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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY <i>ma</i>	DEPUTY

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Arlena Minerva ; Willes ,  
JJT(JFM) Petitioner,

CASE NO: CV-19-00068-PHX-

Vs

Arizona of Child safety and et al.,  
Respondents,

AFFIDAVIT IN FURTHER SUPPORT  
OF HABEAS CORPUS. NOTICE TO  
RESPONDENT'S TO CEASE AND  
DESIST WITH RETALIATION AND  
JUDICIAL INTERFERENCE .

CASE # CV-10-00068-PHX-JJT (JFM)

Additional support of Habeas Corpus:

Further Notice to the Respondents to stop (cease and desist) Judicial interference in my Jurisdiction Until this Matter is settled in my Jurisdiction before Honorable Judge J Tuchi.

CC: Honorable Judge J Tuchi

CC: (Respondents) Arizona Department of Child Safety : Olivia Douma, Sandra Leslie (Olivia Douma's Supervisor) , Lynn Hart ( Sandra Leslie's Supervisor) , Lisa Burns , Kristina Harrison, Sabren Tawil, Melissa Kevitt, Rosemary Villa , Merlin Romero ( Rosemary Villa's Supervisor) , Tatum Ranaud (Merlin Romero Tatum Ranaud's Supervisor) and Jessica Anthony Head Supervisor.

CC: (Respondent's ) Durango Juvenile "Court" : Diana Theos, Deborah Marie Oelze, Daniel Saint III (terminated council) and Daniel Hernacki (Terminated Council), Jean Elaine West, Brian Matthew Strickman , Jeff Myers , Administrator Nicolas Brian Hoskin's and Administrator Timothy James Ryan. ( All in Collusion to try and sever unlawfully my Parental rights ).

Notice is to inform the listed respondents in this Affidavit , is to again inform the Defendant's of my absence on set target date of April 17th of 2019 , of their dishonorable intention to violate my parental rights and by trying once again by their default and dishonor to try to sever the loving Mother and son bond they have NO RIGHTS TO SEVER!

This notice is to once again state I am innocent of all false charges that was brought against me by Arizona Department of Child Safety and et al . The respondents at no time addressed my Habeas Corpus in my Jurisdiction and have proven they are operating in collusion with each other to deprive me and my son JD;Z of our Constitutional rights and have since the day my son was unlawfully stripped from my loving care without a valid warrant nor a valid court order:

AFTER ACQUIRED EVIDENCE CANNOT SUPPORT CLAIMS OF EXIGENCY

\* A social worker cannot seize a child without prior judicial authorization merely in the hope that further investigation will turn up facts suggesting that the child was immediate danger of serious Physical injury.

-Jones v. County of Los Angeles (9th Cir. 2015) 802 F. 3d 990, 1007; Rogers v. County of San Joaquin ( 9th cir.2007) 487 F. 3d 1288,1294.

The Respondents have also proven by Default and dishonor by no response to the Habeas Corpus filed on my son's behalf that now Relief hereby is respectfully Demanded and is duly perfected and owing by , under and through a matter of right , fact truth and Justice .

Therefore my lack of Appearance on April 17th , 2019 is to again prevent further violation to myself and my son JD:Z rights ( Listed in this Affidavit see exhibit A) . This makes the third time also I am requesting a hearing before Honorable Judge J. Tuchi to settle this matter in the Jurisdiction in which I filed . Relief is hereby respectfully Demanded and is duly perfected , due and owing by and through a matter of right , fact truth and Justice .

My son JD;Z (See exhibit A ) , is currently being held against his will and mine by the Respondents and therefore why I am respectfully demanding relief and Justice in my Jurisdiction as the Plaintiff against the Respondent's . They have proven their intent is to settle this matter not by immediately releasing my son back into my loving care where he belongs but to prolong the proceedings further , therefore inflicting more violations and needless suffering against me and my son and by the scales of Justice the Respondents should not be allowed to continue to interfere with what I filed in my Jurisdiction seeing that They have proven themselves to be now in Default and Dishonor , ( please see writ of injunction ) .

This Affidavit is also to intercept and prevent any further trauma and damage by the Arizona Department of Child Safety and et al to me and my son . ( See Exhibit A) . They have proven Default and Dishonor and also proven Judicial interference by continuing to interfere and inflict further damage to me and my son by trying to unlawfully terminate my parental rights and have needlessly from the beginning has sought to put a wedge between our loving bond.

The entire fabricated case : JD36346 by the Arizona Department of Child Safety and et al has proven one violation after another of me and my sons rights as follows:

1. Violation of Arizona State Bill of Rights ( to govern my son's educational and and medical care ) . To govern my son's education and medical care as I see fit without any undue interference from any private lower court and any private agency ( the Respondents) .
2. The Respondents have also violated state law and constitutional law by performing a colectomy to cover for Dr. Kate Davenport and Dr. Kristy Ingebo misdiagnoses of my son's current condition of Crohn's and Colitis ( without my full written consent). Under Arizona State Bill of Rights, My son JD:Z ( See Exhibit A ) should have never been taken in the first place by Arizona Department of Child Services with the help of Phoenix children's Hospital and police without a valid warrant and without a valid court order !



**ARE ALL CPS WORKERS IN THE UNITED STATES SUBJECT TO THE 4TH, 10TH AND 14TH AMENDMENT OF OUR AMERICAN CONSTITUTION?**

Yes they are , the 4th Amendment is applicable to DCF investigators in the context of an investigation of alleged abuse or neglect as are all " Government officials " . This issue is brought out best in **Walsh v. Erie County Dept . of Job and Family services , 3:01-cv-7558**

They have denied me the right to a speedy and just trial , there was no due process hearing to affirm my guilt or no charge was filed against me in a real court of record . Again I Will state for the record that an ex parte removal is not a valid court order , nor does an ex parte removal count as a valid warrant under the supreme law of the land , Our Constitution .  
Amendment 4 , 10 and 14 were egregiously violated by the Respondents , which violation under Amendment 4 , counts as unlawful search and seizure .

Hereby Relief is Respectfully demanded due and owing in my Jurisdiction ( see writ of injunction) . As this will cause no actual and factual harm to any party in the matter filed .  
However I Arlena Minerva : Willes am respectfully demanding relief of this urgent instant matter.  
Hereby relief is respectfully demanded and is duly perfected , due and owing by, under and through a matter of right fact , truth and justice .

Therefore my lack of appearance on April 17th , 2019 at 11:30 A.M is also to prevent even further violation to myself and to my son ( diagnosed on the Autism Spectrum) JD;Z rights (listed in this affidavit) . Which only further proves their unlawful intention to try and sever my rights without my written consent to any of what they have done and are doing in violation of Constitutional , State law and Federal Law . My Parental rights should have never been interfered with by The Arizona Department of Child Safety and et al in the first place . ( See Exhibit A and B) . My Absence is a message to the respondents because of their continuance to interfere with me and my son JD;Z 's loving bond and their gross violations of Me and my son's constitutional rights , Constitutional law and state law , this urgent instant matter can only be settled by the instant release of my son JD;Z (See Exhibit A) back into my safe and loving care where he truly belongs . I do not consent to their position of holding my son against his will and mine , therefore I Arlena Minerva ; Willes am not bringing myself to the Durango Juvenile Court's Jurisdiction nor the Arizona Department of Child Safety's Jurisdiction .

This affidavit is also to put the Respondents on full notice that you as the respondent's cease and desist with violating my child JD;Z rights ( see Exhibit A) nor shall you continue to interfere with unlawfully seeking ( under listed violations of Constitutional and State law) with trying to sever our blood ties and bond or this matter will be far from settled unless my son JD;Z ( see Exhibit A) is immediately returned back into my safe and loving care where he truly belongs.

Also My son's father stated on our phone call today (Sunday) March 17th , 2019 : That Administrator Nicolas Hoskins stated his full intentions to sever my rights " seeing I was not playing with a full deck and I was not capable of operating with full capacities " my son's Father Billy Darrell Zeek also stated that he told Administrator Hoskins that I was perfectly capable of using my full faculties , to which Commissioner Nicolas Brian Hoskin's Stated was that was not the case without any proof to prove that fact . I have graduated from Bible Seminary with a 2 year college degree and without solid proof to verify this defamation of my character as a loving mother, is operating solely on bias and hearsay . I have also reported all involved to the bar and to commision of Judicial conduct for their level of involvement to withhold my son JD;Z from my loving care and their involvement in collusion to commit spoken and written perjury which is a Class C felony charge .

Also I have on record two witnesses Cristina Lawler and Crystal Nuttle as bearing witness to Administrator Nicolas Brian Hoskins biased and all involved their collusive behavior when my son was crying out to be returned home back into my safe and loving care where he knows he truly belongs , Administrator Nicolas Brian Hoskins laughed in my sons face as Rosemary Villa , Brian Strickman , Daniel Saint III, Deborah Marie Oelze , Jean West and Diane Theos on November 20th , 2018 and still yet are involved with holding my son hostage against his will and mine . ( See where my Son JD;Z Contests Arizona Department of Child Safety's Jurisdiction).

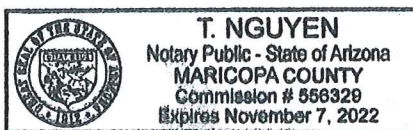
Hereby relief of this urgent and instant matter is respectfully Demanded by I , Arlena Minerva; Willes , Under and through a matter of right , fact , truth and Justice .

I , Arlena Minerva ; Willes being of sound mind and body , Sui-juris , A living woman, A living soul and ambassador of Jesus Christ .

Arlena Minerva; Willes  
3/18/19 Date before me ,

T. Nguyen

A Notary Public, Personally appeared

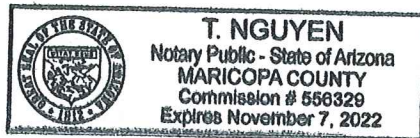


Arlena Minerva ; Willes who proved to me on the basis of satisfactory evidence to be the living woman whose name is subscribed to the within instrument and acknowledged to me on the basis of satisfactory evidence to be the living woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity , and that by her autograph(s) on the instrument the woman executed the instrument .

I certify under perjury under the lawful laws of Arizona State and the State of ARIZONA that the foregoing paragraph is true and correct . WITNESS my hand and official seal.



Signature of Notary Jurat





Monday March 18 th , 2019

CASE # CV-19-00068-PHX=JJT(JFM)

CC: Honorable Judge J . Tuchi

Honorable Judge J . Tuchi :

I , Arlena Minerva ; Willes do hereby respectfully Demand relief for this urgent and instant matter and is duly perfected , due and owing by, under and through a matter of right,fact , truth and Justice. I also respectfully demand a hearing in regards to the respondents being in default and dishonor and relief therefore is respectfully Demanded : The immediate return of my son JD:Z ( See Exhibit A),, my uniquely created biological property , back into my safe and loving care where he truly belongs immediately. Hereby , I am again for the third time I am respectfully demanding that this instant urgent matter be rectified immediately for the immediate reunification of me and my son , which is a urgent matter of right,fact , truth and Justice .

Sincerely ,

Arlena Minerva; Willes (sui-juris) a living woman , a living soul an ambassador of Jesus Christ  
And loving Mother .

CV-19-00068-PHX-JJT(JFM)

CC: Notice to honorable Judge J, Tuchi

Judicial Interference by the Arizona Department of Child Safety and Et Al and proof  
My son JD;Z is being held against his will by The respondents in trying to sever my  
God given rights as a loving mother .

COPY Original Filed On:

MAR 13 2019

CLERK OF SUPERIOR  
COURT

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IN THE SUPERIOR COURT OF THE STATE OF  
ARIZONA

IN AND FOR THE COUNTY OF  
MARICOPA

IN THE MATTER OF:

JD 36346

*JD;Z*  
~~JONATHAN ZEEB~~

~~D.C. # 19-00068-002~~

INITIAL DISCLOSURE  
STATEMENT



Person under the age of  
eighteen

(Hon. N.  
HOSKINS )

JD; Z

Child, ~~JONATHAN ZEEK~~ by and through undersigned  
counsel, hereby submits his initial disclosure statement  
pursuant to Rule 44 (D)(2), Arizona Rules of Procedure  
for the Juvenile Court, (ARPJC).

### UNCONTESTED ISSUES OF MATERIAL

FACT The minor child is JONATHAN ZEEK.  
The Indian Child Welfare Act does not apply.

### CONTESTED ISSUES

1.

The Child contests the allegation that termination of his Mother's parental  
rights is in his best interests. The Child contests  
jurisdiction.

2.

WITNESSES Counsel reserves the right to call any  
witness listed by any other party.

3.

JD; Z

~~JONATHAN ZEEK~~ Child, may be contacted through

undersigned counsel. The Child will testify to the allegations set forth in the DCS dependency petition. He will testify regarding his relationship with his parents, his desire to see his Mother, and what he believes is in his best interests.

#### EXHIBITS

1.

Counsel reserves the right to introduce any exhibit listed by any other party. Counsel reserves the right to call rebuttal witnesses if needed.

2.

NOTICES If a party objects to the admission of an exhibit, the party shall file a notice of objection and the specific grounds for each objection and provide a copy of the notice to all parties and the court within ten (10) days of receipt of the list of exhibits. Specific objections or grounds not identified in the notice of objection shall be deemed waived, unless otherwise ordered by the court. Rule 44(B)(2)(e), Ariz. R. Juv. P.

#### OBJECTIONS TO STATE'S DISCLOSURE WITNESSES:

The Child objects to any state witnesses who have not been timely disclosed. The anticipated testimony of the

witnesses may be irrelevant contrary to Rule 302, or may be based on matters of which the witness has no personal knowledge contrary to Rule 602, or may include hearsay not within any exception contrary to rule 802, or may be cumulative contrary to Rule 403, or may be character evidence not within any exception contrary to Rule 404, or may be unduly prejudicial contrary to Rule 403, and the

witnesses may not be competent contrary to Rule 601. The Child specifically objects to any and all cumulative testimony.

The Child reserves the right to make objections to specific testimony of any witness as provided by the rules of evidence and statutes applicable in these proceedings. The Child specifically objects to hearsay statements of the child being admitted without a hearing. The Child further objects to testimony of witnesses who do not have personal knowledge of the facts to which they are testifying. Child objects to any witness for whom a description of the anticipated testimony is not provided such that Child has notice of said testimony.

#### EXHIBITS

The Child objects to all Exhibits based on the following: Any exhibits not identified, any exhibits containing hearsay not within any exception (Rule 801 and 802), consisting of statements or



records not excluded by the hearsay rule but without proper foundation (Rule 802), containing hearsay within hearsay (Rule 805). They also may lack foundation. The Child objects to any exhibits for which the author is not present to testify in open court - this objection includes any documents from another provider contained in an exhibit attested to by a separate provider.

The Child also objects to any and all exhibits that have not been specifically disclosed and provided to counsel or are untimely disclosed. The Child reserves the right to enter objections to any exhibits that may be disclosed and/or provided between now and trial. The Child objects to any and all exhibits listed by ADES unless proper and appropriate foundation is provided for their admission.

The Child reserves the right to object to any and all exhibits that are not offered in compliance with the rules of evidence and statutes that are applicable to these proceedings. The Child specifically objects to any and all exhibits that are not relevant to the allegations contained in the petition and are unduly prejudicial. RESPECTFULLY SUBMITTED THIS 13th day of March, 2019.

DIANA THEOS,  
P.L.L.C.

lcha WC Diana Theos, Esquire Attorney for Father

Original filed this 13th day of March, 2019 Clerk of  
the Court Maricopa County Superior Court

Juvenile Division - Durango 3131 W. Durango  
Phoenix, AZ 85009

Copies of the foregoing hand-delivered or sent via email transmission  
this 13th day of March, 2019: Honorable J. Hoskins, Maricopa County  
Superior Court

Brian Strickman, Guardian ad  
Litem

Daniel Saint, Attorney for  
Mother (Services officially  
terminated)

Jean West, Attorney for  
Father

Dan Hernacki, GAL for  
Mother (services officially  
terminated)

Debbie Oelze, Assigned Assistant  
Attorney General