

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Lisa Broomfield, being duly sworn, hereby deposes and says:

1. I am over the age of 18 and am a resident of **Texas**. I have personal knowledge of the facts herein, and can testify thereto; and
2. I suffer no legal disabilities and set forth the facts below based upon personal knowledge.

PURPOSE OF AFFIDAVIT

1. This affidavit of Criminal Complaint is being made to provide evidence of crimes by the individuals named herein, and other yet unnamed court and government actors and individuals; and
2. This affidavit is being filed to create a record and request that the appropriate legal authorities take immediate action based on the evidence provided in this affidavit; to initiate a formal investigation and legal proceedings to ensure accountability and uphold the Constitution of The United States of America, the Constitution of the State of Texas and the rule of law; and
3. This affidavit is being filed to protect and preserve my rights and the rights of others who may have been affected by the misapplication of law, abuse of official capacity, official oppression and/or other acts of corruption at the hands of Panola County officials.

BACKGROUND OF AFFIANT

Affiant is a Land Title Professional, employed in the energy sector for 25 years, who is active in the Republican Party, served as Precinct Chair, Precinct 1, Panola County, Texas and as a Delegate to the 2024 Texas Republican Convention. Affiant is a member of the Panola County Conservatives, where she served as Treasurer, and she has served on the board of the American Heritage Girls, Troop TX0330. She is a mentor for Young Professionals in Energy. Affiant has been married to Steven Broomfield for 31 years and they have 17-year-old twin daughters and Permanent Managing Conservatorship of a 4.5 year old little boy. Affiant is an outspoken advocate of Christian and Conservative values and uses social media platforms to promote those ideals, and to call out corruption.

STATEMENT OF PURPOSE

This Affidavit is being submitted as evidence of crimes being committed by individuals in Panola County and systematically within the Panola County Government/Judiciary, and others acting under the color of law.

As is my Right under the Constitution of the United States, I have vociferously and doggedly spoken out against corruption, and specifically the corruption within the local system in Panola County. It is my belief and allegation Panola County officials have committed various acts under color of law, including official oppression, abuse of official capacity, and other acts and deeds and of criminal behavior set forth below, thereby violating my First, Fifth and Fourteenth Amendment rights.

Panola County, Texas has operated on its own set of rules for a very long time and made it so the citizens are afraid to speak out. Prosecutorial and judicial discretion are *wielded* based upon long standing interrelations within the system, between the system and the community and between the stewards of the system and the local drug trade/criminals. The citizens have no faith in our officials self-regulating to fix these problems. These crimes, along with other conspiracies and miscarriages of justice cannot go ignored. We the People,

have rights that are guaranteed by the Constitution of the United States of America and the Constitution of the State of Texas, and we need help!

MAXIM OF LAW: *Invitat culpam qui peccatum præterit*. He encourages a fault, who passes over a transgression.

Most all who receive this Affidavit/Complaint (as outlined below) has taken an Oath of Office that should be similar to:

Article XVI, Section 1, of the Texas Constitution outlines the official oath of office as follows: “I, _____, do solemnly swear (or affirm), that I will faithfully execute the duties of the office of _____ of the State of Texas, and will to the best of my ability preserve, protect, and defend the Constitution and laws of the United States and of this State, so help me God.”

In addition, before taking the oath of office and beginning the duties of office, each elected or appointed officer required to take the oath must also subscribe to the following statement:

“I, _____, do solemnly swear (or affirm) that I have not directly or indirectly paid, offered, promised to pay, contributed, or promised to contribute any money or thing of value, or promised any public office or employment for the giving or withholding of a vote at the election at which I was elected or as a reward to secure my appointment or confirmation, whichever the case may be, so help me God.” TEX. CONST., art. XVI, § 1.

This Oath requires each of you to take action when presented with evidence of corruption, unlawful conduct by another official, or the appearance of unethical/illegal behavior. This Affidavit/Complaint serves that purpose, as outlined below.

CONSTITUTIONAL GUIDELINES

Please take notice that “All political power is inherent in the people, and all free governments are founded on their authority, and instituted for their benefit...” (Texas Constitution, Article 2, Sec. 2).

Please take notice that We the People are endowed, by our Creator, with certain unalienable rights, that among these are life, liberty, and the pursuit of happiness.

The Declaration of Independence: “We hold these truths to be self-evident, that all men are created equal, that they are endowed, by their Creator, with certain unalienable rights, that among these are life, liberty, and the pursuit of happiness.”

Please take notice that the abrogation of a right is unlawful. Where rights secured by the Constitution are involved, there can be no rule making or legislation which would abrogate them.

U.S. Constitution, First Amendment: “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.”

U.S. Constitution, Amendment 14, Section 1: “All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No

State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

Maxim of Law: Minatur innocentibus parcit nocentibus. "He threatens the innocent who spares the guilty"

STATUTORY GUIDELINES

The following Guidelines are taken from the Texas Code of Criminal Procedure (TCCP):

Art. 15.03. MAGISTRATE MAY ISSUE WARRANT OR SUMMONS.

(a) A magistrate may issue a warrant of arrest or a summons:

1. In any case in which he is by law authorized to order verbally the arrest of an offender;
2. When any person shall make oath before the magistrate that another has committed some offense against the laws of the State; and
3. In any case named in this Code where he is specially authorized to issue warrants of arrest.

Art. 15.04. COMPLAINT.

The affidavit made before the **magistrate** or **district** or **county attorney** is called a "complaint" if it charges the commission of an offense.

Acts 1965, 59th Leg., vol. 2, p. 317, ch. 722.

Art. 15.05. REQUISITES OF COMPLAINT.

The complaint shall be sufficient, without regard to form, if it have these substantial requisites:

1. It must state the name of the accused, if known, and if not known, must give some reasonably definite description of him.
2. It must show that the accused has committed some offense against the laws of the State, either directly or that the affiant has good reason to believe, and does believe, that the accused has committed such offense.
3. It must state the time and place of the commission of the offense, as definitely as can be done by the affiant.
4. It must be signed by the affiant by writing his name or affixing his mark.

Which is then Submitted to the Magistrate (or DA, etc.):

CHAPTER 4. COURTS AND CRIMINAL JURISDICTION

Art. 4.01. WHAT COURTS HAVE CRIMINAL JURISDICTION. The following courts have jurisdiction in criminal actions:

1. The **Court of Criminal Appeals**;
2. Courts of appeals, other than the Court of Appeals for the Fifteenth Court of Appeals District;
3. The **district courts**;

4. The **criminal district courts**;
5. The county courts;
7. All county courts at law with criminal jurisdiction;
8. County criminal courts;
9. Justice courts;
10. Municipal courts;

As can be clearly seen, many receiving this Affidavit are responsible and have Jurisdiction over this matter and must accept this Affidavit/Complaint.

STATUTORY VIOLATIONS

PENAL CODE TITLE 8.

OFFENSES AGAINST PUBLIC ADMINISTRATION, CHAPTER 39. ABUSE OF OFFICE

Sec. 39.03. OFFICIAL OPPRESSION.

(a) A public servant acting under color of his office or employment commits an offense if he:

- (1) Intentionally subjects another to mistreatment or to arrest, detention, search, seizure, dispossession, assessment, or lien that he knows is unlawful;
- (2) Intentionally denies or impedes another in the exercise or enjoyment of any right, privilege, power, or immunity, knowing his conduct is unlawful; or
- (3) Intentionally subjects another to sexual harassment.

THE FOLLOWING CODE IS RELEVANT AS ONLY THE OAG OR OTHER OUTSIDE ENTITY CAN INVESTIGATE THIS CASE. The local authorities are known for corruption and have fiduciary relationships with the accused. Judge McPherson is the former ADA, thus the Panola County District Attorney's Office cannot be over any investigation involving the judiciary. Additionally, the Panola County District Attorney's Office has a reputation for selective prosecution and selective protection therefrom.

Sec. 39.015. CONCURRENT JURISDICTION TO PROSECUTE OFFENSES UNDER THIS CHAPTER. With the consent of the appropriate local county or district attorney, the attorney general has concurrent jurisdiction with that consenting local prosecutor to prosecute an offense under this chapter.

Added by Acts 2007, 80th Leg., R.S., Ch. 378 (S.B. [563](#)), Sec. 2, eff. June 15, 2007.

Sec. 39.02. ABUSE OF OFFICIAL CAPACITY.

(a) A public servant commits an offense if, with intent to obtain a benefit or with intent to harm or defraud another, he intentionally or knowingly:

- (1) violates a law relating to the public servant's office or employment; or
- (2) misuses government property, services, personnel, or any other thing of value belonging to the government that has come into the public servant's custody or possession by virtue of the public servant's office or employment.

MISCONDUCT BY LAW ENFORCEMENT & OTHER GOVERNMENT ACTORS

18 U.S.C. § 242

Deprivation of Rights Under Color of Law

This provision makes it a crime for someone acting under color of law to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States. It is not necessary that the offense be motivated by racial bias or by any other animus.

Defendants act under color of law when they wield power vested by a government entity. Those prosecuted under the statute typically include police officers, sheriff's deputies, and prison guards. However other government actors, such as judges, district attorneys, other public officials, and public school employees can also act under color of law and can be prosecuted under this statute.

Section 242 does not criminalize any particular type of abusive conduct. Instead, it incorporates by reference rights defined by the Constitution, federal statutes, and interpretive case law. Cases charged by federal prosecutors most often involve physical or sexual assaults. The Department has also prosecuted public officials for thefts, false arrests, evidence-planting, and failing to protect someone in custody from constitutional violations committed by others.

A violation of the statute is a misdemeanor, unless prosecutors prove one of the statutory aggravating factors such as a bodily injury, use of a dangerous weapon, kidnapping, aggravated sexual abuse, death resulting, or attempt to kill, in which case there are graduated penalties up to and including life in prison or death. If charged in conjunction with 18 U.S.C. § 250, as noted below, all sexual assaults under color of law are felonies.

NOTE. I am not an attorney, but a private citizen. I am not responsible for outlining every possible crime committed, but merely to provide enough for **Probable Cause**, which burden is met with the following Statement of Facts.

STATEMENT OF LIMITED PRESENTATION OF FACTS

This affidavit does not include all the facts known to me, but only those facts relevant and sufficient to establish probable cause. I have no duty to provide evidence to the accused, nor do I have any responsibility to conduct any investigation that falls under the purview of anyone receiving this Affidavit. I have met my burden as this Affidavit/Complaint establishes probable cause on its face. (END – rest of page intentionally blank)

STATEMENT OF FACTS - COMPLAINT

I, **LISA BROOMFIELD** have personal knowledge of the following and request that the criminal and statutory violations outlined below, be investigated and prosecuted according to law.

1) Eric Scott "Rick" McPherson

- a. While employed by the District Attorney's office, McPherson had personal knowledge of criminal cases involving Carly Asher Jones relating to two separate grand jury indicted felony charges. 1) for burglary 2) for hindering apprehension of a known felon, separate offenses on separate dates.
- b. McPherson, as ADA prosecuted the burglary case against Carly's common-law husband, Brandon Bounds who was indicted for the same burglary as Carly Asher Jones, though the only physical evidence was a fingerprint of Carly Asher Jones and her admission that she did in fact break out a window, *and* she was the one present and in possession of remaining recovered items. (she sold or otherwise disposed of some items, including a rifle)
- c. McPherson, as ADA knew or should have known that the sworn statement of Carly Asher Jones denying that she was involved in Felony III Hindering Apprehension of a Known Felon charge, contains obviously and provably false statements. This false statement was the basis for the felony charge being DISMISSED. This false statement by Carly Asher Jones directly contradicted the Deputy's report, and the body cam footage clearly documents the facts of what actually occurred. Additionally, other parties mentioned in Carly Asher Jones affidavit will testify that the statement is a falsification.
- d. McPherson transitioned from the District Attorney's Office to County Court at Law Judge and then executed both orders of dismissal for the charges against Carly Asher Jones.
- e. McPherson then presided over Request for Modification of Custody filed by Jones vexatiously and in response to Affiants having filed a Petition to Terminate Parental Rights and request to adopt.
- f. McPherson accepted judicial notice, on the record, of the previous CPS, previous court cases and pending filings.
- g. Had McPherson actually reviewed the cases, he would have noted that all three of Carly Asher Jones' children were removed in separate cases, based on various forms of NEGLECT and a well-documented history of drug abuse, physical violence, domestic violence and allegations of sex trafficking and prostitution along with the following facts: Ms. Jones parents, Kay and Tommy Asher had custody of her 1st child K.A.J. who was about 7 years old when Jones had a second child, K.G.A. when second child was less than 2 years old, he suffered a severely fractured skull of suspicious origin in Jones care. Jones parents were awarded and still maintain custody of 2nd child. Carly Asher Jones last orders regarding 1st and 2nd child limited visitation to supervised visits only. When 2nd child was 5 years old, Jones had 3rd child whose meconium after birth tested positive for methamphetamine, amphetamine, hydrocodone, hydromorphone, benzodiazepines and marijuana. 3rd child was removed and placed into foster care and at three months old was placed with Affiant's family. Affiant and her husband were awarded Permanent Managing Conservatorship of 3rd child when he was 6 months old. He is remained with Affiant's family and is now 4.5 years old and suffers difficulties in emotional regulation and learning delays due to the prenatal drug exposure. He had started self-harming when faced

with forced visitation with Ms. Jones, which Affiant herein is now admittedly withholding to protect the child - even at risk of being held in contempt of court.

- h. McPherson ignored Ms. Jones admission on the stand to continued crimes and criminal behavior (including purchasing and use of illegal drugs, violation of the Texas Compassionate Use Program, and faking a service animal)
- i. McPherson, in his judicial discretion, ignored the dangerous 20-year pattern of drug abuse including a 15 year addiction to methamphetamine and history of physical and domestic violence of Carly Asher Jones, including allegations made by her own daughter to Affiant of sex trafficking and prostitution.
- j. McPherson has not to my knowledge referred any of the crimes admitted by Carly Asher Jones to law enforcement.
- k. McPherson has been recused from our custody case, but has caused irreparable harm.

2. Office of the District Attorney, Danny Buck Davidson; Assistant District Attorney, Joey Fenlaw

- i. ADA Joey Fenlaw has an ethical and legal obligation to address any known crimes or corruption brought to his attention.
- ii. Mr. Fenlaw was directly informed of the actions of McPherson. 1) during an in-person meeting in his office in 2023, wherein he gave me print-outs of the ordered dismissals, 2) through email and 3) through phone calls.
- iii. Mr. Fenlaw was the recipient of several emailed requests for records in accordance with the Texas Public Information Act. Said requests were neither acted upon, responded to, nor referred to another county employee. We were simply stonewalled. Copies to be provided to investigators.
- iv. After two months of emails and calls, I sent an email to every elected official I could think of, pointing out that each person on the email had an oath of office to uphold and expressed my intent to pursue obtaining this information against all odds. Finally, I received a response. The Panola County DA's office retained City of Carthage Attorney, Collin Underwood to handle my requests. Certainly not treating me the same way they treat others requesting records. I've since obtained some of the records, but not all of it.

3. Former Deputy Sheriff Jeff Martin and his wife, former deputy and jail administrator Tina McMullan.

- a. Deputy Martin and his wife conspired to delay the transfer of individuals to state jail, thereby affecting their time served credit and incurring costs to the taxpayers of Panola County.
- b. Deputy Martin provided inmates with trips out of the facility, including an alleged overnight trip to a private citizen's house where they performed manual labor.
- c. Deputy Martin provided inmates with opportunities to come into physical contact with members of the public, friends and family members, while out on work detail.
- d. Deputy Martin failed to act on reports of drug sales in a school zone, where high school students were just driving across the street from the school parking lot to buy their drugs. I ultimately called the FBI to report this.
- e. Deputy Martin failed to act upon information and audio recording wherein Carly Asher Jones talks about the stolen gun she got rid of.

4. Individual Crimes of Carly Asher Jones – see; United States v. Dunnigan, [507 U.S. 87](#) (1993)...the commentary to §3C1.1 is explicit, that the phrase "impede or obstruct the administration of justice" includes perjury. Perjury is committed when a witness testifying under oath or affirmation gives false testimony concerning a material matter with the willful intent to provide false testimony.
- a. Perjury
 - b. Obstruction of Justice
 - c. Filing a False Report
 - d. Vexatious litigation to obstruct justice

MAXIMS OF LAW:

- 1) *Judex damnatur, cum nocens absoluitur*. The judge is condemned, when the guilty is acquitted.
- 2) *Judicis est judicare secundum allegata et probata*. It becomes a judge to decide according to things alleged and proved.

Judge McPherson took judicial notice of the previous CPS cases and court cases on the record. Therefore, he knew or should have known the extensive history of neglect, serious injury to a child, drug addiction and family violence involved. Due to McPherson's actions and/or inactions, abuse of official capacity, and deprivation of my Constitutionally guaranteed rights, under color of law, I have incurred damages and expenses. We have been denied our Constitutional Right to a fair and impartial judiciary and have been forced to either allow a child to be injured, or act in contempt of the Orders issued by McPherson that seriously endanger the emotional and physical health and welfare of a child. I have chosen to protect the child.

(END. REMAINDER OF PAGE INTENTIONALLY BLANK)

ADDITIONAL INFORMATION:

Once I shared information publicly about our experience, people began contacting me with their own horror stories of corruption in Panola County where their Constitutional rights have been ignored/violated by the judicial system of Panola County, Texas, there are many that will be exposed through investigation, but these are two examples:

- 1) Barbara King Schneider, whose two daughters were killed in a vehicular homicide from 8 years ago. The perpetrator was driving an 18-wheeler and allegedly using his phone at the same time. Despite the overwhelming evidence, after being charged with vehicular homicide – said perpetrator was released on bond – and hasn't been back to answer for what he did. The man never lost his CDL, the family of the dead sisters, have never had their day in court. Mrs. Schneider has begged for action, and when there was none, she became outspoken and the penalty has been the denial of justice for her family, in retaliation for her public criticism of the District Attorney's office.



- 2) Tristan Broaddus, who had charges "hanging over his head" that were ultimately not prosecuted for allegedly pulling a fire alarm at Carthage High School. In this case there are allegations of serious corruption that ultimately deprived Tristan, then a minor, from walking with his graduating class, and deprived him of scholarship opportunities while allowing the other accused party to go without any threat of prosecution and with freedom to utilize his sports scholarship. The

Broaddus family had the other party on audio recording admitting that he, not Tristan pulled the alarm. They fought as long as they could, before they ran out of money to fight with. Tristan Broaddus being scapegoated is alleged and believed to have been a show of favor to the "Courtney family" who the other student lived with. It is common knowledge in Panola County that the Courtney family has - for MANY years received special treatment from Panola County, and evidence thereof is apparent in the arrest, bond, case disposition and marriage records of Panola County. (Courtney dog fighting, Courtney Construction, and Danny Buck Davidson's daughter - is married to one of the Courtney brothers)

- 3) Failure to prosecute crimes: Several individuals have received preferential treatment, wherein their crimes were **not** treated as others, this too is apparent in the records of Panola County, a list of specific names will be provided to the investigators, but an example:

Clint Stephenson - four DWI's in Panola County - others outside of the county - ended up dying in a drunk driving ATV accident. A little accountability may have saved his life - they did their friend no favors by ignoring his problem and illegal behavior.

Jail Records

Skip to Main Content Logout My Account Search Menu New Jail Search Refine Search					
Record Count: 5					
Search By: Defendant Last Name: stephenson First Name: clint					
Booking Number	Defendant Name	Booked	Released	Arresting Agency	Charge(s)
11490	STEPHENSON, CLINT WORAN	07/26/2005	07/26/2005	Panola County Sheriff's Office	CRIMINAL
13-0082	STEPHENSON, CLINT WORAN	01/27/2013	01/27/2013	Department of Public Safety	DRIVING V
14-0911	STEPHENSON, CLINT WORAN	08/09/2014	08/10/2014	Carthage Police Department	DRIVING V
17-0626	STEPHENSON, CLINT WORAN	07/03/2017	07/03/2017	Carthage Police Department	DRIVING V
17-1129	STEPHENSON, CLINT WORAN	12/20/2017	12/20/2017	Carthage Police Department	UNL CARP
17-1129	STEPHENSON, CLINT WORAN	12/20/2017	12/20/2017	Carthage Police Department	DRIVING V

Bond Records

Bond Records Search Results						
Skip to Main Content Logout My Account Search Menu New Bond Search Refine Search						
Record Count: 4						
Search By: Defendant Last Name: stephenson First Name: clint Bond Status: All						
Bond Number	Defendant Name	Bond Type	Status/Date	Arrest Date	Bondsman	Charge(s)
1910	STEPHENSON, CLINT WORAN	750.00 Surety Bond	Posted 01/27/2013	01/26/2013	DADDY SAM'S BAIL BONDS	DRIVING WHILE
No Number	STEPHENSON, CLINT WORAN	1500.00 Surety Bond	Posted 08/10/2014	08/09/2014	DADDY SAM'S BAIL BONDS	DRIVING WHILE
2014-0672	STEPHENSON, CLINT WORAN	1500.00 Surety Bond	Received 09/24/2014		DADDY SAM'S BAIL BONDS	DRIVING WHILE
No Number	STEPHENSON, CLINT WORAN	1500.00 Surety Bond	Posted 12/20/2017	12/20/2017	OWENS BONDING COMPANY	DRIVING WHILE

RESULTING CRIMINAL CASES

Skip to Main Content Logout My Account Search Menu New Criminal Search Refine Search					
Record Count: 3					
Search By: Defendant Exact Name: on Party Search Mode: Name Last Name: stephenson First Name: clint All All Sort By: Filed Date					
Case Number	Citation Number	Defendant Info	Filed/Location	Type/Status	Charge(s)
17402		STEPHENSON, CLINT WORAN	07/26/2005 County Court at Law	Adult Misdemeanor Disposed	CRIMINAL MISCHIEF >=\$50-
28205-C		STEPHENSON, CLINT WORAN	11/18/2013 County Court at Law	Adult Misdemeanor Disposed	DRIVING WHILE INTOXICAT
28624-C		STEPHENSON, CLINT WORAN	08/21/2014 County Court at Law	Adult Misdemeanor Dismissed	DRIVING WHILE INTOXICAT

- 4) There is common knowledge of a "pay to play" system in Panola County called the "duck fund" or the "turkey fund" where people have paid for their charges to vanish or are quickly and quietly "disposed". I have personal knowledge of the

existence of this because my step-father utilized it. There are others who are willing to come forward **when an investigation is initiated by an outside agency**. They do not want to risk it otherwise, **because local retaliation is a real threat**.

- 5) The history of required recusals should be examined for the underlying facts and actions that caused the same, which is an expense to taxpayers and alleged to be the result of misconduct.
 - a) Bernie Tiede Case (murder of Margery Nugent)
 - b) Gregory Newson (murder of Deputy Chris Dickerson)
 - c) In Re: BBJ a child
- 6) Allegations of missing monies and/or other property or evidence from the Armory.
- 7) The case of Lauren Colvin Thompson.

(END – REMAINDER OF PAGE INTENTIONALLY BLANK)

RELIEF

I, Lisa Broomfield, am requesting a full investigation into the Panola County District Attorney's office and County Court at Law. I request that the Office of the Attorney General Criminal Division be contacted to conduct this investigation and initiate mitigating action, including withholding appointment of Joey Fenlaw as District Attorney of Panola County, pending full investigation. I request declaratory relief, disciplinary measures and criminal prosecution for unlawful acts.

Please take notice that failure to respond indicates tacit acquiescence, whereby you agree to all claims herein, and this affidavit shall stand as evidence against you in all courts of record, that you do, with full known malice and intent, support the unlawful abrogation of the Peoples' Constitutional rights, **a violation of your oath to the Constitutions of these United States, including the Texas Constitution, Article 16, Section 1.**

Please take notice that all responses not submitted under penalty of perjury are non-responses and shall consent to all claims herein.

I declare that to the best of my knowledge and belief, the information herein is true and correct.

Executed this 17th day of November, 2024.

/s/Lisa Broomfield

Lisa Broomfield

Troup, Texas 75789

Tel: [REDACTED]

VERIFICATION

My name is Lisa Broomfield, my [REDACTED], and my address is [REDACTED], Troup, Smith County, Texas, USA. I declare under penalty of perjury that the forgoing is true and correct. I have read this entire Affidavit/Complaint. The facts and circumstances contained in this petition are true to the best of my knowledge and belief. I have PERSONAL KNOWLEDGE of facts contained herein.

/s/ Lisa Broomfield
Lisa Broomfield, Affiant

State of Texas

County of Collin

This instrument was acknowledged before me by means of an interactive two-way audio and video communication on 11/18/2024 by Lisa LeAnn Broomfield.

