

In the Court of Common Pleas in Butler, Pennsylvania

Plaintiff: PRO SE

Case Number 20-10638

Cheyenne Louise Goodin

Vs.

Defendants:

Gilbert Smith; Butler, Pa CYS;

Butler, Pa. Domestic Relations;

Butler, Pa. Public Defender's Office;

Butler, Pa. District Attorney;

County of Butler, Pa.

Attorney Bobette Roper Magnusen

Attorney Amy Burton

(Additional Individuals not listed within their own Individual Capacity shall be sited at the end of this brief for referenced causes in the History of the Case.)

AMENDED COMPLAINT

This Court possesses Jurisdiction to hear this case by Article VI of the United States Constitution.

Pro se Pleadings are to be considered without regard to technicality; pro se litigants pleadings are not to be held to the same high standards of perfection as practicing lawyers. *Jenkins v. Mckeithen*, *Picking v. Pennsylvania R. Co.*,

And now comes the Plaintiff, Pro Se, with this Amended Complaint, for the purpose of establishing before this Court, (and before the People of this Divided Nation: see thepcpusa.com that this case is mentioned on and will be placed in its entirety,) the screaming wild Facts that this Case is a manifestation of a County and its departments' extreme indifference to fact finding and Due Process of Substantive Rights in the most egregious manners possible via undeniable evidence.

The civil statutes upon which Plaintiff now pleads include the proceeding:

- 1- Negligence
- 2- Gross Negligence
- 3- Breach of Fiduciary Duty
- 4- Malicious Prosecution/Prosecutorial Misconduct
- 5- 42 USC 1983
- 6- 42 USC 1988
- 7- Violation of First Amendment #1- Familial and Intimate Association
- 8- Violation of First Amendment #2- Failure to Address Grievance
- 9- Violation of First Amendment #3- Freedom to Practice her Religious Beliefs
- 10- Violation of Fifth Amendment- Deprivation of Due Process
- 11- Violation of Fourteenth Amendment- Deprivation of Due Process
- 12- Pattern and Practice 42 USC 14141 Pattern and Practice
- 13- Conspiracy to the various violations previously writ.

Case History in more Precise Detail

1- This case history begins with the Plaintiff (Cheyenne L. Goodin; from henceforth to be referred to in the first person as "I", "me", or "myself") in the city of Emlenton, Pa. where I and the paternal father of my child (James Davidson) lived with my mother (Billie Martinez) approximately 3 years ago.

2- At the time that I was 6 months pregnant my mother kicked us out due to personal disputes. It was winter and we had no place to go. My brother's friend stated that he knew someone (Gilbert Smith) that dated my mother's best friend (Angel Carothers) and that he would probably take us in.

3- Looking back, as hind sight is 20/20, I would have never have went to that man's trailer had I known what I was getting my soon to be born son and myself into. Howbeit, at that time I was under the heavy medication of 54 subutex and 90 neurotin a month impairing my mental clarity, and it was cold and we had nowhere to go.

4- When we were taken to his house and I knocked on the door he answered and let us in. He agreed to let us stay if we paid rent. And though I am ashamed to admit this, through him we were shooting crystal meth that he provided while I was in advanced stages of pregnancy. While we were shooting meth he began to implore us to have a threesome with him. James Davidson became enraged when he learned that Gilbert not only wanted me in an advanced state of pregnancy, but also him sexually as well. Learning that Gilbert wanted his body too, he accused me of already having done things with Gilbert and abandoned me there with nothing and nowhere to go.

5- Upon his departure, Gilbert kept me randomly drugged with in addition to my Subutex and neurotin the additional drugs of crystal meth, cocaine, marijuana, and various "benzos" such as

xanax bars until the day I conceived; using me sexually and filming it.

6- On the day of my conception I had 16 seizures and had received a "C-Section." While I was unconscious Gilbert fraudulently signed his name on my son's Birth Certificate. I was not aware that anyone had signed as paternal father because my mother always told me to never let a man claim a child as his on any record; and so I thought such was the case. I was not aware that he falsified my son's Birth Certificate until he told me a week later, "I'm getting paid!"

7- At that time I was basically zombified from the mass conglomeration of prescription and illicit drugs that both he and the doctors kept me on including the addition of another 90 klonopins a month which as any true practicing professional will testify the mixture thereof could not only have caused the seizures and brain damage; it could have killed me!

8- My life consisted of being doped up, screamed at, sexually and sometimes physically abused. I was also deprived of even having social relationships as a normal person. Instead I was forced to sit like an animal in a cage, with him threatening to take my son if I left him. It was like life in Hell without God with mental hell within and conditions imposed creating a hell without.

9- The circumstances imposed upon me were not edifying me mentally, morally, nor spiritually. In fact, they incited me to seek escape by being too doped up to even care. And even in that state of a personal pit, what incited the incident for which cause I called the State Police to escort me out is clear and unmistakable.

10- On the day of the incident, we were not getting along because of the fact that the previous day before I witnessed something that disturbed me greatly; that day I awoke and had given my son a bath. I then went into the shower while Bert had taken my son out to the living room couch to get him dressed and diapered. That's when I then heard my son frantically screaming to the top of his lungs, and that's when my heart dropped. I ran out the shower

and ran to my son who was on the couch, naked, and squirming in a manner a mother instinctively knows is not good. What I saw was him screaming and kicking at Bert with an unusually red penis and what appeared to be a mark where he put his hand on his face while he was yelling "Shut the fuck up..." at him.

11- It took me til the next day because I did not want to believe my eyes or my ears. After I began to question Gilbert he became distressed and angry; and then he accused me of having hallucinations. The fact is that on that day he was on Xanax bars and crystal meth rendering him either legitimately unable to remember what he was doing in his mental state; or wickedly wise enough not to admit the thoughts he entertained: but either way, I knew that my son and I had to get out of there.

12- And so, I came to my conclusion of an escape plan, and that's when I went to go pack my son and our things and he started threatening me to not leave with my son; that he had all rights and custody of Xavier. And then we were fighting and screaming at one another while my son was present screaming also. Gilbert then asked me for my medications and that's when I took off to the bathroom to put them up my vagina. (While I was in the bathroom he was apparently calling my sister on video chat which he paid for sex shows and to side with him over me.) After I came out of the bathroom and he saw I was on my way out the door, he put down the phone and grabbed at my bra thinking I had them there; then physically jumped on me and was yelling at me for the medications. He then grabbed me around my neck causing bruises that the cops had taken pictures of that day. A knife had fallen from the kitchen sink. That's when I defended myself and gave him a nick on his wrist, permitting me get out from under him.

13- I went to the landlord's and asked him, "Can you please let me use your phone? I've been attacked...": The landlord responded, "No. You can't use my phone! I warned you about him...," and then laughed at me.

14- I returned to trailer to grab my son and Gilbert was on the phone; so I took him, and went to neighbor's next door to call State Police for help.

15- Soon afterwards the cops had shown up and took me and Bert into custody. That's when he was released, and I got taken to the butler memorial hospital for another anxiety induced seizure. I had been transported back and forth from the jail to the hospital for anxiety induced seizures multiple times.

16- I called Neighborhood Legal Services and VOICE for help, and was put on a waiting list.

That's when I then called attorney Charles Nedz, my CYS caseworker Alex, Children and Youth Services, and lastly Bobetta Roper my attorney for family court; all of these people were told this and didn't want to help me but put me in to see a therapist! I well knew my son's safety was more important to me than feeding their corporation that feeds off hapless Citizens such as forced Mental Therapy or Family Counseling!

17- The names of the people contained in the previous paragraph are what are termed as "Officers of the Court."

18- (Please note: Officer of the Court- Noun- Any person who has an obligation to promote justice and effective operation of the judicial system, including judges, attorneys, and personnel that appear in court as part of civil employment.)

19- Beginning with Public Defender Charles Nedz: This man REFUSED to provide me with my case discovery and DECEIVED me into a guilty plea I was not even aware I made until my

husband (Matthew Paul Dec) saw it online at the UJS.Portal. Nor did he provide the courts with the knowledge of what the Truth behind this case is. He ran me through like an animal through the slaughterhouse.

20- The people from CYS and Domestic Relations did not even query what occurred and gave my son to that idiot who is NOT THE FATHER and told me that it is "...OK to falsify Public Records and give false Sworn Statements both written and verbal to the courts. They do it all the time to close a case and get paid. That's just the way it goes..."

21- (An interesting note: A CYS worker asked Bert why he was trying to take ANOTHER WOMAN'S BABY as this was not the first time he was after a man child; he viciously snapped at her that that was a different case and the CYS worker cowered back from him and it was never mentioned again.)

22- I was then provided with an attorney named Bobette Roper Magnusen who was told these things and told me that none of that matters. The only things that matter is that I am no longer on 54 subutex, 90 neurotin, and 90 klonopins; and they want me back on them to eat my brain away! I told her Jesus Christ set me free from those drugs and her disdainful remark I didn't quite catch. Then, when in court she REFUSED to represent me according to what happened to me, they were giving Bert my son without even a fight so I began to cry. So she filed a motion to have me declared mentally incompetent and another attorney to come suck off the dying carcass that was once my case. (See attached papers.)

23- Enter Amy Burton: I have tried telling this idiot what happened as well, and came to the conclusion that all these people are in "cahoots" and need to lose their license to practice law. I will spare the court the definition of an attorney's duty to their client and save it for the Jury

who will determine by examining the court records (which I will subpoena) to see if these defendants have "Zealously" represented me or are guilty of Negligence and Breach of Fiduciary Duty...

24- Enter the Solicitor for Butler County who appeared at my motion to file a federal suit who upon leaving in the hall who basically stated to me: "Personally, I don't care who does what to your infant child. He can be force suckled by a pervert in a closet for all I care. My job is to clean this mess up for my Masters. Good day!" Contrary to Masonic court opinion, such is NOT the Constitutional DUTY of a solicitor! For which cause he is to be listed as a conspiratorial defendant as well.

Because there are many conspiratorial creatures involved, it is difficult to name them all without Court documents petitioned in the Subpoena attached. For which cause, Plaintiff requests this Court's liberality in adding their names thereto after receiving court records indicating what they have and have not done.

Plaintiff demands a Jury of her Peers.

Relief Sought from Court

Plaintiff petitions the Court for the proceeding relief:

- 1- A proper investigation be instituted against Gilbert Smith for Tampering with Public Records, Fraud, and Sworn False Statements.
- 2- That my son Xavier be taken from that man and be placed in safe and proper home of Adoption.
- 3- That the "harassment" I was DECEIVED (I told Nedz I wanted a TRIAL!) into "accepting" be stricken from the record as Fraud upon the Court and Violation of Due Process.
- 4- Although monetary compensation is a consideration for both punitive and emotional suffering; because I despise you people with what might be considered a Holy Homicidal Hatred from on High grounded in Righteous Indignation: I desire nothing more than to leave this cursed county and to find another location within which to reside and heal from all this that has been done to me by my family, the doctors that prescribed me those medications that eat away the brain, to that fiend of a human being called Bert, the cops, the courts, and all the idiots that came with it.

For which cause, I am open to hearing a settlement offer. If the County is unwilling and desires to fight to give my son to that Individual named Gilbert in this filing, Plaintiff will demand the highest amount of compensation in award possible and Under Color of Law criminal codes as well upon prevailing.

Respectfully,

Cheyenne L. Goodin

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