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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

THE UNITED STATES,

Defendant(s).

NO. 2:18-cv-01304-JCC

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962],
[18 U.S.C. § 242], [42 U.S.C. § 1983]

We the People of the United States bring this action against the defendant(s).

I. JURISDICTION

This court has original jurisdiction under the provisions of the United States Code Title 28 § 1331, Title 18 § 1962, Title 18 § 242, and Title 42 § 1983.

II. REQUEST

- The United States to uphold the United States Constitution - Articles and Amendments.
- The United States to amend their statutes to be in compliance with the United States Constitution - Articles and Amendments.
- The United States to arrest and prosecute any individual found to be involved in acts of Racketeering and Corruption.
- The United States to prosecute for perjury to the maximum allowed by law.

COMPLAINT
[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]
2:18-cv-01304-JCC

- 1 • The United States to audit their judiciary, bar associations, officials, and elections.
- 2 • The United States to reform their Family Courts.
- 3 • The United States to allow 50/50 legal shared custody of children.
- 4 • The United States not to interfere with the physical custody of children if there is no valid
- 5 limitation on their parents.
- 6 • The United States to defer decisions on physical custody of children to Alternative Dispute
- 7 Resolution in the absence of valid limitations.
- 8 • The United States not to issue or renew restraining or protection orders between parents and their
- 9 children in the absence of equal due process.
- 10 • The United States to immediately halt all child support enforcement.
- 11 • The United States to release all detainees who they imprisoned for failing to pay child support.
- 12 • The United States to abolish their debtors' prisons.
- 13 • The United States not to infringe upon Americans' rights and freedoms.

14 **III. PROCEDURAL HISTORY**

15 **The Case of Amar Safadi, et al.**

16 Mr. Safadi was a pro se litigant in a civil case of Dissolution of Marriage with Children in Snohomish
17 County in the State of Washington. He was the respondent / defendant in Case No. 17-3-02837-31
18 Snohomish County Superior Court - Everett, WA.

19 In 2017, Mr. Safadi's spouse - Aliya Tatari hired Ms. Helena Maria Koltonowska (aka Helenka
20 Koltonowska) as a pro bono legal aid family law attorney who was working for *Snohomish County*
21 *Legal Services* located in Everett, WA. Ms. Koltonowska is an attorney who is licensed to practice law
22 in the State of Washington under State Bar Number WSBA# 23172 since 1993.

23 On December 7th, 2017, Ms. Koltonowska filed an appearance on behalf of the petitioner / plaintiff
24 Aliya Tatari in the above mentioned case. From the onset of the case, Ms. Koltonowska baselessly
25 accused Mr. Safadi of harassment, child kidnapping, domestic violence and mental illness.

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]
2:18-cv-01304-JCC

1 On January 11th, 2018 the court reserved findings against Mr. Safadi for all of these accusations.
2 However, Ms. Koltonowska managed to convince the court to issue a one-sided restraining order
3 against Mr. Safadi that barred his access to his three minor children. Mr. Safadi has been unjustifiably
4 withheld from his children since December 18th, 2017. Ms. Koltonowska has aided the petitioner to
5 alienate the children from their father and effectively cut all ties between father and children even
6 though the father had proven to the court with evidence that he had been the parent in charge of the
7 children's education and activities and had historically had a great, loving and caring relationship with
8 his children. Since January 11th, 2018 Ms. Koltonowska was caught with numerous counts of
9 professional misconducts to include perjury, fraud, and misrepresentation. Mr. Safadi became very
10 suspicious of Ms. Koltonowska, her intentions and her true identity. Thus, Mr. Safadi obtained a
11 public record of Ms. Koltonowska's past cases. For several weeks, Mr. Safadi started investigating
12 Ms. Koltonowska's 66 cases of Dissolution of Marriage with Children. Mr. Safadi found a pattern of
13 fraud, lies and misrepresentation that essentially severed the parent-child bond using restraining and
14 protection orders presented by Ms. Koltonowska on behalf of her clients and signed by judges and
15 commissioners of Snohomish County Superior Court using allegations of domestic violence. Mr.
16 Safadi made contact with several of Ms. Koltonowska's victims. His instinct was confirmed that Ms.
17 Koltonowska had been aiding her clients to secure full custody of their children through false
18 allegations of domestic violence. Some of Ms. Koltonowska's victims were incarcerated due to false
19 allegations of domestic violence. These individuals never had any prior criminal records. All of the
20 parents Mr. Safadi met were traumatized from losing their children. Many of them, including Mr.
21 Safadi, are now facing homelessness and poverty due to lost jobs, legal expenses, and/or child support
22 withholdings that are beyond their financial abilities. Mr. Safadi continued his investigation. He found
23 that *Snohomish County Legal Services* is a legal aid law firm registered in the State of Washington as a
24 charitable organization that is 501(c)(3) tax exempt since 1983. As a legal aid, it was mandated that
25 free legal aid be offered only to poor citizens of Snohomish County who are also suffering from

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]

2:18-cv-01304-JCC

1 domestic violence. Ms. Koltonowska has offered free legal aid to Ms. Tatari who was neither poor at
2 the time nor ever faced domestic violence. It was found that Ms. Koltonowska's false allegation of
3 domestic violence was a requirement to obtain an Order to Waive Civil Fees and Surcharges
4 (QLSP Filing)(MTAF). It was also found that *Snohomish County Legal Services* had been appointing
5 to its board of directors several of Snohomish County Superior Court judges. This complaint is not
6 intended to be frivolous or to defame state judges; therefore, the identity of these judges will not be
7 disclosed out of respect. Upon examination of *Snohomish County Legal Services'* IRS Form 990, it
8 was found that the amount of grants received by this law firm jumped from \$255,492 in 2011 to
9 \$631,331 in 2015, a 147% increase over a four-year span! It was also found that *Snohomish County*
10 *Legal Services* had concealed the sources of \$539,081 in grant funding in 2015. It was found that Ms.
11 Koltonowska was amongst the highest paid employees of *Snohomish County Legal Services*. During
12 the investigation process, it was found that Ms. Koltonowska had been appointed as a Snohomish
13 County Deputy Prosecutor on May 20th, 1994 and had been using variations of names and signatures
14 over the years. When Mr. Safadi exposed the corruption and misconduct of Ms. Koltonowska, she
15 withdrew from all of her cases on March 6th, 2018 and immediately took an office in Snohomish
16 County Prosecuting Attorney's Office – Family Division. Snohomish County Prosecuting Attorney –
17 Mark Kirby Roe “reappointed” Ms. Koltonowska as a Deputy Prosecutor. Shortly after, the State of
18 Washington filed a Notice of State's Interest and Non-Appearance due to “administrative
19 considerations.” The State was essentially protecting State's officials from being subpoenaed to testify
20 in the upcoming divorce trial. Ms. Koltonowska's solid connection with Snohomish County
21 Government as a Deputy Prosecutor in Family Division and her work as a pro bono family law
22 attorney is a clear conflict of interest and a sign of an underlying corruption in Snohomish County that
23 has been going on for years. Ms. Koltonowska would offer one parent free legal aid, full custody of
24 the children, alimony and child support. Later, she would communicate with her government network,
25 namely the Department of Social and Health Services – Division of Child Support, to issue

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]

2:18-cv-01304-JCC

1 administrative orders of Income Withholdings (IWO). Finally, Ms. Koltonowska would enforce the
2 child support payments through the Snohomish County Prosecuting Attorney – Family Division.
3 These orders would be forwarded to law enforcement to arrest or harass the non-custodial parent for
4 failing to pay child support. The State of Washington represented by Snohomish County Prosecuting
5 Attorney’s mission is to collect child support from impoverished parents even if that would lead these
6 parents all the way down to homelessness. The State is abusing Title IV-D of the Social Security Act,
7 specifically the federal incentive to the State for enforcing Child Support. The more child support the
8 State collects, the more federal funding it receives. The scheme used by the Snohomish County
9 Prosecuting Attorney and his undercover Deputy Prosecutor was to serve the non-custodial parent a
10 no-contact restraining order to limit his or her access to their children using false allegations in clear
11 violation of the Due Process clause of the 14th Amendment of the US Constitution. Bar-to-Access is
12 their strategy to maximize Child Support payment and therefore the federal funding that the State
13 receives pursuant to 42 U.S.C. § 658a. Many parents in Snohomish County are victims of the State.
14 This corruption has created many single-parent homes in Snohomish County, which indirectly
15 escalated crime, poverty, and homelessness rates over the years. In early 2018, multiple grievances
16 with the Washington State Bar Association (WSBA) were filed against Attorney Helena Maria
17 Koltonowska and her accomplices. These grievances cited violations to the Rules of Professional
18 Conduct (RPC) related to factual events and pleadings. The WSBA dismissed Mr. Safadi’s grievance
19 against Ms. Koltonowska. The Committee Chair who signed the dismissal order was Attorney Hillary
20 E. Graber. It was found that Ms. Graber is a Snohomish County Deputy Prosecutor who was appointed
21 by Mr. Roe on March 22nd, 2015. Mr. Safadi filed a grievance against Ms. Graber for clearly being a
22 member of the corruption by trying to cover-up for her boss and coworker. On May 9th, 2018 an
23 officer of the Washington State Supreme Court dismissed the grievance against Ms. Graber.
24 Eventually the WSBA dismissed all of Mr. Safadi’s grievances and did not discipline or prosecute any
25 attorney. Mr. Safadi’s concern of corruption was brought to a local news reporter. This seasoned

*COMPLAINT**[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]**2:18-cv-01304-JCC*

1 reporter testified that Snohomish County Prosecuting Attorney - Mark Kirby Roe is a well-known
2 corrupt official. Shockingly, that reporter was later offered a job at the local government, likely in
3 exchange for his silence. The identity of this reporter will not be disclosed out of respect to his long
4 years of service to his community. Mr. Safadi's focus shifted to Snohomish County Prosecuting
5 Attorney – Mark Kirby Roe. It was found that Mr. Roe has been serving in Snohomish County
6 Government since May 28th, 1987. He was appointed as a Snohomish County Deputy Prosecutor. On
7 December 9th, 2009 Mr. Roe took an Oath to be Snohomish County Prosecuting Attorney for the
8 “unexpired term” of the elected office. The oath was sworn before a Snohomish County Superior
9 Court Judge by the name of “Elly Tai.” No judge with that name was found to have served in
10 Snohomish County Superior Court during that period. Mr. Roe is holding the office of County
11 Prosecuting Attorney, an elected position. However, looking at Mr. Roe's records for the 2010
12 election, it was found that these records show election registrations signed after the election was over
13 or two years prior to the election. As for the 2014 election, no record of Candidate Registration was
14 found; however, an Oath of Office was found where Mr. Roe swore an oath before himself! It appears
15 that Mr. Roe had committed fraud to hold an elected office for two consecutive terms from 2010 to
16 2018. It is disappointing to note that the State of Washington is still trying to protect Mr. Roe and his
17 accomplices. On September 4th, 2018 the complaint against Mr. Roe et. al (2:18-cv-01305-RAJ) was
18 served upon the Attorney General of the State of Washington. Assistant Attorney General Paul M.
19 Crisalli appeared on behalf of the defendants. Mr. Crisalli later withdrew his appearance stating that
20 “it appears that none of the defendants are state officers or employees that the Attorney General is
21 authorized to represent.” Mr. Crisalli cited Washington State Statute RCW 43.10.030. Examining
22 RCW 43.10.030, it appears that Mr. Crisalli might have committed perjury under 18 U.S.C. § 1621.
23 Mr. Safadi has communicated with many individuals from different counties within the State of
24 Washington who were also victims of the State's abuse of their civil rights. Later, Mr. Safadi
25 communicated with many Americans from different States to find abuse of civil rights across the

COMPLAINT

*[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]
2:18-cv-01304-JCC*

1 nation that spanned several years. This abuse was colorblind. The victims came from different races,
2 faiths, creeds, genders, and backgrounds. Many victims are veterans who honorably served in the
3 United States military. Others are members of the law enforcement. Others have succumbed to
4 depression and anxiety and decided to take their own lives. This is a great injustice in our nation that
5 promises “Justice and Liberty for All.” The surviving witnesses are ready to testify against the States
6 in a trial by jury if the occasion arises. Looking at the ever-rising homeless population in the States, it
7 seems that the federal funding received by the States is abused and not spent on the people who need it
8 the most. On a limited budget, Mr. Safadi was unable to hire a lawyer or seek legal aid. Thus, he had
9 to represent himself pro se by studying court rules, procedural law, and case law to defend himself. It
10 is found that the States’ statutes and sections of the Social Security Act are unconstitutional. Mr.
11 Safadi is fighting to uphold his oath to defend the United States of America and its Constitution
12 pursuant to 10 U.S.C. § 502a. Mr. Safadi is well aware that the damage done to him, his children,
13 other victims and their families is not reversible. No financial relief can bring back lost children or
14 cure the emotional suffering that the States knowingly inflicted for many years. Mr. Safadi is
15 demanding justice for himself and other Americans. In an effort by the State of Washington to silence
16 the truth and after the Racketeering and the Corruption were exposed and found in the *Tatari v. Safadi*
17 case (Snohomish County Superior Court – Docket # 17-3-02837-31), the State decided to retaliate
18 against Mr. Safadi. The court issued a Child Support Order with made-up past due child support
19 alleging that Mr. Safadi was voluntarily under-employed. The court also issued an outrageous
20 Parenting Plan that is full of lies and false accusations completely stripping Mr. Safadi of his parental
21 rights and his legal custody of his children. But that’s not where the story ends. The State issued a
22 Restraining Order against Mr. Safadi until his minor children reach the age of 18. Although Mr. Safadi
23 refused to sign any order that was presented by the corrupt lawyers of *Snohomish County Legal*
24 *Services*, the State later issued an Administrative Order of Income Withholding (IWO) without the
25 presence or knowledge of Mr. Safadi. Mr. Safadi never asked to be classified as a “non-custodial”

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]

2:18-cv-01304-JCC

1 parent. He had never failed in his obligation to support and nourish his children. The State thinks it
2 knows "the best interest of the children." The State made the children fatherless. The children's school
3 grades suffered. They stopped going to their activities. They moved out of an upscale house to low-
4 income housing. Besides, the State made the father homeless not even having enough money to
5 support a decent living. Is this the best interest of the children? It appears that this is the best interest
6 of the State and its corrupt attorneys. Parental rights are human rights that are given by GOD the
7 Creator. The United States have enacted laws that are in violation of the United States Constitution -
8 Articles, and Amendments. Moreover, the United States have been incarcerating parents who were
9 unable to pay child support even though debtors' prison was outlawed in 1833. No State can deprive
10 any person of life, liberty or property without due process of law nor deny any person the equal
11 protection of the laws. Deprivation of Rights Under Color of Law [18 U.S.C. § 242] makes it a crime
12 for any person acting under color of law, statute, ordinance, regulation, or custom to willfully deprive
13 or cause to be deprived from any person those rights, privileges, or immunities secured or protected by
14 the Constitution and laws of the United States. Acts under "color of any law" include acts not only
15 done by federal, state, or local officials within the bounds or limits of their lawful authority, but also
16 acts done without and beyond the bounds of their lawful authority; provided that, in order for unlawful
17 acts of any official to be done under "color of any law," the unlawful acts must be done while such
18 official is purporting or pretending to act in the performance of his/her official duties. This definition
19 includes any person who is bound by laws, statutes ordinances, or customs. Punishment varies from a
20 fine or imprisonment of up to one year, or both, and if bodily injury results or if such acts include the
21 use, attempted use, or threatened use of a dangerous weapon, explosives, or fire shall be fined or
22 imprisoned up to ten years or both, and if death results, or if such acts include kidnapping or an
23 attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an
24 attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or
25 may be sentenced to death.

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]
2:18-cv-01304-JCC

V. LEGAL ARGUMENT

A. CUSTODY OF CHILDREN

The laws as written violate the legal custody of children. Both mothers and fathers have equal rights to the *legal* custody of their children under the equal protection clause of the Fourteenth Amendment.

Legal custody and physical custody are two distinct terms. When one parent is the *physical* custodian of a child, the other parent should not be deprived of his or her *legal* custody of that child. The rights of parents to the care, custody and nurture of their children is of such character that it cannot be denied without violating those fundamental principles of liberty and justice which lie at the base of all our civil and political institutions, and such right is a fundamental right protected by this amendment (First) and Amendments 5, 9, and 14.

- The 9th Circuit recognized that “a parent has a constitutionally protected liberty interest in the companionship and society of his or her child.”
Ward v. City of San Jose, 967 F. 2d 280; US Ct App 9th Cir, (1992)
- The 9th Circuit held that 'the integrity of the family unit has found protection in the Due Process Clause of the Fourteenth Amendment, the Equal Protection Clause of the Fourteenth Amendment, and the Ninth Amendment'. *Kelson v. Springfield*, 767 F 2d 651; US Ct App 9th Cir, (1985)
- The 10th Circuit has expressly recognized that “the forced separation of parent from child, even for a short time (in this case 18 hours); represent a serious infringement upon the rights of both.”
J.B. v. Washington County, 127 F.3d 919, 923; US Ct App 10th Cir, (1997)
- The 7th Circuit concluded “the Due Process Clause of the Fourteenth Amendment requires that severance in the parent-child relationship caused by the state occur only with rigorous protections for individual liberty interests at stake.”
Bell v. City of Milwaukee, 746 F 2d 1205; US Ct App 7th Cir WI, (1984)
- The rights of parents to the care, custody and nurture of their children is of such character that it cannot be denied without violating those fundamental principles of liberty and justice which lie at

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]
2:18-cv-01304-JCC

1 the base of all our civil and political institutions, and such right is a fundamental right protected by
2 this amendment (First) and Amendments 5, 9, and 14.

3 *Doe v. Irwin*, 441 F Supp 1247; U.S. D.C. of Michigan, (1985)

- 4 • The several states have no greater power to restrain individual freedoms protected by the First
5 Amendment than does the Congress of the United States.

6 *Wallace v. Jaffree*, 105 S Ct 2479; 472 US 38, (1985)

- 7 • Loss of First Amendment Freedoms, for even minimal periods of time, unquestionably constitutes
8 irreparable injury. Though First Amendment rights are not absolute, they may be curtailed only by
9 interests of vital importance, the burden of proving which rests on their government.

10 *Elrod v. Burns*, 96 S Ct 2673; 427 US 347, (1976)

- 11 • Law and court procedures that are “fair on their faces” but administered “with an evil eye or a
12 heavy hand” are discriminatory and violate the equal protection clause of the Fourteenth
13 Amendment. *Yick Wo v. Hopkins*, 118 US 356, (1886)

- 14 • Even when blood relationships are strained, parents retain vital interest in preventing irretrievable
15 destruction of their family life; if anything, persons faced with forced dissolution of their parental
16 rights have more critical need for procedural protections than do those resisting state intervention
17 into ongoing family affairs. *Santosky v. Kramer*, 102 S Ct 1388; 455 US 745, (1982)

- 18 • Parents have a fundamental constitutionally protected interest in continuity of legal bond with their
19 children. *Matter of Delaney*, 617 P 2d 886, Oklahoma (1980)

- 20 • The liberty interest of the family encompasses an interest in retaining custody of one’s children
21 and, thus, a state may not interfere with a parent’s custodial rights absent due process protections.

22 *Langton v. Maloney*, 527 F Supp 538, D.C. Conn. (1981)

- 23 • Parent’s right to custody of child is a right encompassed within protection of this amendment
24 which may not be interfered with under guise of protecting public interest by legislative action
25 which is arbitrary or without reasonable relation to some purpose within competency of state to

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]

2:18-cv-01304-JCC

1 effect. *Regenold v. Baby Fold, Inc.*, 369 NE 2d 858; 68 Ill 2d 419, appeal dismissed 98 S Ct 1598,
 2 435 US 963, IL, (1977)

- 3 • Parent’s interest in custody of her children is a liberty interest which has received considerable
 4 constitutional protection; a parent who is deprived of custody of his or her child, even though
 5 temporarily, suffers thereby grievous loss and such loss deserves extensive due process protection.
 6 *In the Interest of Cooper*, 621 P 2d 437; 5 Kansas App Div 2d 584, (1980)
- 7 • Father enjoys the right to associate with his children which is guaranteed by this amendment
 8 (First) as incorporated in Amendment 14, or which is embodied in the concept of “liberty” as that
 9 word is used in the Due Process Clause of the 14th Amendment and Equal Protection Clause of the
 10 14th Amendment. *Mabra v. Schmidt*, 356 F Supp 620; DC, WI (1973)
- 11 • Separated as our issue is from that of the future interests of the children, we have before us the
 12 elemental question whether a court of a state, where a mother is neither domiciled, resident nor
 13 present, may cut off her immediate right to the care, custody, management and companionship of
 14 her minor children without having jurisdiction over her in personam. Rights far more precious to
 15 appellant than property rights will be cut off if she is to be bound by the Wisconsin award of
 16 custody. *May v. Anderson*, 345 US 528, 533; 73 S Ct 840, 843, (1952)
- 17 • A parent’s right to care and companionship of his or her children are so fundamental, as to be
 18 guaranteed protection under the First, Ninth, and Fourteenth Amendments of the United States
 19 Constitution. *In re: J.S. and C.*, 324 A 2d 90; *supra* 129 NJ Super, at 489 (1974)
- 20 • The Court stressed, “the parent-child relationship is an important interest that undeniably warrants
 21 deference and, absent a powerful countervailing interest, protection.” A parent’s interest in the
 22 companionship, care, custody and management of his or her children rises to a constitutionally
 23 secured right, given the centrality of family life as the focus for personal meaning and
 24 responsibility. *Stanley v. Illinois*, 405 US 645, 651; 92 S Ct 1208, (1972)
- 25 • Parent’s rights have been recognized as being “essential to the orderly pursuit of happiness by free

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]
 2:18-cv-01304-JCC

1 man.” *Meyer v. Nebraska*, 262 US 390; 43 S Ct 625, (1923)

- 2 • The U.S. Supreme Court implied that “a (once) married father who is separated or divorced from a
3 mother and is no longer living with his child” could not constitutionally be treated differently from
4 a currently married father living with his child.

5 *Quilloin v. Walcott*, 98 S Ct 549; 434 US 246, 255^Q56, (1978)

- 6 • No bond is more precious and none should be more zealously protected by the law as the bond
7 between parent and child. *Carson v. Elrod*, 411 F Supp 645, 649; DC E.D. VA (1976)
- 8 • A parent’s right to the preservation of his relationship with his child derives from the fact that the
9 parent’s achievement of a rich and rewarding life is likely to depend significantly on his ability to
10 participate in the rearing of his children. A child’s corresponding right to protection from
11 interference in the relationship derives from the psychic importance to him of being raised by a
12 loving, responsible, reliable adult. *Franz v. U.S.*, 707 F 2d 582, 595^Q599; US Ct App (1983)
- 13 • A parent’s right to the custody of his or her children is an element of “liberty” guaranteed by the
14 5th Amendment and the 14th Amendment of the United States Constitution.

15 *Matter of Gentry*, 369 NW 2d 889, MI App Div (1983)

- 16 • Reality of private biases and possible injury they might inflict were impermissible considerations
17 under the Equal Protection Clause of the 14th Amendment.

18 *Palmore v. Sidoti*, 104 S Ct 1879; 466 US 429

- 19 • Legislative classifications which distributes benefits and burdens on the basis of gender carry the
20 inherent risk of reinforcing stereotypes about the proper place of women and their need for special
21 protection; thus, even statutes purportedly designed to compensate for and ameliorate the effects of
22 past discrimination against women must be carefully tailored. The state cannot be permitted to
23 classify on the basis of sex. *Orr v. Orr*, 99 S Ct 1102; 440 US 268, (1979)

- 24 • The United States Supreme Court held that the “old notion” that “generally it is the man’s primary
25 responsibility to provide a home and its essentials” can no longer justify a statute that

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]

2:18-cv-01304-JCC

1 discriminates on the basis of gender. No longer is the female destined solely for the home and the
2 rearing of the family, and only the male for the marketplace and the world of ideas.

3 *Stanton v. Stanton*, 421 US 7, 10; 95 S Ct 1373, 1376, (1975)

- 4 • Judges must maintain a high standard of judicial performance with particular emphasis upon
5 conducting litigation with scrupulous fairness and impartiality.

6 *28 USCA § 2411; Pfizer v. Lord*, 456 F.2d 532; cert denied 92 S Ct 2411; *US Ct App MN*, (1972)

- 7 • State Judges, as well as federal, have the responsibility to respect and protect persons from
8 violations of federal constitutional rights. *Gross v. State of Illinois*, 312 F 2d 257, (1963)
- 9 • The Constitution also protects “the individual interest in avoiding disclosure of personal matters.”
10 Federal Courts (and State Courts), under *Griswold* can protect, under the “life, liberty and pursuit
11 of happiness” phrase of the Declaration of Independence, the right of a man to enjoy the mutual
12 care, company, love and affection of his children, and this cannot be taken away from him without
13 due process of law. There is a family right to privacy, which the state cannot invade or it becomes
14 actionable for civil rights damages. *Griswold v. Connecticut*, 381 US 479, (1965)
- 15 • The right of a parent not to be deprived of parental rights without a showing of fitness,
16 abandonment or substantial neglect is so fundamental and basic as to rank among the rights
17 contained in this Amendment (Ninth) and Utah’s Constitution, Article 1 § 1.

18 *In re U.P.*, 648 P 2d 1364; *Utah*, (1982)

- 19 • The rights of parents to parent-child relationships are recognized and upheld.

20 *Fantony v. Fantony*, 122 A 2d 593, (1956); *Brennan v. Brennan*, 454 A 2d 901, (1982)

- 21 • State’s power to legislate, adjudicate and administer all aspects of family law, including
22 determinations of custodial; and visitation rights, is subject to scrutiny by federal judiciary within
23 reach of due process and/or equal protection clauses of 14th Amendment...Fourteenth Amendment
24 applied to states through specific rights contained in the first eight amendments of the Constitution
25 which declares fundamental personal rights...Fourteenth Amendment encompasses and applied to

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]

2:18-cv-01304-JCC

1 states those preexisting fundamental rights recognized by the Ninth Amendment. The Ninth
2 Amendment acknowledged the prior existence of fundamental rights with it: “The enumeration in
3 the Constitution, of certain rights, shall not be construed to deny or disparage others retained by
4 the people.” The United States Supreme Court, in a long line of decisions, has recognized that
5 matters involving marriage, procreation, and the parent-child relationship are among those
6 fundamental “liberty” interests protected by the Constitution. Thus, the decision in *Roe v. Wade*,
7 *410 US 113; 93 S Ct 705; 35 L Ed 2d 147, (1973)*, was recently described by the Supreme Court as
8 found on the “Constitutional underpinning of ... a recognition that the “liberty” protected by the
9 Due Process Clause of the 14th Amendment includes not only the freedoms explicitly mentioned
10 in the Bill of Rights, but also a freedom of personal choice in certain matters of marriage and
11 family life.” The non-custodial divorced parent has no way to implement the constitutionally
12 protected right to maintain a parental relationship with his child except through visitation. To
13 acknowledge the protected status of the relationship as the majority does, and yet deny protection
14 under Title 42 U.S.C. § 1983, to visitation, which is the exclusive means of effecting that right, is
15 to negate the right completely. *Wise v. Bravo, 666 F.2d 1328, (1981)*

- 16 • In controversies affecting the custody of an infant, the interest and welfare of the child is the
17 primary and controlling question by which the court must be guided. This rule is based upon the
18 theory that the state must perpetuate itself, and good citizenship is essential to that end. Though
19 nature gives to parents the right to the custody of their own children, and such right is scarcely less
20 sacred than the right to life and liberty, and is manifested in all animal life, yet among mankind the
21 necessity for government has forced the recognition of the rule that the perpetuity of the state is the
22 first consideration, and parental authority itself is subordinate to this supreme power. It is
23 recognized that: “The moment a child is born it owes allegiance to the government of the country
24 of its birth, and is entitled to the protection of that government. And such government is obligated
25 by its duty of protection, to consult the welfare, comfort and interest of such child in regulating its

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]

2:18-cv-01304-JCC

1 custody during the period of its minority.’ *Mercein v. People*, 25 Wend. (N. Y.) 64, 103, 35 Am.
 2 Dec. 653; *McKercher v. Green*, 13 Colo. App. 271, 58 Pac. 406

- 3 • But as government should never interfere with the natural rights of man, except only when it is
 4 essential for the good of society, the state recognizes, and enforces, the right which nature gives to
 5 parents [48 Colo. 466] to the custody of their own children, and only supervenes with its sovereign
 6 power when the necessities of the case require it. The experience of man has demonstrated that the
 7 best development of a young life is within the sacred precincts of a home, the members of which
 8 are bound together by ties entwined through ‘bone of their bone and flesh of their flesh’; that it is
 9 in such homes and under such influences that the sweetest, purest, noblest, and most attractive
 10 qualities of human nature, so essential to good citizenship, are best nurtured and grow to
 11 wholesome fruition; that, when a state is based and built upon such homes, it is strong in
 12 patriotism, courage, and all the elements of the best civilization. Accordingly these recurring facts
 13 in the experience of man resulted in a presumption establishing *prima facie* that parents are in
 14 every way qualified to have the care, custody, and control of their own offspring, and that their
 15 welfare and interests are best subserved under such control. Thus, by natural law, by common law,
 16 and, likewise, the statutes of this state, the natural parents are entitled to the custody of their minor
 17 children, except when they are unsuitable persons to be entrusted with their care, control, and
 18 education, or when some exceptional circumstances appear which render such custody inimicable
 19 to the best interests of the child. While the right of a parent to the custody of its infant child is
 20 therefore, in a sense, contingent, the right can never be lost or taken away so long as the parent
 21 properly nurtures, maintains, and cares for the child.

22 *Wilson v. Mitchell*, 111 P. 21, 25-26, 48 Colo. 454 (Colo. 1910)

23 **B. CHILD SUPPORT**

24 The current laws regarding child support are in direct violation of the United States Constitution
 25 (Article I, Sections 9 and 10) that prohibits bills of attainder or *ex post facto laws*. The laws currently

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]

2:18-cv-01304-JCC

1 classify divorcing parents as custodian (oblige) and non-custodian (obligor), deny the non-custodial
 2 parent equal due process by trial, then “punish” the non-custodial parent with child support.
 3 Punishment has the forms of wage withholding, liens on property; offset of unemployment
 4 compensation payments; seizure and sale of personal or real property; reporting arrearages to credit
 5 agencies to prevent the undeserved extension of credit; seizure of State and Federal income tax
 6 refunds; revocation of various types of licenses (driver’s, business, occupational, recreational),
 7 attachment of lottery winnings and insurance settlements of debtors parents; requirement that
 8 recipients of financial assistance from the Small Business Administration, including direct loans and
 9 loan guarantees, must certify that the recipient is not more than 60 days delinquent in the payment of
 10 child support, authority to seize assets held by public or private retirement funds and financial
 11 institutions; deprivation of a debtor to a fresh start to discharge a debt completely, pay a percentage of
 12 the debt, or pay the full amount of the debt over a longer period of time because debts for child
 13 support and alimony are not dischargeable, and State or Federal imprisonment, fines or both.

- 14 • The Supreme Court has explained that a bill of attainder is a law that legislatively determines guilt
 15 and inflicts punishment upon an identifiable individual or group of individuals without provision
 16 of the protections of a judicial trial. *United States v. Brown*, 381 U.S. 437, 448-50 (1965)
- 17 • There are 3 requirements for a bill of attainder (1) specification of the affected person or persons;
 18 (2) punishment; and (3) lack of conviction by trial. The Bill of Attainder Clause is to be liberally
 19 construed in the light of its purpose to prevent legislative punishment of designated persons or
 20 groups. *United States v. Brown*, 381 U.S. 437 (1965)
- 21 • “The Due Process Clause” is a restraint on the legislative as well as on the executive and judicial
 22 powers of the government, and cannot be so construed as to leave congress free to make any
 23 process “due process of law,” by its mere will.

24 *Rafedie v. INS*, 880 F. 2d 506; *US Ct App DC Cir*, (1989)

25 ///

COMPLAINT

[28 U.S.C. § 1331], [18 U.S.C. § 1962], [18 U.S.C. § 242], [42 U.S.C. § 1983]
 2:18-cv-01304-JCC

1 **C. DEBTORS' PRISON**

2 In the United States, debtors' prisons were banned under federal law in 1833. Though *de jure* debtors'
3 prisons are a thing of the past, *de facto* debtors' imprisonment is not. Individual States still incarcerate
4 Americans for failing to pay their child support or other debts regardless of their financial or physical
5 abilities to repay these debts. Incarcerating indigent debtors is unconstitutional under the Fourteenth
6 Amendment's Equal Protection clause. During the 20th century, on three separate occasions, the
7 Supreme Court affirmed the unconstitutionality of incarcerating those too poor to repay debt.

- 8 • The Supreme Court decided that a maximum prison term could not be extended because the
9 defendant failed to pay court costs or fines. *Williams v. Illinois, 399 U.S. 235 (1970)*
- 10 • The Supreme Court ruled that a defendant may not be jailed solely because he or she is too
11 indigent to pay a fine. *Tate v. Short, 401 U.S. 395 (1971)*
- 12 • The Supreme Court compelled local judges to distinguish between debtors who are too poor to pay
13 and those who have the financial ability but "willfully" refuse to do so.
14 *Bearden v. Georgia, 461 U.S. 660 (1983)*

15 **VI. CONCLUSION AND RELIEF**

16 This Court shall retain jurisdiction over this case to enforce this order. The Supremacy Clause for the
17 Constitution of the United States shall nullify any attempt to circumvent, abrogate or violate the
18 Constitutionally Protected Rights of the American People. The attached Stipulated Final Judgment of
19 Permanent Injunction and Relief shall be appropriate in this case.

20 Dated: December 21st, 2018

21 Presented By: JOHN DOE, et al.

22 /s/ John Doe

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Signature

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

THE UNITED STATES OF AMERICA,

Plaintiff,

NO. 2:18-cv-01304-JCC

v.

THE UNITED STATES,

Defendant(s)

STIPULATED FINAL JUDGMENT OF
PERMANENT INJUNCTION AND RELIEF

-
- TO: CLERK OF COURT
 - TO: THE PRESIDENT OF THE UNITED STATES OF AMERICA
 - TO: THE UNITED STATES CONGRESS
 - TO: THE UNITED STATES SUPREME COURT
 - TO: THE UNITED STATES DEPARTMENT OF JUSTICE
 - TO: THE ATTORNEY GENERALS OF THE UNITED STATES

This matter having come on regularly before the undersigned Judge on the Plaintiff's Complaint. And the Court having considered the records and files herein and being fully advised noting that any non-compliance with this order will be ample grounds for any individual who is guilty of Obstruction of Justice, Dereliction of Duty, Malfeasance, Misfeasance or Nonfeasance to be Indicted and Prosecuted;

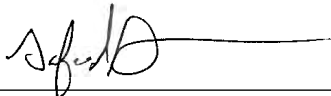
*STIPULATED FINAL JUDGMENT OF
PERMANENT INJUNCTION AND RELIEF
2:18-cv-01304-JCC*

1 It is so **ORDERED, ADJUDGED, and DECREED** that:

- 2 • The United States shall uphold the United States Constitution - Articles and Amendments.
- 3 • The United States shall repeal Title IV-D [42 U.S.C. §§ 651 to 669b] and
- 4 Title IV-E [42 U.S.C. §§ 670 to 679c] of the Social Security Act.
- 5 • The United States shall arrest and prosecute any individual who after 01/01/2019 commits an act
- 6 of Racketeering and Corruption against the States and its people.
- 7 • The United States shall prosecute any individual who after 01/01/2019 commits perjury.
- 8 • The United States shall audit their judiciary, bar associations, officials, and elections.
- 9 • The United States shall reform their Family Courts.
- 10 • The United States shall allow 50/50 legal shared custody of children.
- 11 • The United States shall not interfere with the physical custody of children if there is no valid
- 12 limitation on their parents.
- 13 • The United States shall defer decisions on physical custody of children to Alternative Dispute
- 14 Resolution in the absence of valid limitations.
- 15 • The United States shall not issue or renew restraining or protection orders between parents and
- 16 their children in the absence of equal due process.
- 17 • The United States shall immediately halt all child support enforcement.
- 18 • The United States shall release all detainees who they imprisoned for failing to pay child support.
- 19 • The United States shall abolish their debtors' prisons.
- 20 • The United States shall not infringe upon Americans' rights and freedoms.

21 Dated this 21st day of December 2018.

22 Presented By: JOHN DOE, et al.

23 

24 Signature

UNITED STATES DISTRICT JUDGE

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

THE UNITED STATES OF AMERICA,

Plaintiff,

NO. 2:18-cv-01304-JCC

v.

THE UNITED STATES,

Defendant(s).

CERTIFICATE OF SERVICE

I hereby certify that the forgoing *Complaint* and *Stipulated Final Judgment of Permanent Injunction and Relief* dated December 21st, 2018 were electronically filed with the United States District Court, Western District of Washington – Seattle Division. I certify that service will be accomplished upon:

The Honorable John C. Coughenour

United States Courthouse

700 Stewart Street, Suite 16229

Seattle, WA 98101-9906

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9 -----

10 Dated: December 21st, 2018

11 JANE DOE

12 _____

13 */s/ Jane Doe*

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