

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Robert Edward Davis, being duly sworn, hereby depose and state:

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 competently thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.

PURPOSE OF AFFIDAVIT

1. This affidavit is submitted in support of a Criminal Complaint against the individuals named herein, and other as yet unnamed court actors and individuals.
2. In support of each and every victim of the corrupt Tarrant County judiciary who has experienced similar abuses as outlined herein.

BACKGROUND OF AFFIANT

I am Robert Edward Davis, the Respondent in Cause No. 233-704630-21, a family law matter in the 233rd Judicial District Court of Tarrant County, Texas. As a pro se litigant, my pleadings are entitled to liberal construction under *Haines v. Kerner*, 404 U.S. 519 (1972), and related precedents, to achieve substantial justice over technical form. I have endured systemic violations of my constitutional rights, including due process under the Fourteenth Amendment and Texas Constitution Article I, §§ 13 and 19, through extrinsic fraud upon the court by Petitioner Felicia Marie Likiardopoulos Davis, judges, attorneys, the Tarrant County Domestic Relations Office (DRO), Office of the Attorney General (OAG) Child Support Division, District Clerk Thomas A. Wilder, District Attorney Phil Sorrells, and others. These violations constitute child abuse under Texas Family Code § 261.001, and by interfering with my father-child relationship without clear and convincing evidence, as required by *Troxel v. Granville*, 530 U.S. 57 (2000), violations of Texas Penal Code 25.03 have occurred.

STATEMENT OF PURPOSE

This Affidavit is submitted as evidence of crimes systematically committed by individuals within the Tarrant County Judiciary, DRO, OAG Child Support Division, and numerous other court actors since the inception of Cause No. 233-704630-21. There is no immunity from any action taken by a judicial officer or court actor in the absence of jurisdiction. These actions have been taken by multiple individuals and entities, in concert, and were done knowingly and willingly for the sole purpose of harassing, damaging, and incapacitating me. All who receive this Affidavit/Complaint have taken an oath under Texas Constitution Article XVI, § 1, requiring action upon evidence of corruption or unlawful conduct. This Affidavit/Complaint serves that purpose.

NOTE: THIS IS NOT THE FIRST AFFIDAVIT SUBMITTED TO MANY OF THE COURT ACTORS LISTED. PREVIOUS AFFIDAVITS HAVE BEEN SUBMITTED TO THE COURT ON MULTIPLE OCCASIONS AND HAVE NOT BEEN ADDRESSED BY ANY JUDGE, OAG EMPLOYEE/ATTORNEY, OR OTHER WHO HAS A SWORN DUTY TO ACT, OPENLY VIOLATING THE OATH OF OFFICE, WHICH IS GROUNDS FOR REMOVAL IN AND OF ITSELF.

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 I, 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.

TIMELINE OF EVENTS AND VIOLATIONS

1. On August 13, 2021, Felicia Marie Likiardopoulos Davis filed the Original Petition for Divorce, initiating Cause No. 233-704630-21. This filing contained unsworn allegations without supporting affidavits, setting the stage for procedural due process violations under the Fourteenth Amendment and Texas Constitution Article I, §§ 13 and 19. Associate Judge Kate Stone and Judge Kenneth Newell failed to scrutinize the lack of sworn proof, breaching their oaths and committing abuse of official capacity under Texas Penal Code § 39.02.
2. On August 18, 2021, an ex parte Temporary Restraining Order (TRO) was issued by Judge Newell without a verified petition or affidavit attesting to immediate irreparable harm, violating Texas Rule of Civil Procedure 680 and due process. This TRO interfered with my parental rights without clear and convincing evidence, constituting child abuse under Texas Family Code § 261.001(4)(A) by causing emotional harm to the children through unwarranted separation from their father. Felicia Davis requested this interference without evidence, perpetrating extrinsic fraud upon the court, voiding the order ab initio per *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944), and *In re Russell*, 321 S.W.3d 846 (Tex. App.—Fort Worth 2010). Stone and Newell failed to report this fraud, violating Texas Code of Judicial Conduct Canon 3D and Texas Disciplinary Rules of Professional Conduct Rule 3.03.
3. From August 2021 through July 2023, multiple hearings occurred without proper service on me, including the June 28, 2022 hearing before Stone, where substitute

service was improperly authorized without an affidavit under Texas Rule of Civil Procedure 106(b), rendering proceedings void per *Wilson v. Dunn*, 800 S.W.2d 833 (Tex. 1990), and *Peralta v. Heights Med. Ctr., Inc.*, 485 U.S. 80 (1988). DRO staff (Craig S. Michalk, Anne A. Smith) and OAG representatives (Lori Varnell, Mark Lane, Riley Reynolds) requested and obtained orders based on unsworn claims, committing tampering with governmental records under Texas Penal Code § 37.10. These actions denied me due process, ethically breaching Canon 3D and Rule 3.03, criminally violating 18 U.S.C. § 242 (deprivation under color of law), and constituting official oppression under Texas Penal Code § 39.03.

4. On July 24-25, 2023, the final trial occurred, resulting in a Final Decree of Divorce that awarded Felicia Davis primary conservatorship without clear and convincing evidence of my unfitness, violating *Troxel*. This decree was tainted by prior fraud, void ab initio. Newell ignored my pro se status and liberal construction rights under *Haines*, committing further due process violations. Presiding Judge David Evans failed to recuse Newell despite evident bias, complicit in oath violations.

5. From August 2023 through October 2024, multiple enforcement motions were filed by DRO/OAG without verifying my indigence, leading to Show Cause hearings that ignored my affirmative defense of inability to pay under Texas Family Code § 157.008(c). These violated *Bearden v. Georgia*, 461 U.S. 660 (1983), equating incarceration for indigent non-payment to imprisonment for debt under Texas Constitution Article I, § 18. Sorrells failed to investigate these abuses despite complaints.

6. On November 17, 2025, I was incarcerated for three days on a void capias from an August 14, 2025 hearing held without jurisdiction due to unresolved recusals under Texas Rule of Civil Procedure 18a(f). This false imprisonment violated due process, with unclean hands barring Felicia Davis and actors from benefiting. Fruit of the poisonous tree excludes all evidence from these proceedings.

7. On December 17, 2025, at a staged enforcement hearing before Newell, I was sentenced to 120 days for contempt without indigency inquiry or appointed counsel, despite my recognized indigence. This violated *Turner v. Rogers*, 564 U.S. 431 (2011), and *Bearden*. The hearing ignored pending recusals, constituting extrinsic fraud voiding ab initio. Actors including Newell, Stone, Michalk, Smith, Varnell, Lane, and Reynolds conspired, committing abuse of official capacity (§ 39.02), official oppression (§ 39.03), and tampering (§ 37.10). Further enforcement would commit additional crimes, with punishments up to one year imprisonment and \$4,000 fine. Their failure to report breaches Canon 3D and Rule 3.03, impelling disbarment/removal.

8. From December 17, 2025, to January 21, 2026, I endured unlawful incarceration, causing irreparable harm to my reputation, community standing, and physical/mental health. Jail staff refused to process my habeas corpus, denying access to courts. District Clerk Wilder restricted my eFile/ResearchTx access for months, denying due process after five requests—a tactic favoring judges. Sorrells failed to contact me despite complaints, violating his oath and requiring referral to Texas OAG Public Corruption Unit.

9. On January 23, 2026, Felicia Davis filed a frivolous motion to modify and obtained an ex parte TRO signed by Stone without affidavit or evidence of harm, violating TRCP 680 and *InterFirst Bank San Felipe, N.A. v. Paz Constr. Co.*, 715 S.W.2d 640 (Tex. 1986). This law-fare interfered with my parental rights without clear evidence, child abuse under § 261.001. It shows conspiracy with court actors, void ab initio for fraud. No service occurred by January 29, 2026, voiding jurisdiction per Peralta and Wilson. Proceeding compounds crimes under §§ 39.02, 39.03, 37.10.

10. Ongoing: Second Court of Appeals complicit for ignoring crimes; Evans complicit for not recusing Newell/Stone or referring; Supreme Court of Texas conflicts (Justices Blacklock/Busby bias against affiant Dr. McKenzie; Lehrmann's Tarrant ties). Wilder and Sorrells failed duties, perpetuating RICO-level fraud.

CRIMINAL IMPLICATIONS OF FAILING TO ADDRESS DUE PROCESS VIOLATIONS

Failure to address enumerated due process violations (defective service, no indigency findings, ignored recusals, ex parte orders without affidavits) constitutes official oppression (§ 39.03, Class A misdemeanor, up to 1 year/\$4,000) and abuse of capacity (§ 39.02). Ethically, it breaches Canon 3D (report misconduct) and Rule 3.03 (candor), impelling disbarment/removal. Civilly, actors face liability under 42 U.S.C. § 1983. Criminally, under 18 U.S.C. § 242, deprivation under color of law warrants up to life imprisonment if harm results. Recent incarcerations, especially amid indigence, exemplify this—Newell/Stone imposed punitive contempt without willfulness finding, voiding orders.

FRAUD UPON THE COURT AND EXTRINSIC FRAUD

Extrinsic fraud by Felicia Davis (unsworn filings, frivolous motions) and actors (void orders, ignored indigency/recusals) voids all proceedings ab initio. Unclean hands bars relief; fruit of the poisonous tree excludes tainted evidence. No party benefits from fraud.

CRIMES ALREADY OCCURRED AND DEMAND FOR REFERRAL

Actors committed: abuse of capacity (§ 39.02), official oppression (§ 39.03), tampering (§ 37.10), child abuse (§ 261.001). Demand immediate referral of Newell, Stone, Evans, Sorrells, Wilder, Michalk, Smith, Varnell, Lane, Reynolds, Felicia Davis to Tarrant DA (despite Sorrells' failures), Texas OAG Public Corruption Unit, Texas Rangers, FBI, SCJC, Texas State Bar, TCOLE. Request arrest warrants if jurisdiction allows. Sorrells' inaction violates oath, requiring his referral.

CONSTITUTIONAL VIOLATIONS AND IMPLICATIONS

Violations deny notice, hearing, neutral adjudication, ethically breaching Canon 3D/Rule 3.03 (disbarment/removal), criminally under §§ 39.02/39.03/37.10 (imprisonment/fines), civilly under § 1983 (damages). Further action commits same crimes. Actors must be removed/recused.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 2, 2026.

/s/ Robert Edward Davis
Robert Edward Davis

CERTIFICATE OF SERVICE

I certify that a true copy was served on all parties pursuant to Texas Rule of Civil Procedure 21a by electronic service and/or certified mail on February 2, 2026.

/s/ Robert Edward Davis
Robert Edward Davis

VERIFICATION - UNSWORN DECLARATION JURAT

My name is Lewis Brooks McKenzie, my [REDACTED], I am over 18 years of age, of sound mind and body, and my address is [REDACTED] North Rich-land Hills Texas 76180, Tarrant County, USA. I declare under penalty of perjury that the facts in the forgoing are within my personal knowledge and are true and correct. I am the Relator/Affiant in this matter and all of the documents included in this filing are true and correct copies.

/s/ Robert Edward Davis
Robert Edward Davis

[REDACTED] North Rich-land Hills
Texas 76180,