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IN THE
SUPREME COURT OF THE UNITED STATES

Margaret Bach - PETITIONER

vs.

Circuit Court for Milwaukee County - RESPONDENTS

ON PETITION FOR A WRIT OF CERTIORARI TO

Wisconsin Supreme Court

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Can a circuit court hide evidence of their misconduct by forging transcripts and denying discovery?
2. Should a higher court investigate when a party alleges a conspiracy with a proof of lies in the transcripts, and the possibility transcripts have been forged?
3. Can a court charge an indigent, aggrieved party a cost to challenge an illegal order violating their constitutional rights and sending them to jail?

LIST OF PARTIES

All parties involved in this Office of Lawyer Regulation case do not appear in the caption of the case on the cover page. The parties also include:

Judge David Borowski
Court Reporter Carol Serota-Bodi
Milwaukee County

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IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the
judgment below.

OPINIONS BELOW

The opinion of the Wisconsin Supreme Court appears at Appendix 1 to the
petition.

JURISDICTION

The date on which the Wisconsin Supreme Court decided my case was
September 11, 2017. The jurisdiction of this Court is invoked under 28
U.S.C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

First Amendment

Congress shall make no law respecting an establishment of religion, or
prohibiting the free exercise thereof; or abridging the freedom of speech, or of
the press; or the right of the people peaceably to assemble, and to petition the
government for a redress of grievances.

Eighth Amendment

Excessive bail shall not be required, nor excessive fines imposed, nor cruel
and unusual punishments inflicted.

Ninth Amendment

The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.

Fourteenth Amendment

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Americans With Disabilities Act of 1990 (ADA)

The ADA prohibits discrimination on the basis of disability in employment, State and local government, public accommodations, commercial facilities, transportation, and telecommunications.

Title II requires that State and local governments give people with disabilities an equal opportunity to benefit from all of their programs, services, and activities (e.g. public education, employment, transportation, recreation, health care, social services, courts, voting, and town meetings).

Rehabilitation Act of 1973, Section 504

The Rehabilitation Act prohibits discrimination on the basis of disability in programs conducted by Federal agencies, in programs receiving Federal financial assistance, in Federal employment, and in the employment

practices of Federal contractors. Section 504 states that "no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under" any program or activity that either receives Federal financial assistance or is conducted by any Executive agency or the United States Postal Service.

42 U.S.C. § 1983

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress.

STATEMENT OF THE CASE

This is a case of a disabled child with a rare brain tumor, whose mother has fought Milwaukee County for years to ensure his safety. Each year the injustice and harm increase. Numerous examples of judicial estoppel by judges, guardian ad litem, adversary counsel attorneys, and the guardian's attorney are evidence of corruption and conspiracy.

Judge Flanagan took Margaret Bach's guardianship away because she deemed AB unsafe with less than 3 staff, and Bach could only get 2 staff approved by Milwaukee County. Now AB is often alone, and has only one

staff. Judge Flanagan assumed a corporate guardian would work more agreeably with Milwaukee County to ensure AB's safety.

The opposite happened. The corporate guardian chosen by Milwaukee County took AB from his home with no notice as required by state and federal law; reduced his care; sent him to a mental institution when he has a brain tumor, not a mental disorder for a long 3 years even after Judge Carroll said he should not stay there longer than 6 months; and harm increased for AB and those around him. AB was denied visits and phone calls. His rich life of daily outings and time with family ended. He has less community integration in much more restrictive placements. His aggressive incidents increased 21 fold. He needed urgent brain surgery after increased falls being left alone regularly; he bit a man's ear off; he ran away missing for several hours; and had several broken bones. None of these dangers happened while AB lived at home with his mother.

AB loves his mother, and desperately wants to see her and speak to her. In November 2015 he asked to call his mother to ask how old she was because he said he was afraid she would die before he was allowed to see her again. The group home and guardian rules, supported by illegal court orders, would not let AB call his mother. So he ripped off his fingernail, after his staff left him alone. Nothing has been done to prevent this painful injury from recurring, or any of the dangers listed above.

With no higher court intervention, the injustice has grown now with forged transcripts. Bach ordered transcripts from Judge Borowski's court reporter, Carol Serota-Bodi for hearings held 2-9-16, 5-12-16, 9-20-16, and 2-21-17. Bach recognized numerous errors and spoke to Carol Serota-Bodi about it, but she denied any errors. The most striking omission was a moment Bach will never forget: Judge Borowski stated on 2-9-16 that it was wrong they had not let her see her son in 3 years. He did not give Bach eye contact. He looked down at his desk and spoke in an oddly solemn, sympathetic, embarrassed tone. Bach will never forget that statement and the significance it had for her case. She even brought it up in subsequent hearings asking Judge Borowski how he could sign an order to prevent her from ever seeing her son again when he had earlier said the past deprivation was wrong. He never denied he made the past statement or explained the contradiction.

It is unlikely any court reporter would take it upon themselves to risk their career by changing the transcripts they have a duty to report accurately. Bach did notice an unusually friendly relationship between Judge Borowski and his court reporter in the past. The missing statements Bach is aware of would have helped her on appeal.

Another error Bach noted was the adversary counsel waived her son's appearance at the hearing 2-21-17, but the transcript reflected the guardian ad litem, ("GAL") attorney had. Adversary counsel Reed Martin argued to

the Office of Lawyer Regulation that he knew only the GAL could waive AB's appearance, so had not done so 2-21-17. Yet in the hearing 1-9-18 he waived AB's appearance when there was no GAL there, even though it was undisputed in the record that AB wanted to be there and had participated meaningfully at other hearings.

In comparing Bach's notes and memory to the transcripts she found numerous errors, as if the court reporter printed out the real transcripts and the judge went through them striking what he didn't want anyone to see. Bach filed a motion under Wis. Stat. § 809.51 for a supervisory writ to correct the injustice: void the illegal orders, order a new unbiased judge outside Milwaukee County, and order an examination of the transcripts.

Bach spoke to an expert in court reporting who founded Gramann Reporting in Milwaukee. He said the original reporting done is always preserved, but the difficulty is each court reporter often develops their own unique shortcuts. He recommended to do what is done when a court reporter dies and has not yet transcribed his or her notes. They bring in 2-3 unbiased court reporters and between them they can always rebuild the correct original transcript.

Bach asked the Wisconsin Supreme Court to order this be done immediately and prevent further injustice with another hearing pending before Judge Borowski 9-8-17. But they refused to do so calling Bach's motion "baseless allegations". So at the hearing on 9-8-17 Judge Borowski

was visibly upset over Bach's allegations and sent her to jail. (Contempt Order in Appendix 5)

REASONS FOR GRANTING REVIEW

I. Corruption In The Courts Must Be Investigated

This is a serious allegation reflecting upon a serious corruption of the judiciary. Bach does not make it lightly. The FBI uncovered serious corruption of numerous judges in Chicago not long ago. It happens. It must be addressed. The courts have a "duty and inherit power to preserve the integrity of the judicial system, to ensure and if necessary to provide at public expense adequate legal representation, and to oversee the orderly and efficient administration of justice." State ex rel. Friedrich v. Circuit Court For Dane County, 192 Wis.2d 1,10, 531 N.W.2d 32 (1995). "Bias or prejudice of a judge as to the parties constitutes in the law a disability of such judge for the discharge of his duties." Eccles v. Free High School Dist. Of City of Kaukauna, 162 Wis. 162, 155 N.W. 957, 958 (1916). "But as Schuette also said, '[t]he freedom secured by the Constitution consists, in one of its essential dimensions, of the right of the individual not to be injured by the unlawful exercise of governmental power.'" Obergefell et al. v. Hodges, 135 S.Ct. 2071 (2015) "Court retains an independent constitutional duty to review factual findings where constitutional rights are at stake." Whole Woman's Health v. Hellerstedt, 136 S. Ct. 2292, 2310 (2016), Citing Gonzales v. Carhart, 550 U.S. 124, (2007).

The United States Supreme Court should take jurisdiction because this serious infraction deserves their immediate attention. No lower court has addressed the ongoing corruption for years. With the recent decision against Bach in St. Vincent's Hospital, 2015AP1221 requiring Bach to pay \$24,000 in fees they know she cannot afford before being able to file anything further in circuit or appellate court, Judge Borowski and his court reporter likely felt bolder in their action. (Appendix 2) It must stop.

As Justice Brandies stated, "If we desire respect for the law, we must first make the law respectable."

II. No Party May Hide Relevant Evidence

Denying Bach access to the real transcripts by having a review done by other court reporters, denies her the exculpatory evidence she is due under Brady v. Maryland, 373 U.S. 83 (1963). She already went to jail once because of it with no chance to appeal based on past orders by this court.

In Brady, this Court held "that the suppression by the prosecution of evidence favorable to an accused upon request violates due process where the evidence is material either to guilt or to punishment, irrespective of the good faith or bad faith of the prosecution." 373 U. S., at 87. We have since held that the duty to disclose such evidence is applicable even though there has been no request by the accused, United States v. Agurs, 427 U. S. 97, 107 (1976), and that the duty encompasses impeachment evidence as well as exculpatory evidence, United States v. Bagley, 473 U. S. 667, 676 (1985). Such evidence is material "if there is a reasonable probability that, had the evidence been disclosed to the defense, the result of the proceeding would have been different." Id., at 682;

see also Kyles v. Whitley, 514 U. S. 419, 433-434 (1995). Moreover, the rule encompasses evidence "known only to police investigators and not to the prosecutor." *Id.*, at 438. In order to comply with Brady, therefore, "the individual prosecutor has a duty to learn of any favorable evidence known to the others acting on the government's behalf in this case, including the police." Kyles, 514 U. S., at 437.

Strickler v. Greene, 527 U.S. 263, 280-81 (1999)

All relevant evidence must be admitted under Wis. Stat. § 904.02. The real transcripts are relevant and prove Bach was right in accusing the court of corruption. "Section 901.03 provides that error may not be predicated on a ruling that admits or excludes evidence "unless a substantial right of the party is affected."'" Martindale v. Ripp, 2001 WI 113, ¶ 29-32, 246 Wis.2d 67, 629 N.W.2d 698. Bach had substantial rights at risk: her ability to see and speak to her son, her right to access the courts, and her very life and liberty. For after Judge Borowski sent her to jail she had to go 18 hours without food and water, and 24 hours without medication in solitary where she passed out. She could have died. (See note from her physician, Appendix 9)

Rules of evidence take on an increased importance in cases like this where a liberty interest is at stake. In the Matter of the Guardianship of R.S., 162 Wis.2d 197, 210, 470 N.W.2d 260 (1991).

The evidence is right there proving Bach is right, she is just denied access to it. The party at risk of losing his career and reputation, Judge Borowski, is preventing Bach from accessing this relevant evidence. This cannot stand. "It is desirable that criminals should be detected, and to that

end that all available evidence should be used.” Olmstead v. United States, 277 U.S. 438, 470 (1928). Judges can be criminals too. They are not above the law.

III. The Evidence Was Sufficient To Warrant Investigation

A. Integrity Of Accuser

Bach has never lied to the court, as all other parties have. She has sacrificed greatly to keep her son safe losing her 401K, all savings and pensions, needing multiple surgeries, and indescribable emotional pain. One Milwaukee County physician even held Bach against her will afraid she would harm herself because the facts of this case she had endured were “beyond what a reasonable person could bear”.

Bach is an attorney and as such remembers her oath to always be truthful and follow the laws, and has always done so. SCR 40.15

Bach has a good memory with neuropsychological testing after a fall from a horse placing her memory in the top 2% nationally. She takes copious notes at each hearing with her son’s life in the balance. Her written notes and memory should have been sufficient to prompt an investigation of her serious allegation that transcripts were forged.

B. Court History of Illegal Orders

There is no precedent to support this cruel over 4-year deprivation of a mother and child’s right to see each other. Guidelines in Appendix 7 and Judge Borowski Orders in Appendix 3-4.

The integrity of the family unit has found protection in the Due Process Clause of the Fourteenth Amendment, Meyer v. Nebraska, supra, at 399, the Equal Protection Clause of the Fourteenth Amendment, Skinner v. Oklahoma, supra, at 541, and the Ninth Amendment, Griswold v. Connecticut, 381 U. S. 479, 496 (1965) (Goldberg, J., concurring).

Kovacs v. Cooper, 336 U. S. 77, 95 (1949)

A father thought to be abusing his child was ordered by the court to be allowed visitation. Kristi L.M. v. Dennis E.M., 2007 WI 85, ¶ 17, 734 N.W.2d 375.

Even North Korea allowed a mother more. Kenneth Bae was arrested in North Korea in November 2012, but they recognized a mother's right to see her son, and a prisoner's right to visitors by allowing three visits in July 2013. CNN reported,

As a mother, I worry endlessly about his health," said his mother Myunghee Bae in a videotaped statement. "I want to see him, comfort him and hold him in prison. I miss him so much. It's hard to describe the agony of the past year since my son has been imprisoned in the DPRK, she said in a released statement. I spend every day thinking about him and praying for his homecoming.

www.cnn.com/2013/10/11/world/asia/bae

Bach asks this court to show the same humanity North Korea affords their prisoners.

No government interest has been alleged; there has been no mention of the benefits the government gains, or if they are narrowly tailored and tied to

the restrictions on Bach and AB's right to free speech and freedom of association. And no sufficient evidence produced to support this continued cruel deprivation. Had AB been in a North Korea prison Bach would have seen her son 3 times a year, but in a Wisconsin group home she is denied all visits for over 4 years. Something is very wrong. The United States Supreme Court must address this injustice and violation of basic civil rights.

The court order from 11-2-6 states "Ms. Bach shall refrain from discussing with AB any court proceedings and shall not suggest to AB that any action taken by the Court, Life Navigators, or any other person constitutes a violation of the law." This is outrageous. It violates Bach's right to free speech under the First Amendment, her duty as an attorney under SCR 40.15, and gives immunity to those violating the law. No court order can violate the law, but this order makes allowances for that anticipated fact.

At the 2-21-17 hearing, Judge Borowski denied Bach and AB had a right to see and speak to each other by changing the facts, stating many adult children may decide not to speak to their parents. (Trans. 2-21-17, p. 17-19) Bach pointed out their facts are different for AB functions as a second grader and desperately wants to see and speak to his mother. (Id. at 17) There is no precedent to deny a disabled child from seeing and speaking to his mother, as this court has done for over 4 years now.

At the hearing 9-20-16, Bach asked: “ I’d like to know what the reason would be why I can’t see my son. It’s been over three years. There have been no reported incidents from any witness that I’ve ever upset him.” (Trans. 9-20-16, p. 7) Judge Borowski responded, “ The best way for this to move forward is you continue to comply with my orders; don’t trump up false narratives, don’t appeal for no reason, don’t waste the time of the Court of Appeals, don’t file 300 page briefs with this Court, comply with this Court’s Orders. The attorney for Life Navigators said that you had been complying” (Trans. 9-20-16, p. 9). This proves the court retaliated against Bach for filing a 300 page brief, which violates no local rule or statute, and appealing, which is her right under Wis. Stat. § 808.03(1), Wis. Stat. § 809.30, Wis. Stat. § 51.13(5), Wis. Stat. § 813.025(1), and Wis. Stat. § 940.285.

“Retaliation against an individual for filing a complaint violated his access to the courts, subsumed under the First Amendment right to petition the government for redress of grievances, and was actionable under 42 U.S.C. § 1983 and the First Amendment.” Soranno’s Gasco, Inc. v. Morgan, 874 F.2d 1310, 1314 (9th Cir. 1989). “Any deprivation under color of law that is likely to deter the exercise of free speech. . . is actionable.” Powers v. Summers, 226 F.3d 815, 820 (7th Cir. 2004). “[A]ccess to the courts is an entitlement or a necessity.” Logan v. Zimmerman Brush Co. at 1154. 455 U.S. 422, 429 (1982).

Our country and state place a great value on free speech. The First Amendment of the United States Constitution states bluntly: "Congress shall make no law . . . abridging the freedom of speech." State v. Mitchell, 169 Wis.2d 153, 163-64, 485 N.W.2d 807 (1992).

Bach has a constitutional right to see her son, who functions at the 2nd grade level. "The Courts of Appeals for the Seventh and Tenth Circuits have recognized the parental liberty interest." Cited in McCurdy v. Dodd, 352 F.3d 820, 825 (3rd Cir. 2003). The Due Process Clause extends to a parent's interest in the companionship of his child as long as the child does not assume that critical decision-making responsibility for himself or herself. (Id. at 829)

Wisconsin provides special protections for parents before taking their parental rights under Wis. Stat. § 48, which no guardianship proceeding can ignore. "Parents . . . require heightened legal safeguards to prevent erroneous decisions." Dane Cnty. DHS v. Mable K., 2013 WI 28, ¶ 60, 346 Wis.2d 396, 828 N.W.2d 198. "Stanley was entitled to a hearing on his fitness as a parent before his children were taken from him and that, by denying him a hearing and extending it to all other parents whose custody of their children is challenged, the State denied Stanley the equal protection of the laws guaranteed by the Fourteenth Amendment." Stanley v. Illinois, 405 U.S. 645, 649, 92 S.Ct. 1208, 31 L.Ed.2d 551 (1972)

Bach never got these protections of a jury trial, fact-finding hearings, etc. but the affect is the same – she has not been allowed to see her son for over 4 years, with only very limited phone calls. (3 calls allowed in 2016)

The order from 2-21-17 denied Bach her right to free speech by ordering she could not make any disparaging comments about parties like the guardian, group home, etc. This violates her right to free speech and numerous state law protections/duties. Bach has discussed with AB she was writing a book to gain justice for them since the courts have denied them, and he agreed it was a good idea. This order makes it illegal for Bach to write the truth about her and AB's story in a book. This cannot happen in the United States of America.

Any court order must list what the consequence is for violating it, but this order from the 2-21-17 hearing does not. "The due process clause of the Fourteenth amendment requires at least a fair and adequate warning by court rule or notice of the imposition of the sanctions or penalties to be invoked for failure to comply with a court order." Neylan v. Vorwald, 121 Wis.2d 481, 489-490, 360 N.W.2d 537 (Ct. App. 1984). "Judgments entered contrary to due process are void." (Id. at 488, Citing Wengerd v. Rinehart, 114 Wis.2d 575, 587, 338 N.W.2d 861, 868 (Ct. App. 1983).

AB is protected by the Patient Bill of Rights in Wisconsin, which also allows protections to his loved ones affected by a violation of his rights. Wis. Stat. § 51.13(5) states, "any person who is aggrieved by a determination or

order under this section and who is directly affected thereby may appeal.”

There can be no debate Bach is aggrieved, not being able to see and speak to her son. Wisconsin’s Patient Bill of Rights guarantees AB:

- Prompt and adequate treatment appropriate for his condition. Wis. Stat. § 51.61(1)(f)
- Reasonable access to a telephone. Wis. Stat. § 51.61(1)(p)
- Be permitted visitors each day. Wis. Stat. § 51.61(1)(t)
- To send and receive sealed mail. Wis. Stat. § 51.51(1)(cm)
- To be free from unnecessary or extensive medication at any time . . . medication may not be used as punishment, for the convenience of staff.” Wis. Stat. § 51.61(1)(h)

Judge Borowski’s orders have denied AB all of these rights, but the legislature has determined Bach has a right to appeal these violations that affect her, which no court can overrule.

Federal Law must be adhered to. No judge can overrule the law, and it provides AB must have the most community integration in the least restrictive placement. AB does not have this. “In the Americans with Disabilities Act of 1990 (ADA), Congress described the isolation and segregation of individuals with disabilities as a serious and pervasive form of discrimination.” 42 U.S.C. § 12101(a)(2), (5). Title II of the ADA, which proscribes discrimination in the provision of public services, specifies, *inter alia*, that no qualified individual with a disability shall ‘by reason of such disability’, be excluded from participation in, or be denied benefits of, a public entity’s services, programs, or activities. § 12132. A public entity is required

to administer . . . programs . . . in the most integrated setting appropriate to the needs of qualified individuals with disabilities. 28 CFR § 35.130(d).”

Olmstead v. L.C., 138 F.3d 893, 527 U.S. 581 (1999).

AB was out in the community much more while in his home and never bit anyone’s ear off or ran away missing for hours as has happened since AB was taken from his home and had his care reduced.

This is just some of the court history in this case, which support Bach’s allegations of corruption, conspiracy, and forging of transcripts.

C. Conspiracy Seen With Lies By The Judge, Corporation Counsel, Guardian ad Litem, Adversary Counsel, And Guardian’s Attorney

Judge Borowski stated, “Judge Carroll, again, as I recall, basically barred Ms. Bach from seeing AB, justifiably at the time, probably correctly . . . correct me if I’m wrong, anybody.” (Trans. 2-21-17, p. 15-16) Then he got confirmation from every party: Lynn Wagner with Life Navigators; Attorney Meylink, AB’s GAL; Attorney Blise for Life Navigators; Attorney Reed Martin, AB’s Adversary Counsel; and Attorney Dewey Martin as Corporation Counsel for Milwaukee County. (Id. at 16) But the truth is Bach was never barred from seeing her son until Judge Borowski’s orders. In fact on 2-9-16 Attorney McGinnity, Attorney Blise’s colleague stated, “It did not bar her altogether from seeing or talking to AB, but setting restrictions”. (Trans. 2-9-16, p. 11) Every attorney has therefore, demonstrated they are corrupt, willing to agree with anything Judge Borowski says regardless of their legal

duty to argue AB's best interests as Attorney Meylink must, or AB's wishes as Attorney Reed Martin must, or answer honestly as every attorney must. These transcripts are not in dispute and support Bach's allegations of conspiracy, corruption, and forged transcripts.

"[A]n unlawful combination and agreement becomes a positive crime only when some of the proved conspirators enter the field of action pursuant to the criminal design." Yates v. United States, 354 U.S. 298, 77 S.Ct. 1064 (1957). All parties cited above are guilty of this positive crime.

IV. No Court Can Impose High Fees Restricting An Indigent.
Aggrieved Party From Accessing The Courts.

The Wisconsin Supreme Court fined Bach \$195 for filing a motion under Wis. Stat. § 809.51 because they considered it without merit, despite the undisputed evidence Bach is indigent and her liberty is at risk.

There can be no equal justice where the kind of trial a man gets depends on the amount of money he has," *Griffin v. Illinois, supra*, at 351 U. S. 19, and consequently that "[t]he imposition by the State of financial barriers restricting the availability of appellate review for indigent criminal defendants has no place in our heritage of Equal Justice Under Law.

Smith v. Bennett, 365 U.S. 708, 710-11 (1961)

No party should be denied relevant exculpatory evidence, and then denied appeal because they are poor. The United States Supreme Court should address this injustice and inequity.

CONCLUSION

Judicial integrity is vitally important at a divided time in our country with surveyed respect for the courts very low. The Catholic Church tried to hide their corruption for years, and it eventually became public and hurt them. The truth will come out. Bach asks the United States Supreme Court to take this case and clean the corruption now, before it gets worse.

As Justice Brandies put it,

Decency, security and liberty alike demand that government officials shall be subjected to the same rules of conduct that are commands to the citizen. In a government of laws, existence of the government will be imperiled if it fails to observe the law scrupulously. Our Government is the potent, the omnipresent teacher. For good or for ill, it teaches the whole people by its example. Crime is contagious. If the Government becomes a lawbreaker, it breeds contempt for law; it invites every man to become a law unto himself; it invites anarchy. To declare that in the administration of the criminal law the end justifies the means — to declare that the Government may commit crimes in order to secure the conviction of a private criminal — would bring terrible retribution. Against that pernicious doctrine this Court should resolutely set its face.

Olmstead v. United States, 277 U.S. 438, 485 (1928)

Everything described herein and in the record support the court violated the Eighth Amendment of the United States Constitution. Denying all contact between Bach her son is cruel and unusual punishment for having a brain tumor for AB, and advocating for her son for Bach. Federal law prohibits penalties that are grossly disproportionate to the offense, Weems v.

United States, 217 U. S. 349, 367, as well as those that transgress today's
"broad and idealistic concepts of dignity, civilized standards, humanity and
decency." Estelle v. Gamble, *supra*, at 102, quoting Jackson v. Bishop, 404
F.2d 571, 579 (CA8 1968). Everything detailed herein supports the courts
past deprivation of AB and Bach's right to see each other denies dignity,
civilized standards, humanity and decency.

Bach asks the United States Supreme Court to address this serious
threat to judicial integrity with her life and her son's at risk. This affects
millions of other disabled citizens and their families being abused.

Respectfully submitted,

Margaret Bach

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