

Circuit Court of Maryland for Baltimore City
DJJ Center
300 North Gay Street, Division of Juvenile Causes
Baltimore, Maryland 21202

IN THE CIRCUIT COURT OF MARYLAND
FOR BALTIMORE CITY

RE:

Baltimore City Department of Social Services

VS

Crystal Dixon

Joshua Sweeney-Bey
Petition Number: 898170004
DOB: 6/19/1991
ID Number: 0160897

**3/17/2004 CONTESTING HEARING
JUDGE KAPLAN**

Crystal Dixon, mother of child, is requesting the following:

- 1) I want the case appealed.
- 2) I am against MENTOR, Dr. Donna Dryer, and I want to have Joshua summoned to court permanently for all hearings so the judge can eliminate false testimony by BCDSS.
- 3) I want Joshua to have Christian pastoral counseling by a male pastor or male Christian mentor from a church eliminating MENTOR program
- 4) I want Joshua off all psychological medications because the medications are the cause of his behavior and I want the Citizens Commission Rights for Children involved with fighting against the use of psyche drugs on my son.
- 5) I want Joshua's school records, medical records, and CPS file from 1998 to present.
- 6) I want weekly phone calls with Joshua or daily supervised phone calls with Joshua. I want Joshua to be able to send me photos of him on a monthly basis.
- 7) I want it court ordered that visits with Joshua all be video taped and audio taped on a weekly basis. I want for the foster care parents and BCDSS to provide video taped evidence of Joshua's behavior and biting anyone. I want all hearsay evidence eliminated.

- 8) I want Joshua to send me artwork from school and write me on a weekly basis as a healing process for Joshua.
- 9) I want Eileen Franch and the Legal Aid Inc. eliminated as Joshua's attorney and I request to have a Christian pro bono attorney or Pastor to represent Joshua along with a lawyer specializing in constitutional law, civil rights, and disability law. Joshua needs a lawyer that is not biased with BCDSS and will work with both Joshua and his mother, Crystal Dixon. Joshua needs a lawyer to be present at all counseling sessions, visits, and hearings to eliminate governmental abuse and false testimony. Eileen Franch never once in 5 years was demanded or court ordered to attend visits taped to protect Joshua's rights or my daughter's rights for accountability.
- 10) I want to be present when Joshua is hospitalized and contacted immediately when he is hospitalized. I want to know what hospital he is in every time and I want my family and friends to be able to visit Joshua with me as a support. I want supervised court ordered hospital visits for court record with Joshua's attorney and pastor present at the hospital.
- 11) I want all birthdays and holidays visits made up with additional visits. I want the visits to be taped at a church or decent place of bonding other than BCDSS.
- 12) I want Joshua in a home school program like the Calvert School or Home school International since he is having problems in foster care and in public school. I am willing to home school him myself and pay for his education. I have not been told what grade Joshua is in now and if he has failed a grade or not. I am not given Joshua's report cards. I want to have Joshua's report cards, IEP records, and entire education record. I want to visit Joshua at his school supervised and attend Parent-Teacher meetings. I want the BCDSS limited guardianship eliminated off the permanency plan and appealed. Joshua need to be in a permanent hospital setting or permanent boys institution for his age until he is 18 years old since the foster care system and BCDSS failed. Foster care should be eliminated off the case and there should not be any BCDSS contracted "foster care parents". I want full custody of my son. Joshua must be in a group home or boy institution and have BCDSS eliminated from the entire case. "Foster parents" are not Joshua's real parents and should not have more rights than Joshua's birth mother. Since Joshua has mental health special needs he must be in a hospital setting permanently at all times to eliminate more foster care BCDSS abuse. The boys home or hospital institution should be flexible in allowing bonding since Joshua is not criminal. Every time BCDSS and the foster parents call the police on Joshua it is a sign that BCDSS and the foster parents are neglectful and unable to care for Joshua just as much as I was falsely accused by BCDSS in 1998. If Joshua is permanently placed in a hospital or boys home there can not be false BCDSS reports and false foster parent testimony especially since everything is never video taped for court documentation.
- 13) I want to provide checks for Joshua as financial support. I gave BCDSS 2 checks that were rejected and not given to Joshua. I should be allowed to pay for Joshua's clothing and school supplies. I want to know my son's weight and size so I can buy him clothing. I should be allowed to have supervised shopping visits with my son to bond with him. Joshua has been mistreated and disrespected by

BCDSS so long that he will always be angry. BCDSS, the boys home, or hospital I am requesting for Joshua to be permanently placed in until custody is returned in my care, should have supervised outings or visits taped for the court at restaurants, malls, church, and other nice places and see how Joshua reacts. In the past when Joshua was in my custody his doctors gave Joshua and me Christmas gifts and they under supervision took my family to Disney on Ice. I am willing to pay for the outings myself. I have a home business and a book that I published in which will be a financial support for myself, my family, and Joshua. I want Joshua when turns legal age to work to be able to work for my business and get money out of my business for himself. My business is advertised under AOL classifies. My business website is www.nestfamily.com/crystaldixon, www.1stBooks.com/bookview/18872, and www.my.tupperware.com/CSweeney. I have saved up money for Joshua and my family already. I want all cards, gifts, and money reviewed by the judge and directly given to Joshua by the judge when Joshua is summoned to court.

- 14) I want the foster parents to be eliminated off the case and limited guardianship eliminated from BCDSS care however if the court insist on having “foster parents” for Joshua they should be court ordered for accountability eliminating governmental abuse and false testimony to be present at all visits and provide their phone number for weekly supervised phone calls. I want the foster parents summoned to court to eliminate false reports and misconceptions by BCDSS brainwashing Joshua.
- 15) I want to know more information about the foster care parents by BCDSS and the courts. I want to know the backgrounds of the parents or caretakers. I want to contest placements and be given the right to be a part of choosing the caretakers for my son. I want to go to church with my son and the foster care parents under court ordered supervision on a weekly basis. I want the label of “foster sister, foster mother, foster parent” eliminated off the court record and in regard to my children. BCDSS gives caretakers or paid providers false labels to belittle birth parents rights. There is no such thing as a “foster parent”, they are state contracted agents and should be called “temporary state care providers”. “Foster care parent” is a term that CPS and BCDSS invented. If I am denied the right to screen “foster parents” or know more information about these parents then I am appealing until the case gets out the lower courts for constitutional rights and due process violations. I am against TPR or adoption of my children and I always have been against the foster care system and foster care adoptions. Ms. Animashaun testified falsely that I stated that I never wanted to be a mother based upon hearsay evidence from Johns Hopkins ER doctors in 1998 when the children were removed, however she never got a notarized affidavit or sworn statement stating I do not want to be my children’s mother in the entire 5 years my children have been in the foster care system. I want to have BCDSS allow me to choose a family for Joshua that will allow all of us to work together as a community instead of using immunity laws and brainwashing against Joshua. The BCDSS paid caretaker for Joshua should be treated just like I have been in the court system and forced by court order to submit to me copies of their parenting classes, copies of their background checks, and they should be forced to by court

order to do everything I had to do including psychological evaluations. I had my privacy rights violated by the courts and BCDSS under threats to get my children back home and if I had to undergo unconstitutional treatment the caretakers should be forced to do the same. Joshua should see both the caretakers and I together to eliminate mixed signals and misconceptions. If the court and BCDSS will not eliminate the unjust treatment and enforce the “foster parents” to come to court, then Joshua does not need be in any caretaker’s home. There are shelters for children that Joshua can and must be in until he is returned home in my custody. The “foster care” system has not worked for my son and will never work for him. He needs to be in a hospital setting all of the time until he is 18 or until BCDSS returns him home. I am against everything BCDSS has done to my son and I am against MENTOR and the numerous “foster care parents” my son had in the past 5 years. There should not be any more “foster care parents” or psychologists assigned by BCDSS making money off my son. Joshua should be put in a permanent hospital setting or nursing home since “therapeutic foster care and therapy” has not worked since 1999 until now. Joshua needs his own pastor in this case and more men on the case than women. I want my son in a placement with a married Christian couple without any alleged “foster care siblings” in the picture. If BCDSS will not allow me to have the right to select placement I strongly recommend and appeal to have Joshua in a permanent hospital setting or nursing home for children until he is 18 years old or until placement is returned to my custody. Joshua needs stability that the foster care system has not provided supervised. He needs to be able to bond with me as his mother and if BCDSS and the courts continue to block birth rights and bonding Joshua should not be in any foster home for anybody to make money off of the professional abuse going on. I am highly upset at the fact that the police have been called on my son. My concern is that I don’t want him in prison if the police are called. The matter will get worse when he is a teenager in the system. BCDSS have contributed to the “anger and behavior” Joshua is having. I believe Joshua wants to come home to my custody and that reasonable efforts were never made on the case. I am relieved that Joshua is biting and acting out because I want Joshua home with me. I want Joshua to prove that BCDSS have failed and will continue to fail in how they have blocked everything.

- 16) I want Joshua court ordered to be permanently in a boy’s juvenile detention center, a state mental hospital, or court ordered to be permanently in the DJJ Center at 300 North Gay Street or a juvenile prison since Joshua has had alleged “police intervention” over 4 times (letter from MENTOR dated May 23, 2003 stated 2 occasions police intervention were necessary and email from Vanita Taylor dated 12/2/03 stated police intervention also), since Joshua has been accused by MENTOR and the foster care parents of stealing (Dr. Dryer testified to Joshua stealing on 6/25/03), since Joshua was accused of not having a conscience bad enough to have intentions of murder of drowning a boy which caused the boy’s parents to want to file a lawsuit against Joshua(This was reported by Rita Animashaun during a visit however it was not contested in court or brought up by MENTOR), and I want him in the DJJ Center or juvenile jail due to repeated allegations of physical severe assault to other students while in

foster care. I want Joshua in a permanent detention center for 6 years until he is 18 years old or a permanent hospital for 6 years due to the fact the BCDSS and the foster care parents assigned by BCDSS have failed and have also neglected and abused my son for 5 years. There should be around the clock supervision of Joshua in a detention setting or hospital setting permanently until he is 18 years old to eliminate false allegations by BCDSS and the foster care system. There should not be any more "police interventions" because my son would be in a permanent detention, permanent jail setting, or permanent hospital eliminating numerous hospitalizations and numerous alleged police interventions or more governmental abuse by BCDSS and the foster care system. Joshua's constitutional rights and due process rights were violated by not having criminal charges filed against me as his mother for the alleged abuse/neglect CPS allegations. All 3 of my children should have been permanently placed in an orphanage or state hospital until criminal charges were pressed and fair trials were conducted. My entire family was treated by BCDSS and the courts like property in a civil proceeding instead of filing criminal child abuse charges. BCDSS should have filed a charge to put me in a mental institution for the total 5 years due to the false allegations that I didn't want to be a mother and alleged schizophrenia allegations. I would have rather been put away in prison or a state hospital than to have been violated by BCDSS and the courts for 5 years without any accountability on CPS, BCDSS, and the courts part for my family. My daughters are fraudulently TPR because of my son and lack of due process. The BCDSS filed a TPR petition with the divide and conquer theory. My daughters' TPR is being appeal in the special court of appeals. There must be a court order for MENTOR or the permanent hospital to inform me of all the medications Joshua is on, how many times a day he is on the medication, the side effects of each medication, and the dosages of each medication so I can contest and appeal all medications given. For 5 years I was unjustly denied those rights to contest the medications given to my son and on 6/25/03 Dr Dryer failed to testify how often my son is on the medication and the dosages to allow me to appeal them. This is why I want out patient therapy eliminated and foster care eliminated from the case for my son. I want my son home schooled in the prison, in the hospital, or in the permanent detention center with it court ordered that the judge review my son's progress from the Calvert School or the Home School International. Joshua should be court ordered to have his mother and grandmother who have experience in home schooling to both come to visit Joshua on weekly basis to home school him. Joshua's maternal grandmother is a pediatric nurse and should be court ordered or allowed to be present at all visits and an active part of Joshua's life while I am present as Joshua's health care taker. My mother works as a school nurse and have years of experience in caring for children so she should be able to be present at the mental institution and the prison. BCDSS failed to allow my mother to come to all hospitalizations and this must be reversed by court order. I want Joshua in a permanent jail or hospital setting since there has been allegations on the 5/23/03 letter from MENTOR saying, "Joshua is a Severely Emotionally Disturbed child. He has a history of explosive and aggressive behavior which has led to several psychiatric hospitalizations. When the explosive episodes occur,

Joshua has broken windows, assaulted and bitten others, and been extremely verbally aggressive. These episodes often occur without warning and can last for long periods of time. Police intervention has been necessary to help subdue Joshua on the last 2 occasions.” BCDSS and MENTOR have made my son sound like another Mike Tyson, inhuman and even predestined to be delinquent. In 1996 when I was pregnant with my daughter India I was forced to put Joshua in physical restraints against my high risk pregnancy and when I requested that Johns Hopkins Hospital Dr. Fong put Joshua in a permanent setting like the Children’s Guild I was accused of mental neglect and abuse which caused removal of my son in 1996. BCDSS have false allegations that I voluntarily gave my son up and neglected him when the hospital placed child abuse charges when I requested assistance just like BCDSS and the foster care parents are doing now. I had to attend psychiatric counseling in 1996 by Rosemary Cook at Total Health Care to get my son back and my parents had my son for short time. The past charges were all expunged off the Central Registry however BCDSS still brought up the same expunged charges on the court stipulations and records in 1998 until now fraudulently. I have medical records from Kennedy Institute just like the reports from MENTOR and CPS that Joshua behavior or time outs lasted for long periods of time as a matter of fact when I was forced against my doctor’s orders by Dr. Fong to perform restraints on Joshua it was recorded that Joshua needed 20-30 minute restraints requiring over 3 people to subdue him. If I was forced by Johns Hopkins and the professionals in 1996 to deal with Joshua as if I was the blame why is it ok for the foster parents to call the police on my son and request hospitalization? In 1998 I cried out for the same help that the foster parents done now. I requested that my son be hospitalized on 6/18/1998 for burning my daughter’s foot and his behavior. I was handcuffed and locked up in the psyche ER without being told where my children were and I was not notified of any shelter hearing. However when the foster parents do the same thing they are not labeled as neglectful for alleged police intervention or demanding hospitalization. My son was not put on any medications from 1996 on back and I repeatedly demanded that my son be on medication for his behavior. Dr. Fong stated that my son was too young and when I kept on demanding medication I was accused falsely of neglect. None of these people or professionals are or were held accountable for their allegations or court ordered to come to court. If my son was put on medications and in a permanent hospital setting at a early age BCDSS and CPS would not be involved and my daughter’s would not be unjustly removed. I would have rather my son be in a state hospital at a early age than to go through what my family unjustly experienced. My children did not need to be adopted or in foster care, my son needed to be in a state institution or permanent hospital setting until he got better. This was never a child neglect issue on my part for the entire 5 years and before that. I still wanted my parental rights in tact but I wanted my son to be in a permanent hospital setting and none of the professionals involved would intervene or do anything until I was falsely accused of child neglect. They would rather accuse a single parent and target poor families than to put the blame and responsibility on themselves as professionals. The entire system failed my son. I want my name off the court record as a contact for being

summons because I am innocent of all charges and it should be court ordered that I come on a volunteer basis. I should not have any public defenders or attorneys when I am innocent for 5 years of all allegations. The TPR statute also applies to my son since 15 months passed and BCDSS should have been TPR my son also along with my daughter's. The TPR should have been consolidated since my son is the reason for the children being removed. I do not want to continue to come in and out of court and treated like a criminal against my constitutional rights unless the court presses criminal charges for the 5 years and CPS allegations. The public defender's address and contact information should be used as my contact information and the public defender should email me or call me by cell phone. I just want to bond with my son. What BCDSS and the courts are doing and have done to my son has devastated me and my family. I have had enough of the covering up and the professional abuse on my son's case. If they are going to repeatedly hospitalize my son and call the police on my son like an animal they must stabilize my son's situation and put him in a state hospital or state juvenile jail under the fraudulent "best interest of the child" phrase BCDSS uses to get bounties and bonuses for adoption and foster children. This is a money matter for BCDSS and the state of Maryland and the best interest of the child is far from the issue at hand. They need to leave my son alone. They have done whatever to my son and they can't be sued for redress. My family should be able to sue every person involved for compensation and discrimination on this case. What the courts and BCDSS have done and are doing is legal kidnapping and abuse against families. I believe that the BCDSS Director Floyd Blair must be court ordered to be involved in this case and informed of the professional abuse of this case. I have emailed Mr. Blair at fblair1@dhr.state.md.us and I am waiting for a reply.

The purpose of this study is to document litigants' perceptions of our legal system, and to investigate the correlation between Legal Abuse and the development of Legal Abuse Syndrome. The results of this study will be used to prepare suggested protocols for the state and federal courts to implement that will address the pro se and LAS issues.

To learn more about Legal Abuse Syndrome, see <http://www.legalabusesyndrome.org>.

Personal privacy for all study participants will be fully protected in accordance with:

The Privacy Act - <http://www.usdoj.gov/foia/privstat.htm>
HIPAA - <http://www.hhs.gov/ocr/hipaa/finalreg.html>

LEGAL ABUSE SYNDROME - QUESTIONNAIRE

File Code # _____ - _____
(For Internal Use Only)

Seekers of justice routinely report that the United States Court System does not serve their needs. Not only did those taxpayers find injustice and economic devastation to be the result of their endeavor to resolve problems, they found that their health was negatively impacted as well. This suggests a public health problem emanating from using the legal system in the U.S. For the following three reasons, we are conducting a survey to gather information to present to legislators, legal professionals and health professionals in order to effect positive change to the American Justice System.

1. The Study Authors are concerned that decisions made regarding our justice system are not data-driven; rather it appears that they are politically and profit-driven. This is a simple survey to gather data from a significant number of users of the justice system.
2. The Study Authors believe that illness created or exacerbated by the legal system is a preventable public health crisis.
3. The Study Authors have been unable to get current statistics and data pertaining to the effectiveness of the court/legal system as an affordable, realistic and helpful forum for citizens to resolve problems in a civilized manner. We have requested data from the U.S. Department of Justice and all other authoritative sources known to us but could find no regulatory or other authority that collects and maintains such statistical data.

PART ONE: Personal Information (NOTE: All information will be protected in accordance with the Privacy Act; Personal information requested for contact purposes only)

Name: _____ Birthday: _____
Last, First, Middle Initial (MM-DD-YY)

Address: _____
Street Address, including unit number if applicable

City State ZIP Code

Phone: (____) _____ (____) _____ (____) _____
Home Work Cell

E-mail: _____ @ _____ .com

Web Site URL: _____

Educational Levels (Highest Attained) _____

Disabled: Yes _____ No _____ Racial Affiliation: _____

Retired: Yes _____ No _____ Veteran: Yes _____ No _____

Country of birth: _____ Citizen: Yes _____ No _____

Employment Status at time of Litigation:

_____ Executive, CEO, CFO _____

_____ Managerial, Supervisory _____

_____ Professional

_____ Education

_____ Medical

_____ Legal

_____ Other

_____ Government (Federal, State, Local, County): _____

_____ Utility Company _____

_____ Retail/Wholesale _____

_____ Sales _____

_____ Science/Research _____

_____ Media _____

_____ Arts _____

_____ Student _____

_____ Self-Employed _____

_____ Business Owner

Annual Gross Revenue: _____ Under \$5,000,000/Year

_____ Over \$5,000,000/Year

_____ Unemployed

_____ Other: _____

_____ Industry: _____

Income at time of litigation: \$_____ /year.

PART TWO: Posttraumatic Stress Disorder (PTSD) Subscale for Invisible Victims

Answer True (T) or False (F):

1. _____ I have a good appetite.
2. _____ I wake up fresh and rested most mornings.
3. _____ My daily life is full of things that keep me interested.
4. _____ Once in a while I think of things too bad to talk about.
5. _____ I am sure I get a raw deal from life.
6. _____ At times I have fits of laughing and/or crying that I can't control.
7. _____ No one seems to understand me.
8. _____ I have nightmares every few nights.
9. _____ I find it hard to keep my mind on a task or job.
10. _____ I have had very peculiar and strange experiences.
11. _____ At times I feel like smashing things.
12. _____ Most anytime I would rather sit and daydream than do anything else.
13. _____ My sleep is fitful and disturbed.
14. _____ I am a good mixer.
15. _____ I have not lived the right kind of life.
16. _____ I wish I could be as happy as others seem to be.
17. _____ I am troubled by discomfort in the pit of my stomach every few days or more often.
18. _____ Most of the time I feel blue.
19. _____ I usually feel that life is worthwhile.
20. _____ I regret things more often than others seem to.
21. _____ At times I have a strong urge to do something harmful or shocking.
22. _____ I don't seem to care what happens to me.
23. _____ Much of the time I feel as if I have done something wrong or evil.

24. _____ I am happy most of the time.
25. _____ Often I feel as if there were a tight band around my head.
26. _____ I believe that my home life is as pleasant as that of most people I know.
27. _____ Sometimes I feel as if I would like to injure either myself or others.
28. _____ I lose out on things because I don't make my mind up fast enough.
29. _____ Most nights I go to sleep without thoughts or ideas bothering me.
30. _____ I have had periods in which I carried on activities without knowing later what I had been doing.
31. _____ I am afraid of losing my mind.
32. _____ I frequently find myself worrying about something.
33. _____ I dream frequently about things that are best kept to myself.
34. _____ I am never happier than when alone.
35. _____ I am so touchy on some subjects that I can't talk about them.
36. _____ Once in a while I think about things too bad to talk about.
37. _____ I have had peculiar and strange experiences.
38. _____ I easily become impatient with people.
39. _____ I have certainly more than my share of things to worry about.
40. _____ If I were dead, it would be okay.
41. _____ Most of the time I wish I were dead.
42. _____ I have strange and peculiar thoughts.
43. _____ I hear strange things when I'm alone.
44. _____ Terrible words come into my mind and I cannot get rid of them.
45. _____ Sometimes some unimportant thought will run through my mind and bother me for days.
46. _____ Even when I'm with people I feel lonely much of the time.
47. _____ I have sometimes felt that difficulties were piling up so high that I could not overcome them.
48. _____ It makes me feel like a failure when I hear of the success of someone I know.
49. _____ Whenever possible I avoid being in a crowd.

50. _____ I don't have the energy to start a new project.

Scoring:

Count the number of False answers for questions 1, 2, 3, 14, 19, 24, 26, and 29. Place the total here: _____.

Now count the number of True answers for questions not listed above. Place the total here: _____.

Add the totals together and rate degree of interference with a satisfying life:

Manageable discomfort	1 - 8
Life feels distasteful	9 - 17
Interference is of concern	18 - 27
Serious PTSD, needs therapeutic assistance	28 - 50

With slight modification, this test is adapted from Keane, T.M., P.F. Malloy and J.A. Fairbank). Empirical development of an MMPI subscale for the assessment of combat-related post-traumatic stress disorder. Journal of Consulting and Clinical Psychology, 52, 888-891.

PART THREE: Legal Abuse Questionnaire

1. Check each court applicable to your situation:

_____ Appeal: Federal Court _____ State Court _____

_____ Bankruptcy Court

_____ Civil Litigation: Federal Court _____ State Court _____

_____ Car Accident

_____ Other Accidental Injury (e.g., Slip 'n Fall, etc.)

_____ Contract/Civil Dispute

_____ Criminal Matter: Federal Court _____ or State Court _____

_____ Discrimination

_____ Employment

_____ Family Court

_____ Legal Malpractice

_____ Medical Malpractice

_____ Probate Court

_____ Product Liability

_____ Other: _____

_____ Other: _____

_____ Other: _____

Allegations: _____

_____ Divorce/Family

_____ Drug Court

_____ Mental Health Court

_____ Traffic Court

1. Attorney History:

_____ I retained a private attorney; Name(s): _____

_____ I was provided a public defender; Name(s): _____

_____ I paid my attorney(s) \$_____ to represent me.

_____ My attorney invested in my case being paid out of winnings (contingency fee).

_____ I went to court without an attorney (pro se or proper person).

2. My beliefs about the court system prior to litigation:

_____ I believed that the legal system would provide relief and justice.

_____ I believed that I had the right to a jury.

- _____ I believed that the jury was paid for out of tax dollars.
- _____ I believed that the jury could not be manipulated by the judge or any other party.
- _____ I felt inspired that the court system was there for me when I needed help.
- _____ I believed I could prevail (win).
- _____ I believed that all persons would tell the truth in a court setting.
- _____ I believed that the judge was fair and impartial.

3. Case process:

- _____ I completed my case with one attorney.
- _____ I completed my case with two to four attorneys.
- _____ I completed my case with _____ attorneys.
- _____ I never completed my case.
- _____ I have had an attorney withdraw from my case after a retainer was paid.
- _____ I have had two - four attorneys withdraw from my case.
- _____ My attorney filed bankruptcy after my retainer was paid leaving me without funds to pay for another attorney.

_____ I have had my case dismissed regardless of merit. State cause cited:

- _____ I handled my case on my own without an attorney.
- _____ I handled my case with the aid of a consulting attorney.

4. I experienced the following during litigation:

- _____ My case was called “frivolous and without merit”.
- _____ I was called a “vexatious litigant”.
- _____ My sanity was questioned by:
 - _____ the opposing party.
 - _____ the opposing party’s attorney.
 - _____ the presiding judge.
 - _____ my own attorney.

_____ a testifying witness.

_____ I was forced to submit to psychological examination(s).

_____ I was sanctioned by the court in the amount(s) of:
\$_____.

_____ Sanctions were called for by the opposing party.

_____ Sanctions were called for by the Discovery Commissioner.

_____ Sanctions were called for by the presiding judge.

5. Attorney interactions (Rate 0, Totally Disagree to 10, Totally Agree):

_____ I was completely satisfied with my attorney(s).

_____ I became angry with my attorney.

_____ My attorney threatened to withdraw unless I did things as he wanted them.

_____ My attorney stopped taking my phone calls.

_____ My attorney stopped allowing office visits.

_____ I could not understand the language and reasoning used by my attorney.

_____ I used all my economic assets and still made no progress on my case
(\$_____).

_____ My legal fees exceeded my yearly income.

_____ I found that pressure was brought on my life outside of court by my opponent's attorney.

6. Court Personnel interactions (Rate 0, Totally Disagree to 10, Totally Agree):

_____ I found them to be professional, competent and personable.

_____ I found them to be helpful.

_____ I found that they stayed within their mandates to avoid the practice of law.

_____ I found that they were as supportive of me as of the attorneys they serve.

7. Judges (Rate 0, Totally Disagree to 10, Totally Agree):

Competence:

_____ I found them to be professional and competent.

_____ I found them to be fair, unbiased, unprejudiced.

_____ I found them to be knowledgeable and able to explain the bases for their decisions.

_____ I found them to be courteous, respectful and of good demeanor.

_____ My cases always started on time.

_____ My cases moved along at a reasonable pace.

_____ I suffered no needless delays.

Number of Judges:

_____ I had one judge on my case, start to end.

_____ I had two or three judges on my case, start to end.

_____ I had four or more judges (list number: _____).

_____ I filed a peremptory challenge to remove a judge from my case.

_____ I filed a Motion for Disqualification on my judge.

Name the judge(s) who heard your case:

Consistency (Rate 0, Totally Disagree to 10, Totally Agree):

_____ My judge was consistent, and familiar with the case.

_____ When judges changed, the new judge became familiar with my case.

_____ My judge was consistent in demeanor.

9. Reporting Misconduct:

_____ I reported misconduct to:

_____ The State Bar

_____ The Judicial Discipline Committee

_____ The FBI

_____ The Department of Justice

_____ My Congress people

_____ Regulatory Agencies

_____ Other: _____

10. I reported as in #9 above; the response was:

_____ None

- _____ A letter of acknowledgement
- _____ An offer of assistance
- _____ A phone call
- _____ A formal or informal investigation
- _____ A formal or informal hearing
- _____ Complaint found to be meritorious, resulting in:

8. Health Care:

- _____ I had access to health care through:
 - _____ Individual Health Insurance, Group Health Insurance
 - _____ Military Insurance or Social Security Medicare
 - _____ Medicaid (Low Income)
 - _____ County or other Municiple Treatment for Low Income

- _____ I had no ability to obtain health care due to:
 - _____ No insurance
 - _____ Could not afford health care and had no insurance

- _____ IF uninsured or financially devastated during litigation, please answer:
 - _____ I would have sought medical attention due to physical symptoms incurred DURING legal process.
 - _____ I would have sought medical attention due to physical symptoms incurred AFTER the legal process.

_____ Rate 0 (Totally Disagree) to 10 (Totally Agree) - I believe the litigation had a negative impact to my health.

9. Impact on daily life (Rate 0, Totally Disagree to 10, Totally Agree):

- _____ I experienced no interference with my daily life as a result of my case.
- _____ When I spoke of my case with others (friends, family, co-workers), they understood and supported me in my efforts.
- _____ I experienced physical symptoms as a direct result of my case.
- _____ I saw physicians for treatment as a result of symptoms related to my case.

_____ I was prescribed medication as a result of physician visit; List: _____

_____ I missed work as a direct result of my case.

_____ I lost time spent with family and friends as a result of my case.

_____ I was unable to enjoy my usual pastimes as a result of my case.

_____ I was advised to give up my legal activities or my health would suffer.

_____ My family/friends became concerned that my legal efforts was causing me harm.

_____ I feared for my health and my life if I continued to litigate.

_____ I could not longer concentrate as a result of litigation.

_____ I became hyper vigilant as a result of litigation, always thinking, always strategizing.

_____ I became dismayed at false allegations made against me during litigation.

_____ I suspected that the judge(s) and/or attorneys or opposing party took pleasure in my discomfort.

_____ I felt helpless and/or trapped.

_____ I believe that the court system brings or strives for justice.

_____ I feel depressed, exhausted and discouraged as a citizen.

_____ I feel angry about our court system.

_____ I believe the practices of the court system are wasteful and/or ineffective.

_____ I feel that I have unfairly lost crucially important things in my life.

_____ I trust professionals in the legal system.

_____ I believe the court exists to transfer wealth to the wealthy and powerful.

_____ I believe that an honest taxpayer can achieve justice in the courtrooms.

_____ I believe that the courts were used to improperly facilitate the transfer or retention of property from me to a more powerful or influential entity.

Additional Comments:

PETITION FOR DISCRIMINATION/CIVIL RIGHTS LAWSUIT

TO:
CLERK'S OFFICE
Elected by Voters to 4-year term:
[Frank M. Conaway](#) (D), *Clerk of Circuit Court*, 2006
Courthouse East, Room 412
Clarence M. Mitchell, Jr. Courthouse
111 North Calvert St.
Baltimore, MD 21202
(410) 333-3733
e-mail: **frank.conaway@courts.state.md.us**
tty: 410-333-4389
web: **www.baltocts.sailorsite.net/clerkpage.html**
JUVENILE DIVISION
James L. Benton, Jr., *Manager*
300 North Gay St., Room A3300
Baltimore, MD 21202
(443) 263-6300
e-mail: **james.benton@courts.state.md.us**

**SUBJECT: CONSTITUTIONAL, BILL OF RIGHTS, DISABILITY LAW, AND
DISCRIMINATION VIOLATIONS COMPLAINT
CIVIL RIGHTS/DISCRIMINATION LAWSUIT**

**RE: request for jury trial, lawsuit against all parties for slander/character
assassination, acting abusively under the color of law, and punitive damages**

**[CRYSTAL YVONNE SWEENEY DIXON DOB 8/21/1970](#)
1527 Lester Morton Court Apt 5
Baltimore, Maryland 21205
443-622-5753**

JOSHUA AARON SWEENEY DOB 6/19/1991
Petition number: 898170004
ID Number: 0160897

LINDA ANN BEY DOB 7/20/1999
Petition Number: 899224004
ID Number: 0180543

INDIA YVONNE SWEENEY DOB 7/7/1996
Petition Number: 898170005
ID Number: 0172691

JOY ELIZABETH DIXON DOB 9/21/2002
1527 Lester Morton Court Apt 5
Baltimore, Maryland 21205
443-622-5753

VS

The Office of Public Defender, CINA Division (Child in Need of Assistance)
Vanita Taylor, Esq, supervisor chief attorney
 300 North Gay Street, 2nd Floor
 Baltimore, MD 21202
 443-263-8963 phone 443-263-8952 fax
vtaylor@opd.state.md.us

**Panel court appointed attorneys assigned by the CINA division of OPD
 negligent on the case:**

- A) **1998 attorney assigned- Nenutzka Villamar**, Law Offices of Britta
 Hugoson-Burnet 110 East Lexington Street, Suite 400, Baltimore, MD 21202
 (410)244-8100 phone, (410) 244-0141
 - B) **1999-2002 attorney assigned-Grace Kilchenstein**, 1122 Kenilworth Drive,
 Suite 400 Towson, Maryland 21204 (410)823-8744
 - C) **2002-2003 attorney- Susan Kirwan**, 200 East Lexington Street, Lower Suite,
 Baltimore, MD 21202 (410)244-1456 phone, 410-244-1459
- 2) **Legal Aid Bureau Inc., Children's attorney- Eileen Franch**
 500 East Lexington Street
 Baltimore, Maryland 21202,(410)951-7639 phone
- 3) **Edward Jeunette, BCDSS attorney; Yolanda Tanner,Esq BCDSS attorney**

6 Saint Paul Street, 20th Floor
 Baltimore, Maryland 21202
 (410)767-8684

4) Baltimore City Dept of Social Services, “social workers”
Arona Okojie, Rita Animashaun, Beverly McDermott, Supervisor
 3007 East Biddle Street
 Baltimore, MD 21213
 (410)361-4281

Parenting classes arranged by Aronda Okojie, BCDSS, at Mount Zion Baptist Church

*Mount Zion Baptist Church
 2000 East Belvedere Avenue
 Baltimore, MD 21239
 Pastor Mark Riddix
 410-426-2309

Queen Bellamy, BCDSS case worker
 1900 North Howard Street
 Baltimore, MD 21218

5) Barbara Burns, nurse practitioner at Johns Hopkins Hospital Harriet Lane Clinic
 John Hopkins Hospital
 600 North Wolfe Street
 Baltimore, Maryland 21287-1900

6) John Garity, social worker at Johns Hopkins Hospital Harriet Lane Clinic
Johns Hopkins Hospital
 600 North Wolfe Street
 Baltimore, Maryland 21287-1900
 Social Worker that called CPS on 6/18/1998

7) Cindy Fritz, social worker
John Hopkins Hospital and University of Maryland social worker
 600 North Wolfe Street
 Baltimore, Maryland 21287
 Social worker also at:
 University of MD Hospital
 22 South Greene Street
 Baltimore, MD 21202

8) Mount Washington Ped. Hospital

1708 West Rogers Avenue
Baltimore, Maryland 21209

9) Richard Kidwell, Managing Attorney of Johns Hopkins Hospital

600 North Wolfe Street
Baltimore, Maryland 21287-1900
410-955-7949 phone

10) Brian Sneed, Institute for Family Centered Services 1800 North Charles Street
Suite 908 Baltimore, MD 21201 (410)332-4575 or pager 331-7034

11) Dr. Fong at Johns Hopkins Inpatient Children Psyche Unit

Johns Hopkins Hospital
600 North Wolfe Street
Baltimore, Maryland 21287

12) Dr. Donna Dryer, MENTOR Network

Braxton Andrews, Supervisor at MENTOR

Kim Adgerson, social worker at MENTOR

7127 Ambassador Road
Baltimore, Maryland 21244
410-944-5055 ext 3063

13) Dr. Vassilis Koliatsos, Sheppard Pratt Hospital, neuropsychiatry program

Ann Seiler, social worker at Sheppard Pratt Hospital

6501 North Charles Street
Baltimore, Maryland 21285-6815

14) Dr. Dale Peterson, licensed psychologist

Metro Maryland Counseling Center

16 Greenmeadow Drive Suite 106

Timonium, Maryland 21093

410-561-9584 phone

410-561-9587 fax

Address at time Dr. Peterson completed CPS paid off evaluation:

20 West Aylesbury Road Suite 100

Timonium, Maryland 21093

410-561-9584

15) Medical Services of the Circuit Court for Baltimore City

Courthouse East room 100

111 North Calvert Street

Baltimore, Maryland 21202

16) John Hopkins Hospital Community Psychiatry Program

John Hopkins Hospital
600 North Wolfe Street
Baltimore, Maryland 21287
410-955-0424

17) Johns Hopkins Emergency Room Psychiatry Unit

Johns Hopkins Hospital
600 North Wolfe Street
Baltimore, Maryland 21287

18) Dr Ronald Lesser, neurologist since 1990

Johns Hopkins Hospital
600 North Wolfe Street
Baltimore, Maryland 21287
410-955-1270 or 410-955-3288

19) Dr Kleiner, psychologist, (Joshua's doctor in 1998, voluntarily referred Joshua)

98 North Broadway Suite 205
Baltimore, MD 21231
(410)327-2067

20) Dr Lisa Sheehan, psychologist (doctor in 1998 when children removed, failed to fight Johns Hopkins Hospital for false confinement and mistreatment)

98 North Broadway Suite 205
Baltimore, MD 21231
(410)327-2067

21) Dr Carlos Pardo, neurologist at JHH Outpatient Center

600 North Wolfe Street
Baltimore, Maryland 21287
410-955-2453

22) Johns Hopkins Home Care Group

1-800-288-2838
Stacey Garnett, RN 410-288-8080
Mark Huslage, in-home social worker 410-288-8125

23) Ms Agnes Brown, Family Support Services BCDSS

410-361-5005 ext 346

**24) Susan Officer, Administrative Law Judge
Office of Administrative Hearings**

11101 Gilroy Road
 Hunt Valley, Maryland 21031-8201
 410-229-4100
 1-800-388-8805
 Fax number 410-229-4111
 Re: OAH Case No. 99-DHR-CITY-41-0000027
 Baltimore City DSS v Bey

25) **Judge Martin P. Welch, Juvenile court judge**, TPR judge for November 2003
 111 North Calvert Street
 Baltimore, Maryland 21202

26) **Master Judge Koban**
 Clarence Mitchell Courthouse
 110 North Calvert Street 21202

27) **All master judges assigned on case from 1998 to 2003 for the entire CINA case:**

Clarence Mitchell Courthouse
 110 North Calvert Street 21202

***Judge Zakia Mahasa ,Judge Mahasa court ordered card to say “I love you Mommy after MENTOR made false allegations about Joshua. Joshua was removed from foster home any way despite MENTOR and BCDSS recommendations to block visits and bonding since 1999.**

***Bradley O. Bailey, Esq.**

***James P. Casey, Esq.**

Kathryn E. Koshel, Esq.

Richard D. Lawlor, Esq.

Joyce T. Mitchell, Esq.

***Gregory Sampson, Esq.**

Bright K. Walker, Esq.

28) **Attorney Grievance Commission of Maryland**
 100 Community Place, Suite 3301
 Crownsville, MD 21032-2027

29) **Dept of Human Resources, Shirley Brown-Policy Analyst in Office of Children and Family Services**
 311 West Saratoga Street
 Baltimore, MD 21201-3521
 1-800-332-6347
www.dhr.state.md.us

CRYSTAL SWEENEY DIXON, JOSHUA SWEENEY, INDIA SWEENEY, JOY DIXON, AND LINDA ANN BEY all files a formal complaint against all of the above persons in their individual and professional capacities. All parties acted without due process, in violation of federal US Constitutional and Bill of Rights, in violation of disability laws, and acted under the color of law abusively. CRYSTAL SWEENEY DIXON, JOSHUA SWEENEY, INDIA SWEENEY, JOY DIXON, AND LINDA ANN BEY all file a discrimination and civil rights violation complaint against the above parties for punitive damages, character assassination, slander, false testimony, false documentation, and unjust separation of a family for 5 years. CRYSTAL DIXON, JOSHUA SWEENEY, INDIA SWEENEY, JOY DIXON AND LINDA BEY is requesting a jury trial. Since Crystal Dixon is a member of AFRA, her family upholds the “declaration of hostilities” by AFRA as part of this formal complaint against the above parties. The “Declaration of Hostilities” from AFRA is located at www.familyrightsassociation.com A list of directors and contacts is at the AFRA website. AFRA is a national organization.

The following events occurred:

1. In 1995 Joshua Sweeney was regularly seen at Kennedy Krieger Institute at the behavioral clinic for home visits by Dr. Susan Parks and Dr. Harrison.
2. 1996 Joshua was enrolled at Dunbar Daycare Center located next door to Chick Webb Recreation Center and Paul Laurence Dunbar Middle School. The daycare made false allegation of physical abuse in 1996 by calling the police without a warrant. I was pregnant with India and Joshua had a tantrum in the snow, fell outside, hit his face in the snow, and after the daycare interrogated him they made false reports of physical abuse. There was never a warrant. Joshua was interrogated by police and daycare without Miranda rights protection. Joshua had the right to have a lawyer present since he is special needs and disabled regardless of the fact the daycare and police failed to press criminal charges. Daycare center should have contacted the emergency contact numbers on the daycare center card and an attorney. Joshua should have had a badge on his person with the Miranda rights on it stating he is not obligated to answer anything unless an attorney or his guardian is present. Daycare centers should not interrogate children isolated without legal protection. Emergency numbers should have included a lawyer for the children in case of false child abuse reporting by daycare centers and hospitals. Miranda rights are for civil right protections especially for disabled children.
3. Susan Parks in 1996 recommended during a home visit for Joshua to be admitted in the hospital. I was falsely accused of not being able to care for Joshua or stating that I could not take care of Joshua when Dr. Susan Parks made the recommendation without putting her statements in writing for Joshua to be hospitalized. Joshua was hospitalized for one week in Johns Hopkins Hospital after Dr. Parks made the recommendation, the hospital did a few tests, he had several 20 minute tantrums where 3 or more people had to retrain him, and Johns Hopkins still released him.

4. I had to admit him again after Dr Parks' recommendation to hospitalize him, I asked for thorough testing, for him to be on medication, and he was having 20 minute tantrums again. I didn't have an attorney to enforce or demand that Dr. Parks put her recommendations in writing and eliminate the false allegation of child neglect/child abuse. I didn't have the hospital visits recorded or Joshua's behavior recorded which made it easy for the hospital to make false allegations. None of the home visits by Dr. Parks were taped recorded by the Kennedy Institute behavior clinic. I failed to keep my home monitored by video. There was not assistance by BCDSS, Johns Hopkins Hospital, or Kennedy Institute in getting home monitoring video equipment to document Joshua's behavior to eliminate false child abuse reporting. I went to the hospitals and clinics for assistance and they failed my family.
5. I was under doctor's orders by Total Health Care to be on bed rest for a high risk pregnancy with India, but I was charged by Dr. Fong, the pediatric psyche doctor, while Joshua was hospitalized, as unfit and negligent because Dr. Fong and the psyche social workers forced me against my doctor's orders to retrain Joshua physically against my pregnancy. Dr. Fong labeled me mentally unstable to care for Joshua because I challenged the discharge and requested that he be placed in the Children's Guild and be on medication before he returns home. Again I should have taped the conversations by Dr. Fong and taped the fact that Dr. Fong demanded that I was mentally unstable. I should have immediately called a lawyer for an emergency consultation requesting that the lawyer come to the hospital. My GYN doctor provided documentation that I was not to do any physical time out or restrains with Joshua during my pregnancy and that I was on bed rest. Dr. Fong stated Joshua was too young to be on medication at 5 years old and that I had to deal with having to physically retrain him against my OB/GYN doctor. Dr. Fong forced me to go to the outpatient psyche doctor before they discharge Joshua and I explained to the outpatient psyche doctor while Joshua was hospitalized what my OB/GYN doctor stated. Again I should have gotten a lawyer immediately and demanded that everything be put on tape or in writing by Dr. Fong. At the time I was trying to get help for Joshua and was not getting the assistance needed. The hospital made false report to CPS. My girlfriend, Loretta Byers,(who lives on Wolfe Street in Baltimore Maryland and 3 children of her own, she is also a friend in church) went to the hospital and went to the courts for an investigation to be considered to have Joshua in her home. There was a background check performed on Loretta Byers. Loretta Byers witnessed for herself at the hospital the fact that Dr. Fong diagnosed me as mental unstable and the fact that the hospital took Joshua. I didn't give Joshua up to CPS or the hospital. My parents had Joshua for 30 days; I had to go to mental health counseling at Total Health Care with Rosemary Cook to get Joshua home. CPS made false reports that I could not care for my son and neglected him. BCDSS has on their reports and stipulations that I neglected Joshua and gave my son up when I had Loretta Byers as a support in 1996 at the hospital. There should be a record of her background check done by BCDSS in 1996 and the fact that the

- hospital took Joshua against my will because I was seeking to have him on medication with the Children's Guild. Patricia Barger from Kennedy Institute Family Support Services was also there in court with Loretta Byers and can testify that Joshua was removed at the hospital and that I didn't give him up.
6. The CPS and BCDSS charges were unsubstantiated and off the central registry by Sheritta Barr-Stanley on 5/31/1996 and there was a statement given that I would be expunged off the record.
 7. Johns Hopkins East Baltimore Mental Health Partnership made child abuse report without a warrant on 9/17/96 Joshua and India was investigated for physical abuse by police and CPS without due process, criminal charges, and warrant by court judge. There should not been any investigation without criminal charges pressed with a warrant. Joshua was interrogated without parental presence and his stories kept changing up. Miranda rights were violated for both my children and me. We had a right to remain silent until a lawyer is present rather criminal charges were pressed or not.
 8. School bus accident 5/1998 caused Joshua's behavior to regress backward. Joshua was seeing Dr. Kleiner, psychologist, on a self made parental referral for his behavior on 6/17/98. Joshua and India were playing in bedroom and Joshua accidentally burned India's foot while I was in the kitchen cooking. This was confidential information I could have kept to myself about the burn and accident after several false CPS allegations. First Aid was applied to India's foot, India was playing with Joshua, and was fine for 3 days, and I contacted the nurse practitioner to schedule an appointment for Joshua's 7th birthday. India's burn was not a 3rd degree or 2nd degree burn. I failed and the hospital failed to take photos of the burn that I should have kept confidential since it was an accident and not serious. I should have called my mother who is a nurse to take photos of the burn or be a witness at the hospital when I took Joshua and India for his 7 year old check up. On 6/18/1998 the day before Joshua's birthday I waited hours at the clinic to be seen and should have left within one hour. Joshua and India was removed from my custody at the hospital just like when Dr. Susan Parks recommended hospitalization and Dr. Fong made false CPS reporting. I requested hospitalization for Joshua because of the school bus accident and his behavior, I requested medication at 7 years old for Joshua, I was falsely charged with burning India's foot without criminal charges and a warrant, I was handcuffed and locked up in the ER psyche room against my will with tranquilizers and drugs, and discharged without being told where my children were taken. There weren't any reasonable efforts to contact family to pick up the children to prevent CPS. I was requesting assistance and medication for my son and the hospital called CPS. There were false reports that I stated I didn't want to be a mother when I stated the fact that my son needed intense help and medication. The nurse practitioner and social worker that made the false report stating I didn't want to be a mother failed to put this false statement in a notarized sworn affidavit and come to court so I could face my accusers in court. I told the nurse practitioner about the

- burn on India's foot and there were not photos taken of the burn. There were never photos of the false burn in the BCDSS or CPS file. There was not any police report about the burn. After I was discharged and locked up against my will by the ER in Johns Hopkins Hospital on my son's birthday I had side effects from the medication, I was sick for days, I failed to take photos of my arms and hands where I was handcuffed and restrained in the ER, and I failed to get an attorney immediately after the false imprisonment at the ER against my will. It is BCDSS and juvenile court policy to have a shelter hearing within 72 hours after they kidnap or remove children, I was not contacted to attend the shelter hearing to contest having my children stolen by CPS and the hospital the week after 6/18/1998. The hospital has on file who to contact in case of emergency and nobody was contacted by the hospital to pick up the children instead of CPS. There was not an attorney called. The nurse practitioner and the hospital failed to contact any emergency contact on the medical file. Joshua's father was not contacted. I had friends from church and neighbor I could have called since it was Joshua's birthday week to contact for emergency. I was falsely arrested in front of my children and lied on. Joshua was 7 years old and can remember seeing me handcuffed and locked up. BCDSS is feeding him falsely with statements that I do not want to be a mother. This is what the nurse practitioner and social worker stated falsely and was not summoned to court for 5 years from 1998 to 2003.
9. The fall of 1998 I was given a public defender, I was not aware that my parents had my children in August until we went to court; I was denied a trial to contest the initial CPS and hospital allegations. I was still under trauma. I was then pregnant with my 3rd child. I was not given the CINA or Office of Public Defender manual or policies so I would know the full procedures of the courts and what to expect. I was not given the CPS manual that every parent who has children stolen must have to know the procedures CPS and DSS must obey. There is a 400 page manual for CPS workers and DSS to follow. I didn't know anything about master judges, contesting hearings, appeal hearings, or trials. I was never prepared in advance by the public defenders. The supervised visits were not court ordered. The public defender should have demanded that all BCDSS and CPS stipulations be reviewed, signed and dated, and appealed by the public defender. I was against supervised visits in 1998 from the start. There should not have been any parenting classes, psychological evaluations, supervised visits, or anything else done until the entire case was aggressively appealed and fought in court. I was forced to quit my job or employment and I hit rock bottom after the children were removed. I worked at Hunt Valley and testified to the master judge that DSS had to schedule everything around my work schedule. I lost employment because of being forced to attend parenting classes and visits during my work schedule and having to come to court repeatedly for false charges when there were not criminal charges pressed. I also had to attend parenting classes during my 3rd pregnancy which added more stress and made me lose employment. CPS made false reporting that I could not

keep a job and could not get along on my job when I got awards from my job during that 1998 year. The public defender was not effective in defending me in the 1998 year. Aronda Okojie was the BCDSS worker in 1998 and I contacted her about parenting classes by Catholic Charities. Aronda Okojie had from the fall of 1998 to June 1999 to make arrangements for the psyche evaluation, the parenting classes, and the requirements for the BCDSS service plan. Aronda Okojie should have never given anything to me to sign without having my attorney present knowing that I was accused of schizophrenia by the hospital in 1998 and under trauma. My attorney should have demanded that everything be court ordered by a judge and that a judge deem me abusive or neglectful with the opportunity to contest the initial CPS allegations. I failed to get a BCDSS referral slip from Aronda Okojie with my attorney's signature and a judge signature stating that I must complete parenting classes listing the number of weeks and hours for the classes, listing what the parenting classes must involve and the parenting assessment must have been court ordered. Aronda Okojie referred me to Mount Zion Baptist Church for parenting classes which was unconstitutional and without due process. I didn't get a court order to attend these classes. Aronda Okojie had me sign a BCDSS service plan April 1999 that should have been given the fall of 1998 when she got on the case. The April 1999 service plan stated I was to have custody of India by August 1999. The case for Joshua was separated against my will and the case should have been consolidated and appealed by the public defender. Aronda Okojie contacted Kennedy Institute about parenting assessment and they told her that there isn't any program for parenting assessment. The fact of the matter is the parenting assessment was not listed on the April 1999 service plan and the public defender refused to appeal and contest it. The public defender in 1998 dropped out the case without any notice or explanation and Grace Kilchenstein was assigned a public defender in 1999. I provided medical records under duress in which I never seen or was given a copy of my medical records. This was not full informed consent. I signed BCDSS medical release forms that should have been reviewed by the public defender and the judge. My privacy rights were violated. Medical records before 1998 should have been eliminated off the case. Grace Kilchenstein refused to contest in 1999 and she stated for me to wait until my 3rd child was born. I had Linda prematurely because of Aronda Okojie and the stress from the legal abuse. My due date for Linda was on my birthday 8/21/1999 and Linda was premature because of the legal abuse from BCDSS worker Aronda Okojie and my public defender, Grace Kilchenstein. I went to Sheppard Pratt voluntarily without a doctor referral from the Epilepsy Association of Maryland, which came to my home on a self referral, and I started dilating May 1999 when I went to Sheppard Pratt. I was under tremendous stress from the parenting classes, the BCDSS stipulation service plan by Aronda Okojie that was without a court order, I had in-home nurses, I had poor treatment by the Johns Hopkins OB/Gyn social worker Cindy Fritz, and when I went to Sheppard Pratt the doctor stated I was not in labor because I didn't go to GBMC hospital next door. I didn't have any money in

my pockets because cab vouchers were provided for me to go to Sheppard Pratt under my insurance. I refused to answer any of the doctor's questions at Sheppard Pratt and I was in pain. The doctor at Sheppard Pratt had to give me money out of their petty cash account and make cab arrangements. I had a parenting class that same day I went to Sheppard Pratt and so I asked to have the cab send me to Mount Zion Baptist Church. I should have told the pastor and the parenting class coordinator what happened to me at Sheppard Pratt and I should have gotten a lawyer against the doctor. I was under so much pressure and physical pain. I had the psyche evaluation at Johns Hopkins Hospital, parenting classes, and the ordeal at Sheppard Pratt at the same time. I was afraid of miscarriage and I was in a lot of discomfort. I went to Johns Hopkins ER and the doctor stated I was dilating contrary to Sheppard Pratt. When I completed everything on the BCDSS service plan May 1999 I told my son Joshua that he was coming home at a visit and that was when Aronda Okojie and my attorney reneged and told me that everything had to wait until I had Linda. I didn't know that BCDSS would take Linda at birth or put stipulations on me without a warrant at the hospital. I believed that my children would come home that June 1999. I was devastated and under so many traumas that I didn't think to get a private lawyer or tape everything being done to me. I was hospitalized in 3 hospitals while pregnant with Linda to keep her from coming out prematurely. I was put in Union Memorial, Johns Hopkins Bayview Medical Center, and another hospital I can not remember where I was, but I was put on mercury by IV to prevent her from coming out prematurely from the stress and abuse by BCDSS. I lived with my parents before I had Linda and BCDSS was surprised about the fact my parents supported me because of the premature labor and the mercury treatment, so BCDSS put the stipulation to have Linda and I under 24/7 supervision without telling me in advance in May 1999. BCDSS failed to call my public defender and prepare me that I was going to be under a stipulation during the pregnancy. Cindy Fritz told me after I had Linda in the hospital that my baby was going to be removed and could not come home. She lied about allegations that I didn't have anything for my baby. My father and mother physically picked me up in their home, put me in the car, drove me to Johns Hopkins Hospital after my water broke in the basement of their house, and my sister was there when Linda was born. When I had Linda I almost had her in the lobby of the hospital because the hospital at first would not let my family to be seen, they stated that they wanted birth certificates, even after the fact I was seen for premature labor by 3 hospitals and was on mercury, they had this in my medical record at Johns Hopkins Bayview Medical Center. I was offered information about a blood transfusion with my family present during the pregnancy and BCDSS failed to mention these facts in their reports because it exposes the legal abuse on the case. My father signed under duress the BCDSS 24/7 stipulation because he wanted his grandchild home and wanted to help in support. There should have been a lawyer involved to contest the 24/7 stipulation and having my baby removed or prohibited from coming home based upon

allegations by CPS/DSS in 1998. The service plan was completed May 1999 and Linda had nothing to do with those 1998 allegations. Furniture and baby clothes were provided by me. My father and I went to the Franciscan Center together to get a crib and baby basket. My mother got the carseat from Johns Hopkins Safety Seats program. So when Cindy Fritz made the false allegations of child neglect my parents already had proof of furniture and clothing Cindy Fritz and BCDSS lied about in court. There were not receipts provided by the Franciscan Center or photos of what my family and I bought. BCDSS made false testimony that they provided assistance for Linda. BCDSS failed to provide receipts and documentation or photos of what they falsely alleged they bought Linda. Linda was removed from my custody at John Hopkins Hospital with a 24/7 stipulation without a warrant and court order that I had to live with my parents. The hospital would not allow me to take Linda home based upon the 1998 charges. The public defender failed to get a court order and contest the removal of Linda. Linda got very sick and was hospitalized. BCDSS and the hospital failed to testify that I spent the night in the hospital with Linda while she was there. I didn't have a camera or someone to take photos of me with Linda while in the hospital as evidence that I stayed with Linda and was not abandoning my child. I went with my parents under the 24/7 stipulations BCDSS put on me against my will because I wanted my baby home with me. I had to sit there and watch my baby get a spinal tap at Johns Hopkins which disturbed me. I was deeply concerned and worried about Linda because she had tubes in her nose. My mother would not take her to the hospital when my sister and I noticed that Linda was very sick. I couldn't do anything because I was under the 24/7 stipulation. Linda was transferred to Mount Washington hospital, I was still under the 24/7 stipulation and could not see my child without my parents. My parental rights were violated and stripped. I was forced to be like a teenager instead of a grown adult and there was not any public defender contacted by BCDSS or a lawyer to fight what was abusively going on. I was treated guilty. It was too much to bear. I wasn't respected and treated like I was inhumane and like slave trade times where children were taken straight from the mother's breast and sold off. Postpartum depression and the trauma of the case were not considered by anybody. Nobody cared. I gave Queen Bellamy documentation to fight for my baby and that was manipulated falsely. I got sick and was put in the hospital. BCDSS made false charges again that I voluntarily gave my baby to them and neglected my baby. I was forced to take another psyche evaluation on 10/1999 after I had Linda and the public defender failed to contest to put a limit to the number of psyche evaluation done without due process and in violation of constitutional rights.

10. I was forced to take another psyche evaluation where the psychologist and BCDSS failed to give me copies of my medical records before the evaluation and failed to have the public defender review the medical records being used for the evaluation. I had the right to know what was being used by BCDSS against me in the 10/1999 psyche evaluation and the evaluation by Dr. Dale

- Peterson. BCDSS stated I requested Christian doctors which was true but the main reason why I had more stipulations was because I took several BCDSS contracted evaluations under duress against my will to get my children home. The 5/1999 psyche evaluation Ms. Okojie demanded was not appealed and contested by the public defender and there was not full informed consent. All of the psyche evaluations were done under trauma and without the initial allegations being appealed. I was not obligated to complete any evaluations and have my children abusively used as bounties and have my medical records used as a threat to take my children without first seeing the medical records. There should have been a hearing first to contest having medical records used.
11. From 1998 to 2003 I requested weekly phone calls with my 3 children. The visits were only biweekly with one hour a visit. The BCDSS workers used most of my time interrogating me without video or audio tape. I repeatedly requested that all visits from 1998 to 2003 be taped for the court, for the public defender, and to eliminate false reporting. BCDSS prohibited bonding during the visits. Everything was dictated by the workers and the public defender failed to appeal supervised visits. I should not have been treated guilty of neglect or abuse or mentally ill by the BCDSS workers and the foster parents. BCDSS testify as if I neglected visits when I repeatedly requested alternatives to protect my constitutional and civil rights. I requested home visits, visits at a church, and other alternatives. I was not obligated to attend any visits at BCDSS without a court order. The court or judge must have required what hours and days for the visits and the public defender failed for the entire 5 years to appeal visits. I wanted my children home since 1998. I failed to tape record conversations with BCDSS and the public defenders on the case where I repeatedly requested appeals and requested alternatives to visits. I repeatedly stated I am innocent.
 12. MENTOR and Dr. Dryer made recommendation since 1999 without a court order to prohibit visits with Joshua. I didn't know anything about Mentor in 1999. I was not given school photos or decent photos of all 3 children. I repeatedly requested photos of my children since they were stolen in 1998. I requested about buying clothing and giving money for the children and BCDSS along with the public defender ignored my requests. It was not court ordered to have financial arrangement to support the children. I was ignored about support and I lost employment because of BCDSS so BCDSS forced me to get on SSI disability. My job could not keep me because I kept missing days from work from the false CPS charges with "supervised visits" and court dates. I sent things by certified mail and they were rejected by BCDSS in support of the children. I requested that BCDSS be eliminated and that everything be given directly to the judge to review to have court ordered to be given to the children. BCDSS continued to block everything. I gave more than just toys to my children. The public defenders on the case and the BCDSS workers were not supportive with reunification from 1998.
 13. From 2002 to 2003 Susan Kirwan stated that she was insecure about the case. Susan Kirwan without my husband and I consent had BCDSS come to our

home to investigate Joy Dixon, my 4th child, without a warrant, when all Susan Kirwan had to state was that she needed more time on the case. Judge Koban allegedly sent BCDSS to our home. BCDSS came to our home without a warrant or court papers. Our rights were violated by Susan Kirwan, Judge Koban, and BCDSS. Susan Kirwan wanted to perform investigations without our full consent and telling us exactly what she will be doing. We gave her permission to discuss issues with doctors after she put her statements or questions in writing for us to review as a married couple. We requested that everything be taped or on notarized affidavit for the medical release. Susan Kirwan was upset because she didn't want to be held liable or accountable for anything. At the TPR hearing my husband and I both discussed with her our complaints and we gave her a statement that was lawyer-client confidentiality or between just us in which she was to read and revise it. We gave her copies of the document by email before the TPR, the document was statements and issues she made to us on the phone and by email in which we demanded that she honestly tell the Office of Public Defender or the judge about since 2002 when she got on the case, and Susan Kirwan used the document just like when she had BCDSS come to our home against Joy and she lied to the judge. I then went prosea at the TPR hearing after waiting from 8:30am to 3:30pm with my husband and my baby under a lot of pain from endometriosis(after having disability accommodations) because of the lack of trust with Susan Kirwan especially since she betrayed my husband and I just that morning. Judge Welch at first stated he was going to have a default hearing where both sides present evidence and he make a decision behind the chambers then Judge Welch changed it to a biased trial. On 10/31/03 which was Halloween I stated that my back was against the wall and Judge Welch stated about the 15 month TPR rule. My husband stated that Judge Welch was against me then. Susan Kirwan on January 16, 2003 had me in her office for hours for another psyche evaluation without my husband present or taped recorded and she talked Dr. James Olsson out of defending the case because Susan Kirwan personally felt we should TPR. Grace Kilchenstein in 2002 stated that I should TPR however Grace Kilchenstein is one of the reasons why the children were TPR because there was not a trial and she failed to contest May 1999 against Aronda Okojie and DSS. I was not given the Office of Public Defender or CINA policy so I didn't know under trauma what was my rights or the process. It was arbitrary to have Judge Welch, Susan Kirwan, or anybody TPR when neglect was on the public defenders part in defense. It is arbitrary to state any 15 month rule merely on the passage of time and that is what Judge Welch was doing. BCDSS testified at the TPR hearing that I failed to complete parenting assessments when nothing was court ordered and the public defenders failed to fight anything. I didn't tape everything done by the hospitals, the public defenders, and I should have for protection of my family's constitutional rights. I had the right to contest the representation for my children and get private lawyers for my children. I lost my job because of BCDSS and the false allegations. There was not any

assistance by BCDSS to keep my job or work so I could financially support myself and my children. I needed to be on a BCDSS program get off welfare to work and instead I was under trauma forced to survive on my own. At the time when my children were taken Joshua was on SSI and I was working and going to college at the same time. We had income in the home. Then I lost everything when my babies were stolen on my son's birthday. There were not any services offered by BCDSS. I was forced to have psyche evaluations for discovery and evidence not for reunification or to help my family. There were not any anger management or rehabilitation services provided. If I was such a detriment to social and harmful to my children BCDSS should have court ordered to have my tubes tied or hysterectomy to make the animal type abuse complete. Ms Animashaun and my mother called me on the phone and recommended that I get my tubes tied but they would not but it in writing and I failed to tape record what was told to me. Yet BCDSS and the hospital put the false allegation that I didn't want to be mother. BCDSS threatened and used my children to get my medical records and that was enough in June 1998 to court order for me to be spaded like an animal and get a hysterectomy. I have endometriosis and don't know how long I had the condition, it's hereditary, it's a miracle that I had 4 children and lived, endometriosis is painful and disabling to the point women can not work on jobs, and if I was so unfit for BCDSS to take my babies they had their chance to court order for me to be permanently in a mental institution, to be put in prison, or have a complete hysterectomy. They did none of the above because the state gets bounties for stealing children rather than in-home services to prevent foster care. I would have rather been in jail, in a mental home, or have a hysterectomy than to have my family unjustly separated and terrorized. I could see if I was being punished for having children out of wedlock but the case is plain out discrimination of the worse kind. There were documents eliminated by BCDSS and false reporting because I lacked supports. My son was placed in several foster homes and prohibited from having weekly phone calls.

14. Joan Sweeney (maternal grandparent), Linda Sims (great maternal aunt), Endeara Sweeney (maternal aunt), BCDSS, and MENTOR all conducted a visit during a weekend or Saturday in 2003 without a court order. I requested decent photos of my children and MENTOR gave professional photos of the children to my family. BCDSS and MENTOR should have court ordered all visits with grandparents and extended family. The Office of Public Defender should have contested the fact that MENTOR and BCDSS allowed the maternal grandparents to have more rights. There should not been any weekend or Saturday visits by any family members without my presence or without matter being appealed in court by a court judge. My parents gave India and Joshua up back into foster care in 1998 and BCDSS manipulated my parents under duress with the 24/7 stipulation to have me live in their home after Linda was born. BDSS interrogated both my mother and my aunt during the visit. I received emails from my maternal aunt about the visit. BCDSS, MENTOR, and the Office of Public Defender failed to have

my parents, my sister, my aunt, and my extended family summoned to court as witnesses. Rita Animashaun testified about my sister during the TPR hearing however BCDSS didn't summon my sister to court so what was stated by Rita Animashaun was completely hearsay testimony. My father should have been summoned to court about the 24/7 stipulation, about the fact we went to the Franciscan Center to get a crib and baby clothes for Linda, and have my father testify that I was living with them before the 24/7 stipulation due to premature labor with Linda. The visit arranged by MENTOR and BCDSS should have been video taped and audio taped for the Office of Public Defender and court. In 1998 BCDSS would not allow my family or me to visit Joshua at his school, Morvania Park Elementary, as a matter of fact my mother stated that BCDSS put a retrain order on her in 1998. All visits with my family should have been arranged by the court and contested in court. My family has not been a stable support system before BCDSS put the children in foster care in 1998. My mother and father would hardly call me or my children. My parents and sister would only contact us or have communication for "emergency" because of the fact I have been excommunicated as a Jehovah's Witness since age 18. Occasionally they would want to be part time grandparents or supportive, however, BCDSS used my mother as a pond in their case. My parents divorced in 2003 which is part of the reason for my mother giving my children back into foster care. BCDSS conducted investigations without warrants and criminal charges while interrogating my family. MENTOR and BCDSS stated that Joshua wanted to see his grandparents and didn't want to see me, however, since 1998 BCDSS would not allow mother-son or decent bonding with my children. Everything was dictated and abusively strategize/choreographed by BCDSS. My children were acting more like robots than children. This is why everything should have been taped for the courts to see the abuse. The entire visit were conducted to make sure my children viewed me as "bad or crazy" instead of their mother. Since 1998 my children called their foster parents "mommy" and I contested that verbally because I didn't appreciate being treated guilty of child abuse or neglect when there were not any criminal charges pressed. My son would talk during the visits to me as if he was saying what the BCDSS workers and his foster parents brainwashed him to say. There should have been in-home visits with my family and I by court order and the supervised visits at BCDSS should have been contested. There should have been court ordered visits and weekly phone calls in the foster parents' homes for all 3 children where my family is present along with taping of the phone calls and visits. It gave my children mixed signals to kidnap them without due process and give the foster parents more rights. The foster care placements should have all been contested and appealed. I had the right to know what schools my children were placed in, I had the right to know their addresses in foster care, I had the right to know what hospitals they were placed in so we could visit, and I had a right to function the same way as when they were home. My parental rights were never terminated and so limited guardianship should have been contested in its

definition. Limited guardianship should only mean that foster care is just a babysitter or temporary placement. I had the right to go to doctor's visits with my children and counseling with my children. The Office of Public Defender was given forms from CPS Watch at www.epswatch.com to contest limited guardianship, visitation, medical issues, and make sure my rights as a parent were not violated by BCDSS. When BCDSS took my children in 1998 they stripped me of my parental rights before the TPR hearing. I didn't voluntarily put my children in foster care, they were kidnapped, and stolen from me.

CRYSTAL DIXON, JOSHUA SWEENEY, LINDA BEY, JOY DIXON AND INDIA SWEENEY all petition that the above parties are held accountable and that a jury trial exposes the abuse of our family. We request that we get financial compensation for the permanent damages to our family. Each person should get 10 million dollars a piece for the permanent damages and scars BCDSS and CPS caused. My children should be financially free and millionaires for being unjustly separated by the government. We are requesting that CPS return all 3 children to their biological mother and that the foster parents involved in the case be eliminated. The foster parents must be support systems but parental rights must not be terminated for adoption. Adoption must be reversed and appealed before a jury trial consolidated as one case and appealed before the Court of Appeals for federal constitutional violations. The 15-month rule for TPR is unconstitutional and all of the parties acted under the color of law abusively. This case is a matter of discrimination.

WITNESSES TO BE SUMMONED TO COURT ON CRYSTAL DIXON, JOY DIXON, JOSHUA SWEENEY, INDIA SWEENEY, AND LINDA BEY BEHALF ARE AS FOLLOWS:

- 1) Joan Sweeney and Endeara Sweeney, 4520 Parkside Drive Baltimore, Maryland 21205 phone (410)488-6245
- Linda Simms, (301) 505-2684 home phone; (301)675-4081 cell phone,
- 2) P. O. Box 19 Temple Hills, MD 20757 TeddyBSims@aol.com
- Willie Sweeney, 443-540-8164 cell phone, P.O. Box 1242, Baltimore, MD
- 3) 21203
- Institute for Life Enrichment, Dr. Mary Taylor-Ennis, 5601 Loch Raven
- 4) Blvd. Suite 301, Good Samaritan Hospital Professional Bldg. Baltimore, Maryland 21239 (Multicultural evaluation done to contest BCDSS and Dr. Dale Peterson's evaluation; Dr. Ennis' report was favorable requesting visits and more honest contesting Dr. Peterson's report) BCDSS and the

Office of Public Defender failed to summoned Dr. Ennis at TPR hearing and for Joshua's hearings/trials.

Frances Phillips, Mount Zion Baptist Church, parenting class director

5)

*Mount Zion Baptist Church
2000 East Belvedere Avenue
Baltimore, MD 21239
Pastor Mark Riddix
410-426-2309

COPIES OF THIS PETITION FOR DISCRIMINATION/CIVIL RIGHTS LAWSUIT HAVE BEEN MAILED TO THE FOLLOWING ON MARCH 2, 2004:

Edward Jeunette and Yolanda Tanner, Esq, BCDSS attorneys,

1)

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The Office of Public Defender, CINA Division, Vanita Taylor,

2)

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CRYSTAL YVONNE SWEENEY DIXON
JOSHUA AARON SWEENEY
LINDA ANN BEY
INDIA YVONNE SWEENEY
JOY ELIZABETH DIXON

v.

CIVIL ACTION NO. AMD-04-675

OFFICE OF THE PUBLIC DEFENDER

MEMORANDUM

This pro se complaint was filed by Crystal Dixon (“Dixon”), on behalf of herself and Joshua Sweeney, Linda Ann Bey, India Sweeney, and Joy Dixon, four minors, for violation of a liberty interest in a familial relationship under 42 U.S.C. § 1983.¹ The complaint provides a somewhat rambling discourse and history of Dixon’s problems related to the care and custody of her four children. Some 50 defendants—including court-appointed attorneys, social workers, case workers, nurse practitioners, hospitals, private attorneys, physicians, family institutes, MENTOR staff, psychologists, counseling centers, state court services, neurologists, judges, masters, attorney grievance commission, and state agencies—are named.

The matter seemingly arises out of a Maryland Children in Need of Assistance (“CINA”) case which involved allegations of physical abuse, negligence, and parental fitness, originating in 1996. Ms. Dixon asserts that allegations of abuse and neglect made against her by physicians, child care providers, and government agencies (Child Protective Services (CPS) and Baltimore City Department of Social Services (BCDSS) were false. The complaint further involves claims of fraud and irregularity related made by CPS and BCDSS² and the administrative and judicial process associated with removal of children, the visitation restrictions, and the termination of Dixon’s parental rights as to the minors³. The action also references Dixon’s arrest on unspecified charges and “ineffective” representation by the Office of the Public Defender.

As relief, the plaintiffs request compensatory damages for the “permanent damages and scars: caused by BCDS and CPS in separating Dixon from her children. In addition, plaintiffs seek a court order to compel CPS to return all 3 children to their biological mother and that the “foster parents involved in case be eliminated”. Further,

¹ A conclusory claim of discrimination is raised, along with charges of character assassination and slander.

² It is not entirely clear, but these stipulations may have related to the requirement that plaintiff attend parenting classes, have psychological evaluations, and that she only be afforded limited supervised visits with the children.

³ Apparently, proceedings related to the termination of parental rights (“TPR”) occurred before Baltimore City Circuit Court Judge Martin P. Welch. It is not clear whether Dixon’s parental rights have been formally terminated. According to the complaint, at least three of children were or are in foster care.

the complaint seemingly requests that a TPR not be issued for adoption and that the adoption “must be reversed” and appealed before a jury trial.

Preliminarily, the undersigned observes that there are technical deficiencies associated with the complaint. First, no filing fee or indigency application accompanied the complaint. Second, and more importantly, Dixon seeks to file the complaint on behalf of the minor children-Joshua, Linda, India, and Joy.⁴ This she may not do so. Federal courts uniformly do not allow parents, guardian or next friends to appear pro se on behalf on a minor or incompetent person. *Wenger v. Canastota Central School District*, 146 F.3d. 123, 124 (2d Cir. 1998), cert. denied, 526 U.S. 1025 (1999); *Devine v. Indian River School Board*, 121 F. 3d. 576, 581-82 (11 th Cir. 1997), cert. denied, 522 U.S. 1110 (1998); *Johns v. County of San Diego*, 114 F. 3d. 874, 876 (9th Cir. 1997); *Meeker v. Kercher*, 782 F. 2d. 153, 154 (10th Cir. 1986). This prohibition is designed to protect the interests of the minor or incompetent person from being compromised by one who lacks the legal training necessary to adequately protect them. It also recognizes that lay persons are not bound by the same ethical obligations placed upon lawyers. *Brown v. Ortho Diagnostic Systems, Inc.*, 868 F. Supp. 168, 172 (E.D. Va. 1994) For these reasons, the complaint presented on behalf of plaintiffs Joshua Sweeney, Linda Ann Bey, India Sweeney, and Joy Dixon shall be dismissed.

Crystal Dixon, who is obviously the driving force behind this complaint, alleges that her children should not have been removed from her custody, placed in foster care, and the subject to TPR and adoption proceedings. These TPR and adoption proceedings no doubt involved the review of state court masters and judges. Consequently, these claims are clearly barred by the Rooker-Feldman doctrine⁵. Furthermore, I recognize that the state interests in family law matters outweigh the “collateral” federal interests in the adjudication of any alleged federal constitutional rights. See *Anderson v. Colorado*, 793 F. 2d 262, 263 (10th Cir. 1986) (district court lacks subject matter jurisdiction over \$1983 action challenging custody determination by state court); see also *Sylvander v. New England Home for Little Wanderers*, 584 F. 2d. 1103 (1st Cir. 1978)⁶. Therefore, this Court shall not take jurisdiction over the claims. To the extent that Dixon may be seeking injunctive relief pertaining to pending TPR and adoption proceedings, this court shall abstain from review over such a matter. See *Younger v. Harris*, 401, U.S. 37 (1971)⁷.

⁴ According to the complaint, the four children range in age from one to twelve years old.

⁵ *Rooker v Fidelity Turst Co.*, 263 U.S. 413, 415-16 (1923)(only United States Supreme Court has appellate jurisdiction over state court decisions); *District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462, 482 (1983) (“ a United States District Court has no authority to review final judgements of a state court in judicial proceedings”).

⁶ *Sylvander* recognized that(1) there is a long history of state predominance and federal deferral in family law matters; (2) it is unclear whether the welfare of children and families would be promoted by creating a right to litigate in two sets of courts instead of one, thus extending the potential duration of litigation in this area; and (3) cumbersome litigation expenses would no doubt impact on the ability and willingness of social workers and charitable organizations to seek placements for children over their parents’ objections.

⁷ The Supreme Court’s decision in *Younger* “counsels federal court abstention when there is a pending state proceeding” and “reflects a strong policy against federal intervention in state judicial processes in the absence of great immediate irreparable injury to the federal plaintiff.” *Moore v. Sims*, 442 U.S. 415, 423 (1979). Although the *Younger* abstention doctrine requires a federal court to abstain from enjoining a pending state criminal proceeding, it has been extended to civil proceedings as well. *Pennzoil Co. v Texaco, Inc.* 481 U.S. 1, 11 (1987). Abstention in civil cases is generally appropriate in matters of family relations.

For the reasons stated above, the complaint shall be dismissed in its entirety⁸. A separate Order follows.

Date: March 18, 2004

Andre M. Davis United States District Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CRYSTAL YVONNE SWEENEY DIXON
JOSHUA AARON SWEENEY
LINDA ANN BEY
INDIA YVONNE SWEENEY
JOY ELIZABETH DIXON

V.

OFFICE OF THE PUBLIC DEFENDER
CAN, ET AL

CIVIL ACTION NO. AMD-04-675

ORDER

In accordance with the foregoing Memorandum, IT IS this 18th day of March 2004 hereby ORDERED that:

1. This 42 U.S.C. § 19983 civil rights complaint is dismissed without prejudice;
2. The Clerk of the Court CLOSE this case: and
3. The Clerk of the Court shall MAIL a copy of this Order, together with the foregoing Memorandum, to plaintiff Crystal Dixon.

Andre M. Davis United States District Judge

Moore, 442 U.S. at 435.

⁸ Dixon's claim of defamation is not colorable under §1983. Injury to reputation alone does not result in a deprivation of a liberty or a property interest protected by the Due Process Clause of the Fourteenth Amendment. Paul v. Davis, 424 U.S. 693, 703 (1976); see also Siegert v. Gilley, 500 U. S. 226, 233 (1991): An action for damages to reputation "lies.... In the tort of defamation, not in 42 U.S.C. § 1983" Fleming v. Dept of Public Safety, 837 F. 2d. 401, 409 (9th Cir.), cert. denied, 488 U.S. 889 (1988).

