V I R G I N I A:

IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

CHERI SMITH,	)	
Plaintiff,	)	
	)	
v.	)	**Chancery No. 53360**
	)	
WESLEY C. SMITH,	)	
Defendant	)	

#70 - OBJECTIONS TO FINAL DECREE & MOTION TO RECONSIDER/VACATE

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COMES NOW the Defendant, Wesley C. Smith, and makes the following objections to the FINAL DIVORCE DECREE entered June 9th, 2006 and ask the cort to reconsider or vacate the order. The Defendant states as follows:

1. The Court never obtained subject matter jurisdiction as jurisdiction for divorce is only via statute and the Plaintiff did not comply with the relevant statutes needed to give the court jurisdiction. The Defendant hereby incorporates by reference #58 - Motion To Dismiss Due To Lack Of Service.

2. The Court never obtained personal jurisdiction as the Plaintiff did not serve the Defendant with a copy of her Bill Of Complaint and VA code requires service according to statute and prohibits jurisdiction based on receiving a copy by means other than that proscribed by statute. The Defendant hereby incorporates by reference #58 - Motion To Dismiss Due To Lack Of Service.

3. The Court abused its discretion by proceeding with the trial without making a ruling on the Defendant's #58 – MOTION TO DISMISS DUE TO LACK OF SERVICE which asked for the case to be dismissed due to lack of jurisdiction, the court filed to make any reference to any part of the record that would contradict the Defendant's claim that the court did not have jurisdiction. The court should have made a ruling and shown where the record documented jurisdiction before proceeding with the trial or should have dismissed the case.

4. Indeed it appears the Court never even bothered to read #58 – MOTION TO DISMISS DUE TO LACK OF SERVICE as Judge Potter simply stated the court had jurisdiction with no reference at all to the record - an approach documented as useless in the motion:

> A judge's allegation that he has subject-matter jurisdiction is only an allegation (Lombard v. Elmore, 134 Ill.App.3d 898, 480 N.E.2d 1329 (1st Dist. 1985); Hill v. Daily, 28 Ill.App.3d 202, 204, 328 N.E.2d 142 (1975)); inspection of the record of the case has been ruled to be the controlling factor. If the record of the case does not support subject-matter jurisdiction, then the judge has acted without subject-matter jurisdiction. The People v. Brewer, 328 Ill. 472, 483 (1928) ("If it could not legally hear the matter upon the jurisdictional paper presented, its finding that it had the power can add nothing to its authority, – it had no authority to make that finding.").

5. Judge Potter's claim to jurisdiction is based on his claimed "facts" of the case that the parties were married and separated and "… thus as a matter of law that it has jurisdiction to hear and determine this cause…" obviously this statement of Judge Potter is legally incorrect. A judge has no authority to issue a divorce simply because two people marry and separate. Divorce is regulated by statute, not general jurisdiction, and the statutes proscribes the only legal manner in which a court may grant a divorce and it involves such things as filing a bill of complaint, service on the Defendant, etc. none of which were mentioned by Judge Potter in his claim to jurisdiction. Judge Potter's vague reference to "a matter of law" without citing which law he claims also makes his ruling useless, he needed to cite specific statues and specifics in the record to demonstrate compliance with those statutes.

6. If by some wild (or willful) stretch of the imagination the Court is considered to have obtained both subject matter and personal jurisdiction, the court lost jurisdiction by its biased actions in the case and violations of Due Process, including but not limited to awarding temporary custody at a hearing not about custody, preventing the Defendant from properly presenting evidence and witnesses, by holding an illegal ex parte hearing, by knowingly issuing an illegal unconstitutional order purporting to restrict the Defendant's first amendment free speech rights, by refusing to vacate/void the illegal order, refusing to rule on each motion made by the Defendant, giving preferential scheduling to the Plaintiff's motions, refusing to enforce rules violated by the Plaintiff's attorney, refusing to make the Plaintiff comply with discovery or issue sanctions for the Plaintiff's failure to comply, etc.

7. The court also erred in ruling December 2002, as the date of separation, a date neither party claimed as the date of separation, and in spite the parities continuing to cohabitate (using the Virginia Court of Appeals definition of cohabitate) with each other until at least June 2003. Apparently Judge Potter did not read the Defendant's #55 – MOTION TO DECLARE THE DATE OF SEPARATION which makes it clear that multiple cases have ruled that cohabitation does not require sexual relations, as

cited in Jacobi v. Jacobi , Schweider v. Schweider, Rickman v. Commonwealth, Ott v. Ott, Carter v. Carter. Indeed if Judge Potter had read the motion he would have been aware that the parties situation did not even begin to approach the separation of Ott v. Ott which was ruled to still be cohabitating. The Defendant also testified that the Plaintiff had made statements indicating she was aware of what steps were required to be considered legally separate and that she did not take those steps until after June of 2003, thus indicating her lack of intention to separate.

8. The Court erred in granting divorce based on one year separation when the parties had not been separated for one year at the time the Bill Of Complaint was filed. The Defendant hereby incorporates by reference: #62 - Motion to strike count III of amended bill of complaint. Clearly this is a case of the court refusing to exercise its jurisdiction to hear the case on the merits and just wanting to take a short-cut.

9. The Court erred by ruling on the basis of one year separation instead of adultery. In this case, even using the incorrect date of Dec 31, 2002 the parties were only separated 6 months when the Plaintiff filed for divorce, that is 6 months before separated for one year, and per the ruling in HARRELL v. HARRELL in which the wife filed for divorce only 10 days early and the Virginia Court of Appeals ruled it invalid due to being filed prematurely, surely 6 months is also premature.

10. The Court erred by granting the Plaintiff a divorce when no grounds for divorce at the time of filing were proven, without which the Court had no jurisdiction see Beckner v. Beckner, 204 Va. 580, 583, 132 S.E.2d 715, 717-18 (1963) (holding that **"[t]he act relied upon for divorce must be alleged and proved to have occurred prior to the bringing of the suit**"). Given the Plaintiff did not prove, nor even attempt to prove any grounds other than one year separation, and that the parties were not separated one year as of June 11, 2003 when the Plaintiff filed, and the original BOC did not contain grounds of one year separation, the Court had no authority to grant a divorce on the grounds of one year separation. The counter claim of the Defendant of adultery committed by the Plaintiff does not have a one year time limit, the Plaintiff admitted to the adultery, the Defendant had submitted photographs and e-mail supporting the claim of adultery, thus the only grounds available to the court was the adultery claim in the Defendant's cross-bill.

11. The public policy of the Commonwealth is 'to foster and protect marriage, to encourage the

parties to live together, and to prevent separation, marriage being the foundation of the family and of society, without which there would be neither civilization nor progress.'" McEwen v. McEwen, 60 Va. Cir. 401, 404 (2002)(quoting Shelton v. Stewart, 193 Va. 162, 166, 67 S.E.2d 841 (1951)). Because of this public policy, the Commonwealth provides for the regulation of marriage as a means for the dissolution of marriage, not to facilitate divorce. Id. at 405, see also Chattin v. Chattin, 245 Va. 302, 427 S.E.2d 347 (1993). The order and indeed the way the court has handled the entire case has been in violation of this state policy. Awarding sole custody to and "child support" payments to a parent to admitted to adultery, admitted to domestic violence, and admitting to interfering with the parent/child relationship of the Defendant is a clear and blatant effort to facilitate and encourage divorce and thus a violation of state policy.

12. The court abused its discretion by not recusing Judge Potter, who is both well known for his prejudice against fathers, his refusal to uphold his oath of office, his refusal to comply with the constitutions of the United States and the Commonwealth of Virginia, his refusal to comply with the relevant state laws, and his demonstrated bias in this case, including refusing to vacate an obviously unconstitutional order. The Defendant hereby incorporates by reference #60 - Defendants Motion To Disqualify/Recuse Judge Potter, and #47 - Motion To Recognize Right Of Freedom Of Speech And To Vacate, Or Recognize As Void, All Orders That Deprive Defendant Of That Right.

13. The court abused its discretion by making findings of 'fact' that either contradicted the evidence shown in court or were made with no supporting evidence at all. An example of this would be the court stating the Defendant's apartment is unsuitable, yet the Plaintiff did not present any evidence at all relating to his apartment. The only evidence presented in court about the apartment was by the Defendant who demonstrated that it was in a great location for our son, with lots of activities our son would enjoy, with close family support, etc. There simply was no evidence presented in court to justify this opinion of Judge Potter, he was apparently grasping at straws to support his predetermined custody ruling. Indeed the Plaintiff presented little if any evidence to support her case for custody while the Defendant presented photos documenting the activities he participated with his son during visitation.

14. Judge Potter also abused his discretion by his abusive statements during the trial such as when he

stated the Defendant didn't deserve visitation, when there was no evidence presented to support that conclusion and even his own ruling that provides visitation, contradicts that statement.

15. The court also demonstrated bias by reading into the record portions of 'evaluations/reports' that supported the Plaintiff's case while refusing, even when requested, to read the portions that would hurt her case. Judge Potter refused to read the portions that documented the Defendant is an 'excellent father' that the Defendant has no mental or emotional problems, etc. It was clear from his conduct that Judge Potter was trying to read into the record statements that would help the ruling he wanted to make rather than reading a fair selection of statements.

16. The court further showed its gender bias by continuing to scare the Defendant into giving up his first amendment right to freedom of speech, and ordering him not to exercise his constitutional right to be a parent, that is ordering the Defendant to stop legal, lawful acts while at the same time refusing to order the Plaintiff to stop committing adultery which is illegal and harmful to our son.

17. The court abused its discretion by not approving the motion for a change of venue when it was shown that Judges and/or their staff were engaged in improperly reviewing facts/evidence other than that presented in court by viewing the Defendants website, and in light of the fact that multiple judges had refused to follow the constitution and void/vacate the illegal order violating the free speech rights of the Defendant. The Judge should have limited his knowledge of the case to that presented in court rather than he or his staff doing their own "research". The Defendant hereby incorporates by reference #68 – Motion For Change Of Venue

18. The Defendant has not been provided Equal Protection under the law as required by the constitution. By reputation, and by state statistics, custody is awarded generally on the basis of gender not the factors required by statute. The Judges, and later security personnel, have refused to let the Defendant record hearings while at the same time allowing attorneys to bring and use recorders without restriction. Such action by the court puts the Defendant at a disadvantage representing himself compared to a Virginia State Bar member representing the Plaintiff. This is more egregious given the Defendant has ADD and desired to record instead of relying on memory. Allowing the Defendant to record was a reasonable accommodation for his disability that should have been provided per federal law. The court

failed to provide the Defendant with any accommodation for his disability. The allowing of recording devices for attorneys but not pro se parties is made worse by the fact the Defendant is indigent and can't afford to have an court reporter at each hearing. It should be noted that the Judges stopped letting the Defendant record hearings when the Defendant offered to use a recording to show that Ms. Vardy had intentionally lied to the court. Rather than impose a sanction for her misconduct the court decided to help prevent the Defendant from having evidence of her lies in the future.

19. The Court abused its discretion by ruling on the Plaintiff's Motion For Sanctions that was not served on the Defendant until the very day (Sunday) before trial and did not allow the Defendant time to prepare to defend against it. The court should have also provided the Defendant with both a jury and an attorney, as requested, before hearing a motion for making any ruling to hold the Defendant in contempt. The Defendant has repeatedly made motions for a jury and attorney. The Defendant hereby incorporates by reference #59 - Defendants Motion For A Jury Trial, #46 - Motion For Use Of Escrow Funds For An Attorney, #34 - Defendant's Motion For An Attorney, #42 - Defendants Demand For A Virginia Constitution Article 1, Section 11, Jury Trial In A Civil Case, and #31 - Defendant's Demand For A Jury Trial

20. The Court has shown bias by making rulings on the Plaintiff's motions while not ruling or delaying ruling on the Defendant's motions. The court has failed to rule on the following Defendant's motions including but not limited to: #54 – MOTION TO RECONSIDER/REHEAR MOTIONS #40 THRU #53, #56 – NOTICE OF FRAUD BY LORETTA VARDY, #58 – MOTION TO DISMISS DUE TO LACK OF SERVICE, #59 - DEFENDANTS MOTION FOR A JURY TRIAL, #60 - DEFENDANTS MOTION TO DISQUALIFY/RECUSE JUDGE POTTER, #61 – MOTION TO STRIKE AMENDED BILL OF COMPLAINT, #62 – MOTION TO STRIKE COUNT III OF AMENDED BILL OF COMPLAINT, #63 – MOTION TO STRIKE PREVIOUSLY LITIGATED CLAIMS FROM THE BILL OF COMPLAINT AND AMENDED BILL OF COMPLAINT, #64 – MOTION TO STRIKE GAL REPORT, #69 – REQUEST FOR JUDICIAL NOTICE OF UTAH LAW.

21. The Court violated the Defendants constitutional right to a jury trial as guaranteed by both the Federal and Virginia Constitutions. The Defendant hereby incorporates by reference #59 - Defendants

Motion For A Jury Trial, #42 - Defendants Demand For A Virginia Constitution Article 1, Section 11, Jury Trial In A Civil Case, and #31 - Defendant's Demand For A Jury Trial

22. The Court violated the Due Process rights of the Defendant by not compelling the Plaintiff to comply with Discovery, not forcing the Plaintiff to comply with even the limited ruling to compel, and by improperly quashing subpoena's issued by the Defendant. The actions of the court have been to consistently deny the Defendant access to evidence with which to defend himself. Preventing the Defendant from having access to relevant documents, and even access to his son for over one year prior to trial significantly impaired the Defendant's ability to present a credible case. The Defendant hereby incorporates by reference #66 - Reply To Vardy Motion To Quash, #65 - Reply To Vanderhye Motion To Quash, #50 - Motion To Compel And Motion For Sanctions, #44 - Reply To Motion To Quash And Motion For Sanctions For Obstruction Of Discovery By Plaintiff, #43 - Motion For Sanctions For Obstruction Of Discovery By Mr. Fahy, #39 - Motion For CPS Records, #38 - Reply To Motion To Quash, and Defendant's Statement Of Facts For Saic Motion To Quash With Attached Audio CD

23. The court abused its discretion by not striking the GAL report which was grossly deficient, leaving out such significant items as child abuse complaint with CPS, our son's diagnosed depression, behavioral problems at school, the mother's problem with rage, etc. It's obvious that the GAL 'report' was totally inadequate on which to base any judgment. The Defendant hereby incorporates by reference #64 - Motion To Strike GAL Report. The GAL report was also in violation of § vscr-6:2-3.4 because the GAL did not present any evidence (admissible or otherwise) or any witnesses, and did not even bother to attend the entire hearing, especially in light of his refusal to comply with a subpoena to provide documentation as to any training or education, his report was nothing more than his personal opinion and was prohibited by rule 6:2-3.4(f):

> § vscr-6:2-3.4 A lawyer shall not: … (f) In trial, allude to any matter that the lawyer does not reasonably believe is relevant or that will not be supported by admissible evidence, assert personal knowledge of facts in issue except when testifying as a witness, or state a personal opinion as to the justness of a cause, the credibility of a witness, the culpability of a civil litigant or the guilt or innocence of an accused.

24. The court abused its discretion by refusing to remove Ronald Fahy as GAL when it became obvious that Ronald Fahy was not making a good faith effort to represent our son and that he was making

no attempt to follow the state guidelines for GAL's. Even such gross misconduct as not attending a hearing on suspending visitation, or attending the final hearing on custody was condoned by the court. The Defendant hereby incorporates by reference: #64 - Motion To Strike GAL Report, #48 - Motion To Remove Ronald Fahy As Guardian Ad Litem, #30 - Motion For Sanctions Against Mr. Fahy, Motion To Reconsider Denial Of Motion To Appoint A New Guardian Ad Litem, Motion To Appoint New Guardian Ad Litem.

25. The court abused its discretion by not allowing proper cross-examination of Ronald Fahy.

26. The court abused its discretion and indicated its predetermined prejudicial ruling by inviting the GAL to leave the final divorce/custody hearing before the Plaintiff or Defendant has presented any evidence related to custody.

27. The court abused its discretion by not allowing sufficient time for the trial, it was clear the court was only interested in hearing about equitable distribution and did not allow sufficient time for testimony/evidence about custody.

28. The court abused its discretion by violating the Full Faith And Credit Act by not taking judicial notice of the laws of Utah where the marriage contract was entered into and where a marriage has more meaning than apparently one created in Virginia. The court only recognized the Utah marriage to the extent there was a marriage to dissolve but did not give full faith and credit to a Utah marriage in which fidelity as required and for which adultery would treated more seriously for both equitable distribution and for custody.

29. The Court has violated the Defendant's constitutional rights as a parent without indicating any compelling state interest to justify interfering with his constitutional rights as a parent. The Court's rulings are in violation of Supreme Court precedents recognizing constitutional rights of parents.

30. The Court's rulings are in violation of Virginia state law that prohibits use of gender as a factor for deciding custody. It's widely accepted that gender is the main (or only) criteria the Prince William County Circuit Court uses in making custody determinations.

31. The Court abused its discretion by not striking claims from the Bill Of Complaint that were previously litigated and that res judicata and collateral estoppel should have prevent the Plaintiff from

being allowed to re-litigate those issues. The Defendant hereby incorporates by reference: #63 - Motion To Strike Previously Litigated Claims From The Bill Of Complaint And Amended Bill Of Complaint

32. The Virginia state laws regarding custody, including but not limited to § 20-124.3, § 20-124.2, are unconstitutional as they claim to give the judge the ability to violate the constitutional rights of parents without a showing that the parents are unfit. They are also unconstitutional as applied as they are not applied in a gender-neutral manner but instead are applied in a manner as to favor mothers. The states laws about custody are also are both **arbitrary** and **discriminatory** as applied.

33. The award of sole custody, especially when based on gender and given that the court and state do not enforce visitation in the same manner as 'child support', is unconstitutional by being cruel and unusual punishment, and violating the equal protection clause.

34. The Court has violated the First amendment freedom of speech rights of the Defendant and Judge Potter in refusing to vacate/void the illegal order has refused to honor his judicial oath of office and by refusing to follow his oath and uphold the constitution the court has lost jurisdiction (if it ever had jurisdiction). The Defendant hereby incorporates by reference: #47 - Motion To Recognize Right Of Freedom Of Speech And To Vacate, Or Recognize As Void, All Orders That Deprive Defendant Of That Right, #54 - Motion To Reconsider/Rehear Motions #40 Thru #53.

35. The Defendant objects to page 8(c) as it may be vague and ambiguous and may be construed to restrict his first amendment right to free speech. Any attempt to restrict his first amendment rights is unconstitutional.

36. The court erred by allowing testimony of a witness who was not previously disclosed to the Defendant.

37. The Court has engaged in improper conduct during the entire history of this case starting with issuing a surprise custody ruling in Sep 2003, continuing with illegal Ex Parte hearing to suspend visitation, to refusing to enforce discovery, refusing to issue sanctions against the Plaintiff for violations and fraud, for respecting the Plaintiff's "right" to commit adultery even though prohibited by law, allowing her to claim the 5th when clearly it does not apply, yet at the same time not recognizing the free speech or parental rights of the Defendant.

38. The Court has erred by not making a ruling in the best interest of our son. Our son clearly desires and needs to be allowed to spend more than one weekend a month with his father. The result of previous depravations of visitation has resulted in him performing poorly in school and being diagnosed with depression. If the court had even any pretense at following "best interests of the child" it would have made a ruling that granted him frequent time with his father.

39. The court erred by allowing use of amended financial statements that were not provided in time for the Defendant to review them prior to trial and after it had been shown the previous versions were intentionally fraudulent. The Defendant hereby incorporates by reference: #56 - Notice Of Fraud By Loretta Vardy.

40. The court erred by using proven inaccurate financial statements - see #56 - Notice Of Fraud By Loretta Vardy. Some of the noted inaccuracies are: page 16 #16 "The Court finds that the electricity bill in the amount of $1 ,502.00 which was paid by the Plaintiff…", page 16 #17 "The Court finds that the Comcast cable bill, in the amount of $275.00 which was paid by the Plaintiff…" page 16 #18 "The Court finds that the local telephone service in the amount of $258.00 has been paid by the Plaintiff…", and pag 16 #20 The Court finds that the waste disposal bill in the amount of $193.00, is the Plaintiff's bill to be paid by the Plaintiff. The Defendant had submitted proof, including bank statements, to show that he paid the bills in question, an assertion not disputed by the Plaintiff. Also page 18 #28 both parties agreed that the Defendant no longer owes, and has not since about Dec 2004, owed $60,000 to Dow Credit Union. This is further shown by the order itself which documents $50,000 used to help pay for the default on the loan. The court either didn't pay attention or didn't care to get its facts straight.

41. The court also erred in determining the equitable distribution award. The court mentions § 20-107.3 but does not seem to have applied it. The Court did not use the evidence submitted by the Defendant as to the monetary contributions of both parties and the Plaintiff did not present any evidence as to monetary or non-monetary contributions. The court also ignored the large negative monetary contribution of the Plaintiff's adultery both to the destruction of our family and to incurring large legal costs. The court completely ignored the "The circumstances and factors which contributed to the dissolution of the marriage…" given that the rage, domestic violence, and adultery, by the Plaintiff contributed to the dissolution of the marriage.

42. The court erred by making the Defendant share the burden of paying for the Plaintiff's student loans for her MBA while at the same time not providing him any benefit from her MBA.

43. Page 15 #8 fails to mention it was the Plaintiff who abandoned the vehicle.

44. The order of "child support" violates the constitutional rights of the Defendant. All the state/federal laws about child support without a showing of neglect are unconstitutional. Noting in the marriage contract, nor constitution give the court the power to award to the Plaintiff the right to deny the Defendant the ability to chose where to live, where to work, what career to pursue, how much money to spend on his son, or what items he will provide to his son. The fact that the Plaintiff slept around, and chose to end the marriage does not give her any right to dictate how much the Defendant must earn in the future nor how much he must pay her. Indeed as the state has no requirement that 'child support' actually be spent on the child, it amounts to nothing more then discussed alimony.

45. The court also erred in determining an arrearage. As visitation is tied to child support, the court is unable to deny a fit parent visitation while still ordering 'child support'. As the Defendant was denied visitation for 17 months he cannot be required to pay support for that time period. The court can't deny a parent all meaningful parental rights and still require parental obligation, rights and obligations are tied together and can't be separated by the court.

46. No compelling state interest was demonstrated for requiring support. While the state may have an interest in keeping children from being a burden financially on the state, no evidence or claim was made that our son was not adequately provided for, thus any state intervention on the parental right to chose how/what to provide for a child is unconstitutional. Indeed in this case the coercive and unfair nature of how the state implements "Child Support" has and will continue to result in the Defendant having a lower income and lower ability to provide financial support for his son, thus an award of "Child Support" in this case goes against the states interests. However it should be noted the award of "Child Support" does indeed further the interests of the Virginia State Bar and its members but that isn't a legal reason to restrict the parental rights of the parties.

47. The duty to support children is based largely upon the right of a parent to their custody and control. Patron v. Patron, 40 Va. Cir. 379 (1996); Butler v. Commonwealth, 132 Va. 609, 614; 110 S.E.

868 (1922). A parent cannot be compelled to pay support unless he or she has refused or failed to provide for them where he or she lives. Butler, 132 Va. at 614.

48. Any claim of child support by the Plaintiff would be barred by the statue of limitations. The actions of the Defendant in helping her conceive took place in 1996 well over two years before she filed for custody in 2002.

49. The act of conception also took place outside of the state of Virginia before the parties moved to Virginia. Virginia has no authority or jurisdiction to punish the Defendant for engaging in consensual sexual relations with his wife, especially when it did not take place in Virginia. Given the act of sex with his wife was not illegal nor punishable by a monthly fine at the time it is EX POST FACTO to now punish the Defendant for that act, as such an order of 'child support' is unconditional as the constitution forbids EX POST FACTO laws.

50. Given the time period and location, the only basis for the claim of support is that the Plaintiff decided to end the marriage. The state has no power to punish the Defendant for actions of the Plaintiff. If the Plaintiff had not chosen to file for custody/divorce everyone would recognize the state would have no business ordering support unless neglect became an issue. The actions of the Plaintiff cannot grant the state power to take away rights of the Defendant. The ability of the Defendant to choose how, when, where to work and how, when, how much to provide financially for his son should remain the same as before the Plaintiffs actions occurred.

51. An order of support with the coercive state laws also amounts to a bill of attainder, reducing the Defendant to indentured servant status or as an outlaw, given the state laws deny him the same legal due process rights as accused murderers. Bills of attainder, indentured servants and outlawry are all unconstitutional.

WHEREFORE the Defendant requests the order be vacated, ruled void and/or modified to correct the above objections.

Respectfully Submitted,
Wesley C. Smith

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Wesley C. Smith, Defendant
5347 Landrum Rd APT 1, Dublin, VA 24084-5603
liamsdad@liamsdad.org - no phone

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing motion was served to Loretta Vardy and Ronald Fahy (GAL) via U.S. mail, this 29th day of June 2006.

_____
Wesley C. Smith