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## WTSCONSIN COURT OF APPEALS SECOND DISTRICT

In the interest of A.M.M a person under the age of 17: Waukesha County,

Petioner-Respondent

v.

C.M.M.

Respondent-Appellant

Wisconsin Supreme Court Rule 809.19 Direct Review of Administrative Decision From The Waukesha County Circuit Court

Circuit Court Case No. 2020JC000026

Judge Lloyd V. Carter Rendering Decision to Be Reviewed

## **REPLY BRIEF OF RESPONDENT-APPELLANT**

C.M.M. Respondent-Appellant, Self-Represented In care of 9705 West Hampton Avenue. Apt # 1 Municipality of Milwaukee/County of Milwaukee Republic of Wisconsin [53225] (414)526-6890

## **ORAL ARGUMENT REQUESTED**

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**OF WISCONSIN** 

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#### INTRODUCTION

Contrary to the contention set fourth in the response brief presented by petioner-appelle, particularly that of the statement of the issues presented (See Response Brief of Petitioner-Appellee, p. 5). The legal question I, respondent-appellant, C.M.M. has raised up for consideration and analysis for being reviewed by this court revolves around, "Whether it was procedurally improper as a matter of law for the Criminal Division Judge to assume the position as substitute judge to adjudicate over Juvenile Division matters involving Child Placement Custody without having had obtained approval either from the assigned Juvenile Division Judge or from the Chief Judge in accordance with the prescribed provisions of Section 801.58(2) of the Wisconsin State Statues?" (See Opening Brief, Points and Authority, and Issue Presented For Review, pgs. 1 & 2)

The pleadings, in their entirety, as set forth in the response argument presented by the petitioner-appellee is deductively invalid and is inductively very weak and contains an unjustified premise that ignores relevant evidence that is available and that is known by the petitioner-appellee.

The Petitioner-Appellee does not dispute, because it cannot in "good faith" contest, refute, negate or disprove the crucial main point/bottom line of the argument presented in my, Respondent-Appellant, C.M.M.'s opening brief (See Opening Brief, Argument, p. 2).

The evasive argument presented in the petitioner-appellee's response brief, much like the evasive argument presented in the petitioner's November 11, 2022, Public's Amended Motion Deny Motion for Reconsideration (R.Doc. 299; Appendix, pg. 56a.) In addition to creating

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an alternate argument, and then present argumentation supportive of the fallacy argument while not address the actual issue presented in my, respondent-appellant, C.M.M.'s opening brief either in form or in substance. The writer of the petitioner-appellee's response brief advance the fraudulent and misleading claim that this matter is on appeal from an order granting request for substitution, entered in Waukesha County Circuit Court, the Honorable Laura F. Lau (*See* the face of Respondent-Appellee's Opening Brief *and see* the face of Respondent Appellee's Appendix). The Notice of Appeal filed by me, respondent-appellant, C.M.M., clearly state that this matter is placed on appeal from the November 11, 2022 entered order denying motion for Reconsideration, presided over by Criminal Division Circuit Judge, Lloyd V. Carter, whose action(s) and/or inaction(s) occurring on November 11, 2022 have absolutely nothing to do with Juvenile Division Circuit Judge, Laura F. Lau (See R.Doc. 312; Appendix, Notice of Appeal, p. 42a).

As I, Respondent-Appellant, C.M.M., will further demonstrate below showing how Section 801.58(2) does not contain any language and/or instructions authorizing Section 801.58(2) of the Wisconsin State Statutes to be used as a juicer machine to blend Apples (in this case, the Criminal Division) with Oranges (in this case, the Juvenile Division) to produce a resolution to parent placement issues, which rest solely within the circumference of matters falling within the exclusive jurisdiction of Family Law.

I, respondent-appellant, C.M.M., contend that the writer of the Petitioner-Appellee's response brief has failed to show the existence of a "*good faith*" bases for utilizing Section 801.58(2) of the Wisconsin State Statutes to obtain a Substitution of Judge from the assigned

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Juvenile Division Judge to a Criminal Division Judge assigned to preside over various criminal felony offenses matters pending against the mother of said child, A.M.M.

I, Respondent-Appellant, C.M.M., further contend that in addition to reversing the circuit court's decision of November 11, 2022, and remanding this matter back to the circuit court with direction that this matter be returned back to docket of the Juvenile Division. This Court should strike the petitioner-appellee's response brief and impose the appropriate sanction upon the petitioner-appellee and the writer of the petitioner-appellee's response brief for submitting pleadings to this court in "*bad faith*".

#### ARGUMENT

#### I.

### IT WAS PROCEDURALLY IMPROPER, UNETHICAL AND PROBABLY UNLAWFUL FOR THE GUARDIAN AD LITEM TO CAUSE A SUBSTITUTION OF JUDGE FROM THE ASSIGNED JUVENILE DIVISION JUDGE TO A CRIMINAL DIVISION JUDGE DURING THE RESOLUTION PHASE OF A CHILD PLACEMENT ISSUE

A. Section 801.58(2) of the Wisconsin State Statutes does not contain any language authorizing a substitute judge from the Juvenile Division to the Criminal Division to resolve parent placement issues governed by Family Law.

In Respondent-Appellee's response brief the writer, CHARLES D. KREGER, by appearance

seem to be attempting to sway this court into wrongfully thinking and believing that Section

801.58(2) of the Wisconsin State Statues is applicable to removing Parent Placement issues from

the assigned Juvenile Division Judge to the inappropriate Criminal Division Judge (See

Respondent-Appellee's Response Brief, p.12 ), as well as cites various case laws to support their

proposition that the manner in which Section 801.58(2) of the Wisconsin State Statues was used

in this instance was proper and correct. However, neither does Section 801.58(2) of the

Wisconsin State Statues either explicitly state, or implicitly imply that it is procedurally proper

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and correct for a party to seek a Substitute of Judge in order to transfer subject matter jurisdiction of parental placement from the Juvenile Division to the Criminal Division, indicative of the manner used by the Circuit Court's Guardian Ad Litem Norman L. Geschko, seemingly done in a manner to discriminate against, and to interfere with my, respondent-appellant C.M.M.'s rights and entitlement to have said child, A.M.M., placed in the sole custody of me, respondentappellant, C.M.M., and seemingly to cover up the large sum of monies acquired from the State via Waukesha Department of Health and Human Services Child Protective Services in the form of Foster Care Payment/Kinship, and Guardian Ad Litem service fees.

Though the plain language of Wis. Stat. Section 48.235 & Wis. Stat. Section 801.58(1) provides authorization for a Guardian Ad Litem to seek a substitution of Judge. Those to particular Statutes do not contain any language either explicitly stating, or implicitly implying that it is proper, ethical, and lawful for a Guardian Ad Litem to pursue a substitution of Judge from the assigned Juvenile Division Judge to a Criminal Division Judge, indicative of the seemingly procedurally improper move orchestrated by the Guardian Ad Litem. Neither has the Respondent-Appellee point to any well-settled case laws either from Wisconsin's various Court of Appeals, or Wisconsin's Supreme Court deeming it to be acceptable for a Guardian Ad Litem to use Section 48.235 and Section 801.58(1) of the Wis. Stat., to acquire a substitution of Judge from the assigned Juvenile Division Judge to the Criminal Division Judge in matters concerning the resolution of Child Placement issues.

Surely, this court will agree that Section 48.235 and Section 801.58(2) of the Wis. Stat. allowing a Guardian Ad Litem to seek substitution of Judge only when the substitution of Judge involves substitution of a Judge assigned to the same Division. Circuit Judge Lloyd V. Carter is not assigned to the Juvenile Division for presiding over Child Placement issues. But rather,

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Circuit Judge, Lloyd V. Carter, is assigned to Branch 4 Criminal/Traffic Division for presiding over Criminal Felony Offenses and Criminal Misdemeanor Offenses (*See* Notice Judicial Rotation Information; Respondent-Appellant's Opening Brief, Appendix, p. 41(a)).

This court should take Judicial Notice that the Guardian Ad Litem moved for Substitution of Judge without establishing a "good cause" basis for doing so, and seemingly to evade complying with the instructions clearly set forth in the assigned Juvenile Division Judge Laura F. Lau's August 1, 2022, issued directive requiring that all original documents, in reference to A.M.M., to be provided to her (*See* R. Doc 264; Appendix, p. 40a.). The Guardian Ad Litem did not comply with the assigned Juvenile Division Judge's directive of August 1, 2022, because he could not comply being that the Case No. 2020JC0026 had been commenced and continued under the A.M.K., a fictious child. There was never an action commenced through the Branch 12 Juvenile Division in regards to said child, A.M.M.

The Petitioner-Appellee has not shown it being a "customary practice" of the Waukesha County Circuit Court to allow a Guardian Ad Litem to use Section 48.29 and Section 801.58(1) of the Wisconsin State Statutes for seeking a Substitution of Judge from the assigned Juvenile Division Judge to a Criminal Traffic Division Judge to adjudicate over child placement proceedings.

It can be reasonably inferred that the assigned Guardian Ad Litem, Norman L. Goeschko, who was assigned to represent the best interest of said child, A.M.M., merely misused the proper usage of Section 48.29 and Section 801.58(1) to cover up the unnecessary disbursement of a vast amount of the State's monies via Waukesha County Department of Health and Human Services/Child Protective Services, when there did not exist any probable cause or any other lawful justification for doing so, based upon my, respondent-appellant, C.M.M. having had been

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determined to be eligible and entitled to having said child, A.M.M., placed into my parental custody (*See* R.Doc. 265; Request To Change Placement dated August 4, 2022). As a means to interfere with and avoid the actual facts of the child placement issue becoming known to the Branch 12 assigned Juvenile Judge, Laura F. Lau, particularly that of the exposure of the matter being brought under the name of a non-existing child, A.M.K.

B. The various case laws cited throughout the petitioner-appellee's response brief are not remotely applicable to the particular set of conditions and circumstances serving as the bases for this appeal <u>as filed by petitioner-appellant</u>.

The three case laws the petitioner-appellee chose to use as a means to bolster up their claim of it being appropriate for a Guardian Ad Litem to submit a request for a substation of Judge. (See Petitioner-Appellee's Response Brief; Argument, pgs. 8-15). Contrary, to the petitioner's contention (See Petitioner-Respondent's Response Brief, Argument, Part C, p.14, para, 2, sentences 1, & 2). And assiduous review of the **record** on appeal. This court will clearly see that neither does the an electronic or hand written signature of the Juvenile Division Judge Laura F. Lau nor does the Signature of the Chief Judge Jennifer S. Darrow appearing anywhere on R.Doc. 267; Appendix, p. 42a. It can reasonably inferred that based upon either an electronic, or hand written signature of the Juvenile Division Judge Laura F. Lau authorizing a transfer of the Parent Placement issue from the Juvenile Division to the Criminal Division.

Surely, this court will agree that Section 801.58(2) of the Wisconsin State Statues is only applicable when a party seeks Substitution of Judge from one judge to another judge assigned to the same Division. It will be very remiss on the part of this reviewing court either to think, or to believe that a Juvenile Division Circuit Judge, Laura F. Lau, would sign off in approval of the child placement issue being transferred over to Criminal Division Circuit Judge, Lloyd V. Carter, on August 1, 2022, when she issued her order stating, in part; "All original court pleadings must be filed with the Clerk of Circuit Court for Waukesha". (*See* R.Doc. 264; Notice of Assignment of Judge, Appendix, p. 264).

This Court should take judicial notice that this case was commenced in the interest of A.M.K., and was being adjudicated under that improper name, A.M.K., and was continued to be adjudicated under the improper name, A.M.K., up until when assigned Juvenile Division Judge, Laura F. Lau issued her directive of August 1, 2022. The petitioner-appellee did not, because it could not, produce any original court pleadings under the name of A.M.M., in light of the reality Case No. 2020JC26. It can be reasonable inferred that the real motive behind the manner in which the substitution of judge, as perpetrated by the Court appointed Guardian Ad Litem, is to cover up the misappropriation and/or fraudulently acquired of State's monies on a child placement scheme when I, respondent-appellant, C.M.M. was eligible and entitled to having said child, A.M.M., placed in my, respondent-appellant, C.M.M. parental guardianship.

C. Wisconsin State Statute 801.58 and 48.29 does not provide authorization for a Court appointed Guardian Ad Litem to Seek Substitution of Judge during <u>civil proceedings</u>.

In its response brief the petitioner seem to be attempting to sway this court into wrongfully thinking and believing that its actions, as related to Substitution of Judge was properly carried out in accordance with Wis State Statue 801.58 and 48.29 as a means to provide justification for having the child placement issue transferred from the assigned Juvenile Judge to the Criminal Division Judge (*See* Petitioner-Appellee's Response Brief; Argument I., pgs.8-16). However, Sections (1)(2) of Rule 801.58 of the Wis State Statues governing the procedure for substitution of Judge by the Guardian Ad Litem during Civil Proceedings clearly states;

(1) Any party to a civil action or proceeding may file a written request, signed personally or by his or her attorney, with the clerk of courts for a substitution of a new judge for the judge assigned to the case. The written request shall be filed proceeding the hearing of any preliminary contested matters and, if by the plaintiff, no later than 60 days after the summons and complaint are filed or, if by any other party, not later than 60 days after service of a summons and comply upon that party. If a new judge is assigned to the trial of a case, a request for substitution must be made within 10 days receipt of notice of assignment, provided that if the notice of assignment is received less than 10 days prior to trial, the request for substitution must be made within 24 hours of receipt of the notice and provided that if the notification is received less than 24 hours prior to trial, the action shall proceed to trial only upon stipulation of the parties that the assigned judge may preside at the trial of the action. Upon filing the written request, the filing party shall forthwith serve a copy then on all parties to the actions and in the manner provided in s. 801.18(6) (a) or (c).

(2) When the clerk receives a request for substitution, the clerk shall immediately contact the judge whose substitution has been requested for a determination of whether the request was made timely and in proper form. If the request is found to be timely and in proper form, the judge named in the request has no further jurisdiction and the clerk shall request the assignment of another judge under s. 751.03. If the judge named in the substitution request finds that the request was timely and in proper form, that determination may be reviewed by the judicial administrative district or by the chief judge of an adjoining judicial administrative district if the judge named in the request is the chief judge, the party who made the substitution request files a written request for review with the clerk no later than 10 days after the determination by the judge named in the request. If no determination is made by the named judge in the request within 10 days, the clerk shall refer the matter to the chief judge of the judicial administrative district or to the chief judge of an adjoining indicial administrative district or to the chief judge of an adjoining strative district or to the chief judge of an adjoining indicial administrative district or to the chief judge of an adjoining indicial administrative district or to the chief judge of an adjoining judicial administrative district or to the chief judge of an adjoining judicial administrative district or to the chief judge of an adjoining judicial administrative district, if the judge named in the request is the chief judge, for determination of who the request was made timely and in proper form reassignment as necessary. The newly assigned judge shall proceed under s. 802.10 (1).

This court should take judicial notice that the Guardian Ad Litem only moved for substitution

of judge after realizing that he could not "honestly" and in "good faith" comply with the assigned Juvenile Division Judge's directive of August 01, 2022 (<u>See</u> R.Doc. 264; Notice of Assignment of Judge; Appellant's opening brief, p. 40a.). The petitioner's submitted Substitution of Judge document fails to disclose how the assigned Juvenile Division Judge had engage in a series of bias and prejudicial behavioral practices which would interfere with the petitioner's ability to afforded with a non-bias, non-prejudicial hearings and rulings. The Statute [801,58(1)(2)] does

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not contain any language either explicitly stating, or implicitly implying that the Statute can be used to obtain a Substitution of Judge merely based upon General Principles.

It would be very remiss on the part of this court either to think, or to believe that the assigned Juvenile Division Judge would concede to a transfer of the Parent Placement issue to be transferred to and decided upon by a Criminal Division Judge who is not vested with any authorization either in fact, or in law to address any parental placement issues governed by Family Law.

Surely, this court will agree that even though a court appointed Guardian Ad Litem is authorized to seek a Substitution of Judge in civil proceedings per Wis State Statue 801.58 the Statue [801.58] does not contain any language authorizing a court appointed Guardian Ad Litem to seek a substitution of Judge from a Juvenile Division Judge to a Criminal Division Judge during the pendency of civil proceedings involving Parental Placement issue awaiting a finial determination by the Assigned Juvenile Division Judge, indicative of the maneuver orchestrated by the court appointed Guardian Ad Litem, Norman L Goeschko, who apparently acted in "*bad faith*".

Surely, this court will agree that had there been any legitimate basis for the Substitution of Judge, and had the court appointed Guardian Ad Litem scheduled a hearing on his seemingly inappropriate motion for substitution of Judge in order to fully disclose all essential information to the assigned Juvenile Division Judge and the Chief Judge. Then, neither would the assigned Juvenile Division Judge, nor would the Chief Judge passively acquiesce to having their names placed upon a entered order, by someone other than themselves, indicating the Guardian At Litem's submitted motion for Substitution of Judge was granted.

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The Petitioner-Appellee would like for this review court to think and believe that criminal division Judge, Lloyd V. Carter was properly assigned under Wis States Statues 801.58(2) in the place of Juvenile Division Judge, Laura F. Lau, in that the request of Substitution of Judge was approved by Chief Judge Jennifer R. Darrow pursuant to section 751.03 of the Wis State Statue. (*See* Response Brief of Petitioner-Appellee; Argument I., Part C, Pg. 14 para. 2). However, R. Doc. 267, p. 2, indicates that the current court approval was prepared and approved by an individual of the name, Lorri Allen. In addition to the document providing no explanation. The document does not bare either a electrical signature, or a hand signature of the assigned Juvenile Division Judge, Laura F. Lau. Furthermore, R. Doc. 270 cites the name of Lorri Allen as the current court official approval who approved the application, without explanation, indicating it being ordered that Jennifer R Dorrow, Chief Judge, granting the Guardian Ad Litem motion for substitution of Judge, electronically signed by some individual known by the name, Michael Neimon, and indicating Lloyd Carter as the name of the Judge assigned.

It would be very remiss on the part of this court either to think, or to believe that Section 801.58 (2) and Section 751.03 of the Wis State Statues authorizes either an assigned Juvenile Division Judge, or a Chief Judge of any Circuit Court within the State of Wisconsin to grant the approval of the Substitution of Judge from the assigned Juvenile Division Judge to the Criminal Division Judge.

Surely, this court will agree that Sections 48.235 and 801.58(1) only affords a court appointed Guardian Ad Litem, involved in civil proceedings, to seek Substitution of Judge within the same Juvenile Division. The Guardian Ad Litem has not provided any well-settled case laws of the State of Wisconsin, or any other circuit court in any other state of the union

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authorizing a Substitution of Judge from an assigned Juvenile Division Judge to a Criminal Division Judge.

The plain language of the Wis State Statues [801.58(1)(2)] clearly states what it says and means what it says, and the court appointed Guardian Ad Litem does not reserve the right to stretch either the intent, or the purpose of the Statute [801.58(1)(2)] at his discretion.

It is important to note that the particular set of condition and circumstances underlining the several case laws cited by the petitioner-appellee are not remotely related to the particular set of conditions and circumstances underlining this matter. The particular set of conditions and circumstances underlining the case laws used by the petitioner-appellee did not involve a Court appointed Guardian At Litem using the Statute to obtain a Substitution of Judge from an assigned Juvenile Division Judge to a Criminal Division Judge as a means to evade the responsibility to comply with a directive issued by the Juvenile Division Judge. The various case laws are not precedential value, and have been improperly cited.

It is very unlikely that there exist any instances during the entire history of the Judiciary of the State of Wisconsin where it has been the acceptable norm for a Court appointed Guardian Ad Litem to use the Statute to cause a Substitution of Judge from an assigned Juvenile Division to a Criminal Division Judge to resolve a pending parental placement issue, indicative of the unethical behavioral practice of the Court appointed Guardian Ad Litem in this matter.

# D. The Court appointed Guardian Ad Litem fails to identify the particular individual who the CHIPS application was commenced against.

It is important to note that I, respondent-appellant, C.M.M., never represented a party in this matter. This matter was commenced against the mother of said fictitiously named child, A.M.K.

based upon her persistent criminal behavioral practices warranting protection by the State of Wisconsin, Waukesha County Department of Health and Human Services – Child Protective Services. Criminal Division Judge, Lloyd V. Carter, had been assigned to adjudicate over several criminal felony offenses committed by the mother of said child, A.M.M.

I, the wrongfully and improperly joined party, respondent-appellant, C.M.M., the only eligible parental party entitled to placement of said child, A.M.M., in my parental custody.

This courtshould take judicial notice that during the seemingly improper and possibly unlawful transfer of this matter from the assigned Juvenile Division Judge, Laura F. Lau to the Criminal Division Judge, Lloyd V. Carter. The mother of said fictitiously named child, A.M.K., Was facing being sentenced to the State of Wisconsin Department of Corrections based upon her persistently placing the physical safety of said fictitiously named child, A.M.K in imminent danger. Warranting the State of Wisconsin to commence and continue its child protective claim against the mother of said fictitiously named child, A.M.K.

As pointed out above in Argument I (A)(B)(C). Section 801.58 (1) and 48.29 (1m) of the Wis State Statues does not afford a court appointed Guardian Ad Litem with any authorization to seek Substitution of Judge for combining a civil proceeding brought under family law to be combined with a pending criminal proceeding commenced under criminal law, indicative of the manner in which the Court appointed Guardian Ad Litem caused me respondent-appellant to be made party to this matter, and to secure a transfer of this matter from the Juvenile Division Judge Lau F. Lau, to the criminal Division Judge, Lloyd V. Carter.

Surely it has never been the norm of this court of review to make a determination indicating it being proper for a court appointed guardian ad litem involved in civil proceedings pertaining to parental placement to use either Section 801.58(2) or 48.29 (1m) of the Wis State Statues to bring about a transfer of child placement matters under the Juvenile Division to be adjudicated 12.

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as some form of criminal misdemeanor and/ or criminal felony proceedings.

Surely it does not represent the Spirit of the intent of the state legislatures for either section 801.58 (2) or Wis Statue 48.29 (1m) to be construed that it is proper for a court appointed guardian ad litem to seek Substitution of Judge from a civil proceedings to a criminal proceedings pertaining to parental placement, indicative of that which was pending before the assigned Juvenile Division Judge, Laura F. Lau as of August 01, 2022 (*See* R. Doc. 264; Circuit Court Notice of Assignment of Judge).

It can be reasonably inferred that the seemingly improper, unethical, and probably unlawful manner in which I, respondent-appellant, C.M.M., was made an involuntary party to this case was to cover up the seemingly improper, unethical, and probably unlawful method used by the Guardian Ad Litem, along with various others unnamed others to obtain access to Federal and State monics under the guise of representing the best interest of said child by way of using the fictitious name A.M.K. Such commencement of this matter would have not been necessary based upon my, respondent-appellant, C.M.M., biological father of said child A.M.M., having had been previously determined to be eligible and entitled to having said child, A.M.M. placed in my parental custody during the determination of the 03/17/2015 issued paternity facts of law judgement (*See* R. Doc 59; Respondent-Appellant's Opening Brief, Appendix, p. 26a.).

For real reasons. only known to the Petitioner-Appellee, and to the Court appointed Guardian Ad Litem, factual information concerning the criminal felony proceedings against the mother of said child, A.M.M., being presided over by Criminal Division Judge, Lloyd V. Carter, was intentionally excluded from being included as part of the record, and was intentionally excluded from being presented in the pleadings set forth in the petitioner-appellee's response brief.

#### CONCLUSION

Surely, this court will agree it is not vested with the authority to legislate from the bench in an attempt to modify, alter, or amend the Wis. State Statue [801.58(1)(2), 48.29 (1m), 48.235 & 751.03], indicative of how the writer of the petitioner-appellee's response brief seem to be tempting to maneuver this review court to do as a means to prevent being held accountable for abusing the proper use of the Wis State Statues [801.58 (1)(2), 48.29 (1m), 48.235 & 751.03].

Therefore, based upon the pleadings presented in this reply brief as well as the pleadings presented in the opening brief. The fairest and just decision for this Honorable Court to make as a Guardian of the law would be to reverse the trial courts issued order of Nov. 11<sup>th</sup>, 2022, and remand this matter back to the trial court with direction that this matter be removed from any further adjudication by the inappropriate criminal Division Judge, and with direction that this matter be transferred back to the assigned Juvenile Division Judge to resume its adjudication per the August 01, 2022, notice of assignment of judge issued by assigned Juvenile Division Judge, Laura F. Lau.

Respectfully submitted

Self-Represented Respondent-Appelant

C.M.M. In care of 9705 West Hampton Avenue, Apt. #1 Municipality of Milwaukee/ Milwaukee County Republic of Wisconsin [53225] (414) 526-6890

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#### **CERTIFICATION OF SERVICE**

The undersigned certifies that on the 246 th day of May, 2023, that a copy of the foregoing Reply Brief was served upon the Petitioner-Appellee's attorney of record as his office of record as cited below by placing the same in a sealed envelope with postage fully prepaid thereon and placing the same in a U.S. Post Office Box in the Municipality of Milwaukee, Wisconsin, on the 266 th day of May, 2023, before the hour of 4:00pm.

Julo a

Charles D. Kreger 515 W. Moreland BLVD., Room AC-330 Waukesha, WI 53188 (262)-548-7432 ckreger@waukeshacounty.gov

Goeschko Law Offices LLC. Norman L. Goeschko 123 ½ N. Main St. Upper Lake Mills, WI 53551 (920)-648-3663 norman@broadwayLaw.biz



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CLERK OF COURT OF APPEALS OF WISCONSIN Case 2022AP002081 Reply Brief

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