

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Lewis Brooks McKenzie, being duly sworn, hereby deposes and says:

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

PURPOSE OF AFFIDAVIT

1. This Affidavit is submitted in support of a Complaint against the individual named herein, and other as yet unnamed court actors and individuals; and
2. In support of each and every victim of the corrupt Dallas County judiciary, and specifically the 330th District Court, who has experienced similar abuses as outlined herein.

BACKGROUND OF AFFIANT

I am a very politically active Public Speaker in Texas who has, for years, exposed corruption in our Texas courts and with our elected officials. I also hold a Bachelor's of Science in Psychology, a Master of Arts in Clinical Psychology, and a PhD in Developmental & Experimental Psychology, along with being the former Assistant Director of Research for the TCU Institute of Child Development, and a recognized Expert in my field by the State of Texas, the Tarrant County Bar Association, courts across this State and Nation, and numerous other agencies. **Note.** AFFIANT Curriculum Vitae is attached to verify qualifications.

STATEMENT OF PURPOSE

This Affidavit is being submitted as Evidence of a Complaint against **JUDGE ANDREA D. PLUMLEE**, and that PLUMLEE knowingly and willingly caused the illegal Search and Seizure of persons and their property during an Open Court hearing on or about July 19, 2024. This unprovoked antagonism and violation of Constitutional Protections/Rights can only be viewed by an Objective Third Party of having the purpose to harass, damage, and incapacitate Mr. Bradley Miller and any supporting persons in that courtroom.

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

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

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

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

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

CONSTITUTIONAL GUIDELINES

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

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

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

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

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

U.S. Constitution, Amendment 14, Section 1: "All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of 3 1 of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

Maxim of Law: Void things are as no things.

STATUTORY GUIDELINES

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

Art. 15.04. COMPLAINT.

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

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

Art. 15.05. REQUISITES OF COMPLAINT.

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

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

*Said **COMPLAINT** (as described herein) is then Submitted to the Magistrate (or DA, etc.):*

CHAPTER 4. COURTS AND CRIMINAL JURISDICTION

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

1. The **Court of Criminal Appeals**;
2. Courts of appeals, other than the Court of Appeals for the Fifteenth Court of Appeals District;
3. The **district courts**;
4. The **criminal district courts**;
5. The magistrates appointed by the judges of the district courts of **Bexar** County, **Dallas** County, **Tarrant** County, or **Travis** County that give preference to criminal cases and the magistrates appointed by the judges of the criminal district courts of **Dallas** County or **Tarrant** County;
6. The county courts;
7. All county courts at law with criminal jurisdiction;
8. County criminal courts;
9. Justice courts;
10. Municipal courts;
11. The magistrates appointed by the judges of the district courts of **Lubbock** County;
12. The magistrates appointed by the **El Paso** Council of Judges;
13. The magistrates appointed by the **Collin** County Commissioners Court;
14. The magistrates appointed by the **Brazoria** County Commissioners Court or the local administrative judge for Brazoria County;
15. The magistrates appointed by the judges of the district

courts of **Tom Green** County;
CODE OF CRIMINAL PROCEDURE

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16. The magistrates appointed by the judges of the district
and statutory county courts of **Denton** County; and

17. The magistrates appointed by the judges of the district
and statutory county courts of **Grayson** County.

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

Art. 15.03. MAGISTRATE MAY ISSUE WARRANT OR SUMMONS.

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

1. In any case in which he is by law authorized to order verbally the arrest of an offender;

2. When any person shall make oath before the magistrate that another has committed
some offense against the laws of the State; and

3. In any case named in this Code where he is specially authorized to issue warrants of
arrest.

STATUTORY VIOLATIONS

PENAL CODE TITLE 8.

Sec. 39.02. ABUSE OF OFFICIAL CAPACITY.

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

(1) violates a law relating to the public servant's office or employment; or

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

OFFENSES AGAINST PUBLIC ADMINISTRATION, CHAPTER 39. ABUSE OF OFFICE

Sec. 39.03. OFFICIAL OPPRESSION.

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

(1) Intentionally subjects another to mistreatment or to arrest, detention, search, seizure,
dispossession, assessment, or lien that he knows is unlawful;

(2) Intentionally denies or impedes another in the exercise or enjoyment of any right,
privilege, power, or immunity, knowing his conduct is unlawful; or

(3) Intentionally subjects another to sexual harassment.

**Sec. 39.015. CONCURRENT JURISDICTION TO PROSECUTE OFFENSES UNDER THIS
CHAPTER.** With the consent of the appropriate local county or district attorney, the

attorney general has concurrent jurisdiction with that consenting local prosecutor to prosecute an offense under this chapter.

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

TEXAS CODE OF JUDICIAL CONDUCT

(As amended by the Supreme Court of Texas through September 1, 2024; Retrieved from: <https://www.txcourts.gov/media/1457109/texas-code-of-judicial-conduct.pdf>)

Canon 1: Upholding the Integrity and Independence of the Judiciary

Canon 2: Avoiding Impropriety and the Appearance of Impropriety in All of the Judge's Activities

Canon 3: Performing the Duties of Judicial Office Impartially and Diligently

Canon 4: Conducting the Judge's Extra-Judicial Activities to Minimize the Risk of Conflict with Judicial Obligations

Canon 5: Refraining from Inappropriate Political Activity

Canon 6: Compliance with the Code of Judicial Conduct

Canon 7: Effective Date of Compliance

Canon 8: Construction and Terminology of the Code

NOTE. I am not a legal professional, I am a private citizen with no legal training. Therefore, I am not responsible to outline every possible crime committed, but merely to provided enough for Probable Cause, which has been more than met with the following Statement of Facts.

STATEMENT OF LIMITED PRESENTATION OF FACTS

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

STATEMENT OF FACTS

1. My name is **Dr. L. Brooks McKenzie**, also known as Brooks. I am over the age of 18, of sound mind, and capable of making this affidavit. I have personal knowledge of the facts stated herein, which are true and correct.
2. On or about **July 19, 2024**, I attended a court hearing at the **330th** in **Dallas, Texas** presided over by Judge Andrea D. Plumlee (hereinafter known as PLUMLEE).
3. I am listed as an Expert Witness in the Cause before the 330th that day.
4. Immediately upon entering the courtroom the bailiff informed me that I would be denied access to the courtroom if I refused to surrender my phone.
5. I asked the bailiff (a) why I was being subjected to illegal search and seizure, (b) what articulable suspicion of a crime this illegal search and seizure was basing upon, and (c) who ordered the seizure of electronics without Cause.
6. The bailiff refused to answer any of my questions and refused to acknowledge Constitutional Protections and Rights that are present in our Open Texas Courts.
7. The bailiff stated that I would have to leave if I refused to surrender a cell phone.
8. The bailiff then confiscated my cell phone (along with many other court watchers) under threat of expulsion from this Open Courtroom.
9. I remained in the courtroom for approximately **two (2) hours**.
10. Upon leaving the courtroom, I received my phone back from the bailiff.

Allegations against Specific Individual / Accused

Judge who engaged in Official Oppression and Abuse of Official Capacity and other crimes:

JUDGE ANDREA D. PLUMLEE

I allege that the above-named individual, as well as any yet unnamed individuals, has **knowingly and willingly** violated the Constitutions of the United States and Texas, both Federal and State laws, and has engaged in intimidation, harassment, and illegal conduct designed to harm the public. I demand that these crimes be referred to an ***outside independent agency*** for full criminal investigation. I also demand that each Oath Holder in receipt of this **AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT** refer this named judge to the State Commission on Judicial Conduct and also referred to the State Bar of Texas, in addition to the Office of the Attorney General Criminal Division for investigation.

RELIEF

I, Dr. Brooks McKenzie, am DEMANDING a full investigation into the DALLAS County Family Courts, and specifically the corrupt 330th and its actors. I DEMAND that the Office of the Attorney General Criminal Division be contacted to head this investigation. Simple.

Please take notice that failure to respond indicates tacit acquiescence, whereby you agree to all claims herein, and this affidavit shall stand as evidence against you in all courts of

Curriculum Vitae:

Dr. Brooks McKenzie

LBH Research & Consulting, LLC, Fort Worth, Texas

2013 - Present

President

Independent Consulting & Research, Specializing in Attachment Measures and Training

- Specialize in working with agencies (e.g., non-profits, family courts, etc.) that serve at-risk children. Provide TBRI® training to organizations and families, provide Attachment assessments (AAI, AQS) of adults and children. Provide expert witness testimony, and speaking to impel change in Texas.

Grand Canyon University

2017 - 2018

Dissertation Chair

Online Dissertation Chair

- Mentor and oversee dissertation process for graduate students

DCCCD, Dallas, Texas

2014 - 2016

Adjunct Faculty

Campus and Dual-Credit Adjunct Faculty

- Adjunct Psychology Faculty

Texas Christian University, Fort Worth, Texas

2012 - 2013

Assistant Director of Research

TCU Institute of Child Development

- Administrative and collaborative oversight of all research, research staff, and training activities; TBRI® based research and training.

Texas Christian University, Fort Worth, Texas

2011 - 2012

Research Scientist

TCU Institute of Child Development

- TBRI® researcher and trainer.

Texas Christian University, Fort Worth, Texas

2006 - 2010

PhD Candidate and Teaching/Research Assistant

- PhD candidate with research and teaching load.

Dallas MetroCare, Dallas, Texas

2005 - 2006

Special-Needs Offender Program

- Case manager for high-risk offenders.

Center for Comprehensive Services, Carbondale, Illinois

2004 - 2005

Rehabilitation Specialist

- Directed psychological interventions for residents who suffered traumatic brain injury.

Education

Texas Christian University, Fort Worth, Texas

2010

Ph.D. - Experimental Psychology

Emphasis: Developmental Psychology

Expertise: Child Abuse/Neglect/Deprivation, Adult/Child Attachment

Dissertation: *Development of an Adult Attachment Scale*

Cardinal Stritch University, Milwaukee, Wisconsin

2004

M.A. in Clinical Psychology; Psi Chi Membership

Thesis: *Measures of Self-Esteem, Self-Efficacy, Locus of Control and*

Depression within the Low-Income Population in Milwaukee, Wisconsin

***9 months as Forensic Intern with Wisconsin Forensic Unit**

Southwest Texas State University, San Marcos, Texas

2001

B.S. in Psychology; Cum Laude

Major: Psychology

Minor: Philosophy

Select Publications

Purvis, K., Cross, D., Federici, R., Johnson, D., & [McKenzie](#), L. B. (2007). The Hope Connection: a therapeutic summer day camp for adopted and at-risk children with special socio-emotional needs. *Adoption & Fostering*, 31(4), 38-48.

Cross, D. R., Kellermann, G., [McKenzie](#), L. B., Purvis, K. B., Hill, G. J., & Huisman, H. G. (2010). A randomized targeted amino acid therapy with behaviourally at-risk adopted children. *Child: Care, Health and Development*, 37, 671-678.

Purvis, K. B., [McKenzie](#), L. B., Kellermann, G., & Cross, D. R. (2010). An attachment based approach to child custody evaluation: A case study. *Journal of Child Custody*, 7, 45-60.

Howard, A. R., Call, C. D., [McKenzie](#), L. B., Hurst, J. R., Cross, D. R., & Purvis, K. P. (2013). An examination of attachment representations among child welfare professionals. *Children & Youth Services Review*, 35, 1587-1591.

Purvis, K. B., [McKenzie](#), L. B., Cross, D. R., & Razuri, E. B. (2013). A spontaneous emergence of attachment behavior in at-risk children and a correlation with sensory deficits. *Journal of Child and Adolescent Psychiatric Nursing*, 26(3), 165-172.

[McKenzie](#), L. B., Purvis, K. B., & Cross, D. R. (2014). A Trust-Based Home Intervention for Special-Needs Adopted Children: A Case Study. *Journal of Aggression, Maltreatment & Trauma*, 23(6), 633-651.

Purvis, K. B., Cross, D. R., [McKenzie](#), L. B., Razuri, E. B., & Buckwalter, K. (2014). A Trust-Based Intervention for Complex Developmental Trauma: A Case Study from a

Residential Treatment Center. *Child and Adolescent Social Work Journal*, 31(4), 355-368.

Select Presentations

[McKenzie](#), L. B. & Kowalchuk, R. K. (2004). Psychological Well-Being Within a Low-Income Mid-Western Sample. Paper presented at the meeting of the International Conference for Social Science Research, New Orleans, LA.

[McKenzie](#), L. B., & Cross, D. R. (2008). Preliminary Report: Evidence Based Practices for Tarrant County. Paper presented at the Bridging the Gap Symposium, Fort Worth, Texas.

[McKenzie](#), L. B., Purvis, K. B., & Cross, D. R. (2009). Evidence Based Practices for Family Law. Paper presented at the Texas Judicial Summit, Fort Worth, Texas.

[McKenzie](#), L. B., Purvis, K. B., & Cross, D. R. (2010). Attachment and the Lifelong Effects of Disruption. Paper presented at the Texas Judicial Summit, Fort Worth, Texas.

[McKenzie](#), L. B., Purvis, K. B., & Cross, D. R. (2012). Understanding the Impact of Attachment for Family Law. Paper presented at the Texas Judicial Summit, Fort Worth, Texas.

[McKenzie](#), L. B. (2014). Attachment and Child Development. Paper presented at the Tarrant County Family Law Bar Association, Fort Worth, Texas.

[McKenzie](#), L. B. (2016). Attachment and Consequences of Global Deprivation. Paper presented at the Centers for Children & Families Conference, San Antonio, Tx.

[McKenzie](#), L. B. (2017). Attachment, Abuse, and Broken Relationships. Paper presented at the All Church Home Conference, Fort Worth, Tx.

[McKenzie](#), L. B. (2017). Custody and Child Development. Paper presented at the Tarrant County Family Law Bar Association, Fort Worth, Texas.

[McKenzie](#), L. B. (2017). Attachment and Related Outcomes for Children. Paper presented at the Centers for Children & Families Conference, Lubbock, Tx.

[McKenzie](#), L. B. (2017). Attachment and Related Outcomes for Children. Paper presented at the Centers for Children & Families Conference, San Antonio, Tx.

[McKenzie](#), L. B. (2017). Attachment, Abuse, and Broken Relationships. Paper presented at the All Church Home Conference, Fort Worth, Tx.

[McKenzie](#), L. B. (2022). Addressing the Breakdown of Our Children, Nuclear Families, and Society. Paper presented at the Young Conservatives of Texas Conference, Dallas, Tx.

[McKenzie](#), L. B. (2022). Addressing the Breakdown of Our Children, Nuclear Families, and Society. Paper presented at the Travis County True Texas Project Conference, Austin, Tx.

Unpublished Manuscripts

Cross, D. R., [McKenzie](#), L. B., Freisen-Swan, M., Nakata, T., & Purvis, K. B. (2010). *Attachment Stability and Change from 12- to 19-months: A Log-Linear Meta-analysis*. Unpublished manuscript, Texas Christian University, Fort Worth, Texas.

[McKenzie](#), L. B. (2004). *Measures of Self-Esteem, Self-Efficacy, Locus of Control and Depression within the Low-Income Population in Milwaukee, Wisconsin* (Unpublished master's thesis). Cardinal Stritch University, Milwaukee, WI.

[McKenzie](#), L. B. (2010). *Development of an Adult Attachment Scale: Preliminary Study* (Unpublished doctoral dissertation). TCU, Fort Worth, Texas.

[McKenzie](#), L. B., Cross, D. R., & Purvis, K. B. (2009). *Differences in Parental CBCL Ratings and Neurotransmitter Profiles for 30 Children: Are Differences Indicative of Dysfunction?* Unpublished manuscript, Texas Christian University, Fort Worth, Texas.

Purvis, K. B., [McKenzie](#), L. B., Rus, A. V., & Cross, D. R. (2011). *A Brief Report of Neurochemical Profiles for 28 Romanian Infants Raised in either Institutional or Biological Settings*. Unpublished manuscript, Texas Christian University, Fort Worth, Texas.

Specializations - Other

Adult Attachment Interview (AAI) - Certified (4-way) to administer and score the [Adult Attachment Interview](#) by Mary Main, PhD; scored and coded ~3000 AAI transcripts for research, non-profits, various therapeutic organizations, individuals, and child custody evaluations.

Trust-Based Relational Intervention® (TBRI®) - Extensive knowledge (10+ years) of [Trust-Based Relational Intervention®](#) (TBRI®), a program developed by the TCU Institute of Child Development (ICD). TBRI® is an attachment based intervention for children and families, designed to address the developmental needs of at-risk children.

Specialized Training / Skills- Nine months Wisconsin Forensic Unit.

Other- Serve as expert witness in child custody placement proceedings, employing Adult Attachment Interview and Attachment Q-sort (valid, reliable measures) in order to measure health of Attachment relationships. Serve as expert speaker to impel change in the broken systems within Texas.