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No.

**In the
Supreme Court of the United States**

Supreme Court, U.S.
FILED

JUL 27 2026

OFFICE OF THE CLERK

DIANA REISMANN SEXTON, *Petitioner*,

v.

FORT BEND COUNTY ET. AL., *Respondents*.

**On Petition for Writ of Certiorari to
the Court of Appeals of Texas,
Forteenth District
Case 14-25-00510-CV**

WRIT OF CERTIORARI

BAILIFF JOSE FALCON
DEPUTY GABRIEL CARDENAS
DEPUTY CONNOR GREEN
DEPUTY BRUCE ROSS
DEPUTY COX
DEPUTY CALLIE
DEPUTY WILLIAMS
DEPUTY MOORE
DEPUTY ORESKOVICH
DOCTOR DANIELLE TODARO
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QUESTIONS PRESENTED

1. Whether a visiting federal judge's ultra vires issuance of a child-custody and property order in a Texas state family-law proceeding, in excess of the limited authority conferred by 28 U.S.C. §§ 294 and 371, combined with the subsequent forcible separation of a mother from her child and the infliction of severe physical and mental suffering by county officials acting without any judicial order, violates peremptory norms of international law (*jus cogens*) and the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT).
2. Whether systematic alteration of court orders, deletion or editing of surveillance video, and fabrication of records by state judges and county counsel after a litigant reports irregularities to the Federal Bureau of Investigation constitute fraud upon the court under Federal Rule of Civil Procedure 60(b)(3) that voids subsequent dismissals and requires independent federal scrutiny.
3. Whether a dual-national mother and her Argentine-born child possess an enforceable right under CAT Articles 1, 2, 4, 13 and 14, and under the Alien Tort Statute, 28 U.S.C. §1350, and 42 U.S.C. §1983, to an independent investigation and full reparation when public officials, acting under color of law, inflict tactical tortures, permanent physical injuries, and threats against the child without any valid judicial authorization.
4. Whether fraudulent, ultra vires, or otherwise spoiled judicial acts or rulings in domestic-relations cases in lower state or federal courts that result in the infliction of torture or other violations of peremptory norms (*jus cogens*) against an innocent parent or child can ever be treated as valid due process when the parent was present in the courtroom with the child, had not attempted to flee, and was simply exercising the right to report judicial irregularities; or whether, because courts exist as administrators of justice and not as instruments of punishment or torture, such rulings and the resulting acts

or false cases against a parent or a child must be declared void *ab initio* and the responsible government employees removed from office for conduct that exceeds any claim of excessive force and violates non-derogable international obligations binding on the United States.

5. Whether the practical absence of an effective civil remedy in Texas for victims of official torture, resulting from the combination of qualified immunity, sovereign immunity, procedural barriers, and the knowing enforcement of an ultra vires judicial order, violates the United States' obligations under Articles 2, 13, and 14 of the Convention Against Torture to ensure prompt investigation and full reparation for acts of torture committed under color of state law.

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OPINIONS BELOW

The Texas Supreme Court denied petition of review for case 26-0587 on 07/17/2026, reported unpublished and is appended. State court opinions from the 240th District Court case 23-DCV-296547 and Forteenth Court of Appeal case 14-25-00510-CV are appended.

JURISDICTION

This Court has jurisdiction under 28 U.S.C. §1257(a). The petition presents substantial questions arising under the Constitution, federal statutes, including 28 U.S.C. §§294, 371, 1350 and 42 U.S.C. § 1983, and treaties of the United States, including the Convention Against Torture and the Vienna Convention on Consular Relations. Among other treaty violations, respondents recorded conversations of former Argentine Consul Alejandro Garcia and Petitioner, in violation of Articles 35 and 36 of the Vienna Convention on Consular Relations, which protect the freedom of communication of the consular post and the right of consular officers to communicate freely with nationals of the sending State.

This Court has jurisdiction under 28 U.S.C. §1254(1). The judgment below was entered on 7/17/2026 no petition for rehearing was filed. This petition is timely filed by Supreme Court Rule 13.

STATEMENT OF THE CASE

On 13 August 2019, visiting federal Judge Terence Kern, acting in designation under 28 U.S.C. §§ 294 and 371, issued an *ultra vires* order in Texas state family Cause No. 19-DCV-264966 awarding custody of Petitioner's then-eleven-year-old son and all marital property to the father. Petitioner went to Houston FBI building with her son and reported the incidents, petitioner son testified with the agent "*I want to live with her*"[sic], the agent directed petitioner to return to the court.

On September 18th, 2019, Petitioner appeared in the 505th District Court with her son (one month short of his twelfth birthday) and a Motion to Confer in Chambers prepared by University of Houston Law School Dean Judge Janet Heppard. Petitioner and her son had previously reported irregularities in the court to the FBI, where the child was videotaped stating that he wanted to live with his mother.

Petitioner was present in the courtroom with her son. She had not fled, had not attempted to leave the jurisdiction, and was not at any border. Attorney Christian Becerra (a consulted lawyer by petitioner) entered the courtroom, conferred privately with Falcon, and departed. Surveillance video later released by the Sheriff's Office had Becerra's appearance deleted.

After she informed the presiding judge that she had gone to the FBI, Bailiff Jose Falcon, without any judicial order or instruction, forcibly battered Petitioner, forced her into a stress position, knelt with his full body weight upon her arms and shoulders, forced her head downward, and handcuffed her any reasons or rights were ever stated by defendant Falcon.

Named deputies then subjected Petitioner to a series of acts that meet the definition of torture under CAT Article 1: forced nudity, denial of water and consular access, repeated impacts of her head against walls, over-extension of knees and shoulders causing permanent joint injuries, coercive injections, and threats directed at her child. These acts were inflicted as pure punishment after Petitioner exercised her right to report judicial irregularities. They cannot be characterized as necessary force to maintain order or prevent flight.

In the subsequent civil action Case No. 22-DCV-296547, Judges Surendran Patel and O'Neil Williams altered a court order after the hearing of January 3rd of 2023, changing its substance and adding signatures without a new hearing. County counsel served the altered order. Court records and video evidence were further manipulated. Petitioner was declared a vexatious litigant on an inaccurate count of prior actions; that declaration was later vacated in material part consistent with *Serafine v. Crump*, 691 S.W.3d 917 (Tex. 2024). All domestic remedies have been exhausted. The core *jus cogens* and CAT claims remain unresolved, as the State of Texas has not implemented for tortures.

SUMMARY OF THE ARGUMENT

This case presents the question whether the United States will tolerate the use of its lower courts as instruments of punishment and torture against an innocent parent who was present in a courtroom with her child and who had simply exercised her right to report judicial irregularities to the Federal Bureau of Investigation.

On 13 August 2019, a visiting federal judge, acting without authority under 28 U.S.C. §§ 294 and 371, issued an ultra vires custody and property order in a Texas state family-law proceeding. On 18 September 2019, while Petitioner stood in open court with her nearly twelve-year-old son, Bailiff Jose Falcon, without any judicial order, forcibly separated the child and subjected Petitioner to severe physical force. Named deputies then inflicted a series of acts that meet the definition of torture under Article 1 of the Convention Against Torture: forced stress positions causing permanent joint injuries, repeated head impacts, forced nudity, prolonged isolation, coercive injections, and threats directed at the child. These acts were pure punishment. Petitioner had not fled, was not at any border, and was not resisting a lawful order.

Subsequent judicial and prosecutorial actors compounded the violation by altering court orders after the hearing, deleting or editing surveillance video (including the appearance of Attorney Christian Becerra), fabricating records, and recording conversations of former Argentine Consul Alejandro Garcia in violation of Articles 35 and 36 of the Vienna Convention on Consular Relations. These actions constitute classic fraud upon the court under Federal Rule of Civil Procedure 60(b)(3).

The prohibition of torture is a peremptory norm of international law (*jus cogens*). The United States has demonstrated its capacity to enforce that norm extraterritorially, as shown by the conviction and seventy-

year sentence in *United States v. Ross Roggio*. The same seriousness must apply to official torture committed inland. Courts exist as administrators of justice, not as instruments of punishment. When fraudulent or *ultra vires* judicial acts result in torture against an innocent parent present in the courtroom with her child, those acts and the resulting proceedings must be declared void *ab initio*, the responsible officials removed, and an independent investigation and full reparation ordered under CAT Articles 13 and 14 and the Alien Tort Statute.

This Court should grant the writ to reaffirm that *jus cogens* and treaty obligations are not nullified by procedural barriers erected through fraud, and to restore the integrity of domestic-relations adjudication.

Finally, the *ultra vires* custody order issued by visiting Federal Judge Terence Kern on August 13th, 2019, which lacked any authority under 28 U.S.C. §§ 294 and 371 to decide a Texas domestic-relations matter, served as the triggering event for the subsequent forcible separation and acts of torture inflicted on Petitioner. Local officials, acting as the arm of the State of Texas, knew or should have known the clear limits on federal judicial authority in domestic-relations cases, yet enforced the void order against a mother present in open court with her child. Compounding this violation, Petitioner has been left without an effective civil remedy for official torture because of qualified immunity, sovereign immunity, successive procedural barriers, and the absence of a clear statutory pathway for victims of official torture under color of state law. This practical absence of meaningful redress, combined with the knowing enforcement of an *ultra vires* order, renders the subsequent proceedings void *ab initio* and demands independent federal scrutiny and full reparation under the Convention Against Torture.

ARGUMENTS

I. The *ultra vires* order of visiting Judge Kern, combined with the subsequent no-order separation and infliction of severe suffering, violates *jus cogens* and the Convention Against Torture.

A retired visitor federal judge may perform judicial duties only when properly designated under 28 U.S.C. §§294 and 371, and following Constitutional principles and State Court Rule. Nothing in those statutes authorizes a federal senior judge to exercise the powers of a Texas state district judge in a family-law matter. The order of August 13th of 2019 was therefore *ultra vires* from its inception.

The subsequent acts of September 18th of 2019 transformed that *ultra vires* order into a continuing violation of peremptory norms. Petitioner was present in the courtroom with her son. She had not attempted to flee and was not at any border. After she informed the court that she and her child had reported irregularities to the FBI, Bailiff Jose Falcon, acting without any judicial order, battered petitioner and applied severe physical force. Named deputies then subjected her to forced stress positions on the shoulders and knees, repeated head impacts against walls, forced nudity, persistent isolation, denial of water and consular access, coercive injections, and threats against the child, actions that are never mentioned on their duties, and runs against the Convention Against Torture (CAT) definition of torture in Article 1 “*the intentional infliction of severe physical and mental pain or suffering by public officials for purposes of punishment, intimidation, and coercion.*”

The prohibition of torture has attained the status of *jus cogens*. In *Barcelona Traction, Light and Power Company, Limited (Belgium v. Spain)*, 1970 I.C.J. 3, ¶¶ 33–34, the International Court of Justice recognized that certain obligations are owed by every State to the international community as a whole, including the basic

rights of the human person. The International Criminal Tribunal for the former Yugoslavia stated the rule with unmistakable clarity in *Prosecutor v. Furundžija*, Case No. IT-95-17/1-T, Trial Judgment (December 10th, 1998), 153–157: *“It should be noted that the prohibition of torture laid down in human rights treaties enshrines an absolute right, which can never be derogated from, not even in time of emergency... Because of the importance of the values it protects, this principle has evolved into a peremptory norm or jus cogens, that is, a norm that enjoys a higher rank in the international hierarchy than treaty law and even ‘ordinary’ customary rules.”*

The *jus cogens* character of the prohibition produces specific legal consequences: individual criminal responsibility, the duty of every State to investigate and prosecute, and the absolute invalidity of any domestic measure that purports to authorize or immunize torture. This Court has long recognized the same principle. In *Filartiga v. Peña-Irala*, 630 F.2d 876, 878, 884 (2d Cir. 1980), the Second Circuit held: *“We hold that deliberate torture perpetrated under color of official authority violates universally accepted norms of the international law of human rights, regardless of the nationality of the parties... Among the rights universally proclaimed by all nations... is the right to be free of physical torture.”* No domestic procedural action can extinguish a *jus cogens* obligation.

II. Systematic alteration of court orders, deletion of video evidence, and fabrication of records constitute fraud upon the court that voids subsequent dismissals.

After Petitioner reported the events of September 18th of 2019, the judicial process itself became a vehicle for further misconduct. Following the hearing of January 3rd of 2023 in Case No. 22-DCV-296547, Judges Surendran Patel and O’Neil Williams altered the court order that had been announced on the record. The altered written order changed the substance of the ruling and added signatures

without a new hearing, without notice to Petitioner, and without any opportunity to be heard. County counsel then served the altered order as if it were the authentic judgment of the court.

In addition, surveillance video from the 505th District Court was edited to remove the appearance and actions of Attorney Christian Becerra, who had entered the courtroom, spoken privately with Bailiff Falcon, and then departed immediately before Falcon battered against Petitioner. Clerk records were likewise manipulated, omitting or altering material entries that would have revealed the sequence of events and the lack of any judicial order authorizing the separation of Petitioner from her child or the force that followed.

These actions meet the classic definition of fraud upon the court under Federal Rule of Civil Procedure 60(b)(3). As this Court held in *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944), fraud that seriously affects the integrity of the judicial process renders the resulting judgment void. Judgments and procedural barriers procured by such fraud cannot stand, and they cannot be used to extinguish a claim arising under *jus cogens* norms or to deny the remedies required by Articles 13 and 14 of the Convention Against Torture.

III. The ultra vires custody order, the Hague Convention, and the misapplication of criminal authority in a civil proceeding.

The ultra vires order of August 13th, 2019 awarded custody of Petitioner's Argentine-born son to the father. Its practical and intended effect was to lock the child into the United States and to foreclose return to Argentina, the country of the child's birth and habitual residence.

The Hague Convention on the Civil Aspects of International Child Abduction, implemented in the United States by the International Child Abduction Remedies Act (ICARA), 22 U.S.C. §§ 9001 et seq., requires the prompt

return of a child who has been wrongfully retained in a Contracting State so that custody may be determined in the country of habitual residence. By exercising state domestic-relations jurisdiction in a manner that permanently retained the child in the United States, the *ultra vires* order operated in direct conflict with the United States' treaty obligations under the Convention and ICARA.

United States law contains a significant structural gap. 18 U.S.C. § 1204 criminalizes only the removal of a child *from* the United States or the retention of a child *outside* the United States. There is no parallel federal criminal statute that addresses the wrongful retention of a child *inside* the United States under the same parental-kidnapping framework. Outside the limited civil process created by the Hague Convention and ICARA, there is no general federal statute that affirmatively requires or facilitates the return of children who have been retained in the United States — whether by a parent, a non-parent, or in circumstances that may involve trafficking. This statutory silence leaves a serious enforcement and remedial vacuum.

The officials who enforced the *ultra vires* order and inflicted severe force upon Petitioner treated her presence in the courtroom with her son, and her efforts to seek the child's return, as if they constituted a criminal offense. Yet § 1204 does not criminalize a parent's presence in a U.S. court with her child, nor does it prohibit or create any barrier to the return of a child who has been wrongfully retained inside the United States. The child's Argentine birth and later Consular Report of Birth Abroad are civil matters under the Immigration and Nationality Act; they create no criminal liability under § 1204. The child was never a refugee or asylum seeker, and no claim for refugee or asylum status was ever made or adjudicated. There was therefore no immigration-based legal ground that could justify permanent retention of the child in the United States or the use of force against Petitioner.

When government officials, acting under color of law, apply the machinery of criminal enforcement and physical force in a civil domestic-relations setting to punish conduct that § 1204 does not prohibit, and simultaneously use an *ultra vires* custody order to defeat the return obligation imposed by the Hague Convention, their actions lack lawful authority. The claimed legal basis collapses under scrutiny. The absence of a clear statutory remedy for inbound retention does not authorize law enforcement or courts to invent criminal liability or to disregard the United States' treaty obligations. It underscores, instead, the importance of faithful application of the civil framework that does exist — the Hague Convention and ICARA — and the danger of substituting force and pretext for law.

The seven years of subsequent litigation, characterized by *ultra vires* orders, alteration of court records, and unresolved claims of torture, far exceed the requirement of prompt return under the Hague Convention and the requirement of prompt investigation under Articles 12 and 13 of the Convention Against Torture.

IV. Petitioner and her child possess an enforceable right under CAT and federal statutes to an independent investigation and full reparation.

CAT Articles 13 and 14 require every State Party to ensure that any individual who alleges torture has the right to a prompt and impartial examination of the claim and to fair and adequate compensation, including full rehabilitation. The Alien Tort Statute, 28 U.S.C. §1350, and 42 U.S.C. §1983 provides domestic vehicles for that remedy.

The United States has demonstrated both the capacity and the will to enforce the prohibition of torture when the acts occur outside its territory. In *United States v. Ross Roggio*, No. 3:18-cr-00097 (M.D. Pa.), a federal jury convicted a U.S. citizen of torture and conspiracy to commit

torture under 18 U.S.C. §§ 2340–2340A and sentenced him to seventy years of imprisonment. That prosecution shows that the United States takes seriously its CAT obligations with respect to extraterritorial conduct. The same seriousness must apply to acts of torture committed by public officials inside the United States. A nation that vigorously prosecutes torture abroad while failing to provide effective remedies for official torture committed within its own territory creates an indefensible double standard.

V. Fraudulent or ultra vires judicial acts that result in torture against an innocent parent present in the courtroom cannot be treated as valid due process and must be declared void *ab initio*.

Courts exist as administrators of justice, not as instruments of punishment or torture. When a parent is present in the courtroom with her child, has not attempted to flee, and is simply exercising the right to report judicial irregularities, the subsequent infliction of severe suffering cannot be characterized as necessary force. Because the prohibition of torture is peremptory, any judicial act or ruling that enables or results in such suffering is void *ab initio*. The responsible government employees must be removed from office for conduct that exceeds any claim of excessive force and violates non-derogable international obligations binding on the United States.

In addition, the recording of conversations of former Argentine Consul Alejandro Garcia violated Articles 35 and 36 of the Vienna Convention on Consular Relations, further demonstrating official disregard for treaty obligations protecting freedom of consular communication and contact with nationals of the sending State.

VI. The ultra vires custody order, combined with the practical absence of an effective civil remedy for official torture in Texas, leaves

Petitioner without the redress required by the Convention Against Torture.

On 13 August 2019, visiting federal Judge Terence Kern, acting without proper designation under 28 U.S.C. §§ 294 and 371, issued an *ultra vires* order awarding custody of Petitioner's Argentine-born son and all marital property to the father. That void order became the predicate for the forcible separation of mother and child and the subsequent acts of torture inflicted on September 18th, 2019.

The Convention Against Torture requires every State Party to take effective legislative, administrative, and judicial measures to prevent torture (Article 2), to ensure that any individual who alleges torture has the right to a prompt and impartial examination of the claim (Article 13), and to ensure that the victim obtains fair and adequate compensation, including full rehabilitation (Article 14).

In this case, those obligations have not been fulfilled in practice. Petitioner has been forced to litigate under general civil-rights and tort statutes that are heavily constrained by qualified immunity, sovereign immunity, and successive procedural barriers, including a vexatious-litigant designation later vacated in material part. The knowing enforcement of an obviously *ultra vires* order by local officials, followed by alteration of court records and deletion of video evidence, further obstructed any meaningful investigation or remedy.

The result is a systemic gap: while the United States vigorously prosecutes torture committed abroad, as demonstrated by *United States v. Ross Roggio*, a victim of official torture committed under color of state law inside the United States can be left without an effective domestic pathway for investigation and reparation. This practical failure raises a substantial question under the Convention Against Torture and the Supremacy Clause.

This Court should grant certiorari to hold that when an ultra vires judicial act triggers official torture and the subsequent proceedings are tainted by fraud upon the court and immunity doctrines that preclude meaningful redress, the resulting judgments are void and independent federal scrutiny and full reparation are required.

VII. This Court should establish clear precedent that torture is never permissible within any territory under United States jurisdiction.

The facts of this case present an opportunity for this Court to affirm that the prohibition of torture applies with equal force to acts committed by government officials inside the United States as to acts committed abroad; that ultra vires judicial orders and subsequent official violence cannot be sanitized by procedural maneuvering; and that when torture occurs, the only lawful response is independent investigation, removal of the responsible officials, and full reparation to the victims. Such a holding would be fully consistent with *Filartiga*, *Furundžija*, *Barcelona Traction*, the text of the Convention Against Torture, and the United States' own demonstrated capacity to prosecute torture under 18 U.S.C. §§ 2340–2340A.

For these reasons, the petition for a writ of certiorari should be granted, the judgments below vacated, and the case remanded for an independent investigation and full reparation consistent with CAT and *jus cogens*.

REASONS FOR GRANTING CERTIORARI

I. The petition presents recurring and important questions concerning the enforceability of *jus cogens* norms and treaty obligations against official torture committed within the United States.

This case raises the fundamental question whether the prohibition of torture, a peremptory norm of international law, applies with equal force to acts committed by government officials inside the United States as to acts committed abroad. The United States has

demonstrated its capacity and willingness to prosecute torture extraterritorially, as shown by the conviction and seventy-year sentence in *United States v. Ross Roggio*. Yet when severe physical and mental suffering is inflicted by public officials inland, lower courts have repeatedly raised procedural barriers that leave the victims without an effective remedy. The double standard undermines both the United States' compliance with the Convention Against Torture and its credibility in the international community. Only this Court has the authority to resolve whether *jus cogens* and CAT require meaningful investigation and reparation for official torture committed within United States territory.

II. The case involves the proper limits of judicial authority and the consequences of *ultra vires* action in domestic-relations proceedings that affect international treaty obligations.

A visiting federal judge, under 28 U.S.C. §§ 294 and 371, issued a custody order in a Texas state family court that permanently retained an Argentine-born child in the United States and foreclosed return to the country of habitual residence. That *ultra vires* order conflicted with the United States' obligations under the Hague Convention on the Civil Aspects of International Child Abduction and its implementing statute, ICARA. The subsequent use of force against the mother, who was present in the courtroom with her child and had not attempted to flee, further compounded the violation. This Court has not addressed the consequences when an *ultra vires* judicial act in a domestic-relations case is used to defeat treaty-mandated return of a child and is then enforced through severe physical force.

III. The petition presents an important question of fraud upon the court and the integrity of the judicial process.

After the mother reported the events to the FBI, court orders were altered after the hearing, surveillance video was edited to remove a key participant, and clerk records were manipulated. These actions constitute classic fraud upon the court under Rule 60(b)(3). Lower courts nevertheless treated the resulting judgments as valid

barriers to relief. This Court should clarify that judgments procured by such fraud are void and cannot be used to extinguish claims arising under *jus cogens* norms or to deny the remedies required by the Convention Against Torture.

IV. The decision below conflicts with fundamental principles governing the relationship between criminal statutes, civil treaty obligations, due process, and the failure to implement CAT-compliant remedies.

Officials treated the mother's presence in court with her child and her efforts to seek the child's return as if they constituted a criminal offense under 18 U.S.C. § 1204. That statute, however, criminalizes only outbound removal or retention outside the United States. It does not prohibit inbound retention or a parent's presence in a U.S. courtroom. By applying criminal-style force in a civil proceeding to punish conduct the criminal statute does not forbid, and by using an *ultra vires* custody order issued by visiting Federal Judge Terence Kern to defeat the Hague Convention's return obligation, the officials acted without lawful authority. The resulting forcible separation and acts of torture were followed by years of procedural barriers that left Petitioner without an effective remedy. Compounding this violation, the State of Texas has never enacted civil remedies legislation. This systemic gap raises a recurring and nationally important question: whether the United States can satisfy its non-derogable obligations under the Convention Against Torture when a constituent state provides no dedicated pathway for victims of official torture and when state actors knowingly enforce *void ultra vires* orders. The seven years of subsequent litigation further violated the requirements of prompt return under the Hague Convention and prompt investigation under CAT. This Court should grant review to prevent the misuse of criminal authority in civil domestic-relations cases, to reaffirm that treaty obligations cannot be nullified by pretextual enforcement, and to resolve the conflict between *jus cogens* norms, treaty obligations, and the practical barriers that currently deny meaningful redress.

V. The questions presented are of national and international importance and are cleanly presented. The issues in this case recur whenever local officials, operating

under color of law, inflict severe suffering in the course of family-court proceedings and then rely on procedural barriers to avoid accountability. The petition cleanly presents the conflict between *jus cogens* and treaty obligations on the one hand, and ultra vires judicial action, fraud upon the court, and the absence of effective domestic remedies on the other. Resolution of these questions will provide needed guidance to lower courts and will affirm that the prohibition of torture admits of no territorial exception within the United States.

CONCLUSION

The petition of Certiorari should be granted. The judgments below should be vacated, and the case remanded for an independent investigation and full reparation consistent with the Convention Against Torture, the *jus cogens* prohibition of torture, the Hague Convention on the Civil Aspects of International Child Abduction, and the fundamental requirements of due process.

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