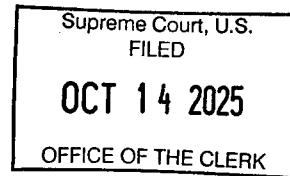


25-553

No. _____



IN THE
Supreme Court of the United States

SOSSAMMA GEORGE SEBASTIN,

Petitioner,

v.

SEBASTIN FRANCIS,

Respondent.

On Petition for a Writ of Certiorari
to the Supreme Court of Illinois

PETITION FOR A WRIT OF CERTIORARI

Sossamma George
Sebastin, *Pro Se*
13268 West Heiden Circle,
Lake Bluff, IL 60044
(347) 722 2820
sossammag@yahoo.com

QUESTIONS PRESENTED

1. Whether fundamental rights guaranteed by the Constitution are violated when a court denies a *pro se* litigant access to a custody evaluator's report that was used to effectively terminate parenting time, impose a protective order, and mandate psychological treatment, while also denying meaningful notice and opportunity to present rebuttal, exculpatory, inculpatory and impeachment evidence?
2. Whether fundamental rights guaranteed by the Constitution are violated when a court enforces a two-tiered system of justice by denying a *pro se* litigant the same procedural tools and rights it granted to opposing counsel for accessing evidence and presenting a case, thereby depriving the litigant of a protected liberty or property interest?
3. Whether the use of sealed custody evaluator's report (with alleged psychological diagnosis) to justify involuntary treatment, without granting access of that report to the diagnosed party, violates HIPAA and medical privacy laws, as well as procedural due process rights?
4. Whether a state court's repeated due process violations, specifically the denial of access to sealed custody records that were used to effectively terminate

parenting time, impose a protective order, and mandate psychological treatment, with the concurrent denial of meaningful notice, and opportunity to present rebuttal, exculpatory, inculpatory, and impeachment evidence, constitute a structural breakdown in judicial integrity?

5. Whether an appellate court's dismissal of a *pro se* parent's appeal on alleged technical grounds—without explaining the errors, without providing an opportunity to correct them, and with sanctions warnings for alleged notice of appeal defects—violates the First and Fourteenth Amendments' protections of access to courts and the right to petition by chilling good faith petitioning and precluding merits review of nonfrivolous constitutional claims?

PARTIES TO THE PROCEEDINGS

The sole petitioner for this writ is Sossamma George Sebastin. The respondent is Sebastin Francis.

RELATED CASES

- *In re Marriage of Sebastin Francis and Sossamma George Sebastin*, No. 131990 in Illinois Supreme Court: Petition for leave to appeal denied on July 24, 2025
- *In re Marriage of Francis, Sebastin and George Sossamma*, No. 2-25-0139 in IL 2nd Dist. Appellate Court: Case dismissed by Appellate

- *In re the Marriage of Sebastin Francis, Petitioner, v. Sossamma George Sebastin, Respondent*, No. 20 D 905, Circuit Court of Lake County, Illinois
- *Sebastin Francis (Petitioner) v. Sossamma George (Respondent)*, No. 23-OP-2596, Circuit Court of Lake County, Illinois
- In The Supreme Court of United States, S. G. S., Petitioner v. S. F., No. 24-1226
- *In re Marriage of S.F., Respondent, and S.G.S., Petitioner*, No. 131476 in IL Supreme Court: PLA denied on February 21, 2025
- *In re Marriage of S.F. and S.G.S., 2024 IL App (2d) 240440-U (consolidated Appeal of 2-24-0390 and 2-24-0440)* in IL 2nd Dist. Appellate Court: Opinion rendered on Dec 24, 2025

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PETITION FOR WRIT OF CERTIORARI

Petitioner, Sossamma George Sebastin, appearing *pro se*, seeks review of the judgment of the Illinois Appellate Court, Second District, entered on April 30, 2025, which dismissed Petitioner's appeal on case 20-D-905 from Lake County, IL. Appellate Court denied reconsidering on May 27, 2025. Illinois Supreme Court denied discretionary review on July 24, 2025, rendering trial court's rulings made by Judge Rhonda (Randie) Bruno final.

OPINIONS BELOW

- Denial of Petition for Leave to Appeal (PLA) by Illinois Supreme Court, 131990, July 24, 2025, Appendix A, 1a
- Denial of reconsideration 2-25-0139 by Illinois Appellate Court, Second District, May 27, 2025, Appendix B, 2a
- Dismissal of appeal 2-25-0139 by Illinois Appellate Court, Second District, April 30, 2025, Appendix C, 3a
- March 19 order, 20-D-905, Appendix D, 5a
- March 17 order, 20-D-905, Appendix E, 11a
- Temporary Order of Allocation of Parental Responsibilities, 20-D-905, November 17, 2023, Appendix F, 16a

JURISDICTION

The Illinois Supreme Court denied Petitioner's PLA on July 24, 2025. This Petition is timely filed within 90 days of that decision pursuant to 28 U.S.C. § 1257(a) and Supreme Court Rule 13. The Court has jurisdiction under 28 U.S.C. § 1257(a) to review final judgments of state courts that present substantial federal constitutional questions.

RELEVANT CONSTITUTIONAL AND STATUTORY PROVISIONS

- U.S. Const. amend. I
- U.S. Const. amend. V
- U.S. Const. amend. VI
- U.S. Const. amend. IX
- U.S. Const. amend. XIV
- Health Insurance Portability and Accountability Act (HIPAA) of 1996, 42 U.S.C. § 1320d et seq.
- 45 C.F.R. §§ 164.500–164.534
- 28 U.S.C. § 1257(a)

STATEMENT OF THE CASE

Petitioner is the biological mother of two minor children (R.S. now 16 years old and A.S. now 8 years old). Petitioner, Sossamma George, is the respondent in cases 20-D-905 and 23-OP-2596 initiated by Respondent of this writ, Sebastin Francis in Lake County, IL.

In 2020, Sebastin Francis in his petition for dissolution of marriage claimed both parties are fit and proper to share the allocation of parental responsibility and significant decision-making responsibility.¹

In Aug 2022, Respondent hired a new counsel. Soon after hiring his new counsel, Respondent began filing non-stop emergency motions, most of which sought to strip Petitioner of parenting and decision-making rights and to give Respondent exclusive access to the marital home.² These motions were filled with countless false allegations.

¹Paragraph No. 8 of the petition for dissolution of marriage filed by Sebastin Francis in July 2020.

²Court proceeding report of Dec 13, 2022 shows GAL, Caryn Barone being questioned by Petitioner's counsel:

Q And he has filed about three or four emergency motions over the past three months, four months, correct?

A I believe so. I'm trying to think –

Q And he has sought to supervise or suspend her parenting time in the most latest emergency motion; is that correct?"

A "The one from yesterday, correct.

Respondent filed motions even when Petitioner and minor children were grieving the loss of Petitioner's father and while R.S. was in critical condition.³

Respondent filed 16 emergency motions before the final ruling, two of which he withdrew, and all the rest were heard and granted by Court as emergencies. These motions were heard without adequate notice or time to respond. In contrast, Petitioner filed two emergency motions before the final ruling, one for moving out and another for in-camera interview with R.S. Court declined to treat the latter as an emergency.

As reflected in court records, GAL's initial proposal of joint custody took a dramatic shift after Respondent hired his new counsel in Aug 2022.

³Court proceeding report of Dec 14, 2022 shows GAL being questioned by Petitioner's counsel.

A I got information that flights were expensive. And then I got information that tickets had been booked.

Q And you got information that Sebastin literally e-mailed saying she can stay there and grieve, correct?

A Yes

Q Okay. And you know that while Sossamma was in India caring for her dying father, that Sebastin filed discovery requests and filed a motion against -- motions against her, correct?

A Yes

Respondent filed non-stop emergency motions heard immediately by Court as requested by Respondent.⁴

⁴Table shows Respondent's motions heard as emergencies

Filed	Respondent's Motion	Heard
08/31/22	Emergency Petition To Compel The Children To Attend School, For Restricted Decision-Making, Supervised Parenting Time, Etc.	9/2/23
09/13/22	Amended Emergency Petition To Compel The Children To Attend School, For Restricted Decision-Making, Supervised Parenting Time, Etc	9/15/23
10/05/22	Emergency Petition For Exclusive Possession Of The Martial Residence	10/6/23
12/13/22	Emergency Petition To Compel Residential Treatment, For Restricted Parenting Time With Both Children, And For Other Relief	12/13/22
11/17/23	Emergency Order Of Protection	11/17/23
11/17/23	Emergency Temp custody motion	11/17/23
05/12/23	Emergency Motion To Restrict Parental Responsibilities	17 & 19 May 23
09/11/23	Emergency Motion To Restrict Parental Responsibilities	9/13/23
09/19/23	Emergency Motion To Clarify September 13, 2023 Order	9/20/23
11/20/23	Emergency Motion To Clarify And Or Modify Nov Ember 17, 2023 Order	11/21/23
06/12/24	Emergency Motion To Release The Children's Passports	6/14/24
06/12/24	Emergency Motion To Remove Confidential Information From Google	6/14/24

Custody proceedings centered around R.S.'s mental health. R.S. began struggling with mental health issues in 2021, which intensified in 2022, resulting in multiple hospitalizations/residential treatments for suicide prevention, self-harm, and trauma recovery.⁵

Following R.S.'s suicide attempt, R.S.'s therapist raised concerns on GAL through written communication to Court. Soon, Court removed R.S.'s therapist from providing care to both children without evidentiary hearing.⁶ At that time, R.S. was critical.⁷ Court also granted Respondent's request to appoint Dr. David Finn as a custody evaluator.⁸

⁵Court proceeding report of May 15, 2024, show following interaction between Court and witness, Dr. Finn

Court: "And obviously Dr. Fleck in his or her report diagnosed her with a number things including PTSD, depression, and anxiety".

The Witness: "She clearly met the criteria".

⁶Paragraph 5 of Sep 15, 2022, order states "Neither minor child shall see Safia Khan, any further for any reason"

⁷Paragraph 6 of Sep 15, 2022, order states "The parties shall remove or lock up all corrosive agents, laundry products, cleaning products, sharp objects, knives, medications, and any other items that could be dangerous to one of the children."

⁸On Aug 31, 2022, Sebastin Francis, filed 'emergency petition to compel the children to attend school, for restricted decision-making, supervised parenting time, and for other relief. Paragraph #26 of that motion shows his request to appoint Dr. David Finn as the custody evaluator

Respondent sought to enroll R.S. in public school, opposing R.S.'s therapist's recommendation for private school, deemed necessary for R.S. to heal from trauma linked to prior experiences in public school.⁹ Respondent specifically attempted to return R.S. to go back to the same public school and excluded Petitioner from the admission process.¹⁰

⁹Court proceeding record of Dec 14, 2022, shows Petitioner's counsel questioning GAL

Q So the professional recommended the private school. And dad refused to pay, but mom stepped up to pay all of it; is that correct?

A Yeah.

Court proceeding report of Dec 14, 2022, shows Petitioner's counsel questioning GAL. Oak Grove is the public school.

Q Has Sebastin provided you with any alternatives besides her just going back to Oak Grove?

A Well, we have a court order that we're to go to Oak Grove.

Q I'm sorry. The question is, has Sebastin provided you with any alternatives besides her going to Oak Grove?

A No.

¹⁰Court proceeding report of Dec 14, 2022, shows Petitioner's counsel questioning GAL. Here Oak Grove is the public school.

Q Sure. So it said Dear Sossamma and Sebastin. But the two e-mails turned out to be both Sebastin's personal e-mails, and not my client's, correct?

A Correct.

Q Do you have any concern that the one e-mail that we've received on the Oak Grove School registration was sent to two personal e-mails to Sebastin, and my client was not included?

A Honestly, no.

In October 2022, Court granted Respondent's request and ordered Petitioner to move out of the marital home within the next 4 days while allocating that weekend as parenting time for Petitioner with A.S.¹¹ Court also ordered a 50/50 parenting time schedule for A.S. and deferred R.S.'s parenting schedule to discretion of her medical professionals and R.S. herself.¹² R.S. was in residential treatment at that time.¹³ Based on medical recommendations and R.S. herself, R.S. remained solely in Petitioner's care from Oct 2022.

¹¹Paragraph No. 5 of Oct 6, 2022, order, states "Mom shall move out on/before October 11,2022 by 6:00 p.m. and Dad shall have exclusive possession of the residence as of October 11, 2022 at 6:00 p.m. Mom shall not move out in front of A [REDACTED] unless the parties agree. If they do not agree, Dad shall take A [REDACTED] out of the home while Mom is moving out" Paragraph No. 6 of the same order reads "Mom is allowed to remove her personal property, including all of the furniture and items in her bedroom, and only other furniture and items agreed upon by the parties in writing. Mom can take 50% of the children's clothes and toys, and the bed she bought for A [REDACTED]. This division is not to happen in front of A [REDACTED]. If the parties cannot agree in writing, then the Court to decide on further division."

¹²Paragraph No. 4 of Oct 6, 2022, order states "For R [REDACTED], per prior orders, the parties will listen to professionals and R [REDACTED]. No set parenting schedule yet".

¹³Paragraph No. 8 of Oct 6, 2022, order states that R.S was in TK (Timberline Knolls Residential)

On December 14, 2022, Court removed Petitioner's medical decision-making rights for R.S. in violation of due process as Respondent's motion was filed an hour before court session.¹⁴ Trial court made this ruling on hearsay, inadmissible evidence from GAL and without adequate time to respond to motion.¹⁵

Soon, Petitioner filed a motion to reconsider and re-instate Petitioner's decision-making rights based on truth and evidence. However, Court indefinitely postponed the hearing of Petitioner's motion, stating it would take no action until Dr. Finn submitted his custody evaluation report.¹⁶

¹⁴Court proceeding report of Dec 13, 2022, transcript shows the following statement from Mr.

Alvarado, Petitioner's counsel:

"MR. ALVARADO: "Absolute. We are objecting to this hearing. The emergency motion was sent one hour before Court this morning which is improper notice. The emergency motion did not include a request for changing or taking away decision-making at all. We are being forced to a hearing on decision-making which you know we believe takes away my client's due process rights to prepare, organize, bring witnesses, et cetera, and we were not able to do that for today. So that's the objection."

¹⁵Petitioner's Motion In Limine, May 15, 2023, states how court ruled on inadmissible speculation and hearsay while allowing leading questions during Dec 13 and Dec 14, 2022 hearing.

¹⁶Paragraph No. 6 of the order filed on Jun 9, 2023, states "Sossamma's petition to modify order re: medical decision making is entered and continued for hearing after Dr. Finn's report is available"

November 17, 2023 -traumatic shift in the case

Nov 17, 2023, was originally designated as a pretrial session.¹⁷ Petitioner had no prior notice that Dr. Finn's report was ready, or it would be revealed by the Court, or there would be a hearing on Nov 17.

On November 17, 2023, Court privately released Dr. Finn's report only to the attorneys and, within minutes, converted the pretrial into a full-day emergency hearing.¹⁸ On this day, Court completely removed both then 15-year-old R.S. and 6-year-old A.S. from Petitioner's care (while children were in school), imposed a temporary order of protection, and ordered that Petitioner could have no contact with minor children or their medical professionals or school professionals or child welfare services.¹⁹

¹⁷Paragraph No. 2 of Nov 9, 2023, order states "This matter is set for further pretrial on November 17, 2023 from 9 am to 5 pm. All parties, the GAL and Counsel shall plan to be in court and in person all day in C-105"

¹⁸Court proceeding report of Nov 17, 2023, shows the following:

THE COURT: The record should also reflect that Caryn Barone was present. She's gone outside to call Doctor Finn. So pursuant to Doctor Finn's recommendations and the conversation that I had with the attorneys last week, the evaluation was not tendered to anyone but myself and Miss Barone until this morning in Court. Mr. Douglas, have you had an opportunity to read it?

¹⁹Appendix F shows temporary order from Nov 17, 2023.

These drastic measures were based exclusively on Dr. Finn's report and on Respondent's emergency motions for temporary custody and a protective order, which were filed immediately after the court revealed Dr. Finn's report to the attorneys.²⁰

Court also imposed a treatment mandate on Petitioner, ordering her to see Dr. Chinni Chilamkurti, a medical professional hand-picked by Dr. Finn.²¹ Court also ruled that Dr. Finn will determine whether any parenting time can be given to Petitioner after Petitioner completes 26 treatment sessions with Dr. Chinni. Court also ordered that parties cannot have a copy of Dr. Finn's report.²¹

²⁰Court proceeding reports of Nov 17, 2023 show that Dr. Finn's report was revealed in that court session and that Respondent filed emergency motions immediately, which were heard instantly by the Court. Nov 17, 2023 was previously set to be pretrial day as seen in footnote 17

²¹Appendix F shows Nov 17, 2023, order where Paragraph I states:
"Respondent shall enroll in therapy with Dr. Chinni Chilamkurti (84 7-7 44- 8064). After a minimum of 26 sessions with Dr. Chinni, Respondent should submit to a limited scope update of Dr. Finn's evaluation to determine if any type of parenting time, beginning with therapeutic reunification, is recommended as being in the best interest of the children."

However, the order did not specify any formal diagnosis, the type or purpose of the treatment, or the medical basis for referring Petitioner to Dr. Chinni. The treatment requirement was imposed solely based on a sealed report from custody evaluator, Dr. Finn, who is not an expert of the alleged diagnosis and did not present any medical evidence for his allegation. Dr. Finn's report was not only not corroborated by the facts but also contradictory to R.S.'s medical records that linked Respondent, Sebastin Francis, to R.S.'s trauma and identified Petitioner, Sossamma George, as R.S.'s primary support system.

Court further ordered that Petitioner and her counsel(s) shall not have any communication with any treatment provider or school official through any communication method.²² Court ordered that attorney for neither party may communicate with any treatment provider, but instead shall raise any issues, questions or concerns with GAL, who may then, at her discretion, contact said provider.²³

²²Paragraph J of Nov 17, 2023, order in Appendix F

²³Paragraph M Nov 17, 2023, order in Appendix F

Court further imposed extraordinary restrictions on Petitioner's ability to communicate with her children. It appointed an additional(messaging) therapist, selected by Dr. Finn, to act as a gatekeeper, reviewing messages and forwarding only those deemed appropriate. Court ordered that all messages must be brief and could not contain statements such as "I miss you."²⁴ Shortly thereafter, court granted Respondent's emergency motion, restricting Petitioner to sending no more than one message per week per child. This restriction was imposed without due process and without any articulated basis for this restriction.²⁵

²⁴Paragraph I to L of Nov 17, 2023 order in Appendix F

²⁵Paragraph # 8 of Feb 16, 2024, order states:

"Petitioner's Motion to Clarify and/or Modify November 17, 2023 Order is granted. The parties shall comply with the November 17, 2023 Order with the understanding that Sossamma may write one card or letter per week for each child. They and do not get routed through the GAL, but the letters are sent directly to the therapist. If the therapists deem the letters inappropriate to give to the children, then they shall send the communication to Pamela Rak. The parties shall continue to follow Paragraphs J, K and L. Sossomma shall not include any communication to the therapists other than the letter."

On Mar 19, 2024, Court made edits to Feb 16th order without a motion from Respondent. A snippet from March order: "If appropriate, Pamela shall forward the letters to the children's therapists who shall deliver the letters to the children.....nor shall SOSSAMMA have any contact with the therapists."

On November 17, 2023, Court not only violated fundamental constitutional rights and Illinois law but also contradicted the truth about children and Petitioner's fitness as a parent.²⁶ Court also advised Respondent on the proper motions to file to seek removal of children from Petitioner's custody.²⁷

²⁶Court report proceeding of Nov 17, 2023, show following from Mr. Douglas, Petitioner's counsel:

MR. DOUGLAS: "Correct. The report speaks for itself. Large swaths of what was just referenced do not find support in Dr. Finn's report. He did articulate what he thought should happen. I know to the extent that you're going to enter orders that amount to an allocation of parental responsibilities, that Section 604-10 (B) provides regarding reports such as this under Subsection D, the Court may seek the advice of any professional. The advice to the court shall be in writing and sent by the professional to counsel for the parties and to the Court in 60 days before the date on which the trial Court reasonably anticipates a hearing on the allocation of parental responsibilities will commence. I do not see in the statutes any other exception for an immediate hearing. Further, the statute, that Subsection B does provide the writing maybe admitted into evidence without testimony from it's author unless a party objects. I object."

²⁷Court proceeding report from Nov 17, 2023, shows following statement from Judge Randie Bruno:

THE COURT: It's my understanding pursuant to 604-10 (D) and (B) that certainly a party can object, but obviously a Court always has the authority to overrule the objection. The Court could also suggest to Ms. Riewer and Ms. Wu that perhaps simultaneously in addition to filing the petition for emergency O.P. they also file an emergency motion to modify parenting time.

During his testimony, Dr. Finn claimed that Petitioner has Munchausen Syndrome by Proxy while providing no supporting medical evidence for the alleged diagnosis or his expertise to make such a diagnosis. During the May 2024 final trial, Dr. Finn testified that R.S. has no falsified symptoms, which renders his alleged diagnosis both logically and medically implausible.²⁸

As seen through the court proceeding reports, he also clearly chose to believe statements that R.S. allegedly shared only with him (and not with any medical professional), while choosing to disbelieve her statements about Respondent that have been documented across numerous medical records.

²⁸Court proceeding report of May 15, 2024 shows the following where Petitioner's counsel is questioning Dr. Finn

Q. "And do you believe that R█████ is falsifying or faking her symptoms at this point as she goes through this?

A. "I don't think R█████ is falsifying anything. I think the reference -- the distress that she's having with the separation between her parents though is significant."

On Nov 17, 2023, Dr. Finn claimed that a video from Respondent was incriminating Petitioner.²⁹ However, May 2024 trial revealed that Dr. Finn was wrong, and that it was Respondent's sister and not Petitioner in that video.³⁰ It was also revealed that the video was evidence of Respondent coaching A.S., which Dr. Finn refused to accept.

²⁹Court proceeding report of Nov 17, 2023, shows following interaction between Dr. Finn and Court

THE COURT: What is the basis of your recommendation regarding A [REDACTED] and the serious endangerment?

A Okay. The basis of that recommendation, Judge, is the symptoms that are being reported that at least Sossamma is reporting that A [REDACTED] is experiencing symptoms that are consistent or at least part of the basis of post traumatic stress disorder; that he's having these nightmares. I viewed a video of A [REDACTED] and Sebastin in which they were actually doing Facetime with Sossamma where A [REDACTED] was saying that if he's not with family he's going to go to hell or something like that.

³⁰Court proceeding report of May 15, 2024 shows following interaction between Ms. Riewer (Respondent's counsel) and Mr. Farooqi (Petitioner's counsel)

MS. RIEWER: That is not a call to Sossamma. That is a call with Sebastin Francis's sister, and so I understand what they're trying to do but that's not Sossamma.

MR. FAROOQI: And I agree with that, your Honor, that's part of the problem because this is something that Dr. Finn testified to on November 17th in discussing why Sossamma is an endangerment to A [REDACTED] is he identified this video call between Sossamma and A [REDACTED] with Sebastin being present and the video itself is problematic so -- which is why I want to ask Dr. Finn about the video itself."

Dr. Finn and Court knew that R.S. was at high risk of mental health deterioration with custody shift to Respondent.³¹ Yet, they knowingly allowed R.S. to escalate to suicide risk and hence R.S. was in hospital and residential treatment for over two months and eventually on higher medicines as seen in the final judgement. It should be noted that Dr. Finn reviewed most of R.S.' medical reports including the one that listed Respondent as a trigger for R.S.

³¹Court proceeding report of Nov 17, 2023 shows Dr. Finn being questioned by Petitioner's counsel, Mr. Douglas

Q You're aware, R. [REDACTED], you mentioned that she has suicidal issues, suicide risk, correct?

A Yes.

Q You're aware that R. [REDACTED] will react highly negatively to being placed in her father's care, correct?

A I don't know how R. [REDACTED] will react. I have concerns which is why I recommended some safety precautions.

Q How far does this need to be taken for R. [REDACTED]'s conduct -- are you testifying at all cost the child will be placed with father no matter how she reacts?

A If she can't be in her father's care then if she becomes suicidal she should be in the hospital where she --

Q You froze again. I could not hear your answer.

COURT: If she can't be with her father, then in the hospital

MR. DOUGLAS: He froze.

THE COURT: I did not hear anything else.

MR. DOUGLAS: Because he froze.

A Yes. Can you hear me?

Q Now, I can.

A If she cannot be in her father's care she should be in a hospital where she could be safely monitored and treated.

Before final trial:

On January 8, 2024, Court ordered Dr. Finn to produce relevant documents to Petitioner's rebuttal expert.³² Dr. Finn did not comply with the subpoena for several months. Court allowed him to delay compliance unconditionally and allowed him to even produce documents during his final testimony in the final trial on May 15, 2024.³³

Court denied Petitioner's requests to extend the final trial date and refused to allow adequate time for subpoenas, discovery, depositions, or preparation of rebuttal expert testimony.³⁴ Court also denied Petitioner's request to allow testimony from her rebuttal expert and her treating psychologist.³⁵ In Feb 2024, Petitioner's psychologist submitted a written statement to the court confirming that Petitioner does not have the diagnosis alleged by Dr. Finn and that court ordered treatment would harm Petitioner. Petitioner's psychologist also revealed that Dr. Finn never spoke with her despite her attempts to connect with him.³⁶

³²Paragraph 4 of Jan 8, 2024 order

³³Paragraph 1 of May 14, 2024, order states "That Dr. Finn shall produce the comparative results of the Respondent's MMPI results, specifically the section titled comparison Group Bata: Forensic, Child Custody Litigant. Said Results shall be produced to all counsel by 9:00 a.m. on May 15, 2024"

³⁴As seen in Apr 24, 2024 order

³⁵As seen in May 2, 2024 order

³⁶Appendix H - Petitioner's psychologist's letter from Feb 2024

On May 10, 2024, Petitioner requested to bar Dr. Finn as he altered Petitioner's MMPI results, removing favorable findings for Petitioner.³⁷

³⁷ In Petitioner's 'Motion in limine, to compel production and other relief' filed on May 10, 2024, paragraphs 15 to 24 state:

15. The MMPI results will also generate a section entitled Comparison Group Data: Forensic, Child Custody Litigant (Men), N=243. This section is designed to compare the T-Scores on validity to individuals in similar circumstances as to determine the truthfulness of the individual relative to others in the same situation. Since it is not uncommon for individuals going through a custody litigation to dishonest in the manner in which they attempt to present themselves, the comparative results are an important lens by which to interpret the T-Scores. On Sebastian's report, he scored in the 98th percentile, which means that 98% of similar litigants had a lower T-Score and were more truthful than Sebastian.

16. Given Sebastian's inflate T-Scores, indicating significant deception on his part during the testing and evaluation process, it is important to have Sossamma's same comparative data to determine if her responses were significantly more honest. However, on her MMPI results, the comparative data has been omitted. As the comparative data is typically standard on MMPI results, their omission is suspect and makes it more difficult to present evidence that Sossamma's answers during the evaluations were more truthful. According to Dr. Jospeh, these comparative results are automatically generated for each participant, and thus a corresponding section should exist for Sossamma. True and accurate copies of the score reports are incorporated herein by reference and can be made available to the Court at hearing.

17. Upon information and belief, Sossamma's score report was most likely altered, and removed from her score report."

Despite this credible challenge to Dr. Finn's integrity and to evidence's authenticity, Court did not bar Dr. Finn as a witness and allowed him to submit the authentic MMPI results during his testimony in final trial.

In Apr 2024, R.S., who was 15 years old at that time, sent out a disturbing note after six months of no direct contact with Petitioner.³⁸ In her note, she described her little brother's and her suffering following the separation from Petitioner. She mentioned that both GAL and Respondent had threatened her that Petitioner would go to jail if R.S. wrote to Petitioner. R.S. also noted that Respondent and GAL badmouthed Petitioner and negatively influenced her good memories with Petitioner.

Despite the seriousness of these claims and having a copy of R.S.'s note, the court denied Petitioner's request for an in-camera interview with R.S.³⁹ Instead, the Court ordered GAL to meet with R.S.

³⁸Appendix G - R.S.'s note which was admitted as final trial evidence and is also an exhibit in other motions filed by Petitioner

³⁹Paragraph 1 of May 2, 2024, order

Pursuant to a court order dated April 10, 2024, Petitioner's former attorney, Dwayne Douglas, was compelled to produce to opposing counsel his email correspondence with substantive attachments sent to GAL, Caryn Barone, and Dr. Finn.⁴⁰

After Nov 17, 2023, Respondent unilaterally selected all children's medical professionals (including new therapists), without any consultation with Petitioner.

⁴⁰Paragraph 2 of April 10, 2024, order states:

"In answer to the subpoena served. Dwayne Douglas shall tender to Strategic Divorce, within three (3) days, any email correspondences which have attachments from Dwayne Douglas to Dr. Finn, and any email correspondences which have substantive attachments from Dwayne Douglas to the GAL, Caryn Barone, and production of the emails with the attachments noted above shall constitute complete compliance."

Final Trial - May/June 2024:

On the first day of the final trial, the court immediately granted a motion that Respondent filed the same morning leading to exclusion of 18 children's medical professionals, children's medical records, and R.S. herself.⁴¹ This ruling came even though Petitioner had properly disclosed these witnesses six months before the final trial as per the court guidelines. The excluded professionals were directly involved in the children's care. The court's exclusion of this evidence eviscerated Petitioner's defense, barring the most crucial testimony and documentation needed to establish the truth.

Dr. Finn presented a psychological diagnosis that lacked foundation, omitted exculpatory and inculpatory evidence, and was contradicted by Petitioner's treating psychologist and the children's medical providers. The trial court allowed his testimony to go unrebutted by denying Petitioner the ability to present her rebuttal expert, present the children's treating professionals and medical records, present her own psychologist and present R.S.⁴²

⁴¹As seen in May 13, 2024, order

⁴²Paragraph 2 of May 2, 2024, order

Dr. Finn's claims were medically implausible as he testified that R.S. has no falsified symptoms as seen in footnote 28. He testified that two treating medical professionals of R.S. reported that they had a lot of conflict with GAL even though he declined to share more details.⁴³ He also testified that these professionals did not share any concern about Petitioner coaching R.S. or influencing R.S.'s allegations on Respondent.⁴⁴

⁴³Court proceeding report of May 15, 2024, shows Dr. Finn being questioned by Petitioner's counsel

Q. If you go to the ninth bullet point you wrote they coordinated with GAL a lot of conflict with her. Can you please tell the Court what you mean by that?

A. Yeah. I don't -- I just don't recall what that means.

⁴⁴Court proceeding report of May 15, 2024, shows Dr. Finn being questioned by Petitioner's counsel

Q. Was there any part of this conversation where Toni Boos or Kim Hadlich reflected that mom was either coaching the child or influencing the child's allegations against dad? a concern about mom coaching.

A. No. There was no part where they referenced a concern about mom coaching.

Q. This is a true and accurate copy of notes you have from this?

A. It appears to be.

GAL presented countless inaccuracies regarding R.S.'s medical information and the rebuttal required medical professionals and medical records, which were barred by the Court.

One of R.S.'s therapists was allowed to testify, but only to confirm what she had communicated to the GAL, and she was not permitted to testify anything more. This testimony proved that GAL had falsely accused Petitioner under oath.⁴⁵ It was also proven that GAL falsely accused Petitioner in other matters as well. Under oath, GAL accused Petitioner of canceling R.S.'s medical appointment when evidence revealed that it was Respondent who canceled it.

⁴⁵Court proceeding report of May 21, 2024 shows Petitioner's counsel questioning Safia, R.S.'s therapist. Here, Ms. Barone is the GAL.

Q. The next line says, Safia states that she had talked to Samma on multiple occasions, that R [REDACTED] needs to come home and address these issues.

A I did not say that.

Q. With respect to that statement, did you ever contact Sossamma during the time that she was India and advise her that she needs to return back to the United States?

A. No, I did not.

Q. The next line says, Safia is afraid that R [REDACTED] will have a psychotic break while in India and not be able to get appropriate care. Is that something that you conveyed to Ms. Barone?

A. No, I did not.

Respondent was proven to be lying multiple times under oath as stated in the judgement for dissolution of marriage.⁴⁶

Respondent had also repeatedly falsely accused Petitioner of violating the order of protection. In February 2024, Respondent filed two separate petitions: one seeking to seal the case and another alleging that the Petitioner is in violation of the order of protection. Both petitions were premised on unsubstantiated claims and were ultimately withdrawn by Respondent without explanation.⁴⁷

⁴⁶Paragraph 21 of final judgement (July 16, 2024) states following:

“GAL Barone did testify that a number of pleadings had facts wrong about Sossamma such as the claim that Sossamma told Libertyville High School about R.S. 's diagnosis of PTSD-she did not, as it came from medical records, and this was confirmed by the school. Sebastian also claimed in pleadings that Sossamma had cancelled an appointment at Compass in August of 2022 when in fact emails were introduced that showed it was, he who cancelled the appointment. Sebastian also stated in a pleading he did not have conversations with therapist Safia Khan while R.S. was in India which was also false.”

⁴⁷Paragraph 3 of Mar 19, 2024, order states:

“SEBASTIN's Emergency Motion to Seal File and Emergency Motion to Restrict Parental Responsibilities are withdrawn without prejudice.”

Immediately after a temporary order of protection was issued in Nov 2023, Petitioner had filed a motion to dismiss, which showed that the order was a violation of IL domestic act of violence as there was no abuse and Respondent's petition itself was deficient.⁴⁸ This dismissal motion was never heard by Court until final trial in May 2024.

The final child custody ruling mirrored Nov 17, 2023, child custody ruling and a plenary order of protection was issued. Orders contain a multitude of adverse findings and statements against Petitioner without any corroborating evidence. It was based on unrebutted opinions and testimonies proven to be not credible while excluding every source of rebuttal, exculpatory, inculpatory and impeaching evidence.

⁴⁸Paragraph 3 & 15 of Petitioner's Motion To Dismiss states:

"3. To the extent that one can follow what is being alleged, it appears that the Petition makes two principal claims: 1) the content of the report of Dr. David Finn supports the issuance of an Order of Protection, and 2) that Sossamma's actions are not in the child's best interests, citing actions such as "brainwashing," creating "a false narrative," lying, manipulation, "attempts to alienate," creating a "false narrative," etc. *See, Exhibit A.*

15. A Petition for Order of Protection, if deficient, is subject to dismissal per section 2-615 of the Code of Civil Procedure as "[a]ny proceeding to obtain, modify, reopen or appeal an order of protection, whether commenced alone or in conjunction with a civil or criminal proceeding, shall be governed by the rules of civil procedure of this State." 750 ILCS 60/205(a) (West 2023)."

In final judgement, Court awarded retroactive temporary child support to Respondent even though Court had denied temporary child support to Petitioner. Court further ordered Petitioner to pay Respondent's attorney fees amounting to \$59,000. The Court's financial rulings were marred by factual inaccuracies and internal inconsistencies, including a failure to accurately assess Petitioner's indebtedness.

Moreover, Petitioner was denied sufficient time for discovery, impairing her ability to effectively challenge Respondent's financial representations.

July 2024:

Petitioner began proceeding as a self-represented litigant in July 2024 due to financial distress. Petitioner, proceeding *pro se*, filed a motion for access to Dr. Finn's report and related subpoenaed materials.

March 17, 2025:

Even though appeal concluded in December 2024, the hearing of Petitioner's motion for access to Dr. Finn's report and other material was delayed at the Court's

discretion until March 17, 2025. In contrast, Respondent's motion filed significantly after Petitioner's motion, was heard in January 2025. During January 10, 2025, hearing, Petitioner raised this discrepancy as a concern, noting a pattern in the case where motions for access to critical evidence were previously heard in a timely manner.⁴⁹

On March 17, 2025, the court imposed *sua sponte* pre-filing restrictions, requiring prior leave to file any motion. In doing so, it improperly conflated enforcement actions (petitions for rule to show cause) with standard procedural motions, refusing to acknowledge the material distinction. See paragraph #1 of Appendix D.

Court declined to hold Respondent in contempt for documented violations of a court order, refusing to impose a purge condition or other sanctions. The court merely admonished Respondent to comply in the future, reasoning that a past violation could not be purged. See paragraphs #3 and #5 of Appendix D.

⁴⁹Court proceeding report of Jan 10, 2025, shows following statement from Petitioner

MS. GEORGE: Your Honor, I have a quick question. I am not sure why the Dr. Finn's thing needs to be postponed. I have technically seen those motions be heard immediately. I just need the same documents that Ms. Riewer is holding onto. At the moment as a pro se I am totally at a disadvantage. I have

been a pro se for several months. She has all the advantage over me. She has all the documents and I don't have what she has. I am not sure what the delay is

Despite evidence that Respondent failed to inform Petitioner of out-of-state travel with the children, the court ruled the original judgment's notice requirement applied only to vacations and not to all travel. The court then modified the judgment, ordering that any future overnight out-of-state travel requires advance notice. See paragraphs #6 and #7 of Appendix D.

Original order required Respondent to initiate payment arrangements for a specified debt within two weeks. The March 19, 2025, order states that the original judgment contains no deadline for payment and did not hold Respondent in contempt of court order even though no payment arrangements were made by the Respondent. See paragraph #8 of Appendix D. July 16, 2024 order says "*Sebastian shall contact the IRS and applicable credit card companies within two weeks of the entry of this order to make arrangements to pay his stated share of the debt.*"

March 19, 2025, order also contains clerical inaccuracies by listing previously adjudicated Petitioner's motions in both the docket of matters presented that day and the schedule for future hearings, despite these matters having been resolved in prior proceedings.

On March 17, 2025, the court denied Petitioner access to Dr. Finn's report and subpoenaed materials as seen in Appendix E. In the hearing, Petitioner objected

when opposing counsel made factually inaccurate statements. Petitioner noted that the statements lacked foundation and were unsupported by evidence. Court overruled the objection, stating it was not an evidentiary hearing. Court did not require opposing counsel to correct or show evidence of the claims, nor clarify that unsupported assertions would not be treated as fact.⁵⁰ In addition, the judge posed a leading question to Respondent's counsel "*Are you not objecting to her getting a copy of the... report?*"⁵¹

⁵⁰Court proceeding report of March 17, 2025 shows following interaction between Petitioner and Judge Bruno

THE COURT: I'm sorry, you object to what ma'am?

MS. GEORGE: Her argument needs foundation. She needs to show the evidence of what she

THE COURT: No, ma'am

MS. GEORGE: is claiming.

THE COURT: it doesn't. It's an argument. That is incorrect. If we were having an evidentiary hearing, Ms. George, then, yes, but we are not having an evidentiary hearing. We are having arguments. And just like you made arguments, she is entitled to make arguments as well. So objection overruled.

⁵¹Court proceeding report of March 17, 2025 states:

THE COURT: So, Ms. Riewer, let me understand correctly. Are you not objecting to her getting a copy of the motion -- or the order of the report?

MS. RIEWER: I didn't say that. I am saying that in the event that your Honor decides to disclose that report.

When Court introduced new legal grounds, Petitioner objected that these arguments were not raised by Respondent, Court overruled the objection and denied Petitioner an opportunity to respond.⁵²

⁵²Court proceeding report of March 17, 2025 shows:

COURT: We're not. I'm going to mute you if you don't stop. We're not doing this today. I asked you if you had a question. You did not have a question. You just wanted to give further argument, which I am not going to permit today. So I'm going to ask you one more time, and then we're going to move on. Not a further argument, not a further that I am wrong and you are right, I understand that. Do you have a question about what my ruling is, not that you agree or otherwise, a question?

MS.GEORGE: So I have a question from the process standpoint. I made arguments, she presented her arguments, I replied to them. And the court brought in a lot more new aspects

COURT: The court didn't bring in anything new, Ms. George

MS. GEORGE: Well, we didn't --

COURT: that is inaccurate.

MS. GEORGE: -- we both -- so, well, in my mind you did because those were not argued by Ms. Riewer. There was a lot of additional arguments or observations or however the right -- whatever the right words are. And I have responses to those. In this situation when the court --

COURT: Ms. George, we're not doing this. We're not. You're not responding again. No, we are not doing this, ma'am. So I don't want to keep muting you, but I will if you don't follow the court's direction. So please unmute yourself. Please unmute yourself.

MS. GEORGE: Your Honor, it is a violation of my civil right when you mute me in the middle --

COURT: No, ma'am --

MS. GEORGE: of my --

COURT: it is not

Appeal – April to June 2025:

On April 30, 2025, Appellate Court dismissed Petitioner's appeal related to the denial of access to Dr. Finn's report and other issues stemming from March 17, 2025, hearings. Appellate cited lack of jurisdiction without offering any explanation for that conclusion and without giving an opportunity to correct errors. Appellate inaccurately stated that three prior appeals were dismissed at least in part for lack of jurisdiction. Appellate also included an unsolicited admonition warning Petitioner that future appeals may be barred or sanctioned, despite no finding of frivolous conduct or abuse.

Petitioner filed a motion to reconsider the Appellate Court's April 30, 2025, dismissal. Petitioner also emphasized that the March 2025 trial court rulings, including the denial of access to Dr. Finn's report, raised new issues never previously reviewed. Petitioner's motion explained that the Appellate court's conclusion on prior appeals dismissals as lack of jurisdiction was incorrect especially when those cases included ones where Appellant had no money to pay for preparation of record on appeal. Petitioner also clearly pointed out how Respondent had provided false information to Appellate court. Appellate Court denied reconsideration without any explanation for its decision.

After Petitioner filed a writ of certiorari to the U.S. Supreme Court in May 2025 (Case # 24-1226) for matters from previous orders, Respondent moved Appellate Court to sanction her. In response, Petitioner filed a cross-motion to sanction Respondent since Respondent's motion was based on false accusations and inflammatory and unhinged rhetoric intended to paint her in a negative light. Petitioner also challenged the legal basis of Respondent's request for sanctions as Respondent clearly requested sanctions on Petitioner for filing a writ of certiorari with U.S. Supreme Court. Appellate denied both Petitioner and Respondent's requests for sanctions.

The Respondent's motion for sanctions constitutes a transparent effort to silence the Petitioner and punish her for seeking redress for violations of constitutional rights for minor children and her.

REASONS FOR GRANTING THE WRIT

This Court has long held that *pro se* pleadings must be liberally construed and not dismissed for technical deficiencies that do not prejudice substantial rights. *Haines v. Kerner*, 404 U.S. 519 (1972). Petitioner respectfully requests this Court to interpret this petition through that lens—as a good-faith effort by a layperson to raise urgent constitutional violations affecting the fundamental rights of parents, children and *pro se* litigants across the United States.

I. Denial of Access to the Custody Evaluator's Report and Reliance on Sealed Evidence Violates Constitutional Rights And Protections

Petitioner was denied access to Dr. Finn's report as a *pro se* on March 17, 2025. Previously, Petitioner was denied this report as a represented party.

Trial court used Dr. Finn's sealed report to remove Petitioner's children completely from her care, impose an order of protection, remove all parenting time, remove her access to medical and educational records/professionals of children and mandate psychological treatment on her. Before the introduction of this report, Petitioner had 50% custody for younger child, A.S. and 100% parenting time with older child, R.S., based on the recommendation of R.S.' medical professionals. Court barred every opportunity to rebut the claims by barring Petitioner's psychologist, rebuttal expert, R.S., children's medical professionals, children's medical records and any

witness who could speak for children's mental health. Additionally, it allowed perjury from GAL and Respondent and altered records from Dr. Finn to go without consequence.

Using a secret report to sever the parent-child relationship and mandate psychological treatment is a textbook violation of the Fourteenth Amendment.

Under *Mathews v. Eldridge* 424 U.S. 319, the fundamental right to family integrity and bodily liberty is of the highest order. *Troxel v. Granville* 530 U.S. 57.

Parents cannot be deprived of fundamental rights based on secret evidence they cannot confront. This violates core due process principles established in *Mathews v. Eldridge*, 424 U.S. 319 (1976) and *Santosky v. Kramer*, 455 U.S. 745 (1982)

During March 17, 2025, proceeding, court advanced its own legal theories for denying access to the report - theories not raised by Respondent, while simultaneously overruling Petitioner's objections. The Court committed a compound error by: (1) relying on the opposing party's unrebutted factual assertions, and (2) introducing its own arguments *sua sponte* without affording the *pro se* a meaningful opportunity to be heard. See *United States v. Sineneng-Smith*, 140 S. Ct. 1575 (2020) where it states, "In both civil and criminal cases, we rely on the parties to frame the issues for decision and assign to courts the role of neutral arbiter of matters the parties present." *Chambers v. Miss.*, 410 U.S. 284 says "Few rights are more fundamental than that of an accused to present witnesses in his own defense. *Hickman v. Taylor*, 329 U.S. 495 says "Mutual knowledge of all the relevant facts gathered by both parties is essential to proper litigation."

Besides other inconsistencies, an important inconsistency in the order denying Dr. Finn's report is it's claim that Dr. Finn's report was disseminated to the attorneys as per IL statute. IL statutes demand that the report be distributed to attorneys/parties at least 60 days prior. This court gave the report to Petitioner's attorney on the day it separated minor children from Petitioner (Nov 17, 2023) while simultaneously denying access to Petitioner.

Constitution demands rigorous procedural safeguards because the fundamental parent-child relationship is at stake.

II. Selective and Asymmetric Procedures Against A Pro Se Litigant Denied Due Process and Equal Treatment

A. Denying a Pro Se Litigant Access to Evidence While Granting It to Opposing Counsel Violates Due Process, Equal Protection and Right to confront evidence

While the Respondent's counsel and GAL were granted full access to the sealed custody evaluation report by Dr. Finn, the *pro se* Petitioner was denied access to the very evidence used to restrict her parental rights and mandate psychological treatment. In Nov 2023, Court granted Respondent's request to permit GAL to disseminate the sealed report to children's therapists (unilaterally appointed by Respondent), Pamela Rak, Dr. Chinni etc. even though the report was unrebutted, unverified, and lacked corroboration from treating medical professionals.

This created a two-tiered system of justice: one for Respondent and another for Petitioner, who was left unable to see, challenge, or rebut the foundation of the court's orders. Such a denial of access to core evidence violates the Due Process Clause as seen in *Greene v. McElroy*, 360 U.S. 474, 496 (1959)

B. Sua Sponte Filing Restrictions Unconstitutionally Chill A Pro Se Litigant's Right to Petition the Courts

The court-imposed filing restrictions as seen in Appendix D states that parties should file a motion to leave to file and appear in court to seek permission to file. These restrictions, entered *sua sponte*, have an especially severe impact on Petitioner, who has no access to her children, children's providers, children's records, or reliable information about them, and who is still waiting for a remedy to the constitutional violations against her and her children. Respondent currently has complete control over the children, medical and school professionals, and children's records. He has withheld children's information from Petitioner. As seen previously, Respondent's MMPI results revealed deceptive tendencies—findings that Dr. Finn effectively obscured by instead placing a false diagnosis on Petitioner.

Such a restriction has little to no impact on Respondent, but it severely impairs Petitioner's ability to file motions, seek a remedy, and present her case while keeping her job. It further cripples her ability to exercise her constitutional rights to her children, to due process, and to justice. This chilling of the right to petition the government, guaranteed by the First and Fourteenth Amendments, is especially

acute when applied to a *pro se* litigant operating under severe informational and financial disadvantages.

C. Selectively Enforcing Court Orders Against A Pro Se Litigant While Excusing a Represented Party Violates Equal Protection Clause

A stark contrast in judicial treatment reveals a pattern of discriminatory enforcement. The court previously threatened the *pro se* Petitioner with incarceration for alleged violation of child support order even before holding a hearing. Petitioner was ultimately found not in contempt.

Conversely, when presented with clear evidence of the Respondent's contempt, the court refused to hold him accountable. The court declined to make explicit findings of violation. This lenient treatment of the represented party, contrasted with the punitive and preemptive threats against the *pro se* litigant, demonstrates a violation of the fundamental principle that litigants are entitled to equal treatment under the law. This pattern raises a serious question of whether the state court administered justice in an even-handed manner, as required by the Fourteenth Amendment.

Pro se status should not become grounds for judicial obstruction. See *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996)

III. Court-Ordered Treatment Based on a Sealed Report Conflicts With Health-Information Privacy and Due Process Protections

Trial court not only imposed an order of protection and eliminated all parenting time based on a sealed report but also cut off Petitioner's access to her children's medical records/professionals and educational records/professionals. Court then mandated her to undergo psychological treatment stated in the same sealed report. Such a mandate nullifies core protections of both the Health Insurance Portability and Accountability Act (HIPAA) and the Due Process Clause.

The HIPAA Privacy Rule guarantees individuals the right to inspect their own health information (45 C.F.R. § 164.524). That right is meaningless if a court can impose treatment while concealing the very diagnosis on which the order rests. As seen in Appendix H, Petitioner's treating psychologist warned the court that treatment for a non-existent diagnosis would cause harm. Yet the court mandated treatment for a false diagnosis by letting the evaluator's report go unrebutted and sealed from Petitioner.

A mandate based on secret, unrebutted, unverified evidence cannot satisfy due process. Under *Mathews v. Eldridge*, 424 U.S. 319 (1976), the profound liberty interests at stake, bodily integrity and parental rights, require heightened safeguards.

Court's order amounted to legal coercion over Petitioner's body. Compelling treatment for a non-existing diagnosis strip away autonomy, risks bodily harm, and

effectively functions as legal slavery, in which the state dictates medical control without a need or consent or recourse. Patients' Bill of Rights further protects a patient's ability to seek a second opinion, which presupposes access to the diagnosis itself.

IV. Dismissing An Appeal On Jurisdictional Grounds And Threatening Sanctions Chills The Constitutional Right To Petition For Redress

On April 30, 2025, Appellate Court dismissed Petitioner's appeal claiming lack of jurisdiction, then issued an unsolicited warning that future appeals could result in sanctions. Petitioner's motion to reconsider argued that the denial of Dr. Finn's report as a *pro se* litigant had never been reviewed, but the court refused to consider it. Appellate court also did not explain how it lacks jurisdiction on recently issued orders from trial court which involves constitutional right violation. Appellate Court has never opined on the denial of Dr. Finn's report to Petitioner both as a *pro se* or a represented party.

The First Amendment protects the right to petition the courts. U.S. Supreme Court has emphasized that procedural rules must not be applied mechanistically to defeat the ends of justice as seen in *Chambers v. Miss.*, 410 U.S. 284.

U.S. Supreme Court has held the right to petition as seen in *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996) and *BE&K Constr. Co. v. NLRB*, 536 U.S. 516, 532 (2002). Grave denial of constitutional rights to two minor children and Petitioner is a life-altering

issue created by the trial court and not the *pro se*. As *Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982), makes clear, the denial of a hearing on claims implicating fundamental rights is itself a due process violation.

V. National Importance and Need for Guidance: Family-Court Use of Sealed Evaluations and Pro Se Access to Courts

This case presents a question of national significance: whether family courts can create a two-tiered system, depriving parents and self-represented litigants of fundamental parental rights through secret evidence and procedural traps. The constitutional violations are stark here: reliance on a sealed psychological evaluation used to effectively terminate parenting time while finding innovative ways to deny the parent access to the very evidence used against her. The appellate court's dismissal on technical grounds, with sanction threats, chills the right to petition when parental interests are paramount. See *Haines v. Kerner*, 404 U.S. 519 (1972)

Petitioner faced retaliation through Respondent's numerous attempts to secure sanctions, to have her labeled as vexatious litigant and to falsely claim order of protection violations. While these attempts have not yet succeeded, they have imposed a significant litigation burden on Petitioner, compounding the grave constitutional injuries she and her minor children continue to endure.

This story is not just Petitioner's; it is that of countless parents forced to proceed *pro se* due to financial devastation from litigation and separated from their children through violations of their constitutional rights.

CONCLUSION

The questions presented are evidence of a national crisis within the family justice system that harms our most vulnerable population: minor children. Reports state the number of affected children reaches into millions, not merely thousands. Only this Court can stop the ongoing injury inflicted upon countless children and parents through constitutional violations.

For the foregoing reasons, Petitioner prays that the petition for a writ of certiorari be granted.

Respectfully submitted,



Sossamma George Sebastin, *Pro Se*,

13268 West Heiden Circle,

Lake Bluff, IL 60044

sossammag@yahoo.com