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NORTH DISTRICT OF CALIFORNIA

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

NC  
**ANDREA C. WOOD,**  
Petitioner,

vs.

**COUNTY OF CONTRA COSTA,  
LOIS HAIGHT, RAVINDER BAINS,  
M.D., ERICA BAINS, and  
BENJAMIN PACKWOOD**

Respondents.

**ORAL ARGUMENT REQUESTED**

**CASE NO.: 19-cv-3885-SK**

**AMENDED PETITION FOR  
WRIT OF HABEAS  
CORPUS PURSUANT TO  
28 U.S.C. 2241 and 28 U.S.C.  
2243**

**AMENDED PETITION FOR WRIT OF HABEAS CORPUS**

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**I. Introduction**

1. Petitioner, Andrea C. Wood, petitions this Court for a writ of habeas corpus to remedy the unlawful detention of minors HP and KP by Respondents.

2. 28 U.S.C. 2241 provides:

(a) Writs of habeas corpus may be granted by the Supreme Court, any justice thereof, the district courts and any circuit judge within their respective jurisdictions. The order of a circuit judge shall be entered in the records of the district court of the district wherein the restraint complained of is had.

(b) The Supreme Court, any justice thereof, and any circuit judge may decline to entertain an application for a writ of habeas corpus and may transfer the application for hearing and determination to the district court having jurisdiction to entertain it.

...He is in custody in violation of the Constitution or laws or treaties of the United States; or...

3. 28 U.S.C. 2241 provides:

A court, justice or judge entertaining an application for a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.

The writ, or order to show cause shall be directed to the person having custody



of the person detained. It shall be returned within three days unless for good cause additional time, not exceeding twenty days, is allowed.

The person to whom the writ or order is directed shall make a return certifying the true cause of the detention.

When the writ or order is returned a day shall be set for hearing, not more than five days after the return unless for good cause additional time is allowed.

Unless the application for the writ and the return present only issues of law the person to whom the writ is directed shall be required to produce at the hearing the body of the person detained.

The applicant or the person detained may, under oath, deny any of the facts set forth in the return or allege any other material facts.

The return and all suggestions made against it may be amended, by leave of court, before or after being filed.

The court shall summarily hear and determine the facts, and dispose of the matter as law and justice require.

## **II. Jurisdiction**

4. This Court has jurisdiction under 28 U.S.C. § 2241; Art. I, § 9, cl. 2 of the United States Constitution (Suspension Clause) and 28 U.S.C. § 1331, as Petitioner is presently in custody under color of authority of the State of California, and such custody is in violation of the Constitution, laws, or treaties of the United States.

5. This Court may grant relief pursuant to 28 U.S.C. § 2241, 5 U.S.C. § 702, and the All Writs Act, 28 U.S.C. §1651.

### **III. Venue**

6. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Northern District of California, the judicial district where HP and KP currently are in custody.

### **IV. Parties**

7. Andrea C. Wood (hereinafter “Petitioner”), is a *sui juris* resident of Orinda, Cal. residing at:

40 Hilldale Court  
Contra Costa County  
Orinda, California  
Tel.: +1 (415) 375-1686

8. Respondent County of Contra Costa (hereinafter “County”) is a county in the U.S. State of California, covering an area of 716 square miles, consisting of a population of 1.1 million residents with a principal place of business at:

751 Pine Street  
Contra Costa County  
Martinez, California 94553  
(925) 313-1180

9. Respondent County of Contra Costa (hereinafter “County”) is a county in the U.S. State of California, covering an area of 716 square miles, consisting of a population of 1.1 million residents with a principal place of business at:

751 Pine Street  
Contra Costa County  
Martinez, California 94553  
Tel.: +1 (925) 313-1180

10. Respondent Lois Haight (hereinafter "Haight") is a sui juris resident of places unknown and is a Superior Court Judge of the Superior Court of Contra Costa County with a principal place of business at:

640 Ygnacio Valley Drive  
Contra Costa County,  
Walnut Creek, California, 94596  
Tel.: +1 (925) 608-1000

11. Respondent, Ravinder Bains, M.D. (hereinafter "Bains, M.D.") is a sui juris resident of Orinda, Cal. with a principal place of business at:

275 W. MacArthur Blvd.  
Oakland, CA 94611  
Tel. +1 (510) 752-1000

12. Respondent, Erica Bains (hereinafter "Bains") is a sui juris resident or Orinda, CA with a principal residence at:

24 Hilldale Court  
Orinda, CA 94563  
Tel. +1 (925) 258-9390

13. Respondent, Benjamin Packwood (hereinafter "Packwood") is a sui juris resident or Phoenix, AZ with a principal residence at:

Unknown  
Phoenix, AZ  
Tel. Unknown

**V. Factual Allegations**



14. On August 17, 2017, TP (age 14), HP (age 12), and KP (age 7) were removed from Petitioner's, the biological mother's, home entering without an Access Order, without warrant, no authorization to enter, and without an Order of Temporary Removal all in violation of the Due Process Clause of the Fourteenth Amendment - forceable entry; there was no imminent danger present.
15. In a \$2.5 million home surrounded by a security gate and security cameras and attended by the maternal grandmother Sandra Wood DeUdy ("DeUdy"), as reported by TP, Petitioner, DeUdy, and a handyman the cupboards were always filled with nutritious food and they had a live in, full-time nanny for the children, Steffi Guggenbichler ("Guggenbichler"), approximate age 25, of Austrian decent, and a former registered nurse since on or about August 2010 terminated in June 2017. The replacement nanny was Michael Chen, Ph.D.
16. The biological father of TP, HP, and KP, Jeremy Packwood passed away in 2007.
17. DeUdy was interviewed by the county social worker Kellie Case. DeUdy objected to the taking of TP, HP, and KP and attested that any removal would be without probable cause, contrary to the legal definition of unsanitary conditions, and violation of the Due Process Clause of the Fourteenth Amendment.
18. The removal violates the rule of law in that there was no notice, no Access Order, no warrant, no authorized entry, no Order of Temporary Removal, no imminent danger, -- forceable entry and DeUdy was threatened with arrest if she resisted removal all flagrant violations of the Due Process Clause of the Fourteenth



Amendment to the U.S. Constitution.

19. Nevertheless, TP, HP, and KP were removed by the Orinda Police Department at the request of Gutierrez of Child Protective Services without notice, without an Access Order, no warrant, no authorized entry, without an Order of Temporary Removal, and notwithstanding the lack of imminent danger - forceable entry. Gutierrez, proceeded to file a malicious Detention Report that represented a scathing, unsupportable set of allegations, without evidence, based on the wrong standard of a preponderance of the evidence, and no protections against assumptions based on "the subjective values of the factfinder," that proved injurious to Petitioner (see *Valmonte*, 18 F3d at 1004, quoting *Santosky v Kramer*, 455 US 745, 762 [1982]) she palmed it off on Federal respondent Haight.
20. Upon information and belief, Haight hand picks preferred lawyers for indigent Respondents, but not Respondents with the ability to private pay; however, in Petitioner's case, a private paying Respondent, Haight did hand pick for Petitioner in violation of the Sixth Amendment which states "Parties are entitled to the counsel of their choice;" neglect proceedings in Contra Costa County are the equivalent of criminal proceedings and at least quasi criminal proceedings. Court recommended lawyers who are dependent on court referral business for their livelihood, often do not act in the best interest of the Respondents but rather seek to conspire and collude with the Contra Costa County court, in order to obtain false indications against innocent Respondents (see Richard Abrams, Attack on Corruption: 'Contra Costa

County Three Judge Recall' Launched by Parents, City Watch L.A., August 16, 2018) and the text message exchange of preferred attorney Jen Ani and respondent Lisa Schindler June 7, 2018 to June 10, 2018 to the Superior Court's refusal to admit evidence supporting the respondent, Schindler.

21. Haight's shocking, arbitrary, and egregious conduct led to the suicidal tendencies of 12 year old HP in October 2017.
22. In the case of Petitioner, this preferred lawyer was Mary P. Carey, hand selected by Federal respondent Haight in violation of Petitioner's Sixth Amendment rights. Carey, immediately proceeded contrary to the wishes of Petitioner.
23. Petitioner would often be ordered into the hallway and Carey would deal on (and quite likely off) the record of court transcripts with Haight which were strongly against Petitioner's interests. Petitioner was not privy to see these transcripts until Spring of 2018, only after the Jurisdictional trial had concluded; therefore, the transcripts were not available for use in the defense of Petitioner notwithstanding a Motion to secure transcripts on or about beginning on or about 2017 and subsequent thereto.
24. Subsequent to the Jurisdictional trial Federal defendant Carey blocked visitations with TP, HP, and KP, and obstructed justice by blocking Petitioner's evidence, made no objection to the admission of hearsay, all contributing to the finding of false allegations against Petitioner where obstructing justice is a violation of the Civil RICO statute codified as 18 U.S.C. 1961, *et seq.*

25. Unknowingly, and not in the presence of Petitioner, Carey would obstruct justice by blocking the admission of evidence that would have contributed positively to the defense of Petitioner in violation of the Civil RICO statute.
26. Social Worker Edyth Williams proceeded to tell untruths about Petitioner's visits with KP, blocked mental health sessions for HP and, therefore, family reunification efforts in violation of the Due Process Clause of the Fourteenth Amendment.
27. Federal defendant Williams stated under oath under the penalty of felony "that HP was open to visits with his mother" or words to that effect; Williams did not schedule those either. This was the latest violation of the Fourteenth Amendment in the matters of TP, HP, and KP, 361.5(a) - family unification opportunities lost.
28. Petitioner was told she could write letters and did write letters to HP in December 2017 and August 2018. Williams testified the letters were appropriate, but the letters Williams were never delivered to HP that hampers reunification. Settlement of Katie A. law - requires that HP receive mental health medical care after being 5150'd for suicidal tendencies, but HP was blocked from visits with Petitioner in violation of the ruling in *Southerland v. City of New York*, 680 F.3d 127, 142 (2d Cir. 2012) which held that parents have a substantive right to the custody of their children. Shortly afterwards HP started contemplating suicide.
29. Without Petitioner's authorization, Federal defendant Carey stated on the record "Your honor, I had made a request that there be no contact between my client



30. (Petitioner) and HP" and "if this keeps going on and on and on it is going to have some negative effects on the youngest child for sure."
31. Upon information and belief Carey made the premeditated, malicious intent to harm HP and KP, to physically separate the family, and remove HP and KP from Petitioner.
32. Petitioner has not seen HP since the date of removal; HP now has suicidal tendencies.
33. Federal defendant Carey derives financial benefit by being on the court's "preferred" lawyer referral list; Carey charged Petitioner \$75,000 from September 2017 to February 2018. Federal defendant Carey had been retained to reunify the family, secure contact amongst the family, but ultimately did everything but.
34. On January 9, 2018 Social worker Kellie Case testified "not that I recall" when asked "Did HP ever tell you that his mother (Petitioner) hit him on more than one occasion," prompting a disapproving look from Federal defendant Haight, leading Ms. Case who had already testified, to stumble and say "Can I correct that?" Haight exploded back "What? Yes." Federal defendant Case, followed the Judge's lead, changed her testimony to "Yes, he did" notwithstanding that a moment earlier she attested to no such recollection.
35. Another example of where Federal defendant Haight obstructs justice and interferes with testimony, HP was asked "you have been hit before by your nanny, right." HP responds, "Yes." Haight stated "Wait a minute. Wait a minute." Clearly, Federal defendant Haight coaches witness to change their testimony, obstruction of



justice in violation of the Civil RICO statute codified as 18 U.S.C. 1961, *et seq.*

36. Social worker Case made lengthy inquiries to interrogate and torment an emotionally and mentally unstable child, HP, about Case's fantasies regarding Petitioner's purported sex life; untruths about Petitioner's sex life only served to further alienate an unstable HP from Petitioner.
37. Now, at all times relevant hereto, Patricia Lowe, Deputy County Attorney represented the Petitioners. Patricia Lowe contacted Petitioner's therapists without the written consent of Petitioner in flagrant violation of Health Insurance Portability and Accountability Act of 1996 ("HIPPA").
38. Upon information and belief, Lowe was dismayed by the glowing assessments from the therapists who stood firmly in support of the Petitioner and reunification.
39. On July 31, 2018, Federal defendant Lowe sent an email in which she stated that I called the [Petitioner's] doctors to impose upon the doctors her and the courts "opinions" about the Petitioner as she, the county prosecutor, did not care for the physician recommended conclusion to return the children to the Petitioner," or words to that effect which is not surprising.
40. Petitioner received a notice in court service reports, that the court wishes to adopt out HP and KP and that Petitioner would foot the bill. Social worker Case indicated to Petitioner that the Court was intending to bill Petitioner \$700,000 for court costs. Federal respondent Haight went on the record to state that "her court was financially challenged," or words to that effect.

41.

42. Federal defendant Haight also ordered paternity testing of all three children and while they were present in court, and unfoundedly stated it needed to be determined who fathered the children as Haight implied there had been many men.

43. There was only one father of all three children and that was Jeremy Packwood, the deceased spouse of Petitioner (2007).

44. The oldest child, TP who resisted the coaching, counseling, and coercion more than that of the younger children, being told to lie about Petitioner, was subjected to higher levels of escalated care (punishment and less quality foster care in favor of less desirable group homes residency). TP testified in court transcripts that he was told to tell untruths against Petitioner.

45. The middle child was not as successful in resisting the coaching, counseling, and coercion. He finally admitted he was being coached to testify against Petitioner and finally admitted that he was hit a by a live in nanny and not Petitioner.

46. Petitioner called a witness, Liza Leano R.N., who knows TP, HP, and KP to testify at the hearing. Federal defendant Haight denied Petitioner's Sixth Amendment right to call a witness. Neglect proceedings in Contra Costa County are the equivalent of criminal proceedings.

47. On or about November 18, 2018, "preferred" lawyer Jennifer Ani sent text messages to her respondent, Schindler, advising her "to not push back, agree to a Guardianship, because the case was personal for the Family Court Judge and

- that such Family Court Judge is vengeful.
48. On May 13, 2019, Petitioner made an application to reconsider an April 19, 2019 denial of an application to self-represent (Hon. Thomas Maddock, presiding) which Maddock again denied, another Sixth Amendment violation. Child Protective Services proceedings are likened to a criminal trial.
49. In addition to denying Petitioner her Sixth Amendment right to exercise her choice of counsel and face her accusers, Federal defendant Maddock stated "you make one mention of these matters to the mass media and I am going to have you arrested," or words to that effect. Federal defendant Maddock chilled Petitioner rights to free speech

## **VI. Arguments**

50. In *Lehman v. Lycoming County Children's Servs. Agency*, 648 F.2d 135, 139 (3d Cir. 1981), the Court recognized that habeas corpus has been used in child custody cases in England and in many of the states and that the federal habeas corpus statute authorizing federal court collateral review of federal decisions can be construed to include child custody cases.
51. However, the Court found "reliance on what may be appropriate within the federal system or within the state system to be "of little force" in determining what is appropriate between the federal and state systems. The federal writ should be reserved "for those instances in which the federal interest in individual liberty is so



52. strong that it outweighs federalism and finality concerns."

**A. Next Friend**

53. The term "next friend" is derived from case law construction of the statute which provides that "[a]pplication for a writ of habeas corpus shall be ... verified by the person for whose relief it is intended or by someone acting in his behalf."

54. 28 U.S.C. § 2242 provides:

Application for a writ of habeas corpus shall be in writing signed and verified by the person for whose relief it is intended or by someone acting in his behalf.

It shall allege the facts concerning the applicant's commitment or detention, the name of the person who has custody over him and by virtue of what claim or authority, if known.

55. In the instant application, Petitioner has standing. Petitioner acts on behalf of her children. Petitioner has maintained her parental rights.

56. In the case of HP and KP, "the federal interest in individual liberty is so strong that it outweighs federalism and finality concerns." (see also *Stone v. Powell*, 428 U.S. 465, 478 n.11, 495 n.37 (1976).

57. Thus, Petitioner meets the requirement of "Next Friend," *res ipsa loquitur*.

**B. *Nguyen Da Yen v. Kissinger*, 528 F.2d 1194, 1201 (9th Cir. 1975)**

58. In NDY, the court recognized that it is well established that custodial restraints on a minor child are a sufficient deprivation of liberty to be challenged by way of habeas corpus.

59. The majority of American states accept the English view that a child's absence from



60. the parent's legal custody is equivalent to illegal restraint on the child and that habeas corpus is the appropriate remedy for such restraint. The writ has the capacity to reach all manner of illegal detention. *Harris v. Nelson*, 394 U.S. 286,291 (1969).
61. The overwhelming weight of applicable precedent clearly indicates that federal habeas corpus jurisdiction exists to challenge state child custody judgments. The question is whether federal-state comity considerations render inappropriate the exercise of federal habeas jurisdiction (*Lehman*). Petitioner claims that it is not inappropriate. In the instant application, Petitioner has standing. Petitioner acts on behalf of her children. Petitioner has maintained her parental rights, *res ipsa loquitur*.
62. The issue in cases such as *Lehman* is not who shall have custody of the child or even whether the petitioner-parent's rights should have been terminated, but rather the constitutional sufficiency of the state court proceedings. (See *Pukas v. Pukas*, 129 W. Va. 765, , 42 S.E.2d 11, 13 (1947), *State v. Cheeseman*, 5 N.J.L. 522, 525 (1819)); Note, *supra* note 44, at 272 ("Unless a statute grants the state courts power to change custody in the habeas proceeding, the states follow English practice in limiting the scope of the common law hearing to the question of whether a child is in unlawful custody with reference to a preexisting custody right." Petitioner has maintained her Fourteenth Amendment rights were violated and that the state court proceedings were far from constitutionally sufficient, *res ipsa loquitur*).

**C. Facts are Severe**

63. *Lehman* held that the federalism and finality concerns implicated by such an

64. extraordinary interference with a state's judicial system outweigh the federal interest in liberty in all but cases of special urgency where restraints on liberty are immediate and severe.

65. Petitioner maintains that the facts of the instant application are severe for all the following reasons:

- a. HP now has documented suicidal tendencies in the loss of Petitioner.
- b. Nine year old KP at risk of being sex trafficked in the sex trafficking capital of the world, State of California. For the District Court's benefit, sex trafficking is generally described as

Sex trafficking is human trafficking for the purpose of sexual exploitation, including sexual slavery. A victim is forced, in one of a variety of ways, into a situation of dependency on their trafficker and then used by said trafficker to give sexual services to customers....

66. New Evidence:

- i. Little KP's physicians are alarmed at much higher cholesterol levels in her 2.0 years in foster care;
- ii. KP was arbitrarily retained in 3<sup>rd</sup> grade without parental consent or a Court Order;
- iii. Upon information and belief, KP was rarely taken to school in retaliation for the foster family losing their own biological in a drowning accident shortly before KP was placed and seen as a

hindrance for their own grieving; KP and the biological child were both under the age of 7.

- iv. KP now needs remedial tutoring under the supervision of Petitioner to get back on her grade track in the 2019-2020 school year. The literature and school administrators indicate that retention is more damaging than below average grades.
- v. At a July 12, 2019 visitation, little KP now reports that she is continually being struck by other children in her foster home.
- vi. Petitioner brings bags full of clothes, shoes, and toys to every visitation, but KP reports that her presents are “shared away” to other children; on a July 8, 2109 visit KP was wearing size 9 shoes on her little size 7 foot.

67. The instant application meets the requisite severity or special urgency in child custody cases, *res ipsa loquitur*.

**D. Habeus Corpus is Allowable When Accompanied by a Federal Cause of Action.**

## **VII. FOURTEENTH AMENDMENT - LEGAL STANDARD**

68. Section One of the Fourteenth Amendment to the United States Constitution provides:

[N]or shall any State deprive any person of life, liberty, or property, without due process of law.



69. In the past thirty-five years, the case law reads and is authority that:

- a. It is well settled that parents have a substantive due process right to the custody of their children and, except in emergency circumstances, a procedural due process right to a pre-deprivation child custody hearing;
- b. The Fourteenth Amendment imposes a requirement that except in emergency circumstances, judicial process must be accorded both parent and child before removal of the child from his or her parent's custody may be effected.
- c. "[A] parent may . . . bring suit under a theory of violation of his or her right to substantive due process . . . . Parents have a 'substantive right under the Due Process Clause to remain together [with their children] without the coercive interference of the awesome power of the state.'" (quoting *Tenenbaum v. Williams*, 193 F.3d 581, 600 (2d Cir. 1999) (second alteration in original)); *Cox v. Warwick Valley Cent. Sch. Dist.*, 654 F.3d 267, 275 (2d Cir. 2011); and
- d. "The interest of natural parents 'in the care, custody, and management of their child' is a 'fundamental liberty interest protected by the Fourteenth Amendment.'" (quoting *Santosky v. Kramer*, 455 U.S. 745, (1982)).

70. In stating a claim of a violation of procedural due process, Petitioner alleges:

- a. the existence of a property or liberty interest that was deprived (the biological Mother of the wrongly removed TP, HP, and KP);



b. and (2) deprivation of that interest without due process as a result of witness tampering, obstruction of justice, extortion, and a civil conspiracy to cover it up (the lack of any non-tarnished fact finding hearing since the inception of this matter).

71. In stating a claim of a violation of substantive due process, Petitioner alleges that: (1) she had a valid property or liberty interest (the biological mother of the wrongly removed TP, HP, and KP), and (2) that interest was infringed

72. upon in an arbitrary or irrational manner (the arbitrary allegation of "neglect") contrary to the legal standard of neglect defined as:

Any recent act or failure to act on the part of a parent or caretaker which results in death, serious physical or emotional harm, sexual abuse or exploitation; or

An act or failure to act which presents an imminent risk of serious harm.

(see 42 U.S.C.A. § 5106g, emphasis supplied).

73. Further, Petitioner maintains that, quoting *Tenenbaum*, that removal of TP, HP, and KP "was 'so shocking, arbitrary, and egregious that the Due Process Clause would not countenance it even where it accompanied by full procedural protection.'" *Cox v. Warwick Valley Cent. Sch. Distr.*, 654 F.3d 472 267, 275 (2d Cir. 2011) (quoting *Tenenbaum*, 193 F.3d at 600):

a. So shocking in that TP, HP, and KP had the benefit of a nanny and a handyman, a part time chef at Alameda Yacht Club, who provided fabulous meals from a fully stocked pantry and were whisked

away without notice, Access Order, warrant, or Order of Temporary Removal;

b. So arbitrary according to the definition of "unsanitary conditions" in *Matter of Jennifer B.*, 163 AD2d 910, 558 NYS2d 429 (4th Dept. 1990), *Matter of Pedro F.*, 622 NYS 2d 518 (1st Dept. 1995), *Matter of Billy Jean II* 640 NYS2d 326 (3rd Dept. 1996) that state, in part, maggot infested couch, spoiled food on the floor, urine soaked sheets, children had head lice for over 2 months, home was littered inches deep with garbage and rotten moldy food; and the legal standard of neglect in 42 U.S.C. § 5106g. So arbitrary in the retention of KP in second grade without parental consent or a court order;

c. So egregious in the glaring, flagrant actions of Federal defendants, Child Protective Services brought a neglect petition in less than 12 hours later that relied on the standard of preponderance of the evidence rather than the clear and convincing evidence standard that it was palmed off on Federal respondent Haight who, upon information and belief, rubber stamped the Petition as is customary among the "good 'ole girls club among Child Protective Services, Orinda County Family Court, and the Deputy County Attorney" that caused the removal of TP, HP, and KP.

74. As a result, by a. to c. above, Petitioner has suffered the shock of her conscience, has been horrified, has experienced life changing events, experienced the taking of

75. property (persons) unlawfully and by force in the precious years of her children's lives; such injuries persists to this day.
76. Petitioner had single handedly raised the minor children TP, HP, and KP since the age of 3, 1 ½, and an embryo born in 2010 after the death of Jeremy Packwood, her husband and TP's, HP's, and KP's, father.
77. Emergency circumstances did not exist then and do not exist now to warrant the shocking, arbitrary, and egregious removal of the minor children, TP, HP, and KP, from Petitioner's custody contrary to the legal standard of neglect - it is not even close.
78. In the Matters of TP, HP, and KP, the burden of proof is on the County, and they have not met such burden - it is not even close.
79. TP, HP, and little KP were wrongly removed, and, upon information and belief, the once happy-go-lucky threesome - TP, HP, and KP suffer from fear of parental alienation, suicidal tendencies of HP, and a fascination with the make believe in KP.

### **VIII. Custody**

80. HP and KP are under the direct control of Federal Respondent County, Haight, and Bains', and Packwood as non-biological parents.

### **IX. Prayer for Relief**



WHEREFORE, Petitioner prays that the Court grant the following relief:

1. Assume jurisdiction over this matter;
2. Expedite consideration of this action pursuant to 28 U.S.C. § 1657 because it is an action brought under chapter 153 (habeas corpus) of Title 28;
3. Pursuant to 28 U.S.C. § 2243 issue an order directing Respondents to show cause why the writ of habeas corpus should not be granted; Grant Petitioner a writ of habeas corpus directing the Respondents immediately release HP and KP from custody;
4. Enjoin Respondents from transferring HP and KP outside of this judicial district pending litigation of this matter or removal proceedings;
5. Recover Petitioner's survivors benefits in the amount of \$1,358 per month since absconded with by Federal respondent County;
6. Recover TP's survivors benefits in the amount of \$1,358 per month since absconded with by Federal defendant County;
7. Recover HP's survivors benefits in the amount of \$1,358 per month since absconded with by Federal defendant County;
8. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act (EAJA), as amended, 5 U.S.C. § 504 and 28 U.S.C. § 2412, and on any other basis justified under law; and
9. Grant any other and further relief as the Court deems just and proper.

**Dated: July 18, 2019**  
**Orinda, Cal.**



For Petitioner

/s/ Andrea C. Wood

---

Andrea C. Wood

A handwritten signature in blue ink, appearing to read "Andrea C. Wood". The signature is fluid and cursive, with the first name "Andrea" being the most prominent part.