

1 Karrie Gibson

2 SUPERIOR COURT OF CALIFORNIA

3 LOS ANGELES COUNTY

4 JURISDICTION

5 James W. Gibson

6 CASE NO 17PSFL00745

7 Karrie Gibson

8 RESPONDENCE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL
9 U.S. CODE 144 . BIAS OR PREJUDICE OF JUDGE

10 MOTION TO DISQUALIFY JUDGE SARAH HEIDEL
11 FOR JUDICAL MISCONDUCT INVOLVING
12 CONDUCT IN VIOLATION OF THE CALIFORNIA
13 CODE OF JUDICIAL ETHICS: ABUSE OF
14 CONTEMPT OR SANTIONS.

15 MOTION TO REQUEST RECUSAL OF JUDGE
16 SARAH HEIDEL

17 I, Karrie Gibson, am the respondent in this action and make the following statements under penalty of perjury, under
18 the laws of the State of California, and if called as a witness in this matter, I would competently testify to each of the
19 facts set forth below, as I know each of the facts set forth below, as I know each to be true based upon my own
20 personal knowledge. I am a black woman, who is in a divorce case with a white male James W. Gibson III. I am
21 requesting that Judge Sarah Heidel be disqualified from my current divorce case for racial bias and judicial
22 misconduct. Judge Sarah Heidel has shown blatant bias in the divorce case of Gibson vs Gibson case no,
23 17PSFL00745. Judge Sarah Heidel has systematical sabotage and willingly, knowing and purposely derailed my
24 position in said divorce case. My rights under the 14th amendment has been violated as well as my right to Due
25 Process Under the Law. Judge Sarah Heidel has acted and show blatant bias and disrespect to me because I am a
26 black woman.

27 1. The weighted evidence will show Judge Sarah Heidel systematically bullied me during every hearing.

28 The weighted evidence will show bias in favor of my white husband while she discrimination against
me a black woman.

2. The weighted evidence will show that Judge Sarah Heidel purposely sabotage my position in the
case and put me at a disadvantage. Her actions were not within the law.

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1 3. The fact will show by *omission* Judge Sarah Heidel failed to hold a fair hearing. Judge Sarah Heidel
2 failed to investigate or verify facts or submitted evidence.

3 4 Judge Sarah Heidel recused herself from a restraining order which infers bias. This restrainer order
4 was one of many deceptive tactics of my husband and his deceptive attorney, Ariel Carter. Judge Sarah

5 5. Judge Sarah Heidel failed to follow and uphold the law.

6
7 **Judicial impartiality is a significant element of justice.** Judges should decide legal disputes free of any personal
8 bias or prejudice. As a result of a conflict of interest, a judge may be unable to maintain impartiality in a case and
9 thus should be disqualified. **Even where a judge is impartial, but appears not to be, recusal is necessary.** To
10 promote the goal of judicial impartiality, most states adopted the American Bar Association's Model Code of
11 Judicial Conduct. The Code prescribes disqualification for judges who recognize the existence of conflict of interest,
12 or who encounters allegations of a conflict of interest in a motion disqualify.

13 **Background**

14 My name is Karrie Gibson. I am a 51year old woman who married James W.Gibson 49. James
15 and I married Dec 31. 1993. James and I met in NC, while he was in undergrad. James is a white male, who was
16 adopted by an older well to do couple James W. Gibson and Dottie Gibson. When I met James, he was what I
17 considered a wounded puppy. His parents were racist, not very nurturing and controlled he and his sister Maribeth
18 Gibson with money. James and I bonded rather quickly. James had an infinity for black culture. He gravitated to
19 black women because he was made to feel special. The truth of the matter my husband feels superior amongst black.
20 He is abreast with urban culture. He enjoys being the "cool" white guy. James had a heavy drinking problem in his
21 early 20's He would do mean spirited dark things to me when we were younger. Then he would take me on trips or
22 buy me things to make up for his verbal attacks. (I have documented his abuse in our court records) James worked
23 in social services and I worked in sales. We had a good life depending on how you measure good. My husband is
24 mentally abusive, sometimes physically. We moved to California because he didn't want his parents to know he
25 married a black woman. Eventually he told them that we were married. James was conflicted for the entirety of our
26 marriage. He felt guilt from being married to a black woman. As the years went out James drinking worsened. James

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1 has had an issue with infidelity since we dated. I always forgave him because he would bring me flowers or take me
2 on trips. I knew this wasn't healthy, but I very much loved my husband. James has a daughter Lindsay Ryan, the
3 mother Rochelle Ryan received public assistance because my husband failed to provide child support. James fought
4 a child support case from 2004 until 2015. James was resistant to pay the child support, much like our divorce case
5 he rather pay the lawyers. This child support case weigh on he and our marriage. James was drunk every weekend.
6 Every weekend he would attack me. In 2008 I slipped and fell while on business appointment. I severely injured my
7 back. I eventually left corporate America with a worker's comp case. My back became so bad, I could no longer
8 walk. I was forced to under back surgery in 2016 just to be able to walk. James father became ill, I suspect that his
9 parents threatened to cut him out the will. In 2014 my husband's abuse became unbearable. In 2017 my husband file
10 for divorce a day after I told him I wasn't going to put up with his infidelity. He was going on a "business trip" He
11 told me I couldn't go. We had a big agreement He file for the divorce on his way to his "business trip". My husband
12 waffles all the time. I know this was a tactic to try to make me put up with his infidelity. James moved out of our
13 home on Jan. 5, 2018. He told my daughter he would come back home. He wanted me to see what it was like
14 without him. I hadn't worked since 2008. I tried to do rideshare to earn money because he left me. We talked about
15 counseling, but he was angry because I wouldn't sleep with him. I told him he needed to go to AA, and we needed
16 counseling. While he were away I am sure you just continued to drink. I was in a bad accident while driving for ride
17 share on Dec 7, 2018. I sustained whiplash and a concussion. I am still experiencing migraines, ears ringing and
18 concussion syndrome. My husband went a year without moving the divorce further. I was borrowing money to live.
19 After the car accident I had no means for earnings. I filed a petition for spousal support. The nightmare began.
20 My first court appearance Jan 7,

21 My first appearance in front of Judge Heidel was January 2, 2019. I am not sure why we
22 appeared. I was hoping I could have some sort of spousal support, I at this time had no income. My
23 obligation was over \$2,000 a month. The people at the Self-Help center told me she would address the
24 spousal support. I would like to walk you through my 1st experience and demonstrate my mental state. I
25 was suffering from severe concussion and whiplash. Review the transcript **Exhibit A** January 2, 2019 court
26 transcripts it's clear. I am confused, anxious and desperate for some sort of support. I wasn't aware of who

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1 his attorney was, or the process of the proceeding. His attorney walked over to me, and I greeted her. I
2 address the Opposing Attorney by saying “ I am sorry, so sorry , Ma’am. I haven’t had the pleasure. I
3 explained to her that I have had ongoing medical issues and was recently in a collision. According to the
4 self-help she would address the spousal support issue this day. *1 **Judge Heid1 (The Court): We’re in
5 a hearing now. So, you can have the small talk afterwards.** (This is the first time she talked
6 down to me for no reason. I was being polite to the opposing attorney.) An associate was appearing on my
7 husband’s behalf. She too is African American. I observed Judge Sarah Heidel hearing another divorce
8 case. She spoke politely, kindly to the white husband and wife. She even gave them advice to resolve their
9 issues dealing with the family home. She had never behaved kindly in my presents. *The Respondent*
10 *(Karrie Gibson) I’d like to preface with saying to you that I’m experiencing some health issues. So, I*
11 *recently was in an accident, and I have a concussion. So, it takes me a little longer to process what*
12 *you’re saying. So, if you could be patient with me. I am not really clear what the purpose of this--- I need*
13 *spousal support because James just left, and he abandoned me without paying. (I was really struggling*
14 *during this time)*

15 I explained to Judge Heidel that I have ongoing medical issues and was recently in a
16 collision. *The Court: *2I’m going to make the comment you seem to be very lucid at times and*
17 *then you slow down your speech a lot and seem more confused when you talk about your*
18 *injuries. I’m not sure what’s going on with you, but it’s noticeable.* (When she said this, I
19 didn’t understand her. I was having a hard time with train of thought, which I told her. I now know
20 because I read the transcripts) She insinuates that I am on drugs, or something negative. I draw the
21 inference that it’s negative by her beginning her statement with (“I’m going to make the comment.”) I
22 begged her to provide some type of relief. She refused. She was impatient and condescending. She has
23 maintained this condescending demeanor at every hearing. You can’t see her body language or her facial
24 expression. She is always nasty to me. *(Exhibit B Court Transcripts from February 7 hearing).* On
25 **February 7th, 2019** was my supposal support hearing. I was greeted by the opposing council in the
26 courtroom. She told me we had to confer outside. She asked me if we could move the supposal support

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1 hearing. I said, no. This really rattle me. I have gone 3 months without any earnings. I was so afraid the
2 judge would move the date. I later realized , that was strategy to put me on edge. (Omission 1) Judge Heidel
3 never explained to me that the date couldn't be moved unless I agreed. At the onset of the hearing the
4 opposing counsel began to speak. I immediately interrupted because it was my understanding since I was
5 petitioner, the moving part, I should have gone first. I asked, why does she get to go first. I was worried
6 they would ask to hear the case at a different time. *2 **Judge Heidel scolded me, saying "excuse me."**
7 I apologized. I only wanted to know why she was first if I was the moving party. In the transcript it reads
8 that I apologized at another time during the trial. This isn't what happened at all. She never officially said
9 to me she would hear my case. I begged her telling her I had no income. I had my husband's check stubs.
10 She looked at me and said what do you have? I originally had a presentation to read from because I was
11 suffering from concussion syndrome. By this time, I was truly flustered. The self-help person told me that
12 she would look at tax returns and go from there.

13 ***3 Judge Heidel spent over 30 minutes making me demonstrate how much James had had**
14 **made.** She had our Federal Taxes for the past two years. She also had James' check stub that he
15 submitted with his FL150. (Exhibit C) My husband FL 150 submitted to the court on December:

16 ***4 Judge Heidel didn't look at the financials Mr. Gibson's submitted to the**
17 **court ,but she looked at the FL-150 I submitted. Judge Sarah Heidel gave me a nasty look.**
18 **She said, "You put that you make \$6000 a month."** I was bewildered. I filed for spousal support
19 after I had my car accident. My concussion was at its worse. I must have made a mistake. I meant to put
20 \$600. She continued to give me nasty looks and talk down to me. I only wanted some sort of support. I
21 was a housewife for the past 12 years. I stayed home in good faith that my husband would support me.
22 During this time Judge Heidel asked my husband's attorney to speak to the year to date income. His
23 attorney changed the subject by claiming he will have a forces Furlough Day. I explained to the court that
24 he is an executive. Forced Furlough days doesn't apply to him because he is on salary. Judge Heidel's
25 exact words **See Exhibit B*4 Page 11 line 21 Ms. Gibson, if you continue to speak about matters**
26 **that aren't relevant, I'm going to call this hearing."** I was speaking directly about the matters

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1 relevant to the hearing. His income, that fact that he is lying. Judge Heidel bully me throughout the
2 hearing. Her body language is very oppositional. I am not a lawyer. I am clearly struggling. My husband
3 who makes well over \$180,000. I have no income. I am desperately trying to explain to her the situation.
4 She isn't trying to find out the facts. If she just reviewed the court documents that were submitted by my
5 husband, she can see exactly what he makes a year. I had no income at all. My lights were cut off twice
6 because I couldn't pay the bill. *See Exhibit B Page 8 line 17 *5 My husband's attorney points out*
7 *that his W-2 was filed with the court.* Yet, the judge continues to make me struggle. See Exhibit B
8 Page 6 Line 16-24. **The court: I understand you have a lot on your mind, but you need to , for**
9 **the purposes of this hearing keep it to things that are relevant to this hearing. The**

10 **Respondent: I understand** The fact that I raised my daughter is very relevant to spousal support
11 California Family Code 4320

- 12 (a) A The extent to which the earning capacity of each party is sufficient to maintain the standard of living
13 established during the marriage, taking into account all of the following:
14 (b) (2) The extent to which the supported party's present or future earning capacity is impaired by periods of
unemployment that were incurred during the marriage to permit the supported party to devote time to
domestic duties.

15 c) The ability of the supporting party to pay spousal support, taking into account the supporting party's earning
capacity, earned and unearned income, assets, and standard of living.

16 (d) The needs of each party based on the standard of living established during the marriage.

17 *I was a housewife. I raised our children. This is very relevant. It is one of the major*
18 *factors contributing to why I am unable to earn a living to support my standard of living for the past 20*
19 *years. My husband was able to pursue his career and continued his education because I was wife and*
20 *mother.*

21 I then tell her my husband is an abusive alcoholic. His attorney screams your honor! I tell her I can prove
22 it. I told her he went to AA once. I told her to ask him. She ignored me. She gave me a nasty look. Looked
23 me right in my eyes and ruled against me. She looked at me like there is nothing you can do! I had no
24 income. I don't know where she came up with the figure for my income. I said can I explain about my
25 income. She shook her head instead of answering verbally, so it wouldn't be on record. She used the
26 figures on the Xspouse that his attorney created. *6 **She didn't verify any of the figures from the**

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1 **Xspouse that my husband's attorney submitted.** I also believe she used the figures as if we were
2 in a short term marriage, we were married for 23 years. The figures on the Xspouse were inaccurate and
3 deceptive. Below is the California Family Code for Supposal Support.

4 **4320.**

In ordering spousal support under this part, the court shall consider all of the following circumstances:

5 (c) The extent to which the earning capacity of each party is sufficient to maintain the standard of living
6 established during the marriage, taking into account all of the following:

7 *While married I lived a comfortable life for the most part. The utilities bills were paid, I had food. We had leisure*
8 *activities and went on vacation regularly. After the judge ruled in my husband's favor my credit score dropped 130 points*
9 *in 60 days, I had to apply for food stamps. My light were cut off multiple times. Please not that my husband of 25 years*
10 *earns over \$170,000. His salary is published because he is an executive.*

11 (1) The marketable skills of the supported party; the job market for those skills; the time and expenses required
12 for the supported party to acquire the appropriate education or training to develop those skills; and the possible
13 need for retraining or education to acquire other, more marketable skills or employment.

14 *In 2008, I suffered a horrible fall while working for Chase Paymentech. Progressively my back injury worsened. It was so bad, I*
15 *couldn't walk. I had surgery in 2016. I submitted my medical records. I also submitted multiple email records where I begged*
16 *employers for a job. When I told judge Heidel, about how I looked for a job, she gave me a dirty look. This part of my testimony*
17 *isn't even in the transcripts.*

18 (2) The extent to which the supported party's present or future earning capacity is impaired by periods of
19 unemployment that were incurred during the marriage to permit the supported party to devote time to domestic
20 duties.

21 *Because of my back injury, and my husband appreciate me being home with my daughter. We agreed that I would*
22 *be a housewife. Again, this isn't something Judge Heidel addressed.*

23 (b) The extent to which the supported party contributed to the attainment of an education, training, a career
24 position, or a license by the supporting party.

25 *Prior to my back injury, while employed in corporate America. I contributed to the household the first 7 years of our marriage*
26 *while my husband was preparing to become licensed.*

27 (c) The ability of the supporting party to pay spousal support, taking into account the supporting party's earning
28 capacity, earned and unearned income, assets, and standard of living.

(d) The needs of each party based on the standard of living established during the marriage.

The Judge Heidel left me with no income at all. My monthly household obligation was in excess of \$2000 a
month. She gave me nothing. But my husband has over \$15,000 a month to live on.

(e) The obligations and assets, including the separate property, of each party.

(f) The duration of the marriage.

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1 (g) The ability of the supported party to engage in gainful employment without unduly interfering with the interests
of dependent children in the custody of the party.

2 (h) The age and health of the parties.

3 (i) All documented evidence of any history of domestic violence, as defined in Section 6211, between the parties or
perpetrated by either party against either party's child, including, but not limited to, consideration of:

4 (1) A plea of nolo contendere.

5 (2) Emotional distress resulting from domestic violence perpetrated against the supported party by the supporting
party.

6 (3) Any history of violence against the supporting party by the supported party.

7 (4) Issuance of a protective order after a hearing pursuant to Section 6340.

8 (5) A finding by a court during the pendency of a divorce, separation, or child custody proceeding, or other
proceeding under Division 10 (commencing with Section 6200), that the spouse has committed domestic violence.

9 (j) The immediate and specific tax consequences to each party.

(k) The balance of the hardships to each party.

10 (l) The goal that the supported party shall be self-supporting within a reasonable period of time. Except in the case
of a marriage of long duration as described in Section 4336, a "reasonable period of time" for purposes of this
section generally shall be one-half the length of the marriage. However, nothing in this section is intended to limit
the court's discretion to order support for a greater or lesser length of time, based on any of the other factors listed
in this section, Section 4336, and the circumstances of the parties.

11 (m) The criminal conviction of an abusive spouse shall be considered in making a reduction or elimination of a
spousal support award in accordance with Section 4324.5 or 4325.

12 (n) Any other factors the court determines are just and equitable.

13 ***7 (omission) Judge Heidel didn't ask any question relating to what the law says regarding**
14 **ordering spousal support. Specifically, that I was in abusive marriage for 23 years. When**
15 **I told her he was abusive she punished me by ruling against me. The law says you must**
16 **consider all. Judge Heidel didn't ask one question pertaining to what the law says she must**
17 **consider.**

18 At the end of the Feb 7,th Spousal support hearing the opposing counsel asked to move her March 13th
19 court date to March 14 court date. I declined. Judge Heidel laughed because I said, no. She thought it was
20 funny that I was upset that she didn't award me any spousal support. I declined moving the court date.
21 When I checked the court website I no longer saw the March 13th Motion for Vocational Evaluation. **See**
22 **Exhibit D Original March 13th Vocational Evaluation Court date.** Judge Heidel moved the
23 court date I was not informed. I had no income, I was forced to apply for food stamps. I received a notice
24 saying I had a March 14 appointment for food stamps. This information is very important. I called Judge
25 Heidel's clerk to ask her to move the date. She said if the opposing parties agreed. I emailed my husband's
26 attorney asking her to move the date. My husband's attorney is quite deceptive. She blatantly lies in open
27 court. In her email correspondence she declined, she said she wanted to move the date but I declined. I

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1 emailed her copy of the original motion which was March 13. I asked her how was it moved to March 14th.
2 She said the judge did it for economical purpose. *8 ***If I declined moving the date why would***
3 ***Judge Heidel move the date if I wasn't in agreement. When I wanted to move the date***
4 ***Judge Heidel only agreed to move the date if the opposing party agreed. This is a clear***
5 ***case of bias.*** Each court appearance I struggled with Judge Heidel. I was without council; I had a severe
6 cognitive impairment. The harder I tried to communicate with Judge Heidel the more resistant she
7 became.

8 The March 14th court hearing Judge Heidel continued to bully me and ignore the evidence,
9 and testimony I provided. Early on in the hearing I attempted to get on a better foot with Judge Heidel.
10 Review *Exhibit F Court Transcripts date March 14, 2019*. I tried to explain that I was uneasy during the
11 last hearing because the opposing attorney scared me during the pretrial conference. I attempted to
12 explain that I had a challenge communicating because of my concussion. When I explained the challenges
13 I was experiencing. She questioned the validity of what I was saying. I attempted to point out to her when
14 and how I submitted my medical records to the court for evidentiary purposes she reprimanded me. She
15 bullies me throughout this hearing and every other hearing thereafter. Please notice how I point out to
16 the court that I feel like the court is being hostile to me without cause. I am behaving like any other
17 woman in divorce court, who isn't represented and lack knowledge of courtroom etiquette. During the
18 hearing for the Vocational Evaluation I state that I am not represented. I communicate that I would be
19 open to revisiting the subject of the court once I am represented. In the name of justice and the fourteenth
20 amendment I should have been represented.

21 ***California Family CODE FAM 2030 states the following"***

22 ***(a)(1) In a proceeding for dissolution of marriage, nullity of marriage, or legal separation of***
23 ***the parties, and in any proceeding subsequent to entry of a related judgment, the court***
24 ***shall ensure that each party has access to legal representation, including access early***
25 ***in the proceedings, to preserve each party's rights by ordering, if necessary based on***
26

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1 *the income and needs assessments, I one party, except a governmental entity, to pay to*
2 *the other party, or to the other party's attorney, whatever amount is reasonably*
3 *necessary for attorney's fees and for the cost of maintaining or defending the*
4 *proceeding during the pendency of the proceeding.) I am communicating to Judge Heidel*

5 that I would prefer an attorney. I explain in detail why I want to be represented. *See Exhibit F*
6 *(Page 6 line 3-6)* According to California Family Code 2030 I have a right to be represented to
7 be on an even playing field. My rights under the Fourteenth Amended is being violated. I said,
8 **9("I cannot really speak to it because I'm not an attorney. Now, I am at an extreme*
9 *deficit because I'm not represented today."* It is my position that she declines my request
10 and disregard California Family Code 2030 because I am a black woman. She orders the
11 vocational evaluation depended on the opposing attorney submitting the credential of the
12 evaluator.

13
14 March 14th Motion for Legal Fees. After Judge Heidel ruled against me for the vocational evaluation. I started my
15 requesting legal fees. I tried to get on a better footing with Judge *Heidel. Exhibit F March 14 transcripts Line 4- 19*
16 *Page 2* I began explaining my cognitive challenges. As I write this declaration. I am still having severe challenges. I
17 tell her I have a concussion. *The Respondent: So I'm just delayed. And I'm forgetful and sometimes I have to*
18 *grasp for words. So when you say do I want accommodations, in what way? How can you accommodate me other*
19 *than patience? The Court^{*9} Well. I will do my best to be patient. There's—no documentation that you have a*
20 *concussion. You've been saying this for several months. The Respondent: I submitted to you, ma'am I submitted*
21 *my documentation (the rest of my words are cut off The issue with the court reporter is consistent. Take note*
22 *Judge Heidel continued to make reference to the court reporter being unable to understand. I suspect that is*
23 *another tactic of hers. I have since went before two other judges during this case, her court reporter is the only*
24 *one who had issues understanding me)*

25 **10 The Court : I'm going to actually cut you off because now we're getting far afield. This is not why we're here*
26 *today. I understand your position. You have a concussion. But let's get back to the matter on calendar The*

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1 ***Respondent: But you want to know what the documentation—I submitted with the court what my response is. So***
2 ***for future reference do you want to know?)*** Judge Sarah Heidel makes a statement that I have not documented my
3 condition. I attempted to tell her when I document my condition and where she can find the documentation. She cuts
4 me off and continues to verbally attack me. I do not have an attorney; I am mentally deficient. Judge Sarah Heidel
5 consistently questions the validity of what I am saying. I have never given her any reason to question my
6 credibility. Judge Heidel fails to review any of the documentation that I submit because she does not care about
7 fairness or equity in this divorce. Take note she said she would try her best to be patient with me, but cuts me off
8 from speaking in the same breathe. I want to point out to you in a future hearing Judge Sarah Heidel states I have
9 not documented my medical condition. She refuses to acknowledge anything on my behalf. (***Exhibit F*** Transcripts
10 March 14 page 2,3,4) You can also see on the same transcripts page 3 line 11-27. I explain about my back injury.
11 During the spousal support hearing she gave me a dirty look when I sad down. When I mentioned that my husband
12 was an abusive alcoholic. She tried to claim that she wasn't annoyed. But she did. I thought I wasn't allowed to sit
13 because during the last hearing I stood. I tried to sit toward the end of the hearing because I have a serious back
14 condition. She was visibly annoyed with me. My frame of mine was this lady is mean to me. Why is she mean to
15 me? Was I being disrespectful by sitting? I don't know, I remember sitting and her facial expression and her
16 demeanor. As a black person you try to rationalize the bad treatment. You don't want it to be your skin color.

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18 During the Vocational Evaluation hearing the opposing attorney speaks. Judge Heidel alludes to the idea that I am
19 able to respond freely but this isn't the case ^{*11} ***Exhibit F Page 7 line 7.-28 I ask can I speak. I ask can I read a***
20 ***statement. Judge Heidel says, not at this time. Then I try to speak again. I struggle to speak, at every turn she***
21 ***challenges my effort to communicate. I state that I feel like I am being treated unfairly because I am a black***
22 ***woman. I state that I have never observed black litigants each time I come to this court.***

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RESPONDENCE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
PREJUDICE OF JUDGE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL FOR JUDICIAL MISCONDUCT
INVOLVING CONDUCT IN VIOLATION OF THE CALIFORNIA CODE OF JUDICIAL ETHICS: ABUSE OF
CONTEMPT OR SANCTIONS. MOTION TO REQUEST RECUSAL OF JUDGE SARAH HEIDEL - 11

1 Judge Heidel rules in favor of the vocational evaluation although the opposing council hasn't not
2 submitted the credentials of the supposed evaluator. Please acknowledge the judged moved original date from
3 March 13th to March 14th in favor of my husband, when I declined. I state that I would like to revisit the issue when
4 I am properly represented by council. Family Code 2030 **2030**.

- 5 (a) (1) In a proceeding for dissolution of marriage, nullity of marriage, or legal separation of the parties, and in
6 any proceeding subsequent to entry of a related judgment, the court shall ensure that each party has access
7 to legal representation, including access early in the proceedings, to preserve each party's rights by
8 ordering, if necessary based on the income and needs assessments, one party, except a governmental entity,
to pay to the other party, or to the other party's attorney, whatever amount is reasonably necessary for
attorney's fees and for the cost of maintaining or defending the proceeding during the pendency of the
proceeding.

9 **12 Judge Heidel ignore my request to revisit when I have counsel. She doesn't abide by the law Family Code
10 2030 The opposing attorney hasn't submitted the credentials for the evaluation. Why didn't she continue the
case to allow me to have representation and allow the petitioner to submit the credentials to the court.*

11 Throughout our divorce proceedings I have pointed out how my husband and his attorney has misrepresented the
12 truth. I have submitted conflicting evidence to demonstrate that my husband is blatantly lying. See Transcripts Page
13 15 line 14-line 21. He falsified Form FL-150 stating a mutual fund(incidentally this is joint funds that he converted
without my consent) I showed that mutual fund is actually valued at \$31,699. I showed her another mutual fund of
14 \$50,000 that he didn't even document on the FL-150. Judge Sarah Heidel never makes one comment or question my
husband about the conflicting information. *Exhibit E See Page 17* I point out another falsification my husband
submitted to the court. Judge Sarah Heidel doesn't question my husband about any of the false information that my
husband falsified and I presented tangle evidence to demonstrate he and his attorney's deceit.

15 *Exhibit F See the transcripts page 18 line 2-11. *12 She interrupts me and makes more disparaging remarks. Line 7
16 See page 19 Line 9-21. I am explaining why I became housewife. I mention while she and the opposing attorney
were working on their careers I was being a housewife. I was trying to make the point that I sacrificed my ability to
17 have a career to be a mom, and appease my husband. Judge Heidel retorts *13 "Who are you Speaking to" Notice my
response. Then she claims that my position isn't relevant. My position is very relevant. Judge Sarah Heidel is
18 blatantly bullying me. She has no reason to speak to me in such a way. I was the model wife and mother, she has no
right to talk me in such a way when I am trying to demonstrate why I don't have the ability to afford council. I in
19 good faith thought my husband would always be the income provider. I honored our marriage and our positions in
our marriage. *See Page 20 line 20. Notice* every time I make a valid point she interrupts me, says I am speaking
20 too fast or it is relevant to the case. *Exhibit F See Page 20 line 14-25* I tell her that I need to hire an attorney to
subpoena his bank records. I have repeatedly demonstrated to her how he openly lies about his income and finances.
21 At the end she doesn't award nearly enough to hire counsel. *Exhibit F Page 21 – 22* I tell the court that my husband
is an abusive alcoholic. His attorney objects. I ask if I am allowed to cross examine him. Judge Sarah Heidel
22 declines. She says why is it relevant that he is an alcoholic. The relevancy is he blatantly lied in his response for
spousal support. He claims that I misappropriated funds, when the truth our divorce was caused by his verbal abuse
23 during his drunk benders and his infidelity. *Exhibit F See page 21-22 *13* Each time I address my husband
alcoholism Judge Sarah Heidel begins to verbally attack me. She blatantly lies by suggesting I am being
24 disrespectful. She lies, by saying I am making a face. *Exhibit F Page 22-23*. She bullies me over and over. Please
read my words. These are not the words of a hostile person. These are the words of a woman begging for mercy
25 justice and respect.*

26 *Exhibit F. See page 24 line 20* I point out that I am living well below the standard of living I experienced throughout
the marriage. **14 Omission* Judge Heidel does nothing to make me whole. She doesn't even acknowledge that her

27 RESPONSE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
28 PREJUDICE OF JUDGE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL FOR JUDICIAL MISCONDUCT
INVOLVING CONDUCT IN VIOLATION OF THE CALIFORNIA CODE OF JUDICIAL ETHICS: ABUSE OF
CONTEMPT OR SANTIONS. MOTION TO REQUEST RECUSAL OF JUDGE SARAH HEIDEL - 12

1 previous spousal support ruling was erroneous and egregious. Page 29 of the transcripts Judge Heidel reprimands me
2 for laughing. Let me fully about not receiving my RFO, I did giggle. I giggled because Ariel Carter has been
3 blatantly deceptive. I thought it humorous that she had the gumption to again lie in open court. His attorney's deceit
4 becomes increasing flagrant. If you recall she wanted to move her vocational evaluation originally on March 13th to
5 March the 14 because March 14th was my hearing for attorney fees. His attorney egregiously operates outside the
6 lines of the law. She does this because it is clear this woman has a personal dislike for me. Judge Heidel doesn't
7 know me. There is no reason for her to continue to attack me. By this point a reasonable person has to see that this
8 judge is openly showing bias towards me. See page 30 My husband attorney goes on a tirade of lies. *¹⁵ *Exhibit F*
9 *page 30* She attacks me again. *Line 24* I tell her it's disturbing that she continues to be critical of me. I ask her why
10 doesn't she request that the opposing party presented evidence of their claims. I am dealing with a lawyer who past
11 the bar, yet the lawyer fails to bring the evidence for her petition, and she has no evidence to support her verbal
12 claims. Sarah Heidel does not question or request any tangible evidence by the opposing attorney, an officer of the
13 court. *Exhibit F Page 30 line 28* I directly say to Judge Heidel, "I would like you to ask her to prove it. *Exhibit F*
14 *Page 33* again when I am trying to make my point Judge Sarah Heidel makes these bogus claims about my
15 behavior, attitude or gesture. She claims I pointed my figure at her. I picked up my purse from the floor and pulled
16 out my food stamp card. *¹⁵ *You have to notice every time I make a point she attacks me for no blatant reason*
17 *other than she is a racist. These are the antics that were done in the Jim Crow Sambo era.*

18 *Exhibit F Page 34 line 1.* Judge Heidel claims she imputed me with \$1820 a month. She claims that she was
19 imputing me with minimum wage. This is erroneous and a fabrication. What Judge Sarah Heidel did was use the
20 \$1820 from 2017 taxes that my husband attorney submitted to the court. His lawyer crossed out the actually figure
21 on our taxes and wrote in \$1820. During the Spousal Support Case when I told her my husband was an alcoholic.
22 She looked at me and ruled against me. Judge Heidel originally said for him to pay me \$1400. My husband lawyer
23 coax the judge by saying aren't you going to use her income. Then I said can I respond. Judge Heidel shook her
24 head instead of verbally answering. This information I am explaining is from the Feb 7, 2019 case. Line Page 34
25 line 4 she says she imputed me in the amount of what I could be earning. (*How does she make this assessment of*
26 *what I could be earning? I hadn't earned a regular job since 2008,* She was insinuation that I could be earning
27 minimum wage, but the \$1820 isn't the number that would be minimum wage. She is attempted to cover herself
28 from not ordering the appropriate spousal support. See *Exhibit F* page 34 line 17-24. Judge Heidel reference a
Dissomaster prepared on Feb 7, 2019 when I have explained I have no income. I show her my Food Stamp Card. If I
earned \$4052 I wouldn't be eligible for food stamp. *Exhibit F page 36 line 1.* The court finds that the proposed
payor is able to pay for both parties' legal representation. (I point out this statement because she doesn't award
enough to cover my legal expenses. Then notice I thanked her. I thanked her because I continued to try to be polite
and respectful and she only treated me with disdain and disrespect. I did nothing to her. *Exhibit Page 36 line 3. I*
thanked her for awarding me the nominal Attorney Fee. She reprimands me for thanking her. I have pointed out
time and time again that her attitude towards me is hostile. This is unbecoming of an officer of the court who
hold a judicial seat.

29 I'd like to speak about his assessment and reasoning for the attorney fee and assessment *Exhibit* page 36. Line 11

30 *Line 11- 18 In making this determination, the court has considered several factors A, The Litigation Nature and*
31 *Difficulty and Its Intricacies and importance. This case involves routine issues regarding the division of property*
32 *and spousal support. Extensive Discovery is not necessary. Although some investigation and the assistance form*
33 *experts may be necessary. Based on the nature and difficulty of the litigation, skilled legal training and ability is*
34 *necessary.*

35 *Line 4-8. The court finds that at least 15 hours are necessary to do the work in this case.*

36 *1. How does Judge Heidel determine the litigation nature, difficulty and Its Intricacies and importance.*

37 *a. In the state of California equity is important. I stated that I was receiving food stamps and my*
38 *credit score had dropped 120 points after she declined my spousal support request. Standard*
39 *of living is paramount in any divorce case. I have indicated that my husband spend 10 years*
40 *evading child support with the city of Johnson City, Tennessee. I demonstrated that our taxes*

41 RESPONSE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
42 PREJUDICE OF JUDGE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL FOR JUDICIAL MISCONDUCT
43 INVOLVING CONDUCT IN VIOLATION OF THE CALIFORNIA CODE OF JUDICIAL ETHICS: ABUSE OF
44 CONTEMPT OR SANTIONS. MOTION TO REQUEST RECUSAL OF JUDGE SARAH HEIDEL - 13

1 were seized, and his passport was seized. I explained that I did not want to agree to the
2 Vocational Evaluation without an attorney.
3 i. My husband had paid \$6000 to his attorney by this date. (I should mention as of today, I
4 know he has paid \$40,000 in attorney fees.
5 ii. What is the typical hours spent in the preliminary process of a long term divorce in Ca?
6 iii. If she is orders a Vocational Evaluation, I have a right to hire my own independent expert.
7 iv. I submitted 3 retainer agreements where each attorney wanted \$10,000

8 ***I am highlighting these points, because what Judge Sarah Heidel does at the next hearing is nefarious and
9 iniquitous. I reference the Central Park Five, we all know the story of “ When They See Us” How are these
10 miscarriages of justice rampant in the US legal system? Judges like Sarah Heidel is sitting on the bench.
11 America has a long racist history and the leveraging of white privilege.***

12 My husband was so angry about having to pay for my attorney he went and filed a bogus Restraining Order. The
13 Restraining order wasn't properly served. I found the summons taped to my door. I appeared in court anyway.
14 **Judge Sarah Heidel recused herself.** In my response I told how my husband came to the home, and taunted me.
15 He started bragging about how Judge Heidel didn't like me. He claimed he knew Judge Sarah Heidel. He said that
16 she didn't like “hood rats” He was referring to me. That is a derogatory racist term characterizing black women. I
17 want to point out Judge Sarah Heidel was appointed to the Pomona Court a couple months before my husband filed
18 for divorce in 2017. He waited more than a year after filing to followed up on the divorce. I received a Jan 2 court
19 date five months before. I believe he strategically filed to ensure she was given the case. I do believe he knows
20 Judge Sarah Heidel. My husband was the COO of Optimist Youth Home in Highland Park. His agency hosted many
21 events in the Pasadena area. It is very possible my husband knows Judge Sarah Heidel outside of our divorce. Also
22 why did he file in Pomona? Our family home is in Hacienda Heights and my husband works in Highland Park.
23 **Judge Sarah Heidel recusing herself from the Restraining order implies she is unable to be impartial in hearing
24 with me and my husband as litigants. Once she recused herself, she should have recused herself from the case.**

25 ***The Restrainer Order was heard by Judge John A Slawson.*** Judge Slawson ruled against my husband because he
26 caught him in multiple lies. My husband brought in an email as evidence. The email contradicted his testimony. My
27 husband expected Judge Slawson to not verify the evidence the way that Judge Sarah Heidel does. I am unable to
28 afford the transcripts from this hearing. During this hearing Judge Slawson gave us the opportunity to question each
other and he reviewed the evidence a loud in court. He questioned my husband's testimony. You never hear Judge
Sarah Heidel question any of the opposing attorney's testimony, she never reviewed any evidence in court. NEVER!

1 ***I need to give an update to what is going on with my divorce case. I filed a Motion to Reconsider Spousal Support
2 dated May 3rd. I also filed a Motion to Reconsider Vocational Evaluation. I was not represented. I wanted to
3 revisit the issues once I had legal representation. Please understand I have NO MONEY. I am suffering from a
4 severe concussion. I spent that last 10 years dealing with chronic pain from a severe back injury. I was given a
5 raw deal on my workers compensation case because I wasn't aware that the person who pays for the evaluation
6 usually benefit from evaluation. I only wanted to understand what I was my rights under the Vocational
7 Evaluation.***

8 I had \$5000 awarded to hire an attorney. I called around to find an attorney, I can't find anyone for the \$5000. **As I
9 submitted during the hearing each attorney wanted \$10,000 retainer.** I decide to call Aletha Jones. She was an
10 associated at firm my husband hired. Aletha Jones appeared the very first time on Jan. 2. She and I walked to the
11 elevators together. She was very sympathetic to me. Aletha Jones is an African American. While walking to the
12 elevator she acknowledged that the judge was being racist to me. She didn't come out and say, yeah she is racist but
13 she acknowledged her nasty behavior towards me. Black professional can't come out and say something is racist,
14 they will then be considered playing the race card. It's a catch 22. But because I knew she was a genuine human
15 being I called her. I asked her if she could suggest an attorney. I asked her because I felt like my divorce would go
16 smooth if I was represented by someone she recommended. This information comes into play later. Aletha didn't
17 refer anyone.

18 **RESPONDENCE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
19 PREJUDICE OF JUDGE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL FOR JUDICIAL MISCONDUCT
20 INVOLVING CONDUCT IN VIOLATION OF THE CALIFORNIA CODE OF JUDICIAL ETHICS: ABUSE OF
21 CONTEMPT OR SANTIONS. MOTION TO REQUEST RECUSAL OF JUDGE SARAH HEIDEL - 14**

1 I eventually hired C.O.R.E lead attorney Simon Budwani. Mr. Budwani left a good impression on me. I explained
2 that I had been living on credit cards because my husband abandoned me. This was early April, 2019. Mr. Budwani
3 couldn't get me into see him until Mid- Late April. He understood that I need some sort of support, that I was a
4 housewife for 12 years. My car was retired by Uber also was too old for Lyft, I had no means of income. He
5 planned to help me with the spousal support and also do a RFO for additional attorney fees. The May 3rd court day
6 was right around the corner. Mr. Budwani planned to see if the opposing side would agree to move the court date to
7 July. I had a May 3rd RFO Motion to Reconsider Spousal support. Also a June 14th Motion to Reconsider on the
8 Vocational Evaluation. An Associate with C.O.R.E Charles Major emailed Ariel Carter to ask if she would agree to
9 move the court dates. Ariel Carter agreed to move the court date. Please see **Exhibit J. (emails regarding moving
the date)** Once the court dates were moved, I felt confident that my attorney and my husband's attorney could work
10 things out. My husband attorney has been very aggressive. She has been employing every tactic to bill my husband.
11 My husband is deep in his alcoholism. He is angry and bitter. Anything Ariel Carter suggested to attack me, my
12 husband agrees to. I felt once she has to negotiate with an attorney she couldn't mislead or use the deceptive
13 practices she's been employing throughout the case. I should also point out during my daughter college graduation
14 my husband told me his attorney Ariel Carter was his girlfriend. I know that I should have her investigated for
15 misconduct, but I don't have the time or recourses. At any rate, I believed it would have been a good chance that we
16 could resolve issues outside of court if two attorney's were working on the case.

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When C.O.R.E associate attorney, Charles called the clerk to ask to move the court date, the clerk Deana told Charles that someone had to appear. This is very uncommon. *¹⁵ ***I want you to take note, that when I called to have the March 14, 2019 date I was told as long as the opposing party agreed it would be fine. Why would someone have to appear to ask to move the dates? Judge Sarah Heidel didn't award enough when considering a marriage of 23 years. Why would she want me to use money she awarded to come to court and ask to move the date? My husband's attorney agreed to appear. She was there for another matter. In this case, Judge Heidel instructed the clerk to say someone must appear*** This sounds very fishy to me at the very beginning. Now I am going to detail you on what happened at this May 3rd court hearing that I thought was being moved.

Directing you ***to Exhibit H May 3rd Transcript Page 1 line 28 and page 2 line (1-2)*** My husband's attorney Ariel Carter explains to Judge Heidel that both parties were requesting a continuance. She even acknowledges that the continuance was necessary because I now had representation. In the name of fairness, I should have an attorney. Judge Heidel begins her rant against me. Judge Heidel states that asking for a continuance isn't a good reason not to appear. She is alluding to the idea that she wasn't aware that Charles Major, an associate at CORE called, the clerk he was told someone had to appear. Judge Sarah Heidel's attitude is indicative of abusive of power and White Privilege. Judge Heidel declining the continuance has no legal premise. She is using judicial discretion to discriminate against me, a black woman and with malice and forethought hinder my position in this divorce case. Judge Heidel award me 15 hours towards attorney's fees. If my attorney would have appeared it would have cost me a minimum of 8 hours of court fees.

Testimony from May 3rd hearing May 3rd Transcripts Page 2 line 9-18) Ms. Carter: I understand, your honor. My understanding is that respondent's counsel was retained Limited Scope to continue this matter and to file an additional RFO. There are several RFO's on the court's calendar right now. And in an effort to try to consolidate some of the matters and hopefully resolve some of the matters, we did agree to continue today's hearing out to a date in July, As well as advance response June 14th and continue that as well.

Judge Heidel denied the continuance. She implied that my attorney just didn't appear, as if he did something that wasn't normal and unusual Simon Budhwani from what I know is an reputable skilled attorney. He wouldn't just not show up to court. Simon Budwani received the \$5000 attorney fees payment made by my husband. He could have just appeared and billed me.

RESPONDENCE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR PREJUDICE OF JUDGE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL FOR JUDICIAL MISCONDUCT INVOLVING CONDUCT IN VIOLATION OF THE CALIFORNIA CODE OF JUDICIAL ETHICS: ABUSE OF CONTEMPT OR SANTIONS. MOTION TO REQUEST RECUSAL OF JUDGE SARAH HEIDEL - 15

1 Charles Major with C.O.R.E law group called the clerk to request a continuance. Charles spoke to the clerk Deanne
2 Lee Kistler. Deanne Lee Kistler told Charles that judge is requesting that someone appears. Ariel Carter agreed to
3 appear and request a continuance on our behalf because she would be in that court that day on other matters. On
4 May 3rd, Simon Budwani called me to tell me that the judge ruled against us, even though counsel requested a
5 continuance. I called the clerk to ask her. I asked, "Deanne did my attorney call to request a continuance and if so
6 did you tell him that someone had to appear to request a continuance. Deanne Lee Kistler responded, "No
7 Comment". I asked a second time, to be clear I am asking did my attorney call to ask for a continuance and you told
8 them someone had to appear. Deanne Lee Kistler's second response was, "No Comment." I thanked her, wished her
9 a good weekend and hung up the phone. *See Exhibit H Page 2 Line 26-28*

10 *See Exhibit H page 3 line 12-14 *16 The Court: Ok and then regarding the trial setting conference, I guess I'll*
11 *take your view the issues of what needs to be resolved for trial.* Why is she asking opposing these questions when I
12 am not present and there isn't representation? I didn't purposely do something erroneous. My state of mind was, I
13 now have representation. This will be handled amongst the licensed professional. Why is she penalizing me? A
14 rational person and an officer of the court should be aware that I am a layman with limited knowledge of the law. In
15 every aspect of her attitude, behavior and actions how does this apply to the law? Where is my right to Due Process?

16 During May 3rd court hearing. The court begins her verbal attack of me. She makes reference to limited scope hiring
17 of my attorneys (*I didn't request limited scope agreement*) It was my understanding it was limited scope because I
18 was unable to provide a credit card. I was unable to provide a credit card because Judge Heidel didn't order spousal
19 support. My credit cards went into default because I had no income. Judge Heidel didn't order enough for a the
20 normal and usual retainer amount in divorce cases of this nature. Judge Heidel calls me unreasonable because I hired
21 an attorney to handle my spousal support matter and to request additional attorney fees. *How my behavior is*
22 *unreasonable? I was virtually a housewife for the last 15 years of my marriage. I took responsibilities for the*
23 *household duties including raising our daughter who received a Merit Scholarship to St John University, I cooked*
24 *and cleaned and emotionally supported my husband. I emotionally supported my husband to my best ability while*
25 *being in an emotionally abusive marriage. I endured his infidelity. When he left me, I did everything I could to*
26 *support myself by driving for ride share which compromised my already injured spine. My husband earns \$180,000*
27 *annually. He is an executive for this non-profit. His annual salary is published. I didn't earn an income for the last*
28 *10 years of our marriage. She was aware that I have known medical issues, that my husband is abusive. I even*
29 *submitted several email correspondences where I begged employers for a job. She also knew that I was receiving food*
30 *stamps. Judge Heidel is behaving like a classic racist in power in America. Treating me less than human. She goes*
31 *on to make a negative comment about awarding additional attorney's fees. **See Exhibit H Page 4 line 24-28 *17 The***
32 ***Court: I'm concerned because the court did award attorney's fees and the respondent has gone and hired an***
33 ***attorney limited scope to address a motion to reconsider a temporary spousal support order and to file a motion***
34 ***for additional attorney fees. So I'm concerned about the reasonableness of additional attorney's fees requested***
35 ***going forward if that's the way the attorney's fees are going to be spent.** My attorney is attempting to consolidate*
36 *the dates to be cost effective with the inadequate award Judge Heidel ordered. **She has the audacity to say this***
37 ***statements in open court.** The opposing attorney and my husband agreed to move the dates. In the name of justice,*
38 *why would she rule is such a way? Why would she make such statements about me? There is an obvious bias. This*
39 *type of treatment of black people has been going on since we were kidnapped and brought to his country. Judge*
40 *Heidel attitude is that of a racist who thinks I deserve less than a white woman. I am living well below the standard*
41 *of living I was accustomed to for 23 years. Judge Sarah Heidel used incorrect numbers when ordering temporary*
42 *spousal support. She has NO legal basis. Up to this point she has only done things in favor of my husband. I am*
43 *going to mention that his attorney lies in open court. Ariel Carter opposing attorney doesn't follow legal 2019*
44 *California Rules of Court. Ariel Carter is aware that Judge Sarah Heidel is showing extreme bias. It is obvious to*
45 *every person in the court room.*

46 *I am going to try my best to explain the turn of events to the best of my ability. I am suffering from Concussion*
47 *Syndrome. I am also suffering from sleep deprivation. I am scheduled for a sleep study on December 13th. I have*

48 RESPONSE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
PREJUDICE OF JUDGE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL FOR JUDICIAL MISCONDUCT
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1 *horrible time with train of thought and keeping things in proper sequence. The events become much more*
2 *complicated. Again, I had a June 14th court for Motion to Reconsider the vocational evaluation. Let me be very*
3 *clear! I was not trying to evade the evaluation. I just wanted to have a lawyer advise me on the specifics an my*
4 *rights. Ariel Carter also had a date June 21, she had a Motion to Compel Discovery and Motion to Compel*
5 *Vocational Evaluation. I had NO KNOWLEDGE OF EITHER OF THESE RFO and Ariel Carter as of May 3,*
6 *2019 made NO EFFORT TO INFORM ME OR C.O.R.E LAW GROUP.*

7 Ariel Carter attempts to move the dates to July to give my attorney ample time to get caught up to speed and
8 prepare. Judge Heidel declines and moves my June 14th court date to my husband Motion to Compel Court date to
9 June 21st. A normal person wouldn't view Judge Heidel as being unbiased. She rules against me at every possible
10 turn without cause. Even when the opposing party is in agreement, she rules against me to make my life difficult. A
11 reasonable person cannot explain this behavior other than prejudice and or bias. She goes on to say that she will not
12 hear a request for spousal support. I was in a 23 year marriage where my husband was the sole income earner for the
13 last 12 years of the marriage. The judge didn't order spousal support, I have no income and am now on Food
14 Stamps. Judge Sarah Heidels moves my court date of June 14, to my husband court date of June 21st. Every action is
15 in favor of my white husband. She orders me NO temporary spousal's support when I demonstrated that my husband
16 is in the top 20 percental earnings in California. Judge Heidel rules against what both parties agreed upon. What is
17 her legal reasoning if both parties agreed?

18 The situation goes from bad to worse! My attorney is a busy attorney with a heavy case load. It was very
19 challenging to consult with my attorney. This is the reason we asked to move all court dates to July. After the
20 attorney calls me to explain what happened I went on the court website. This is when I saw a Motion to Compel
21 Discovery. Opposing attorney claims she mailed me Interrogatories. I never received interrogatories. As of May 3rd
22 Ariel Carter does nothing to confirm the receipt of interrogatories. I was finally able to talk to my attorney on June
23 19th. He was very concerned about Judge Sarah Heidel's behavior and obvious bias. We agreed that I would file a
24 Motion to have Judge Sarah Heidel removed for misconduct and judicial abuse. C.O.R.E Law Group refunded my
25 money and provided a substitution of attorney. C.O.R.E law refunded my money less the cost of transcripts.

26 On the June 21, 2019 court date I planned to get record of current family cases that Judge Sarah Heidel ruled on. I
27 wanted to demonstrate Judge Heidel's attitude, demeanor and rulings were in direct contrast to how Judge Heidel
28 persided over my divorce case. I observed Judge Heidel being lenient towards a white male who claimed to have
cognitive issues. I observed Judge Sarah Heidel giving another litigant the opportunity to choose a medical evaluator
amongst several that she named in a case where the husband was paying for the evaluation. I went to the hall to take
a picture of the docket so I could research each case for comparison in my Motion To Disqualify. When I came back
in the court room I attempted to cut off my phone while I sat. I have an Iphone. The button that cuts off the phone is
adjacent to the button that takes a photo. I accidentally push the picture button. The phone flashed. I was started so I
went in the hall to completely cut off the phone. When I was in the hall an officer, a bailiff approached me. His
name is Ojeda. He said someone said I was taking photos. I laughed and I said no I accidentally pushed the camera
button when I was cutting off my phone. I said do you want to see where I accidentally took a photo. I showed him
the blank photos I already had moved to the trash. I also showed him the photos of the docket that I originally went
in the hall. He said, ok. I asked him could I get a photo of his badge. He agreed. Shortly, after another bailiff came
out. Casa, I again explained to Casa what happened. Showed him the docket photos on my phone and also the photo
of Ojeda badge. See Exhibit I the photo of Ojeda's badge. Casa made a gesture that I shouldn't have taken the photo
of Ojeda badge. Ojeda appeared to be a nice and conscience bailiff. He realized I had made mistake.

Directing attention to June 21st *Court Exhibit K transcripts from June 21, 2019. Line Page 2 14-28* I explained that
my attorney subbed two days ago. I didn't have representation. I told Judge Heidel my concerns with what occurred
on the May 3rd court date. How Judge Sarah Heidel made personal attacks and discussed the case when I wasn't
present. I told her that I read the transcripts', that they were inaccurate, that I wanted to hire my own court reporter.

RESPONDENCE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
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CONTEMPT OR SANTIONS. MOTION TO REQUEST RECUSAL OF JUDGE SARAH HEIDEL - 17

1 **See Exhibit I page 4 line 11. The Court: I'm going to stop you. I don't know what you're talking about. The**
2 **Respondent: I'm trying to explain. The Court: I actually don't know what you're talking about. The Respondent:**
3 **you know what ma'am you don't lie me because I'm a black woman. The Court: Ms Gibson---(notice incomplete**
4 **transcripts) The Respondent: Please---(incomplete transcripts) The Court: Ms. Gibson If you are going to interrupt**
5 **me we are going to have a problem (Judge Sarah Heidel is interrupting me. I have demonstrated that every**
6 **hearing Judge Heidel cuts me off, accuses me of speaking too fast or any other antic to deprive me of my rights)a**

7 See Page 4-5. Judge Heidel says she has no feeling about any of the people at the table. **Judge Heidel goes on to**
8 **state. "I don't know any of you and I don't have personal feelings.** I have strong concerns about Judge Heidel
9 saying she doesn't know any of us. I am not a psychologist, but that sound like an unconscious slip of the tongue. I
10 do believe she knows my husband. What I observed she always favors white males. I didn't understand why my
11 husband waited so long after filing for the divorce.

12 Exhibit I page 5 line 2- 8. **The respondent: I disagree. If you would allow me, I have transcripts to show proof that**
13 **each time I try to speak, I'm interrupted. And every case here. I didn't--- this happens. All I'm going to ask you to**
14 **do, ma'am is let me speak to what occurred on May 3rd. Please, in the transcripts , where you verbally attacked**
15 **me. The Court: That's not before the court today that's not before the court. And unfortunately I can't---(This part is**
16 **cut off because she talks nasty to me. See my response. The respondent: I welcome you to show your bias. What I**
17 **am asking for, ma'am is a continuance because I do not have an attorney. And the reason why I don't have an**
18 **attorney because they noticed the bias on your Mar ch(sic) 3rd transcripts So they're afraid of you.**

19 For brevity I urge you to read the entire transcripts, my exchange with Judge Sarah Heidel.

20 **Exhibit I page 6 line 18. The Court: Well Ms. Gibson I think you're speaking to quickly for the reporter and I'm**
21 **not following— Judge Sarah Heidel words are cut off. How many times has this woman cut me off? How many**
22 **times has the woman accused me of speaking too fast. After review the transcripts up to this point the court**
23 **reporter caught all my words. Judge Heidel words are cut off. The court reporter caught all my words.**

24 When one reviews the transcripts Judge Sarah Heidel consistently misrepresents my position. I didn't have an
25 attorney. I explained to her, the attorney had recently subbed out. I attempted to address the issues of May 3rd. Judge
26 Sarah Heidel refused to address the issues. She ruled against me on May 3rd alluding to the idea that the attorney's
27 actions were negligent. If that is the case she should understand or surmise that I changed council for incompetence
28 or inability especially after she strongly chastised my attorney and myself on May 3rd. Again, I am forced to
represent myself in court when California Code 2030 states.

29 **(a)(1) In a proceeding for dissolution of marriage, nullity of marriage, or legal separation of the parties, and in**
30 **any proceeding subsequent to entry of a related judgment, the court shall ensure that each party has access to**
31 **legal representation, including access early in the proceedings, to preserve each party's rights by ordering, if**
32 **necessary based on the income and needs assessments, one party, except a governmental entity, to pay to the**
33 **other party, or to the other party's attorney, whatever amount is reasonably necessary for attorney's fees and for**
34 **the cost of maintaining or defending the proceeding during the pendency of the proceeding.**

35 I need to give additional background to the events of June 21. Judge Heidel swapped out the bailiff's. Originally
36 Ojeda was the bailiff. She changed to baliff Casa. Judge Heidel sent Officer Casa to the hall to talk to me. Officer
37 Casa tried to get me to be angry with my husband. He made comments about betrayal. He attempted to make me
38 angry with my husband. But I made peace with my husband many years ago. My husband suffers from alcoholism.
Many people will not acknowledge this is a disease. I urged my husband to stop drinking. This is part of what broke
up my marriage. Officer Casa even tried to make an analogy that but for my husband betrayal we wouldn't be here. I

RESPONDENCE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
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1 explained to the bailiff. That I serve a good God, that I was at peace with my husband and my divorce. I told him
2 that Judge Sarah Heidel was a racist, once I got enough evidence, I would report her to the press. (*This is where I*
3 *made a mistake*) Just like the Central Park Five others have to be compliant. Judge Heidel sent Officer Casa to talk to
4 me. It never crossed my mind. I actually thought he was trying hit on me. It didn't dawn on me to what he was
5 doing until what Judge Sarah Heidel said during the hearing. Before we went in the hearing, Casa said. Will you
6 give me your phone so no one can claim anything. I didn't understand why he asked. Because I showed he and
7 Officer Ojeda my picture log. They saw the only photos where of the court dockets. I gave him the phone, I had no
8 reason for the phone during the hearing. I later realized Judge Sarah Heidel told Casa to ask for my phone so she
9 could put on the record that my phone was confiscated. The act of changing baliffs one can easily infer that there is
10 some sort of collusion? Why did she change baliff? I should put on the record, that I believe Judge Sarah Heidel
11 spoke poorly about me to Officer Casa. I believe after he witness the hearing he realized that she was bias. Judge
12 Sarah Heidel made negative remarks about taking my phone. When she left the room. I look at the bailiff and I said
13 to him. "You set me up" Officer Casa didn't respond. He looked guilty. He then asked me, did you go to college? I
14 laughed and said off course. He realized that I made a good argument in court. Officer Casa appeared remorseful.
15 After I thought about it I realize Judge Sarah Heidel told Officer Casa to ask me for the phone. He initially believed
16 I was aggressive. After he and I talked he realized that she was trying to negatively characterize me because I told
17 him she was a racist. While we sat at the table while waiting for the judge to return. I realized, she set him. I turned
18 to Officer Casa. I said, you didn't set me. She set you up!" He didn't make a verbal response, but his body language
19 told the truth. He was remorseful.

11 I need to give information about June 21st hearing. Please recall that my original court date was June 14th for Motion
12 to Reconsider Vocational Evaluation. Recall from the March 14th court date. The Judge order that I undergo the
13 vocational evolution. I filed a Motion to Reconsider because I wasn't sure about my rights and what the laws says. I
14 filed the Motion to protect my rights. I hired C.O.R.E a week before May 3rd court date. Both attorneys' agreed to
15 move the June 14th motion to reconsider vocational evaluation to a date in July. I never had a chance to discuss the
16 Vocational Evaluation with C.O.R.E. we were blindsided when she declined the request for the continuance. Judge
17 Heidel doesn't follow the law. She order the evaluation against what the law says. See California Family Code 4331

- 15 1. The order may be made only on motion, for good cause. The opposing attorney doesn't not make any
16 argument for good cause. See Exhibit L proposed order
- 17 2. The order shall specify the time, place, manner, conditions, scope of the examination, and the person
18 or persons by whom it is to be made See Exhibit L the proposed order. The proposed order doesn't
19 address "scope of the examination."

18 Again Judge Sarah Heidel ruling violated what the law says. This isn't a mistake are rare occurrence, this is her
19 consistent behavior and action.

20 **(a) In a proceeding for dissolution of marriage or for legal separation of the parties, the court may**
21 **order a party to submit to an examination by a vocational training counselor. The examination**
22 **shall include an assessment of the party's ability to obtain employment based upon the party's age,**
23 **health, education, marketable skills, employment history, and the current availability of employment**
24 **opportunities. The focus of the examination shall be on an assessment of the party's ability to**
25 **obtain employment that would allow the party to maintain herself or himself at the marital standard**
26 **of living.**

24 **(b) The order may be made only on motion, for good cause, and on notice to the party to be**
25 **examined and to all parties. The order shall specify the time, place, manner, conditions, scope of**
26 **the examination, and the person or persons by whom it is to be made.**

26 **(c) A party who does not comply with an order under this section is subject to the same**
27 **consequences provided for failure to comply with an examination ordered pursuant to Chapter 15**
28 **(commencing with Section 2032.010) of Title 4 of Part 4 of the Code of Civil Procedure.**

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1 (d) "Vocational training counselor" for the purpose of this section means an individual with
2 sufficient knowledge, skill, experience, training, or education in interviewing, administering, and
3 interpreting tests for analysis of marketable skills, formulating career goals, planning courses of
4 training and study, and assessing the job market, to qualify as an expert in vocational training
5 under [Section 720 of the Evidence Code](#) .

6 (e) A vocational training counselor shall have at least the following qualifications:

7 (1) A master's degree in the behavioral sciences, or other postgraduate degree that the court finds
8 provides sufficient training to perform a vocational evaluation.

9 (2) Qualification to administer and interpret inventories for assessing career potential.

10 (3) Demonstrated ability in interviewing clients and assessing marketable skills
11 with an understanding of age constraints, physical and mental health, previous education and
12 experience, and time and geographic mobility constraints.

13 (4) Knowledge of current employment conditions, job market, and wages in the indicated
14 geographic area.

15 (5) Knowledge of education and training programs in the area with costs and time plans for these
16 programs.

17 (f) The court may order the supporting spouse to pay, in addition to spousal support, the necessary
18 expenses and costs of the counseling, retraining, or education.

19 If Judge Heidel would have agreed to the moving of the court dates to allow my attorney to
20 prepare review transcripts and review the facts it is a great chance that all the issues would have been resolved
21 timely and economically. Judge Heidel attentionally sabotages my position in this divorce. She has done nothing
22 within the law at each and every hearing.

23 There is a matter of the Motion to Compel Discover. Motion to Compel Vocational Evaluation. Ariel Carter is well
24 aware that Judge Sarah Heidel is bias. Exhibit E shows emails exchange with my previous attorney and Ariel Carter.
25 In the email the June 14th court date is mentioned. In the email our intention to file a Motion For Attorney Fees and
26 Motion for Spousal Support. Why wouldn't Ariel Carter make mention to the June 21st court date. If she is acting in
27 good faith to my husband why would she NOT attempt to mitigate cost to my husband. Ariel Carter and everyone
28 who witness my hearings are well aware that Judge Sarah Heidel is bias towards me. Judge Heidel gave me \$5000 in
attorney fees. Then she requested that my attorney appear to request an continuance. This Ariel Carter files a bogus

RESPONDENCE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
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1 Motion to Compel. The law says we need to Meet and Confer. I provide tangible evidence that Ariel Carter did
2 nothing to Meet and Confir. Ariel Carter makes false accusation in court. She blatantly lies, Judge Sarah Heidel
3 again rules against me in the favor of Ariel Carter without one shred of pertinent evidence to support her claims. I
4 never received a request for Discovery. This was Ariel Carter deceptive attempt to deplete what little attorney fees I
5 was awarded. Ariel Carter knows this judge is showing extreme bias against me. This Judge Heidel order me to pay
6 \$1500 in my husband attorney fees. As I right this statement my heart races and I feel sick to my stomach. It is 2019
7 this blatant racial bias innocent in the United State Court system shouldn't exist. My heart hurts because this woman
8 is treating me so brutally when I didn't do anything but be a good wife. I only loved and supported my husband even
9 with him being an abusive alcoholic. Judge Sarah Heidel might as well have taken me out back and whipped me like
10 a slave.

11 It is debilitating for me to read through everything this woman has done. How she blatantly attacks me. I spent 23
12 years with man, who abused me. I submitted evidence of his abuse ,but Judge Sarah Heidel refuses to acknowledge
13 his abuse, but she believe testimony without tangible evidence. I am pushing myself to continue to read this
14 transcripts to point show the pattern of bias and failure to request evidence from the opposing attorney.

15 *See Exhibit I June 21 transcripts. Page 8*

16 **The Court: Okay. You have advised the court in**

17 *Exhibit I June 21 transcripts . page 9 line 1-19*

18 **You have advised the past you have an issue relating to a concussion that you sustained in December of 2018**
19 **there never has been any medical reco--**

20 *The Respondent : There has been , Ma am, and you wouldn't acknowledge that*

21 *The Court:--- Supplied to the court. As to the other conditions this is the first you've mentioned them. We are*
22 *going to proceed on the Motion to Compel today. I am going to hear from counsel for the petitioner. But I do note*
23 *your objection.*

24 ***The Respondent: In the transcript, it shows where I submitted all my medical records. And that's is my***
25 ***contention. You are ignoring me and saying things that are not true. I submitted my medical record orders on***

26
27 **RESPONDENCE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR**
28 **PREJUDICE OF JUDGE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL FOR JUDICIAL MISCONDUCT**
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1 *multiple occasions. It's in the transcripts . And Each time I do you don't acknowledge them. And Ma'am I*
2 *welcome you and the bias I welcome it*

3 *The Court: We're going to hear from the counsel please*

4 Please notice Judge Sarah Heidels continued blatant ignoring my medical condition. I have established a pattern of
5 her cutting me off. She repeatedly questioning my medical history. Also the transcripts' read "I welcome you and
6 the bias I welcome it." That is not true. I said that, but I said that at another point in this hearing. I have strong
7 concerns about the court reporter.

8 Please review again for the 2nd time when I point out to Judge Sarah Heidel when and how I submitted my medical
9 records.

10 *Directing you to March 14 court date, again. Judge Heidel. Exhibit D March 14 transcripts Page 2 Line 11 The*
11 *Respondent: So I'm just delayed. And I'm forgetful and sometimes I have to grasp for words. So when you say do*
12 *I want accommodations, in what way? How can you accommodate me other than patience? The Court^{*9} Well. I*
13 *will do my best to be patient. There's—no documentation that you have a concussion. You've been saying this*
14 *for several months. The Respondent: I submitted to you, ma'am I submitted my documentation*

15 *The Court : I'm going to actually cut you off because now we're getting far afield. This is not why we're her*
16 *today. I understand your position. You have a concussion. But let's get back to the matter on calendar The*

17 *Respondent: But you want to know what the documentation—I submitted with the court what my response is. So*
18 *for future reference do you want to know?) The CourtL I'm going to actually cut you off because now we're*
19 *getting far afield. This is not why we're here today. I understand your position. You have a concussion. But let's*
20 *get back to the matter on the calendar. The respondent But you want to know what they documentation—I*
21 *submitted with the court what my response is. So for future reference, do you want to know which exhibit it is?*

22 *The court: Yes. The Respondent: So the medical concussion in a responst to attorneyis Exhibit . The second—It*
23 *says(umintelligible) The respondent: It says "spousal support reconfirations". I submitted that—The court:*

24 *That's not---hearing is not before the court today Please be aware she fails to acknowledge the context of our*
25 *dialogue. Is she incompetent or is this her way of confusing things? Again, this is a Freudent Slip because she*
26 *knows she ordered an unfair spousal support order. I am simply telling her where to find them. White people*

27 RESPONSE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL U.S. CODE 144 . BIAS OR
28 PREJUDICE OF JUDGE MOTION TO DISQUALIFY JUDGE SARAH HEIDEL FOR JUDICIAL MISCONDUCT
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1 in power of have a history of using such tactics of diverging the attention and changing the subject to confuse
2 matters. This is something she does consistently, I ve shown a clear pattern. The respondent: I am letting you
3 know I have documentation for that. So Concussionis G. I also have a severe back injury, which is wven
4 alittel bit more severe than my concussion. And just to let you know, I think last time I sat down, you kind of
5 got annoyed with me. I was not aware of the procedure. I did that because I have a severe back injury and
6 suffered for a back injury for almost ten years now.

7 Every single court hearing she attempts to tarnish my credibility. I am pointing out my deficiency because I truly
8 struggle. My husband let me Jan 5, 2018. I could have filed for spousal support immediately. Instead I drive ride
9 share in a SUV for part of the year. Then Uber retired my vehicle after I was in a collision. I then rented a vehicle.
10 Again, I was rear-ended. The finally I was rear-ended a 2nd time in four months. I had major whiplash. I had a
11 horrible concussion. Since this collision occurred, I have a feeling like my head is submerged in water. My ears
12 constantly ring, I have short term memory issues, and I train of thought. I have a severe sleep disorder; I am
13 scheduled for a sleep study on Dec 13. I could have asked for spousal support a year before I did. But my husband
14 is an alcoholic. For a year I prayed he would get better. I thought he was going to AA, and was in therapy. But
15 instead he was plotting on me. I am a human being. More so, I am a woman. Then I am black woman. I have
16 challenges after challenges, because I was in a horrible toxic marriage for so many years. I developed the tools to
17 endure emotional stress and pain. This woman is a Family Law judge, she should no way should be sitting on a
18 bench. If she has a disdain for black woman that is her prerogative, but she has a duty to be impartial, I have more
19 than demonstrated her inability to be objective and judicial. The reason why I think it's important that she
20 acknowledged my deficient is so she can be understanding and make allowances when I am in a hearing. I do not
21 have representation I am already at a disadvantages. I know it is because my husband is white and I am black.
22 Now the issues of discovery. Ariel Carter claims to sent a request or Interrogatories. I have been unemployed since
23 2008. I tried to do ride share 2018. Other than that I have virtually NO income. I went one year without requesting
24 any spousal support. Pertaining to the Interrogories, after viewing them. There is a not a question that concerns me.
25 Why would I not respond to a discovery request. If an impartial person reviews my entire case, you will come to the
26 conclusion that the opposing attorney is employing deceptive and unethical tactics. Her job is to represent her client

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1 and do so as economically as possible. We have since went before another judge. The 2nd judge asked for
2 Declaration of Disclosure. This is essential to the divorce. My husband's attorney and Judge Heidel has never
3 mentioned this necessary document. Opposing counsel had blatantly lied, she has never submitted any tangel
4 efficence. In Ariel Carters response to spousal support she included photos from my Instagram. She was so sloppy in
5 her deceit she didn't read the caption. The photo was taking at a different event at a different time. My husband
6 claimed that he gave me money to pay a bill and I didn't pay again I submitted evidene that he is blatantly lying.
7 Ariel Carter request for evaluation and she doesn't even submit evidence of the evaluators credentais. Ariel Carter is
8 reckless with her deception because she knows I am black woman and she is well aware of how the general
9 population views black woman. In the opposing attorneys tactics further demonstrates that this judge is racist and
10 favors my white husband. Judge Sarah Heidel heard the hearing on June 21 there were only the court officers in
11 court. Every single person in the court room was aware of what she was doing and why she was doing. The biggest
12 injustice is when the JUDGE, this pillar of our society behave in such a way, even if these court employees know
13 that what she is doing is wrong, it is a great chance they will behave in a similar fashion if they find themselves in an
14 opposition with a person of color because Judge Sarah Heidel had given the unconscious message that this is
15 acceptable. In the June 21, 2019 hearing where I am being made to answer a serious allegation, Judge Sarah Heidel
16 does nothing to question the opposition again ,she bullies me.

17 *Exhibit I June 21, transcripts Page Page 14 line 17*

18 *The Respondent : I responded to the letter May I speak to this? I have evidence the email between Charles Major.*
19 *What she saying is she spoke to my attorney. He is no longer my attorney. And this exactly what I am asking for a*
20 *continuance because you denied it. I have an email dated on – where she and he talked about moving everything on*
21 *the calendar, the June 15 to July. In the e-mail, there's nothing about the June 21st hearing. I didn't find out about the*
22 *Motion to Compel until I came back from my daughter's graduations. And I asked them, "did you hear anything*
23 *about Motion to compel" no one knew anything about it. No one knew. It's entered into evidence, the email between*
24 *she and the attorney moving it. A reasonable person would believe, if this is a matter and you're two attorneys why*
25 *would you discuss every other matter except for this one? It doesn't make any sense. I spoke to Alicia. I have an*
26 *email. I have phone records of March 18th, no one attempted to discuss with me. I have no reason to not respond. It's*

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1 my benefit to show that I have nothing. And I hope you're going to allow me to prove they have tons of stuff they
2 submitted, and they lied. His FL-150 has lies on it. And I would like to cross-exam him about all the lies that he put
3 on there. And I'm going to say to your honor, my husband will lie, but he would not lie to you. The only reason why
4 I'm going to give you grace, brother is because he's doing it on the lead of his council. The Court: Ok That's not
5 relevant. The Respondent: He is lying? The court: Any misrepresented the income and expense declaration are not
6 part of a Motion to Compel. The Respondent: I did not say that ma'am. What I want to do is show he is a liar and
7 not above lying to the court. My position is they lied to the court. They continuously submit false information and
8 when I dispute it with written information to show they're lying the court refused to acknowledge it. Ms. Carter: I
9 would object at this point. I believe the respondent is making many unfounded statements, many false statements—
10 The Respondent: Please allow me to prove it. Ms. Carter --- against myself and my ---The Court: Ms. Gibson, you,
11 can't interrupt. The Respondent: But I was talking she interrupted. The Court: Ma'am you interrupted—you were
12 interrupting. Respondent: I was talking. She started speaking but again I don't expect you to rule in my favor ma'am.

13 I know what this

14 I understand there are court procedures If you notice she does not address my concerns. Ariel Carter only gives
15 verbal testimony. I have submitted conflicted evidence again aand again. Judge Heidel only bullies me. She blatantly
16 ignores my concerns by trying to make me look like angry black woman who has not self-control. I was married for
17 23 years. I was married to an alcoholic for 23 years because I am patient and compassionate. This woman
18 continuane to bully be and fails to do anything to verify the lies my white male privilege husband submits to the
19 court. There are 20 more pages. I can't read anymore. I would like the opportunity to have a court hearing to prove
20 my position.

21 Judge Sarah Heidel ruled against me on every matter. I attempted to file a Motion to disqualify Judge Sarah Heidel
22 on Aug. 30, 2019. I attempted to File a Motion to Disqualify at the Pomona court. The clerk said she didn't know
23 what to do. She went and got Arturo Quintero. He tried to get me to complete the premeprty challenge. I told him
24 that isn't what I was trying to do. I told him I was file a Motion to Disqualify He was very resistant. He said it was
25 dumb, that I would go before the judge to request that she be removed. I told him I understood. He said , he wasn't
26 sure what to do. He said I had to talk to the judge. I pulled out my phone and asked him to repeat himself. He then

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1 threatened to call security on me. I have Arturo Quintero on video threatening me to call security, when I am only
2 trying to exercise my rights. See Exhibit M Screenshot of the video of Arturo Quintero threatening me. I received a
3 notice from the court declining the Motion to Disqualifying stating I didn't serve the judge. Arturo Quintero never
4 officially filed the Motion. Judge Sarah Heidel referred the case to the LA court. Since then my husband's attorney
5 filed a Motion To Declare Karrie Gibson a Vexatious Litigant. Ariel Carter filed this back in the Pomona Court
6 with Judge Sarah Heidel because she knows Judge Heidel is racist and will not fairly hear a case. She is attempting
7 to strip me of my rights. When we heard in the LA court Ariel Carter's demeanor was much different then that when
8 she is in front of Judge Sarah Heidel. Although, Ariel Carter again lied to the judge about meeting and conferring.
9 I would like to exercise my rights to Due Process under the law. I would like the opportunity to demonstrate. The
10 my rights under the 14th Amendment as been violated. I would like to do this formally in a court of law.

11
12 The weighed evidence shows Judge Sarah Heidel bullied me. The weighted evidence will show that Judge Sarah
13 Heidel show extreme bias. The weighed evidence shows that Judge Sarah Heidel demonstrated bias by omission.
14 Judge Sarah Heidel failed to question evidence and testimony submitted to the court by my white husband's attorney.
15 There was a bogus restraining order filed, and other judge dismissed the restraining order, finding my husband to
16 being less than honest. Judge Sarah Heidel has tried to characterized me as an angry black hostile woman when I
17 have continuously show respect to the court with no avail. Judge Sarah Heidel has not abided by the law. Judge
18 Sarah Heidel deprived me, Karrie Gibson of Due Process. Judge Sarah Heidel violated my rights under the 14th
19 Amendment.

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