

In the Superior Court of the State of Arizona  
In and For the County of \_\_\_\_\_

**CV2018-007006**

CIVIL COVER SHEET  
(Please Type or Print)

Plaintiff's Attorney \_\_\_\_\_

Attorney Bar Number \_\_\_\_\_

Is Interpreter Needed? ☐ Yes ☒ No  
If yes, what language: \_\_\_\_\_

MICHAEL R. JAMES, CLERK  
DEP

C. CRUZ, FILED

18 MAY -4 PM 3:55

Plaintiff's Name(s): (List all)

Plaintiff's Address:

Phone #:

Email Address:

David Watson 207 N. La Jolla Blvd Goodyear AZ 85338 (623) 419-2907 DaveCaresforyou@gmail.com

(List additional plaintiffs on page two and/or attach a separate sheet).

Defendant's Name(s): (List All)

Jerrold Steele and Maudie Gomez

(List additional defendants on page two and/or attach a separate sheet)

EMERGENCY ORDER SOUGHT: ☐ Temporary Restraining Order ☐ Provisional Remedy ☐ OSC

☐ Election Challenge ☐ Employer Sanction ☐ Other \_\_\_\_\_  
(Specify)

☐ RULE 8(h) COMPLEX LITIGATION APPLIES. Rule 8(h) of the Rules of Civil Procedure defines a "Complex Case" as civil actions that require continuous judicial management. A typical case involves a large number of witnesses, a substantial amount of documentary evidence, and a large number of separately represented parties.

(Mark appropriate box on page two as to complexity, **in addition** to the Nature of Action case category.)

☐ THIS CASE IS ELIGIBLE FOR THE COMMERCIAL COURT UNDER EXPERIMENTAL RULE 8.1. (Maricopa County only.) Rule 8.1 defines a commercial case and establishes eligibility criteria for the commercial court. Generally, a commercial case primarily involves issues arising from a business contract or business transaction. However, consumer transactions are not eligible. A consumer transaction is one that is primarily for personal, family or household purposes. **Please review Rule 8.1 for a complete list of the criteria.** See <http://www.superiorcourt.maricopa.gov/commercial-court/>. You must check this box if this is an eligible commercial case. **In addition, mark the appropriate box below in the "Nature of Action" case category.** The words "commercial court assignment requested" must appear in the caption of the original complaint.

**NATURE OF ACTION**

(Place an "X" next to the **one** case category that most accurately describes your primary case.)

**100 TORT MOTOR VEHICLE:**

- ☐ 101 Non-Death/Personal Injury  
☐ 102 Property Damage  
☐ 103 Wrongful Death

**110 TORT NON-MOTOR VEHICLE:**

- ☐ 111 Negligence  
☐ 112 Product Liability – Asbestos  
☐ 112 Product Liability – Tobacco  
☐ 112 Product Liability – Toxic/Other  
☒ 113 Intentional Tort

- ☐ 114 Property Damage  
☐ 115 Legal Malpractice  
☐ 115 Malpractice – Other professional  
☐ 117 Premises Liability  
☐ 118 Slander/Libel/Defamation  
☐ 116 Other (Specify) \_\_\_\_\_

**120 MEDICAL MALPRACTICE:**

- ☐ 121 Physician M.D. ☐ 123 Hospital  
☐ 122 Physician D.O. ☐ 124 Other

- 150-199 OTHER CIVIL CASE TYPES:**
- ☐ 131 Account (Open or Stated)
  - ☐ 132 Promissory Note
  - ☐ 133 Foreclosure
  - ☐ 138 Buyer-Plaintiff
  - ☐ 139 Fraud
  - ☐ 134 Other Contract (i.e. Breach of Contract)
  - ☐ 135 Excess Proceeds-Sale
  - ☐ Construction Defects (Residential/Commercial)
    - ☐ 136 Six to Nineteen Structures
    - ☐ 137 Twenty or More Structures

**150-199 OTHER CIVIL CASE TYPES:**

- ☐ 156 Eminent Domain/Condemnation
- ☐ 151 Eviction Actions (Forcible and Special Detainers)
- ☐ 152 Change of Name
- ☐ 153 Transcript of Judgment
- ☐ 154 Foreign Judgment
- ☐ 158 Quiet Title
- ☐ 160 Forfeiture
- ☐ 175 Election Challenge
- ☐ 179 NCC-Employer Sanction Action (A.R.S. §23-212)
- ☐ 180 Injunction against Workplace Harassment
- ☐ 181 Injunction against Harassment
- ☐ 182 Civil Penalty
- ☐ 186 Water Rights (Not General Stream Adjudication)
- ☐ 187 Real Property
- ☐ Special Action against Lower Courts (See lower court appeal cover sheet in Maricopa)

- ☐ 194 Immigration Enforcement Challenge (§§1-501, 1-502, 11-1051)

**150-199 UNCLASSIFIED CIVIL:**

- ☐ Administrative Review (See lower court appeal cover sheet in Maricopa)
- ☐ 150 Tax Appeal (All other tax matters must be filed in the AZ Tax Court)
- ☐ 155 Declaratory Judgment
- ☐ 157 Habeas Corpus
- ☐ 184 Landlord Tenant Dispute- Other
- ☐ 190 Declaration of Factual Innocence (A.R.S. §12-771)
- ☐ 191 Declaration of Factual Improper Party Status
- ☐ 193 Vulnerable Adult (A.R.S. §46-451)
- ☐ 165 Tribal Judgment
- ☐ 167 Structured Settlement (A.R.S. §12-2901)
- ☐ 169 Attorney Conservatorships (State Bar)
- ☐ 170 Unauthorized Practice of Law (State Bar)
- ☐ 171 Out-of-State Deposition for Foreign Jurisdiction
- ☐ 172 Secure Attendance of Prisoner
- ☐ 173 Assurance of Discontinuance
- ☐ 174 In-State Deposition for Foreign Jurisdiction
- ☐ 176 Eminent Domain- Light Rail Only
- ☐ 177 Interpleader- Automobile Only
- ☐ 178 Delayed Birth Certificate (A.R.S. §36-333.03)
- ☐ 183 Employment Dispute- Discrimination
- ☐ 185 Employment Dispute-Other
- ☐ 195(a) Amendment of Marriage License
- ☐ 195(b) Amendment of Birth Certificate
- ☐ 163 Other

(Specify)

**COMPLEXITY OF THE CASE**

If you marked the box on page one indicating that Complex Litigation applies, place an "X" in the box of no less than one of the following:

- ☐ Antitrust/Trade Regulation
- ☐ Construction Defect with many parties or structures
- ☐ Mass Tort
- ☐ Securities Litigation with many parties
- ☐ Environmental Toxic Tort with many parties
- ☐ Class Action Claims
- ☐ Insurance Coverage Claims arising from the above-listed case types
- ☐ A Complex Case as defined by Rule 3(i) ARCP

Additional Plaintiff(s)

Additional Defendant(s)



Person Filing: David DeRosa: Watson

Address (if not protected): 807 N. Lantana Blvd

City, State, Zip Code: Goodyear AZ

Telephone: 623-414-2907

Email Address: Dave Carestonyev@gmail.com

Lawyer's Bar Number: \_\_\_\_\_

Present

Representing ☒ Self, without a Lawyer or ☐ Attorney for ☐ Petitioner OR ☐ Respondent

AUG 29 2018

FILED

LJHpm

CHRIS DEROSE, Clerk

By A. Gonzales  
A. Gonzales, Deputy

SUPERIOR COURT OF ARIZONA  
IN MARICOPA COUNTY

David Watson

Name of Petitioner/Party A  
PROSECUTOR

Case Number: CV-2018-007006

Atlas Number: \_\_\_\_\_

Terrad Jefferson Steele

Name of Respondent/Party B

Title: Addendum to citation and  
Habeas Exhibit Explanation of

Wet Ink Thumb Print to be attached as addendum to  
Amended Claim in this Court of Record: Case #

CV 2018-007006



Paul Jose Romero  
David-Jose Romero-Watson



RECEIVED  
MAR 27 2018

Exhibit E

David Watson for yd @ gmaten

David Watson  
CLERK SUPREME COURT  
Next Friend of Petitioner, Christian Watson  
807 N LaJolla Blvd  
Goodyear, AZ 85338



**IN THE SUPREME COURT OF THE STATE OF ARIZONA**

DAVID WATSON, next friend of:	)	No. <u>HC-18-0013</u>
CHRISTIAN WATSON,	)	
	)	<b>APPLICATION AND PETITION</b>
Petitioner,	)	<b>FOR ORDER FOR</b>
	)	<b>WRIT OF HABEUS CORPUS</b>
vs	)	
	)	[Immediate Relief Demanded, within
Greg McKay, Director, Arizona	)	24-hours as an Emergency]
Department of Child Safety,	)	
	)	[Verified Petition, A.R.S. 13-4121]
Respondent	)	[Judicial Notice, A.R.S. 13-4146]
_____	)	

TO: DUTY JUSTICE, SUPREME COURT OF ARIZONA

COMES NOW the Petitioner, Christian Watson, (a minor) by and through his next friend, David Watson, (his Father, Affiant herein), undersigned, and applies and petitions this Court for its immediate and Emergency Order for the Clerk of said Court to issue out a Writ of Habeas Corpus commanding Greg McKay, Director of the Department of Child Safety, to appear before this Court at such time as the Court shall immediately order and to produce the person of Christian Watson, within 24hrs, as it is believed that the little one in custody is held temporarily at a foster home in Mesa Arizona.

This entire matter is due to a serious defect in the mis-application of the law and the lack of any oversight of DCS, (Department of Child Safety), the refusal of DCS agents, Attorney General's or Agents), and Officers of the Court to allow Due Process, proper service of process, and to disclose Exculpatory evidence in a timely manner. The Petitioner through Affiant believes it is not the duty of an Assistant Attorney General to suppress Exculpatory Evidence in order to help their "client" (DCS) win cases without upholding their oath to support the Constitutions and Laws made in pursuance thereof, and whose purpose is to seek truth and obtain justice. DCS is being allowed to steal little ones with impunity, without over-sight.

[illegible]

- ## The Real Story

David Watson and Brandi Watson, for a short amount of time, believed this story until David Watson asked how the young lady was able to leave her own school and get to the school of T.C.J. when she would have had to travel from her own school. T.C.J. then admitted that she really sent out all the pictures to different young men and didn't want mother and step-father to know;

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well as to call a parent from church that also has a 14 year old son that was sent a picture of T.C.J.;

T.C.J was also prohibited from using any electronic communication devices;

Over the next 12 days, Brandi and David Watson had discussions with T.C.J about self-esteem, self-respect, and the dangers of dealing with the gangster boys who step-father and mother found she was currently dealing with. T.C.J was not abused at all and even was witness by Hal Griffin to walk in the church building on a Wednesday night (see Exhibit 1), after the later claimed time of abuse (January 13<sup>th</sup>, 2017), and on her own walked in and sat next to David Watson and laid her head on his shoulder for comfort while Hal Griffin preached the bible class;

It was at this January 11<sup>th</sup> bible class that David Watson told T.C.J. that she was getting into too much trouble and that she was putting herself into grave danger. The result was T.C.J. being told that she would be starting homeschool;

The following are some of the problems that T.C.J. was having and includes:

- a) T.C.J had the sister of one of the boys she was sending pictures to say that a group of friends were going to jump on (gang fight) T.C.J. while by herself;
- b) T.C.J. also told Step-dad and mother that a boy named Keyshawn was the brother of the girl who wanted to jump her. She also said that her and the boy skipped class and went to a building called the L building and that they started to make out and he put his hands in the pants of T.C.J. and that he made her put her hand in his and that when she was ready to take her hand out that he got extremely angry;
- c) David Watson asked for the young boy's last name and phone number in order to tell on the young man but T.C.J. essentially said that she didn't know his phone number and that she wouldn't be a "snitch." Later, after researching and going through all of the available devices that T.C.J. took, it was found that she had a discussion with a friend that knew of a boy forcing her to do something (see Exhibit 2);
- d) Keyshawn is a boy who had a girlfriend at the same time T.C.J. pursued and skipped class with him and this is the reason for the group of teenage girls wanting to jump T.C.J.;



e) On January 11<sup>th</sup>, 2017 David and Brandi Watson sees that T.C.J. does not correct her problem with lying and sneaking as it was also found in the days before that T.C.J. allows a different boy call her "Nigga," MF, and other vulgar curse words only to send him pictures in her panties and bra she also has multiple frontal pictures she sends out as well of shirt partially pulled up in underwear to various boys and in bra (see Exhibit 3);

f) On the 13<sup>th</sup> of January 2017, approximately 2 days after being told by David and Brandi Watson that T.C.J. would be going to homeschool, T.C.J. made allegations of physical abuse and even created multiple stories of this "so called" abuse (see Exhibit 4). Not only did T.C.J. make two different reports that conflicted in the beginning, she will later be shown to have more stories when speaking with Mike Ives more than a week later;

5. The several conflicting stories left the department and Attorney General's office in the court openly saying that they were looking for "fluidity" when Judge Connie Contes repeatedly asked Jerrod Steele, assistant attorney general to be fair and give over the evidence, which was concealed or suppressed for months;

6. The Department of Child Safety attempted to use only one of these conflicting testimonies to remove the Watson little ones and to create a pick up order and dependency petition with a case without notifying the mother or Father of allegations or hearings;

7. David and Brandi Watson were not served process of service, while the multitude of false stories were hidden/ concealed/ suppressed or obscured from all parties not involved with DCS or Attorney General's office. Between the 13<sup>th</sup> of January and approximately the 25<sup>th</sup> of January, T.C.J. would give vastly conflicting testimonies to Childhelp and possibly the Police, DCS and to Mike Ives, (OCWI worker who was wearing a wire and knew of the first written testimony T.C.J. gave). In the recorded questioning of T.C.J. one could see Mike Ives giving T.C.J. clues to her first story and she denies them or makes other statements that conflict vastly with all other stories told before;

a) T.C.J. in one story makes the claim that her fingernails were injured by David Watson around December 29-30<sup>th</sup>, however in the stolen netbook device, T.C.J. had a picture where she is skipping class in what appears to be someone's basement entitled "What's Class." If one looks closely at the picture, T.C.J. seems to be in a basement and another person is taking the picture. When looking at T.C.J.s hands from the middle of knuckle down, the fingers are red from the



knuckle down (see Exhibit 5a). One of the more telling problems with this picture is that the data saved associated with the picture tells that the picture was saved (see Exhibit 5b) on November 29<sup>th</sup>, a month before T.C.J. claims David Watson injured her fingernails and during the time that she dealt with multiple boys who have shown themselves to be aggressive based on the testimony and social media account communications with at least two people that dealt with T.C.J.;

b) T.C.J. has voiced that multiple people wanted to fight her and that she started to have a bad reputation as people thought of her as a whore. In one document, from one of her many secret social media accounts, there is communication about all the young men that she was dating, or in her words "fucked around with," and talking to. In this document T.C.J. also tells, "they all wanna fight me (see Exhibit 6)." David and Brandi Watson acted as protective parents and wanted to remove T.C.J. from a violent atmosphere that could have become dangerous ;

c) In one of the conflicting stories of T.C.J. she tries to use the 6 year old son of David and Brandi Watson to insinuate that he seen some type of abuse or event. Another problem with this issue is that T.C.J., as shown in one of her accounts (see Exhibit 7), wanted to use this same son as her partner in crime as soon as she could get him to stop "snitching.";

8. OCWI worker Mike Ives, visits and gets evidence that was suppressed;

a) On January 23, after being made aware the Case Workers in Arizona had a common occurrence of lying and making up evidence, David Watson and Brandi Watson decided to get the Watson little ones checked out with a full examination so that should something occur with DCS as mother and father were served with papers from the Father of T.C.J. the document was full of false claims. T.C.J. has a history of making false claims to CPS (3 previous claims unsubstantiated), including her dad, and another accusation before David Watson knew the family;

b) Since she has shown this deceitful pattern, Brandi and David Watson made sure there was documented evidence along the way;

c) On January 23<sup>rd</sup> of 2017, Brandi and David Watson brought the Watson children to be examined by Dr. Steve Garner who is a licensed Arizona Dr., who is also a retired Major in the military as well as a mandated reporter. Dr. Garner, found no signs of abuse and actually gave testimony essentially explaining that he has never seen any signs of neglect or abuse. This interview was witnessed by Hal Griffin and videotaped. Dr. Steve wrote out his findings on paper and it was notarized by Jerry Tolle who is a notary in Maricopa County;



d) On January 24<sup>th</sup> 2017 Mike Ives (OCWI) shows up at the stay-cation which T.C.J. should have been on with the family. He gets a copy of the findings from Dr. Steve Garner (see Exhibit 8) as seen in photo shown later with the Document in his hand. Mike Ives doesn't give any information of what the accusations are and request for Watson's little ones to be brought to a forensic interview and Brandi and David Watson explained that it was important for them to stand on all rights and that T.C.J. had problems with lying and bad behavior before;

e) At this time, Mike Ives had already seen the multiple stories told by T.C.J. as well as the fact that she was caught drunk at school after leaving the care of David and Brandi Watson;

f) Mr. Ives, with his partner Brittany Pinaire both knowingly allowed a Dependency Order and a Pick Up order (see sealed record) to be turned in while withholding Exculpatory Evidence (see Exhibit 9 Unrebutted Affidavit);

g) It seems that Mike Ives and Brittany Pinare (Department of Child Safety) along with Jerrod Steele and Maudi Gomez (Assistant Attorneys General) never had any intention on giving the Exculpatory Evidence (the Affidavit of T.C.J. that Brittany mentions on the phone conversation with David Watson, that Mike Ives also acknowledged seeing in open court during Trial). A picture of this evidence with the one of the original stories withheld by DCS is presented in one of the exhibits;

h) The only reason that David and Brandi Watson were able to see there were two different allegations in the beginning is because the Father of T.C.J. used the first Affidavit T.C.J. presented to childhelp and police (mentioned above) to stop his child support and get full temporary custody;

i) Had Mr. Jones not served Brandi Watson at church, it could have never been known that DCS held more than one allegation, suppressed to carry forward a case;

j) The case worker and OCWI worker both have first-hand knowledge that there are multiple stories given at this time as shown on OCWI workers recorded conversations with T.C.J., which was hidden for months, and the private phone conversation that was recorded by David and Brandi Watson and that was mentioned in the above affidavit, Furthermore, one can see on page 93 of 153 T.C.J. claims to be hit with a "bullet thingy" and in line 8 that she was hit with a gun and told to go to her room. This greatly conflicts with the first hand written affidavit where T.C.J makes it seem that her and David Watson were talking and then somehow she ended up being told to shoot herself. Mike Ives even says at the bottom of the sheet 93 is on, that "...he obviously escalated things a lot." Mike Ives has at this time already seen the Affidavit that T.C.J. has done that was withheld and when she tells him that she was made to hold a big gun to her throat,



he questions her is this was the first time she got in trouble. T.C.J says this is the second time. He then feeds her a story again, he says on page 96 which is connected to 95 of 153 in the Exhibit, "The First time, he asked you to hold a gun to your throat?" she again says "The second time I got in trouble..." On page 101 of 153, there is even more confusion. Line 11 she says "He just said put the gun in your mouth," yet in the report to DCS, she first says David Watson forced her to her knees and placed his gun in her mouth. In one of the reports (see sealed record) the case worker essentially says David Watson showed erratic behavior as it is "alleged" he shoved his gun in Step-daughters' mouth. This shows that her first story to one fabrication, as revealed to one worker is that a gun was forced into her mouth. This doesn't make sense as both of these allegations were known to exist at the same time, yet DCS only shows the first one. In line 15 of page 101 of 153 T.C.J, claims that she "thought" that maybe he was gonna make me kill myself when he walked back in.... she now is placing David Watson as not in a room with her. After Mr. Ives attempted to ask if she recalled anything about when the gun was in her mouth, referring to taste or smell, she then claims that no gun was in her mouth it was just on her lips so there wasn't much of a flavor she guesses (page 102 connected to 101 in this photo), she then goes on to say, "Just smelled like my mom's room, I think." These stories make no sense and it can be easily seen to bolster the Departments case when left out. Viewed together these conflicting stories remove the possibility that any of these stories can be true(see Exhibit 10);

k) This evidence is also shown in the court reports given on two different days where one says one allegation, and the other says a different allegation, yet the documents both essentially say that "after further investigation, T.C.J. continued to report the above statement is still valid and true..." as if the story never changed on the bottom, showing obvious conflicted stories as the grounds for petition (see Exhibit 11a and 11b);

l) What makes these matters worse is this change was made after David Watson notified case worker and Assistant Attorneys General of potential liability based on the Baca case. Furthermore, David Watson informed the parties that a case worker could not use known perjured testimony in order to bring forth certain outcomes based on the 9<sup>th</sup> Circuit (Hardwick) case;

m) After showing where there were multiple stories, the court report following (7/25/17 report as Exhibit 11b above) then changes the allegation (see exhibit 12, May 08, 2017 email to parties);

n) Not turning in exculpatory evidence while trying to remove little ones is a trespass on the mother and fathers' rights and the constitution as well as case law which shows these practices are prohibited by case workers, investigators and police officers;



o) The maxim of law that fraud vitiates everything is not to be ignored by workers of DCS, Assistant Attorneys General and case workers. This is a felony and also problematic for the court in obtaining jurisdiction;

p) The following controlling cases prohibit the very actions that have happened in this case:

### **Controlling Case Law:**

In TROXEL V. GRANVILLE (99-138) 530 U.S. 57 (2000); 137 Wash. 2d 1 969 P. 2d 21, affirmed. United States Supreme Court Justice Susan B. O'Connor and others held:

The Fourteenth Amendment provides that no State shall "deprive any person of life liberty, or property, without due process of law." We have long recognized that the Amendment's Due Process Clause, like its Fifth Amendment counterpart, "guarantees more than fair process." *Washington v. Glucksberg*, 521 U.S. 702, 719 (1997). The Clause also includes a substantive component that "provides heightened protection against government interference with certain fundamental rights and liberty interest." *Id.*, at 720; see also *Reno v. Flores*, 507 U.S. 292, 301-302 (1993)

**The liberty interest at issue in this case-the interest of parents in the care, custody, and control of their children is perhaps the oldest of the fundamental liberty interest recognized by this Court. More than 75 years ago, in *Meyer v. Nebraska*, 262 U.S. 390, 399, 401 (1923), we held that the "liberty" protected by the Due Process Clause includes the right of parents to "establish a home and bring up children" and "to control the education of their own." Two years later, in *Pierce v. Society of Sisters*, 268 U.S. 510, 534-535 (1925), we again held that "liberty of parents and guardians" includes the right "to direct the upbringing and education of children under their control."** We explained in *Pierce* that "[t]he child is not the mere creature of the State; those who nurture him and direct his destiny have the right, coupled with the high duty, to recognize and prepare him for additional obligations." *Id.*, at 535. We returned to the subject in *Prince v. Massachusetts*, 321 U.S. 158 (1944), and again confirmed that there is a constitutional dimension to the right of parents to direct the upbringing of their children. "It is cardinal with us that the custody, care and nurture of the child reside first in the parents, whose primary function and freedom include preparation for obligations the state can neither supply nor hinder." *Id.*, at 166. In subsequent cases also, we have recognized the fundamental right of parents to make decisions concerning the care, custody, and control of their children. See, e.g., *Stanley v. Illinois*, 405 U.S. 645, 651 (1972) ("It is plain that the interest of a



parent in the companionship, care, custody, and management of his or her children 'come[s] to this Court with a momentum for respect lacking when appeal is made to liberties which derive merely from shifting economic arrangements' " (citation omitted)); *Wisconsin v. Yoder*, 406 U.S. 205, 232 (1972) ("The history and culture of Western civilization reflect a strong tradition of parental concern for the nurture and upbringing of their children. This primary role of the parents in the upbringing of their children is now established beyond debate as an enduring American tradition"); *Glucksberg, supra*, at 720 ("in a long line of cases, we have held that, in addition to the specific freedoms protected by the Bill of Rights, the 'liberty' held that, in addition to the specially protected by the Due Process Clause includes the right... to direct the education and upbringing of one's children" (citing *Meyer* and *Pierce*)). In light of this extensive precedent, it cannot now be doubted that the Due Process Clause of the Fourteenth Amendment protects the fundamental right of parents to make decisions concerning the care, custody, and control of their children." **[Emphasis Added]**;

"Where rights secured by the Constitution are involved, there can be no rule making or legislation which would abrogate them." *Miranda v. Arizona*, 384 U.S. 436, 491

When a social worker's RECKLESS DISREGARD or conscious indifference deprives someone of his or her protected liberty interest, that social worker violates the Constitution, regardless of whether the social worker is a supervisor or subordinate. Authority: *Starr v. Baca* (9th Cir. 2011) 652 F.3d 1202, 1207, citing *Sandra T.E. v. Grindle* (7th Cir. 2010) 599 F.3d 583, 591;

A person who makes a false statement, under penalty of perjury, with a RECKLESS DISREGARD or conscious indifference of the truthfulness of the statement and consciously avoids verifying whether the statement is true, is deemed to have knowledge of the falsity of the statement.

Authority: *United States v. Evans* (5th Cir. 1977) 559 F.2d 244, 246;

A witness must have PERSONAL KNOWLEDGE of the subject matter of his or her testimony. Authority: Cal. Evid. Code, §702(a);

"PERSONAL KNOWLEDGE" means: knowledge gained or perceived through firsthand observation or experience, i.e., through exercise of the witness' own senses; a belief based on what someone else has said does not constitute personal knowledge. Authority: KNOWLEDGE (Personal Knowledge), Black's Law Dictionary (10<sup>th</sup> ed. 2014); Cal Evid Code, § 170; Cal. Evid. Code, §702(Law



Revision Commission Comments (1965));

Due process is obstructed when social workers commit fraud on the courts. Authority: *N Mariana Islands v. Bowie* (9th Cir. 2001) 243 F.3d 1109, 1125;

A parent's constitutional rights are violated when a social worker obtains a court order through "distortion, misrepresentation and[/or] omission." Authority: *Malik v. Arapahoe Cnty. Dep 't of Soc. Servs.* (10th Cir. 1999) 191 F.3d 1306, 1316;

A social worker cannot reasonably believe that he or she is acting lawfully in making false statements to the juvenile court. Authority: *Marshall v. County of San Diego* (2015) 238 Cal. App. 4th 1095, 1113;

Juvenile proceedings, based on misrepresentation and omission, do not constitute notice and an opportunity to be heard. Authority: *Malik v. Arapahoe Cnty. Dep't of Soc. Sen's.* (10th Cir. 1999) 191 F.3d 1306, 1315;

The Constitution guarantees the right to be free from the presentation of false, perjured, and/or fabricated evidence, and the withholding of known EXCULPATORY EVIDENCE, by government officials during judicial proceedings. Authority: *Napue v. Illinois* (1959) 360 U.S. 264, 269; *Pyle v. Kansas* (1942) 317 U.S. 213, 216; *Mooney v. Holohan* (1935) 294 U.S. 103 112; *Greene v. Camreta* (9th Cir. 2009) 588 F.3d 1011, 1034-1035, vacated in part by *Camreta v. Greene* (2011) 131 S.Ct. 2020, 2036; *Devereaux v. Abbey* (9th Cir. 2001) 263 F.3d 1070, 1074-1075;

To support an § 1983 cause of action based on a claim of deception upon judicial officers by a social worker, the plaintiff must show that the social worker deliberately or in RECKLESS DISREGARD of the truth, made false statements or omitted EXCULPATORY EVIDENCE that was MATERIAL to the findings of the juvenile court. Authority: *Greene v. Camreta* (9th Cir. 2009) 588 F.3d 1011, 1035, vacated in part by *Camreta v. Greene* (2011) 131 S.Ct. 2020, 2036;

Plaintiff need only prove Defendants knew, or reasonably should have known, their allegations were false; it is not necessary to further prove the Defendants made the allegations with the specific intent to deceive the court. Authority: *United States v. Reilly* (2d Cir. 1996) 76 F.3d 1271, 1280; *Franks v. Delaware* (1978) 438 U.S. 154, 155-156;



RECKLESS DISREGARD for the truth may be inferred when a social worker knows that important factual information exists, but omits the information. Authority: *Chism v. Wash. State* (9th Cir. 2011) 661 F.3d 380, 388; *United States v. Reilly* (2d Cir. 1996) 76 F.3d 1271, 1280;

A social workers acts with a RECKLESS DISREGARD for the truth when omissions and false statements contained in a document were all facts that were within that social worker's personal knowledge. Authority: *Chism v. Washington* (9th Cir. 2011) 661 F.3d 380, 388 ("The most common sense evidence that the officers acted with at least a reckless disregard for the truth is that the omissions and false statements contained in the affidavit were all facts that were within [the officer's] personal knowledge."). The fact that false statements and omissions all bolstered the government's case for removal and detention of the child, suggests that the social worker's conduct was intentional or reckless - and not the product of mere negligence. Authority: *Chism v. Wash. State* (9th Cir. 2011) 661 F.3d 380, 388 ["A reasonable factfinder could also find that the officers acted recklessly or intentionally because the false statements and omissions contained in the affidavit all bolster the case for probable cause, which suggests the mistakes were not the product of mere negligence"];

9. Proof of Fraud is given to the Parties and Court Yet no Equal Protection;

a) On multiple occasions David Watson showed the Evidence of Mike Ives taking evidence and refusing to turn it in to the Court, (see exhibit 13 Mike with Steve Garner Document in hand). After showing this evidence in an open hearing, David Watson asked Judge Connie Contes if she was going to report this to the proper authorities or going to punish the parties involved, in front of witnesses, essentially claimed that she is not the police (please see sealed record). This caused David and Brandi Watson to further understand this was not an impartial process and there is no oversight to the obvious and documented crimes of DCS and that the judge didn't mind ignoring the multiple wrongs in this case, even when she herself had to rebuke the Department of Child Safety and their Assistant Attorney General Counsel;

b) Aimee Youngblood, Guardian Ad Litem, has acknowledged through (See Exhibit 14) email to Aimee Youngblood) email that she has seen court documents filed in the court. These documents showed fraud upon the court, multiple conflicting stories and other such crimes. There is also an email replay to her reply showing the origin of these documents given by David Watson. There has been no disciplinary action to anyone or know reports on these crimes by Aimee



Youngblood of which David Watson is aware. However, Aimee Youngblood had no problem choosing to make a motion to sever rights after the man presiding as Judge named Scott McCoy decided he wanted to sever and adopt, though all parties knew of the fraud upon the court. No rules or legislation can allow for official to remove a constitutional or fundamental right and a statutes cannot be used to cloak a fraud;

10. Letters were sent to Sheriff Penzone, Doug Ducey, Presiding Judge and Greg McKay but not one has made any response, (Exhibit 15);

11. Affidavits have been sent to Brittany Pinaire and Aimee Youngblood as well and not one Affidavit was rebutted, (Exhibit 16);

12. A call was made to the State Ombudsman to reveal all the fraud happening in this case. The woman essentially told David Watson to go back and talk to the case worker holding the case;

13. There is neither oversight nor anyone, or other location to get justice when DCS and Attorney General(s) decide to abuse the law for other reasons not disclosed;

14. Next friend, Affiant herein has exhausted all remedies available for his little ones and without any other avenue seeks this Application and Petition for an Order to issue for a Writ of Habeas Corpus.

WHEREFORE, Affiant moves the Court to issue and enter an Order granting Affiant's Application and Petition for an Order to issue a Writ of Habeas Corpus, and to issue and enter an Order to:

a) Acknowledge, support and enforce United States Supreme Court Justice Susan B. O'Connor and others who held in Troxel v. Granville (99-138) 530 U.S. 57 (2000); 137 Wash. 2d 1 969 P. 2d 21:

**"The liberty interest at issue in this case-the interest of parents in the care, custody, and control of their children-is perhaps the oldest of the fundamental liberty interest recognized by this Court. More than 75 years ago, in Meyer v. Nebraska, 262 U.S. 390, 399, 401 (1923), we held that the "liberty" protected by the Due Process Clause includes the right of parents to "establish a home and bring up children" and "to control the education of their own." Two years later, in Pierce v.**



**Society of Sisters, 268 U.S. 510, 534-535 (1925), we again held that “liberty of parents and guardians” includes the right “to direct the upbringing and education of children under their control.”;**

b) Reunify the minor child with his Parents for any cause this Court has upon reviewing the sealed records, in camera, obtaining evidence being withheld by Respondent or his Agents, or examining T.C.J. to determine the inconsistencies of her fabricated stories to cause termination of parental rights;

c) Grant further and additional relief as this Court deems necessary based upon the obvious destruction of the family in this case.

And further Affiant says not.


RESPECTFULLY SUBMITTED this 27 day of March, 2018

  
By David Watson, next friend for Petitioner, CHRISTIAN WATSON

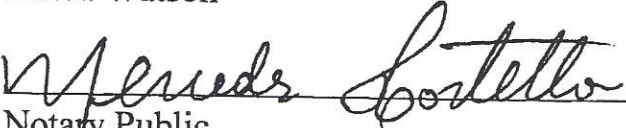
VERIFICATION

STATE OF ARIZONA     )  
  ) ss:  
County of Maricopa     )

I, David Watson, Affiant herein, states the facts above are true and correct, and any statement made upon information or belief otherwise is believed to be true and correct.

  
\_\_\_\_\_  
David Watson  
Next Friend of Petitioner, Christian Watson  
807 N LaJolla Blvd  
Goodyear, AZ 85338

SUBSCRIBED AND SWORN to before me this 29<sup>th</sup> day of March, 2018, by  
David Watson

  
\_\_\_\_\_  
Notary Public

12/10/ 2019  
My commission expires on:

This instrument is a full, true and correct  
copy of the original on file in this office.

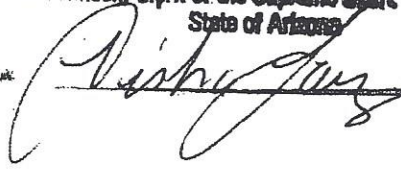
April 26, 2018  
\_\_\_\_\_  
Met Johnson, Clerk of the Supreme Court  
State of Arizona  
 Deputy



Exhibit E [Confirmed]

HC-18-0013

RECEIVED

MAR 27 2018

CLERK SUPREME COURT

FILED

MAR 27 2018

JANET JOHNSON  
CLERK SUPREME COURT  
BY:

Exhibit "1"

The foregoing instrument is a full, true and correct copy of the original on file in this office.

ATTEST March 29, 2018  
Janet Johnson, Clerk of the Supreme Court  
State of Arizona

By Chika Gay Deputy

## Affidavit

Comes now Affiant, Halbert Griffin, declaring the following to be true: After sitting in on the court hearings and learning of the allegations in this case there are things that make me question the validity of the allegations. My family and the Watson family would regularly stay after services and talk. I personally would talk to Taylor every time I would see her. We would talk and laugh together about many things. I on a Wednesday in mid-January 2017 I tried to talk to her and she was not in her normal talking mood. I asked her what happened to her ankle and why it was wrapped and she said that sometimes I hurt myself. When they (the Watson family) were all loaded in the car to go home, I opened the car door to play with the kids and Taylor asked me to please close the door because she was cold. This was something that I did regularly which usually was an occasion of laughter, but this time Taylor was not in a good mood and she didn't want to talk. What is confusing to me is that up until this point, she was the same pleasant happy girl I had seen her become over the years. I don't understand how these accusations could be made about a man that she would lean her head on his shoulder in services and horse play with him after services just like the rest of the Watson children. These events took place even days before the last time that I saw her on that Wednesday in mid-January. In court the Attorney for the court said that the event in question happened in late December 2016. But up until the last day that I saw her, she was still leaning, hanging and hugging on David Watson. It doesn't make sense that she would do that with a person that has done something as horrible to her as has been alleged.

An Affidavit unrebutted stands as Truth.

affidavit uncontested unrebutted unanswered [United States v. Kis, 658 F.2d 526, 536 (7th Cir. 1981); Cert. Denied, 50 U.S. L. W. 2169; S. Ct. March 22, 1982 1982]

"Allegations in affidavit in support of motion must be considered as true in absence of counter-affidavit." [Group v Finletter, 103 F. Supp. 327 Federal case of Group v Finletter, 108 F. Supp. 327]

"Indeed, no more than affidavits is necessary to make the prima facie case." [United States v. Kis, 658 F.2d 526, 536 (7th Cir. 1981); Cert. Denied, 50 U.S. L. W. 2169; S. Ct. March 22, 1982]

AFFIDAVIT. A written or printed declaration or statement of facts, made voluntarily, and confirmed by the oath or affirmation of the



party making it, taken before an officer having authority to administer such oath. Cox v. Stern, 170 Ill. 442, 48 N.E. 906, 62 Am.St.Rep. 385; Hays v. Loomis, 84 Ill. 18. A statement or declaration reduced to writing, and sworn to or affirmed before some officer who has authority to administer an oath or affirmation. Shelton v. Berry, 19 Tex. 154, 70 Am.Dec. 326, and In re Breidt, 84 N.J.Eq. 222, 94 A. 214, 216.

affidavit uncontested un rebutted unanswered - [United States v. Kis, 658 F.2d 526, 536 (7th Cir. 1981); Cert. Denied, 50 U.S. L. W. 2169; S. Ct. March 22, 1982 1982] "Indeed, no more than affidavits is necessary to make the prima facie case." [United States v. Kis, 658 F.2d 526, 536 (7th Cir. 1981); Cert. Denied, 50 U.S. L. W. 2169; S. Ct. March 22, 1982]

affidavit uncontested un rebutted unanswered Morris v National Cash Register, 44 S.W. 2d 433 Morris v National Cash Register, 44 S.W. 2d 433, clearly states at point #4 that "uncontested allegations in affidavit must be accepted as true."

affidavit uncontested un rebutted unanswered Morris vs. NCR, 44 SW2d 433 Morris v National Cash Register, 44 SW2d 433: "An Affidavit if not contested in a timely manner is considered undisputed facts as a matter of law."

Non Rebutted Affidavits are "Prima Facie Evidence in the Case,--

"United States vs. Kis, 658 F.2d, 526, 536-337 (7th Cir. 1981);

"Indeed, no more than (Affidavits) is necessary to make the Prima Facie Case." -- Cert Denied, 50 U.S. L.W. 2169; S.Ct. March 22, 1982.

"Uncontested Affidavit taken as true in support of Summary Judgment."

-- Seitzer v. Seitzer, 80 Cal. Rptr. 688

"Uncontested Affidavit taken as true in Opposition of Summary Judgment." -- Melorich Builders v. The SUPERIOR COURT of San Bernardino County (Serbia) 207 Cal.Rptr. 47 (Cal.App.4 Dist. 1984)

"Silence can only be equated with fraud where there is a legal or moral duty to speak, or where an inquiry left unanswered would be intentionally misleading. . . We cannot condone this shocking behavior... This sort of deception will not be tolerated and if this

is routine it should be corrected immediately." -- U.S. v. Tweel, 550 F.2d 297, 299. See also U.S. v. Prudden, 424 F.2d 1021, 1032; Carmine v. Bowen, 64 A. 932.

#### Verification

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States, and by the provisions of 28 USC section 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge,

information and belief. Executed in AVCOWDALE, Arizona this

26 day of MARCH, 2018.

Halbert Griffin  
Halbert Griffin

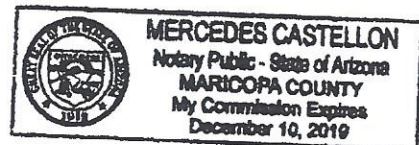
#### Notary

On this 26<sup>th</sup> day of March, 2018; before me Mercedes Castellon the subscriber, affiant, personally appeared to me know to be the living man described in and who executed the foregoing instrument and sworn before me that he executed the same of his free will act and deed.

Mercedes Castellon  
Notary

My Commission Expires: 12/10/2019

(Notary Seal)





CHRIS DEROSE, CLERK  
BY *A.M. Valenzuela* DEP  
A. VALENZUELA, FILED  
18 NOV 16 PM 4:30

In The Watson Court  
At People Public Courthouse  
201 West Jefferson, Phoenix AZ 85003

Case Number Correct  
Caption Variation Noted

A Private for profit governmental services Corporation

STATE OF ARIZONA - DUN AND BRADSTREET )  
#072459266 )  
ARIZONA DEPARTMENT OF CHILD SAFETY )  
Dun and Bradstreet #078291672 ) Case # CV2018-007006  
Private registered legal business entities, subsidiaries ) JD: JD33746  
subsidiary corporations of UNITED STATES Corporation )  
Two De Facto for profit Gov. Services Corporations )

VS

David Jose Romero Watson, dba  
An artificial entity created through fraud, and  
Unlawful Conversion of natural Name by the State of Arizona the man being  
deprived of property and liberty, appearing By special appearance of David  
Jose Romero; of family of Watson, A Living Soul, A man of GOD,  
Bondservant of Christ, Non Personam, Sui Juris a Non-representative/Non-  
agent

CC: US Army Provost Marshal General Notified in Writing

CC: US Commerce Secretary Notified in Writing

U.S.C. Title 18 §242: Deprivation of Rights Under Color of Law

---

This is a Living Testimony in form of an Affidavit; a  
Challenge of my Rights, Status, Standing & Jurisdiction;  
a Notice of Discovery of Fraud and Impropriety; Return  
of Biological Property;  
a Demand for Remedy; and a Claim for Compensation

at the Peoples Public Court  
201 West Jefferson Phoenix AZ 85003

David Watson  
Prosecutor

Wrongdoer(s)  
Terrod Jefferson Steele  
Greg McKay

Case#: CV 2018-007006  
Addendum to Challenge of Rights, ~~Standing~~  
standing and Jurisdiction;  
Thumb Print (Web Ink)

I require that this seal be the seal for the challenge  
of rights, standing and jurisdiction document  
sent to be filed by mail on October 15, 2018.

I will verify in open court all herein be true.

CHRIS DEROSE, CLERK  
BY  
K. WHITSON, FILED  
18 OCT 18 PM 4:13



David Jose Romero  
David Jose Romero Watson