

UNSWORN AFFIDAVIT OF CHARLES J. JAYROE

(Submitted Pursuant to 28 U.S.C. § 1746)

My name is **Charles J. Jayroe**, and I am over the age of eighteen and competent to make this declaration. I declare the following based on my personal knowledge and the timeline previously provided to the Office of the Attorney General and multiple law-enforcement agencies.

1. On **April 7, 2025**, I personally delivered a criminal complaint package at approximately **9:15 a.m.** to Bailiff Rollins at the Collin County Courthouse for filing with the presiding Judge Roach. (See timeline entry dated 4-7-25 @ 9:15 a.m.)
2. At **9:29 a.m.** the same morning, I attempted to hand-deliver a copy of that same complaint to the **Collin County District Attorney's Office**. The receptionist, **Daniella Bernal**, initially received it, but **Evelyn Rutherford**, Administrative Manager, refused acceptance on behalf of the DA. Two witnesses were present. One being Patrick Tuter.
3. I immediately proceeded to the **Collin County Sheriff's Office** seeking acceptance by a deputy, but that office also refused to take the complaint. The deputy instructed me to "call the Texas Rangers."
4. From **April 7, 2025 through October 22, 2025**, no one from the **Collin County District Attorney's Office** has ever contacted me regarding that filing or any subsequent complaints, despite repeated written and verbal follow-ups and public notice of the same in federal court records.
5. Since that date, my case has deteriorated drastically:
 - a. My son was **kidnapped under color of law** on **September 24, 2025**, based on forged "Proposed Temporary Orders."
 - b. I was **falsely arrested** the same day on a fabricated probable-cause affidavit.
 - c. Evidence later proved those documents void and fraudulent, all previously under OAG review.
 - d. The presiding judge publicly **acknowledged the child-abuse confession had been admitted** yet refused to review it, constituting suppression of material evidence and fraud upon the court.

6. To date, neither the Collin County District Attorney nor any agency notified of these crimes has initiated contact, interview, or investigation regarding the April 7, 2025 complaint packet.

I therefore affirm that the Collin County DA has had my original affidavit and supporting evidence **for more than six months without action**, constituting refusal and neglect under the standards requested for submission to the OAG.

Executed in **Lewisville, Texas**, this **22 day of October 2025**.

/s/ Charles J. Jayroe

[REDACTED]

Lewisville, TX 75056

[REDACTED] [REDACTED]

“I declare under penalty of perjury that the foregoing is true and correct.”

**SUPPLEMENTAL AFFIDAVIT AND NOTICE OF CONTINUING
CRIMINAL CONDUCT**

Submitted to:

**Office of the Attorney General of Texas – Criminal Investigations Division
c/o Special Investigator**

From:

Charles J. Jayroe

[REDACTED]

Lewisville, Texas 75056

[REDACTED] | [REDACTED]

Date: October 22, 2025

I. PURPOSE OF THIS SUPPLEMENTAL

This affidavit supplements my original sworn complaint dated **April 4, 2025**, already accepted by the OAG and the COLLIN County District Attorney’s Office, concerning felony misconduct by officers of the court and public officials in **Cause No. 219-55128-2013** (*In the Interest of J.H.J.*).

Since that filing, substantial new criminal events have occurred — including **the abduction of my minor child under color of law on September 24, 2025**, and **my own false arrest and imprisonment** based on fabricated probable-cause statements and forged judicial orders.

This supplemental submission documents those new offenses and the OAG’s existing awareness of the underlying fraud, confirming that the prior case was already under investigation for **void and fraudulent court orders**.

II. NEW EVENTS SINCE APRIL 4, 2025

1. **Kidnapping of Minor Child (9/24/25)**

On September 24, 2025, my son was seized from school under a “Proposed Temporary Order” that was never signed, never file-stamped, and already void by law. I had previously warned the school, the district, and law enforcement in writing that these documents were fraudulent and that any action taken upon them would constitute **unlawful abduction under color of law**. Despite those warnings, the order was circulated by opposing counsel **Robert James McEwan (KoonsFuller, P.C.)**, resulting in my son’s forced removal.

2. **False Arrest and Imprisonment (9/24–25/25)**

On the same day, McEwan transmitted a falsified “Probable Cause Affidavit” to Lewisville PD containing knowingly false statements of fact. That affidavit led to my arrest on a baseless felony charge. My **268-page evidence packet** now proves those statements were demonstrably false, satisfying the elements of **Tex. Penal Code §§ 37.02, 37.09, and 37.10** (Perjury, Tampering, and Fraudulent Use of Government Record).

3. **Judicial Suppression of Admitted Evidence (12/13/24 Hearing)**

In the record of **December 13, 2024**, Judge **Jennifer Edgeworth** explicitly acknowledged that the **audio confession of the child’s mother** — previously filed and marked as **admitted on August 29, 2025** — was part of the record. Yet she refused to play, examine, or consider it before issuing final orders contrary to the evidence.

This act constitutes **fraud upon the court, misprision of felony (18 U.S.C. § 4)**, and **official oppression (Tex. Penal Code § 39.03)** by suppressing material exculpatory evidence.

4. **Failure to Enforce on Clear Contempt**

The same judge declined to hold McEwan in contempt for violating his own

subpoena restriction in the Final Orders (pgs. 9-11, Exhibit A), further proving **unequal enforcement and obstruction of justice.**

III. STATUS WITH LOCAL AUTHORITIES

The **OAG, Denton County DA, and Texas Rangers (Company B)** all received verified notice of the fraudulent orders before these acts occurred. None acted to prevent or investigate the resulting kidnapping and false arrest.

This failure to intervene after notice constitutes **dereliction of duty** under **Tex. Penal Code § 39.02**, and exposes all agencies to potential **Monell liability** under **42 U.S.C. § 1983** for systemic deprivation of rights.

IV. REQUEST FOR ACTION

I hereby:

- Re-affirm my prior sworn statements dated April 4, 2025;
 - Supplement them with this affidavit and attached exhibits; and
 - Request immediate investigation and referral for prosecution of:
 - **Robert J. McEwan, Amy Munger, Judge Jennifer Edgeworth**, and others for perjury, obstruction, conspiracy, and child abduction under color of law.
-

V. ATTACHED EXHIBITS

1. **Exhibit A** – Original April 4, 2025 Criminal Complaint Packet
2. **Exhibit B** – “McEwan False Probable Cause vs Truth” (268-page master evidence file)

3. **Exhibit C** – Transcript of Hearing 12.13.2024 (showing confession acknowledgment and suppression)
 4. **Exhibit D** – Copy of Admitted Confession Transcript (Exhibit Z-1)
 5. **Exhibit E** – “Temporary Orders Not Filed by Clerk” (9.18.25) showing forged document circulation
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VI. DECLARATION

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed this **22nd day of October 2025**, in **Denton County, Texas**.

/s/ Charles J. Jayroe

Notary or Unsworn Declaration per 28 U.S.C. § 1746

CRIMINAL COMPLAINT AND NOTICE OF FELONY MISCONDUCT

*RE: Criminal Complaint – Judicial and Attorney Misconduct, Conspiracy, Child
Endangerment, and Fraud*

Reference Case:

*Cause No. 219-55128-2013 – In the Interest of J.H.J., a Child
219th Judicial District Court, Collin County, Texas*

FILED BY:

Charles J. Jayroe

[REDACTED]
Lewisville, TX 75056

[REDACTED]

DATE: April 4, 2025

SUBMITTED TO:

**Collin County District Attorney's
Office**

Collin County Courthouse

[REDACTED]
McKinney, TX 75071

Attention: Special Prosecutor Request

CRIMINAL COMPLAINT AND NOTICE OF FELONY MISCONDUCT

*RE: Criminal Complaint – Judicial and Attorney Misconduct, Conspiracy, Child
Endangerment, and Fraud*

Reference Case:

*Cause No. 219-55128-2013 – In the Interest of J.H.J., a Child
219th Judicial District Court, Collin County, Texas*

FILED BY:

Charles J. Jayroe

[REDACTED]
Lewisville, TX 75056

[REDACTED]

DATE: April 4, 2025

SUBMITTED TO:

**Collin County District Attorney's
Office**

Collin County Courthouse

[REDACTED]
McKinney, TX 75071

Attention: Special Prosecutor Request

NATURE OF FILING:

This document constitutes a formal **Criminal Complaint and Request for Special Prosecutor** for investigation and prosecution of criminal conduct directly arising from and surrounding the above-referenced family court case.

This filing includes allegations of:

- **Felony Perjury**
- **Conspiracy to Obstruct Justice**
- **Abuse of Official Capacity and Process**
- **Official Oppression**
- **Fraud Upon the Court**
- **Misprision of Felony**
- **Violation of Mandatory Reporting Laws**
- **Retaliation Against a Whistleblower Parent**
- **Judicial Misconduct and Negligence**
- **Malicious Prosecution and Child Endangerment**

A full narrative and legal analysis are included in the attached complaint document. Supporting documentation and exhibits will be made available to assigned law enforcement or investigative officials upon request.

Filed By:

/s/ Charles J. Jayroe

April 4, 2025

SUMMARY OF CRIMINAL COMPLAINT

Pursuant to Texas and federal criminal law, I, **Charles J. Jayroe**, a private citizen and whistleblower, respectfully submit this formal **Criminal Complaint and Request for Special Prosecutor** for investigation and prosecution of criminal conduct directly arising from and surrounding Family Law Cause No. 219-55128-2013 – *In the Interest of J.H.J., a Child*.

This complaint outlines ongoing and coordinated misconduct, including but not limited to: felony perjury, conspiracy to obstruct justice, child endangerment, abuse of process, malicious prosecution, retaliation against a whistleblower, suppression of evidence, dereliction of official duties, and aiding and abetting known violations by licensed legal professionals and judges.

I have reserved all evidentiary exhibits for presentation to law enforcement and designated oversight bodies, including the Texas Rangers, FBI, DOJ, and the Chief Disciplinary Counsel of the State Bar of Texas.

LIST OF NAMED DEFENDANTS & CONTACT INFORMATION

1. Hon. Jennifer Edgeworth

Judge, 219th District Court
Collin County Courthouse
[REDACTED], McKinney, TX 75071

2. Hon. Ray Wheless

Regional Presiding Judge, 1st Administrative Judicial Region
Collin County Courthouse
[REDACTED], McKinney, TX 75071

3. Robert James McEwan

Attorney at Law – KoonsFuller, P.C.
[REDACTED], Suite 450
Southlake, TX 76092
[REDACTED]

4. Kendra Camille Crain

Party to Case No. 219-55128- [REDACTED]
[REDACTED]

Plano, TX 75093
[REDACTED]

5. Dr. Emily Van Pelt

Licensed Mental Health Professional

[REDACTED], Suite 682

Dallas, TX 75225
[REDACTED]

6. Jacqueline Crain Powers (aka Jaki Crain)

[REDACTED]
Denison, TX 75020
[REDACTED]

7. KoonsFuller, P.C.

Law Firm Representing Ms. Crain

[REDACTED] #2200

Plano, TX 75093

Main Line: [REDACTED]

8. State Bar of Texas – Office of Chief Disciplinary Counsel

1414 Colorado St

Austin, TX 78701
[REDACTED]
[REDACTED]

9. State Commission on Judicial Conduct (SCJC)

P.O. Box 12265

Austin, TX 78711
[REDACTED]
[REDACTED]

Filed By:

Charles J. Jayroe

April 4, 2025

SUMMARY OF CRIMINAL COMPLAINT

Pursuant to Texas and federal criminal law, I, **Charles J. Jayroe**, a private citizen and whistleblower, respectfully submit this formal **Criminal Complaint** against the following parties:

1. **Judge Jennifer Edgeworth**
2. **Judge Ray Wheless, Regional Presiding Judge**
3. **Robert James McEwan, Attorney at Law**
4. **Kendra Camille Crain**
5. **Dr. Emily Van Pelt**
6. **Jacqueline Crain Powers**
7. **KoonsFuller, P.C.** (law firm representing Ms. Crain and employer of Mr. McEwan)
8. **State Bar of Texas – Office of Chief Disciplinary Counsel**
9. **State Commission on Judicial Conduct (SCJC)**

This complaint outlines ongoing and coordinated misconduct, including but not limited to: felony perjury, conspiracy to obstruct justice, child endangerment, abuse of process, malicious prosecution, retaliation against a whistleblower, suppression of evidence, dereliction of official duties, and aiding and abetting known violations by licensed legal professionals and judges.

The facts supporting this complaint arise from Family Law Cause No. 219-55128-2013, currently before the 219th District Court of Collin County, Texas.

I have reserved all evidentiary exhibits for presentation to law enforcement and designated oversight bodies, including the Texas Rangers, FBI, DOJ, and the Chief Disciplinary Counsel of the State Bar of Texas.

CRIMINAL ACTS AND VIOLATIONS (Summary)

A. Robert James McEwan / KoonsFuller, P.C.

- Knowingly submitted and relied upon false testimony and fraudulent affidavits in violation of **Tex. Penal Code § 37.02 (Perjury)**;
- Committed abuse of process under **Tex. Civ. Prac. & Rem. Code § 10.001**, misusing legal procedures for improper purposes;
- Engaged in malicious prosecution by advancing baseless legal actions with retaliatory intent, violating clearly established rights (*Richey v. Brookshire Grocery Co.*, 952 S.W.2d 515, 517 [Tex. 1997]);
- Interfered with mental health professionals, manipulating therapy outcomes and breaching confidentiality to control litigation outcomes;
- Acted in coordination with others to defraud the court, violating **18 U.S.C. § 371 (Conspiracy to Defraud the United States)** and **Tex. Penal Code § 15.02 (Criminal Conspiracy)**;
- KoonsFuller, P.C. knowingly failed to discipline or respond to these violations despite notice, thereby enabling the misconduct.

B. Judge Jennifer Edgeworth

- Ignored statutory stay under **Tex. R. Civ. P. 18a(f)** triggered by Plaintiff's Verified Motions to Recuse;
- Suppressed material evidence of child abuse despite admissible audio confessions;
- Repeatedly refused to investigate or report known felony conduct, constituting **Misprision of Felony** under **18 U.S. Code § 4**;
- Her failure to act on known misconduct and abuse violates **Tex. Penal Code § 39.03 (Official Oppression)** and **§ 39.02 (Abuse of Official Capacity)**;
- Her continued rulings under conditions of disqualification and known jurisdictional conflict further constitute **Obstruction of Justice** under **18 U.S.C. § 1503**, and pattern of **Fraud Upon the Court**;

- During a private in-chambers interview with the child, Judge Edgeworth was informed directly by the minor of physical abuse inflicted by the mother. Despite this firsthand disclosure, she failed to report the abuse to CPS or any agency, in violation of **Tex. Fam. Code § 261.101 (Mandatory Reporting)** applicable to judges;
- In open court, Judge Edgeworth later claimed that she was “not there the day of the assault,” and therefore could not confirm what happened—effectively discrediting the child’s account and supporting findings that ignored the abuse;
- When directly questioned by Plaintiff, she denied calling anyone a liar, despite having entered findings that by implication rejected the child’s testimony of abuse.

The persistent and unlawful conduct by Judge Jennifer Edgeworth—including suppression of admissible evidence of child abuse, refusal to comply with mandatory reporting laws, and repeated rulings in direct contradiction to law and evidence—strongly suggests that her actions were not merely negligent, but motivated by external influence.

The only plausible explanation for such sustained judicial misconduct in the face of overwhelming proof of abuse is that Judge Edgeworth has been improperly influenced—most likely through financial contributions or favors from individuals connected to this case. It is reasonable to infer that Jacqueline Crain Powers, or another associate connected to Kendra Crain or the law firm KoonsFuller, may have made undisclosed campaign contributions or financial incentives to Judge Edgeworth in exchange for favorable rulings. This would constitute a serious violation of both state and federal anti-corruption laws and calls for immediate investigation.

No ethical or law-abiding judge would willingly suppress a child’s outcry of abuse—especially after personally interviewing the child, hearing a confession of physical assault from the abuser, and receiving corroborating evidence—unless compelled by a corrupt interest to do so. The pattern here is not one of error or oversight; it is one of deliberate protection of abusers, obstruction of justice, and abuse of judicial office for unlawful purposes.

C. Judge Ray Wheless, Regional Presiding Judge

- Failed to timely and impartially assign motions to recuse Judge Edgeworth, despite repeated filings and required referrals under **Tex. R. Civ. P. 18a(g)(1)**;
- Delayed appointment of neutral judges or improperly supported Judge Edgeworth's continued rulings during disqualification periods, thereby violating the procedural protections afforded under Texas law;
- His failure to act allowed improper jurisdictional rulings, amounting to **derelection of duty** and obstruction of judicial fairness (*In re Union Pac. Res. Co.*, 969 S.W.2d 427, 428 [Tex. 1998]).

D. Kendra Camille Crain

- Committed felony perjury under **Tex. Penal Code § 37.02**, repeatedly providing false statements under oath;
- Assaulted a minor child on May 12, 2023, then falsely denied the incident, despite recorded confession;
- Participated in litigation abuse in conjunction with McEwan and KoonsFuller, undermining the safety and welfare of the minor.

E. Dr. Emily Van Pelt

- Failed to report known abuse in violation of **Tex. Fam. Code § 261.101 (Mandatory Reporting)**;
- Gave materially false statements under oath concerning the mental health of the child without full disclosure of abuse history;
- Breached professional and legal standards governed by the **Texas Behavioral Health Executive Council**, enabling further harm.

F. Jaki Crain

- Financed litigation involving known fraud and perjury to prevent custody reform and enable further abuse;
- Participated in an ongoing **civil conspiracy** under **Tex. Civ. Prac. & Rem. Code § 71.002**, providing resources and influence to facilitate wrongful litigation outcomes (*Triplex Commc 'ns, Inc. v. Riley*, 900 S.W.2d 716 [Tex. 1995]).

G. State Bar of Texas – Office of Chief Disciplinary Counsel

- Refused to investigate or act upon verified, documented misconduct by licensed attorney Robert McEwan, despite multiple submissions of evidence and criminal allegations;
- Dismissed complaints with form-letter responses, failing to perform independent inquiry or follow disciplinary guidelines under **Tex. Gov't Code § 81.072**;
- Enabled continued misconduct through **deliberate inaction**, constituting a failure of oversight and complicity with ongoing violations.

H. State Commission on Judicial Conduct (SCJC)

- Failed to investigate verified complaints and audio evidence confirming judicial misconduct, abuse of discretion, and suppression of evidence by Judge Edgeworth;
 - Issued blanket dismissals without explanation, thereby obstructing public accountability in violation of **Tex. Const. Art. V, § 1-a**;
 - Actively denied due process to a whistleblower parent by permitting unchecked judicial bias and retaliation.
-

RELIEF REQUESTED

I hereby request that a **special prosecutor** be appointed to investigate the coordinated criminal actions described herein. This case represents not just private injustice, but a systemic failure of legal ethics, child protection, and judicial accountability.

I am available to provide full documentation and testimony to any designated law enforcement or prosecutorial authority.

The public has a right to know, and no parent should be retaliated against for exposing abuse.

Respectfully submitted,

/s/ Charles J. Jayroe

April 4, 2025

**STATE OF TEXAS §
COUNTY OF DENTON§**

BEFORE ME, the undersigned authority, on this day personally appeared **Charles J. Jayroe**, known to me or proved to me through satisfactory evidence to be the person whose name is subscribed to the foregoing instrument titled “**Criminal Complaint and Notice of Felony Misconduct**”, and who, after being by me duly sworn, stated upon oath that the statements and allegations contained therein are true and correct to the best of his knowledge, information, and belief.

SUBSCRIBED AND SWORN TO BEFORE ME, on this 4TH day of April, 2025, by **Charles J. Jayroe**.

Notary Public, State of Texas

[Seal]

My Commission Expires: _____

**MCEWAN FALSE PROBABLE-CAUSE AFFIDAVIT VS. THE OFFICIAL
RECORD – FEDERAL REFERRAL MEMORANDUM ON EVIDENCE
TAMPERING AND CIVIL-RIGHTS VIOLATIONS**

Point 1 – False Statement Regarding “Capias for Failure to Appear”

The *Probable-Cause Affidavit for Interference* misrepresents that “a capias was issued for failure to appear” (see *LPD Affidavit*, Exhibit A).

Factual Background

- The referenced *Order for Capias* (April 17 2025) was issued on a **Second Amended Motion to Revoke Suspended Commitment**, not for non-appearance or contempt. It appears as *Order for Capias* dated 4/17/25 (Exhibit B).
- That order was **never e-filed contemporaneously** in the Collin County system. The only electronic record is a “**Second Order for Capias and Recall of Warrant Issued April 17 2025**,” submitted months later on **September 22 2025** (Exhibit C). This shows the original document had not been executed or was being retroactively recreated.
- The *Writ of Attachment* dated **September 24 2025** (Exhibit D) likewise relies on the same void orders from Cause No. 219-55128-2013, even though jurisdiction had already shifted following the Bill of Review accepted September 3 2025.
- At the time these post-September filings were made, **Judge Edgeworth was under a pending recusal**; her recusal was not ruled upon until **April 29 2025** (Exhibit E – Order Denying Father’s Sixth and Seventh Motions to Recuse, Judge Ray Wheless). Any “continuing” actions she took while recusal was pending were therefore procedurally improper.

Legal and Evidentiary Defects

1. **Misrepresentation of Offense Basis** – The affidavit states the capias arose from a “failure to appear,” yet the underlying order shows the alleged violation was of supervision terms, not non-appearance. This is a material falsehood.
2. **Jurisdictional Voidness** – By September 2025, plenary power had lapsed under **Tex. R. Civ. P. 329b(f)**; thus, any reissued capias or writ was **void ab initio**.
3. **Retroactive Filing Pattern** – The September 22 2025 “second” order (Exhibit C) proves a deliberate attempt to backdate enforcement authority and mislead law enforcement.

4. **Reliance on Counsel’s Assertions, Not Court Record** – LPD and affiant officers accepted information from attorney **Robert J. McEwan** as fact without verifying its authenticity through the clerk or docket, producing a **false-probable-cause narrative**.

Conclusion

The assertion that a valid April 17 2025 capias existed for “failure to appear” is demonstrably false. The documents relied upon were (i) never properly filed, (ii) later re-submitted after jurisdiction ended, and (iii) created while the presiding judge was under an unresolved recusal. These defects collectively destroy probable cause and support claims for **false arrest, evidence tampering, and deprivation of rights under color of law**.

Point 2 – False Claim of Valid Court Orders and Hearing on June 20, 2025

The *Probable-Cause Affidavit for Interference* states that “court documents show” a June 20, 2025 hearing was held resulting in enforceable temporary orders (see *LPD Affidavit*, Exhibit A). This assertion is **factually and procedurally false**.

Factual Background

- The **Notice of Court Proceeding on June 20, 2025** (Exhibit F) merely set a date for hearing but **no record, transcript, or signed order** exists confirming that such a hearing was ever held. The official court reporter, **Tonya Lebo**, has repeatedly refused to release any transcript, further confirming that **no hearing record was created**.
- The “Temporary Orders in Suit to Modify Parent-Child Relationship,” later **e-filed on July 16, 2025** (Exhibit G), were **unsigned** and **never presented in open court**. These were *proposed orders*, not judicial rulings.
- Plaintiff’s **Motion to Strike Unsigned Temporary Orders** (filed July 9, 2025, Exhibit H) and **Motion to Vacate Void Temporary Orders** (filed July 14, 2025, Exhibit I) were both timely objections identifying that no valid temporary orders had ever been entered.
- The court file shows no signed order on or after June 20, 2025, consistent with the fact that the presiding judge, **Jennifer Edgeworth**, remained under an unresolved **recusal proceeding** until April 29–30, 2025 (Exhibit E).

- Despite these defects, attorney **Robert J. McEwan** repeatedly represented to law enforcement and other courts that valid “temporary orders” existed from a June 20 hearing. These statements directly contradicted the **Collin County eFile docket** and the content of the “proposed” documents themselves.
-

Legal and Evidentiary Defects

1. **Fabricated Judicial Record** – The affidavit’s reference to “court documents” implying valid orders is based on *unsigned proposals* never entered by a judge. No transcript or certified order exists to support the claim.
 2. **Perjury by Omission** – McEwan omitted that both the *Motion to Strike* and *Motion to Vacate* were filed before the alleged “orders” were circulated, proving he knew their legal invalidity.
 3. **Violation of TRCP 329b(f) and Collin County Local Rule 3.02** – Even if such orders had been signed (they were not), plenary power had already expired and jurisdiction was superseded by the pending Bill of Review.
 4. **Use of Void Documents as Law-Enforcement Evidence** – McEwan transmitted these “proposed” orders to the Lewisville Police Department and represented them as enforceable to justify an arrest and child seizure, constituting **use of forged or fraudulent governmental records** under Tex. Penal Code § 37.10 and **deprivation of rights under color of law** (18 U.S.C. § 242).
-

Conclusion

No valid hearing occurred on June 20, 2025, and no enforceable temporary orders were ever signed. McEwan’s false representations converted *proposed drafts* into fabricated judicial orders, later weaponized to produce a false probable cause narrative and an unlawful arrest. These acts meet the elements of **tampering with a governmental record, obstruction of justice, and fraud under color of law**, all subject to federal jurisdiction under **18 U.S.C. §§ 241, 242, and 1519**.

Point 3 – False Allegations of Avoidance, Defiance, and Coaching; Improper Use of Void Writ and Contempt Record

The *Probable-Cause Affidavit for Interference* asserts that (1) Mr. Jayroe intentionally avoided personal service, (2) evaded court hearings and visitation orders, and (3) coached his child to resist visitation—all based on documents **supplied by attorney Robert J. McEwan** (see *LPD Affidavit*, Exhibit A).

Each claim is demonstrably false and contradicts the official court docket and authenticated evidence.

Factual Background

- On **July 18 2025**, McEwan delivered materials to law enforcement purporting to be “orders from the court,” though each was drawn from the same **unsigned, proposed temporary orders** later e-filed July 16 2025 (Exhibit G – Temporary Orders; Exhibit I – Motion to Vacate Void Orders).
- The **Collin County eFile docket** (Exhibit J) confirms that no valid service was recorded for these July filings; the affidavit’s statement that Jayroe “intentionally avoided service” is **disproven by the docket record itself**.
- The “avoidance of court” allegation ignores that Jayroe filed multiple timely pleadings—**Motion to Strike Unsigned Temporary Orders (7.9.25)** and **Motion to Vacate Void Temporary Orders (7.14.25)**—which the court declined to hear. Far from avoiding court, he **affirmatively sought rulings and was ignored**.
- McEwan himself was in **direct contempt of a standing order** prohibiting ex parte subpoenas of the child’s counselor, Tina Dominy LPC, as proven in the *Summary of Unequal Enforcement in the 219th* (Exhibit K)

While under contempt exposure, he lacked any ethical authority to request or direct enforcement actions.

- Despite this, McEwan transmitted an **Order for Issuance of Writ of Attachment and Petition for Writ of Habeas Corpus (7.17.25)** (Exhibit L) built on the same unsigned temporary orders. This package was later used to mislead police that a lawful writ existed.
- The **Shuck papers** from Constable 6 (Exhibit M) show conflicting filing dates—“Oct. 3 2013” and later 2025 notations—confirming document tampering or reuse of prior case materials.

- The **OurFamilyWizard message log** (Exhibit N) demonstrates good-faith compliance and child-centered conduct, refuting any claim of “coaching” or “interference.” Jayroe repeatedly encouraged safety, communication, and counseling—not avoidance
-

Legal and Evidentiary Defects

1. **Fabricated Service Record** – The affidavit’s claim of “intentional avoidance” conflicts with the **absence of any service return** in the eFile docket and the clerk’s records (Tex. R. Civ. P. 106, 107).
 2. **Suppression of Exculpatory Evidence** – McEwan withheld the father’s filed objections and *OurFamilyWizard* correspondence showing full cooperation, violating Brady-type disclosure obligations when used to instigate criminal process.
 3. **Conflict of Interest and Contempt Status** – An attorney under direct-order violation (Exhibit K) cannot act as a “complaining witness.” Doing so converts the filing into retaliation under color of law.
 4. **Use of Void Writ as Probable Cause** – The *Writ of Habeas Corpus* (7.17.25) incorporated the unsigned temporary orders (Exhibit L), making any enforcement action arising from it **void ab initio** under Tex. R. Civ. P. 329b and Tex. Gov’t Code § 21.002.
 5. **Falsification of Governmental Record** – Transmitting or presenting altered judicial documents to police constitutes tampering under **Tex. Penal Code § 37.10** and federal obstruction under **18 U.S.C. § 1519**.
-

Conclusion

Every factual premise in the “avoidance” and “coaching” narrative is refuted by authenticated court filings, docket entries, and communications. McEwan’s actions—submitting unsigned orders as valid, concealing his own contempt, and misrepresenting service and visitation facts—form a clear pattern of **fraudulent evidence use, retaliation, and obstruction of justice**. These acts satisfy elements of **false statement** (18 U.S.C. § 1001), **deprivation of rights** (18 U.S.C. § 242), and **conspiracy against rights** (18 U.S.C. § 241), warranting immediate federal review.

Point 4 – Unlawful September 18, 2025 Arrest Based on Void Capias and Misrepresentation to Law Enforcement

The *Probable-Cause Affidavit for Interference* (Exhibit A) falsely asserts that Sgt. Owen confirmed an active capias warrant and lawfully arrested **Charles J. Jayroe** after consulting with Det. Schutz. In reality, Mr. Jayroe was present at the **Lewisville Police Department** by prior arrangement with Det. Schutz to report document fraud by attorney **Robert J. McEwan**. The NCIC/TCIC system showed **no active warrants**, and both officers were informed in real time that the referenced capias was void. Mr. Jayroe was detained roughly eight hours and released without charge, proving the arrest lacked probable cause.

Factual Background

- The “active” warrant described was the **April 17 2025 Order for Capias** issued on a *Second Amended Motion to Revoke Suspended Commitment* (Exhibit B). That order was **never e-filed contemporaneously** and later **re-submitted on September 22 2025** as a *Second Order for Capias and Recall of Warrant Issued April 17 2025* (Exhibit C). This retroactive filing demonstrates the absence of any valid authority at the time of arrest.
- The **August 1 2025 Bench-Trial Notice** (Exhibit D) issued by court coordinator **Amy Munger**, not the judge, scheduled a September 18 hearing but bears the notation “**Proposed Order**” on its reverse, confirming it was **not a signed judicial order**.
- Mr. Jayroe had already filed a **timely Objection and Motion to Vacate Void Scheduling Notice** (Exhibit E) on July 16 2025, preserving federal and appellate rights and proving no defiance of court authority.
- The **Sheriff’s Return of Service** (Exhibit F) shows **no personal service ever accomplished**, contradicting the affidavit’s claim of “intentional avoidance.”
- During the September 18 meeting, Mr. Jayroe was **cooperating** with Det. Schutz, explaining the invalidity of the same capias. Sgt. Owen repeatedly called Collin County attempting to “verify” the warrant and ultimately ordered arrest **despite NCIC confirmation of no active record**.
- Mr. Jayroe arrived at Denton County Jail about 7:30 p.m. and was released near 11:30 p.m. **without booking or charge**, conclusively establishing that no lawful basis existed for detention.

- All of these events occurred after jurisdiction had already shifted on **September 3 2025**, when the **Bill of Review** was accepted and the prior case (219-55128-2013) lost plenary power (Exhibit G).
-

Legal and Evidentiary Defects

1. **No Probable Cause (Tex. Code Crim. Proc. arts. 15.01, 15.04)** – A void, un-entered capias cannot satisfy the statutory standard for arrest.
 2. **Fourth Amendment Violation** – An arrest executed on a warrant later proven void is an unreasonable seizure as a matter of law.
 3. **Failure to Verify Authenticity** – Sgt. Owen and Det. Schutz relied solely on representations from McEwan and coordinator Munger, not on any certified court record. That omission meets the deliberate-indifference threshold for municipal liability under *Monell v. Department of Social Services*, 436 U.S. 658 (1978).
 4. **Due-Process Defect (Tex. R. Civ. P. 329b(f))** – Once the Bill of Review was filed and accepted (Exhibit G), all prior orders in the 219th were void *ab initio*; any capias or writ from that cause lacked jurisdictional foundation.
 5. **Suppression of Exculpatory Facts** – McEwan knowingly withheld that (i) no service return existed (Exhibit F), (ii) the bench-trial notice was only “proposed” (Exhibit D), and (iii) jurisdiction had shifted (Exhibit G). These omissions induced law enforcement to act unlawfully.
 6. **Municipal Exposure (42 U.S.C. § 1983)** – The City of Lewisville failed to train its officers to confirm warrant validity before detaining a citizen, creating direct *Monell* exposure.
-

Conclusion

The September 18 2025 arrest was executed **without any lawful warrant or judicial authorization**, violating the **Fourth and Fourteenth Amendments**. McEwan’s deliberate omissions caused officers to rely on a void capias, while Sgt. Owen’s insistence on arresting despite a negative NCIC check constitutes **false imprisonment under color of law**. The conduct warrants investigation for:

- **Deprivation of Rights (18 U.S.C. § 242)**
- **Conspiracy Against Rights (18 U.S.C. § 241)**
- **Falsification of Records (18 U.S.C. § 1519)**

- **Tampering with Governmental Record (Tex. Penal Code § 37.10)**
-

Point 5 – Fabrication and Circulation of Void “Temporary Orders” in Violation of TRCP and Collin County Local Rules

The *Probable-Cause Affidavit for Interference* (Exhibit A) relies on two purported sets of “Temporary Orders” that never existed as lawful filings:

- (1) the unsigned **July 9 / July 16 2025 ‘Proposed Temporary Orders’** (Exhibit B – Temporary Orders Fake 7.9.25 and 7.16.25.pdf), and
- (2) the **September 18 2025 ‘Temporary Orders’** later stamped and circulated by coordinator **Amy Munger** (Exhibit C – Temporary Orders Stamped by Munger 9.18.25.pdf).

Each is void ab initio under **Texas Rules of Civil Procedure (TRCP)** and **Collin County Local Rules**.

Factual Background

1. **No Actual July 9 Order Filed** – The only e-filed item on July 9 was *Mr. Jayroe’s Motion to Strike Unsigned ‘Temporary Orders’* demonstrating that McEwan’s supposed “Temporary Orders” were never submitted through the clerk or recorded in the docket. The document Jayroe moved to strike was therefore an extrajudicial draft, not an official court order as required by **TRCP 306a(2)** and **Local Rule 3.2(b)**.
2. **Unsigned and Unauthenticated Draft Used as Order** – The July draft bore no judge’s signature, no docket notation, and no certificate of service in accordance with **TRCP 21a** and **245**. Use of an unsigned instrument to represent a court ruling violates **TRCP 21(f)(8)** and **Local Rule 1.2**, which require that all orders be properly entered through the District Clerk.
3. **September 18 ‘Orders’ Filed After Jurisdiction Ended** – After the **Bill of Review** was accepted on **September 3 2025** (Exhibit D – Bill-of-Review Acceptance Notice), the 219th District Court lost all plenary power under **TRCP 329b(f)**. Despite that, on September 18 2025 Amy Munger stamped and circulated a new version of the same void draft as if it were a signed temporary order (Exhibit C). No judicial signature appears, and the electronic header identifies it as “Proposed Order,” making it facially invalid under **TRCP 306a(2)**.

4. **Retroactive and Back-Filed Entries** – The July draft was retro-dated (7/9 file time vs 7/16 signature date), violating **TRCP 21(f)(8)** and the County’s integrity-of-filing rule. Such back-dating and post-jurisdiction filing constitute tampering under **Tex. Penal Code § 37.10(a)(5)**.
 5. **Use to Support Warrants and Interference Charge** – McEwan and Munger relied on these void drafts to obtain the **Writ of Attachment (9/24/25)** and to influence Det. Owen’s probable-cause affidavit (Exhibit E – Writ of Attachment Amended Closed Case 9.24.25.pdf), thereby creating a false record in violation of **18 U.S.C. § 1519** and **TRCP 13** (sanctionable bad faith filings).
-

Procedural Violations Summary

Rule / Statute	Requirement	Violation Shown
TRCP 306a(2)	Orders take effect only when signed by the judge.	Both July and Sept versions unsigned.
TRCP 21a / 245	Proper service and reasonable notice required for custody actions.	None given for June 20 hearing or July filing.
TRCP 21(f)(8)	E-filings must preserve accurate timestamps.	Back-dated July entry (7/9 vs 7/16).
TRCP 329b(f)	After plenary power expires, orders void.	Sept 18 order post-Bill-of-Review.
Local Rule 3.2(b)	Unsigned drafts have no force of law.	Neither order docketed as signed.
Tex. Penal Code § 37.10	Using false government records is tampering.	Void orders circulated as real.

Conclusion

The record proves that the only lawful e-file on July 9 was Mr. Jayroe's own *Motion to Strike Unsigned Temporary Orders* and All other versions of "Temporary Orders" were fabrications never entered by the Court and later re-filed after jurisdiction expired. Their use to justify arrest and interference constitutes **tampering with governmental records, fraud on the court, and deprivation of rights under color of law (18 U.S.C. §§ 241–242)**.

Point 6 – Use of Forged 'Proposed Temporary Orders' in the Writ of Habeas Corpus and September 24 2025 Child Seizure

The *Petition for Writ of Habeas Corpus for Return of Child and Attachment* (Exhibit A) relied on **unsigned 'Proposed Temporary Orders'** created by **Robert J. McEwan** and **Amy Munger** and never signed or entered by the Court. These drafts, later falsely "file-stamped" on **September 18 2025** by Deputy Clerk **Megan Mellett**, were then used to justify an unlawful seizure of [REDACTED] Jayroe on September 24 2025. Each instrument was **void ab initio** under the **Texas Rules of Civil Procedure (TRCP)** and **Collin County Local Rules**.

Factual Background

1. Habeas Petition Relied on Unsigned July Drafts

The July 17 2025 petition (Exhibit A) attached the **unsigned July 9 and July 16 draft orders** (Exhibit B – Temporary Orders Fake 7.9.25 and 7.16.25.pdf). Those drafts were never filed or docketed, and the only official entry on 7/9 was Mr. Jayroe's own *Motion to Strike Unsigned Temporary Orders* By attaching those drafts, McEwan misrepresented them as operative orders in violation of **TRCP 306a(2)** and **Local Rule 3.2(b)**, which require a judge's signature and clerk entry before an order takes effect.

2. No Service or Notice of Hearing

Constable returns (Exhibit E – No Service Sheriff Return on Jayroe.pdf) show no service of the June 20 hearing notice. This violates **TRCP 21a** and **245**, as well as **Family Code § 157.061(b)**, which mandate reasonable notice for custody hearings.

3. Writ of Attachment Issued After Loss of Jurisdiction

The *Writ of Attachment for Minor Child* dated 9/24/25 (Exhibit F – Writ of

Attachment Amended Closed Case 9.24.25.pdf) issued after the **Bill of Review was accepted on 9/3/25**, when the court’s plenary power had ended under **TRCP 329b(f)** and **Collin County Local Rule 4.03** (“No further orders shall issue once jurisdiction has expired”).

4. **Clerk’s Stamp Misuse and Absence of Judicial Signature**

The 9/18/25 document (Exhibit H – Temporary Orders Filed 9.18.25.pdf) was filed under **Envelope ID 105788521**, stamped “Filed 9/18/2025 3:01 PM – Michael Gould, District Clerk, By: Megan Mellett, Deputy.” It bears **no judge’s signature — only a typed name of Judge Edgeworth**. The filing metadata shows submission by **Amy Munger**, not by the Court, and coded as a “Signed Order” in violation of:

Rule / Provision	Requirement	Violation Shown
TRCP 306a(2)	Order effective only when signed by judge	No signature; only Mellett’s stamp
TRCP 21(f)(8)	Filings must not misstate nature of document	Filed as “Signed Order” though unsigned
TRCP 329b(f)	Court lacks power after Bill of Review accepted	Filed post-jurisdiction (9/18 > 9/3)
Local Rule 1.2	Prohibits unauthorized filing of draft orders	Munger submitted draft as final order
Local Rule 3.2(b)	Order valid only if signed by judge & entered by clerk	No signature by Edgeworth

5. Thus, the Mellett-stamped document is an **unsigned, post-jurisdiction draft** misrepresented as an order. It is not “entered by the court” under **TRCP 306a** and constitutes **tampering with a governmental record** under **Tex. Penal Code § 37.10(a)(5)**.

6. **False Sworn Statements to Obtain Enforcement**

McEwan and Munger falsely swore that Mr. Jayroe was “withholding the child in violation of court orders.” The record shows no valid orders existed and Mr. Jayroe had already filed timely motions to strike and vacate (Exhibits C and I).

This constitutes **perjury (Tex. Penal Code § 37.02)** and **fraud on the court (TRCP 13)**.

7. Child Seized Under Color of Law

The void writ was executed on September 24 2025 without notice, hearing, or signed authority, resulting in [REDACTED]'s unlawful removal from school (Exhibit F).

The seizure occurred under documents known to be forged and filed after jurisdiction had ended, constituting **kidnapping under color of law** and violations of the **Fourth and Fourteenth Amendments**.

Summary of Rule and Statutory Violations

Rule / Statute	Violation by McEwan & Munger (9/18–9/24 Series)
TRCP 306a(2)	No judge's signature on order = ineffective filing
TRCP 21(f)(8)	Mis-coded unsigned draft as "Signed Order"
TRCP 329b(f)	Filed after jurisdiction expired (9/3 Bill of Review)
Local Rules 1.2 & 3.2(b)	Unauthorized filing and entry of unsigned order
Local Rule 4.03	Court may not act after transfer or expiration of power
Tex. Penal Code § 37.10	Tampering with government record (Mellett stamp on void order)
Tex. Penal Code § 32.21	Forgery (false execution of court instrument)
18 U.S.C. §§ 241–242	Deprivation of rights under color of law
18 U.S.C. § 1519	False record filed within U.S. court jurisdiction

Conclusion

The *Writ of Habeas Corpus* and *Writ of Attachment* issued in September 2025 were founded on documents that were never signed by a judge, never lawfully entered by the clerk, and filed after jurisdiction had been extinguished. Deputy Clerk **Megan Mellett's** stamp and **Amy Munger's** submission under the guise of a "signed order" constituted **tampering with a governmental record** and rendered every subsequent writ **void ab initio**. The resulting seizure of [REDACTED] [REDACTED] yroe on September 24 2025 was a **deprivation of constitutional rights** and must be recognized as a criminal abuse of process requiring vacatur and federal review.

Crain (02:11):

I Have the text message.

██████ (02:12):

Okay. What'd you do to me?

Crain (02:14):

I mean, I made mistakes and I said things I didn't mean for a long time. I know I had, I shouldn't get so upset and I've been working on that.

██████ (02:31):

Oh yeah. You've been working on it. You have me who?

Crain (02:37):

Yes, I was reading. I was talking to all kinds of people. I could meditate, I yoga, all I ever wanted was to be a good mom.

██████ (02:51):

Well, none of this is real.

Crain (03:00):

Whatcha talking about this isn't real? You have got to find a way to work on this and to try. All I want is

██████ (03:17):

Try what? Living with you again so I can get abused for another two years of my life.

Crain (03:21):

██████, I'm not going to abuse you.

██████ (03:25):

Maybe you should have...

Crain (03:26):

All I want is for you to be happy and friends with me....

██████ (03:29):

Hey hindsight is 2020 but the deed is done.

Crain (03:37):

██████ what do you want me to say? We have got to move forward and get better. Don't you want to come live with me?

Crain (07:18):

██████ I was wrong and made mistakes and I said things I didn't mean I have

██████ (07:25):

No. Are you going to cry fake tears again like last time you're crocodile tears mean nothing to me.

Crain (07:31):

██████ do you understand how hard this has been on me?

██████ (07:33):

Do you understand how hard it's been on me? I'm sorry that you're the abuser and I'm the one that got abused. I'm sure it's so hard for you.

Crain (07:42):

I'm sorry I never meant, I tried to apologize

Crain (07:42):

I tried to, I wanted this the next day I wanted to talk to you the next day.

██████ (07:47):

No you didn't. No you didn't.

Crain (07:49):

██████ honey. I have those texts

██████ (07:51):

All the texts you sent my dad and that you sent me? Really? Yeah. All right.

Crain (07:56):

Yeah, They all said, I'm sorry and I want ██████ home and I want you with me

██████ (07:59):

I'm sorry that ██████ did this. I'm sorry that you feel this way. Those are faux apologies. Fake apologies.

Crain (08:07):

██████, I told you I didn't mean what I said. And that I'm sorry

██████ (08:10):

What you said? it's not about what you said. I mean part of it's about that, but it's about what you've been doing for the past two and a half years of my life. It's what you do to every guy. You do it to Paul, rusty. You've done it to all of them. You do it to echo, you do it to the dog.

██████ (10:51):

I wish that were true. I wish you were a normal person that actually cared, but that's just not the case.

Crain (10:58):

You Know your whole life, everything I've done is for you.

██████ (10:59):

I wish that was true.

██████ (11:04):

Really? When you're holding me up against a wall choking me and punching me in the face. That was for me. Right

Crain (11:10):

██████? That was out of control and I'm sorry.

██████ (11:12):

You are out of control. You still are

Crain (11:13):

No, I'm not ever going to do anything like that again.

██████ (11:18):

Okay That's your opinion.

Crain (11:21):

It's true.

██████ (11:22):

Okay.

Crain (11:25):

All I can say is I love you and I didn't want any of this

██████ (11:31):

You don't know anything, okay? This is nothing. You're saying this. Nothing is happening here. We're both forced to be here. You don't care that we're forced to.

Crain (11:40):

I don't. I asked for this. I see one. I'm not forced to be here. I want to be here. I would do anything just to spend 1 minute with you. I want to be with my son.

██████ (13:00):

I guarantee you're here because your attorney told you to be here. Guaranteed

Crain (13:05):

██████, I'm here because I'm fighting for you.

██████ (13:07):

You're not fighting for anything. You're fighting for yourself.

Crain (13:11):

What are you talking about? I've been begging for you to stay, go meet every once a week

██████ (13:16):

And I've been begging to stay away from my abuser. It's emotional torture. What you do. You do it to everyone, not just me. Emotional torture.

Crain (13:34):

Again, I just want to get to a life where we can have a good relationship and

██████ (13:41):

At a time. I did too, but that's not true. And you don't care. So I gave you chances and you just lied back then and you're still lying now. That's all. Sometimes that's all I think you know how to do is lie.

Crain (13:57):

I've never lied. Tell me what I'm lying about.

██████ (13:59):

That's funny.

Crain (14:01):

What am I lying about ████████?

██████ (14:02):

I Just told you twice about everything you've lied about.

Crain (14:06):

You think I Don't care about you?

██████ (14:08):

You don't. You clearly don't.

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

NO. 219-55128-2013

IN THE INTEREST OF

[REDACTED] JAYROE,

A CHILD

§
§
§
§
§

IN THE DISTRICT COURT

219TH JUDICIAL DISTRICT

COLLIN COUNTY, TEXAS

TEMPORARY ORDERS IN SUIT TO MODIFY PARENT-CHILD RELATIONSHIP

On June 20, 2025, the Court heard Petitioner's application for temporary orders.

Appearances

Petitioner, KENDRA CAMILLE CRAIN, appeared physically in the courtroom. Petitioner's attorney of record, Robert J. McEwan, appeared physically in the courtroom and announced ready.

Respondent, CHARLES JEFFERSON JAYROE, although duly and properly notified, did not appear and wholly made default.

Jurisdiction

The Court, after examining the record, and hearing the evidence and argument of counsel, finds that all necessary prerequisites of the law have been legally satisfied and that this Court has jurisdiction of this case and of all the parties.

Conservatorship

The following orders are for the immediate safety and welfare and in the best interest of the following child:

Name: [REDACTED] Jayroe
Sex:
Birth date: 03/15/2010
Home state: Texas

The Court specifically finds that the orders herein are necessary because the child's present circumstances significantly impair the child's physical health and emotional development.

IT IS ORDERED that KENDRA CAMILLE CRAIN and CHARLES JEFFERSON JAYROE are appointed Temporary Joint Managing Conservators of the following child: [REDACTED]

[REDACTED] Jayroe.

IT IS ORDERED that KENDRA CAMILLE CRAIN, as parent temporary joint managing conservator, shall have the following rights and duty:

1. the exclusive right to consent to medical, dental, and surgical treatment involving invasive procedures;
2. the exclusive right to consent to psychiatric and psychological treatment of the child;
3. the exclusive right to represent the child in legal action and to make other decisions of substantial legal significance concerning the child;
4. the right to consent to marriage and to enlistment in the armed forces of the United States shall be mutual;
5. ~~the exclusive right to make decisions concerning the child's education;~~
6. except as provided by section 264.0111 of the Texas Family Code, the exclusive right to the services and earnings of the child;
7. except when a guardian of the child's estate or a guardian or attorney ad litem has been appointed for the child, the exclusive right to act as an agent of the child in relation to the child's estate if the child's action is required by a state, the United States, or a foreign government;
8. the exclusive right to apply for a passport for the child, to renew the child's passport, and to maintain possession of the child's passport; and
9. the duty to manage the estate of the child to the extent the estate has been created by the community or joint property of the parent.

Except as expressly provided otherwise in this temporary order, IT IS ORDERED that all

information of which a conservator is required to notify the other conservator and all documents and information that a conservator is required to provide to the other conservator shall be sent in the following manner:

- a. providing the document to the recipient by posting the document on the Our Family Wizard Internet website program, in accordance with this Court's prior orders.

Possession and Access

IT IS ORDERED that nothing in this order shall supersede any term of any protective order or condition of bond, probation, or parole.

1. Possession Order

IT IS ORDERED that Charles Jefferson Jayroe is not entitled to any possession of or access to the child, [REDACTED] [REDACTED] Jayroe, until further order of this Court and at least not until this Court reviews the psychological evaluation of Charles Jefferson Jayroe ordered hereinbelow and this Court has further hearing regarding same.

IT IS ORDERED that Kendra Camille Crain shall be entitled to possession of the child, [REDACTED] [REDACTED] Jayroe, at all times until further order of this Court, as ordered immediately above.

2. Other Possession Provisions

In addition to all other provisions for possession provided in this order, the following periods of possession are ORDERED:

1. IT IS ORDERED that the parties shall not allow the child any contact with Tina Dominy until further order of this Court.

3. Duration

The periods of possession ordered above apply to the child the subject of this suit

while that child is under the age of eighteen years and not otherwise emancipated.

4. Termination of Orders

The provisions of this order relating to conservatorship, possession, or access terminate on the remarriage of KENDRA CAMILLE CRAIN to CHARLES JEFFERSON JAYROE unless a nonparent or agency has been appointed conservator of the child under chapter 153 of the Texas Family Code.

Child Support

Termination of Child Support

The Court ORDERS that the recurring monthly child support obligation of KENDRA CAMILLE CRAIN for the support of the child, [REDACTED] Jayroe, is SUSPENDED as of June 20, 2025.

Psychological Evaluation

IT IS ORDERED that Benjamin J. Albritton, Psy. D., ABPP is appointed to interview, examine, evaluate, and consult with Respondent to prepare a psychological evaluation of Respondent. Respondent is ORDERED to pay the cost of the evaluation of Respondent when Benjamin J. Albritton, Psy. D., ABPP requests payment. Petitioner and Respondent are ORDERED to contact Benjamin J. Albritton, Psy. D., ABPP at 8150 North Central Expressway, Ste. 1450, Dallas, Texas 75206; [REDACTED], within 7 days of the date of these temporary orders to schedule the evaluation. Petitioner and Respondent are further ORDERED to cooperate with Benjamin J. Albritton, Psy. D., ABPP and attend all appointments, interviews, tests, and evaluations scheduled with Benjamin J. Albritton, Psy. D., ABPP. IT IS ORDERED that Benjamin J. Albritton, Psy. D., ABPP shall provide a copy of Respondent's evaluation to each party and each party's attorney and shall not file the evaluation with the Court. IT IS

ORDERED that Petitioner and Respondent shall execute all necessary releases to allow the parties and their attorneys to possess the evaluation, to use it in depositions in this suit, and to offer it into evidence in this suit.

Execution of Releases

Within 10 days after receipt of a written request from the other conservator, the conservator receiving the request is ORDERED to execute and provide to the requesting conservator -

1. all necessary releases pursuant to the Health Insurance Portability and Accountability Act (HIPAA) and 45 C.F.R. section 164.508 to permit the other conservator to obtain health-care information regarding the child; and

2. for all health-care providers of the child, an authorization for disclosure of protected health information to the other conservator pursuant to the HIPAA and 45 C.F.R. section 164.508.

Each conservator is further ORDERED to designate the other conservator as a person to whom protected health information regarding the child may be disclosed whenever the conservator executes an authorization for disclosure of protected health information pursuant to the HIPAA and 45 C.F.R. section 164.508.

Injunction

The Court finds that, based on the public policy considerations stated in section 153.001 of the Texas Family Code, it is in the best interests of the child that the following temporary injunction be issued and related orders be entered.

IT IS ORDERED that CHARLES JEFFERSON JAYROE and his agents, servants, employees, attorneys, and those persons in active concert or participation with him who receive

actual notice of this order by personal service or otherwise are temporarily enjoined from:

1. Disturbing the peace of the child or of any other party.
2. Hiding or secreting the child from the other party.
3. Making disparaging remarks regarding the other party or the other party's family in the presence or within the hearing of the child.
4. Consuming alcohol within the 12 hours before or during each of the parties' periods of possession of or access to the child.
5. Canceling, altering, failing to renew or pay premiums on, or in any manner affecting the level of coverage that existed at the time this suit was filed of, any health insurance policy insuring the child.
6. Removing the child beyond Collin County, Texas, acting directly or in concert with others.

Required Notices

NOTICE TO ANY PEACE OFFICER OF THE STATE OF TEXAS: YOU MAY USE REASONABLE EFFORTS TO ENFORCE THE TERMS OF CHILD CUSTODY SPECIFIED IN THIS ORDER. A PEACE OFFICER WHO RELIES ON THE TERMS OF A COURT ORDER AND THE OFFICER'S AGENCY ARE ENTITLED TO THE APPLICABLE IMMUNITY AGAINST ANY CLAIM, CIVIL OR OTHERWISE, REGARDING THE OFFICER'S GOOD FAITH ACTS PERFORMED IN THE SCOPE OF THE OFFICER'S DUTIES IN ENFORCING THE TERMS OF THE ORDER THAT RELATE TO CHILD CUSTODY. ANY PERSON WHO KNOWINGLY PRESENTS FOR ENFORCEMENT AN ORDER THAT IS INVALID OR NO LONGER IN EFFECT COMMITS AN OFFENSE THAT MAY BE PUNISHABLE BY CONFINEMENT IN JAIL FOR AS LONG AS TWO YEARS

AND A FINE OF AS MUCH AS \$10,000.

THE COURT MAY MODIFY THIS ORDER THAT PROVIDES FOR THE SUPPORT OF A CHILD IF:

(1) THE CIRCUMSTANCES OF THE CHILD OR A PERSON AFFECTED BY THE ORDER HAVE MATERIALLY AND SUBSTANTIALLY CHANGED; OR

(2) IT HAS BEEN THREE YEARS SINCE THE ORDER WAS RENDERED OR LAST MODIFIED AND THE MONTHLY AMOUNT OF THE CHILD SUPPORT AWARD UNDER THE ORDER DIFFERS BY EITHER 20 PERCENT OR \$100 FROM THE AMOUNT THAT WOULD BE AWARDED IN ACCORDANCE WITH THE CHILD SUPPORT GUIDELINES.

Warnings

WARNINGS TO PARTIES: FAILURE TO OBEY A COURT ORDER FOR CHILD SUPPORT OR FOR POSSESSION OF OR ACCESS TO A CHILD MAY RESULT IN FURTHER LITIGATION TO ENFORCE THE ORDER, INCLUDING CONTEMPT OF COURT. A FINDING OF CONTEMPT MAY BE PUNISHED BY CONFINEMENT IN JAIL FOR UP TO SIX MONTHS, A FINE OF UP TO \$500 FOR EACH VIOLATION, AND A MONEY JUDGMENT FOR PAYMENT OF ATTORNEY'S FEES AND COURT COSTS.

FAILURE OF A PARTY TO MAKE A CHILD SUPPORT PAYMENT TO THE PLACE AND IN THE MANNER REQUIRED BY A COURT ORDER MAY RESULT IN THE PARTY'S NOT RECEIVING CREDIT FOR MAKING THE PAYMENT.

FAILURE OF A PARTY TO PAY CHILD SUPPORT DOES NOT JUSTIFY DENYING THAT PARTY COURT-ORDERED POSSESSION OF OR ACCESS TO A CHILD. REFUSAL BY A PARTY TO ALLOW POSSESSION OF OR ACCESS TO A

CHILD DOES NOT JUSTIFY FAILURE TO PAY COURT-ORDERED CHILD SUPPORT TO THAT PARTY.

Duration

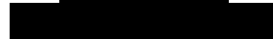
These Temporary Orders shall continue in force until the signing of the final order or until further order of this Court.

SIGNED on 7/16/2025.



JUDGE PRESIDING

Submitted by:
Robert McEwan

 Ste. 450
 6092


Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Donna Waldon on behalf of Robert McEwan

[REDACTED]

Filing Code Description: Proposed Order
Filing Description: Temporary Orders in Suit to Modify Parent-Child Relationship
Status as of 7/17/2025 10:27 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Timothy Avery	1456040	[REDACTED]	7/9/2025 11:51:33 AM	SENT
Rob McEwan		[REDACTED]	7/9/2025 11:51:33 AM	SENT
Donna Lynn Waldon		[REDACTED]	7/9/2025 11:51:33 AM	SENT
Charles JeffersonJayroe		[REDACTED]	7/9/2025 11:51:33 AM	SENT
Kendra Crain		[REDACTED]	7/9/2025 11:51:33 AM	SENT
Hon. Ray Wheless		[REDACTED]	7/9/2025 11:51:33 AM	SENT

CRIMINAL COMPLAINT AND NOTICE OF FELONY MISCONDUCT

*RE: Criminal Complaint – Judicial and Attorney Misconduct, Conspiracy, Child
Endangerment, and Fraud*

Reference Case:

*Cause No. 219-55128-2013 – In the Interest of J.H.J., a Child
219th Judicial District Court, Collin County, Texas*

FILED BY:

Charles J. Jayroe

[REDACTED]
Lewisville, TX 75056

[REDACTED]

DATE: April 4, 2025

SUBMITTED TO:

**Collin County District Attorney's
Office**

Collin County Courthouse

[REDACTED]
McKinney, TX 75071

Attention: Special Prosecutor Request

CRIMINAL COMPLAINT AND NOTICE OF FELONY MISCONDUCT

*RE: Criminal Complaint – Judicial and Attorney Misconduct, Conspiracy, Child
Endangerment, and Fraud*

Reference Case:

*Cause No. 219-55128-2013 – In the Interest of J.H.J., a Child
219th Judicial District Court, Collin County, Texas*

FILED BY:

Charles J. Jayroe

[REDACTED]
Lewisville, TX 75056

[REDACTED]

DATE: April 4, 2025

SUBMITTED TO:

**Collin County District Attorney's
Office**

Collin County Courthouse

[REDACTED]
McKinney, TX 75071

Attention: Special Prosecutor Request

NATURE OF FILING:

This document constitutes a formal **Criminal Complaint and Request for Special Prosecutor** for investigation and prosecution of criminal conduct directly arising from and surrounding the above-referenced family court case.

This filing includes allegations of:

- **Felony Perjury**
- **Conspiracy to Obstruct Justice**
- **Abuse of Official Capacity and Process**
- **Official Oppression**
- **Fraud Upon the Court**
- **Misprision of Felony**
- **Violation of Mandatory Reporting Laws**
- **Retaliation Against a Whistleblower Parent**
- **Judicial Misconduct and Negligence**
- **Malicious Prosecution and Child Endangerment**

A full narrative and legal analysis are included in the attached complaint document. Supporting documentation and exhibits will be made available to assigned law enforcement or investigative officials upon request.

Filed By:

/s/ Charles J. Jayroe

April 4, 2025

SUMMARY OF CRIMINAL COMPLAINT

Pursuant to Texas and federal criminal law, I, **Charles J. Jayroe**, a private citizen and whistleblower, respectfully submit this formal **Criminal Complaint and Request for Special Prosecutor** for investigation and prosecution of criminal conduct directly arising from and surrounding Family Law Cause No. 219-55128-2013 – *In the Interest of J.H.J., a Child*.

This complaint outlines ongoing and coordinated misconduct, including but not limited to: felony perjury, conspiracy to obstruct justice, child endangerment, abuse of process, malicious prosecution, retaliation against a whistleblower, suppression of evidence, dereliction of official duties, and aiding and abetting known violations by licensed legal professionals and judges.

I have reserved all evidentiary exhibits for presentation to law enforcement and designated oversight bodies, including the Texas Rangers, FBI, DOJ, and the Chief Disciplinary Counsel of the State Bar of Texas.

LIST OF NAMED DEFENDANTS & CONTACT INFORMATION

1. Hon. Jennifer Edgeworth

Judge, 219th District Court
Collin County Courthouse
[REDACTED], McKinney, TX 75071

2. Hon. Ray Wheless

Regional Presiding Judge, 1st Administrative Judicial Region
Collin County Courthouse
[REDACTED], McKinney, TX 75071

3. Robert James McEwan

Attorney at Law – KoonsFuller, P.C.
[REDACTED], Suite 450
Southlake, TX 76092
[REDACTED]

4. Kendra Camille Crain

Party to Case No. 219-55128- [REDACTED]
[REDACTED]

Plano, TX 75093
[REDACTED]

5. Dr. Emily Van Pelt

Licensed Mental Health Professional

[REDACTED], Suite 682

Dallas, TX 75225
[REDACTED]

6. Jacqueline Crain Powers (aka Jaki Crain)

[REDACTED]
Denison, TX 75020
[REDACTED]

7. KoonsFuller, P.C.

Law Firm Representing Ms. Crain

[REDACTED] #2200

Plano, TX 75093

Main Line: [REDACTED]

8. State Bar of Texas – Office of Chief Disciplinary Counsel

1414 Colorado St

Austin, TX 78701
[REDACTED]
[REDACTED]

9. State Commission on Judicial Conduct (SCJC)

P.O. Box 12265

Austin, TX 78711
[REDACTED]
[REDACTED]

Filed By:

Charles J. Jayroe

April 4, 2025

SUMMARY OF CRIMINAL COMPLAINT

Pursuant to Texas and federal criminal law, I, **Charles J. Jayroe**, a private citizen and whistleblower, respectfully submit this formal **Criminal Complaint** against the following parties:

1. **Judge Jennifer Edgeworth**
2. **Judge Ray Wheless, Regional Presiding Judge**
3. **Robert James McEwan, Attorney at Law**
4. **Kendra Camille Crain**
5. **Dr. Emily Van Pelt**
6. **Jacqueline Crain Powers**
7. **KoonsFuller, P.C.** (law firm representing Ms. Crain and employer of Mr. McEwan)
8. **State Bar of Texas – Office of Chief Disciplinary Counsel**
9. **State Commission on Judicial Conduct (SCJC)**

This complaint outlines ongoing and coordinated misconduct, including but not limited to: felony perjury, conspiracy to obstruct justice, child endangerment, abuse of process, malicious prosecution, retaliation against a whistleblower, suppression of evidence, dereliction of official duties, and aiding and abetting known violations by licensed legal professionals and judges.

The facts supporting this complaint arise from Family Law Cause No. 219-55128-2013, currently before the 219th District Court of Collin County, Texas.

I have reserved all evidentiary exhibits for presentation to law enforcement and designated oversight bodies, including the Texas Rangers, FBI, DOJ, and the Chief Disciplinary Counsel of the State Bar of Texas.

CRIMINAL ACTS AND VIOLATIONS (Summary)

A. Robert James McEwan / KoonsFuller, P.C.

- Knowingly submitted and relied upon false testimony and fraudulent affidavits in violation of **Tex. Penal Code § 37.02 (Perjury)**;
- Committed abuse of process under **Tex. Civ. Prac. & Rem. Code § 10.001**, misusing legal procedures for improper purposes;
- Engaged in malicious prosecution by advancing baseless legal actions with retaliatory intent, violating clearly established rights (*Richey v. Brookshire Grocery Co.*, 952 S.W.2d 515, 517 [Tex. 1997]);
- Interfered with mental health professionals, manipulating therapy outcomes and breaching confidentiality to control litigation outcomes;
- Acted in coordination with others to defraud the court, violating **18 U.S.C. § 371 (Conspiracy to Defraud the United States)** and **Tex. Penal Code § 15.02 (Criminal Conspiracy)**;
- KoonsFuller, P.C. knowingly failed to discipline or respond to these violations despite notice, thereby enabling the misconduct.

B. Judge Jennifer Edgeworth

- Ignored statutory stay under **Tex. R. Civ. P. 18a(f)** triggered by Plaintiff's Verified Motions to Recuse;
- Suppressed material evidence of child abuse despite admissible audio confessions;
- Repeatedly refused to investigate or report known felony conduct, constituting **Misprision of Felony** under **18 U.S. Code § 4**;
- Her failure to act on known misconduct and abuse violates **Tex. Penal Code § 39.03 (Official Oppression)** and **§ 39.02 (Abuse of Official Capacity)**;
- Her continued rulings under conditions of disqualification and known jurisdictional conflict further constitute **Obstruction of Justice** under **18 U.S.C. § 1503**, and pattern of **Fraud Upon the Court**;

- During a private in-chambers interview with the child, Judge Edgeworth was informed directly by the minor of physical abuse inflicted by the mother. Despite this firsthand disclosure, she failed to report the abuse to CPS or any agency, in violation of **Tex. Fam. Code § 261.101 (Mandatory Reporting)** applicable to judges;
- In open court, Judge Edgeworth later claimed that she was “not there the day of the assault,” and therefore could not confirm what happened—effectively discrediting the child’s account and supporting findings that ignored the abuse;
- When directly questioned by Plaintiff, she denied calling anyone a liar, despite having entered findings that by implication rejected the child’s testimony of abuse.

The persistent and unlawful conduct by Judge Jennifer Edgeworth—including suppression of admissible evidence of child abuse, refusal to comply with mandatory reporting laws, and repeated rulings in direct contradiction to law and evidence—strongly suggests that her actions were not merely negligent, but motivated by external influence.

The only plausible explanation for such sustained judicial misconduct in the face of overwhelming proof of abuse is that Judge Edgeworth has been improperly influenced—most likely through financial contributions or favors from individuals connected to this case. It is reasonable to infer that Jacqueline Crain Powers, or another associate connected to Kendra Crain or the law firm KoonsFuller, may have made undisclosed campaign contributions or financial incentives to Judge Edgeworth in exchange for favorable rulings. This would constitute a serious violation of both state and federal anti-corruption laws and calls for immediate investigation.

No ethical or law-abiding judge would willingly suppress a child’s outcry of abuse—especially after personally interviewing the child, hearing a confession of physical assault from the abuser, and receiving corroborating evidence—unless compelled by a corrupt interest to do so. The pattern here is not one of error or oversight; it is one of deliberate protection of abusers, obstruction of justice, and abuse of judicial office for unlawful purposes.

C. Judge Ray Wheless, Regional Presiding Judge

- Failed to timely and impartially assign motions to recuse Judge Edgeworth, despite repeated filings and required referrals under **Tex. R. Civ. P. 18a(g)(1)**;
- Delayed appointment of neutral judges or improperly supported Judge Edgeworth's continued rulings during disqualification periods, thereby violating the procedural protections afforded under Texas law;
- His failure to act allowed improper jurisdictional rulings, amounting to **derelection of duty** and obstruction of judicial fairness (*In re Union Pac. Res. Co.*, 969 S.W.2d 427, 428 [Tex. 1998]).

D. Kendra Camille Crain

- Committed felony perjury under **Tex. Penal Code § 37.02**, repeatedly providing false statements under oath;
- Assaulted a minor child on May 12, 2023, then falsely denied the incident, despite recorded confession;
- Participated in litigation abuse in conjunction with McEwan and KoonsFuller, undermining the safety and welfare of the minor.

E. Dr. Emily Van Pelt

- Failed to report known abuse in violation of **Tex. Fam. Code § 261.101 (Mandatory Reporting)**;
- Gave materially false statements under oath concerning the mental health of the child without full disclosure of abuse history;
- Breached professional and legal standards governed by the **Texas Behavioral Health Executive Council**, enabling further harm.

F. Jaki Crain

- Financed litigation involving known fraud and perjury to prevent custody reform and enable further abuse;
- Participated in an ongoing **civil conspiracy** under **Tex. Civ. Prac. & Rem. Code § 71.002**, providing resources and influence to facilitate wrongful litigation outcomes (*Triplex Commc 'ns, Inc. v. Riley*, 900 S.W.2d 716 [Tex. 1995]).

G. State Bar of Texas – Office of Chief Disciplinary Counsel

- Refused to investigate or act upon verified, documented misconduct by licensed attorney Robert McEwan, despite multiple submissions of evidence and criminal allegations;
- Dismissed complaints with form-letter responses, failing to perform independent inquiry or follow disciplinary guidelines under **Tex. Gov't Code § 81.072**;
- Enabled continued misconduct through **deliberate inaction**, constituting a failure of oversight and complicity with ongoing violations.

H. State Commission on Judicial Conduct (SCJC)

- Failed to investigate verified complaints and audio evidence confirming judicial misconduct, abuse of discretion, and suppression of evidence by Judge Edgeworth;
 - Issued blanket dismissals without explanation, thereby obstructing public accountability in violation of **Tex. Const. Art. V, § 1-a**;
 - Actively denied due process to a whistleblower parent by permitting unchecked judicial bias and retaliation.
-

RELIEF REQUESTED

I hereby request that a **special prosecutor** be appointed to investigate the coordinated criminal actions described herein. This case represents not just private injustice, but a systemic failure of legal ethics, child protection, and judicial accountability.

I am available to provide full documentation and testimony to any designated law enforcement or prosecutorial authority.

The public has a right to know, and no parent should be retaliated against for exposing abuse.

Respectfully submitted,

/s/ Charles J. Jayroe

April 4, 2025

**STATE OF TEXAS §
COUNTY OF DENTON§**

BEFORE ME, the undersigned authority, on this day personally appeared **Charles J. Jayroe**, known to me or proved to me through satisfactory evidence to be the person whose name is subscribed to the foregoing instrument titled “**Criminal Complaint and Notice of Felony Misconduct**”, and who, after being by me duly sworn, stated upon oath that the statements and allegations contained therein are true and correct to the best of his knowledge, information, and belief.

SUBSCRIBED AND SWORN TO BEFORE ME, on this 4TH day of April, 2025, by **Charles J. Jayroe**.

Notary Public, State of Texas

[Seal]

My Commission Expires: _____

**CRIMINAL COMPLAINT
AGAINST JUDGE LINDSEY WYNNE
TO: 416th District Court, Collin County, State of Texas**

Complainant:

[REDACTED]

Phone: [REDACTED]

Email: [REDACTED]

Accused:

Judge Lindsey Wynne
468th District Court
Collin County, Texas

I. INTRODUCTION

I, **TARIQ FAROOQ**, the father of a severely disabled special needs child, submit this **criminal complaint** against **JUDGE LINDSEY WYNNE** of the 468th District Court, Collin County, Texas. This complaint outlines multiple violations of the **Texas Penal Code**, including but not limited to **official oppression, tampering with government records, abuse of office, unlawful seizure of my phone without a warrant, retaliation for my protests, suspicious backdating of orders, violation of due process** and other criminal acts in my divorce and child custody case (Cause No. 468-51752-2020) that clearly demonstrate criminal conduct on multiple counts as shown below. These acts show a **consistent and repeated pattern** of abuse of office, official oppression, judicial bias, judicial misconduct, retaliation for my peaceful protests against her and intentional harm to me and my special needs severely disabled child born with [REDACTED] [REDACTED]. Shown below are just *some* of the criminal acts that Judge Wynne has perpetuated against me and my special need child over four years of litigation; More details of her criminal activity are available in the attached Motion to Disqualify. *I have extensive and*

comprehensive evidence in my possession: Court Transcripts, Rulings/Orders, Audios/Videos and other document evidence to support my claims against Judge Wynne. To reiterate A SPECIAL NEEDS CHILD BORN WITH A RARE CHROMOSOMAL DISORDER “TETRASOMY 18p” HAS BEEN AND CONTINUES TO BE SEVERELY HARMED BY JUDGE WYNNE’S ILLEGAL CONDUCT.

I. ALLEGATIONS OF CRIMINAL CONDUCT

1. Aggravated Perjury by the Opposing Party Ignored by Judge Wynne

- a. During the **Final Jury Trial from June 24 to June 26, 2024**, the opposing party was caught committing **aggravated perjury** on several material matters. This was brought to the court's attention with clear evidence of false testimony, but Judge Wynne **ignored the perjury and allowed the testimony to sway and influence the outcome in opposing party’s favor** thereby, resulting in clear and open acts of manipulating/prejudicing the jury.
- b. Intentionally ignoring material perjury in court proceedings, while refusing to admit key properly introduced evidence from my side resulting in **willful evidence suppression**, shows clear **criminal misconduct** and **judicial bias**. By willfully allowing perjured testimony to sway the case, Judge Wynne engaged in **official oppression and abuse of official capacity** under Texas Penal Code § **39.03 & 39.02**.

2. Denial of ADA Accommodations

- a. Throughout the proceedings of the Motion to Modify Parent Child Relationship, I requested **ADA accommodations** due to my severe hearing disability (tinnitus) and hearing loss to enable me to adequately participate in court proceedings. Despite repeated requests, **Judge Wynne denied me any ADA accommodations**, refusing to provide extra time or adjust the pace of the hearings or offer me CART services leaving me at a significant loss on understanding some of the proceedings, responding to them and presenting my case adequately.
- b. This refusal violated my rights under the **Americans with Disabilities Act (ADA)** and constituted **criminal misconduct** by **intentionally** creating a **unfair disadvantage** for me during the trial. This act of **discrimination based on disability** also constitutes **official oppression**.

3. Brazen En-Masse Intentional Blocking and Suppression of Critical Evidence

- a. On **June 17, 2024**, prior to the final trial, Judge Wynne arbitrarily granted **Motion to Quash witnesses from Plano ISD**, which intentionally blocked the introduction of critically proven witnesses in my special needs son's favor to get relief from Judge Wynne's constant pattern of judicial misconduct.
- b. The willful and intentional suppression of my critical witnesses and evidence **before and during the jury trial**, which would have substantially helped my case, reflects a deliberate attempt by Judge Wynne to influence the outcome of the trial. This action, done with intent to harm my defense, constitutes **abuse of**

official capacity under Texas Penal Code § 39.02 and **tampering with judicial proceedings**.

4. **Tampering with Court Orders and Records and Fraud upon the Court**

- a. As mentioned previously, Judge Wynne **hurriedly, abruptly and suspiciously backdated and manually signed in wet-ink the final order and recusal order to October 16, 2024 with electronic signatures or docket entries** (*when there was no pending motion to recuse her*), signing them in **wet ink** instead of electronic signature on October 16, 2024 and delivering them to the District Clerk's office *after* I filed my **Motion to Disqualify** on **October 17, 2024** at 11:31am (Judge Wynne committed such illegal actions bypassing her own set submission deadlines/dates); all in a deliberate and intentional effort to circumvent and bypass due process and her lack of authority/jurisdiction when a Motion to Disqualify had already been filed – all the circumstantial evidence points to these facts beyond a reasonable doubt. To my notice, this is the first time in 4+ years of litigation that Judge Wynne has not used electronic signatures.
- b. The recusal order was wet-signed *after* the Motion to Disqualify was filed *when no motion for recusal was pending on October 16, 2024*, indicating that Judge Wynne was aware of her lack of authority *after* the Motion to Disqualify Judge Wynne had been filed, but *still* chose to take unauthorized actions in response. This violates the principle of impartiality and constitutes **fraud upon the court**. This constitutes clear Official Oppression under Texas Penal Code § 39.03.

- c. By manipulating official court records and **backdating the orders**, Judge Wynne **tampered with government records** in a deliberate and intentional effort to circumvent the lack of authority once my Motion to Disqualify had been filed against her on October 17, 2024 at 11:31am, which is a clear offense under **Texas Penal Code § 37.10**.

5. Criminal Misconduct in Handling Key Motions

- a. Judge Wynne denied **ALL** of my motions (**every single one of them**) and requested relief for the well-being of severely disabled special needs child including but not limited to my Motion for Emergency Temporary Orders, First Motion for continuance, Motion to compel discovery, Motion for extra time as an ADA accommodation for my severe Tinnitus and Hearing Loss, while granting the opposing party's motions, showing a clear, repeated and perpetual pattern of judicial bias, prejudice and misconduct. For instance, on **June 24, 2024**, Judge Wynne denied my **Motion for Continuance** despite the unavailability of critical witnesses (thereby blocking critical witnesses in my favor) and granted relief to the opposing party's motions. Furthermore, she denied my Motion to Compel discovery thereby placing me at a significant disadvantage by **blocking critical evidence favorable to my case** which constitutes **tampering with evidence**. Moreover, she held the pre-trial motions on June 24, 2024 just 2 days prior to Final Jury Trial thereby deliberately rushing the entire process and not giving me enough time to adequately prepare my case resulting in yet another instance of **violation of due process**.

- b. This **blatant and systemic denial of due process** by a sitting judge, while perpetually favoring the opposing party, is open **abuse of official capacity** and **official oppression** and **clear retaliation** for my **legitimate, lawful and peaceful protests** against her in the Collin County courthouse building.

6. Unlawful Seizure of My Phone

- a. On **June 24, 2024**, during the pre-trial motions, Judge Wynne arbitrarily and abruptly ordered the **seizure of my phone without a warrant** or probable cause under pretext of checking it whether I was recording the pleading, when she had already *allowed* me to use it to consult my legal notes and case law present on my phone (Pro Se litigants are afforded the same rights in court as attorneys who are allowed to use their phones in court for legal purposes). This constitutes a open and clear violation of my **Fourth Amendment rights** and a clear case of **official oppression** under **Texas Penal Code § 39.03**, as she used her position to unlawfully confiscate my property without probable cause and a warrant.

7. A Repeated Pattern of Intentional Punitive Rulings, Judicial Bias and Open Retaliation against my Protests outside the Collin County Courthouse

- a. In response to my **42-day peaceful protest outside the Collin County Courthouse in 2023**, Judge Wynne retaliated by undertaking actions and issuing rulings, including but not limited to denying 100/100 of my motions, openly manipulating/prejudicing the jury, repeated violation of due process, blocking/suppression of my critical evidence, allowing improper evidence from

opposing party, ordering **unnecessary supervised visitation** and **imposing excessive visitation fees**, all of which are punitive and retaliatory in nature and constitute official oppression and an abuse of official capacity; **placing me on supervised visitation (which is a drastic measure reserved to prevent immediate harm to children from abusive parents) almost 4 months in the future after the jury trial had concluded on June 26, 2024**; all the evidence points to these facts beyond a reasonable doubt.

- b. My parental history for my child is 100/100 in every respect (academic, health, personal/emotional development etc.) as clearly proven with undeniable clear and convincing evidence admitted throughout the pendency of the case – the admitted evidence and the mother’s own testimony has repeatedly attested these facts. These rulings, designed to punish me for exercising my **First Amendment rights of protest against her**, demonstrate **official oppression** and **abuse of power**. Such retaliatory actions undermine the judicial system and erode public trust in impartial justice. Furthermore, despite her clear and open display of bias and prejudice against me, she refused to recuse herself in response to my Motion for recusal filed on March 27, 2024; this constitutes **official oppression** under **Texas Penal Code § 39.03**. These actions have now resulted in **effective termination of my parental rights for my special needs child who shares a super-strong bond with me** – the strongest bond on the planet for both of us by an order of magnitude higher than any other relationship for my special needs child; **Judge Wynne’s actions are causing my special needs child (“M.T.A.F.”) to be in a constant state of depression and deep emotional distress as he suffers from**

severe separation anxiety disorder while being away from his father. Moreover, M.T.A.F. became suicidal and has suffered many mental health breakdowns in the last 4+ years as is clearly demonstrated from the 100+ audios/videos in my possession (many of which were introduced as evidence in court). It is important to note that, M.T.A.F. has a documented history of violence against random strangers, school staff, children and family members – *in the last 54+ months since separation of the parties in the divorce case, he has vehemently, violently and forcefully refused to transition to the mother in almost every single transition.* Additionally, M.T.A.F., a special needs child with a documented history of mental health, violence and limited mental capacities has repeatedly threatened to run away from his mother's apartment. All of this critical evidence was repeatedly, perpetually and arbitrarily ignored by Judge Wynne in complete and utter disregard of my severely disabled child's best interests.

8. Judge Wynne's Illegal Actions causing IRREPARABLE HARM to my Special Needs Child and putting him in a deep state of emotional distress.

- a. Judge Wynne's rulings over the last 4+ years have caused **irreparable harm** to my special needs child, **M.T.A.F.**, who suffers from [REDACTED], a rare chromosomal disorder. Despite the **very strong bond and dependence** my child has on me and my 100/100 parenting history, Judge Wynne's **illegal actions** have forcefully kept him away from me for long periods of time, causing him to remain in a deep state of **emotional distress** and further **worsening his mental health**, which is compounded with the fact that the mother abuses her exclusive decision

making authority to perpetually block urgently needed mental health care to him –
this has resulted in ZERO THERAPY SESSIONS, ZERO PSYCHE
MEDICATIONS, ZERO AFTER-SCHOOL ABA, ZERO IBT for M.T.A.F
**(Judge Wynne has repeatedly enabled a child abuser to block mental health
care for him despite my repeated pleas to do so)**. Now, Judge Wynne has
effectively terminated my parental rights by ordering expensive supervised
visitation despite evidence of my financial hardship that was duly admitted
during final trial which Judge Wynne intentionally ignored without any
supporting facts or evidence or case law or TRCP rules to support her ruling. I
cannot afford these illegally ordered expensive supervised visits (with no facts or
evidence to support such drastic measures) costing hundreds of dollars per visits
ordered almost four months in the future after the conclusion of the jury trial
thereby effectively resulting in a termination of my parental rights.

- b. To make matters worse for my special needs child, Judge Wynne granted the
mother **exclusive education and medical decision-making rights**, which has led
to significant neglect of my child's urgent mental health needs by the mother. The
mother has **constantly abused this exclusive medical right in the last few years
by consistently blocking necessary medical treatments, therapy, counseling
etc. including care for depression and other critical mental health issues in
addition to committing aggravated perjury on multiple counts on these
matters significantly material to this case**. Judge Wynne's intentional actions in
this regard in complete violation of the facts and the law have placed my child's

well-being at risk by enabling child abuse by the mother, further demonstrating her **official oppression** and **misuse of judicial discretion**.

III. SPECIFIC VIOLATIONS OF THE TEXAS PENAL CODE

1. Texas Penal Code § 39.03 – Official Oppression

- The **repeated violation of due process, one-sided rulings, perpetual favoritism to opposing party, unlawful seizure of my phone, repeated denial of ADA accommodations, and the retaliation for my protests and a repeated pattern of one-sided punitive and retaliatory rulings against me** ALL constitute official oppression.
- Additionally included but not limited to, **blatantly ignoring aggravated perjury, allowing improper evidence from opposing party, en-masse blocking and suppression of my critical evidence and failing to act on clear evidence of false testimony by the mother** shows intentional a **consistent pattern of judicial bias and misconduct**.

2. Texas Penal Code § 39.02 – Abuse of Official Capacity

- Judge Wynne's blocking and suppression of **critical evidence and denial of all** my motions while favoring the opposing party and granting them blanket relief reflects clear **abuse of her official judicial capacity**.

3. Texas Penal Code § 37.10 – Tampering with Government Records

- The **backdating and manual signing of the final order and recusal order** coupled with the failure to follow proper electronic filing procedures on October

16, 2024 *after* a Motion to Disqualify had been filed on October 17, 2024 thereby restricting her plenary power/jurisdiction is clear **fraud upon the court** including but not limited to **tampering with government records**.

4. **Texas Penal Code § 37.09 – Tampering with Witnesses or Evidence**

- The **suppression of key witnesses** and the **en-masse blocking of evidence in clear attempts to prejudice the jury against me** during the trial is tampering with judicial proceedings and evidence, which directly influenced the outcome of the case.

IV. CORRUPTION AND CRIMINAL CONDUCT

Judge Wynne's actions constitute **criminal misconduct, fraud upon the court and corruption by a government official**. The consistent and perpetual pattern of denying motions, ignoring aggravated perjury, en-masse suppression of my favorable evidence and openly retaliating for lawful protest shows a clear intent to subvert justice for personal gain or to harm another. Her judicial misconduct reflects a deliberate and corrupt abuse of her official position which rises to the level of official oppression and judicial corruption, as she repeatedly used her authority to obstruct my rights and protect the opposing party.

- **Manipulation of Court Records:** Backdating the final and recusal orders to obstruct my legal rights shows **criminal intent** and **tampering with court records with intent**.

- **Retaliation for Exercising Constitutional Rights:** Judge Wynne retaliated against me for peacefully protesting her rulings, which constitutes **official oppression, abuse of office and corruption.**
-

V. CONCLUSION

I respectfully request that the 416th District Court of Collin County, Texas to submit this complaint to the Collin County Texas District Attorney, the Attorney General of Texas or to a similar authority to investigate Judge Lindsey Wynne for criminal conduct, including but not limited to violations of the Texas Penal Code for official oppression, abuse of office, tampering with government records, and retaliation for lawful protest. Judge Wynne's actions demonstrate a repeated pattern of bias, criminal misconduct, and judicial corruption.

I humbly request you to help me and my special needs child.

Dated this 06th day of January, 2025.

Respectfully submitted,


TARIQ FAROOQ

(Complainant)


 X 75023

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Tariq Farooq			1/6/2025 10:14:30 PM	SENT