

K.A., Amador Co, CA

34. K.A. was a single mother with physical custody of three sons from a first marriage when she married D.H. in June 1985. D.H. and K.A. had three children during the marriage – a son, J.H., and 2 daughters, K.H. and S.H..
35. She separated from D.H. in August 1993, due to his abuse of the children and her. The three older sons from a previous marriage were verbally, emotionally, and psychologically abused by D.H.. For the most part, his physical abuse of them was mild (yanking them by the arm etc.) but he viciously attacked the older son on one occasion, and the younger son and mother had to struggle to pull him off. He often threatened all of them with physical abuse. She filed for divorce in Amador County, CA in May 1994. They were divorced in 1995. She was always the primary caregiver of the children and had primary physical custody of the children after the separation and divorce.
36. Susan Harlan, acting as presiding judge, took jurisdiction of the case between 1 January 1993 and 1 January 1999. In the fall of 1994, the two daughters began disclosing to the mother and a family friend and babysitter that their father was engaging in sexually inappropriate behavior with them on court ordered visits. He was sleeping and showering with them against their will, walking around in tiny underwear, with his genitals showing through. The younger child, S.H., complained that the father would sleep with her and she would wake up without her panties on. The children manifested behavioral signs consistent with children who have been molested such as acting out sexually with each other and other children and demonstrating sexual activity with dolls.
37. On or about July 25, 1995, UC Davis Medical Center filed a suspected child sexual abuse report to Amador County Child Protective Services, after discovery by a pediatrician of a damaged hymen in K.H., age 6. The Medical Center requested authorization to do a sexual assault examination at its Child Protection Unit, to determine the cause and extent of K.H.'s genital injuries. CPS director Matt Zanze refused to authorize the exam.
38. On October 13, 1995, Judge Harlan appointed psychologist Larry Leatham to act as a custody evaluator and appointed attorney Larry Dixon to represent the children in the family law matter. The mother was court ordered to participate in a custody evaluation, conducted by Leatham. Leatham wrote and filed an evaluation report with the court on December 11, 1995, in which he disregarded D.H.'s history of family violence, to which D.H. had admitted. Leatham disregarded warnings by the children's therapists that the children were at risk of abuse in unsupervised contact with D.H.. Instead, he recommended 50/50 joint physical and legal custody.
39. On January 19, 1996, K.H. (age 7) disclosed to her therapist that someone was abusing her. On or about January 24, 1996, the Amador County Sheriff's Office ("ACSO") initiated a criminal investigation for sexual abuse of K.H. and S.H. (age 4),

after both girls were examined by UC Davis Medical Center, Child Protection Unit, in July 1995 with a finding of genital injuries in K.H.. (See paragraph 37 above)

40. During the law enforcement investigation, K.H. and S.H. made direct disclosures of molestation by D.H.. They described acts of vaginal penetration, sodomy, oral copulation, and being shown child pornography. Their disclosures were substantiated by ACSO, supported by medical evidence of penetration, psychological evidence of trauma, statements made to collateral sources, and the report of the 12-year-old daughter of a family friend who observed D.H. molesting K.H. when he had stayed overnight at her home to baby-sit.
41. On January 30, 1996, ACSO conducted a pretext phone call to D.H., alerting him to the allegations of sexual abuse made against him by the daughters. On January 31, 1996, ACSO interviewed D.H., who did not admit or deny the allegations of molestation. When asked by the ACSO detective if his children's sexual abuser should be punished, D.H. couldn't decide. During the ACSO interview D.H. admitted to calling Leatham the evening before, following the pretext phone call, to ask for Leatham's help in defending against the sexual abuse allegations.
42. Thereafter, on or about February 1, 1996, Leatham went to the office of Helen O. Page, county paid Family Law Facilitator and friend, and solicited Page to represent D.H. as a private client. An independent witness later reported this meeting and the planning to ensure that custody went to the father. On February 8, 1996, Page substituted into the case as D.H.'s attorney.
43. On February 28, 1996, by a phone call, Harlan transferred the case to an out of county judge from Alpine County, Harold Bradford. Bradford failed to disclose a conflict of interest in presiding over the case resulting from a close prior employer/employee relationship between himself and Page.
44. On March 6, 1996, Leatham fraudulently represented himself as an "expert" in child sexual abuse to give testimony to the family court regarding the children's allegations of molest. Leatham refused to review the evidence of sexual abuse, and then gave incompetent forensic testimony to the court by "diagnosing" the children and mother with a non-existent disorder, "parental alienation syndrome," (PAS) a hypothesis in which it is assumed that children who disclose paternal sexual abuse are lying at the instigation of vindictive mothers.
45. Using PAS, Leatham, who had recommended joint custody prior to the children disclosing sexual abuse, then recommended sole custody to D.H. in spite of the fact that D.H. was under active criminal investigation for child sexual abuse. Subsequent to Leatham's March 1996 testimony, the mother complained about his incompetence to her attorney, victim advocate, child protection agencies and members of the public. In retaliation, Leatham slandered and defamed the mother in the legal and mental health communities in the county.
46. On or about March 20, 1996, CPS director, Matt Zanze conducted a token investigation of the molestation. Zanze did not interview the mother, the victims or the collateral witnesses to whom the children disclosed molest. When she informed Zanze that there was a witness who observed D.H. molest K.H., Zanze stated, "I'm

not going to go hunting for witnesses.” Zanze accepted documents from D.H. but refused to accept documents from mother. Zanze used Leatham’s fraudulent representations as an “expert” in child sexual abuse to include recommendations. While failing to conduct a proper investigation of the sexual abuse, Zanze made a finding that he “couldn’t tell what happened.” Even with this dilatory investigation, Zanze refuted Leatham’s PAS “diagnosis,” and recommended custody to mother, with unsupervised visitation to D.H..

47. Zanze stated to the mother, in the presence of her attorney, that he was being politically “pressured” to go along with the custody switch. In Leatham’s September 1, 2004 deposition, in a collateral civil lawsuit brought by the mother, he identified Zanze as a “friend” and admitted to having *ex parte* communications about the case with him. After the mother criticized his incompetent “investigation” report, Zanze engaged in a pattern of hostile and retaliatory conduct.
48. On or about March 21 –28, 1996, former Amador County District Attorney, Steve Client conducted a Grand Jury proceeding to determine if D.H. should be prosecuted. He failed to subpoena critical collaborative witnesses who would support the children’s disclosures of sexual abuse by D.H., including the children’s brother who was aware of his father’s clandestine night time visits to his sister’s bedroom and who saw his father in bed with his sisters, collateral witnesses to whom the children disclosed sexual abuse, and the eye witness to molest of K.H. by D.H..
49. On April 11, 1996, the mother was forced by court order to submit to a psychological evaluation by a psychologist appointed by the court, Richard Deatherage, even though she had no history of mental health problems. This evaluation resulted in a finding that she was mentally, emotionally, and psychologically healthy (“the profile of a rather normal individual”), and that she was “unlikely to make false allegations of abuse.” These findings were disregarded. D.H. had a psychological evaluation and his raw data was withheld because it was too incriminating.
50. On June 5, 1996, the children sought to terminate Larry Dixon as their court appointed attorney because he refused to believe their allegations of abuse.
51. On August 14, 1996, Bradford conducted a hearing without a court reporter present, in which he ridiculed and threatened the mother’s attorney, the children and the mother. Zanze was present and made inappropriate sexual remarks against the mother that were taped. When the tape was turned over to the grand jury in 1997 with a complaint against Zanze, he was disciplined for unprofessional conduct that only increased his hostility toward mother.
52. On August 16, 1996, Dixon filed a motion to suppress all evidence of sexual abuse and any other form of family violence perpetrated by D.H. claiming it was for procedural reasons. Dixon suppressed this evidence after he admitted on the court record in March 1996 that there was medical evidence of sexual abuse and penetration of K.H.. In a court pleading in 2002, Dixon admitted he had asked the K.H., who said she had been molested. While Dixon claimed that the father was not the perpetrator, he took no steps to locate any other perpetrator.

53. On September 24 – 26, 1996, Bradford conducted the custody trial. The mother had to obtain new counsel due to the sudden illness of her previous counsel but the court refused a motion for continuance. At the custody trial, Bradford ordered all evidence of D.H.'s sexual abuse of the children and his history of family violence to be suppressed. Bradford refused to allow anyone to testify except Leatham, who again, gave testimony regarding PAS and the children's allegations of molestation, while fraudulently representing himself as an "expert" in child sexual abuse. Again Leatham recommended custody to D.H., while he remained under criminal investigation for sex abuse, and while the children were identified by the State of California, as victims of sex crimes perpetrated against them by their father.
54. The mother was barred from testifying at her own custody trial except regarding her answers to interrogatories. She was prohibited from presenting evidence or witnesses regarding the abuse of the children or the best interests of the children. The judge granted the child's attorneys motion to exclude all evidence of sexual abuse or any abuse by the father as a sanction against the mother. But the judge went beyond that order and even disallowed evidence of best interest.
55. Custody was switched to D.H., based on Leatham's fraudulent testimony to PAS, even though Leatham had never conducted a child abuse assessment and he had never reviewed the law enforcement, medical, and psychological evidence of abuse of the children. Leatham's recommendations refuted findings in his own December 1995 custody evaluation report, wherein, by the admissions of the children's father, the mother was a good mother and the parent to whom the children were most bonded.
56. The mother was stripped of custody and ordered to have no contact with the children. The mother was quite upset, protested the ruling and refused to divulge the location of the children. She was arrested and transported to Amador Hospital, where a County Dept. of Mental Health employee, Frank Whitman recommended a 72 hour mental health hold at a psychiatric facility. However, mother was released from the psychiatric facility as soon as she saw a psychiatrist because he found that the order for a 72 hour hold was unlawful because "patient does not fit the criteria for a 72 hour hold." The trial was then continued until 31 October 1996.
57. On or about October 31, 1996 at what was supposed to be the continuation of the trial, Bradford stated to the mother, "You already had your trial" and refused to hear testimony on the best interests of the children. He accused witnesses of being on a witch hunt and threatened the attorney and mother with sanctions for repeating allegations of sexual abuse.
58. On November 1, 1996, Bradford appointed a therapist, Marsha Nohl, privately hired by D.H., to "treat" the children for the false PAS diagnosis made by Leatham. Without meeting or speaking to the children or mother, Nohl prepared a treatment plan for treating PAS – a diagnosis which does not exist. The mother refused to meet with Nohl and complained about the validity of a therapist diagnosing someone without ever having met them.

59. On November 26, 1996, mother filed an appeal of the order transferring custody to D.H.. On the same day Dixon filed an *ex parte* Order to Show Cause to terminate telephone contact between the children and mother. On November 27, 1996, Bradford and Amador Superior Court clerk Janet Davis, altered the court file prior to sending it to the appellate court. This was first reported by an insider and then 2-3 years later while reviewing the file, the mother found a memo written by Davis stating the judge had called her and told her to list some political materials as trial exhibits and send to the appeal court with the record on appeal. The mother kept a copy of the memo.
60. On January 31, 1997, Bradford's Order to Show Cause for sanctions against mother's attorneys and mother was heard. Bradford was forced to abandon his threat of sanctions after counsel for the attorneys presented evidence that the judge had previously refused to hear at the custody trial that supported the children's allegations of sexual abuse and the good faith conduct of the attorneys and mother. On the same day, an Order to Show Cause and Affidavit for Contempt was filed against mother for providing Child Protective Services with information regarding the abuse.
61. On or about February 13, 1997, Nohl threatened the mother to sign a contract to use her separate business (A.F.T.E.R.) for visits with the children, stating that she would induce the court to prohibit contact between the children and mother if mother didn't sign the contract. Mother was forced to pay Nohl in cash to see her children. Mother was restricted to supervised visitation for two years. Nohl instructed the mother not to tell the children she loved or missed them, not to demonstrate affection for them, and not to speak to them about their feelings, their activities, or how they were coping with the changes in their lives. Failure to comply by the children or mother would result in Nohl asking the court to prohibit contact completely.
62. On April 25, 1997, Bradford put a publication that he obtained *ex parte* into the case file supporting the myth that women routinely make false allegations of sexual abuse. Bradford also closed the proceedings to the public. Bradford took this action after community members who observed the hearings wrote letters to the editor of the local newspaper alleging that the court was acting corruptly to purposefully cover up the sex crimes of an offender and retaliate against the complaining witnesses.
63. On or about May 5, 1997, K.H. made new allegations of sexual abuse by D.H. to classmates at school. The therapist, Nohl, insisted that K.H. write a letter denying this later as witnessed by the older boy, Jeff, who reported it when he left the father's home.
64. On May 13, 1997, mother was forced to file bankruptcy.
65. On or about January 15, 1998, mother filed a civil rights lawsuit against Amador Superior Court, Judges Harlan and Bradford, D.H., Dixon, Page, Leatham, Nohl, and Zanze and the County of Amador among others.

66. On January 22, 1998, on the advice of an investigator for the Board of Behavioral Sciences, mother filed an *ex parte* motion to terminate Nohl as the children's therapist, citing her right to do so as joint legal guardian of the children, and to increase visitation with the children. The court then began the process of removing her joint legal custody so she would not be able to have any influence on the children's treatment.
67. On or about January 26, 1998, Bradford was served as a defendant in the civil rights lawsuit.
On February 20, 1998, mother was ordered by Bradford to dismiss the lawsuit and "apologize to the community." Bradford ordered unsupervised visitation but told community members present in the courtroom that the mother's ability to have contact with her children was dependent on their willingness to restrict their free speech right to talk about the case.
68. On March 12, 1998, Dixon filed a motion to force mother back to supervised visitation, for the reason that lawful service of a lawsuit on the father had harmed the children's interests. On March 18, 1998, Bradford was removed from the case on a challenge for cause for bias filed by mother. On May 13, 1998, visiting judge James Accurso granted Dixon's motion for a return to supervised visitation and to remove joint legal custody. Nohl withdrew from the case.
69. Thereafter, the children and mother had supervised visitation in Amador County with volunteer supervisors. D.H. repeatedly violated court orders and harassed and threatened visitation supervisors, causing them to be in fear and withdraw their services so that the children suffered repeated, sudden losses of contact with mother. D.H. and Dixon would then refuse to agree to another supervisor, causing mother to have to file court actions to obtain a new supervisor, with long periods of no contact between withdrawal of a supervisor and a court hearing to appoint a new one. The children's unpredictable losses of contact had an extremely negative impact on the children's bond and sense of security with their mother. In January 1999, Accurso ordered mother into counseling "other than by a Victims of Crime therapist" to cause her to "change her views".
70. On January 1, 2000, California Family Code §3027.5 was enacted to protect child victims of sexual abuse and the custody rights of their non-offending parents in family court litigation. The new law was created partially from this family law case that was used as an example of the malfeasance of family courts in adjudicating allegations of child sexual abuse.
71. On January 13, 2000, Accurso was removed from the case on a peremptory challenge by grandmother intervener. On March 23, 2000 visiting Judge Frank Grande presided over mother's Motion for Modification of Custody, based on the new law created from the facts of her case. In spite of the new law, the judge denied the motion.

72. On March 23, 2000, Leatham, the evaluator, pled no contest to charges of gross negligence filed against him by the Attorney General, on behalf of the Board of Psychology, for performing incompetent evaluation services and giving incompetent testimony to the court in this case. On May 15, 2000, an investigative reporter, Karen Winner, released her study, *Placing Children at Risk: Questionable Psychologists and Therapists in the Sacramento Family Court and Surrounding Counties*. In it, she specifically investigated Larry Leatham and Marsha Nohl as well as other cases and therapists and found that there were repeated violations of law, ethics and common sense.
73. On August 11, 2000, the State Victims Compensation and Government Claims Board concluded a new investigation of the sexual abuse of the children and made a finding that there was at least a preponderance of evidence that the children were molested by D.H.. Despite this finding, the court refused to return custody to mother in a hearing In January 2001.
74. On August 25, 2000 Grande was removed from the case on mother's challenge for cause for engaging in *ex parte* communications. On January 10, 2001, a new Judge, Robert Martin, ruled that supervised visitation was not appropriate and ordered alternate weekend and mid week visitation to mother. The court sealed all pleadings that revealed that Dixon, the child's court appointed attorney, had been accused by his wife of inappropriate conduct with an unrelated 11-year-old girl.
75. On May 2, 2001, Martin held an informal hearing because of the joint efforts of D.H. and Dixon to frustrate mother's visitation. Martin reprimanded Dixon reminding him that he was not representing the father and ordered Dixon to refrain from interfering.
76. On December 31, 2001, mother filed a motion for a change of venue and counseling for the children and mother together because of the history of trauma and the children's depression, to be provided through the benefits authorized by the Victims of Crime program. The motion was supported by the Amador County District Attorney and by the Attorney General.
77. On January 10, 2002, mother's motion for a change of venue was denied and her motion for counseling was continued, pending an evaluation of the children's "Best Interests." Dixon urged the court to re-appoint Nohl for the specific purpose of assessing the children's mental health status and need for counseling. Nohl wrote a letter to court assessing the children's mental state and blocking therapy though she had not seen the children for three years.
78. On April 17, 2002, mother was ordered to participate in a custody evaluation conducted by Family Court Services director, Diane Goodman. Goodman refused to sign the required declaration of qualifications required by the Family Code and California Rules of Court, and therefore, was not qualified to perform an evaluation. Goodman was Leatham's supervisor.

79. On July 5, 2002, Goodman refused to consider D.H.'s history of sexual and psychological abuse of the children. Goodman declared that all three children "presented as depressed" but that they should not have therapy. On August 14, 2002, Judge Martin adopted the recommendation. Martin was subsequently removed from the case because of medical physical disabilities.
80. On or about April 19, 2003, the parties' son, Jeff, wrote a letter to Dixon disclosing D.H.'s abuse of him and requested that Dixon file a motion to place him in mother's custody for his safety. Dixon refused to file the motion on behalf of Jeff. On April 22, 2003, mother filed a motion for Modification of Custody based on J.H.'s new disclosures of years of emotional abuse of all the children by D.H. and D.H.'s continued efforts to frustrate mother's visitation and relationship with the children. On May 7, 2003, J.H.'s letter was sealed and mother's motion for modification denied.
81. On or about May 30, 2003, Jeff, then 17, escaped from his father and returned to mother's sole physical custody. Once free from the custody and control of his father, J.H. disclosed that he was present and witnessed collusion between his father and court officials to rig the case in favor of D.H.. J.H. also revealed that he had knowledge that his father continued to visit his sisters' bedrooms in the night after obtaining custody, and that he and his sisters were terrorized by his father, Nohl, and Dixon, to be silent about his father's abuse.
82. On September 4, 2003, the California State Commission on Judicial Performance substantiated mother's complaints that Judge Bradford acted in a biased and unlawful manner in this case and he was disciplined by the Commission for his unlawful conduct but he only received a private reprisal.
83. On April 1, 2004, mother filed an *ex parte* request for sole legal custody of J.H. because D.H. was using legal custody to block J.H. from obtaining needed oral surgery for impacted wisdom teeth. On April 6, 2004 mother obtained legal custody of J.H. from a visiting judge and J.H.'s oral surgery, scheduled for that afternoon, was ordered to go forward. However, by that time, D.H. had removed J.H. from his medical insurance policy so there was no means of paying for the oral surgery, and therefore, it could not be done.
84. On April 6, 2004, mother filed a Motion for Modification of Custody. In violation of court orders, D.H. refused to participate in mediation but was not held accountable. On July 7, 2004, Judge Ritchey granted Dixon a protective order against Jeff, to prevent Dixon from having to release to J.H. his client file. On July 28, 2004 mother was ordered to participate in a custody evaluation conducted by Barbara Liberty-Vick, MFT.
85. On February 22 – 24, 2005, Judge Ritchey refused to allow mother to have a court reporter for a custody trial with evidence and witnesses. All witness testimony, including the testimony of experts, supported mother's position. Vick testified that

prior to being appointed to the case, she had been influenced by “other court officials” through *ex parte* communications, to adopt D.H.’s position in the case. Vick testified that the undue influence led her to draw incorrect conclusions about the children’s welfare. Vick testified that she came to discover that the children were molested by their father. D.H. refused to take the witness stand and invoked the 5th Amendment right against self incrimination when asked if he molested his daughters. J.H. testified about D.H.’s abuse of him and his sisters, and about his father’s aggressive efforts to turn him and his sisters against the mother.

86. On March 17, 2005, Ritchey falsified the testimony to deny the mother custody. J.H. later filed an affidavit about his actual testimony and how it was mischaracterized by the court.
87. Because father continued to violate the court orders, mother filed for contempt. A hearing was set for 26 August 2005 but continued.
88. On August 17, 2005, Vick concluded a thorough investigation of the entire case and submitted a report to the court for the August 26, 2005 review hearing. Vick’s report substantiated sexual and psychological abuse of the children by D.H. and continued violations of court orders and frustration of mother’s parenting time by D.H. since the orders made on March 17, 2005. Vick urged the court to transfer the children to mother’s sole custody for their safety and well being.
89. On August 26, 2005, Ritchey refused to accept Vick’s report and refused to consider new evidence that warranted an increase in parenting time for mother. Instead, he gave D.H. even more custody and control over the children. Between July 2005 and January 2006, Ritchey failed to set a trial date for multiple Orders to Show Cause citing D.H.’s repeated instances of contempt of custody orders.
90. On September 12, 2005, mother filed a Motion for Modification of Custody based on Vick’s report substantiating abuse of the children by D.H., his continued violations of court orders and efforts to sabotage mother’s parental role. Ritchey refused to set a trial date.
91. On October 7, 2005, a stipulated order was made for the children to have weekly therapy with mother to re-build their relationship that was being destroyed by D.H.. D.H. violated the order each week, causing law enforcement to send reports to the District Attorney for prosecution. Ritchey refused to set a trial date for the contempt against father and for mother’s Motion for Modification.
92. On October 13, 2005, the first evaluator, Leatham, was fined \$75,000.00 by the Board of Psychology in further administrative actions filed by the Attorney General, and his license to practice psychology was revoked for illegal and retaliatory conduct perpetrated against mother in this case (gross negligence, abuse of power, violation of confidentiality) and for performing a grossly negligent fitness for duty evaluation of another woman in an unrelated case.

93. On January 5, 2006, the then Amador County District Attorney filed criminal charges against D.H. for multiple violations of custody orders. On January 24, 2006, D.H. and daughter S.H. were arrested for violations of the court order.
94. On January 27, 2006, visiting judge Jane York conducted an *ex parte* hearing based on procedurally defective papers submitted by D.H., requesting termination of mother's parenting time and therapy for the children. Prior to conducting the hearing, York had *ex parte* communications about the case with local court officials. Prior to commencement of the hearing, York instructed the court reporter to not report the hearing. York temporarily suspended mother's parenting time for "parental conflict" caused by D.H.'s and S.H.'s violations of the court orders, and changed the terms of the stipulated order for therapy at D.H.'s request and over mother's objections. York ordered the children to continue in therapy but with D.H. delivering them.
95. On January 30, 2006, two hours after mother complained at the court clerk's office about the January 27, 2006 *ex parte* hearing, York and court supervisor Janet Davis altered and falsified D.H.'s moving papers, then removed and secreted the falsified documents from the court file. Mother has copies of the original OSC submitted and the falsified one after conversion with fax tracking information on the falsified pages.
96. On February 17, 2006 Ritchey over mother's objection, without service of the pleading, and in violation of California law that requires mediation prior to hearing an OSC for custody/visitation, ordered continued suspension of mother's parenting time and ordered suspension of therapy for the children. The tape recording of the February 17, 2005 hearing was made "unusable."
97. On April 3, 2006, mother filed a writ for emergency relief from the temporary orders and due process violations to the California Court of Appeals, Third District, which was denied.
98. On April 12, 2006, Ritchey conducted another hearing over mother's objection and appointed a different attorney for the minor's (Brian Chavez-Ochoa). Ritchey refused to set a trial date for mother's Motion for Modification.
99. On April 19 –20, 2006 Ritchey conducted an evidentiary hearing over mother's objection. Ritchey refused to allow the son J.H. to testify, who was a necessary and critical witness. Ritchey conducted an *ex parte* interview with daughter S.H. over mother's objection. Ritchey refused to allow mother a transcript of the *ex parte* interview. All witness testimony favored mother's position in the case. D.H. admitted violating court orders and supporting S.H. in doing so.
100. On May 3, 2006 Mother filed another writ for emergency relief from the temporary orders and due process violations to the California Court of Appeals, Third District, which was determined to be moot because of final orders made before the appellate court addressed the writ.

101. On May 5, 2006, Ritchey conducted another hearing over mother's objection and finally set an August 28, 2006 trial date for her Motion for Modification.
102. On May 19, 2006, Ritchey made a ruling based on the April 19th hearing that permanently terminated orders providing mother with parenting time and vacated a stipulated order for therapy for the children. Ritchey gave D.H. sole custody and control of the children, while 24 citations of contempt and criminal charges were pending against D.H. for violating custody orders.
103. On July 13, 2006, mother filed a Notice of Appeal to the California Court of Appeals, Third District, *K.A. v. Amador Superior Court* CO53231. On July 18, 2006, mother filed a writ for emergency relief to the California Court of Appeals, Third District, to stay the May 19, 2006 orders. The writ was denied.
104. On July 28, 2006, the first evaluator, Leatham, testified before a jury in the civil jury trial brought by mother for slander that Judge Susan Harlan, while acting as presiding court judge of the Amador Superior Court, repeatedly offered legal advice to him while the case was pending, and repeatedly solicited Leatham to file a motion to declare mother a vexatious litigant. Leatham filed the motion in the civil case at Harlan's urging, but it was denied for lack of merit by the judge who conducted the jury trial.
105. On or about July 28, 2006, during the civil jury trial, mother also discovered that on January 19, 1999, Judge Susan Harlan, acting as presiding judge of the Amador Superior Court, interfered in the Medical Board administrative complaint against Leatham by writing an unsolicited letter to the Medical Board Investigator.
106. On August 1, 2006, Leatham testified before a jury in the civil trial of *K.A. v. Leatham*, that he gave testimony before a Grand Jury on or about March 20, 1996, and to the Amador Superior Court in mother's custody trial on September 26, 1996, regarding the validity of the children's allegations that their father sexually abused them. He represented himself as an "expert" in child sexual abuse when he gave testimony to the Grand Jury and family court while he knew at the time, that he had no expertise in child sexual abuse. He declared to the Grand Jury and the family court that the children made "false allegations" of sexual abuse and that they were not sexually abused by their father, while he knew at the time that he had no way of knowing with any certainty whether or not the children were sexually abused by their father. He further testified that when he gave testimony to the Grand Jury and the family court diagnosing the children and mother with "parental alienation syndrome," (PAS) he knew at the time that PAS was not a validated diagnosis or mental health disorder.
107. On or about September 28, 2006, mother filed a Verified Statement of Disqualification against Ritchey, challenging him for the cause of bias, mental incapacity, and his accessory to the crime of conspiracy and falsifying court documents. He was not removed from the case.

108. On December 7, 2006 Ritchey, in complete violation of all procedure, said he was filing a motion from the bench to dismiss mother's Motion for Modification. That so called motion is now scheduled to be heard May 15, 2007.
109. A trial on D.H.'s citations for contempt of court orders was scheduled for March 1 - 2, 2007. No charges were filed against the daughter. The criminal case against the father has been continued by the prosecutor until the family court judge rules in the civil contempt case. Given the history of Ritchey's rulings, mother fully expects that the family court judge will not find the father in contempt and then the father will use that to have the criminal charges dismissed.
110. On February 13, 2007 mother filed a new Verified Statement of Disqualification against Ritchey for bias demonstrated at the 7 December 2006 hearing. The judge who reviewed the disqualification motion found nothing wrong with a judge filing motions against a party from the bench.
111. On 5 March 2007, the mother went to the daughter S.H.'s school to fill out an emergency card with her new address and phone number, and to request a "second mailing," so that she would receive all the same school notices the father receives. She also requested a copy of S.H.'s report cards since the father refuses them in violation of court orders. The school refused to give mother any information claiming the file had been "red flagged". Only after intervention by an attorney was she able to get the records and be included as a recipient of the child's records.
112. On 12 March 2007, mother filed a rebuttal in the Disqualification case that is pending against Ritchey arguing that the issue is not the rulings of the judge, but the bias and prejudice, the violation of due process, *ex parte* hearings, falsification of records and evidence, destruction of evidence, fraud, misstatement of facts, and refusal to record the proceedings either by court reporter or tape recorder. A review judge denied the disqualification. The Amador Superior Court's history of unlawful conduct, gender bias, and retaliation against complaining victims of abuse is documented in a lawsuit filed by the former CEO of the Amador Superior Court, *Rachelle Agatha v. Amador Superior Court*, 05CV03942.
113. The son Jeff, age 20, who now lives in San Diego, California, still suffers from the effects of being forced to live in an abusive environment for years. He is grieving over the loss of a relationship with his sisters, who were forced by their father to cut ties with him. J.H.is also a petitioner in this action.
114. The daughter K.H. left her father's house at age 17 and moved to another city. She is now 18. The years of abuse and trauma have left her depressed, unable to trust, and emotionally shutdown, so that she cannot form close relationships. The father has successfully poisoned the bond between the mother and daughter so that the relationship is severely damaged. The mother maintains contact hoping that one day they can reconcile.

115. The daughter S.H., almost 16, has been completely isolated from the mother and the rest of her maternal family for over one year. She is so consumed with negativity and rage that she sometimes expresses it with violence. Although she is extremely intelligent, she is failing in school.
116. The lives of the children and mother have been irreparably harmed by the family court. Instead of protecting victims of abuse, the court protected the offender and the court itself became an arm of the offender, perpetrating legal abuse on the children and mother. The children have suffered years of abuse at the hands of their father and the court. The years of trauma and psychological abuse have left them with lasting emotional damage. They suffer from abandonment and loss issues, low self esteem, anger, rage, depression, and sleep disturbances. They have lost the ability to trust. Their childhoods were stolen from them because of the conduct of the court.
117. The mother has been prevented by the court from protecting her children. She has been treated by the court as if she were not even human. She has been demeaned, ridiculed, and slandered by court officials in the courtroom and in the public through *ex parte* communications. She has been diagnosed with Post Traumatic Stress Disorder resulting from the abuse of her children by their father and the legal/psychological abuse perpetrated on her by the court.
118. The entire maternal family has suffered immeasurable trauma, loss, and grief from being separated from the children. The children's sibling relationships have been seriously damaged and destroyed by the conduct of the court.
119. The mother has been financially and emotionally raped by the Amador Superior Court by unconstitutional gender bias and retaliation for challenging the court's competence and ethics, and for daring to fight to protect her children. Court officials improperly influenced other county official's agencies through *ex parte* communications and nepotism, including the Dept. of Social Services, Child Protective Services, the Office of County Counsel, and the Dept. of Mental Health, to participate in what the mother terms "emotional gang rape." The mother alleges that the court has committed a hate crime against her because of characteristics associated with gender - a woman's natural maternal instinct to fight to protect her children from harm and to remain an active participant in her children's lives, i.e., to mother her children.