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ORIGINAL

No. _____

In the
Supreme Court of the United States

Linh Tran Stephens,

Petitioner,

v.

Adam Sylvester Stephens, et al.

Respondents.

ON PETITION FOR WRIT OF CERTIORARI TO
THE OKLAHOMA COURT OF CIVIL APPEALS

PETITION FOR WRIT OF CERTIORARI

Supreme Court, U.S.
FILED

AUG - 2 2025

OFFICE OF THE CLERK

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SEPTEMBER 03, 2026

QUESTIONS PRESENTED

1. Whether the Due Process Clause permits a State to incarcerate a parent whose indigency its own courts have affirmed, for civil contempt based on nonpayment of child support, without any inquiry into her present ability to pay, without proof that her noncompliance was willful, and without consideration of alternatives to incarceration.
2. Whether a civil-contempt proceeding that imposes a determinate jail sentence, conditioned on a purge amount the contemnor has been found unable to pay, is criminal in nature, requiring proof beyond a reasonable doubt and the related criminal-process protections.
3. Whether the Double Jeopardy Clause permits a second contempt prosecution, and a longer term of incarceration, for the same alleged debt of child-support arrearage while the first contempt judgment remains pending on appeal.
4. Whether a court, in a contempt proceeding that may result in incarceration, violates the privilege against self-incrimination by instructing the factfinder to draw an adverse inference from the contemnor's silence.
5. Whether the Full Faith and Credit Clause permits a state court to modify a sister State's final judgment that expressly waived cash child support in exchange for a stipulated transfer of property.
6. Whether due process permits incarceration for contempt where the lawfulness of the disobeyed order is an element of the offense under state law, yet the trial court barred the accused from contesting it.

7. Whether due process permits a State child-support agency to act as levying creditor and reviewing adjudicator of its own levy—seizing and irrevocably liquidating a retirement account of *nonparty*'s marriage, *before* retirement age and by agency letter bearing no judge's name, signature, seal, or file stamp, rather than by any court order or qualified domestic relations order—and to issue a written decision sustaining that levy *before* the administrative hearing the agency itself had scheduled to review it was ever held.
8. Whether due process permits a judicial officer to serve simultaneously as accuser and adjudicator in contempt proceedings resulting in incarceration, over the defendant's timely and continuing objections.
9. Whether the Due Process Clause and Title II of the Americans with Disabilities Act permit a state court to bar a non-English-speaking pro se defendant from presenting exculpatory evidence or jurisdictional defenses through a pretrial *Motion in Limine* and trial-time limits that counted interpreter time against her.
10. Whether the First Amendment's Speech, Free Exercise, and Petition Clauses permit a state court, on pain of terminating all mother-child contact, to prohibit a birth mother—directly or through court-appointed supervisors—from photographing or reporting her female offspring's visible injuries, petitioning for redress concerning the child's safety, or sharing God's Word, including “Armor of God,” with her.

LIST OF PARTIES

A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

Petitioner:

1. Linh Tran Stephens

Respondents:

1. Adam Sylvester Stephens
2. State of Oklahoma, Department of Human Services, Child Support Services (CSS).

RELATED CASES

Pursuant to Rule 14.1(b)(iii), the following are related proceedings:

*** *Origin Judgment (county Columbia, Oregon state):***

1. *In the Matter of the Marriage of Co-Petitioners Adam Sylvester Stephens and Linh Tran Stephens*, Case # 15DR18623, Stipulated General Judgment of Dissolution of Marriage and Money Award, finalized January 8, 2016 (Judge Callahan, Cathleen B). This is **the final judgment** whose Full Faith and Credit is at issue (*Question 5*).

*** *Supreme Court of the United States:***

2. *Linh Tran Stephens v. Oklahoma Department of Human Services., Child Support Services*, No. 26-5320 (10th Cir. No. 25-5063) [retirement levy ¶6]
3. *Linh Tran Stephens v. Child Support Services of Oklahoma et al.*, App. # 25A913

*** *Oklahoma appellate proceedings from county Tulsa, Oklahoma state:***

4. *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: DF-120612;
5. *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: CI-120847;
6. *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: DF-120848;
7. *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: DF-120849;
8. *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: DF-121149;
9. *Linh Tran Stephens v. Deborrah Ludi Leitch*, Case #: PR-121200;
10. *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: DF-121254;
11. *Linh Tran Stephens v. Judge Deborrah Ludi Leitch*, Case #: MA-121255;
12. *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: DF-122022;
13. *Linh Tran Stephens v. April Seibert, Deborrah Ludi Leitch, Todd Chesbro, Dawn Moody, ALL SPECIAL JUDGES*, Case #: MA-122445;

14. *Linh Tran Stephens v. CITY OF TULSA, OKLAHOMA, AND DEPARTMENT OF HUMAN SERVICES*, Case #: MA-122859;

*** UNITED STATES COURT OF APPEALS FOR THE TENTH CIRCUIT:**

15. *Stephens v. Parks, et al.*, Appellate Case: 24-5138 [legal malpractice case];

16. *Stephens v. OKDHS et al.*, Appellate Case: 25-5063 [401(k) theft, POA fraud];

17. *Stephens v. State of Oklahoma*, case No. 26-5040 [G.S.' habeas];

18. *Stephens v. State of Oklahoma*, case No. 26-5041 [Linh's habeas];

*** U.S. DISTRICT COURT NORTHERN DISTRICT OF OKLAHOMA:** (*federal actions brought under 28 U.S.C. §§ 1331, 1343, 1350; 42 U.S.C. §§ 1983, 1985, 1986*)

19. *Stephens vs. Sparkman et al.*, case No. 22-CV-0480-CVE-JFJ;

20. *Stephens vs. Seibert et al.*, case No. 23-CV-553-GKF-SH;

21. *Stephens v. Child Support Services of Oklahoma Department of Human Services et al.*, case No. 24-CV-216-JDR-CDL;

22. *Stephens v. Parks et al.*, case No. 24-CV-259-GKF-MTS (legal malpractice);

23. *Stephens v. State of Oklahoma et al.*, 4:25-cv-00285 (habeas for Linh);

24. *Stephens v. State of Oklahoma et al.*, 4:25-cv-00286 (habeas for biological firstborn female offspring GLS);

25. *Stephens v. State of Oklahoma et al.*, 4:25-cv-00322 (civil rights, tort, FTCA);

*** STATE COURTS OF OKLAHOMA:**

26. FAMILY AND DOMESTIC DIVORCE WITH MINOR CHILDREN, FD

DOCKET C and FD DOCKET F: *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: FD-2015-2228;

27. JUVENILE COURT: *IN RE MINOR G.S.*, whose safe mother is Linh Tran

Stephens and unfit/unsafe father is Adam Sylvester Stephens: JD-2021-270;

28. OKLAHOMA HUMAN SERVICES DEPARTMENT, CHILD SUPPORT SERVICES, against fit/safe mother Linh, OK IV-D FGN: 000948641001;
29. OKLAHOMA HUMAN SERVICES DEPARTMENT, CHILD PROTECTIVE SERVICES, CPS Case #: 20652909, CPS referral # 2078246 & 2200561 against Adam Sylvester Stephens for child abuses among many other CPS referrals by nonparties since 2017 against ADAM, while false # 2195835 against Linh;
30. OFFICE OF ADMINISTRATIVE HEARING (OAH): *STATE OF OKLAHOMA v. Linh Tran Stephens*, OAH No.: 23-00313-73;
31. *Linh Tran Stephens, G.S., et al. v. Adam Sylvester Stephens*: PO-2021-3843;
32. *Adam Sylvester Stephens v. Linh Tran Stephens*, Case #: PO-2021-4059;
33. SMALL CLAIMS COURT, *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: SC-2023-956;
34. CIVIL DOCKET C, *Linh Tran Stephens v. Adam Sylvester Stephens*, Case #: CJ-2023-1901;
35. *Adam Sylvester Stephens v. Linh Tran Stephens*, Case #: PO-2023-4019;
36. *Linh Tran Stephens v. STATE OF OKLAHOMA, EX REL. OKLAHOMA DEPARTMENT OF HUMAN SERVICES, ROBERT PERUGINO, EMMALENE STRINGER, JANE/JOHN DOE 1-10*, Case #: CV-2024-1311;
37. *Linh Tran Stephens vs. STATE OF OKLAHOMA EX. REL. DEPARTMENT OF HUMAN SERVICES, DHS Claims # 2520034513*;
38. *STATE OF OKLAHOMA v. STEPHENS, LINH*, Case #: CM-2022-157 (false VPO by Adam, dismissed almost 2 years later as his perjury was impeached);
39. *STATE OF OKLAHOMA v. STEPHENS, LINH TRAN*, Case #: CM-2022-285 (false VPO by Adam, dismissed after he admitted to perjury, false police report);

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Bible - as it is written and as surely as YAHUAH lives:

Acts 10:34; Isaiah 10:1	39, 40
Deuteronomy 19:15; Exodus 8:1 & 9:1; Ezekiel 18:4; Galatians 6:7; Genesis 12:3; Isaiah 54:17; Isaiah 61:8; John 8:36; Luke 11:52; Psalm chapters 35-37; Psalm 105:15; Psalm 109:17; Psalm 127:3	39

IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully petitions this Court to issue a Writ of Certiorari in the
interest of justice and of proper jurisdiction

OPINION BELOW

Unpublished opinion of Oklahoma Court of Civil Appeals in Case No. DF-122022, filed **March 7, 2025**, is reproduced at *Appendix A* (“App. A”) 2a-14a. Oklahoma Supreme Court's order denying certiorari filed **June 16, 2025** appears at App. A 15a. The mandate issued **July 10, 2025**, together with related docket sheet, at App. A 16a-22a. Tulsa County District Court of Oklahoma pronounced its two-month incarceration order in open court on **February 7, 2024**, and Petitioner was jailed that same hour. The written order of imprisonment required for appeal was not docketed until **March 14, 2024**—five weeks after the pronouncement, and two weeks before her release on **March 28, 2024**, having served the full term without purging. (App. B 23a-28a; App. C). With that judgment pending on appeal, the same court imposed an additional six-month term by written order of **May 8, 2025**. The order issued from a **May 2, 2025 hearing** that excluded the specially appearing Defendant, her virtual ADA advocates, and the public. (App. B 30a-33a; App. II).

Oklahoma's *Order Modifying Decree of Dissolution of Marriage*, entered **February 20, 2024**, is reproduced at App. NN. The *Oregon Stipulated General Judgment of Dissolution of Marriage*, Case No. 15DR18623, entered **January 8, 2016**—which provides “Jeep and Trailer in lieu of child support”—is reproduced at App. H.

JURISDICTION

Oklahoma Court of Civil Appeals issued its opinion in the latest appeal arising from orders entered in FD-2015-2228, docketed as Case No. DF-122022, on *March 7, 2025* (App. A 2a-14a). Oklahoma Supreme Court denied certiorari on *June 16, 2025* (App. A 15a). No petition for rehearing was filed. This Court has jurisdiction under 28 U.S.C. § 1257(a). *February 2024* contempt judgment is final upon that denial. *May 8, 2025* contempt judgment is likewise the judgment of "the highest court of a State in which a decision could be had," § 1257(a), because no further state review is available to Petitioner (§36, *infra*). *Thompson v. City of Louisville*, 362 U.S. 199, 202 (1960). A State may not erect an unconstitutional wealth barrier to its own appellate courts, *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996), and then invoke the very review it denied as a reason this Court cannot act.

This petition is timely under Supreme Court Rule 13.1 and the successive sixty-day correction periods granted by the Clerk under Rule 14.5. See *Houston v. Lack*, 487 U.S. 266 (1988). The Clerk's letter of *July 16, 2026* states that this petition was originally postmarked *August 2, 2025*, within ninety days of *June 16, 2025*. Petitioner's correspondence with this Court began *March 25, 2024* persistently without being late, transmitted from the David L. Moss Criminal Justice Center and bearing this Court's stamp "Received *April 12, 2024*." Petitioner has withdrawn nothing and abandoned nothing, and today also transmitted correspondence to the Clerk under separate cover, with documentary enclosures, preserving my position as to matters not presented here. The present submission is made within the period granted by latest letter of *July 16, 2026*.

The Eleventh Amendment poses no bar to this Court's review. Appellate review under 28 U.S.C. § 1257(a) of a judgment rendered by a State's own courts is not a "suit commenced or prosecuted against" a State within the meaning of that Amendment. *Cohens v. Virginia*, 19 U.S. (6 Wheat.) 264, 407-12 (1821); *McKesson Corp. v. Div. of Alcoholic Beverages & Tobacco*, 496 U.S. 18, 26-31 (1990). Respondent CSS appeared, litigated, and prosecuted the contempt below.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Every provision cited below is reproduced at App. PP per *Rule 14.1(f)*:
Constitutional: U.S. Const. amends. I (speech, religion, petition), IV (unreasonable seizure), V (due process, double jeopardy, self-incrimination, takings), VI (counsel, jury, confrontation), VII (civil jury), VIII (excessive bail, cruel and unusual punishment), XIII (involuntary servitude/peonage), XI, XIV, § 1 (due process, equal protection); art. III, § 1 (judicial power); art. IV, § 1 (Full Faith and Credit). **Federal statutes:** 29 U.S.C. §§ 1056(d)(1), 1144 (ERISA); 28 U.S.C. § 1738B; 15 U.S.C. §§ 1673, 1692 et seq.; 42 U.S.C. §§ 652(k), 654(4), 657, 659, 666(f), 1983, 12132; 18 U.S.C. §§ 241, 242; 18 U.S.C. §§ 1341, 1343, 1344, 1512, 1519, 1961-1968, § 666. **State statutes:** 20 O.S. §§ 123, 124; 22 O.S. § 983(A)(2); 43 O.S. §§ 118B(D), 118D, 601-101 to 601-903. **International Treaties and Agreements:** United Nations Convention Against Torture (UNCAT), Articles 2 and 16 (cruel, inhuman, or degrading treatment); International Covenant on Civil and Political Rights (ICCPR), Article 12 (right to travel); Hague Convention on Civil Aspects of International Child Abduction.

STATEMENT OF THE CASE

Introduction. This petition presents urgent federal questions arising from the systematic dismantling of an indigent Vietnamese national mother's constitutional

rights in Oklahoma family court: repeated contempt incarceration without ability-to-pay hearings (App. *B, C, Z*); refusal to enforce a binding Oregon decree waiving child support in lieu of transferred properties (App. *H, NN*); the seizure and irreversible liquidation of a retirement account—funded entirely after the Oregon decree, during a marriage to a non-party who owes no support—executed by agency letter without any court order, and upheld by the agency's own written decision issued before the hearing it had scheduled to review it (App. *D, QQ*); a 4.5-year severance of birth-mother-firstborn-offspring contact without a warrant or proof of harm (App. *F, V, N*), despite the father's admissions establishing Petitioner's fitness since Nov. 28, 2017 (App. *TT*); preemptive exclusion of all defenses via a motion in limine unlawfully filed by the state to block exculpatory evidence (App. *OO*); and denial of ADA accommodations (App. *AA, II*). These patterns implicate ERISA, the Full Faith and Credit Clause, Article III, the Due Process, Double Jeopardy, Thirteenth Amendments, and the UN Convention Against Torture. *This Court's intervention is the sole remaining remedy, as all other avenues of relief have been exhausted.*

republic: South Carolina)
county of Newberry) ss.

I, Linh Tran Stephens—one-and-only Authorized Representative/Agent, attorney-in-fact, and secured party creditor¹ of LINH TRAN STEPHENS©™—am an Ambassador of YHWH (יהוה), a 'free [nonblack] person,' and a stateless Vietnamese national, one of the People of a Union guaranteed a Republican Form of Government, U.S. Const. art. IV, § 4; I have never knowingly been a U.S. citizen under 8 U.S.C. §

1401. My natural rights derive from the Bill of Rights; I am neither a negro/slave nor a descendant of such. My firstborn female offspring (biological property), G.S., shares this natural status, which anchors our constitutionally protected mother-child relationship and my fundamental parental rights to her care, custody, and companionship—rights subject to due process and, at minimum, proof by clear and convincing evidence under *Santosky v. Kramer*, 455 U.S. 745 (1982). *Meanwhile*, our legal entities, LINH TRAN STEPHENS©™ and G.S.©®, are Fourteenth Amendment U.S. citizens under 8 U.S.C. § 1401(a), deriving standing from its privileges and immunities. Termed 'persons' in plural usage, these artificial entities were created approximately two weeks after our live births and fall under the definition of a 'person' per 8 U.S.C. § 1101(b)(3). These entities were assigned EIN/Social Security Numbers used on the original notes, pursuant to 26 C.F.R. § 301.7701-11. Under the Uniform Commercial Code, LINH TRAN STEPHENS©™ and G.S.©® are represented persons, account holders, and issuers of the original notes, whose sole secured party creditor¹—for both—is the living woman, Linh Tran Stephens.

A. Jurisdictional Challenge

1. Oklahoma lacks jurisdiction to modify Oregon child support decree because: (1) Petitioner is a Vietnamese national, not U.S. nor Oklahoma's citizen, employee, or public-servant; (2) Petitioner permanently resides outside STATE OF OKLAHOMA's jurisdiction, domicile near republic land of South Carolina, but uses maildrops in Oklahoma sometimes as traveler through there; (3) Jurisdictional objections filed many times (App. JJ); (4) Oregon decree contains governing-law clause (App. H); (5) Petitioner appeared by special entry of appearance due to threats

¹ See UCC-1 Filing trust account 260217-1425000 in MARYLAND

of imprisonment and of never allowed to see my kidnapped-by-CPS offspring again; I have not ever consented to jurisdiction in any aspects (App. *U*, Non-waiver of Rights); **(6)** Deprivation of unalienable rights requires Article III court. These defects render all orders void *ab initio* yet it enforces void orders causing continual harms.

B. Background and Marriage

2. I, Linh Tran Stephens, married Adam Stephens on May 17, 2012. I served five years in U.S. Navy Medical Corps, later worked at VA and Cherokee Nation Clinics until layoff in September 2020 (App. *Z*).

3. My first born female offspring G.S. was born in 2013 to that marriage.

C. Oregon Divorce Decree and Full Faith and Credit—*RES JUDICATA*

4. Our January 8, 2016 Oregon decree (Case No. 15DR18623) established 50/50 custody with "unhampered access" and stipulated **"Jeep and Trailer in lieu of child support" five times** (App. *H*). I registered this foreign decree in Oklahoma July 11, 2017 (App. *G*) to be enforced against Adam's custodial interferences. Tulsa County judges initially affirmed its binding status, but successors in December 2021 disregarded it & violated Full Faith and Credit when I sought enforcement. Adam fraudulently altered 28-page decree, adding 10 pages (compare original App. *H* with *altered* App. *G*); and Oklahoma issued an unauthorized modification order February 20, 2024 without jurisdiction or consent (App. *NN*). (Question Presented 5).
Marriage 1: Adam Stephens; ended Jan. 8, 2016. Only marriage producing G.S.
Marriage 2: Current husband; married Nov. 20, 2017. Ongoing. No divorce, no support case, no obligation, not a party to FD-2015-2228, no child in common with anyone in this litigation.

D. Custodial Interference and Financial Abuse Predating State's Overreach

5. In 2019-2020, Adam committed custodial interference by withholding G.S. from me for four (4) consecutive months—conduct meeting the elements of parental kidnapping—while simultaneously refusing to reimburse his half of G.S.'s medical and dental expenses as required by the Oregon decree. I fully performed the "Jeep and Trailer" obligation. Adam received and exercised full ownership rights over both assets: as to the Trailer, he personally executed the notarized July 17, 2017 settlement conveying it and shared its proceeds, the lien paid in full and the loan closed July 19, 2017 with a zero balance (App. UU). Both instruments were before the trial court, filed October 17, 2022 in FD-2015-2228 (App. Q, later sealed unlawfully), and were never rebutted. Having monetized the Trailer under his own signature (App. UU), Adam retained its entire benefit. My repeated requests to Oklahoma courts sought only enforcement of the binding Oregon decree—never modification. Oklahoma instead rewarded Adam's documented kidnapping, financial abuse, and later-substantiated child abuse by stripping custody from me and conferring it on him, while simultaneously "modifying" the very decree I asked it only to enforce. This is the origin of every downstream violation in this petition. *I have never filed a motion for child support modification, requested child support from state, consented to state's exercise of parens patriae authority, or qualified for SSA Title IV-D benefits.*

6. I married my current husband on November 20, 2017, and we remain continuously married. He is a stranger to this case: he owes no child support, no support obligation ever arose from our marriage, and he has never been a party to any proceeding. The Cherokee Nation ("CN") Health Services 401(k) at issue was *opened and funded entirely during that second marriage*, from my own

employment from August 2018 through September 30, 2020 (App. QQ-7)—beginning more than two and a half years after the Oregon decree became final on January 8, 2016. Not one dollar in it was earned during the marriage to Respondent Adam Stephens; it was never marital property, never within the Oregon court's reach, and never the subject of any qualified domestic relations order. When the account was rolled over in September 2020 when I was laid off by CN, the plan required and obtained my non-party husband's notarized written consent (App. QQ-5, QQ-6)—the plan itself recognized a spousal interest. *Neither he nor I ever assigned, pledged, or signed over any interest in that account to the State of Oklahoma or to any child-support obligation.* On May 7, 2024, seven liquidations totaling \$64,445.92 were executed (App. QQ-1, QQ-2)—*two days before* the administrative hearing the agency had itself scheduled for May 9, 2024 to review the very levy it had already executed (App. QQ-3). Because the funds were liquidated *before retirement age* for both of us, the loss was compounded by immediate taxation and early-withdrawal penalty *and cannot be undone by any later ruling.* No court issued the levy; it issued as an agency letter over the CSS Director's signature block, bearing no judge's name, no autograph, no seal, and no file stamp (App. D). Property was gone before hearing began; the hearing was a nullity. (Question Presented 7).

7. On October 5, 2017, I served *Requests for Admission* on Adam Stephens in FD-2015-2228. He and his attorney never responded, and by order entered November 28, 2017 (OSCN Doc. 1038854849), the district court deemed them admitted—including that I am a fit and proper parent to be awarded sole custody of G.S. (App. TT). Under 12 O.S. § 3236(B), a deemed admission is "conclusively established" unless withdrawn or amended; no such motion was ever filed, heard, or granted. Yet every

custody-stripping order in this same case—the December 3, 2021 warrantless removal with zero exigent/emergency circumstance (App. *F*), the December 8, 2021 transfer of sole custody to unsafe father (App. *S*), and the February 20, 2024 modification (App. *NN*)—contradicts the opposing party's own binding, unwithdrawn judicial admission of my fitness. The State never proved me unfit by clear and convincing evidence, *Santosky v. Kramer*, 455 U.S. 745 (1982); the record conclusively establishes the opposite. A court may not presume unfitness, *Stanley v. Illinois*, 405 U.S. 645 (1972)—still less adjudicate it against a party whose fitness the Obligee-Respondent himself conclusively admitted. *Conduct Order* (2020) against Adam (App. *X*; ¶13, *infra*; Doc. #1048071356) confirms it: the concerns before this same court ran against Adam, never me—twice the record established my fitness, in 2017 and 2020.

E. Abuse Allegations and Custody Disputes

8. From 2017-2021, I documented Adam's abuse of G.S. Seven notarized professional affidavits and child's drawings (App. *V*) expressed serious concerns about Adam—*forehead hematomas & ecchymoses* (bilateral forehead contusions and swelling; photographs and sworn physician observation of record in FD-2015-2228, Docs. #1054150627 & #1053740028; see ¶40(a)), two months without bathing (App. *N*), sexual grooming (possibly sexual abuse), physical abuse, dog-strangulation—while expressing zero concerns about my parenting: (a) Child psychologist Dr. Jim Lovett (30+ years) expressed extreme concern, authenticated G.S.'s diary, and recommended full custody to me (App. *V(iv)*); (b) Nurse Practitioner Jeri Townsend received G.S.'s disclosures of sexual abuse, physical abuse, and dog-strangulation (App. *V(i)*); (c) School director Ms. Martin-Wingo (App. *V(v)*) and (d) teacher Ms. Panzer documented concerning behavioral changes after time with father

(App. V(vi)); (e) Dr. Moris Laca confirmed appropriate parenting by mother and child's distress discussing father (App. V(ii)); (f) Church deacons Carl and Helen Johnson confirmed my parenting capabilities (App. V(vii)).

9. G.S. attended Miss Helen's Private School from age three, read two grade levels ahead, and began her diary at ages 7-8 on instruction of child psychologists Short and Lovett. Entries from *July 2020-June 2021*—authenticated by Dr. Lovett, corroborated by contemporaneous video of G.S. dictating to Siri unaided (in ROA) and admitted into evidence 12-20-2022 (App. N, T)—document her abuse disclosures² (full diary at App. N).

10. The father/Adam knowingly put our female offspring's life at risk by not using seat belts or car seats, transporting her in a Slingshot at age 5. See Parenting Coordinator Kevin Gassaway's report documenting safety concerns (App. W)—ignored by all Oklahoma judges (all state and federal ones).

11. A GAL report by Valerie Blackstock recommended full custody to me due to father's disregard for child safety but was ignored by all judges and OKDHS. Special

² “i love mommy 100%, i love daddy 1%... happy 4th of July. It's about freedom and i wish To be free from daddy. i don't love daddy because he makes me sleep naked and he took a picture of me naked and he made me sit on other peoples laps and he took me to the swimming pool others man try to touch me. July 21, 2020, when is my prayer answered? and why is daddy not dead yet and i want freedom from daddy. July 22, 2020 i feel happy because i'm with mommy. August, 8th 2020... He told me not to take a shower when my shower time comes. Why is daddy angry all the time? I'm scared to say i Love mommy or i miss mommy in front of daddy. He usually scream at mommy and lie about mommy. [drawing of] evil Heart Lady Alice in wonderland [labeled as] daddy... August 9, 2020 Daddy again today told me “I'm going to talk to the attorneys about this” after i told him i have to go take a shower. i explain to him my own bedtime routine since forever and need to shower at 08:15 so i can fall asleep by 9 but he won't listen and got mad and again threaten me with attorneys [drawing of dad with horns and mom with halos]... September 1, 2020 Last week i slept with daddy multiple nights more than half the week and he didn't stop me. Now i am with mommy yay. September 17, 2020 Last tuesday, daddy forgot me at school and school closed...”

Judge April Seibert dismissed this GAL and appointed new GAL Stephen E. Hale instead, despite my objections regarding his conflicts of interest and history of child abuse via accomplice and via complicity in other cases e.g. Heather Collins.

12. In May 2020, after G.S.' adult-friend called OKDHS when G.S. disclosed father took her to "*swim around naked men who tried to touch her*" and "*made her sleep naked with him,*" OKDHS fraudulently accused me of failure-to-protect (though I hadn't lived with father since 2014). Six CPS referrals by bystanders against Father across state lines were ignored. The original *DHS Investigation Report* against Adam Stephens (App. E, 05-02-2020, 25 pages, at 41a-66a) documented serious concerns. OKDHS case worker *whistleblower* Maria Chico testified under oath that her original report had been truncated by her supervisor. See "OKDHS Report to District Attorney Approved 02-16-2022" (App. E).

13. In 2020, facing a second termination of his parental rights (his rights to a prior 15-year-old female offspring having been terminated in Oregon), Adam—through counsels and GAL Stephen E. Hale—induced me and OKDHS to waive trial before Judge Morrison in exchange for the *Agreed Order of Parental Conduct and Education* entered November 9, 2020, Doc. #1048071356 (App. X), containing eighteen decreed prohibitions: sleeping naked with the child, striking her, medical, dental, and educational neglect, and transporting her without restraints, including in a Slingshot (cf. App. W). I relied on that promise in good faith. He violated every material term (§§8-12, 14), yet the same court later awarded him sole custody.

14. In November 2021, eight-year-old G.S. tearfully disclosed that Adam (her father) had choked her dog nearly to death in front of her and that she feared for her

life also. A police report was filed (App. *T*, Tulsa Police Department Incident Report #2021060000, 11-23-2021), and a verified protective order followed, PO-2021-3843.

15. December 3, 2021, Oklahoma Child Protective Services abruptly removed G.S. from my safe custody without a warrant, criminal charges, documented evidence, or credible witnesses, placing her in foster care—a seizure of a person without a warrant, exigency, or probable cause, contrary to the *Fourth* and *Fourteenth Amendments* (App. *F*, Emergency Custody Order 'ORDER TO TAKE MINOR CHILD INTO EMERGENCY CUSTODY'). *Roska ex rel. Roska v. Peterson*, 328 F.3d 1230, 1247-51 (10th Cir. 2003). Convicted felon Bridget O'Brien (also known as Bridget Kay Menser) falsely alleged G.S. was forced to watch inappropriate movies with 'rape scenes' (factually a PG-13 film). Her perjurious affidavit is reproduced at App. *O*, and my detailed objections and corrections are at App. *P*. When confronted with evidence disproving these claims, the caseworker fabricated escalating accusations, from adult pornography to child pornography YET refusing to call FBI as I demanded. Despite evidence contradicting these claims—including school staff for testimony that G.S. was happy and healthy with me—the court removed G.S. from my custody and continues to withhold her.

16. On December 7, 2021, the court continued emergency custody of G.S. Under "REASONABLE EFFORTS," the order recites the sole ground: "THERE IS AN ONGOING FD CASE AND A GUARDIAN AD LITEM WHO REQUESTED THE CHILD BE PLACED IN OKDHS CUSTODY UNTIL THE PO AGAINST MR. STEPHENS CAN BE DISMISSED BY JUDGE DOSS." App. *R*, 211a. No harm by Petitioner is found or alleged. The stated ground is dismissal of the protective order G.S. had filed against the father fourteen days earlier. PO-2021-3843 (Nov. 24, 2021).

The same form records eight appearances, including four attorneys, and leaves the lines for Court Reporter and Interpreter blank. *Id.* at 210a. The next day the court held a separate hearing, of which Petitioner and G.S. had no notice and at which were impossible for them to be present. The order records two appearances—Kim Jantz for the State and caseworker Bridget O'Brien—and none for any parent, for counsel, or for the child. App. S, 219a. It recites as the basis for release that "Emergency Protective Order 21-3843 was dismissed," states that "[t]here are no objections by the parties," and releases G.S. to "Adam Stephens, natural father, without DHS supervision." *Id.* at 220a. The condition named on December 7 was satisfied on December 8, and the 8.5 year-old passed to the man her protective order was against.

17. At *June 1, 2022* emergency-custody hearing (Transcript or "Tr." 6/1/2022), OKDHS caseworker Bridget O'Brien (also known as convicted felon Bridget Kay Menser, Tulsa County CF-1999-2911, involving harm to minors) admitted under oath that she: (i) refused to review any of electronic devices Petitioner voluntarily offered (*id.* 21:5-8), (ii) did not need to because "*We go by the word of the kid*" (*id.* 98:10-17), (iii) saw no signs of porn in Petitioner's home (*id.* 99:10-12), (iv) *nonetheless substantiated the allegation* (*id.* 99:13-14), and (v) had her police-referral declined by law enforcement for insufficient evidence (*id.* 99:20-24). She also stated on arrival at my home, "*I know you're guilty just by looking at you.*" At the time she substantiated finding against me, *Ms. O'brien held a prior criminal record under her maiden name Menser in Tulsa County Case No. CF-1999-2911, involving harm to minors.* These sworn admissions establish a reckless and deliberately indifferent investigation in which exculpatory evidence was knowingly refused and disregarded—conduct the Tenth Circuit has squarely held is not shielded

by qualified or absolute immunity. *See Pierce v. Gilchrist*, 359 F.3d 1279, 1298-99 (10th Cir. 2004); *Snell v. Tunnell*, 920 F.2d 673, 687-93 (10th Cir. 1990); *Roska*, 328 F.3d at 1247-51; *Malik v. Arapahoe County Dep't of Soc. Servs.*, 191 F.3d 1306, 1314-15 (10th Cir. 1999) (no absolute or qualified immunity for fabricated or recklessly procured removals, or for investigative and administrative acts).

18. At the same *June 1, 2022* hearing, my counsel called OKDHS Child Welfare Specialist Maria Chico, an **OKDHS whistleblower**, who had conducted the 2020 investigation of the same family and who testified under oath that OKDHS reports "touches multiple hands at times" through supervisor review before finalization, Tr. 6/1/2022 at 173. My counsel sought to elicit Ms. Chico's direct testimony that the 2020 CPS report—*which had identified several and serious concerns as to Adam Stephens the Father and no concerns as to me/Mother*—was materially altered and partially deleted by her DHS supervisor before being converted from "substantiated" to "unsubstantiated" as to the known-abuser biological father *Adam Stephens (whose rights to his other teenage female offspring from a prior marriage had previously been terminated at her biological age of 15 by DHS—a fact documented by Oregon Juvenile Court Orders but disregarded by OKDHS even when served with proof)*, and offered the testimony to show a pattern of retaliatory tampering going directly to the credibility of the 2021 substantiation against me. Mr. Pilkington (opposing counsel) and Mr. Hale (G.A.L.) objected on relevance grounds and the trial court sustained all of those objections, expressly excluding this evidence as "not relevant," *id.* at 175:1-8 and 176:8-17, thereby foreclosing my only means of putting the DHS supervisor's alteration of exculpatory evidence before the fact-finder. The exclusion of this testimony—core

exculpatory proof offered through the very caseworker who had authored the original report—deprived me of my right to present a complete defense and of meaningful notice and opportunity to be heard, in violation of the Due Process Clause of the Fourteenth Amendment. See *Chambers*, 410 U.S. at 302; *Holmes*, 547 U.S. at 324; see also *Paine v. Massie*, 339 F.3d 1194, 1201 (10th Cir. 2003) (exclusion of defense evidence violates due process where it would have created reasonable doubt).

19. Guardian ad Litem Stephen E. Hale, Esq. testified at the *June 1, 2022* hearing that he *personally* initiated the DHS referral leading to my first born female offspring G.S.'s removal/seizure without warrant based predominantly on an eight-year-old's *alleged-by-GAL-only* statements during two brief meetings about the movie "Taken," Tr. 6/1/2022 at 105-107 which was contrary to what child actually disclosed to child experts and physicians and mandatory reporter (that "best mommy in the world...", App. N, App. V), and admitted he "had no idea" that Petitioner and *competent 8.5 year-old G.S. herself together had filed a verified Protective Order against G.S.'s father* (PO-21-3843, filed Nov. 24, 2021) expressly to protect herself (G.S.) and her dog and her cat, learning of it only "right on top of the hearing," id. at 108:22-109:3, 111:16-20. Mr. Hale conducted no independent investigation, adopted Ms. O'Brien's substantiation without examining any exculpatory evidence, and recommended foster care and then child-abusive paternal placement in reliance on it, id. at 113:1-10. ***Timeline sequence is itself evidence: November 23, 2021***, police report against father (App. T); ***November 24, 2021***, Petitioner and G.S. filed their verified Protective Order against him (PO-21-3843); ***December 3, 2021***, G.S. was seized from Petitioner without warrant (App. F); ***December 8, 2021***, custody passed to the accused father in an unrecorded meeting (App. S); ***December 13, 2021***,

the father filed his counter-protective-order—which Mr. Hale admitted "was the vehicle to secure ... custody in Mr. Stephens." Tr. 7/24/2023 at 12:10-12. In nineteen days, the parent who petitioned for protection lost the child to the abusive parent. On cross-examination July 24, 2023, Mr. Hale admitted a split-percentage billing structure in which one parent's payments were "only reflected on her part," but couldn't provide any wet-ink contract that Petitioner/Mother allegedly voluntarily agreed to pay 100% of it. Tr. 7/24/2023 at 41:21-42:13; an hourly rate of \$225-\$250, id. at 44:19-24; and, asked about financial conflicts with the presiding judge or her firm, answered only "I'm not aware of one," id. at 97:2-5. Because Mr. Hale performed investigatory and recommendation functions—not functions "intimately associated with the judicial phase"—he is not entitled to absolute immunity. *Snell; Pierce; Malik* (10th Cir. 1999). Neither Mr. Hale nor the court disclosed this financial relationship at his appointment, at the emergency-custody proceedings removing G.S., or at any point before Petitioner's July 24, 2023 questioning—depriving her of the impartial tribunal guaranteed by the Fourteenth Amendment. *In re Murchison*, 349 U.S. 133, 136 (1955) ("A fair trial in a fair tribunal is a basic requirement of due process.").

G.S. has never been heard by any judge, in camera or otherwise; no forensic interview; no recording. Petitioner subpoenaed her and made an offer of proof that G.S. would authenticate her own diary and testify to her father's abuse. The court refused to permit her to appear. The State's case rested entirely on the child's out-of-court statements, relayed by two financially conflicted adults, while every means of testing them was closed. She is now thirteen. Under 43 O.S. § 113, a child twelve or older is presumptively of sufficient age to be heard. Oklahoma has never heard her, and still will not. (Question Presented 6, 8).

20. Adam Stephens' sworn testimony contains two irreconcilable contradictions on the record. *First*, on *July 24, 2023*, when asked by the Court whether he knew that false statements in a protective-order affidavit are a crime, he swore "No, I was not," Tr. 7/24/2023 at 209:14-18; on *February 1, 2024*, confronted with that testimony, he swore he "Knew that for quite a while," Tr. 2/1/2024 at 78:14-22. One statement is necessarily perjury under *21 O.S. § 491*. *Second*, GAL Hale—who had stated to me he required a \$1,000 retainer to appear as a witness—testified Mr. Adam Stephens paid him \$250 to secure his appearance, Tr. 7/24/2023 at 37:8-38:6; Mr. Stephens denied it three times, *id.* at 200:12-201:2, prompting the Court's own finding: "*It's clear to the Court he doesn't have any idea what he paid the man.*" *Id.* at 202:3-5. The custody and contempt orders rest materially on the credibility of a party the presiding judge herself found contradicted—compromising the evidentiary foundation of every subsequent order (Full excerpts at App. *RR*). A judgment resting on testimony the State knew or should have known was false, or procured by suppressing material exculpatory evidence, cannot stand. *Napue*, 360 U.S. at 269; *Brady*, 373 U.S. 83; *Glossip*, 604 U.S. 226.

F. Void *Ab Initio* Child Support Enforcement and Contempt Proceedings

21. *Each appearance was executed as a special, limited, and restricted appearance under threat, duress, coercion, while publicly preserving Petitioner's express and continuous jurisdictional objections on records (App. FF, JJ, and U).*

22. Over the next four plus years, Oklahoma courts systematically violated my rights by: (a) Prohibiting all contact with G.S. unless I paid \$150/hour for supervised visits with restricted physical contact, speech, and religion (forbidden from speaking Vietnamese or discussing Christianity). Court-appointed therapeutic supervisors

threatened to terminate all visits if I photographed G.S.'s visible injuries or asked about her safety; and before my June 1, 2022 testimony, State prosecuted two misdemeanor charges (VPOs) against me arising from the father's unadjudicated protective-order (CM-2022-157, CM-2022-285), both later dismissed. (Question Presented 10); **(b)** Imprisoning me for two months (App. B, Incarceration Order dated 03-14-2024; App. C, Release from Custody Order dated 03-28-2024) for inability to pay alleged debts (which I never borrowed nor consented to) and its fraudulently alleged fees and compounded interests, with the judge stating "you have the key to your jail cell" by paying impossible sums, forcing me to serve my full sentence; **(c)** During contempt proceedings, Special Judge instructed the jury that my Fifth Amendment invocation should be interpreted as evidence of guilt, stating in effect that the burden now shifts to the defendant to prove her innocence--violating rights (App. FF, *Writ of Quo Warranto*). (Question Presented 4).

23. The arrearage underlying both incarcerations has never been validated by any competent accounting, and the State's own records show it cannot be. **First**, the obligation was discharged by accord and satisfaction: the Oregon decree's "Jeep and Trailer in lieu of child support" provision (App. H) was fully performed and never rebutted (§5, *supra*; App. UU), extinguishing the antecedent obligation as a matter of contract law. No subsequent accord, consideration, or consent ever converted that satisfied provision into a cash obligation. The decree's Money Award states that the "[p]arties request that no funds be exchanged for Child Support." App. H, 135a. The guideline worksheet figure of \$586.00 was expressly superseded by the stipulation. *Id.* at 138a. **Second**, even on the terms of the void February 20, 2024 modification order (App. NN), the State's ledger charges Petitioner support for May through July

2020—months the same court's own order placed G.S. in her emergency custody. The court is billing her for months the offspring lived with her. **Third**, the imputation is doubly defective. The court imputed full-time physician-level income from 2021 forward with no evidentiary finding nor any witnesses of voluntary unemployment or underemployment, as 43 O.S. §§ 118B(D), 118D require—disregarding Petitioner's sworn *Declaration of Earnings* (App Q is its excerpts), filed October 17, 2022 and unlawfully sealed, establishing her post-layoff status as a non-salary 1099 earner (FD-2015-2228, Oct. 17, 2022; in ROA), and her un rebutted IRS records (App. Z). Yet the same court simultaneously declared her mentally incapacitated to parent (§30(d), *infra*). Both cannot be true. A debt that (i) rests on a discharged obligation, (ii) bills the obligor for months of her own custody, and (iii) is computed on income the court's own findings render impossible is not a validated debt. Imprisonment upon it is debtor's prison for a fabricated civil debt—precisely what *Bearden* and *Turner* forbid and what DOJ's Dear Colleague Letters warned state courts against. (Question 1).

24. May 30, 2023, the State filed a *Motion in Limine* (App. OO) seeking to prohibit Defendant from presenting 42 of her 44 designated exhibits and from arguing jurisdictional defenses. Despite my timely Objection filed June 2, 2023 (App. OO), the court granted the motion via minute orders on June 12, 2023 and August 14, 2023 (App. OO)—without issuing any written order explaining its reasoning. At trial, I was limited to presenting only 2 of 44 exhibits (App. OO) and was tried before a 6-member jury rather than the 12-member jury I demanded. OKDHS specifically demanded that I, the Defendant, “be prohibited from: (1) challenging subject matter jurisdiction; (2) raising UIFSA or Full Faith and Credit defenses regarding binding Oregon decree; (3) presenting evidence of child welfare investigations; (4) questioning the Guardian

Ad Litem; (5) addressing the father's mental health; and (6) referencing previous misconduct by parties or attorneys.” Deborrah Ludi-Leitch granted this motion, effectively silencing Defendant from presenting any defense to the contempt charges. This wholesale prohibition of jurisdictional challenges—which cannot be waived—and the exclusion of Oregon-decree-defense—which is the central issue—violated my First, Fifth, and Sixth Amendment rights. (Questions Presented 6, 9).

25. Trial from January 29 to February 2, 2024—custody, child support, ten-plus contempt counts spanning **seven years**—was confined to **a strict 10-hour countdown** covering direct, cross, redirect, my own testimony, *and* Vietnamese interpretation, while I faced six BAR attorneys alone, including Special Judge April Seibert functioning as ex-husband Adam's attorney while presiding. My filed **nine-page** closing argument *appears as two pages in the appellate record, DF-122022* (App. SS). Due process requires "the opportunity to be heard at a meaningful time and in a meaningful manner." *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (quoting *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970)). A 10-hour clock charging interpreter time against a non-English-speaking defendant is predetermined denial, compounded by accuser-adjudicator conflict. (Questions Presented 8, 9).

26. On February 6-7, 2024, a six-member jury trial was held before Special Judge Deborrah Ludi-Leitch regarding contempt charges for my inability to pay child support—jurisdiction of “special judges” that I challenged and refused to consent to. Pretrial, at trial, and posttrial, the court denied my requests to present evidence of fraud surrounding a child-support order that ignored my documented financial hardship, contradicted the binding Oregon decree, and imposed Title IV enforcement despite my ineligibility (Rule 8 denial, ¶28(a), *infra*). The jury returned a guilty

verdict as instructed directly by Special Judge Ludi-Leitch, sentencing me to *60 DAYS IN JAIL* and a purging fee of *\$12,413.40 IN CASH BOND*, despite my documented indigency (App. Z, Indigency Proof and IRS tax records from 2021-2023). Special Judge Ludi-Leitch maliciously denied my in-court request to serve my sentence on weekends—I wanted to work on weekdays to pay alleged fines—thereby causing my direct primary care clinic to close permanently, irreparable damage to my professional reputation, and worsening my inability to pay. At the end of the malicious hearing, I was taken into custody directly from the courtroom into the David L. Moss Criminal Justice Center without any booking process—no intake paperwork was provided to me and no fingerprints were taken—and I was not advised of my right to consular notification under Article 36 of the Vienna Convention on Consular Relations, to which both the United States and Viet Nam are parties, nor was the Consulate of Viet Nam notified. (Question Presented 2).

27. Special Judge Loretta Radford scheduled multiple hearings in May 2025 to retry me for the same offense—constituting double jeopardy while my appeal DF-122022 remained pending at that time (App. A, appeal timeline). These actions violate *res judicata* and reflect systemic abuse. May 8, 2025 Order sentenced me to an *additional six months* (App. B, Incarceration Order dated 05-08-2025). No state appellate review of that judgment has been possible: the September 30, 2024 order in No. MA-122445 (§36, *infra*) bars me from filing any new state proceeding without a cash deposit, so the May 8, 2025 judgment stands as the decision of the highest state court in which a decision could be had. *Thompson v. City of Louisville*, 362 U.S. 199, 202 (1960). Neither confinement rested on any affidavit of harm, allegation of violence, or claim that anyone required protection—both were imposed solely over

alleged debt. These violations are documented in App. *JJ* (State Orders with patterns of unconstitutional prosecution, double jeopardy and sealing of IFP). (Question 3).

G. Procedural Irregularities and Constitutional Violations

28. Oklahoma courts additionally denied: **(a)** *Rule 8 ability-to-pay hearings* mandated by Oklahoma law, asserting that "child support contempt cases are exempt from Rule 8 hearings" contrary to Oklahoma Supreme Court precedent (App. *MM*, Oklahoma Supreme Court Affirming Opinion DF-120849); **(b)** my demand for a twelve-person jury; six were seated, and they exhibited clear bias (high-fiving opposing counsel's assistant after my conviction); **(c)** Weekend-only sentencing request that would have preserved my medical practice; **(d)** Executed the retirement-account seizure detailed at ¶6, *supra*, by agency letter and without any court order, judicial signature, or pre-deprivation hearing (App. *D*, *QQ*).

29. While imprisoned at *David L. Moss Criminal Justice Center*, all female inmates were denied access to the law library via judges' verbal order while male inmates retained full access. I endured cruel and unusual punishment while serving an unlawful sentence. My Non-Waiver of Rights is documented at App. *U*.

H. Administrative Actions and Passport Revocation

30. Oklahoma also: **(a)** Blocked medical license renewal, followed by revocation, forcing permanent practice closure; **(b)** Revoked my passport by deliberately scheduling administrative hearings beyond statutory timeframes, preventing visits to terminally ill relatives and mission trips violating *Kent v. Dulles*, 357 U.S. 116 (1958); **(c)** Required an indigent mother to pay \$2,500-5,000 for a forensic interview despite documented unemployment; **(d)** Simultaneously imputed physician-level income while declaring me 100% disabled and mentally unfit; **(e)** Rejected a

Psychological Evaluation Report (08-12-2022) by a board-certified psychiatrist affirming my mental fitness to parent (App. *Y(i)*, 6 pages, at 293a-298a), insisting on a specific provider with financial connections to the court costing \$2,500. Therapeutic Supervised Visit Reports (09/2023-02/2024) reflecting zero concerns during supervised interactions were similarly ignored (App. *Y(ii)*, at 299a); and (f) Denying in forma pauperis status despite documented indigency (App. *Z*).

I. ADA Violations and Language Barriers

31. ADA accommodations were requested and denied. Dr. Jeremy Ransdell, D.O., documented chronic tinnitus and Petitioner's non-native English status on May 16, 2022, recommending advocate presence, transcripts, captioning, and recording; all were refused. App. AA(ii), 331a–332a. A formal ADA complaint filed August 7, 2023 by advocate Marieke Vekemans Randoy documented the same denials across hearings from January to June 2023. App. AA(i), 325a–330a. The December 7, 2021 order shows the pattern from the outset: eight appearances, four of them attorneys, with the Interpreter line blank. App. R, 210a. DOJ Dear Colleague Letters (March 14, 2016; April 20, 2023) and Executive Orders on parental rights were served on the same judges. App. GG.

32. Additionally, as documented meticulously in App. *II*, an ADA advocate present during the May 2, 2025, hearing provided a sworn affidavit detailing numerous egregious misconduct by Special Judge Loretta Radford, the Sheriff, and Bailiff during what should have been a public proceeding.

J. Continued Violations of Rights and Continued Inequality

33. I incorporate ¶¶14-17; none of it was tested adversarially. Attorneys I retained failed me—not filing emergency demands they were paid to file, waiving my rights

without consent, falsely representing "no objection" to filings I was never shown. On June 1, 2022, I dismissed all representation and have proceeded *sui juris* since.

34. Despite pending federal litigation challenging the levy (No. 24-CV-216-JDR-CDL), a Notice of Removal served on every presiding special judge (App. *LL*), a verified motion to enjoin the state proceedings (Doc. 54), and continuous jurisdictional objections preserved by special appearance, Oklahoma kept setting imprisonment proceedings—producing the May 2025 second contempt judgment and its 180-day sentence.

The disparity runs through one case, before the same judges. Adam Stephens—a white U.S. citizen—withheld G.S. for four months (§5), drew six CPS referrals (§12), lost parental rights to an earlier female offspring (§13), conclusively admitted Petitioner's fitness (§7; App. *TT*), violated the Conduct Order (App. *X*) that spared him a second termination (§13), and gave testimony the presiding judge found irreconcilable (§20). Arraigned for contempt in this same case, his not-guilty plea was accepted, his jury waiver honored, his bench warrant taken "under advisement" (Minute Order, July 29, 2020). He was never jailed. He was awarded sole custody. Petitioner—a Vietnamese woman, non-native English speaker, and Christian—on the same docket: twelve-juror demand cut to six, bench warrants executed, jailed twice, stripped of medical license and passport, denied ADA accommodations and interpreter time, allowed 2 of 44 exculpatory exhibits, and ordered to fund her false-accuser's counsel while adjudged too indigent to afford her own. Same court, same decree, same record—opposite hands. Equal Protection covers "all persons within the territorial jurisdiction, without regard to any differences of race, of color, or of nationality," and forbids law "applied and administered ... with an evil eye and an

unequal hand." *Yick Wo v. Hopkins*, 118 U.S. 356, 369, 373-74 (1886). This transgresses even Oklahoma's own Anti-Discrimination Act, 25 O.S. § 1101 et seq.—the State broke its own statute in tandem with the Fourteenth Amendment.

35. On 12/31/2024: I received a letter from Passport-CRBA-Notification@state.gov regarding the revocation of my passport and told me no available means to appeal except through DHS CSS; previous Denial letter 03/02/2023 (RE: 696669556).

36. On September 30, 2024, in No. MA-122445, the Oklahoma Supreme Court conditioned any further filing by Petitioner on payment of a cash deposit. It did not revoke her pauper status, find her finances changed, hold a hearing, take evidence, or state a reason. Her indigency was never contested and remains un rebutted. The same court had granted her pauper status in No. DF-120849 by order of January 23, 2023, over the opposing party's contest. On this identical record, every prior forum has recognized my indigency: IFP status was granted in every forum that adjudicated it on the merits (Oklahoma Supreme Court (DF-120849), N.D. Okla., and Tenth Circuit); counsel was appointed during contempt proceedings due to indigency, and my IRS records (App. Z) remain un rebutted. Petitioner has filed no state appeal since—by the impossibility the State created, not by waiver. A State may not condition access to its courts on the payment of money an indigent litigant cannot produce. *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996); *Boddie v. Connecticut*, 401 U.S. 371 (1971); *Griffin v. Illinois*, 351 U.S. 12 (1956). The bar is not a finding that Petitioner can pay. It is a requirement that she pay in order to be heard, imposed while the finding that she cannot remains undisturbed.

37. Under that bar, on February 12, 2025, I filed a Demand for Writ of Mandamus, No. MA-122859, to compel OSBI to investigate the documented abuses and

negligence of my offspring (App. I, J, K, L). Court sealed the *Mandamus* and its attached evidence; never served me; warned by *February 13, 2025 journal entry* of dismissal unless cost deposit was "SUBMITTED BY 2-8-25"—a deadline expired five days before it issued; then, dismissing on *March 24, 2025*, recited a different deadline, "on or before *February 28, 2025*" (App. M). Two records, one order, two dates: a deadline impossible when imposed, or a date supplied after the fact—cf. App. SS; ¶40(b). "A fair trial in a fair tribunal is a basic requirement of due process." *In re Murchison*, 349 U.S. 133, 136 (1955).

38. Oklahoma pursues federal Title IV-D incentive funds while demanding payment from an indigent parent who never applied for its services and never received them. No IV-D application, assignment of support rights, or receipt of public assistance by Petitioner appears anywhere in the record—the statutory predicates for the State's own enforcement interest under 42 U.S.C. §§ 654(4), 657. (Question 7).

K. Religious Discrimination and First Amendment Violations:

39. Oklahoma courts have discriminated against me based on my Christian faith in violation of Free Exercise Clause by: (a) treating my religious expressions as evidence of mental instability; (b) ridiculing my religious beliefs and using them against me in custody proceedings; (c) forbidding religious instruction—including teaching "**Armor of God**" (Ephesians 6:10-18)—during visits with my offspring, see *Wisconsin v. Yoder*, 406 U.S. 205 (1972); and (d) using my faith references in sworn testimony to negatively characterize my fitness as a parent. (Question Presented 10).

L. Ongoing Litigation and Lack of Adequate Remedy

40. On September 24, 2025, *Oklahoma Attorney General's Office of Civil Rights Enforcement* ("OCRE") formally recused itself from Petitioner's complaints and

issued a Dismissal concluding the matter (App. *BB*), explaining in writing that because Office of the Attorney General "also represents, defends, and counsels state agencies," recusal was required "[d]ue to the allegations and the parties involved" to eliminate "any risk of potential or actual conflicts"—the State's own acknowledgment that its civil-rights enforcement arm cannot investigate the state agencies Petitioner accuses. That admitted structural conflict, coupled with the Dismissal closing the avenue, negates any adequate state forum for these claims. Cf. *Middlesex County Ethics Comm. v. Garden State Bar Ass'n*, 457 U.S. 423, 432 (1982) (*Younger* abstention presupposes an adequate opportunity to raise constitutional claims in state proceedings). Petitioner exhausted *all* channels: **(a)** Oklahoma courts denied opportunities to present evidence despite 30+ motions (App. *JJ*), including two verified emergency-custody filings with photographic evidence of G.S.'s injuries by Adam and physician's sworn affidavit—12-01-2022 (Doc. #1054150627) and 12-02-2022 (Doc. #1053740028) both also at *LinhStephens.com*—summarily denied on 01-19-2023 without hearing, just like emergency motion dismissed by email without hearing on July 8, 2020, after the court reviewed the DHS records, with the show-cause hearing stricken and the DHS records directed to opposing counsel (Minute Order 07-08-2020); **(b)** Court transcripts altered compared to original recordings, FOIA requests for voice recordings denied; **(c)** Federal habeas petitions 4:25-cv-00285 (my habeas) and 4:25-cv-00286 (G.S. habeas) were unjustly dismissed January 21, 2026 (*Frizzell*) and January 22, 2026 (*Eagan*) respectively on threshold grounds without reaching the merits. Additionally, Petitioner's *Emergency Motion for Stay Pending Appeal and for Injunction Pending Appeal*, filed January 10, 2026 in Tenth Circuit (App. *HH*), was denied by order of January 16, 2026 (App. *HH*, Order of

01/16/2026)—closing last federal intermediate-appellate avenue and leaving this Court as the only remaining forum for emergency relief. This coordinated obstruction leaves this Court as the only viable relief.

M. How the Federal Questions Were Raised and Decided Below

41. Each question was raised in the district court by written objection and at trial, and in Petitioner's brief in chief in No. DF-122022. The Court of Civil Appeals reached the merits of Questions 2 and 4. It held that because a purge amount was set, the proceeding was civil and clear-and-convincing proof sufficed, App. A, 8a (¶11), and that the adverse-inference instruction was permissible because the proceeding was civil, *id.* at 6a-8a (¶¶8-10). Proposition three was decided without any finding of waiver. It also reviewed the challenged jury instruction for fundamental error, *id.* at 12a-13a (¶¶17-19). It denied Question 8 for failure to comply with Rule 15, *id.* at 9a (¶12), and denied the remaining propositions for failure to cite supporting authority under Okla. Sup. Ct. R. 1.11(k)(1), *id.* at 9a-12a (¶¶13-16), 13a (¶20). The Oklahoma Supreme Court denied certiorari June 16, 2025. *Id.* at App. A 15a.

REASONS FOR GRANTING THE WRIT

This petition does not ask the Court to review a custody dispute. It asks whether the Constitution limits a federally funded collection apparatus that computes debt, seizes asset, adjudicates its own seizure, and imprisons the debtor.

IMMEDIATE HARM & URGENCY: Petitioner faces six months' imprisonment under the May 8, 2025 order, on top of the two-month sentence imposed February 7, 2024 over her objections, for the same alleged nonpayment. The first carried a purge of \$12,413.40; the May 8, 2025 bench warrant set a cash bond of \$13,711.24; a third indirect contempt citation has been outstanding since August 21, 2025 (App. B, C,

JJ). Oklahoma appointed counsel for Petitioner—confirming her indigency—and in the *same* case ordered her to pay over \$6,000 and accruing for ex-husband's private attorney at \$350 per hour. Her medical license was revoked, her passport restricted, and her property lienied, none with a pre-deprivation hearing. Federal habeas petitions were dismissed on threshold grounds in January 2026 without reaching the merits; the appeals, Tenth Circuit Nos. 26-5040 and 26-5041, remain pending.

Neither deprivation can be remedied on plenary appeal. Incarceration is the paradigm—time served cannot be returned—and the loss of a constitutional right "for even minimal periods of time, unquestionably constitutes irreparable injury." *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (plurality); see *Nken v. Holder*, 556 U.S. 418, 434 (2009). The severance of Petitioner from G.S. is more irreparable still. The parent-child relationship, especially biological birth mother with firstborn female offspring, is "perhaps the oldest of the fundamental liberty interests recognized by this Court," *Troxel v. Granville*, 530 U.S. 57, 65 (2000), *Mirabelli v. Bonta*, 607 U.S. 492 (2026) (per curiam), and it "does not evaporate simply because" a parent has "not been [a] model parent[]," *Santosky v. Kramer*, 455 U.S. 745, 753 (1982). No judgment can restore to a mother her offspring's ninth to thirteenth year of life. G.S. has been separated from Petitioner for nearly five years without any finding of unfitness or criminal charges—indeed, against the father's own deemed admission of Petitioner's fitness, conclusive on the record since 2017. (§7; App. *TT*). The Oklahoma Supreme Court itself held that a parent's relationship with her child is a fundamental right that cannot be altered without due process. *Poppinga v. Wallace*, 2025 OK 17 (Okla. Mar. 4, 2025).

A. Summary of Argument

1) The contempt proceedings imposed punishment while withholding every protection punishment requires (QP 1-4). The contempt court appointed counsel for Petitioner on indigency, App. B, 24a; App. Z, 300a-324a, then jailed her twice for nonpayment without any finding of present ability to pay, without proof of willfulness, and without considering alternatives. *Turner v. Rogers*, 564 U.S. 431 (2011); *Bearden v. Georgia*, 461 U.S. 660 (1983). The February 2024 sentence was conditioned on a \$12,413.40 cash purge, but the contempt order contains no finding that Petitioner had the present ability to satisfy that purge. Under *Hicks v. Feiock*, 485 U.S. 624, 638 n.9 (1988), "[a] court may not impose punishment in a civil contempt proceeding when it is clearly established that the alleged contemnor is unable to comply with the terms of the order." The State then prosecuted her again and imposed a longer sentence for the identical arrearage while the first judgment was pending on appeal. Cf. *Barrett v. United States*, 607 U.S. 128 (2026). And the court instructed the factfinder to draw an adverse inference from her silence—permissible only if the proceeding was civil, and unconstitutional if it was not. *Griffin v. California*, 380 U.S. 609 (1965).

2) The underlying order was invalid, Petitioner was barred from proving it, and enforcement destroyed her property before any process at all (QP 5-7).

Oregon's final, stipulated judgment resolved child support by an express exchange—property in lieu of support, stated five times, and fully performed of record (App. UU)—and Oklahoma owed it full faith and credit, not modification. *V.L. v. E.L.*, 577 U.S. 404 (2016); 28 U.S.C. § 1738B. Under Oklahoma law, indirect contempt consists of "willful disobedience of any process or order **lawfully** issued or made by court," 21 O.S. § 565 (emphasis added)—lawfulness is an element of the offense. Yet

the trial court, by pretrial order, barred Petitioner from presenting any evidence or argument contesting that element, thereby directing a verdict for the State on an essential element and relieving it of its burden of proof, in violation of *In re Winship*, 397 U.S. 358 (1970), and *Sandstrom v. Montana*, 442 U.S. 510 (1979), and denying her right to present a complete defense under *Chambers v. Mississippi*, 410 U.S. 284 (1973). Even were lawfulness not an element, an order void for want of jurisdiction is a nullity that cannot support contempt, *United States v. United Mine Workers*, 330 U.S. 258, 293 (1947), and the collateral-bar rule presupposes an available forum to test validity—a forum Oklahoma itself closed. Enforcement then destroyed Petitioner's property before any process at all. OKDHS liquidated \$64,445.92 from a retirement account by agency letter bearing no judge's name, signature, seal, or file stamp, and issued its written decision sustaining that levy before the hearing it had itself scheduled to review it. App. D; App. QQ-1-QQ-3; ¶6, *supra*.

Due process requires notice and an opportunity to be heard **before** the deprivation, not a ratification after the asset is destroyed. *Fuentes v. Shevin*, 407 U.S. 67, 80-82 (1972); *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). And it forbids the same body to serve as creditor, prosecutor, and judge of its own claim. *Tumey v. Ohio*, 273 U.S. 510 (1927); *In re Murchison*, 349 U.S. 133, 136 (1955) ("no man can be a judge in his own case"); *SEC v. Jarkesy*, 603 U.S. 109 (2024). A tribunal that writes its decision before it hears is not a tribunal. What this Court forbade the SEC to do after a hearing, OKDHS did before any hearing at all. The defect is not inferred from the record—it is confessed on the face of the agency's own documents.

The seizure independently offends the anti-alienation policy Congress wrote into 29 U.S.C. § 1056(d)(1), *Boggs v. Boggs*, 520 U.S. 833 (1997), no QDRO having

ever issued, and the plan's own requirement of notarized spousal consent before any distribution (App. QQ-5, QQ-6) confirms the account was hedged with procedural protection even against its own owner—protection the State swept aside with none. But the due-process violation is complete without ERISA, and does not depend on it.

3) Tribunal was not impartial and the defendant was silenced (QP 8-10).

Over continuing objection, the same judicial officer served as accuser and adjudicator in proceedings ending in Petitioner's incarceration. "A fair trial in a fair tribunal is a basic requirement of due process," and no one "can be a judge in his own case." *In re Murchison*, 349 U.S. 133, 136 (1955); *Tumey v. Ohio*, 273 U.S. 510 (1927); cf. *SEC v. Jarkesy*, 603 U.S. 109 (2024). The court compounded this structural defect by using a motion in limine to bar a non-English-speaking pro se defendant from 42 of her 44 exhibits. The court's predecessor imposed an arbitrary ten-hour trial clock for over ten distinct contempt allegations—a mechanism that counted interpreter translation time against Petitioner and extinguished her remaining time to present a complete defense, contrary to *Chambers*, *Holmes v. South Carolina*, 547 U.S. 319 (2006), and Title II of the ADA, 42 U.S.C. § 12132. Finally, the court and its appointed supervisors prohibited a birth mother, on pain of losing all contact with her firstborn female offspring, from photographing, documenting, or reporting the child's visible physical injuries, and from petitioning for redress concerning her child's safety—a *prior restraint on truthful speech and on the right to petition* that the First Amendment does not tolerate.

B. The Decision Below Conflicts With This Court's Precedents on Questions This Court Expressly Left Open

1) *Turner's* holding, by its own terms, does not reach this case.

Turner held that due process does not automatically require counsel before a parent is jailed for nonpayment, but confined that holding to its facts: the Due Process Clause "does not require the provision of counsel where the opposing parent or other custodian (to whom support funds are owed) is not represented by counsel and the State provides alternative procedural safeguards." 564 U.S. at 448. Neither condition obtained here. Respondent Adam Stephens was represented by private counsel throughout, and OKDHS appeared through its own attorneys and prosecuted the contempt. The Court said so expressly: "We do not address civil contempt proceedings where the underlying child support payment is owed to the State... The government is likely to have counsel or some other competent representative. Cf. *Johnson v. Zerbst*, 304 U.S. 458, 462-463 (1938) ('[T]he average defendant does not have the professional legal skill to protect himself when brought before a tribunal with power to take his life or liberty, wherein the prosecution is presented by experienced and learned counsel'). And this kind of proceeding is not before us." *Id.* at 449. The Court's stated concern was trained government counsel on the other side of the table—present here regardless of who the arrears run to. Federal agency administering Title IV-D reads *Turner* the same way: in 2012 OCSE instructed the States that *Turner* left unresolved what due process requires where the other parent or the State is represented by counsel, and that the safeguards *Turner* identified may not then suffice. OCSE, AT-12-01, *Turner v. Rogers Guidance* (June 18, 2012). Nor is the conflict hypothetical; it is the one that brought *Turner* here, and it survives the half *Turner* resolved: "In light of differences among state courts (and some federal courts) on the applicability of a 'right to counsel' in civil contempt proceedings enforcing child support orders, we granted the writ. Compare *Pasqua v. Council*, 186 N.J. 127, 141-

146 (2006); *Black v. Division of Child Support Enforcement*, 686 A.2d 164, 167-168 (Del. 1996); *Mead v. Batchlor*, 435 Mich. 480, 488-505 (1990); *Ridgway v. Baker*, 720 F.2d 1409, 1413-1415 (5th Cir. 1984) (all finding a federal constitutional right to counsel...), with *Rodriguez v. Eighth Judicial Dist. Ct.*, 120 Nev. 798, 808-813 (2004); *Andrews v. Walton*, 428 So. 2d 663, 666 (Fla. 1983)." *Id.* at 435. Fifteen years later, the reserved half of that conflict has never been resolved. Whether an indigent parent is jailed with or without a lawyer still depends on which side of a state line she stands.

2) Oklahoma jailed Linh on a purge it had already found she could not pay.

A purge clause is what makes contempt civil, because it means the contemnor "carries the keys of his prison in his own pocket." *Hicks*, 485 U.S. at 633. That premise fails here, and Oklahoma must choose which failure it concedes. If the purge was genuinely available, the court was required to find present ability to pay. It made none. The order recites only that the purge "is set in the amount of \$12,413.40," payable "in cash/money order only," and that Petitioner appeared with court-appointed standby counsel. App. B, 24a. The Court of Civil Appeals nonetheless falsely held that "Mother had the ability to clear the contempt by paying the purge fee of \$12,413.40," App. A, 8a, citing nothing. The judgment thus rests on a finding no court made—the defect this Court identified in *Turner*, where the trial court "did not find that *Turner* was able to pay his arrearage, but instead left the relevant 'finding' section of the contempt order blank." 564 U.S. at 447-49. If the purge was not available, there were no keys, and *Hicks* is categorical: "A court may not impose punishment in a civil contempt proceeding when it is clearly established that the alleged contemnor is unable to comply with the terms of the order." 485 U.S. at 638 n.9. The sanction was punitive, the proceeding criminal in substance, and its

protections—proof beyond a reasonable doubt, *id.* at 631-635, and freedom from an adverse inference drawn from silence—were never afforded.

Oklahoma cannot have both. It cannot take the benefit of the civil label, including the burden-shift *Hicks* permits only in civil proceedings, *id.* at 637-641, while imposing a purge no court found her able to satisfy. The characterization is a question of federal law, *id.* at 630—the State's label does not settle it. Whether a facially present but factually unattainable purge preserves the civil character of a contempt is the question *Hicks* left open.

3) This Court has already reversed Oklahoma for these defects.

In *Glossip v. Oklahoma*, 604 U.S. 226 (2025), this Court set aside an Oklahoma judgment resting on testimony the State knew to be false and left uncorrected. The same pathologies are here, on paper: seven of the nine pages of Petitioner's filed closing argument are absent from the appellate record in DF-122022 (compare App. SS-1 with App. SS-2), and the Tenth Circuit ordered her evidentiary appendix "received but not filed" (Doc. 57, Oct. 2, 2025) and then dismissed her arguments as conclusory—faulting her for the absence of the record it had excluded. Appellate review must rest on "a record of sufficient completeness." *Griffin v. Illinois*, 351 U.S. 12, 18-20 (1956); *Evitts v. Lucey*, 469 U.S. 387, 393 (1985). No court can review an argument seven-ninths of which is not before it. *The conflict is not accidental. It is generated, in every State, by the same federal formula—and Oklahoma's own government has now conceded that nothing below will correct it.*

C. The Question Recurs Because the Incentive Structure Produces It, and Oklahoma's Own Institutions Have Confessed It Cannot Self-Correct

Due process forbids a tribunal any "possible temptation to the average man as a judge . . . not to hold the balance nice, clear, and true," *Tumey v. Ohio*, 273 U.S. 510, 532 (1927); reaches a tribunal financially entangled with the judgments it renders, *Ward v. Village of Monroeville*, 409 U.S. 57, 60 (1972); and asks objectively whether the arrangement poses "an unconstitutional potential for bias," not whether bias is shown, *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 881 (2009). Title IV-D is built the other way. Under 42 U.S.C. § 658a, each State is paid an incentive calculated on the support it collects; the sovereign that computes the arrearage, issues the levy, prosecutes the contempt, and imposes the sentence is paid more when it collects more. Incarceration is not incidental to that design; it is the enforcement mechanism of a revenue program. The program's federal administrator told the States in 2012 that civil contempt leading to incarceration should not be routine and that cases must be individually screened first. AT-12-01. Oklahoma jailed Petitioner twice on the same arrearage and liquidated her retirement account two days before the hearing it had scheduled to review the levy, after issuing its written decision sustaining it (App. D, QQ-1-QQ-3). A body that writes its decision before it hears is not adjudicating; it is collecting. *Marshall v. Jerico, Inc.* upheld an enforcement scheme because the officer with the financial stake was a prosecutor, not a judge, and the link between penalty and budget was remote. 446 U.S. 238, 249-51 (1980). Here the agency with the stake was the adjudicator and the link is statutory. *Jerico* marks the line; Oklahoma is on the far side of it.

Oklahoma's own institutions confirm it. The State Auditor's FY 2023 Federal Single Audit reported a record \$93.4 million in questioned costs, \$63.6 million of it OKDHS's failure to place guardrails on federal grant funds, and described a State

"mired in a culture of financial mismanagement." Okla. State Auditor & Inspector, Federal Single Audit Report, FY 2023 (Aug. 27, 2025) (App. CC). The Attorney General's Office of Civil Rights Enforcement recused itself from four complaints against "Tulsa County District and Judges" because the Office "also represents, defends, and counsels state agencies," and dismissed them on no merits ground but "Other: (Recusal - State Agency.)" App. BB, 334a-335a. The Legislature ordered an OSBI investigation; OSBI declined, and the committee was dissolved (App. I). The District Attorney, legislators, and a citizen grand-jury petition documented the same failures (App. J, K, L). Every oversight channel the State provides has been tried; every one is closed, three by the State's own hand. That is a Rule 10 argument, not a merits argument. Every State runs child-support enforcement under the same formula. The question is not what Oklahoma did to one mother but whether the Constitution limits a federally funded apparatus that seizes, adjudicates, and imprisons on its own account—and whether the answer must come from this Court, because no forum below is disinterested.

D. This Case Is an Ideal Vehicle

The questions are cleanly presented and the record is documentary. The contempt order sets a purge amount and contains no finding of ability to pay, App. B, 24a; the appellate court supplied that finding without citation, App. A, 8a. Every question was raised below or was barred from being raised by the very orders under review—a defect that is itself Question 6. Nor does the state court's reliance on Okla. Sup. Ct. R. 1.11(k)(1) bar review. A state procedural ground forecloses this Court's jurisdiction only if "adequate," *Coleman v. Thompson*, 501 U.S. 722, 729-30 (1991)—"firmly established and regularly followed," *James v. Kentucky*, 466 U.S. 341, 348-49

(1984); *Ford v. Georgia*, 498 U.S. 411, 423-24 (1991)—and not applied in an "exorbitant" manner, *Lee v. Kemna*, 534 U.S. 362, 376, 381 (2002). Three defects defeat adequacy: (1) the rule faults Petitioner for failing to cite the record, but the *State controlled the record and omitted seven of the nine pages of her closing argument*. Compare App. SS-1 with App. SS-2. A rule requiring a litigant to cite what the State omitted is one she could not satisfy—the "exorbitant" application *Lee* forbids, 534 U.S. at 376; (2) the pretrial order barred her from raising jurisdiction, the Oregon decree, and the child-welfare record, App. OO, and the court then held those defenses forfeited for want of developed argument, App. A, 9a-12a—a litigant cannot waive what the court forbade her to present; (3) on proposition two the court found waiver but held the claim "meritless" in the alternative, App. A, 7a n.6, and a court that reaches the merits has not clearly rested on the procedural ground, *Harris v. Reed*, 489 U.S. 255, 263 (1989). The only ruling adverse to Petitioner's indigency—a denial by a different docket—was raised as proposition five and left unreviewed, App. A, 9a (¶13); no court has ever adjudicated her able to pay. And propositions three and eleven were decided on the merits with no procedural bar at all. App. A, 8a (¶11); 12a-13a (¶¶17-19). Questions 2 and 4 are before this Court on those holdings, whatever the disposition of the rest.

Nor is there any finality or mootness obstacle. Questions 1, 2, and 4-10 arise from the February 2024 judgment, final upon the Oklahoma Supreme Court's denial of certiorari. Question 3 arises from the May 8, 2025 judgment, final because the State's cost bar (¶36) forecloses further state review, *Thompson v. City of Louisville*, 362 U.S. 199, 202 (1960) (reviewing police-court judgment directly where state law afforded no further review); *Largent v. Texas*, 318 U.S. 418, 421 (1943) (same)—and

alternatively, the second prosecution is part of the record of the first, final judgment, whose appeal was pending when it began. *Turner* held an identical claim "capable of repetition, yet evading review" because Turner had been jailed repeatedly and faced further proceedings, 564 U.S. at 439-41; Petitioner has been jailed twice, with a third contempt citation outstanding since August 21, 2025.

CONCLUSION / RELIEF SOUGHT

This petition asks the Court to reaffirm constitutional protections for indigent parents, foreign nationals, disabled and religious-minority litigants, and interstate judgments. "Woe unto them that decree unrighteous decrees" (Isaiah 10:1); "God is no respecter of persons" (Acts 10:34); "No man in this country is so high that he is above the law." *United States v. Lee*, 106 U.S. 196, 220 (1882). Grant petition, vacate judgment below, and remand with instructions that the courts below **(1) vacate** the contempt judgments of March 14, 2024 and May 8, 2025 as void; **(2) vacate** the levy of May 7, 2024 and order restitution with interest and tax/penalty make-whole; **(3)** accord full faith and credit to the Oregon judgment of January 8, 2016; **(4) In the alternative, GRANT, VACATE, AND REMAND** in light of *SEC v. Jarkesy*, 603 U.S. 109 (2024); **(5) Mandate** immediate restoration of parental rights and reunification with G.S.; **(6). Order** total expungement of vacated substantiations from Oklahoma's child-abuse registry, OKDHS, NCANDS, and interstate databases; issue written notice of reversal to all notified entities; and prohibit future reliance on these findings; and **(7) Refer** the documented fraud to the U.S. Attorney General outside Oklahoma/Texas and to the DOJ Civil Rights Division under 18 U.S.C. §§ 1512, 1519; **(8) Provide written** findings of fact and conclusions of law for appeal preservation rather than any abusive discretion for appeal purposes "if" justice, truth, the

Constitution of united states of America, and YAHUAH/CREATOR is not revered in this court; (9) Exercise this Court's supervisory authority over the lower courts to correct the record-integrity failures documented herein (Genesis 12:3; Psalm 109:17); (10) Grant all further relief as if this Court's own children stood in G.S.'s place—shielding a documented abuser by such cruelty to an innocent mother and firstborn female offspring is unconscionable—as it is written³ and as surely as YAHUAH lives: *Psalm 127:3; Psalm 105:15; Exodus 8:1 & 9:1; Isaiah 61:8; Deuteronomy 19:15; Isaiah 54:17; Galatians 6:7; Genesis 12:3 & Psalm 109:17, Psalm 35-37, John 8:36, Ezekiel 18:4*—may this Court render justice. HalleluYah in Yahusha's name.

Avouchment / Verification

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing Statement of Facts is true and correct to the best of my knowledge, information, and belief. Executed in Newberry County, South Carolina, on September 03, 2026.

WITHOUT RECOURSE

without prejudice

linh-tran:stephans/Ajfer

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³ “Behold, children are an inheritance from the LORD, and the fruit of the womb is His reward.” (*Psalm 127:3*); “Do not touch My anointed ones, and do no harm to My prophets.” (*Psalm 105:15*); “Go to Pharaoh and tell him, ‘This is what the LORD says: Let My people go, so that they may serve Me.’” (*Exodus 8:1*); “Go to Pharaoh and tell him, ‘This is what the LORD God of the Hebrews says: Let My people go, so that they may serve Me.’” (*Exodus 9:1*); “For I, the LORD, love justice and hate robbery offered as sacrifice. I will faithfully direct their work, and I will make an everlasting covenant with them.” (*Isaiah 61:8*); “One witness alone shall not be sufficient against anyone concerning any trespass, sin, or offense. A matter must be established by the testimony of two or three witnesses.” (*Deuteronomy 19:15*); “No weapon formed against you shall prosper, and you shall condemn every tongue that rises against you in judgment. This is the inheritance of the LORD’s servants, and their righteousness comes from Me, declares the LORD.” (*Isaiah 54:17*); “Do not be deceived: God cannot be mocked. Whatever a person sows, that person shall also reap.” (*Galatians 6:7*); “I will also bless those who bless you, and curse those who curse you; and in you shall all the families of the earth be blessed.” (*Genesis 12:3*); “Because he loved cursing, let the curse come upon him; and because he did not delight in blessing, let blessing remain far from him.” (*Psalm 109:17*); “Therefore, if the Son makes you free, you shall be free indeed.” (*John 8:36*); “Behold, all souls are mine [YAHUAH]; as the soul of the parent [mother/father], so also the soul of the child [daughter/son] is mine: the soul that sinneth, it shall die.” (*Ezekiel 18:4*).

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Common Law NOTARY as JURAT CERTIFICATE

Minnesota state) ss

Sherburne county)

On this 3rd day of September, 2026 before me, Melissa K. Vagle, a Notary Public, personally appeared remotely a living woman Linh Tran Stephens (*one-and-only Authorized Representative/Agent, attorney-in-fact, and secured party creditor* of LINH TRAN STEPHENS©™), who electronically (remotely) proved to me on the basis satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Minnesota State that the foregoing paragraph is true and correct. WITNESS my hand and official seal.

Melissa K. Vagle

