

1
2
3 **Introduction**

4 Under IDAHO Rules of Family Law Procedure Rule 108, Disqualification for Cause,
5 Section A Grounds, Number 4:

6 "That the judge or magistrate is biased or prejudiced for or against and party or the
7 case in action".
8

9 **History and Concerns**

10 I, Jacqueline Bladow, the Petitioner, and (MOTHER) of D.B. MOTHER no CONTACT
11 with D.B for 20 months. Respondent is the father of D.B (FATHER). D.B. is 14
12 years old. Losing custody of D.B has been like grieving a death, MOTHER is in a
13 constant state of panic, worried for her safety. D.B was seen for suicide. MOTHER
14 was dismissed from her job in April due to a panic. MOTHER was diagnosed with
15 Post Traumatic Stress Disorder in 2012 by Dr. Helman, Salinas California. MOTHER
16 now being treated for increasing night terrors, insomnia, panic attacks, uncontrolled
17 migraines, cyclic vomiting syndrome, increasing anxiety and debilitating depression
18 with Dr. Murphy at St. Luke's Hospital in Twin Fall. He is aware mother is unable to
19 work. Counseling visits are limited due to Covi-19, MOTHER will be unable to start
20 any therapy for a month. DNA test done to find the best medication. Mother is in
21 the process of applying for Permanent Social Security Disability and she is
22 concerned that Judge Harmer will be bias and refused to modify MOTHER'S Child
23 support order. It may take a year or more to receive Social Security benefits.
24
25
26
27
28

1 MOTHER did not have Relationship "issues" to the extreme of deserving of
2 termination of the relationship with D.B. It is not unusual for teenaged girls to
3 rebel against their parents. MOTHER was denied an expert witness to view our
4 mother and daughter bond.

5 MOTHER is requesting re-calculation of child support and is fearful that this
6 recalculation will be denied. JUDGE HARMER has already ordered MOTHER to pay
7 60% of out of pocket medical care of D.B. Such an order is rare, parents almost
8 always equally share out of pocket medical expenses. JUDGE HARMER as ordered a
9 stipulation of MOTHER to have contact with D.B. that cannot be met. This
10 separation has harmed D.B. she was seen for suicidal thoughts.

11 **Facts in Support of Motion to Disqualify JUDGE HARMER:**

12
13
14
15 **I. Letters of Complaints previously filed. Met personally to discuss**
16 **concerns with Shelli Tubbs. (See Exhibit One)**

- 17
18
19 a. November 22, 2019, MOTHER wrote and mailed out many letters of
20 complaints regarding newly hired JUDGE HARMER. These letters were
21 sent to State of IDAHO Judicial Council, David Cantrill, Administrative
22 District Judge, Eric J Wildman, Assistance to the Administrative
23 District Judge, and Shelli Tubbs (TUBBS), plus the Mayor of Twin Fall
24 and Board of Supervisors. This was MOTHER'S SECOND complaint
25 directed at JUDGE HARMER. MOTHER made arrangements to meet
26 with TUBBS personally to discuss MOTHER'S complaints regarding
27

1 JUDGE HARMER. MOTHER'S concerns that he remains MOTHER'S
2 Judge, and MOTHER'S deep concern for the health and welfare of D.B.

3 **Bias: MOTHER will not receive fair treatment from JUDGE HARMER because**
4 **she filed formal complaints against him.**

5
6 b. TUBBS meeting, MOTHER discussed recent change of circumstance in
7 the condition of D.B. Her mental health, being seen in an Emergency
8 Room (ER) for suicidal attempts/thoughts . D.B had become suicidal
9 due the lack of contact with her MOTHER. JUDGE HARMER had
10 ordered Therapeutic Supervised Visitation (TSV) a condition for
11 contact that MOTHER could not meet (see TSV). D.B. became
12 suicidal in the care of FATHER and Melisa OSEN LCSW (OSEN). D.B
13 had NO contact with MOTHER in 10 months, then D.B was seen in the
14 ER for suicidal thoughts, MOTHER filed a motion requesting D.B. be
15 evaluated by a mental health doctor, a child psychologist. FATHER
16 filed a motion, stating that D.B. was deteriorating due to MOTHER
17 harassing phone calls. MOTHER produced her phone records in
18 court, PROVING SHE HAD NO PHONE CONTACT. JUDGE HARMER
19 REFUSED to look at MOTHER's phone records. MOTHER had a difficult
20 time in court maintaining her composure. MOTHER contends that
21 D.B. had been erased from MOTHER life unjustly, now becoming
22 suicidal and JUDGE HARMER refused to take the time to view MOTHER
23 documents that PROVE FATHER is untruthful and MOTHER was NOT
24
25
26
27
28

1 guilty of the behaviors for which she was being accused of by FATHER
2 and OSEN.

3 **Bias: D.B deteriorating, being seen in ER for suicide after 10 months of no**
4 **contact with MOTHER. FATHER motion stating the ER visit of D.B's suicidal**
5 **thoughts were due to MOTHER harassing phone calls were FALSE. MOTHER**
6 **had NO PHONE CONTACT with D.B for many months. JUDGE HARMER**
7 **refused to view MOTHER'S phone records, and denied MOTHER'S formal**
8 **request for regular supervised visitation and/or counseling to help D.B.**
9 **JUDGE HARMER refused MOTHER's formal request to have D.B evaluated by**
10 **a Child Psychologist for a proper diagnosis. MOTHER had a court order that**
11 **allowed her rights to medical decisions and MOTHER is a Registered Nurse**
12 **BSRN.**

13 **Bias: Excepting FATHER's false claim signed under penalty of perjury that**
14 **D.B was suicidal due to MOTHER'S harassing phone calls without proof.**
15 **JUDGE HARMER allowed perjury in the courts, refusing to review MOTHER**
16 **official, true phone call record. JUDGE HARMER accused MOTHER of being**
17 **out of line because she was very upset and concerned for D.B. MOTHER**
18 **was very upset that D.B is suicidal, was denied contact with D.B and that**
19 **D.B was not going to be formally evaluated by a mental health doctor, child**
20 **psychologist. MOTHER was very upset that JUDGE HARMER refused to view**
21 **her phone records to prove FATHER was untruthful. MOTHER had a good**
22 **reason for raising her voice to be heard, the bias treatment in JUDGE**
23 **HARMER's court room put D.B in harm's way. JUDGE HARMER's orders to**

1 **separate D.B from MOTHER had created serious mental health issues, ER**
2 **visit for suicide. Perjury, false motions should NEVER be allowed in court.**

3 c. I personally discussed the concerns of bias (b), with TUBBS, and also,
4 JUDGE HARMER had refused to enforce court orders, properly filed
5 foreign orders from CALIFORNIA. These custody orders also contained
6 a **QDRO** order written by a Judge in CALIFORNIA for **the purpose of**
7 **being enforced in IDAHO.** JUDGE HARMER dismissed MOTHER'S
8 motion of Contempt of court against FATHER. JUDGE HARMER stated
9 in court, he did not like the way MOTHER'S documents were prepared.
10 JUDGE HARMER stated that he does not enforce foreign orders.
11 MOTHER had filed multiple exhibits in her Contempt motion. MOTHER
12 was very clear in FATHER's contempt charges. MOTHER'S Contempt
13 of Court complaint was better prepared than the average pro-se
14 litigant, and should not have been dismissed.

15
16
17 **Bias: Judge Harmer refused to enforce custody orders that FATHER was**
18 **violating.**

19
20 d. Previously, Judge Redman ordered MOTHER to **jail for 5 days** for
21 Contempt of a 2012 CALIFORNIA foreign "gag" order that was
22 intended to keep MOTHER from discussing missing marital money.
23 This CALIFORNIA order was **not filed with the custody orders.**
24 MOTHER'S crime, she sent an email response to FATHER requesting
25 he act on the QDRO order, and she sent an email response to
26 FATHER'S email, custody interference and refusing counseling with
27

1 D.B. MOTHER stated in her response to FATHER, "You will clean
2 toilets in Hell one day". Five days in jail, harsh punishment for a non-
3 threatening email, responding to FATHER'S email. MOTHER's email
4 responses were due to frustration for being denied her court ordered
5 rights by FATHER. FATHER was in Contempt for properly filed custody
6 orders. FATHER was in contempt of court for refusing D.B and
7 MOTHER counseling and the 3pm exchange time on non-school day
8 Fridays. MOTHER discussed this injustice in person with TUBBS, and
9 to JUDGE HARMER during hearings, also written in motions. The fact
10 that FATHER lied under oath to discredit MOTHER to generate a harsh
11 sentence of jail time was brought to the attention of the courts many
12 times, and I was silenced from this discussion each time by JUDGE
13 HARMER.
14
15

16 **Bias: MOTHER'S motion for contempt against FATHER was for serious**
17 **issues, refusal to report D.B medical care she was seen multiple times for**
18 **medical issues, D.B receiving an HPV vaccine without MOTHER'S**
19 **knowledge or permission, refusal to allow MOTHER to participate in**
20 **counseling that was desperately needed, and much more. MOTHER'S**
21 **motion of Contempt should not have been dismissed with prejudice.**
22 **MOTHER was ordered to pay FATHER'S legal fees when Contempt was**
23 **dismissed with prejudice. Perjury and being untruth in motions, and**
24 **statements in court hearings should not have been allowed. All allegations**
25 **of being untruth SHOULD have been investigated. MOTHER requested**
26
27
28

1 **multiple situations of being untruthful be reviewed. BIAS DOES EXIST**
2 **towards her, MOTHER's requests all denied.**

3 e. MOTHER also requested Perjury considerations in her motion of
4 Contempt. MOTHER discussed this issue with TUBBS. FATHER lied
5 under oath to purposely prejudice MOTHER, to hold her in contempt in
6 Judge Redman's court, to send her to jail. FATHER told Judge Redman
7 that MOTHER was disgruntle over the fact that he received all the
8 retirement assets and that his feelings were hurt because MOTHER
9 accused him of hiding money. *FATHER cried real tears, and Judge*
10 *Redman gave him a tissue and a mean glare at MOTHER.*

11 There is a court order, filed in IDAHO, filed with the custody orders, a
12 QDRO, requesting FATHER to meet with an accountant to disclose his
13 retirement assets. FATHER was **not given** retirement assets liked he
14 stated under oath to Judge Redman. MOTHER recently discovered
15 FATHER received \$50,000 from a lawsuit involving a **Marital Property**
16 **Business.** MOTHER discovered, in IDAHO, in formal discovery, the
17 lawsuit was dismissed, but **moved to arbitration.** MOTHER filed a
18 motion to compel discovery on the recently discovered undisclosed marital
19 assets to prove to JUDGE HARMER that these assets were indeed hidden
20 marital assets and FATHER was untruthful under oath when he stated he
21 had never hidden assets.
22
23
24
25

26 **Bias: JUDGE HARMER expressed no concern of MOTHER being**
27 **disenfranchised by financial fraud and no concerns that FATHER committed**

1 marital fraud. Judge Harmer allowed perjury, no words, or sanctions.
2 JUDGE HARMER stated that all financial issues belong in CALIFORNIA court
3 and he refused to discuss financial issues, completely dismissing the QDRO
4 order written in with the IDAHO custody orders.

5
6 **Bias: MOTHER is sent of jail on a foreign 2012 order from CALIFORNIA not**
7 **intended to be enforced in IDAHO; QDRO order properly filed into the**
8 **IDAHO courts from CALIFORNIA intending to be enforced in IDAHO**
9 **dismissed by JUDGE HARMER.**

10 **Bias: Seemingly obvious, orders are only enforced on MOTHER and orders**
11 **NOT enforced on FATHER.**

12
13 IDAHO Statutes 32-717 Custody of Children – Best Interest section (e) , the
14 character of the parent: ***Financial fraud and being untruthful under oath***
15 ***demonstrated and blatant disregard of law and a obvious lack of***
16 ***character.***

17
18 f. I requested to prove that FATHER moved from CALIFORNIA to IDAHO to
19 avoid the enforcement of a QDRO, taking his chances that the QDRO
20 order would not be enforced in IDAHO. I spent 5 days in jail based on
21 perjury of a foreign order **NOT intended to be enforced in IDAHO.**
22 JUDGE HARMER refused to discuss that FATHER is in contempt of a
23 QDRO order, over \$300,000 in assets (see TRIAL).

24
25 **Bias: I believe that JUDGE HARMER was obligated to sanction FATHER for**
26 **perjury, especially because his perjury jailed MOTHER for 5 days.**

27 **MOTHER’S motion of Contempt of Court against FATHER related to custody**

1 **issues, dismissed with prejudice. MOTHER could not file Contempt in the**
2 **future. JUDGE HARMER ordered MOTHER to pay FATHER'S legal fees,**
3 **\$1,300. There was nothing wrong with MOTHER'S exhibits in her motion**
4 **for Contempt. MOTHER was denied her RIGHT to hold FATHER in contempt**
5 **for his many violations. FATHER'S behaviors were far more damaging and**
6 **harmful to D.B than MOTHER'S email about cleaning toilets in hell.**

8 **II. Custody Evaluation of Eric Jones**

9 g. FATHER lied to custody evaluator Eric Jones that MOTHER accused
10 multi-people of molesting D.B.. MOTHER never accused anyone of
11 molestation of D.B. *(The only people that made accusations of*
12 *molestation were FATHER's niece and nephew (COUSINS). These*
13 *children, now adults accused FATHER's father (GRAND-FATHER) of*
14 *sexual molestation and have never recanted).* FATHER'S deliberate
15 action to slander MOTHER to the point of loss of custody so
16 concerning, any reasonable person can conclude that this was ground
17 for immediate change of custody, and FATHER to receive supervised
18 visitation. MOTHER was ordered Therapeutic Supervised Visitation
19 (TSV) by JUDGE HARMER because she took her teen-aged D.B'S
20 phone away, for foul language. Clearly the appropriate punishment,
21 within MOTHER rights as a parent. D.B. had a teenaged temper
22 tantrum for which MOTHER refused to cave into.

23 **Bias: FATHER not held to the same standards as MOTHER. FATHER essentially**
24 **given a pass for being untruthful on our Custody Evaluation. This was the main**
25

1 factor that led Custody Evaluator, Eric Jones (JONES) to choose FATHER to be
2 primary custodian, JONES also recommended MOTHER not be allowed to leave the
3 county of Twin Falls with D.B.

4 **Bias: FATHER refused MOTHER'S requests to abide by the court order and allow**
5 **counseling with D.B. JUDGE HARMER dismissed denial of counseling as a trigger**
6 **that led to the communication breakdown, cause of D.B'S foul language to**
7 **MOTHER, that led to losing her phone. MOTHER contends that if court orders were**
8 **enforced, MOTHER would have highly likely NOT been ordered for Therapeutic**
9 **Supervised Visitation and Melisa (OSEN) LCSW, would have been unable to falsely**
10 **accuse MOTHER of talking about FATHER to D.B. JUDGE HARMER's refusal to take**
11 **notice/investigate evidence that sexual abuse allegation had been made against**
12 **GRAND-FATHER placed D.B directly in harm's way. D.B is often left in the care of**
13 **GRAND-FATHER. D.B's recent ER visit of suicide may have also been related to**
14 **sexual abuse. Only a child psychologist is qualified to determine sexual abuse.**
15 **Contrary to OSEN'S LCSW , grandiose statement, she is NOT as qualified to treat**
16 **suicidal teens, or sexual abuse as a Child psychologist (see IV Custody Hearing)**
17 **and the request for an evaluation by a child psychologist denied by JUDGE**
18 **HARMER left D.B in harm's way. D.B became suicide in the care of OSEN. OSEN'S**
19 **"therapy" has not helped D.B.**

21 h. MOTHER discussed all issues TUBBS. The order for TSV could not be
22 met (see III TSV), and that Judger Harmer's refusal of MOTHER'S
23 request to change it to counseling and/or supervised visitation and
24 the separation of MOTHER and daughter *may* lead to D.B. succeeding
25 in suicide. TUBBS expressed no concern for the health and welfare of
26 D.B, only stating that if I am unhappy with any ruling I can file for an
27

1 Appeal. I am educated enough to know that Appeals are very
2 expensive, and can take years. My response to TUBBS.

3 NOTE: *D.B. made is VERY CLEAR in JONES custody evaluation that she*
4 *desired to be with MOTHER. Discussed with TUBBS, JUDGE HARMER*
5 *should have been removed from the custody case, he lacks the*
6 *experience in a high-conflict custody case. TUBBS may have had a duty*
7 *to disqualify JUDGE HARMER, my complaints and concerns about*
8 *racketeering ignored by TUBB's and other in charge. MOTHER unclear if*
9 *this duty falls in her TUBB'S job description.*

11 **III. TSV Therapeutic Supervised Visitation**

12 **i. Discussed with JUDGE HARMER many times: Jason Beard**

13 (BEARD) of Preferred Child and Family Services (PCFS) refused to
14 provide MOTHER TSV. BEARD was referred to MOTHER by the courts,
15 Shelley Carson (CARSON) Family court services district manager.
16 BEARD is the ONLY person in Twin Fall qualified to provide TSV.
17 CARSON appeared in front of JUDGE HARMER at two hearings,
18 CARSON provided testimony that no one else provided TSV in our
19 area at this time.

20
21
22 j. BEARD, stated during our only TSV, he requested that I pay him
23 \$1,200 just to start to *process* of TSV. He requested \$200/hr. for the
24 any actual work. MOTHER paid BEARD for TSV, \$200. MOTHER only
25 had one TSV with D.B., check payable to PCFC. During our session
26 D.B and I talked, viewed recent photos of her pets and played a
27

1 game. I gave D.B her Easter Basket. BEARD did nothing, he took
2 notes. There was no counseling involved in our \$200.00 session.

3 k. Discussed privately with BEARD at our only TSV visit, his business
4 partner, JONES excepted two checks payable to PCFS \$3000 for the
5 Custody Evaluation and \$1,000 for a psychiatric evaluation (PE) on
6 MOTHER. MOTHER spent over 4 hours completing the PE at PCFS,
7 that included computer forms and interview with JONES. JONES filed
8 OUR custody evaluation **after his professional licensing board**
9 **suspended him**. The Professional Licensing Board also fined JONES
10 almost \$10,000.00 due to years of serious infractions. JONES
11 committed fraud within the courts and families in Twin Falls. MOTHER
12 did not receive the PE that she paid for and spent hours completing in
13 the PCFS office.

14
15
16 l. The reason for such a harsh punishment, JONES, for many years
17 provided psychiatric evaluations and made custody decisions without
18 the credentials to provide this service. FOR MANY YEARS ERIC JONES
19 WAS ENGAGING IN FRAUD IN TWIN FALLS FAMILY COURT. MOTHER
20 reported this injustice and FRAUD in a letter to the Mayor, and board
21 of supervisors. **JUDGE HARMER is aware of MOTHER letters,**
22 discussed at our custody hearing, MOTHER letters, where she "spoke
23 out" about the illegal and immoral conduct of PCFC, JONES and
24 BEARD, fraud on not just MOTHER, but the people of Twin Falls, for
25 many years. MOTHER spoke about the declining mental health of
26
27
28

1 D.B. because of PCFS evaluation was full of slanderous, libel,
2 untruthful statements, JONES has an obligation to investigate all
3 facts, he swindled money out of MOTHER, a behavior he committed
4 for years in Twin Falls family court. The evaluation prepared by PCFS
5 was untruthful, I never accused anyone of molesting D.B., told to
6 JUDGE HARMER in words many times, and in motions. Any
7 reasonable person can conclude that such a defamatory lie made
8 regarding false claims of sexual molestation by FATHER against
9 MOTHER should warrant immediate complete loss of custody.
10

11 **Bias: JUDGE HARMER should have looked further into these libelous lies**
12 **that FATHER created, accusing MOTHER of false allegation of molestation.**
13 **If custody is to be denied due to a false allegation, the recommendations**
14 **of JONES considered in court, MOTHER should be equally treated. Custody**
15 **should have been denied to FATHER for creating such an atrocious false**
16 **allegation in regards to sexual abuse. Lying to a custody evaluator should**
17 **have been considered immediate grounds for loss of custody.**
18

19 **Bias: JUDGE HARMER had an obligation to investigate MOTHER claims. He**
20 **had an obligation to ensure that a proper custody evaluation was**
21 **completed, but instead protected JONES and BEARD, punishing MOTHER for**
22 **exposing JONES many years of fraud, excessively high costs of BEARD'S**
23 **TSV, denied MOTHER'S request to have contact by supervised visitation**
24 **and counseling.**
25
26
27
28

1 m. MOTHER discussed with BEARD (reported to JUDGE HARMER at
2 custody hearing) the despicable false allegation FATHER made about
3 her reported in his business partner's JONES custody evaluation.
4 MOTHER requested of BEARD to do the "right thing", tell the court
5 about JONES egregious error in his custody evaluation. MOTHER
6 requested of BEARD to discuss that such a heinous false allegation by
7 FATHER, lying to JONES, may warrant immediate loss of custody.
8 BEARD acted unethically, he refused to honor his business partner's
9 obligation to provide a valid custody evaluation. **The JONES**
10 **custody evaluation was filed into the courts weeks after JONES**
11 **was ordered to cease by his professional licensing board (also**
12 **reported to JUDGE HARMER).** MOTHER requested BEARD
13 investigate MOTHER's claim that she NEVER accused anyone of
14 molesting D.B. MOTHER contended that COUSINS made molestation
15 allegations, and D.B. may be harmed in the care of GRAND-FATHER.
16 Police reports exists, and a restraining order of no-contact court
17 ordered to protect COUSINS when they were minors against the
18 entire family on FATHER's side. COUSIN met with JONES and OSEN
19 and provided documentation and spoke out to protect D.B from being
20 molested. COUSIN is a Deputy Sheriff.
21
22 MOTHER believes COUSINS are telling the truth. This COUSIN
23 concern discussed with BEARD and discussed many times and in
24
25
26
27
28

1 written motions before JUDGE HARMER. MOTHER concerns about the
2 safety of D.B discussed with TUBBS.

3 **Bias: The history of sexual abuse by GRAND-FATHER, D.B.'s suicide ER**
4 **visit, may have been a result of being sexually abused and having no**
5 **contact with her mother of over 10 months. D.B. needed to be evaluated by**
6 **a child psychologist, a social worker is NOT qualified for what D.B. needs.**

7 **Bias: JUDGE HARMER refusing MOTHER's two formal requests, even**
8 **scolding MOTHER in court for being "uncooperative with BEARD" as if**
9 **MOTHER deserved no contact with D.B because MOTHER refused to "stay**
10 **quiet", and "pay" BEARD \$1,200, and "overlook" BEARD and JONES**
11 **business, PCFS. Essentially, allow PCFS to "get away with" years of**
12 **producing psychiatric evaluations without credentials and filing MOTHER**
13 **custody evaluation after JONES signed an order to cease. MOTHER**
14 **contended and pleaded with JUDGE HARMER that No crime should go**
15 **unpunished. MOTHER has not committed a crime, did not abuse or neglect.**
16 **JONES committed a fraud, many times, for many years, and was fined**
17 **\$10,000 dollars. MOTHER contends that PCFS is engaging in racketeering.**
18 **JUDGE HARMER forbid MOTHER's discussion about PCFS, BEARD and**
19 **JONES, only mentioning them when discussed by FATHER's and FATHER's**
20 **Counsel. JUDGE HARMER spoke of PCFS, BEARD and JONES seemingly**
21 **ONLY when it favored FATHER's defense to seek primary custody and keep**
22 **MOTHER from contact with D.B.**
23
24
25
26
27
28

1 n. To JUDGE HARMER, MOTHER stated at multiple hearing including at
2 custody trial, and in written motions: BEARD is the ONLY provider of
3 TSV, this order is advertised on the court house website. I am certain
4 that requesting \$1,200 for "no reason whatsoever" other than BEARD
5 can get away with this, being the **only provider** in Twin Falls is an act
6 of **racketeering**, and the courts should be aware that this highly
7 illegal practice the courts are involved in, BEARD directly referred to
8 me by Shelly Carson (CARSON). CARSON is Family Court Serviced
9 Manager.
10

11 (Glick v. Koenig, 766 F.2d 265). "Judges will not be deprived of immunity
12 for erroneous acts or even those actions performed maliciously or in
13 excess of authority."
14

15 **Bias: All Judges are required to follow the rules of law. MOTHER was**
16 **defrauded out of \$4,000 by JONES at PCF. The bias exists protecting**
17 **JONES and BEARD. JONES, BEARD and JUDGE HARMER are ALL members**
18 **of the Church of Latter-day Saints (MORMONS). JONES an Elder of this**
19 **Church in Buhl. BEARD AND JUDGE HARMER ATTENDED BRINGHAM YOUNG**
20 **UNIVERSITY. MORMONS are required to give 10% of their income to their**
21 **church. BEARD requested of MOTHER, reported to JUDGE HARMER, \$1,200**
22 **to "start the process" of TSV. (MOTHER HAS NOT DISCOVERED ANY OTHER PERSON THAT**
23 **CHARGES A FEE TO START THE PROCESS OF TSV IN THE ENTIRE STATE OF IDAHO) \$200/hr. for**
24 **the actual work, of counseling and appearing in court. BEARD stated he**
25 **required 10 sessions before any testimony in court. TSV costs at minimum**
26
27
28

1 **\$3,200 in Twin Falls. This is an unnecessarily high expense on the citizens**
2 **of Twin Falls. A large money-making venture for BEARD and the Church of**
3 **Latter-day Saints, receiving 10% from BEARD. MOTHER is convinced she**
4 **exposed a highly illegal racketeering scheme, BEARD the only provider of**
5 **TSV, testimony at hearing by CARSON.**

6
7 **Bias exists in harsh punishment of MOTHER not allowing her regular**
8 **supervised visitation with D.B and counseling. BEARDS fee was excessive**
9 **and highly likely considered racketeering. CARSON stated BEARD is the**
10 **only one.**

11
12
13 **JUDGE HARMER violated Federal Rule: Federal Title IV-E requires**
14 **states to make a reasonable effort to reunify families.**

15 o. MOTHER sent letters (LETTER) to Twin Falls' Mayor, and Board of
16 Supervisors (BS) to report JONES order to cease custody evaluations,
17 and years of fraud. MOTHER sent Mayor and BS a copy of JONES
18 report from "Board of Professional Licenses" available online. MOTHER
19 provided *proof* that JONES provided years of psychiatric evaluation
20 without credentials to the citizens of Twin Falls. JUDGE HARMER
21 aware of this LETTER discussed at custody hearing by Jennifer Bergin,
22 FATHER'S lawyer allowed to discredit me as being "crazy". MOTHER
23 was unable to speak about JONES during trial, only a brief statement
24 that I was confident that Twin Falls Family Court was engaging in
25 illegal activity with PCFS, Racketeering. JUDGE HARMER **ALLOWED**

1 MOTHER'S statement about her concerns of racketeering to be used in
2 the Custody hearing by FATHER's counsel, to accuse her of being
3 paranoid, like her 2012 Dr. Kerner CALIFORNIA psychiatric evaluation
4 claimed her to be.

5
6 **Bias: MOTHER not Paranoid. The behavior of the courts and PCFS meets**
7 **the criteria of Racketeering** *"Racketeering refers to crimes committed at a state or federal level.*

8 *Racketeering may refer to the act of acquiring a business operation through illegal activity, operating a business with*
9 *illegally-derived income, or using a business operation to commit illegal acts. Federal crimes of racketeering include*
10 *bribery, various fraud offenses, gambling offenses, money laundering, a number of financial and economic crimes,*
11 *obstructing justice or a criminal investigation, murder for hire, and sexual exploitation of children."*

12 **Bias: MOTHER may not receive fair judgement by any MORMON Judge,**
13 **including JUDGE HARMER, due to her disclosure of a *potential* racketeering**
14 **scheme involving MORMON Judges and PCFS TSV orders. Family Court**
15 **advertising TSV on the Court House Website. I have not received any**
16 **response from the Mayor of Twin Falls, or Board of supervisors. Clearly, the**
17 **courts receiving my letters, brought to the attention of FATHER's Lawyer.**

18 **Bias: Hearsay of MOTHER's letters should not have been discussed at**
19 **custody hearing. MOTHER did not receive any response to her letter, yet,**
20 **FATHER'S lawyer received response and MOTHER not allowed to view.**
21 **JUDGE HARMER acknowledged letters were received at custody hearing.**

22 **Bias: MOTHER very concerned about the lack of consideration of a Federal**
23 **crime being committed at the Twin Falls Family Court House effecting an**
24 **entire community not addressed. MOTHER is concerned that she has been**
25 **unduly punished with lack of contact of D.B for "Whistleblowing" a crime**
26
27
28

1 **protected by Federal Government Statues.** "A whistleblower is a person who exposes
2 any kind of information or activity that is deemed illegal, unethical, or not correct within an
3 organization that is either private or public. The Whistleblower Protection Act was made into federal
4 law in the United States in 1989".

5 **IV. The Custody Hearing**

6
7 p. JUDGE HARMER refused MOTHER many requests, verbal requests at
8 hearings and in motions for a psychiatric evaluation on FATHER.
9 JUDGE HARMER **refused to discuss or allow any evidence into**
10 **our case** that *FATHER spent nine nights in a mental hospital*
11 *(CALIFORNIA 5150 Hold)* He was taken by police car to a hospital for
12 psychiatric care according to a Morgan Hill California police report.
13 JUDGE HARMER denied MOTHER'S request to be discussed or
14 admitted into evidence. FATHER violated his mental health hold; he
15 was in possession of an arsenal of weapons. MOTHER was concerned
16 for the safety of D.B because FATHER used guns to intimidate
17 MOTHER during our short marriage.
18

19
20 **Bias: MOTHERS psychiatric evaluation from 2012 was allowed during a**
21 **custody hearing. FATHER did not have to provide any psychiatric history.**
22 **FATHER had a very concerning psychiatric history, committed involuntarily**
23 **for 9 nights, lied to the IDAHO courts that in CALIFORNIA his mental**
24 **health stay was ruled privileged, MOTHER was denied a mental health**
25 **diagnosis of FATHER. information all dismissed by JUDGE HARMER.**
26
27
28

1 **Bias: It is a reasonable request to have a mental health diagnosis of a**
2 **FATHER seeking primary custody, especially when FATHER had been**
3 **involuntarily committed for 9 nights.**

4 q. Almost immediately FATHER went on welfare when he moved to
5 IDAHO. JUDGE HARMER stated in his custody order/response to
6 grant sole custody to FATHER, that the \$50,000/yr. job FATHER stated
7 he had waiting for him in IDAHO in his CALIFORNIA move away motion
8 just did not work out. **MOTHER CONTENDS, Untrue,** MOTHER
9 provided D.B health and welfare card as proof he immediately went of
10 IDAHO welfare. **FATHER did not have a \$50,000/yr. job in**
11 **IDAHO waiting for him. FATHER: REFUSED TO PROVIDE PROOF IN**
12 **FORMAL DISCOVERY, DISCUSSED with JUDGE HARMER.**

15 **Bias: JUDGE HARMER refused to discuss or demand poof of FATHER'S**
16 **\$50,000/yr. job offer. No formal job offers in writing has been admitted**
17 **into evidence, like MOTHER requested. FATHER provided no evidence of**
18 **PROOF that his \$50,000/job simply did not work out, or even existed.**
19 **MOTHER'S claim, FATHER moved to IDAHO because he met a woman online**
20 **dismissed. Also, MOTHER provided medical insurance for D.B. FATHER had**
21 **no reason to apply for medical insurance or free lunch program at school**
22 **for D.B unless he was applying for other services within the first month of**
23 **moving to IDAHO. FATHER wasted no time when he arrived in IDAHO to**
24 **apply for welfare. NO evidence exists proving otherwise.**

1 r. JUDGE HARMER gave great credit to MOTHER psychiatric evaluation
2 from Dr. Michael Kerner from 2012. Kerner's report conveniently left
3 out that MOTHER was under the care of a Neurologist for
4 uncontrollable migraines in 2011-12; Kerner did not discuss any
5 domestic violence MOTHER survived.
6

7 **Bias: JUDGE HARMER refused MOTHER'S evidence that Kerner had many**
8 **complaints from other women that their abuse was conveniently left out of**
9 **their forced psychiatric evaluations. Kerner was a fraud like JONES.**

10 **MOTHER does not suffer for paranoid delusions. JUDGE HARMER refused to**
11 **look at MOTHER beaten face (Exhibit THREE) Judge Harman refused to give**
12 **credit to MOTHER, working in postpartum at St. Luke's Hospital caring for**
13 **new born babies. JUDGE HARMER was bias, relying solely on an 8-year-old**
14 **psychiatric evaluation during a high-conflict divorce. MOTHER paid for a**
15 **Psychiatric evaluation with JONES. JONES swindled MOTHER out of**
16 **\$1,000.00.**
17

18 s. MOTHER gave TRUTHFUL testimony under oath that she was
19 under the care of a Neurologist, Dr. Helman in 2010 for the treatment
20 of night terrors, uncontrollable, debilitating headaches and MOTHER
21 had a diagnosis of Post-Traumatic Stress Disorder as a result of abuse
22 she survived, gun intimidation, financial distress losing MOTHER'S
23 home due to FATHERs taking the second mortgage on the marital
24 home for \$170,000 in cash for himself, FATHER'S bankruptcy fraud;
25 MOTHER lost \$300,000 of her premarital asset investment in a home
26
27
28

1 owned together with FATHER for only three years. MOTHER'S stress,
2 life from 2010-2012. MOTHER had owned a home as a single woman
3 since she was 25 years old. FATHER purposely made MOTHER
4 homeless taking all MOTHER's pre-marital money. MOTHER had to
5 move home with father, two hours away from D.B and could no longer
6 volunteer at her school. Since MOTHER divorce in December 2014,
7 she completed a Bachelor's degree in Nursing, she moved to IDAHO
8 alone, two months after the death of her father, secured a home and
9 a job as a Dialysis Registered Nurse Internship and lived alone
10 independently in a home in Buhl.
11

12
13 **Bias: JUDGE HARMER stated at the custody hearing that he**
14 **would not consider, or give littler consideration to any**
15 **evidence from CALIFORNIA, yet he gave great importance of**
16 **MOTHER's psychiatric evaluation from 2012, four years before**
17 **MOTHER moved to IDAHO. MOTHER independence clearly**
18 **proves that she was completely emotionally stable enough to**
19 **care for D.B. Mother completed a Bachelor's Degree.**
20

21 **Troxel v. Granville, 530 U.S. 57 (2000)** *Giving a state court judge the discretion to determine*
22 *the best interests of the child in these situations violates due process, especially when there is*
23 *no allegation that the parent is unfit.*
24

25 **MOTHER cares for new born babies at St. Luke's. Communication issues does not**
26 **make a mother unfit to parent. Mother was in her rights to take D.B's phone as**
27 **punishment.**
28

1 **Bias: MOTHER had a \$50,000 a year Nursing job waiting for her when she**
2 **moved to IDAHO, someone declared unstable "crazy" person would not**
3 **have accomplished such high level of independence. FATHER lived on**
4 **welfare and support of his parents and refused to return to the workforce**
5 **permanently.**

6
7 **Bias: JUDGE HARMER was bias in denying MOTHER request for a**
8 **psychiatric evaluation of FATHER, especially because he was caught in a lie**
9 **trying to avoid a psychiatric evaluation, and MOTHER had a police report on**
10 **the incident, FATHER was taken to the mental hospital by police car,**
11 **unvoluntary.**

12
13 t. FACT Reported to JUDGE HARMER under oath of MOTHER: FATHER
14 refused formal discovery in CALIFORNIA and MOTHER did not have
15 the energy to Compel. MOTHER was under the care of Dr. Helman a
16 neurologist, representing herself in family court, MOTHER had no
17 money, maintaining a stressful job at a trauma center, and was
18 battling FATHER for custody. MOTHER did not have the strength to
19 Compel discovery. FATHER collected welfare and his parents paid his
20 legal fees in CALIFORNIA.

21
22 **Bias: JUDGE HARMER dismissed MOTHER truthful claim, MOTHER never**
23 **lied to him, with only the WORDS a habitually untruthful FATHER, JUDGE**
24 **HARMER NEVER requested proof of such privilege to disclose his Mental**
25 **health stay. JUDGE HARMER refused to acknowledge MOTHER**
26 **independence, leaving behind a comfort zone in CALIFORNIA, for IDAHO,**

1 **alone, to maintain contact with D.B.. Any reasonable person would agree a**
2 **person capable of such independence/ earning he Bachelors in Nursing**
3 **degree is NOT the person for which Kerner describes. JUDGE HARMER**
4 **refused all discussion or evidence that FATHER committed bankruptcy**
5 **fraud, destroying MOTHER good credit, leaving MOTHER homeless because**
6 **this happened in CALIFORNIA according to JUDGE HARMER at trial.**
7 **FATHER leaving IDAHO, not for a job but to hide the \$50,000 he was to**
8 **receive from the lawsuit related of our business and avoid the division of**
9 **his retirement assets QDRO apparently obvious to me; JUDGE HARMER**
10 **refuse to allow me to even discuss any financial improprieties. This is bias,**
11 **it falls under Character of parent requesting custody (see Best Interest of**
12 **the Child Standards)**
13
14

15 u. Expert witness Melisa OSEN LCSW (OSEN) was called to the stand on
16 two separate occasion. She gave testimony that was UNTRUTHFUL
17 the first time. MOTHER requested D.B counseling notes so she could
18 prove OSEN was untruthful. The many harmful things that OSEN said
19 about MOTHER proven to be untrue at the custody hearing. OSEN so
20 concerned about preventing a lawsuit, requested, MOTHER be denied
21 access to counseling notes, and a gag order so MOTHER was not
22 allowed to talk about what was discovered in D.B's counseling
23 records. OSEN did this because MOTHER sent OSEN an email when
24 she was at the emergency room trying to find out about D.B's suicide
25 attempts. MOTHER reminded OSEN, she lied under oath to take D.B
26
27
28

1 from her, MOTHER stated she was planning on suing her. D.B. was in
2 her care, away from MOTHER, now suicidal and OSEN is responsible
3 for lying to JUDGE HARMER. OSEN filed the motion to keep MOTHER
4 from having access to D.B counseling records. At OSEN'S hearing,
5 OSEN was in the presence of FATHER'S lawyer, Jennifer Bergin **and**
6 her private lawyer. JUDGE HARMER ruled, MOTHER was only allowed
7 to view D.B counseling records at the court house, take notes and
8 NEVER speak about what MOTHER discovered especially to D.B.
9 Leaving OSEN free to continue to lie under oath at our next hearing.
10 OSEN stated during our custody hearing that she was just has
11 qualified to diagnose and treat D.B as a child psychologist. OSEN
12 characterized MOTHER as a MOTHER that would view D.B.'s counseling
13 records and shame her. This is NOT something MOTHER would do,
14 OSEN was not privileged to the behaviors of MOTHER, had little
15 contact with MOTHER, and was not an expert to make any comments
16 about MOTHER.
17 MOTHER needed D. B'S counseling records to PROVE OSEN committed
18 perjury, lied under oath and could not be trusted, D.B needed a non-
19 bias child psychologist. D.B is showing signs that she may be
20 experiencing sexual abuse in the care of a family that has been
21 accused of abuse by D.B's cousins. So credible, a no-contact order
22 was issued. OSEN met personally with one of the COUSINS to discuss
23 her concerns about D.B safety. OSEN gag order was requested by
24
25
26
27
28

1 her to make it hard for me MOTHER to sue her or report her perjury
2 to others.

3 **Bias: MOTHER pointed out many untruthful damaging statements that**
4 **OSEN stated under oath during her first time on the witness stand.**

5 **MOTHER cannot discuss because of the gag order. The fact that FATHER's**
6 **lawyer, Jennifer Bergin, was present at the OSEN hearing should not have**
7 **been permitted. Proves OSEN is also Bias, there for FATHER not D.B.**
8 **Bergin represents FATHER, and not D.B or OSEN.**

9 **BIAS: An averagely educated person can come to an obvious conclusion**
10 **that a LCSW is not as qualified to care for a suicidal teen as a child**
11 **psychologist. OSEN claimed she was just as qualified as a doctor of mental**
12 **health. JUDGE HARMER allowing many of untruthful statements made by**
13 **OSEN, keeping MOTHER, and D.B from a mental health Doctor was**
14 **completely false, and unjustified. There is a huge difference between a**
15 **Master's degree and a Doctorate. D.B became suicidal in the care of OSEN.**
16 **D.B became suicidal because she desired to be away from her father and**
17 **live with her MOTHER, like she stated in our custody evaluation. She had**
18 **NO contact with her MOTHER for over 10 months at this point in time,**
19 **before she was seen for suicide. Obviously MOTHER is not the problem,**
20 **D.B's problem lies with lying father and social worker OSEN. JUDGE**
21 **HARMER refused to discuss with MOTHER during our custody hearing that**
22 **social worker believe they have judicial immunity, and therefore are free to**
23 **lie and that a child psychologist is more qualified, just because OSEN**
24

1 **states she is qualified does not make it true, she is protected by judicial**
2 **immunity.**

3 **Bias: There is no reasonable explanation for the presence of Jennifer**
4 **Bergin to be present at OSEN'S Motion to request that I not be able to view**
5 **D.B'S counseling record. This is clear evidence that OSEN was not acting in**
6 **the best interest of D.B, but for herself and the ability to align herself with**
7 **Twin Falls lawyers for profit.**

8 **Bias: MOTHER denied an expert witness of her own. MOTHER requested a**
9 **child psychologist. MOTHER requested supervised visits to prove that D.B**
10 **and MOTHER are very close and do not have any issues that warrant**
11 **separation.**

12
13
14 v. JUDGE HARMER allowed FATHER to submit a created EXCEL spread
15 sheet to represent MOTHER harassing phone calls. When MOTHER
16 spoke up that this document does not represent MOTHER phone bill, it
17 was created by FATHER further proof that he has no intention to be
18 truthful, that his habitual lying was concerning and he needed a
19 psychiatric evaluation.
20

21 **Bias: JUDGE HARMER admitting this created spreadsheet into evidence,**
22 **along with MOTHER computer-generated phone bill. Bias: MOTHER was**
23 **accused of being out of line and disruptive because she was so upset that**
24 **JUDGE HARMER would even consider false evidence, and not hold FATHER**
25 **accountable for this damaging lie that MOTHER called and harass him and**
26 **D.B often.**

1 w.After hearing MOTHER was ordered to pay 60% of out of pocket
2 medical bills.

3 **Bias: This is clear proof of bias towards MOTHER. In most all custody**
4 **rulings, parents share out of pocket medical expenses. D.B is on Medicaid;**
5 **FATHER has no monthly health care premiums.**

6
7 x. MOTHER filed a separate filing listing all the fraudulent documents that
8 FATHER submitted into evidence.

9 **Bias: Emails and documents were concerning, a high probability of fraud.**
10 **Court ordered parenting classes; number was obviously changed. The**
11 **EXCEL spreadsheet FATHER submitted has proof I harass him, had and**
12 **obvious typo that I discovered after trial.**

13
14 **Bias: JUDGE HARMER dismissed MOTHER concerns of fraudulent**
15 **documents, he never addressed MOTHER concerns of fraud upon the court.**

16
17 y. JUDGE HARMER has denied MOTHER phone calls with D.B, all gifts are
18 to be reviewed by father to see if they are appropriate in his court
19 orders.

20 **Bias: MOTHER has NEVER sent D.B. an inappropriate gift, never stated**
21 **anything improper to D.B**

22 **Troxel v. Granville, 530 U.S. 57 (2000) ...It is reasonable to presume that parents will act**
23 **in the best interests of their children, so the state should not interfere and take that role**
24 **away from them.**

25
26 *MOTHER acted in the best interest of D.B. She tried to enforce the court order to have*
27 *counseling with D.B so they could maintain healthy communication issues during her troubled*

1 *teen years. MOTHER was upset about FATHER refusal to follow a court orders for counseling*
2 *and filed CONTEMPT.*

3 **Bias: JUDGE HARMER took D.B away from MOTHER as a result of a one-day incident**
4 **between and mother and daughter, that led to the chance for FATHER to take advantage**
5 **of the small argument about respect, to terminate a mother and daughter bond. FATHER**
6 **is not acting in the best interest of D.B for seeking to terminate the relationship, of the**
7 **parent of choice. D.B. requested to live with her mother and be away from FATHER. D.B.**
8 **had many complaints about how her father mistreated her and her animals and OSEN**
9 **kept silent about D.B'S great desire to live with MOTHER. FATHER is vengeful, he owes**
10 **MOTHER over \$300,000 dollars and MOTHER is taking him to court in CALIFORNIA to**
11 **force the return of her assets.**

12
13 **Bias: JUDGE HARMER refused to discuss MOTHER'S concerns the FATHER was**
14 **seeking to take D.B away from MOTHER because she is seeking the return of \$300,000 of**
15 **assets. A caring father would not harm his children and keep them from seeing their**
16 **mother.**

17
18 **V. IDAHO Statutes 32-717 Custody of Children – Best Interest**

19 z. Best interest of the Child's standard denied by JUDGE HARMER.

20 Section (a)- MOTHER wanted and was prepared to be primary custodial
21 parent, D.B wanted to live with MOTHER.

22 Section (b) Child's preference. D.B wished to be away from her father
23 and live with her MOTHER stated clearly in JONES custody evaluation.
24 But for FATHER'S vicious slander that MOTHER falsely accused multiple
25 people of molesting D.B.; it is likely JONES would have recommended a
26 custody change to favor MOTHER. D.B. now experiencing mental health
27

1 issues away from her MOTHER. D.B claimed father yelled loudly all the
2 time. This yelling dismissed as normal to OSEN.

3 **Bias: protecting JONES and BEARD fellow MORMONS, that had an**
4 **obligation to do the rights thing by D.B. JUDGE HARMER, allowing perjury**
5 **and lies should never be tolerated in the court room. Especially from**
6 **Custody Evacuators and paid experts.**

7 Section © Interaction with parents or other family.

8 JUDGE HARMER denied regular supervised visitation and NO CONTACT
9 with D.B..

10 **Bias: MOTHER was unable to prove how close D.B and MOTHER are, and**
11 **how being apart has horrifically affected D.B's mental health. JUDGE**
12 **HARMER also dismissed MOTHER's contempt of court claim against FATHER, an**
13 **order allowing counseling for our relationship.**

14 **Bias: Not being allowed counseling with D.B left us open to communication**
15 **issues at a difficult stage in D.B life, when she really needs MOTHER. Being**
16 **kept from her MOTHER created suicidal tendencies. Being in the care of**
17 **OSEN created suicidal thoughts and tendencies. OSEN should have been**
18 **dismissed she was harming D.B.**

19 **Bias: refusing REAL proof from FATHER that MOTHER called and a harass**
20 **D.B and FATHER. This is a horrible false allegation that damaged MOTHER.**
21 **JUDGE HARMER refusing to acknowledge the TRUTH, MOTHER made no**
22 **calls, MOTHER's phone records proved such. This suicidal blame game**
23 **from FATHER was warranted granting MOTHER primary custody, this is a**

1 form of abuse of our child, neglecting her mental health care. MOTHER
2 was denied a valid custody evaluation and a psychiatric evaluation.

3 **Bias: Even if MOTHER completed all the requirements put forth Infront of**
4 **her so she may have unsupervised contact, JUDGE HARMER is ONLY going**
5 **to allow MOTHER two Friday nights a month. MOTHER will not be able to**
6 **take vacations with D.B. This is harsh punishment for anyone, more harsh**
7 **than if MOTHER committed a crime or was a recovering drug addict. It is**
8 **obvious to MOTHER that her extremely harsh punishment is due to**
9 **MOTHER exposing what is certainly racketeering, exposing the Churches**
10 **involvement with family court. JUDGE HARMER destroyed the childhood of**
11 **D.B by taking her MOTHER away from her and leaving her with her FATHER**
12 **that she requested to move away from.**

15 Section (d) Child's adjustment. MOTHER had no desire to remove D.B. from
16 the Twin Falls School District. D.B. loved her home. She had a large room with a
17 private large bathroom with a tub and shower. She has horses, goats, dogs and
18 cats. She loved all the animals. We got along well. D.B requested to live with her
19 MOTHER and away from her father. MOTHER hired JONES on behalf of D.B'S desire
20 to live with MOTHER.

22 **Bias: MOTHER should have NEVER been given TSV for doing the right thing.**
23 **JUDGE HARMER should not have punished MOTHER with the financial strain**
24 **of TSV for such a small infraction of taking the phone away from a mouthy**
25 **teen, but instead enforced the court order and allow D.B and MOTHER to**
26 **have counseling together. When JUDGE HARMER was aware that D.B was**

1 becoming suicidal away from her MOTHER he should have immediately
2 reevaluated the situation and accommodated D.B. wishes to be with her
3 MOTHER and consider that D.B'S decline happened in the care of OSEN.

4 Section (e) Character

5
6 **Bias: MOTHER was not allowed to discuss the fact that FATHER fled**
7 **CALIFORNIA to avoid paying her over \$300,000 in assets, that FATHER**
8 **committed bankruptcy fraud and marital fraud when he sold our business**
9 **for \$75,000. Claiming on his bankruptcy documents that he received**
10 **nothing from the sale of the business (fraud). MOTHER found out FATHER**
11 **received \$75,000 from the sale of the business when she discovered he**
12 **was suing our business franchise online. He then reported that the lawsuit**
13 **was dismissed when in actuality he received \$50,000.00.**

14
15 **Bias: MOTHER requested that this was proof of lack of character of**
16 **FATHER. He was willing to commit fraud to steal from MOTHER and**
17 **destroyed MOTHER credit score of 823. FATHER made MOTHER Homeless.**

18
19 **Bias: JUDGE HARMER accused me of talking out of line because I insisted**
20 **on discussing FATHER'S character. JUDGE HARMER refused any documents**
21 **proving bankruptcy fraud, and any discussion of any financial misdeed**
22 **FATHER was involved. FATHER remains in contempt of a QDRO in**
23 **CALIFORNIA on a 2014 court order JUDGE HARMER denied any discussion of**
24 **this. Also,**

25
26 **Bias: FATHER admitted he hacked into MOTHER private FACEBOOK account,**
27 **copied a private message between a lifelong friend discussing MOTHER**

1 **concerns about D.B in the care of her GRAND-FATHER. FATHER admitted**
2 **under oath to passing this private message off as public post on Facebook,**
3 **untruthful to JONES, claiming MOTHER posted on public Facebook that his**
4 **father molested his 8-year-old grandson. FATHER deceit to JONES was a**
5 **huge offence to disrupt a valid Custody Evaluation. UNPUNISHED BY JUDGE**
6 **HARMER.**

7
8 **Bias: JUDGE HARMER, FATHER committed a computer crime by hacking**
9 **into MOTHER private Facebook account, and lied to JONES. Bankruptcy**
10 **fraud is a crime, proving lack of character. A reasonable person can**
11 **conclude FATHER's actions was grounds for immediate loss of custody. He**
12 **lacks the proper character to raise a child committing a computer crime,**
13 **using private messages to sway a custody evaluator did not tarnish the**
14 **character of FATHER in the eyes of JUDGE HARMER. MOTHER did a noble**
15 **deed, risking her chance of fairness to report crimes from the past, JONES did not**
16 **have credentials for Psychiatric evaluations. Crimes from the present, BEARD taking**
17 **advantage of being the only court provider of TSV, requiring a \$3,200 commitment**
18 **was excessive, no other person charges a "start up cost". The behaviors of PCFS**
19 **are worthy of the courts cutting ties, but instead the connection continues.**

20
21
22 Section (f) Continuity of care. **Bias: MOTHER denied request for regular**
23 **counseling visits.** MOTHER provided a plan to make D.B transition to living with
24 her MOTHER as easy as possible. She even agreed to take D.B'S cat.

25
26 **Bias: MOTHER was denied custody because she talked out of line**
27 **according to JUDGE HARMER, and that she needed psychiatric care.**

1 **Bias: FATHER created such infractions deserving of loss of custody. JUDGE**
2 **HARMER is not a mental health expert. MOTHER is independent and D.B.**
3 **was requesting to be with MOTHER and away from her father, according to**
4 **the JONES evaluation. FATHER's habitual lying, computer hacking**
5 **MOTHER'S private FACEBOOK, and bankruptcy fraud should be considered**
6 **for a psychiatric evaluation. JUDGE HARMER's bias toward MOTHER, trying**
7 **to keep FATHER's dirty deeds out of the court room and increase focus on**
8 **an 8-year-old psychiatric evaluation that obviously does not match up.**
9 **MOTHER stated she was abused and diagnosis by a neurologist to have**
10 **PTSD. MOTHER behavior in court only proves that hearing the voice of**
11 **FATHER creates flash-backs, fear and panic. MOTHER survived domestic**
12 **violence. MOTHER is concerned D.B has become suicidal in FATHER and**
13 **OSEN'S care.**

16 Section (g) Domestic Violence. (Exhibit TWO) I am unsure if JUDGE HARMER
17 refused to admit the picture of MOTHER'S face after being hit by FATHER. MOTHER
18 was in a state of stress, during our custody hearing and I explained this to JUDGE
19 HARMER. The picture of MOTHER face early shows double black eyes, a large
20 hematoma over MOTHER'S eye and a swollen nose. I explained how FATHER would
21 force MOTHER into our kitchen pantry for hours, with a gun to MOTHER'S head,
22 trying to convince MOTHER to end her life. MOTHER thought she was going to die
23 many times, MOTHER filed for divorce, FATHER removed MOTHER from all bank
24 accounts, sold our business, and lied that he lost our business. FATHER forced sale
25 of MOTHER'S home, a complete financial loss of over \$350,000 of MOTHER'S
26
27

1 premarital money for a very short marriage. This stress is enough to create an
2 anxiety issue such as PTSD, proving MOTHER is telling the truth. MOTHER is still
3 standing, has a home and in a long-term relationship.

4 **Bias: JUDGE HARMER has no concerns about the physical, emotional and**
5 **financial abuse MOTHER survived, even FATHER fleeing CALIFORNIA to**
6 **avoid showing proof his retirement was lost in our business. He refused to**
7 **examine the picture of MOTHER beaten face.**

8 **Men that abuse their wives have a high likelihood of abusing their children.**
9 **That is why custody may be denied to men that abuse their wives. FATHER**
10 **seeking no contact with her mom is harming our daughter, now suicidal.**
11 **FATHER punishing MOTHER for leaving him and refusing the QDRO order.**
12 **FATHER is NOT doing what is best for our child. Our child deserves a**
13 **MOTHER, and wants her MOTHER.**

14 **Conclusion**

15 JUDGE HARMER's Bias towards MOTHER is likely because she exposed what may be
16 considered illegal racketeering relationship between Family Court and PCFS.

17 MOTHER reported concerns to the Mayor's office about JONES, BEARD and Family
18 Court. Lack of credentials, and illegal racketeering.

19 **Bias: JUDGE HARMER refused to discuss the fact MOTHER custody**
20 **evaluation created by JONES was filed after suspension, refused to read or**
21 **allow the licensing boards ruling to be admitted into evidence at our**
22 **custody hearing. Bias: being denied a proper custody evaluation and**
23 **psychiatric evaluation that MOTHER paid for. MOTHER paid for a**

1 **psychiatric evaluation to prove she was not unfit. MOTHER was a stay at**
2 **home mother, until she filed for divorce, FATHER, lied that MOTHER was**
3 **crazy just like he lied that MOTHER accused a 11-year-old boy of**
4 **Molestation, to unjustly remove custody of MOTHER. All told to Judge**
5 **Harmer.**

6
7 **The Supreme Court has ruled: a child cannot be removed from a parent**
8 **unless that they are proven to be unfit. FATHER was held involuntarily for**
9 **9 days on a mental health hold. Very bias. MOTHER denied an expert**
10 **witness to prove she is a fit parent; she is a fit parent until proven other-**
11 **wise according to a Supreme Court Ruling. D.B and MOTHER were denied**
12 **any contact for an evaluation. Bias that no one viewed D.B and MOTHER**
13 **together, and made any statement that she is unfit. All claims of being**
14 **unfit are Hearsay. JONES reported D.B. requested to be with MOTHER.**
15 **MOTHER is a fit parent in the eyes of D.B. There has been no neglect or**
16 **abuse. JUDGE HARMER took D.B form MOTHER to punish her for not being**
17 **submissive, her behavior in COURT. How is MOTHER supposed to behave**
18 **when she is wrongfully denied contact with D.B. for almost a year, and D.B.**
19 **becomes suicidal and MOTHER is denied information by FATHER and OSEN.**
20 **Bias of JUDGE HARMER, The only time, in the far future, MOTHER may**
21 **every have unsupervised visits with D.B is just 2 nights a month. This lack**
22 **of contact is an unheard of provision of custody to ANY PARENT that has**
23 **committed no crime with no drug history or abuse history. I can not find**
24 **anyone to do TSV. It took 2 months to get an appointment with a**
25
26
27
28

1 **psychiatrist, he does not work with the courts. No such psychiatrist exists.**
2 **MOTHER can only hope D.B can hang on and not succeed in suicide.**

3 I believe the only fairness I will receive in Twin Falls Family court is for a non-
4 Mormon judge it be assigned to MOTHER case. The true act of fairness is for
5 someone to undue the injustice of JUDGE HARMER and return D.B to MOTHER,
6 where she wishes to be. ALLOW D.B to see a child psychologist.

7 **Federal Title IV-E requires states to make a reasonable effort to reunify families.**

8 **Bias: JUDGE HARMER refused to modify and change his TSV order that**
9 **cannot be met. MOTHER is not an unfit mother; she is a registered nurse**
10 **with a clean record. Teenage girls have meltdowns and mother and**
11 **daughter often struggle during the teen years. MOTHER and D.B'S**
12 **relationship was completely ended at the hands of JUDGE HARMER for NO**
13 **reason other than the request of a vengeful father. Vengeful because**
14 **MOTHER is in the process on enforcing the QDRO in CALIFORNIA. FATHER**
15 **owes MOTHER \$350,000.**

16 **MOTHER is in a healthy relation with a good Man of 4 years. Proof**
17 **MOTHER can maintain stability and has communication skills.**

18
19
20
21
22 **Troxel v. Granville, 530 U.S. 57 (2000)**

23 *There is a fundamental right under the Fourteenth Amendment for a parent to oversee the care,*
24 *custody, and control of a child. The Due Process Clause prevents the government from*
25 *intruding on fundamental rights and liberty interests, one of which is the liberty interest that*
26 *parents have in controlling the care and custody of their children. The state may not give rights*
27

1 to any third party to challenge any decision by a parent regarding visitation with that parent's
2 child in state courts. Giving a state court judge the discretion to determine the best interests of
3 the child in these situations violates due process, especially when there is no allegation that the
4 parent is unfit. It is reasonable to presume that parents will act in the best interests of their
5 children, so the state should not interfere and take that role away from them.

6 **Bias: Taking a phone away from a child as punishment does not make a**
7 **parent unfit. MOTHER did not talk despairingly about FATHER to D.B like**
8 **OSEN claimed. MOTHER only asked D.B why she was depressed and**
9 **MOTHER noble act of trying to find out why D.B. was depressed was**
10 **manipulated by a social worker OSEN and FATHER to falsely accuse**
11 **MOTHER of talking disparagingly about D.Bs father. Bias: If D.B. wasn't**
12 **denied MOTHER request for a proper diagnosis from a child psychologist,**
13 **and counseling, MOTHER would have been able to prove she did not talk to**
14 **D.B'S about her father and the D.B. and MOTHER were very close.**

15
16
17 Even if MOTHER talked about FATHER it does not meet the criteria of an unfit
18 parent, but a parent that makes poor choices in conversations. JUDGE HARMER
19 was unjustified in taking D.B. from MOTHER, D.B so damaged by his decision, she
20 became suicidal.

21
22 BIAS: MOTHER denied an expert witness to prove she did not talk despairingly
23 about FATHER, only allowed to be her own witness in her behalf. MOTHER denies
24 OLSEN statement to the court that D.B stated MOTHER said bad things about
25 FATHER. This is hearsay evidence and should not have been allowed. D.B was old
26
27
28

1 enough and mature enough to choose where she wanted to live. D.B wanted to live
2 with MOTHER. FATHER lied to JONES to keep D.B from her parent of choice.

3 Punishing a child for foul language is acceptable. Anxiety does not make a parent
4 unfit. MOTHER Constitutional right to parent child has been violated in Family
5 court, Twin Falls and MOTHER believes it is because She "Blew the Whistle" on a
6 money generating racketeering scheme to fund the Mormon church and BEARD.
7 For every case a judge refers families to BEARD for TSV, he stands to profit \$3,200.
8 He is the only one, as testified in two hearing by CARSON. MOTHER is being judged
9 in a courtroom that is highly likely engaging in illegal racketeering. I am requesting
10 the dismissal of JUDGE HARMER and any Mormon Judge. I am concerned any
11 MORMON judge would be bias against me.
12
13

14 When is someone going to do the right thing for D.B. and protect her from her
15 father and OSEN that is creating suicidal thoughts and return her to her mom
16 where she requested to be? MOTHER and CHILD relationship destroyed due to
17 JUDGE HARMER. He is Bias against me.
18
19
20
21

22 Dated this day of Month, year.

23
24 _____
25 Jacqueline Bladow self-representing
26
27
28