

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA

Helena DIVISION
(You must fill in this blank. See Instruction F)

MAR 26 2020

Clerk, U.S. Courts
District of Montana
Helena Division

Amber J. Williams

(Write the full name of each plaintiff who is filing this complaint. Each named plaintiff must sign the complaint.)

Plaintiff,
-against-

"see attached"

(Write the full name(s) of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. The names listed in the above caption must be identical to those contained in Section II. Do not include addresses here and do not use et al.)

Defendants.

Case No. _____
(to be filled in by the Clerk's Office)

COMPLAINT
(Pro Se Non-Prisoner)

Jury Trial Demanded: Yes No
(check one)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to

Pro Se Non-Prisoner Complaint Form
Plaintiff's Last Name Williams

(Revised April 2016)
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RESPONDENT/DEFENDENT LIST

Department of Family Services

Child Protection Specialist

Candice Osterman

Department of Family Services

Child Protection Specialist

Emily McVey

Department of Family Services

Child Protection Specialist

Jake Westerhold

AYA Youth Dynamics Group Home

AYA Youth Dynamics Group Home

Staff Member, Chris (last name Unkown)

AYA Youth Dynamics Group Home

Staff Member, Kevin (last name Unkown)

Shodair Children's Hospital

Provo Canyon School

Honorable Judge Kathy Seeley

District Court Family Judge

Deanna Lougee

Adult Probation and Parole Officer

Department of Corrections Adult Probation and Parole

Jennifer Hedke

Therapist

Acadia Montana Group Home

Acadia Montana Group Home Facility

Heather C.

Staff Member

Acadia Montana Group Home

Brittany Turner

Child Protection Specialist

Department of Family Services

Karen Galvin, Therapist and Case Manager

Acadia Montana

Castle Pines Group Home

Terry Murray
Therapist
Cornerstone Counseling

Jolene and Landon VanVulkenburg
Foster Placement

Karen Kane
Lawyer

Carmen Underwood
Lawyer



INSTRUCTIONS

1. Use this form to file a civil complaint with the United States District Court for the District of Montana. Include only counts/causes of action and facts – not legal arguments or citations. You may attach additional pages where necessary. Your complaint must be typed or legibly handwritten in ink and on white paper. Write on only one side of the paper. Do not use highlighters and do not staple or otherwise bind your papers. All pleadings and other papers submitted for filing must be on 8 ½" x 11" paper (letter size). You must sign the complaint (see page 8). Your signature need not be notarized but it must be an original and not a copy. The Clerk's Office cannot provide you copies of documents in your file without prepayment of \$0.10 per page (for documents electronically available) or \$0.50 (for documents not electronically available). Please keep a copy of the documents you send to the Court.
2. The filing fee for a complaint is \$350.00 plus a \$50.00 administrative fee for a total of \$400.00. This amount is set by Congress and cannot be changed by the Court. If you pay the filing fee, you will be responsible for serving the complaint on each defendant and any costs associated with such service.
3. If you are unable to prepay the entire filing fee and service costs for this action, you may file a motion to proceed in forma pauperis.
4. Complaints submitted by persons proceeding in forma pauperis must be reviewed by the Court before defendants are required to answer. *See* 28 U.S.C. § 1915(e)(2). The Court will dismiss your complaint before it is served on defendants if: (1) your allegation of poverty is untrue; (2) the action is frivolous or malicious; (3) your complaint does not state a claim upon which relief may be granted; or (4) you sue a defendant for money damages and that defendant is immune from liability for money damages. After the Court completes the review process, you will receive an Order explaining the findings and any further action you may or must take. The review process may take a few months; each case receives the judge's individual attention. Plaintiffs should not serve defendants, pursue discovery, or request entry of default judgment prior to the completion of this review process.
5. The case caption (page 1 of this form) must indicate the proper Division for filing. The proper Division is where the alleged wrong(s) occurred. When you have completed your complaint, mail the *original* of your complaint and either the full filing fee or your motion to proceed in forma pauperis to the proper Division:

Billings Division: *Big Horn, Carbon, Carter, Custer, Dawson, Fallon, Garfield, Golden*

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Plaintiff's Last Name Williams

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Valley, McCone, Musselshell, Park, Petroleum, Powder River, Prairie, Richland, Rosebud, Stillwater, Sweetgrass, Treasure, Wheatland, Wibaux, and Yellowstone Counties

U.S. District Court Clerk, 601 2nd Avenue North, Suite 1200, Billings, MT 59101

Butte Division: *Beaverhead, Deer Lodge, Gallatin, Madison, and Silver Bow Counties*
U.S. District Court Clerk, 400 N. Main, Butte, MT 59701

Great Falls Division: *Blaine, Cascade, Chouteau, Daniels, Fergus, Glacier, Hill, Judith Basin, Liberty, Phillips, Pondera, Roosevelt, Sheridan, Teton, Toole, and Valley Counties*
U.S. District Court Clerk, 125 Central Ave. West, Great Falls, MT 59404

Helena Division: *Broadwater, Jefferson, Lewis & Clark, Meagher, and Powell Counties*
U.S. District Court Clerk, 901 Front St., Ste 2100, Helena, MT 59626

Missoula Division: *Flathead, Granite, Lake, Lincoln, Mineral, Missoula, Ravalli, and Sanders Counties*
U.S. District Court Clerk, P.O. Box 8537, Missoula, MT 59807

I. Parties to this Complaint

A. Plaintiff

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Amber J. Williams</u>
Street Address	<u>P.O. Box 6871</u>
City and County	<u>Helena, Lewis and Clark County</u>
State and Zip Code	<u>Montana 59604</u>
Telephone Number	<u>406 235 0502</u>
E-mail Address	<u>fshnqueen987@gmail.com</u>

B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an

individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both.

Defendant No. 1:

Name Candice Osterman

Job or Title Child Protection Specialist (if known)

Street Address 2024 9th Ave

City and County Helena, Lewis and Clark

State and Zip Code Montana 59601

Telephone Number 406 444 2717

E-mail Address Costerman@mt.gov (if known)

Individual capacity Official capacity

Defendant No. 2:

Name Emily McVey

Job or Title Child Protection Specialist (if known)

Street Address 2024 9th Ave

City and County Helena, Lewis and Clark

State and Zip Code Montana 59601

Telephone Number 406 444 2030

E-mail Address emcvey@mt.gov (if known)

Individual capacity Official capacity

Defendant No. 3:

Name Jake Westerhold

Job or Title Child Protection Specialist (if known)

Street Address 2024 9th Ave

City and County Helena, Lewis and Clark

State and Zip Code Montana 59601

Telephone Number 406 444 2030

E-mail Address _____ (if known)

Individual capacity Official capacity

Defendant No. 4:

Name Kathy Seeley
 Job or Title District Court Judge (if known)
 Street Address 228 Broadway St.
 City and County Helena, Lewis and Clark
 State and Zip Code Montana, 59601
 Telephone Number 406 447 8209
 E-mail Address _____ (if known)

Individual capacity Official capacity

(NOTE: If more space is needed to furnish the above information, continue on a blank sheet labeled "APPENDIX A: PARTIES").

II. Basis for Jurisdiction

Check the option that best describes the basis for jurisdiction in your case:

- Federal Question:** Claims arising under the Constitution, laws, or treaties of the United States. This includes claims brought under 42 U.S.C. § 1983 against state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]."
- U.S. Government Defendant:** United States or a federal official or agency is a defendant. This includes claims brought against federal employees under *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971)
- Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.

III. Venue

This court can hear cases arising out of the District of Montana. Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district.

Please explain why venue is appropriate in this Court:

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Plaintiff's Last Name Williams

APPENDIX A: PARTIES

Acadia Montana

55 Basin Creek Road

Butte, Montana 59701

406-496-6300

(FACILITY MAY BE PERMENANTLY CLOSED)

Castle Pines Group Home

2540 Castle Pines Way

Great Falls, Montana 59405

406-268-1985

Jolene and Landon VanVulkensburg

Foster Placement Caregiver

218 W. 2nd Avenue

Boulder, Montana, 59632

Karen Kane

Supervising Attorney, Child Protection Unit

2677 Palmer St. Suite 300

Missoula, Montana, 59808

406-329-1564

KKane2@mt.gov

Carmen Underwood

Lawyer

CUnderwood@mt.gov

Deanna Lougee

Adult Probation and Parole Officer

Department of Corrections Adult Probation and Parole

111 N. Rodney Street

Helena, Montana 59601

406-444-2482

Jennifer Hedke

Therapist

Acadia Montana Group Home

55 Basin Creek Road

Butte, Montana 59701

Jennifer.hedke@acadiahealthcare.com

406-496-6300

Acadia Montana Group Home Facility

55 Basin Creek Road

Butte, Montana 59701

406-496-6300

(FACILITY MAY BE PERMENTLY CLOSED)

Heather C.

Staff Member

Acadia Montana Group Home

55 Basin Creek Road

Butte, Montana 59701

406-496-6300

Brittany Turner

Child Protection Specialist

Department of Family Services

700 Casey Street

Butte, Montana 59701

Brittany.Turner@mt.gov

406-496-4950

AYA Youth Dynamics Group Home

Staff Member, Chris (last name Unkown)

105 Venture Way

Boulder, Montana 59632

406-225-4600

AYA Youth Dynamics Group Home

Staff Member, Kevin (last name Unkown)

105 Venture Way

Boulder, Montana 59632

406-225-4600

Shodair Children's Hospital

2755 Colonial Drive

Helena, Montana 59601

406-444-7500

Provo Canyon School

4501 N. University Avenue

Provo, Utah 84604

800-848-9819

IV. Statement of Claim(s)

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph.

A. Count I:

1. What federal constitutional or statutory right(s) do you claim is/are being violated by defendants? *Deprivation of ~~some~~ civil rights by torturous intervention of a mother/child relationship, enslavement by a government entity, terrorism by government entity, interference of civil and constitutional rights, violations of parenting rights, Robbery by a government entity, parental alienation.*
2. What date and approximate time did the events giving rise to your claim(s) occur?

3/2016 to 2/2019

3. Supporting Facts: (Include all facts you consider important, including names of persons involved, places, and dates. Describe what happened without citing legal arguments, cases, or statutes).

Please see ~~attached~~ attached "Affidavit of Amber Williams"

4. Defendants Involved: (List the name of each defendant involved in this claim and specifically describe what each defendant did or did not do to allegedly cause your injury).

all defendants in this claim aided Ms. Candice Osterman, CPS in all of these violations against my self. Brittany Turner for mishandling

(NOTE: For each additional claim, use a blank sheet labeled "APPENDIX B. STATEMENT OF CLAIMS." You must address paragraphs IV(A)(1-4) for each count., following the directions under IV.

AFFIDAVIT OF AMBER WILLIAMS

STATE OF MONTANA

LEWIS AND CLARK COUNTY

1. I, Amber Williams, am over the age of 18 and a resident of the State of Montana. I have personal knowledge of the facts herein, and, if I am called to testify completely thereto.
2. 03/2016: My 3 children, H.N.R. (10/12/2003), A.R.R. (04/30/2006), and N.L.R. (09/17/2007), were removed from their biological father Christopher Rasmussen's care in Clancy, Montana, Jefferson County, by Child Protection Specialist Candice Osterman. Approximately one to two weeks after removal, C.P.S. Becca Averill called me to inform me of the removal and that my children had been placed into kinship care with their paternal grandmother, Kim Rasmussen. I had no prior knowledge to the children being removed. Upon this call C.P.S. Becca Averill falsified my testimonies to keep the children inside state care. I was moving into a new home and could not pick my children up in that moment and felt they were safe in the care of their paternal grandmother's home until that process was completed. Ms. Becca Averill placed on recorded documents that I was not capable to take the children and stated that I couldn't mentally handle it and felt that they were fine in their grandmother's care.
3. 03/2016-07/2016: I, Amber, provided C.P.S. Candice Osterman, with multiple certificates of completion of parenting classes, domestic violence courses, stress and anger management class, as well as urine analysis and sweat patch drug testing (which continued until January 2018 when I finally refused any more and every result was negative

- from the beginning). These actions of mine were in play upon verbal agreement before the courts entered into a treatment plan under Judge Tucker's Court in Boulder, Montana to satisfy Ms. Osterman in this case and matter. I also participated in a mental health evaluation with Holly Gomez (Helena, MT) and a chemical dependency evaluation with Art Becker (Helena, MT). I called weekly and partook in on-site visits at the Department of Family Services building Helena, MT). I never missed a phone call or visit during this time. I kept Ms. Osterman well informed at all times. Never did I show any signs of instability in any way. I was never allowed to see my kids without supervision even though I was the non-offending parent in the situation with no charges against myself. My brother, Ricky Williams J.R., helped transport me to and from all visits and took part in visiting with the children as well from 03/2016-07/2016.
4. 08/2016-10/2016: I took a trip to Texas to see my youngest daughter. I had informed Ms. Osterman of this trip a month in advance. My kids knew I was taking this trip as well and that I would be back. With the idea that eventually when all was said and finished with Ms. Osterman's investigation against their father that I would in fact move with my children to Texas and settle down there to give my kids a fresh start from the abuse they were forced to go through. The kids were excited. Ms. Osterman told me that once I got to Texas just to keep contact with her for the case because she could enter the children into an Interstate Compact that would allow the children to transfer to Texas with me so that this change could take place. During my forced extended stay in Texas at this time due to C.P.S. Candice Osterman having contact with C.P.S. James Levi Gibbs, I was forced to live in a tent outside of my mother's home. Ms. Osterman told James Levi that I was a threat to my children and couldn't be in the home or around my daughter alone without supervision, even though I am the non-offending parent in the matter. I had several phone calls to Ms. Osterman during my trip to Texas, where I was denied all contact with my children. We had no phone calls, no skype, no video chat, thereby causing parental alienation.

5. 03/2016-01/2017: I was forced to be denied my mothering rights to my children even though I had done nothing wrong and proved on every aspect that I was able and stable to provide for my children. The horrible abuse of parental alienation from my three children continued from 08/2016 to 12/2016.
6. 12/07/2016- Ms. Osterman admitted under oath in Judge Tucker's Court, Boulder, Montana, Jefferson County, that she had been parentally alienating me from my children. During this admittance, Judge Tucker was livid with the department due to the lack of services that Ms. Osterman refused to provide my children and I with. Judge Tucker ordered that Ms. Osterman provide me with stable housing, gas funds, visitations, and a telephone so that I could have proper support. In which, Ms. Osterman, in fact never complied with, for those supportive services for my family's reunification. My mother, Beverly Ashley, purchased my phone for me.
7. 12/21/2016-Ms.Osterman and I had court in Boulder, Mt but Ms. Osterman didn't show up, instead she went to my son's Christmas Play. Later that day, I received a phone call from Ms. Osterman that there is an emergency at the school with my son (9). She stated that my son was making threats of killing himself. She followed protocol to take him to the ER for observation. Upon transporting, she placed my child in her front seat of her vehicle. I was fearful due to witnessing Ms. Osterman almost causing a 3 car pile-up on the off-ramp due to driving recklessly. When I confronted Ms. Osterman about her behavior she sought to blame my son for being frazzled and distracted by the situation. Ms. Osterman admitted that she felt she has caused my child's fragile state of mind by giving him false hope. My mother, Beverly Ashley was a witness to this behavior and was with me inside my vehicle to meet Ms. Osterman at the ER with my son.

8. 03/2016-03/2017: All three of the children in question, H.R., A.R., and N.R., were all deprived of therapeutic services thru the departments child protection specialist, Candice Osterman. She did not put no effort toward helping the children transition thru their traumatic experiences of abuse and neglect by their father nor for their traumatic and devastating removal from their father's home. She allowed the kinship placement, Kim Rasmussen, to do as she pleased with the children and did not enforce a reunification process.

9. 01/2017-03/2017: I got my visits back due to the previous court hearing with Judge Tucker. Kinship placement began to fail. Ms. Osterman wanted to place my kids in group homes. I protested against this. There was no need considering I had proved all of my safety and stability, time and time again to Ms. Osterman without hesitation. During one of my visits with my kids at the department building with C.P.S. Judy present my oldest son out of nowhere disclosed that their grandfather, Kenneth Rasmussen, had days prior whooped all 3 of the children with a 2 by 4 piece of wood. I became furious. C.P.S. Judy called Candice Osterman to take H.N.R.'s report on the situation. At the next visit with the children at the department, H.N.R. had reported that his grandmother had threatened his life if her husband got taken away by cops on the matter.

10. 03/2016-07/2017: Ms. Osterman placed all three of the children in my home during a "TRIAL" home visit. We were forced to have a very rough beginning due to lack of therapeutic services and forced parental alienation by C.P.S. Osterman. This lack of, caused the children and I to be very stressed out. Ms. Osterman opinionated my children to have medical diagnoses due to her previous affiliations to Shodair Children's Hospital but denied my children the care they deserved. Leaving me very overwhelmed and in emotional and mental distress but, I never backed down or gave up. After placement, I was forced to overwork myself with no help from the department to get my children the care they deserved and prove that I could manage whatever life and Ms. Osterman threw at me as being a single mother. I never faulted, showed

weakness or vulnerability. We attended therapy 5 days a week with Cathy Curry, which caused extreme emotions and the kids to leave the rooms or not partake in sessions. We had in-home care with The Dan Fox Program, which caused severe behavioral outbursts. I felt very violated and scrutinized inside my own home. I worked a full-time job as a Certified Nursing Assistant, traveled to and from my children's schools 2 to 4 times a day providing prompt and prominent care to my kids individually without any help from C.P.S. Osterman, Ms. Osterman was literally in my home every 2 weeks plus visiting my kids weekly at their schools making them very uncomfortable and uneasy in their educational environments. Upon enduring emotional exhaustion between my children and myself, I allowed all of us to take a mental break for several weeks, as I seen was the proper thing to do for each child's best interest without causing any more trauma and damage to their development and growth. Ms. Osterman did not like that I did this to protect my children's mental and emotional stability. I was not allowed to have any type of friendships without the approval of Ms. Osterman. Ms. Osterman sought to seek background checks on every person I had contact with, even though, I am the non-offending parent in the matter. Ms. Osterman treated me like I was a criminal. I went to work one evening and sought a friend of mine of 23 years, Brittne Fleck and her boyfriend, Daylon Khul to watch my children on a spur of the moment notice due to getting called into work that evening. My kids have known her their entire lives and call her auntie. I let her use my vehicle for transporting the kids because it was big enough to fit all the kids with proper seat restraint and I felt safe with them inside the vehicle at all times. I get a call at work to retrieve my children or Ms. Osterman would in fact remove them from my care. Ms. Osterman had recognized my vehicle and followed it to the home of which my kids were being baby sat at, approximately 3 blocks from my place of employment. Ms. Osterman admitted she had followed my vehicle to the premises. She proceeded to tell me that my friend could not watch my children because she was on probation and had a few years' prior given her child up for adoption (not due to of abuse or neglect to the child). Ms. Osterman never mentioned that my friend was not a threat

to my children or that my children had not been harmed in any way shape or form by my friend. Ms. Osterman stated that she didn't want my children involved with these 2 people unless I was physically there. I got my kids and left, being forced to miss a several days of pay from work due to this situation and being forced to find another babysitter. Ms. Osterman proceeded to tell me that she lived very close to the vicinity of the home and would frequently drive by to make sure I was not present there, therefore intimidating my children, myself, and my friends and their home.

11.06/27/2017: I took my children to Spring Meadow Lake in Helena, Mt. During this hot summer day, I recovered the lifeless body of a 7-year-old boy out of the lake. My children were present and witnessed this traumatic event. This day my kids showed true heroism even though the boy did not survive. My kids were able to see life in an entirely different light. This is the same day that I had met my now husband, John Stob. Daylon Khul and Brittnie Fleck were also at the lake with us.

12.07/2017-07/2017: Helena, Mt experienced a severe earthquake. In the early morning hours of July 07,2017 I took my children, John Stob, and myself to Mr. Khuls home as Mr. Khul had invited us out to the lake for a birthday party. Mr. Khul had split up with my friend Brittnie and had invited us out to a birthday party at the lake. Brittnie had left some of her belongings at the home including her nieces' toys, as she frequently baby sat them. I thought this would be a fantastic thing to do with the kids cause they all needed to get the traumatic event out of their heads and this would give them some play time to just be kids and enjoy their summer vacation out of school. As I was preparing myself for the leave to the lake, all four of my kids were outside playing, as kids do. I looked out the window to see Ms. Osterman's work vehicle and her starring at my friend's home. I began loading my belongings into my vehicle as I didn't need them any longer and I was preparing to leave for the party with my children, Mr. Stob, and Mr. Khul as well. Ms. Osterman was assisted by many local law enforcement officers and Deanna Lougee, a

probation officer. Upon the contact between Ms. Osterman and I, Amber, I asked Ms. Osterman if she had tried to locate my whereabouts or tried calling my working cellphone number to make contact with me and the kids and she blatantly stated no she did not. She immediately sought out Mr. Khul's home instead of reaching out. The attending parole officer, Deanna Lougee and her team proceeded searched Daylon Khul's home. In this search they found a bottle of naproxen (Tylenol) and an unused scale. C.P.S. Jake Westerhold authorized Ms. Osterman to remove all 4 of my children from my care based on physical neglect because Mr. Khul had a possessions charge from when he was 18 years old and was on probation during this time. Thus, forcing me to become an offending parent even though there was no physical abuse, physical neglect, or imminent danger taking effect to the children's well-being or physical being. This same day Ms. Osterman proceeded to get into a car accident with all four of my children inside of her work vehicle (HP173492). Law enforcement was called to the scene. Amongst these four children, I had my daughter N.M. removed from my care for no cause at all, as she was not a part of the original case involving Ms. Osterman, my other 3 children, nor their father in question's case or concern. All of the children were with me, their biological mother and never left my care nor were never left alone in the home with Mr. Khul or with Mr. Stob. The scale was never tested by the department but Ms. Osterman presumed it was for marijuana. The following day Ms. Osterman ordered all 4 of my children to be forced to undergo hair follicle testing and myself as well. All of those results came back negative. Ms. Osterman proceeded to place and keep my kids in foster placement and forced into state group home placements without merits. Ms. Osterman took it upon herself to tell the foster placement, Lori Hankinson, that I, Amber was a big time drug dealer. Even though that was not the truth at all. During the time my children were with me, I had purchased 2 cell phones for my son on different occasions. Ms. Osterman took these cell phones from my son and bugged them with a tracking application so that she could have constant monitoring on his whereabouts as he was contacting me and she would use the app. to follow me around town for approximately 2 to 3 weeks after removal of

my kids. During this time of being harassed, stalked, and entrapped by Ms. Osterman, her findings came back completed, as negative toward the allegations and opinions she had about me. I was a good tax paying, law abiding citizen, and productive member of society. Still to this day, these items have never been returned to my possession.

13.08/2017-: I ended up in the hospital with a blood clot caused by having knee surgery from an injury in 2015. During this hospital stay, I was diagnosed with stress cardiomyopathy heart failure with a left ventricle ejection fraction of 35%. This specific diagnoses is also known as broken heart syndrome. Ms. Osterman knew about my diagnosis and I kept her fully aware of what I was going thru and that I had many medical follow ups. I began to see Britt Ballinger, cardiologist in Helena, Mt. Upon many medication regimes and cardio follow-ups, I had no significant change in my health. I proceeded to ask Britt at one of my appointments if by chance the stress from the court case could be impacting my health, Dr. Britt Ballinger replied with it sure isn't beneficial and that the added stress was not good for my heart health.

14.07/2017-08/2018: Judge Kathy Seeley ordered the continued removal of my youngest child, N.M. based on my other 3 children's case with their father, Christopher Rasmussen in which had nothing to do with my daughter, N.M. or myself in the matter, as Christopher was not her father. Even though there was no physical abuse, physical neglect, or imminent danger to my child. Adult Probation Officer, Deanna Lougee, testified in this court that there were multiple children present at the multiple family rearing apartment complex on California Street, Helena, Mt. and that there were children's toys and women clothing in the home where the children were removed from, so she presumed that they were mine. She also testified that she did have knowledge that Mr. Khul and Ms. Fleck were not together any longer and that Mr. Khul's previous roommate, Mr. Cody Rowlan no longer lived in the home but in

the same complex as Mr. Khuls home. Therefore, giving Ms. Osterman the presumption that I was living in Mr. Khuls apartment when she knowingly on multiple occasions had been to my place of residence in which I owned. Judge Seeley then okayed the removal of my child without any abuse because Cody had left 1 medication behind of naproxen(Tylenol) sitting on a side table and an unused scale in which all testimonies coincided with the fact that it was not tested and that it was presumed for marijuana. Shortly, after N.M. removal, Ms. Osterman began to weed through each one of my children one by one, placing them all in group home placements and foster care placements. I was forced by the state to watch my children be violated, terrorized, and traumatized by state child protection specialist, Ms. Candice Osterman. A state employee that had stepped all over my parental rights on many occasions. During these extensive forced placements, I watched my children endure the most horrific types of abuses that a parent could ever be forced to witness and watch. It was horrifically traumatizing for me as well as their parent. It was happening to my babies by the people who were supposed to protect them but instead tortured them. I watched physical abuses to H.R. at AYA Youth Dynamics, Boulder, MT., N.R. at Acadia Montana, Butte, Mt, and N.M. at Acadia Montana, Butte, Mt, and sexual rape on N.R. at Castle Pines Group Home, Great Falls, Mt. Chemical restraints took place on N.M. at Acadia Montana in Butte, Mt and N.R. at Acadia, Montana in Butte, Mt, by force with Candice Osterman's approval. Emotional abuse A.R., N.R., N.M. and H.R. by all placements involved, mental abuse on A.R., N.R., N.M., H.R. by all placements involved, and parental alienation on H.R., N.M., A.R., N.R., and myself at the hands of C.P.S. Candice Osterman and all placements involved. I was forced to be enslaved by Candice Osterman, C.P.S. I was forced to be terrorized by the horrific scenery of N.M. and N.R. blaming themselves for what Ms. Osterman was doing to our family. I was haunted by seeing N.M., and N.R. being covered in bruises from being held in restraint holds at Acadia Montana in Butte, Mt. H.R. at all placements and N.R. at Acadia Montana in Butte, Mt were cutting up their arms from being forced to endure such physical mental and emotional torture on the departments behalf with no one stepping in to

save my babies except me. Ms. Osterman continued to traffic my children to and from facilities and placements. I was tormented mentally, emotionally, and physically by Ms. Osterman's removal of my oldest son, H.R. from my grandmother Carol Rose's home and forced into out of state placement at Provo Canyon School in Provo Utah, for invoking his freedom of speech about the abuse taking place to himself by the department and group home staff members. Ms. Osterman did not inform no legal parties (Mariah Eastman (my attorney) Brenda Wahler (H.R. attorney) or Suzy Combs (CASA)) about her actions involving H.R.'s move out of state, giving no legal counsels time to fight for H.R. to stay in Montana. Ms. Osterman inflicted threats of federal criminal charges upon myself, Amber, if I had shown up to the airport to see my son away. Ms. Osterman knew about all of these abuses and never interfered for my children's safety, well-being, or best interests. Ms. Osterman hated that I fought for my children the way that a mother is supposed to while complying with her wants in the matter. Ms. Osterman knew that I was to hold her fully accountable for the abuses happening to my children because I regularly contacted her about the matters and my legal counsel, Mariah Eastman and CASA, Suzy Combs as well. Ms. Osterman would take it upon herself to make severe decisions against my wishes such as forcing all 4 of my children to get the flu shot. Even though I had protested against this due to medical concerns of egg allergies and having a medical field education, Ms. Osterman, made my children get it anyways. Then she would have my visits taken away from my children if I brought these concerns to her attention. Ms. Osterman refused to allow cooperation with me because I was very stern, firm, and naturally loud voiced when it came to my children being hurt and my rights being violated. I became a threat to Ms. Osterman and intimidated her with knowing my rights as a parent. Ms. Osterman hated this about me because I would not back down from her. I made Ms. Osterman only contact me thru email form so that my lawyer, Mariah Eastman, and CASA, Suzy Combs could be involved in the threads, so there was no way that Ms. Osterman could get away with the abuses toward myself and my family. Well, I refused to release my address to her due to her abuse, stalking, and harassment toward

myself and my family. My husband whom Ms. Osterman had known about but never confirmed the relationship between us was profiled and discriminated against based on his passed history not his rehabilitations and successes for his criminal charges, that do not involve women or children. My husband, John Stob, agreed and complied with Ms. Osterman's request of compliance and agreed to enter into a treatment plan agreement way before Ms. Osterman profiled and discriminated against him. John provided Ms. Osterman with all of his certificates of achievements from many state programs. John also witnessed all of the abuse the children and I was forced to endure by the hands of C.P.S. Candice Osterman. John and I both partook in the state approved parenting class called, The Circle of Security. This was John's first approach to this course but my second course, as at the beginning of the case I, Amber, participated in this class at the YWCA in Helena, Mt. We did this class with Mr. Matt Furlong. My youngest daughter, N.M. was in a serious physical injury in which I was not notified about by the group home, Acadia Montana nor by Ms. Osterman, C.P.S., CASA Suzy Combs was present during this event. Upon learning of the life changing event that caused my daughter, N.M. to have a broken jaw at the hands of state employees, I demanded another x-ray take place due to the amount of swelling to my child's face. Ms. Osterman replied with a denial of further medical care because I was not a physician. My child's face was unrecognizable and severely scarred. I called the Board of Visitors to report the abuse from Acadia Montana to report the abuse of a broken jaw by a staff member, Heather C. (last name unknown) against my daughter N.M. I also contacted the Department of Family Services of Butte, MT. C.P.S. Brittany Turner in Butte, Mt, took the investigation and never called in replies to our concerns nor followed up with any of N.M.'s medical needs or abuse by Acadia Montana in Butte, MT. During the entire time my children were forced out of my home, I provided each child with multiple letters, cards, candies, clothing, toys, family photos, blankets, and holiday gifts. I also had daily to weekly emails sent to all the children's individual group home placement therapists, Candice Osterman C.P.S., Suzy Combs CASA, Mariah Eastman, my lawyer during all of the events that I am recording hereto and

therein, with all of my concerns. A.R. was forced to live in the home of her abuser, Christopher Rasmussen for several months where I was continually denied any type of contact with her. I sent money on gift cards to her that she never received. Throughout this entirety of involvement, the father, Christopher Rasmussen, a convicted child abuser, drug dealer, drug user, multiple time offender, violent crimes against women and his children, was incarcerated and then took part in a 4 to 6-month prerelease program. He was allowed to have full contact and visits with A.R., H.R., and N.R. at Ms. Osterman's commands. While I, the mother and non-offending parent had to beg, plead, cry, and sweat, comply, and be treated like a criminal to see my children. I had my visits taken away with A.R. by therapist, Terri Murray because A.R. couldn't control her excitement and emotions when it came to visiting with me. A.R. foster placement, Jolene and Landon Van Vulkenburg, allowed A.R. and I one 1-hour phone call then I was never to speak with A.R. again. A.R. was allowed full contact with her abuser. When I asked Ms. Osterman about this behavior she replied to me that she was not going to force the foster caregivers to follow the reunification process with me. She didn't want them to be uncomfortable. While N.R. was forced into Castle Pines Group Home in Great Falls, Mt, I was denied all contact for 6 months and did not know where my son was placed. During N.R.'s forced placement he was raped by an older male child (J.P.). When N.R. disclosed the information to staff member Rachel, N.R. was shipped to another facility for explicit outbursts and the group home wanted to label him as a sexual offender at 9 years old when he was a victim. Ms. Osterman refused me contact and all involvement with my children until I completed therapeutic counseling for part of my treatment plan, even though I had done absolutely everything she asked and was the non-offending parent. At one point in time, with my mother, Beverly Ashley, present, we met with Ms. Osterman at the Department for a meeting. Ms. Osterman stated that it was never her intentions to reunify my children with me but to put them back into the home of Christopher, their father, a convicted child abuser, because she removed the kids from him.

05 / 2018
15. ~~02~~/2018-02/2019: I proceeded with care thru LCSW, Louie Blood. Little did Mr. Blood know what he was getting into. After he heard and read about my case and story, he was disgusted with Ms. Candice Osterman and the group home placements in which she had forced my children to go to. Each week I cried so hard about my children's pain and suffering. Louie was appalled with the state. I showed true care and concern, with full mental, emotional, and physical stability. Mr. Blood agreed that there was a lot of abuse of power in this case and my family would need time for healing from what has taken place to us. Mr. Blood knows every inch of this case as much as the victims do and the state workers that were all involved as well, from beginning to end. I asked Mr. Blood in email for his professional opinion about this case being the cause of my heart failure and he stated it was a very stressful case and was not helpful to my heart failure.

16. 08/2018-09/2018: N.M. was placed inside my home 08/02/2018. Upon being placed in my home approximately 2 weeks later, 6 weeks after her injury N.M. was in severe pain, the break was revealed by ER physicians at St. Pete's Hospital in Helena, Mt and had been healing for at least 6 weeks and was fusing to the bone inside of her mouth which was exactly to the date of injury. I was forced to provide further medical care for my daughter, N.M. based on the recommendations and results provided by medical professionals. N.M. has to have continued medical care out of town with a maxillofacial and dental surgeon to this day due to injury. August 10, 2018 N.R. was forced into the home of his abuser, Christopher Rasmussen, biological father after being released from Acadia Montana, Butte, Mt. After N.R.'s release, I tried to contact Chris on multiple occasions to make contact with my son. I was refused contact and was treated very horrifically by Christopher when it came to having contact. I was called very dehumanizing and belittling graphic names. In which, I recorded with my lawyer, Mariah Eastman, CASA Suzy Combs, Louie Blood LCSW, Ms. Osterman C.P.S. Then, on August 17, 2018, I received a very frantic call from Christopher to come to Butte,

Mt to pick N.R. up from his home because N.R. didn't want to live with Christopher. I immediately went to grab my son. Upon my arrival, N.R.'s face was red and tears were pouring down his cheeks. Christopher was acting very high strung and throwing N.R.'s clothing into my vehicle. I emailed my lawyer, Mariah Eastman and Casa Suzy Combs to inform them of what was taking place. When I pulled away from Christopher's vehicle, I had noticed a red cut mark on N.R.'s face and asked what had happened. N.R. had explained that Cassandra, Christopher's wife, had smacked him across the face with her rings on her fingers because he didn't want to do the dishes. I immediately reported this to C.P.S. Candice, where she investigated the cut on his face and took pictures, then she left N.R. inside my home. 09/27/2018: H.R. was supposed to be released to Christopher's care. I very strongly disagreed with this placement due to his extensive history of crime, drugs, and abuse against the children. H.R. was released to my care because of the situation that involved his little brother, N.R. just a week prior to H.R.'s release. None of the lawyers had agreed with Ms. Osterman's decision on this as well. 09/2018: I received a phone call from Candice Osterman to pick up A.R. from Butte Middle School in Butte, MT, as her father Christopher had not been providing care for and to her. Christopher had left A.R. for several days with his wife Cassandra, without being present, due to his addictions. I traveled to Butte, Montana and picked up my daughter from Cassandra's care. During retrieving A.R.'s belongings Cassandra was being verbally aggressive toward A.R. and had her belongings prepacked in suit cases. The items were very roughly put into containers and unorganized and unzipped in the suit cases. My mother, Beverly Ashley was present during this interaction. I then left and brought her home.

17.12/2018- My husband, John Stob and I, Amber Williams, N.M.'s parents and guardians, had applied for SNAP benefits and Medicaid for Nevaeh through The Office of Public Assistance in Helena, Montana. We were informed by intake specialist, Heather Mitton, that from August 2018 to December 2018, there had been \$1500.00 a month taken from Nevaeh's

case. These funds were being obtained by C.P.S. Candice Osterman for foster care relief even though Nevaeh had been in my home and care since August 2018. Intake specialist, Heather Mitton, confirmed that she had no idea where these funds were going and to whom they were going to but they could not be located. I had provided all of the necessary documents to Heather to prove that Nevaeh had been in my home and care during the time this money was being taken from her account. Heather reported this to her superior in the chain of command. Heather spent several days trying to contact C.P.S. Candice Osterman to get to the bottom of this to locate the money and to release the benefits for N.M., C.P.S. Candice never returned the calls. I, Amber, sent out emails for approximately a week on this matter to my lawyer, Mariah Eastman and CASA, Suzy Combs. CASA, Suzy Combs, was finally able to get ahold of Emily McVey, C.P.S. Candice's supervisor. We were all very confused on where this money was going since I was not receiving it and Nevaeh had been in my home during the times that the money was reported missing. Shortly after this report was made, C.P.S. Candice was finally removed from the case.

18.12/2018: After 3 years of complaints against C.P.S. Candice Osterman to (C.P.S. Supervisor) Emily McVey, Jennifer Hoerhauf (C.P.S. Southwest Regional Supervisor), Marti Vining (C.P.S. Administrator), Suzy Combs (CASA), Sheila Hogan (DPHHS Director), Laura McCullough (Complaints and Critical Incident Manager) and the states ombudsman, without any prevailing responses to Candice Osterman's unethical misconduct and unprofessional handling of the case, she was finally removed. C.P.S. Candice Osterman had been replaced with C.P.S. Kara Seyler.

19.12/2018-02/2019: C.P.S. Kara Seyler followed thru with her home visits as required by law and closed the case within 30 days of being placed as the protection specialist on the case. Ms. Seyler put in her motions to Judge Berger's Court, in Boulder, Mt, Jefferson County to have the case dismissed and closed.

15.02/14/2019: I was awarded full custody of A.R., H.R., N.M. by Judge Berger, Boulder, Montana, Jefferson County, to supersede any and all existing court orders.

I declare that under penalty of perjury, to the best of my knowledge and belief, that all the information provided herein is true, correct, and complete.

Amber G. Williams 3/6/20

H.R. Placement List

03/2016-03/2017

Kinship Placement- paternal grandmother, Kim Rasmussen and paternal grandfather, Ken Rasmussen, Helena, Mt

03/2017-07/2017

"Trial" home placement- biological mother, Amber Williams, Helena, Mt

07/2017-07/2017

Foster placement- Lori Hankinson, Helena, Mt

07/2017-12/2017

Group Home Placement- Acadia Montana, Butte, Mt

12/2017-12/2017

Group Home Placement- AYA Youth Dynamics, Boulder, Mt

12/2017-01/2018

Group Home Placement- Shodair Children's Hospital, Helena, Mt

01/2018-01/2018

Kinship Placement- maternal great grandmother, Carol Rose, Helena, Mt

01/2018-04/2018

Group Home Placement- Provo Canyon School, Provo, Utah

04/2018-09/2018

Group Home Placement- Ottawa House, Aware INC. Butte, Mt

09/2018- Current

AWARDED FULL CUSTODY- Biological mother, Amber Williams, Helena, MT

A.R. Placement List

03/2016-03/2017

Kinship placement- paternal grandmother, Kim Rasmussen and paternal grandfather, Ken Rasmussen

03/2017-07/2017

"TRIAL" home placement- biological mother, Amber Williams

07/2017-10/2017

Kinship placement- paternal aunt, Amanda Rasmussen

10/2017-10/2017

Foster caregiver- Casey, personal friend of CPS worker, Candice Osterman

10/2017-12-2017

Kinship placement- maternal great aunt, Sherryl Hennings House

12/2017-05/2018

Foster caregiver- Jolene and Landon VanVulkensburg

05/2018-09/2018

Forced Placement- biological father, Christopher Rasmussen, convicted child abuser

09/2018-current

Awarded Full Custody- Biological mother, Amber Williams

N.R. Placement List

03/2017-03/2017

Foster Kinship Placement- paternal grandmother, Kim Rasmussen and paternal grandfather, Ken Rasmussen, Helena, Montana

03/2017-07/2017

"Trial" home placement - biological mother, Amber Williams, Helena, Montana

07/2017-07/2017

Foster Placement- Lori Hankinson, Helena, Montana

07/2017-12/2017

Group Home Placement- Castle Pines Group Home, Great Falls, Montana

12/2017-09/2018

Group Home Placement- Acadia Montana, Butte, Montana

09/2018-09/2018

Forced Placement- Biological father, Christopher Rasmussen, A convicted child abuser

09/2018- current year 2020

Awarded Full Custody- Biological mother, Amber Williams

N.M. Placement List

07/2017-07/2017

Foster placement- Lori Hankinson, Helena, Montana

07/2017-01/2018

Group Home Placement- Acadia Montana, Butte, Montana

01/2018-03/2018

Group Home Placement- Lewis and Clark House Aware INC., Helena, Montana

03/2018-04/2018

Group Home Placement- Shodair Children's Hospital, Helena, Montana

04/2018- 08/2018

Group Home Placement- Acadia Montana, Butte, Montana

08/2018- 02/2019

"TRIAL" in-home placement- Biological mother, Amber Williams

02/2019- current

Awarded Full Custody- Biological mother, Amber Williams

Amber Williams Witness List

1. Brenda Wahler, child lawyer
montanabw@mt.net
2. Suzy Combs, CASA
suzycombs@msn.com, 406-565-0194
3. Honorable Judge Tucker, Boulder, MT, Jefferson County
4. Honorable Judge Berger, Boulder, MT, Jefferson County
5. Mariah Eastman, attorney at law, mother's lawyer
info@eastmanlawoffices.com,
6. Beverly Ashley, maternal grandmother
940-366-2945
7. Carol Rose, maternal great grandmother
406-443-3027
8. Louie Blood, LSCW, Therapist
406-465-2288

Amber Williams Witness List Continued

9. Matt Furlong, Parenting Class Instructor

406-202-0544

10.Nicole Palmer, CASA

406-439-6317

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive. (Do not cite legal arguments, cases, or statutes). Attach additional pages if needed. *Stress, emotional abuse, mental abuse, Defamation of character, invasion of privacy, parental alienation, enslavement by a government entity, terrorism by a government agency, Robbery by a government entity, intimidation, harassment, stalking, entrapment, retaliation, victimization, emotional distress, mental distress, kidnapping, misconduct, mishandling, pain and suffering, deprivation of civil rights by torturous intervention of mother/child relationship, wrongful removal, negligence, interference of constitutional rights, malicious interference of parental rights, fear, post traumatic stress, exploitation, failure to protect, denial of parental rights, denial of legislative reunite programs, denial of supportive services, used unsubstantiated reports to gain custody of children, exclusion of parental involvement, abuse of power, falsified testimonies*

I sought therapy on my own 7/2018 to 2/2019

(NOTE: If more space is needed to furnish the above information, continue on a blank sheet labeled "APPENDIX C: INJURY").

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims. *Ms. Osterman to be relinquished of her duties as a child protection specialist. All defendants involved need to be held to the highest accountability of their actions in this case. I will be asking the Courts for monetary compensations for all of the above listed and for future trauma that will haunt me forever. NO PARENT shall ever have to be forced to endure what I went through. Justice needs to be served for myself and my children involved in this case. For just my personal claim I ask the Courts to enter compensation of \$14,000,000. I do believe all entities should be convicted in a court of law for their involvement*

(NOTE: If more space is needed to furnish the above information, continue on a blank sheet labeled "APPENDIX D: REQUEST FOR RELIEF").

VII. Plaintiff's Declaration

A. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

B. I understand I must keep the Court informed of my current mailing address and my failure to do so may result in dismissal of this Complaint without notice to me.

C. I understand the Federal Rules of Civil Procedure prohibit litigants filing civil complaints from using certain information in documents submitted to the Court. In order to comply with these rules, I understand that:

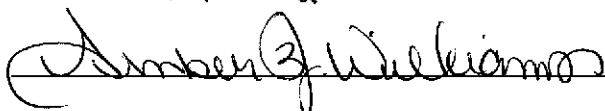
- social security numbers, taxpayer identification numbers, and financial account numbers must include only the last four digits (e.g. xxx-xx-5271, xx-xxx5271, xxxxxxxx3567);
- birth dates must include the year of birth only (e.g. xx/xx/2001); and
- names of persons under the age of 18 must include initials only (e.g. L.K.).

If my documents (including exhibits) contain any of the above listed information, I understand it is my responsibility to black that information out before sending those documents to the Court.

I understand I am responsible for protecting the privacy of this information.

D. I understand the submission of a false statement or answer to any question in this complaint may subject me to penalties for perjury. I declare under penalty of perjury that I am the Plaintiff in this action, I have read this complaint, and the information I set forth herein is true and correct. 28 U.S.C. §1746; 18 U.S.C. §1621.

Executed at 5893 Shooter Dr on 3/12, 2020.
(Location) Helena, mt (Date) 5600

Signature of Plaintiff: 

Printed Name of Plaintiff: Amber J. Williams