom of association to share hugs, have meals together, and be in each other's company and learning from each other, especially that Petitioner is the safe and protective parent. ***"Due Process requires both Notice and the opportunity to be heard."... "All parents must be afforded a high level of both procedural and substantive protections." In re Thompkins, 115 Ohio St.3d 409, 2007-Ohio-5238, 875 N.E.2d 582, 13... The U.S. Supreme Court's primary holding, "Even if the government deprives an individual of property only temporarily, due process requires notice and an opportunity to be heard." Fuentes v. Shevin, 407 U.S. 67 (1972).***

On **June 9, 2017,** the trial court's recording box was turned off. For her safety, Petitioner recorded Magistrate DeLost coercing her into signing to dismiss her two week old Mahoning County Protection Order, when she refused to sign, the Magistrate had Petitioner thrown out of the building that day, in violation of ***42 U.S.C. 12203.*** The Magistrate conspired with the G.A.L. Draa, Smith and Sassya to hold a custody Hearing in Petitioner's absence, her certified transcript proves this, it also proves that she didn't just get up and leave **on her own,** she strenuously objected to the Magistrate violating her right to Due Process, and her right to be heard in proceedings where Petitioner's absolute liberty interests were at stake. ***"To take away all remedy for the enforcement of a right is to take away the right itself. But that is not within the power of the State." Poindexter v. Greenhow, 114 U.S. 270, 303 (1885).*** **EXHIBIT 12.**

The Guardian ad Litem, (Charles Draa), assigned to the case, joined the conspiracy, he did his part to ensure Petitioner would lose custody by whimsically changing his reports to conform to whatever Magistrate DeLost, Sassya, and attorney Smith wanted. As stated on **Page 5.** of Mr. Draa's report, he felt the (father) should be granted full custody so that Sassya could raise 'his' children according to 'his' customs and traditions'. This is not in the Rule Books anywhere and **it is not a reason** to support a change of custody. At this point the bad court actors were just making things up to try and justify the change in custody. Mr. Draa stated in his prior testimony that 'it would be more traumatic for Petitioner's children to have to live with their father', but then he conspired with the Magistrate, Sassya, Smith, and a retired child psychologist Dr. Harvey Kayne, who came out of retirement to accept cash only to do a custody evaluation. Dr Kayne testified that Father's actions and behaviors were contributory to Sassya losing visitation. Dr Kayne also testified that he would not support a change in custody

because it is not good for the children. Dr. Kayne stated that Parental Alienation is 'not a thing' and should not be used to change custody. **EXHIBITS 13., 14., 15.**

On **June 29, 2017,** the Magistrate forced Petitioner to appear, then told her that 'she did not have to say anything, that she was winning her claim'. The Magistrate lied and again violated Petitioner's right to be heard and her right to fully plead her case. On **August 11, 2017,** Sassya was granted full custody of all minor children while he was on supervised visits for child abuse. Petitioner was then completely **cut off** and **deprived** of all contact with her children and from all parental decision making. Petitioner has been kept away from her children for over (7) years now without any Order of visits or reunification. ***"By granting custody to the father, the state cut off the mother's "immediate right to the care, custody, management and companionship of her minor children". May v. Anderson, 345, U.S. 528, 533 (1953).*** **EXHIBIT 16. 1. - 2.** **OF NOTE :** Deborah Smith wrote the **August 11, 2017** court Order giving her client (Sassya) full custody, she designed the Order to appear as an Agreed Judgment. Magistrate DeLost adopted Smith's Agreed Judgment, copied it word for word verbatim, signed his name to it and issued it as if it was his own court Order. The very same day, Judge Harwood approved the Magistrate's repugnant decision. Two days later, Magistrate DeLost stepped down from his position as Magistrate and Sassya's attorney Deborah Smith became the new Magistrate sitting in Magistrate Raymond DeLost's seat. ***The U.S. Supreme Court holds that, "A judge's conspiring with one of the parties to predetermine the outcome of a judicial proceeding is not a judicial act". Beard v. Udall, 648 F.2d 1264, 1268 (9th Cir. 1981). " Judicial opinions are the core work-product of judges. They are more than findings of fact and conclusions of law ; they constitute the logical and analytical explanations of why the judge arrived at a specific***

conclusion. They are tangible proof to the litigants that the judge actively wrestled with their claims and arguments and made a scholarly decision based on his or her own reason and logic. When a court adopts a party's proposed opinion as its own, the court vitiates the vital purposes served by judicial opinions." Chicopee Manufacturing Corp v. Kendall Co., 288 F.2d 719, 725 (4th Cir. 1961).

The **June 29, 2017** 'custody' proceedings conflict with clearly established Law, Rules, and statutes. When the Magistrate asked the Guardian ad Litem, Charles Draa, to call Petitioner and tell her to come to court on **June 29, 2017,** the entire matter had already been concluded on **June 9, 2017** when Appellee Sassya withdrew his (3) phony contempt motions and the trial court dismissed all (3) contempt motions which were the ' sole grounds' basis for effectuating a change in custody. What the bad court actors did in this unconscionable legal abuse scheme is so bizarre and fully proves their odious intent, retaliation, bias, and prejudice against Petitioner. There is **no** custody trial even listed on the trial court's docket as ever having occurred. ***The U.S. Supreme Court holds that, "the Due Process Clause of the Fourteenth Amendment requires judges to recuse themselves not only when actual bias has been demonstrated or when the judge has an economic interest in the outcome of the case but also when "extreme facts" create a probability of bias." Caperton v. A. T. Massey Coal Co. 556 U.S. 868 (2009).***

Petitioner appealed the trial court's **August 11, 2027** change of custody Order. The Judgment Entry signed by Appellate Judge Matt Lynch in ***Case No. 2018-TR-00013*** shows that Judge Lynch joined the conspiracy and abused his position when he "Affirmed" the chicanery of the trial court. Judge Lynch wanted to present to the Public that he had this "Precedented" case of parental alienation in which he **falsely** accused and labeled Petitioner as an alienator. At **no** time has Petitioner ever been found to be

an alienator, **that unsupported allegation was completely withdrawn and dismissed on June 9, 2017** because it is rooted in lies. **The Mahoning and Trumbull County Court Orders suspended Appellee Sassya's visitation, not Petitioner. APPENDIX S. 1. - 2.**

Further, on Page. 6., of Judge Lynch's Judgment Entry, at the last sentence, he states that, "there is **no** reason to believe that the Plaintiff - Father has acted in a manner resulting in any of the children being an abused or neglected child." This is a **completely False statement.** There are two (2), five (5) year Civil Protection Orders and multiple Domestic Violence arrests issued against Appellee Sassya that prove otherwise.

Judge Lynch intentionally left the **September 13, 2016** trial court **Order** out of his ***2018 -T- 00013*** **Judgment Entry** in order to portray Petitioner to the public as a 'Sour Grapes' mom who didn't get her way in her custody trial, and so that when anyone read s or uses her case for their own, Petitioner would forever be branded unfavorably. The **September 13, 2016** trial court Order **"suspended"** fathers, (Sassya), visitation for the child abuse that was proven to be a **'Fact'** in the **Mahoning County Protection Order** ***Case # 2016 -DV- 0689,*** which clarifies that after (2) full days of hearings and evidence ; ***"For all the reasons set forth herein, this Court finds that Respondent has committed child abuse against T. S., and that Respondent has committed domestic violence by committing menacing by stalking, as defined in R.C. 2903.211."***

Further, on Page. 10., of Judge Lynch's above said **Judgment Entry,** at number **{31},** it states, **"Combining the custody and contempt issues was also reasonable in light of the fact that the grounds for the reallocation of parental rights were the " same" grounds underlying the contempt motions."** Now let's go back and read **Page. 3.** of Judge Lynch's Judgment Entry at number **{11},** where he states, **on June 9,**

2017,... "Also prior to the hearing's commencement, Sassya withdrew the pending contempt motions and the matter proceeded solely on the motion for reallocation."

Petitioner's phone recording transcripts prove that on **Page 9. at No. {30},** of his ***Case No. 2018-TR-00013*** Judgment Entry, Judge Lynch, **Falsely stated** that Petitioner just got up and left the courtroom on **June 9, 2017.** Petitioner was forcefully removed when she objected and tried to plead her side because the Magistrate became angry that he had no logical way to support the reallocation of Petitioner's children. Judge Lynch's **Judgment Entry,** also **Falsely** stated that Petitioner had denied Father (Sassya) substantial parenting time but that was already **fully withdrawn and dismissed on June 9, 2017** when the Mahoning and Trumbull County Court Orders suspended Sassya's visitation, **Not** Petitioner. Petitioner's case is littered from end to end with Bias and prejudice, the involved bad court actors are in violation of: **28 U.S.C. Section 455(a).**

Appellate Judge Lynch was slinging mud at Petitioner so that the public would read his Opinion and believe his concocted and unsupported " interference with custody' allegation aimed at Petitioner in his generalized statement on **Page 17. at number {50}** of his Judgment Entry, " interference with custody warrants a change in custody." Clearly Petitioner has **never** been found guilty, by any court, to have committed the crime of Interference with Custody. In retaliation, Judge Lynch seethingly wanted to show Petitioner that he could damage her public reputation with his lies and false allegations.

Petitioner again reached out to the U.S. Attorney's Office / Department of Justice in Cleveland, and in Youngstown, Ohio, the FBI, the Ohio Attorney General's Office, the OOCIC, members of Congress and the Senate, and hundreds of Attorneys. Petitioner was advised to file a State Court Claim in order to have her Separation Agreement Contract enforced and her Parental Rights restored. Petitioner filed her State Court Claim in the

Trumbull County Court of Common Pleas, General Division ***Case No. 2020 CV 00704,*** **on June 11, 2020,** against (12) named Defendants. After all Pleadings were closed, Petitioner's case was scheduled for a **Jury Trial** on **August 23, 2021.** The **April 5, 2021** Common Pleas Court Order reads, **No : 6. "A jury trial in this matter shall be held on August 23, 2021 at 9 :00 am;".** Petitioner was told to pay $ 5.00 each to certify every Exhibit she intended to use at trial, when she called the Clerk of Courts office to make the appointment to certify her Exhibits, she was informed that all (12) Defendants had already received ***immunity*** and ***summary judgment.*** The Final Order was issued on **April 18, 2022.** Petitioner Appealed in ***Case No. 2021 -TR- 00038.***

The Appellate Court Judge Trapp violated the 'Law of the Case' when she affirmed the Trial Court's ***Case No. 2020 CV 00704,*** **Judgment Entry** which granted summary judgment and absolute immunity to Sassya, but, the Appellate Court already ruled in ***Case No. 2013 -TR- 00084,*** **that Sassya was not entitled to a ruling of Summary judgment on the same exact issues.** Two Judges concurred with Judge Trapp and stated Petitioner cannot raise any of her issues on Appeal due to Res Judicata. Lord Res Adjudicata is the Doctrine of finality, and there is **No** finality, in this case. Petitioner has the absolute right to bring the Fraud Upon the Court before any court at any time, and the doctrine of Res Adjudicata does **Not** apply where there is "fraud or collusion". ***" III. Conclusion, "We conclude that neither the Rooker-Feldman doctrine nor res judicata prevents Long from pursuing her complaint in federal court." (Reversed and Remanded for further proceedings.) Long v. Shorebank Development Corp., 182 F.3d 548 (C.A. 7th Cir. 1999)... 63 Ohio Jur. 3d Judgments Section 355. Nature and basis of res judicata doctrine." "With respect to extrinsic fraud, the doctrine of res judicata will not shield a blameworthy defendant from the consequences of his or her own***

misconduct. Accordingly, the principles of res judicata may not be invoked to sustain fraud, and a judgment obtained by fraud or collusion may not be used as a basis for the application of the doctrine of res judicata." (63 Ohio Jur. 3d Judgments Section 378.) **APPENDIX T.**

Appellate Judge Trapp joined the conspiracy and demonstrated her bias and prejudice against Petitioner in the Appellate ***Case No. 2021-TR-00038.*** Judge Trapp abused her position to fabricate allegations against Petitioner which are largely **False** and unsupported by any facts or evidence. The Appellate Court Judges violated Petitioner's protected rights in order to cover up the trial court actors criminal acts and violations.

Further, Judge Trapp states in her Judgment Entry in ***Case No. 2021-TR-00038*** "the Appellate Court is without jurisdiction to consider Petitioner's "petitions" construed as motions to vacate all of the trial court's Orders" that are fraudulent and / or issued without jurisdiction." [**Ohio Legislator's state otherwise**], ***"The authority of a court to vacate a void judgment is not derived from Ohio's Civil Rules of Procedure, but rather an inherent power possessed by all Ohio courts. Any court, in any jurisdiction has the right to decline to recognize the validity of a void judgment of any other court". (63 Ohio Jur. 3d Judgments Section 465, Collateral attack on judgments due to void or voidable judgments).*** **APPENDIX U.**

It is appalling that Judge Trapp states in her ***2021-TR-00038*** Judgment Entry that Petitioner's Appeal, **"stems from over a decade of lengthy tortured divorce and custody proceedings".** The Paramount Question is, **Why was there, this, 'over a decade of lengthy tortured divorce and custody proceedings' to begin with, the Dissolution and Separation Agreement were done and finalized in October of 2011 ?** The Appellate Judges know very well that the, "over a decade of torturous proceedings",

stem from unlawful proceedings that abused and harassed Petitioner in over (14) years of vexatiuos protracted litigation due to Petitioner's, (unresolved), Dissolution and Separation Agreement being unlawfully vacated by way of a criminal act of felony forgery on the trial court's June 13, 2012 Journal Entry, and from the unlawful seizure of her children as a cruel and unusual punishment for reporting the bad court actors said criminal acts which violates Petitioner's Constitutionally protected **8th Amendment right.**

On **Page {3}** of Judge Trapp's **April 18, 2022, 'OPIONION',** she states, **"Two people, once joyously joined as one, produce children who are the special creation of that union."...** Those words uttered by Judge Trapp are extra - judicial and highly unethical. Judge Trapp objectionably touts how 'emotionally painful parental rights cases can be' as she paints a muddied picture of Petitioner and her parenting. This Appeal in ***Case No. 2021 -TR- 00038*** pertains to the case Petitioner filed in the General Division in the Trial Court in Trumbull County, ***Case No. 2020 CV 00704,*** on **June 11, 2020.**

It is very telling that the said Appellate Court can ingloriously admit that Petitioner suffered through over a decade of torturous court proceedings, while they clearly took part in the torture. If the Courts had acted ***'obsta principiis'*** from the inception when the trial court, and its officers, committed criminal acts of felony forgery on the **June 13, 2012** Journal Entry, and committed court ordered polygamy in Petitioner's case, there wouldn't be the need for {14} years of lengthy and torturous proceedings. The above mentioned Courts have all failed in their duty to protect Morgan's Constitutional rights.

Months after Sassya got full custody, he finally allowed Petitioner to see her children, the children right away showed mom the horrible human bite marks that Sassya did to them. Petitioner reported it to the police as she is required to do by State and Federal Law. The police told Petitioner to take her children to get medical attention

immediately then find a safe place to go and stay there until Sassya was arrested. Sassya was not arrested for his crimes because his current attorney Elise Burkey, who also joined in the conspiracy to deprive Petitioner of her protected rights, concealed information from the court that Sassya had seriously harmed the parties minor children. Ms. Burkey also concealed the fact that the police had told Petitioner to take the kids to safety. Ms. Burkey knowingly falsely presented to the court that Petitioner had simply taken off with the children, **Girard City Court found Burkey's allegation to be False.**

On **April 12, 2018,** a "Show Cause" motion was filed against (Sassya) for harming Petitioner's minor children and for unlawfully **keeping Petitioner separated from her minor children 98% of the time** after he unlawfully gained custody. **EXHIBIT 17.**

Petitioner called police dispatch for further instructions and disclosed her location, later that day, Sassya had a different police department falsely arrest Petitioner for taking her children to safety and protecting them as the first police department told her to do. Sassya's attorney Elise Burkey interfered in Petitioner's Girard City Court case and filed to Quash the children's testimony so that Petitioner and her children would be silenced about the well documented physical abuse and the horrible human bite marks. **Girard City, Ohio** Judge Jeffrey Adler **denied** Burkey's Motion to Quash because he wanted to hear what the children had to say. After seeing the photos of the Human bite marks that Sassya did to the parties children, and after the Police testified in (3) different Courts supporting Petitioner, Judge Adler demanded that the charges against Petitioner be immediately dismissed. Petitioner was fully vindicated. **EXHIBIT 18. & 19. & 20.**

On **May 15, 2018,** the entire Trumbull County trial court recused themselves. A retired visiting judge, Joseph Giulitto, now (90) years old, was **'temporarily assigned'** to Petitioner's case to hear **'only'** the **April 12, 2018** "Show Cause" motion that was filed

against the Father (Sassya) for harming Morgan's minor children, and for keeping the children from her. Joseph Giulitto harassed Morgan and joined in on the conspiracy.

On **May 30, 2018,** the former judge Giulitto held a 'Status Hearing', all parties and their attorneys are required to be present and sign to the terms of an **Agreed Journal Entry** which is binding on all future hearings. Petitioner appeared but was intentionally excluded from the Status Hearing, Sassya was a no-show. There was **no** Agreed Judgment signed, thus, Petitioner should have prevailed by default. Instead, she was forced to sit on a bench in the lobby while Joseph Giulitto, Elise Burkey, **Michael Partlow,** and Charles Draa conspired to inflict a punishment on Petitioner for reporting the human bite marks and beatings that Sassya did to her minor children. Petitioner was only allowed to see her children for (2) hours, one day a week, in supervised visits.

Supervised visitation is only for a parent who has / had criminal charges, or drug and alcohol related issues, or for a parent who is abusive. Petitioner has no criminal history, she has never done drugs nor drank any alcoholic beverages, and she has never harmed anyone. **Girard City Judge Adler** already ruled in Petitioner's favor and Dismissed the case, thus, **City of Warren Joseph Giulitto** had no jurisdiction to punish Petitioner for the exact same thing. ***62 Ohio Jur. 3d Judgments Section 98, at No. 17. ; "A judgment is void only where the court lacks jurisdiction ; of the subject matter ; or of the parties ; or where the court acts in a manner contrary to due process."***

The **July 24, 2018,** trial court transcripts prove that Joseph Giulitto began a trial to hear the **April 12, 2018** "Show Cause" motion filed against Sassya. Sassya was found in contempt but received no punishment for his crimes. The case was then concluded because the retired visiting judge had completed his temporary assignment. However, Joseph Giulitto decided, in mid- hearing, that he didn't want to conclude his assignment,

he wanted to remain on the case so he turned the tables onto Petitioner and punished her for not **'calling up her ex-husband and asking him why he bit her children'** then she, 'Morgan' was to make sure that Sassya never bit the children again.' Joseph Guilitto remained on Petitioner's case for over (7) years to supposedly **'help repair the relationship between the parties'** which is outside the scope of his already unlawful temporary assignment, and it was done under color of Law for it violated Petitioner's Protection Order against Sassya by forcing her to have dangerous face-off's with Sassya, a known violent offender, and it violated Petitioner's right to Due Process. The **August 3, 2018** Order is **"Void"** due to lack of **"Notice"** to Petitioner that Joseph Giulitto would begin proceedings against **her** during a "Show Cause" motion hearing that was filed only against Sassya. ***"A judge who manifests bias or prejudice in a proceeding impairs the fairness of the proceeding and brings the judiciary into disrepute." Ohio Jud. Cond. R. 2.3 (D)(1).*** **EXHIBIT 21. Bench Ruling is unalike the 8/3/2018 Order.**

On **January 14, 2019,** Petitioner filed a **Motion 60 B. (3)(5),** into the trial court, and into the Appellate Court, she tried to put a stop to the **ongoing** fraud upon the court and violations of her constitutionally protected right of Due Process of Law after the Courts were refusing to provide her a with a remedy. The Appellate Court simply wrote "VOID" on Petitioner's **Motion 60 B. (3)(5)** and sent it back to her.

On **February 12, 2019,** Petitioner received Notice for a Hearing to address the **August 3, 2018** issues **only**, when Petitioner appeared, Joseph Guilitto decided he would also address the **Motion 60. B. (3)(5) without prior Notice** to Petitioner. The **February 25, 2019** court Order is mostly unintelligible. Petitioner is both the Plaintiff and the Defendant in each paragraph, and so is Sassya. The said Order doesn't even have the names right on its face, but Mr. Giulitto said on **Page 4.** that, **"Valid attorney's**

signature are required on a Judgment Entry when such an Entry is reflective of any agreement of parties intended to be offered to the Court", he then Dismissed Petitioner's **Motion 60. B. (3)(5),** and costs were assessed to whomever the Defendant may be. Petitioner filed to move her case due to fraud on the court. **APPENDIX V.**

Joseph Giulitto stays on Petitioner's case to give Sassya full authority over when and if Petitioner ever gets to see her minor children, he made sure to keep her minor children separated from her without any hope of reunification unless Sassya allows it.

The former trial court, prior to their **May 15, 2018 entire Court recusal,** issued an "Ex Parte" Order on **October 24, 2017** for the safety and well-being of the parties minor children so that Father (Sassya) could not remove the minor children from the Continental United States upon realizing that Sassya had recently been granted full custody and intended to take the children to Lebanon. Mother was born and raised in the United States, she is not a criminal nor an abuser of any kind, Mother is not a risk factor. On the other hand, Father was born and raised in the country of Lebanon, he is a substantiated abuser, and he has no other family or relatives in the United States.

The **October 24, 2017** Ex Parte Order was signed by Magistrate Bombeck, and approved by the Judge the same day. The said Order, (not a true Ex Parte), was then handed to both parties who were already at the Administrative Building while the document was prepared and signed. A true copy was mailed to all parties. Neither party filed objections, nor an appeal of the **October 24, 2017 Order. APPENDIX W.**

The (90) year old retired judge Joseph Giulitto, first tried to vacate the **October 24, 2017** Order as a favor to Sassya, but he could not legally do it, so he permitted the said Order to be Modified so that Sassya could take Petitioner's minor children to Lebanon. Joseph Giulitto knew well of the dangers that Sassya might not return to the

United States with Petitioner's minor children, and he also knew that Lebanon has been an all out **LEVEL – 4, "DO NOT GO"** hot war zone for quite some time, and still is currently. Petitioner presented to the retired judge the official warnings that the U.S. State Department issued and sent to her. Joseph Giulitto made it appear that his **June 14, 2023** Order was non-biased by permitting both parties to leave the United States with the minor children. However, Sassya won't even allow Petitioner to pick up her children for a pizza on a Thursday, or for a weekend sleep over with mom, or for a shopping trip, or even a summer week vacation to the beach, but, by 'court' Order, and without any visitation Order in place, Petitioner can freely, on a whim, just pick up her children and leave the country with them to any place, at any time ?, that makes Zero sense.

Petitioner Appealed the retired judge's extremely dangerous **June 14, 2023** Judgment Entry which was issued in complete **lack of jurisdiction.** On **March 22, 2019,** Petitioner filed a Motion 60 B. (3)(5) against Joseph Giulitto for committing fraud on the court to which he vacated his **June 13, 2018** court Order. The **June 14, 2023** Order was solely for Sassya's benefit, Sassya doesn't even allow Petitioner to see her children for many months at a time, and once inside Lebanon, which has no treaty with the United States, Sassya will use his Lebanese passport and Lebanese law to keep Petitioner's minor children in Lebanon which would further deprive Petitioner of her fundamental liberty interest and Constitutionally protected right to parent her children. **APPENDIX X.**

On **April 9, 2024,** the Appellate Court caused an unconscionable and detrimental **Error** when it affirmed Joseph Giulitto's **June 14, 2024 Judgment Entry.** The same bias Appellate Judge Lynch also presided over this appeal and stated in his **April 9, 2024** Judgment Entry on **Page 6. at No. 13.** that, **"We further note that the original Order (October 24, 2017) was issued without evidence being submitted to justify its**

issuance and without opportunity for Sassya to oppose its issuance." Judge Lynch's statement is **False** for it indicates that the **October 24, 2017, Ex Parte Order** that prohibited father to take the minor children to Lebanon, somehow violated Appellee Sassya's due process rights, yet, in the **APRIL 20, 2023** transcripts, **THE COURT** : stated to Sassya, **"And you had time to file objections to it and so on, which nothing was done. But anyway you are withdrawing the Motion ?** Elise Burkey admitted, **"her client was served with the October 24, 2017 court Order and could have timely filed Objections or an Appeal to the said Order",** however, Sassya made the conscious choice not to, and that time has passed. **EXHIBIT 22.**

Joseph Giulitto took over where the recused trial court left off, he repeatedly violated Petitioner's constitutionally protected right to parent her children without cause. His Orders kept Petitioner's children away from her after they were wrongfully, and also without cause, removed from her custody mostly in retaliation for Petitioner voicing the criminal acts committed by officers of the courts, and partly in retaliation so that Sassya would not have to pay the $1,800.00 per month amount, both of these said factors prove retaliatory action committed by officers of the court. ***"The Law is well settled that as a general matter the First Amendment prohibits government officials from subjecting an individual to retaliatory actions... for speaking out." Hartman v. Moore, 547 U.S. 250 (2006);... City of Houston v. Hill, 482 U.S. 451, 461 (1987);...."The Law clearly establishes a right to be free of "intentional and calculated acts of retaliation [by a government actor]." Anderson v. Creighton, 483 U.S. 635, 639 (1987).*** Petitioner filed three separate Motions for Disqualification against the former judge Giulitto, each Motion was denied by the Ohio Supreme Court and their Disciplinary Counsel. The harm Joseph

Giulitto is doing, or has done to Petitioner, gets quashed, so he knows he won't be held accountable for he is Not a judge anymore, and he believes he is "above the Law."

The Court officials in Petitioner's case could **Not** in any way articulate any serious, or even significant, or any allegations at all that would warrant the reallocation of Petitioner's minor children and the unlawful separation that is ongoing without any Order for reunification. The bad court actors broke the mother child bond and are waiting for the children to age so that their sham legal process game would be over and they don't care about Petitioner's protected rights because they already made their money off of Petitioner's case. All of the State and Federal bad court actors, including the former judge Joseph Giulitto violated clearly established Laws and unlawfully accepted emoluments in exchange for fraudulent and unconscionable court Orders issued in complete lack of jurisdiction. The trial court jumped ship and recused themselves to avoid prosecution but left Joseph Giulitto to remain on Petitioner's case to continue the cruelty and sham. He refuses to recuse himself which is self-executing **28 U.S.C. 455(a).**

"For a right to be clearly established, existing precedent must have placed the statutory or constitutional question beyond debate," though there need not be "a case directly on point." Kisela v. Hughes, 138 S. Ct. 1148, 1152 (2018).. "Existing case law must "demonstrate that the contours of [the] right were sufficiently clear such that 'any reasonable official in [his] shoes would have understood that he was violating it." Hope v. Pelzer, 536 U.S. 730, 741 (2002)..... "Parents have a fundamental right to control the upbringing of their children, the Due Process clause does not permit a state to infringe on the fundamental right of parents to make childrearing decisions simply because a state judge believes a 'better' decision could be made." Troxel v. Granville (2000) 530 U.S. 57, 72 - 3. 1st Amendment freedom of expression /association.

REASONS FOR GRANTING THE APPEAL AND PETITION FOR WRIT OF CERTIORARI

Petitioner asserts that her case is one of unique circumstances that are shocking to the conscience and presents a crystal clear justiciable controversy. The elements of Extrinsic Fraud on the Court, tampering with records, systemic collusion, polygamy, retaliation, harassment, public corruption, cruel and unusual punishment, and conspiracy to commit deprivations of Petitioner's Constitutionally protected rights, make this case ripe for Federal review. Petitioner has repeatedly been denied all State and Federal remedy, thus, warranting the U.S. Supreme Court's review. The lower Court's actions and decisions conflict with clearly established Law and precedent, and delineate issues of national importance. The lower Courts are implementing the fraudulent Judgments of Petitioner's, case in their own Judgments, which puts the General Public at risk, this risk must be eliminated. **If there is No Remedy within the Law, then there is no Law.**

CONCLUSION

Petitioner urges this Court to grant her Appeal and Writ of Certiorari to correct the injustices and uphold the rule of Law. Petitioner prays this Court will use its inherent power to intervene in this extraordinary case and Vacate every void Judgment ; and grant Petitioner Injunctive Relief, Punitive Damages, Declaratory Relief, Compensatory Damages in an amount not less than $14,000.000.00, and the return of all Attorney's Fees, and Court Costs ; and for any other relief this Honorable Court deems necessary and appropriate to make Petitioner whole again in Law and Equity.

{ All Costs and Fees Shall Be Taxed To The Appellee Sassya and To Any Other Individuals this Honorable United States Supreme Court Should Hold Accountable. }

Respectfully Submitted,

C. Lynne Morgan