

Fw: [External Sender]Re: Criminal Complaint

From Bradley Miller <bradley@bbmcs.com>
To Rustin Wright<rustinwright@gmail.com>, Brooks McKenzie, PhD<lbmtcu@gmail.com>
Date Thursday, October 23rd, 2025 at 4:24 PM

FYI

----- Forwarded Message -----

From: B Miller <tech@bbmcs.com>
To: Jason Fine <jason.fine@dallascounty.org>
Cc: John Creuzot <john.creuzot@dallascounty.org>
Sent: Thursday, October 23, 2025 at 04:22:14 PM CDT
Subject: Re: [External Sender]Re: Criminal Complaint

Mr. Fine:

Thanks for your reply. I did indeed take my complaint to the Dallas police headquarters. However, the detective to whom I spoke refused to even take the complaint--even though one of the accused is a Dallas Police officer.

I also submitted my complaint to the Dallas Sheriff's office. There was no response.

As you can see, the corruption pervades the entire system, including law enforcement.

And as you say, the DA's office is indeed empowered to conduct criminal investigations. And this case warrants your attention.

Sincerely,

Bradley B Miller
Pro Se
214-923-9165

P.S. I did indeed pursue a civil remedy regarding these acts. (DC-24-10372.) However, Judge Dale Tillery dismissed my suit against all defendants. So there is no possible civil remedy. (The case is now in the 5th District Court of Appeals: 05-25-00768-CV.)

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On Thursday, October 23, 2025 at 01:05:35 PM CDT, Jason Fine <jason.fine@dallascounty.org> wrote:

Mr. Miller,

The Dallas County District Attorney's Office, has reviewed your complaint. While the District Attorney's Office is empowered to conduct criminal investigations, we are primarily a prosecution agency, not a primary investigative agency. If you seek civil remedy, you may contact a civil attorney for advice. To the extent you believe criminal offenses were committed, you are encouraged to contact any applicable local law enforcement agency and request a criminal investigation. If their investigation warrants a criminal prosecution, they will forward the case to the Dallas County District Attorney's Office for further review.

Thank you

Jason Fine

Chief, Public Integrity Unit

Dallas County District Attorney's Office

From: B Miller <tech@bbmcs.com>

Sent: Thursday, October 23, 2025 12:26 AM

To: John Creuzot <John.Creuzot@dallascounty.org>

Cc: Miranda Maldonado <Miranda.Maldonado@dallascounty.org>; Valerie Obregon <Valerie.Obregon@dallascounty.org>

Subject: [External Sender]Re: Criminal Complaint

Hello, John:

I sent the email below and the attached documents to you on January 31. Could you confirm your receipt of these documents, and let me know what steps have been taken by your office in this matter since then?

Thank you for your assistance.

Regards,

Bradley B. Miller

Pro Se

214-923-9165

----- Forwarded Message -----

From: B Miller <tech@bbmcs.com>

To: John Creuzot <john.creuzot@dallascounty.org>

Cc: Kathleen Childs <kathleen.childs@dallascounty.org>

Sent: Friday, January 31, 2025 at 05:53:48 PM CST

Subject: Criminal Complaint

Hello, John:

Please see the attached documents:

-Cover Letter

-Criminal Complaint Affidavit

-Addresses of Persons named in the Complaint

I am also sending a copy of these documents to you via U.S. Mail.

Please let me know if you have any questions.

Regards,

Bradley B. Miller

Pro Se

214-923-9165

CRIMINAL COMPLAINT OF BRADLEY B. MILLER

STATE OF TEXAS	§	IN THE NAME
	§	AND BY THE AUTHORITY
COUNTY OF DALLAS	§	OF THE STATE OF TEXAS

Before me, the undersigned authority, on this day personally appeared BRADLEY BRIGGLE MILLER who stated under oath as follows:

“My name is Bradley Briggie Miller. I am above the age of eighteen years, I am a resident of Texas, and I am fully competent to make this Affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

“This formal criminal complaint arises specifically from actions and misconduct occurring within the context of Dallas County 330th Family District Court cause no. DF-13-02616, involving a series of violations under Texas State Law, Federal Statutes, and Judicial Oaths of Office. Each allegation, piece of evidence, and requested remedy presented in this document is directly tied to this case—but also extends beyond it.

“I am making this criminal complaint against **Virginia Talley Dunn**, **David H. Findley** (Texas Bar card # 24040901), **Patricia Linehan Rochelle** (Texas Bar card #13732050), **Andrea Plumlee** (District Judge of the 330th Family District Court), **Danielle Diaz** (Associate Judge of the 330th Family District Court), **Karen Warren Coleman** (former Head of the Hockaday School), **Jennifer Rhea Townzen Coats**, **Laura Leathers** (Head of the Hockaday School), **Derek R. Staub** (Texas Bar Card # 24063017), **Anthony J. Campiti** (Texas Bar card # 00798092), and Dallas Police officer **Bobby Jones** (DPD badge # 7582). All of these individuals have lived and/or worked in Dallas County, Texas since 2013. Karen Warren Coleman is now known to work at the William Penn Charter School in Philadelphia, Pennsylvania and is believed to reside in that city.

“The individuals mentioned above have been involved in a conspiratorial campaign to violate my constitutional rights that has persisted since 2013. Below is a description of just some of their illegal acts.

“On three separate occasions, I, Bradley B. Miller, have removed state court cases to federal court under 28 U.S. Code § 1443 and 28 U.S. Code § 1446, which absolutely halts the jurisdiction of the state court during the pendency of the removal. However, each time, the state court proceeded as if it had jurisdiction (when it did not), and purported ‘orders’ were issued that injured and continue to injure my constitutional rights. Several of the individuals named above were and still are involved in the commission of these crimes.

“I have complained of these violations in prior court documents. I incorporate all facts and allegations contained in my 2020 sworn federal Complaint (United States District Court for the Northern District of Texas case no. 3:20-CV-759, *Miller v. Dunn, et al.*) as if fully set forth herein. I also incorporate all facts and allegations contained in my sworn Redrafted Petition for Writ of Mandamus, filed in the Supreme Court of Texas on July 25, 2016 (SCOTX case no. 16-0487) as if fully set forth herein. I also incorporate all facts and allegations contained in my 2024 sworn federal Complaint (United States District Court for the Northern District of Texas case no. 3:24-CV-889, *Miller v. Dunn, et al.*) as if fully set forth herein. These documents are available on PACER and the SCOTX website. I also incorporate all facts and allegations contained in my 2020 sworn state Petition (Dallas County 116th Civil District Court case no. DC-20-15614, *Miller v. Dunn, et al.*) and my 2024 sworn state Petition (Dallas County 134th Civil District Court case no. DC-24-10372, *Miller v. Dunn, et al.*) as if fully set forth herein. These documents are available on the Dallas County Courts website.

Plumlee’s Void Order of November 17, 2016

“In April 2015, my ex-wife, Virginia Talley Dunn sued me, Bradley B. Miller, in the 330th Family District Court, Dallas County, Texas, for custody modification (case no. DF-13-02616). No grounds were ever cited for filing this action; I assert that Dunn filed this modification suit in retaliation for my speaking out about her unethical and criminal conduct during our divorce. Dunn requested and was granted an illegal gag order against me during the suit, and that illegal gag order remains in effect to this day.

“A bench trial was held in the 330th District Court on October 18, 2016. As far as I am aware, no reporter’s record of this trial exists, and the three-year mandatory retention period has expired under TEX. GOV’T. CODE § 52.046(a)(4). The Court reporter for the 330th Family District Court, Francheska Duffey, personally informed me that she did not have a record of this trial.

“A final order-entry hearing in this modification suit was scheduled to be held before state District Judge Andrea Plumlee at 9:00 a.m. on November 17, 2016.

“Immediately prior to the final order-entry hearing in the 330th Family District Court, I removed my state case to federal court under 28 U.S.C. § 1443, pursuant to 28 U.S.C. §§ 1446(b)(3) and 1446(d). I filed my removal petition in the United States District Court for the Northern District of Texas (‘NDTX’) at 8:27 a.m. on November 17, 2016, citing numerous constitutional violations in the 330th Family District Court. (The NDTX case number was 3:16-CV-3213.)

“I then filed a Notice of Case Removal in the 330th Family District Court at 8:55 a.m. on that same day. My state case was then legally removed to Federal Court, and the state court had no jurisdiction over the case.

“I then proceeded immediately to the door of the 330th Family Court, which is approximately 40 feet outside the 330th District Court Clerk’s Office, on the third floor of the George Allen Courthouse in Dallas. I looked through the windows in the courtroom door, but I did not see Dunn’s counsel in the courtroom. So I waited outside the courtroom door for Dunn’s attorneys to arrive.

“At 9:00 a.m. on that same day, Patricia Linehan Rochelle (counsel for Dunn, Texas Bar Card # 13732050) appeared, walking from the elevator alcove to the 330th courtroom door. When Rochelle approached, I personally handed Rochelle file-stamped copies of my federal removal petition and the state court Notice of Removal. I then informed Rochelle, ‘This case has been removed to federal court.’ Rochelle retorted, ‘I’ll tell Judge Plumlee you think you have removed the case.’ Rochelle then walked into Judge Plumlee’s courtroom. I left the premises and did not enter the courtroom.

“Later that day, Rochelle’s and Findley’s office emailed me a purported final Order In Suit To Modify Parent-Child Relationship signed by Judge Plumlee. The purported ‘Order’ is dated November 17, 2016. Plumlee had signed this purported order after the state case had been removed to federal court, and thus without jurisdiction.

“This purported ‘order’ of November 17, 2016 contains several injunctions that are violative of my constitutional rights, including prior restraint on my First Amendment rights to free speech and assembly, and infringements of my Fourteenth Amendment right to parent. The purported ‘order’ also imposed a \$25,000 legal fees levy against me and a \$15,000 levy of attorney’s fees on appeal, with interest accruing at 5% per year, compounded annually; it also imposed a requirement that I post an additional appellate bond of \$15,000 prior to any appeal, and it levied \$517.33 in court costs against me. As a direct consequence of this purported ‘order,’ I have been subject to an illegal gag order and other serious violations of my constitutional rights for more than eight years.

“The NDTX federal district court remanded my case on the next day.

“Rochelle and Dunn, in submitting a proposed order to a state judge for signing, and obtaining a signature on said order, and Judge’s Plumlee’s signing of that order—while the state court had no jurisdiction (i.e. during a federal removal)—violated Texas Penal Code § 32.46 (‘Fraudulent Securing of Document Execution’). Further, Rochelle’s and Findley’s delivery and presentation of that fraudulent ‘order’ as a legitimate court document violates Texas Penal Code § 32.48 (‘Simulating Legal Process’). Ms. Rochelle

knew that I had removed the case to Federal court—because I had personally informed her and served her with the removal pleadings—yet Rochelle decided to proceed with her criminal act anyway. The acts of Rochelle, Dunn, Findley, and Plumlee also violated Texas Penal Code § 15.02 (‘Criminal Conspiracy’), Texas Penal Code §§ 37.10(a)(2) and 37.10(a)(5) (‘Tampering With Governmental Record’), Texas Penal Code § 37.13 (‘Falsification – Record of a Fraudulent Court’), Texas Penal Code § 39.02 (‘Abuse of Official Capacity’), Texas Penal Code § 39.03 (‘Official Oppression’), 18 U.S.C. § 1349 (‘Attempt and conspiracy’), 18 U.S.C. §§ 241 and 242 (‘Conspiracy against rights’ and ‘Deprivation of rights under color of law’), and 18 U.S.C. § 4 (‘Misprision of Felony’). Because Plumlee’s fraudulent order also imposed financial levies and therefore inflicted financial harm, the act also violated 18 U.S. Code § 1341 (‘Frauds and swindles’), and 18 U.S.C. § 1343 (‘Wire Fraud’).

Diaz’s Void Order of June 7, 2018

“Dunn filed yet another groundless custody modification suit against me in the 330th Family District Court on March 8, 2018, seeking to limit my custody of our daughter. (I then filed a Petition for Bill of Review on March 29, 2018 in the 330th District Court, case no. DF-18-06546, alleging fraud and numerous rights violations—both on the part of Dunn and Judge Andrea Plumlee. Plumlee dismissed my Bill of Review.)

“A Temporary Orders hearing in Dunn’s modification suit was scheduled to be held before 330th Family District Court Associate Judge Danielle Diaz on June 7, 2018.

“Immediately prior to the Temporary Orders hearing in the 330th Family District Court, I again removed my state case to federal court under 28 U.S.C. § 1443, pursuant to 28 U.S.C. §§ 1446(b)(3) and 1446(d). I filed my removal petition in the United States District Court for the Northern District of Texas (“NDTX”) at 8:14 a.m. on June 7, 2018 (case no. 3:18-CV-1457), citing numerous constitutional violations in the 330th District Court.

“I then filed a Notice of Case Removal in the 330th Family District Court at 8:46 a.m. on that same day. Under 28 U.S. Code § 1446(d), my state case was then legally removed to Federal Court, and the state court lost all jurisdiction over the case.

“I then proceeded to the 330th Family Court Associate Judge’s courtroom on the third floor of the George Allen Courthouse in Dallas, where Diaz was scheduled to hold the Temporary Orders hearing. I entered Diaz’s courtroom at 8:57 a.m. on June 7, 2018, prior to the scheduled hearing, and walked up to David H. Findley (counsel for Dunn); I then personally handed Findley file-stamped copies of my federal removal petition and

the state court Notice of Removal. I then informed Findley, ‘This case has been removed to federal court.’ I then left the courtroom.

“Later that same day, at 11:28 a.m., Findley emailed me a copy of the purported ‘Temporary Orders’ signed by Judge Diaz. The purported “Temporary Orders” document is dated June 7, 2018, and the time is marked 9:37 a.m. in Judge Diaz’s own handwriting. In his email, Findley told me, ‘Attached please find the Temporary Orders that were entered in connection with the above-referenced case. You will need to make arrangements for Hannah’s House to set up and pay for the supervised visitation.’

“The purported (default judgment) “Temporary Orders” of June 7, 2018 contain several injunctions that are violative of my constitutional rights, including restraints on my First Amendment right to free assembly and association, and infringements of my Fourteenth Amendment right to parent. The purported ‘Temporary Orders’ bar me from custody of or access to my daughter, prohibit me from going within 1000 feet of my daughter’s school (i.e. the Hockaday School in Dallas, Texas), and enjoin me from attending my daughter’s extracurricular activities. The purported ‘Temporary Orders’ also require me to undergo a psychological evaluation, and to pay a fee to a supervised visitation center to see my own daughter—all without any stated grounds. (The visitation center, Hanna’s House in Dallas, Texas, charges a registration fee of \$60, and an hourly fee of \$60 for visitation.) As a result of these (fraudulent) injunctions, I have not had custody of or spoken to my daughter since May 2018. My relationship with my daughter and my Fourteenth Amendment parental rights are thus suffering ongoing irreparable harm.

“Dunn’s 2018 custody modification suit has now been pending in the 330th Family District Court for more than six years. Only in June of 2024 did Dunn request a trial setting. The 330th Family Court has never placed Dunn’s modification suit on its dismissal docket despite an obvious years-long want of prosecution.

“David Findley and Dunn, in submitting a proposed order to a state judge for signing, and obtaining a signature on said order, and Judge Diaz’s signing of that order—while the state court had no jurisdiction (i.e. during a federal removal)—violated Texas Penal Code § 32.46 (‘Fraudulent Securing of Document Execution’). Further, Findley’s delivery and presentation of that fraudulent “order” as a legitimate court document violates Texas Penal Code § 32.48 (‘Simulating Legal Process’). Mr. Findley knew that I had removed my case to Federal court—because I had personally informed him and served him with the removal pleadings—yet Findley decided to proceed with his criminal act anyway. Findley’s, Dunn’s, and Diaz’s acts also violated TPC § 15.02, TPC §§ 37.10(a)(2) and 37.10(a)(5), TPC § 37.13, TPC § 39.02 (‘Abuse of Official Capacity’), TPC § 39.03 (‘Official Oppression’), 18 U.S.C. § 1349, 18 U.S.C. §§ 241 and 242, and 18 U.S.C. § 4.

Because Diaz's fraudulent order also imposed financial levies and therefore inflicted financial harm, the act also violated 18 U.S. Code §§ 1341 and 1349.

"I am also aware that Findley and Dunn transmitted the purported 'Temporary Orders' to The Hockaday School. The Hockaday School—including current Head of School Laura Leathers, former Head of School Karen Warren Coleman, and for CFO Jennifer Townzen 'JT' Coats—subsequently informed me on several occasions (listed below) of the school's intent to enforce these purported 'court orders' against me and threatening to call the police if I came onto the Hockaday campus. By doing so, Leathers, Coleman, and Coats have also violated Texas Penal Code § 32.48 ('Simulating Legal Process'), TPC § 15.02, TPC §§ 37.10(a)(2) and 37.10(a)(5), TPC § 37.13, 18 U.S.C. § 1349, 18 U.S.C. §§ 241 and 242, and 18 U.S.C. § 4. Fearing arrest, I have not been to the Hockaday School since Diaz signed these purported "orders" in June 2018.

"After an unconstitutionally long 6 1/2-year delay, a trial on Dunn's 2018 custody modification suit is scheduled for February 11, 2024 before Judge Plumlee. Clearly, I have no hope of achieving due process in that proceeding when a criminal is presiding over the case.

Plumlee's Void Order of July 31, 2023

"In obvious retaliation for the filing of my 2020 federal and state civil suits against her, in which her abusive and criminal conduct was exposed, Dunn filed a Family Court petition to change our daughters last name from 'Miller' to 'Dunn' on May 24, 2022.

"On July 31, 2023, at 8:33 a.m., I filed another Section 1443 removal action in the United States District Court for the Northern District of Texas. At 8:55 a.m. on that day, I filed a Notice of Case Removal in the Dallas County 330th Family District Court (case no. DF-13-02616). A copy of the federal removal petition was attached to that state notice. (The NDTX federal district court case number is 3:23-CV-1696.)

"Trial on Virginia Talley Dunn's name change of a child suit in the state court was scheduled for 9:00 a.m. on that same day. At 8:56 a.m. on July 31, 2023, I walked to the doorway of state court District Judge Andrea Plumlee's courtroom and served attorney David H. Findley (Texas Bar card # 24040901), the attorney for Virginia Talley Dunn, with the Notice of Case Removal and the federal removal petition. I informed Mr. Findley that the state court case had been removed to federal court. This service was witnessed by Dunn, the bailiff of the 330th Family District Court, and at least one of the four Dallas County Sheriff's deputies I saw standing in the doorway of the courtroom. Mr. Findley imperiously said, 'Your removal was filed more than 30 days after the initial pleading.' I replied, 'This is not a criminal removal under Section 1455. It's a Section

1433 removal.’ Mr. Findley then entered the courtroom with Ms. Dunn. The bailiff and deputies then also entered the courtroom. I hailed the last deputy and told him that the state case had been removed to federal court, and under 28 U.S. Code Section 1446(d), the state court had no jurisdiction over the case and could not proceed. The deputy threw up his hands and said, ‘That’s above my pay grade.’ The deputy then entered Judge Andrea Plumlee’s courtroom. I then immediately left the location.

“Pursuant to 28 U.S.C. § 1446(d), the state court case was then removed (prior to trial) and can ‘proceed no further unless and until the case is remanded.’

“Later that same day, on July 31, 2023 at 11:53 a.m., Mr. Findley’s assistant, Nichi Day, emailed me a copy of the purported state court ‘Order Granting Name Change Of Child’, which was signed by 330th Family District Court Judge Andrea Plumlee. Apparently, though the state court had no jurisdiction, the (purported) trial proceeded; and, because I was not present, state-court District Judge Andrea Plumlee ruled against me and granted Dunn a default judgment. This relief purportedly changed the last name of my daughter from ‘Miller’ to ‘Dunn’. (Findley also sent me another email on July 31, 2023 at 11:43 a.m. stating that ‘the Pretrial hearing in the Modification case is set for November 15, 2023 at 8:30 a.m.’. This setting was apparently also made during the purported ‘trial,’ and thus after removal.)

“The state court ‘Order’ was signed without jurisdiction and is thus void. However, the state court proceeded as if its actions were legitimate, in clear violation of my right to Due Process under the Fourteenth Amendment, and in violation of 18 U.S.C. §§ 241 and 242.

“David Findley and Dunn, in submitting a proposed order to a state judge for signing, and obtaining a signature on said order, and Judge Plumlee’s signing of that order—while the state court had no jurisdiction (i.e. during a federal removal)—violated Texas Penal Code § 32.46 (‘Fraudulent Securing of Document Execution’). Further, Findley’s delivery and presentation of that fraudulent ‘order’ as a legitimate court document violates Texas Penal Code § 32.48 (‘Simulating Legal Process’), Texas Penal Code §§ 37.10(a)(2) and 37.10(a)(5) (‘Tampering With Governmental Record’), and Texas Penal Code § 37.13 (‘Falsification – Record of a Fraudulent Court’). Mr. Findley knew that I had removed the case to Federal court—because I had personally informed him and served him with the removal pleadings—yet Findley decided to proceed with his criminal act anyway. Findley’s, Dunn’s, and Plumlee’s acts also violated TPC § 15.02, TPC § 39.02 (‘Abuse of Official Capacity’), Texas Penal Code § 39.03 (‘Official Oppression’), 18 U.S.C. §§ 241 and 242, 18 U.S.C. § 1349, and 18 U.S.C. § 4.

The Texas Fifth District Court of Appeals Declares the name change order void.

“On January 27, 2025, the Court of Appeals for the Fifth District of Texas issued an Opinion declaring Plumlee’s purported July 31, 2024 name-change order void, and vacated the order. (See Fifth District COA case no. 05-23-00855.) Thus there is no question regarding the illegality and invalidity of Plumlee’s so-called name-change order.

Criminal Acts of Representatives of the Hockaday School

“On August 21, 2018, (then-) Hockaday Chief Financial Officer Jennifer Rhea Townzen Coats (‘JT Coats’) sent me a letter notifying me of the school’s intention to observe and enforce Judge Diaz’s fraudulent Temporary Orders of June 7, 2018. Coats wrote, ‘...you are prohibited from attending any events on the Hockaday campus or any of [your daughter’s] school-related extracurricular or social activities off campus as per the TRO.’ Coats further stated, ‘If you choose to violate School policy and the court orders through your attendance at a prohibited event, you will be asked to leave and may be given a criminal trespass warning if you refuse.’ Coats also sent me this letter via email.

“Dunn and Findley had sent Hockaday a copy of Diaz’s fraudulent June 7, 2018 Temporary Orders, falsely claiming that these orders were legitimate. Hockaday then acted on these orders as if they were issued by a legitimate court—while fully aware that they were not. Dunn, Rochelle, and Findley thus violated TPC § 32.48, and Hockaday conspired in this act by intentionally recognizing this fraudulent document as legitimate.

“On November 29, 2018, I emailed (then-) Hockaday Head of School Karen Warren Coleman and CFO JT Coats, stating that I wished to attend my daughter’s 5th Grade “Parent Pop-In Day” the next day. I cited federal cases—including *South Carolina v. Moore*, *Ackerman v. Exxon Mobil*, and *Polyplastics, Inc. v. Transconex*—which held that state-court proceedings during a federal removal are automatically void, and that a court declaration is not required to demonstrate that they are void. (I had also previously informed Hockaday of my federal case removal.) I asked Coleman and Coats to acknowledge that Diaz’s ‘temporary orders’ were void, and to assure me that, if I were to attend the event at Hockaday, that the school would not attempt to enforce Diaz’s orders.

“Later on November 29, 2018, at 4:29 p.m., Hockaday CFO JT Coats replied via email, saying, ‘We will continue with the protocols described in the August 21 letter until we receive an order rescinding the current TRO.’ Thus Hockaday stuck by its decision to recognize Judge Diaz’s fraudulent Temporary Orders as legitimate, and to thereby bar me from the Hockaday campus.

“On the afternoon of April 12, 2022, I had a phone conference with (then-) Hockaday Head of School Karen Coleman and (current Head) Laura Leathers. I again asked Coleman to clarify Hockaday’s stance on Diaz’s purported ‘Temporary Orders’ of June 7, 2018. Coleman reiterated the Hockaday intended to enforce Diaz’s purported orders, and that I was therefore not allowed on campus. I thus missed my daughter’s Eighth Grade graduation ceremony.

“On September 12, 2023, at 3:19 p.m., I emailed current Head of Hockaday School Laura Leathers, asking Leathers to clarify ‘the current status of Hockaday’s policy with regard to Danielle Diaz’s void “Temporary Orders” of June 7, 2018.’

“On September 13, 2023, at 8:22 p.m., Leathers responded by email, stating that ‘The Hockaday School will continue to abide by’ Diaz’s purported orders and that I would ‘be given a criminal trespass warning’ if I set foot on the Hockaday campus.

“By securing a false ‘court order’ and presenting it as a legitimate court document, by observing Diaz’s purported ‘Temporary Orders’, by requiring me to submit to the putative authority of these fraudulent “orders” and thereby preventing me from attending my daughter’s school activities, Dunn, Findley, Coleman, Coats, and Leathers violated Texas Penal Code § 32.48 (‘Simulating Legal Process’), Texas Penal Code §§ 37.10(a)(2) and 37.10(a)(5) (‘Tampering With Governmental Record’), Texas Penal Code § 37.13 (‘Falsification – Record of a Fraudulent Court’), Texas Penal Code § 15.02 (‘Criminal Conspiracy’), 18 U.S.C. §§ 241 and 242, 18 U.S.C. § 1349, and 18 U.S.C. § 4.

Criminal Acts of Derek R. Staub

“On June 7, 2023, Dunn’s attorney Derek R. Staub (Texas Bar Card # 24063017) emailed me (and sent via USPS mail) a letter in which he indicated that he had been hired by Dunn to pursue claims against me ‘for violations of the Temporary Restraining Order (“TRO”) executed on June 7, 2018’—obviously referencing Diaz’s purported ‘Temporary Orders’ of that date. Staub also specifically threatened my protected First Amendment speech, which he mischaracterized as ‘harassing’ Dunn. Staub also stated that ‘Dunn will seek to recover her damages and attorneys’ fees as a result of your misconduct and violations of the TRO.’ Staub clearly intended me to submit to the putative authority of Diaz’s purported ‘Temporary Orders’ of June 7, 2018—which were not only issued without jurisdiction, but which also contain injunctions violative of my constitutional rights.

“Staub also attached a copy of a 330th Family District Court ex parte ‘Temporary Restraining Order,’ signed by Andrea Plumlee on May 17, 2018. Under Texas Family Code § 83.002 this order expired ‘20 days’ after its issuance, so this order had been

defunct for five years. However, by attaching this long-expired order to his letter, and by stating that Dunn intended to seek claims against me for ‘violations’ of this order, Staub clearly intended me to submit to the putative authority of this expired order as well. (Given that Staub explicitly referred to the Temporary Orders of ‘June 7, 2018’ in his letter, it appears that Staub mistakenly attached another order; but his intent to have me submit to the June 7, 2018 ‘order’ was made clear by his language, and his intent to have me submit to the expired May 17, 2018 TRO was made clear by its attachment to Staub’s letter.)

“Staub thus violated Texas Penal Code § 32.48 (‘Simulating Legal Process’), Texas Penal Code §§ 37.10(a)(2) and 37.10(a)(5) (‘Tampering With Governmental Record’), Texas Penal Code § 37.13 (‘Falsification – Record of a Fraudulent Court’), Texas Penal Code § 15.02 (‘Criminal Conspiracy’), 18 U.S.C. §§ 241 and 242, 18 U.S.C. § 1341, 18 U.S.C. § 1343, 18 U.S.C. § 1349, and 18 U.S.C. § 4.

Criminal Acts of Anthony J. Campiti

“On February 5, 2024, attorney Anthony J. Campiti (Texas Bar card # 00798092) sent me a letter in which he stated that Hockaday ‘intends to comply with the order issued by the family court on June 7, 2018 as it relates to your permitted presence on campus,’ and that ‘the School likewise intends to comply with order issued on July 31, 2023 concerning the change of your daughter’s last name’. (Campiti’s letter was likely drafted in response to my November 3, 2023 email to Hockaday Board Chair Andrea Meshonn ‘Shonn’ Brown, who is a Defendant in my 2024 federal and state civil suits.)

“Campiti also stated that any further communications with Hockaday regarding my daughter and these purported ‘orders’ would be considered ‘harassing and abusive,’ and he demanded that I direct future communication to Campiti himself. Campiti concluded by writing that Hockaday would not remove my daughter from the advisor group of teachers Christina Goldberg and Amy Spence (who had conspired in the name change at school) as I had requested—because, as he wrote, the (void) ‘Order’ of November 17, 2016 gave Dunn sole control over ‘decisions concerning your child’s education’.

“Campiti’s letter, by conspiring to observe a fraudulent “court order” as legitimate, again constitutes a violation of three Texas criminal fraud statutes: Texas Penal Code §§ 32.48 (‘Fraud – Simulating Legal Process’), 37.10(a)(2) and 37.10(a)(5) (‘Falsification – Tampering with Governmental Record’), and 37.13 (‘Falsification – Record of a Fraudulent Court’). Conspiring with others in these acts is a crime under TPC § 15.02 and a felony under 18 U.S. Code § 241. Campiti further violated Texas Penal Code § 15.02 (‘Criminal Conspiracy’), 18 U.S.C. §§ 241 and 242, 18 U.S.C. § 1341, 18 U.S.C. § 1343, 18 U.S.C. § 1349, and 18 U.S.C. § 4.

Dunn's 2013 Burglary of Miller's Habitation

“On April 6, 2016, I was informed that, on or around November 17, 2013, Virginia Talley Dunn trespassed into my residence (my parent's home)—uninvited, unauthorized, and unbeknownst to me—and photographed my computer desk area, where my working documents from the pending divorce case were assembled and visible. Dunn thus violated TPC § 30.02 ('Burglary'). Dunn then emailed this photo to her attorneys, Patricia Rochelle and David Findley. All three thus violated TPC § 15.02 ('Conspiracy'), 18 U.S.C. § 1343, 18 U.S.C. § 1349, and 18 U.S.C. §§ 241 and 242. I was also informed that Dunn took and emailed several other digital photos of my residence on November 17, 2013; and that Dunn's nanny took other indoor photos of my residence in July 2013 and provided them to Dunn. (At no point since Dunn filed for divorce on February 13, 2013 has she been allowed into my residence. She apparently entered my residence when I was in the bathroom when she dropped off our daughter.)

“At the time, I had no way to verify if Dunn had actually taken the photos in question. But in Dunn's 2022 name change suit in the 330th Family District Court (case no. DF-13-02616), I requested any photos Dunn had taken on November 17, 2013 in my residence, and Dunn produced them in discovery—thereby verifying that she had taken them. In hearings in the 330th Family District Court on June 7, 2024 and July 19, 2024, Dunn admitted that she had been present in my residence on November 17, 2013 and that she had taken photos of my desk area. I have a copy of the court reporter's transcript of the June 7, 2024 hearing.

“The consequences of Dunn's actions were extreme. My divorce cost me approximately \$270,000 in legal fees; I lost my home, all of my assets, and all but very limited custody of my daughter. Thus Dunn's actions and the actions of Dunn's co-conspirators in that incident, Rochelle and Findley, caused me severe financial harm. I also assert that Dunn's burglary of my residence perverted the judicial process during my divorce, and thus the ruling in my divorce case was the result of fraud.”

Dunn's 2023 Harassment of Miller

“On September 26, 2023, in a related hearing in the United States District Court for the Northern District of Texas, in case number 3:23-CV-1696, Dunn's attorney Derek Staub attempted to present a photo that an unidentified person had taken of me at a St. Mark's School of Texas high school football game sometime in the preceding month. I was unaware that I was being surveilled or photographed in this public venue. Though federal Magistrate Judge David Horan did not allow Staub to present the photograph to the court, it was clear that Dunn had induced another person to follow and photograph

me, and to provide the photograph to Dunn. (I have a copy of the hearing transcript.) Dunn's actions thus violated Texas Penal Code § 42.07(a)(9)(B) ('Harassment').

"Dunn has a history of having other people stalk me. During Dunn's 2022 suit to change the name of our child, she produced a text exchange between Dunn herself and an off-duty Dallas Police officer named Bobby Jones, whom Dunn had apparently hired to follow and surveil me. I was watching my daughter play in a volleyball game on April 27, 2018 at around 5:30 p.m. at Sportsplex at [REDACTED] in Dallas. While I was there, Dunn and Jones were exchanging text messages about me; Dunn provided a description of me to Jones, who then kept me under observation and sent updates to Dunn. Their actions also violated Texas Penal Code § 42.07(a)(9)(B) and TPC § 15.02.

Dunn's 2024 Request for a Protective Order against Miller to Prevent Him From Speaking

"On May 1, 2024, Dunn filed a motion for a protective order and a request for further temporary orders in the 330th Family District Court, in case number DF-13-02616. My Family Court case had recently been remanded from the NDTX federal court after seven months, so the 330th Family Court had just regained jurisdiction. During that period—and before—I posted several updates regarding my Family Court case, the related federal removal, and Dunn's actions in connection with the ongoing court cases. All of my social media posts are protected under the First Amendment. However, Dunn clearly did not like the exposure, and she filed her motion for a protective order in a blatant act of retaliation. As grounds for her requests, she cited only my Facebook posts on my court cases. Dunn requested that the 330th Family Court grant injunctions against my speech—including a criminal jail sentence if I violated the injunctions—and the elimination of my custody of my daughter, effectively terminating my parental rights without any sort of Due Process.

"Unfortunately, the 330th Family Court has a long history of granting illegal relief at Dunn's request, and this time was no different. At a hearing on June 7, 2024 at 11:00 a.m., Judge Danielle Diaz granted Dunn's motion for a protective order and her request for further temporary orders—despite my numerous constitutional objections. Diaz also denied my 'Anti-SLAPP' motion to dismiss Dunn's requests under the Texas Citizens' Participation Act (TCPA), which is explicitly designed to stop abusive and illegal suits like Dunn's from proceeding. The protective order also bars me from possessing firearms, in clear violation of my Second Amendment rights.

"After a de novo hearing on the same issues on July 9, 2024 at 1:00 p.m., Judge Andrea Plumlee verbally largely affirmed Judge Diaz's errant rulings. The only change Plumlee made was to strike a restriction on speaking to members of the Hockaday School community, but she left the prohibition on discussing my Family Court case on social

media. I assert that Plumlee and Diaz granted the protective order to keep me from speaking in public about their own criminal acts.

Order Entry Hearing before Judge Andrea Plumlee

“After the July 9, 2024 de novo hearing, Judge Plumlee did not enter a written order recording her rulings on the protective order, the further temporary orders, my TCPA motion, or the other matters heard that day. I planned to appeal Plumlee’s denial of my TCPA motion. So, when Plumlee had not signed an order after several weeks, I filed a motion to enter orders on August 29, 2024.

“On October 7, 2024, an order-entry hearing was held before Judge Plumlee. On that day, Plumlee finally signed and entered orders affirming Diaz’s granting of Dunn’s requested protective orders and further temporary orders, and also affirming Diaz’s denial of my TCPA motion. Plumlee also entered an order affirming Diaz’s denial of my motion to dismiss Dunn’s 2018 modification suit for want of prosecution—even though the case had been pending for more than six years without any activity. Plumlee’s signed Temporary Orders also reinstated the prohibition against contacting Hockaday School staff or parents—though I am currently involved in litigation against Hockaday that requires recruiting witnesses. Thus Plumlee is violating my Fourteenth Amendment Due Process rights.

“Plumlee’s signed Final Protective Order and the Temporary Orders also bar me from from ‘posting on any social media or public platform pleadings and/or orders in connection with the case number DF-13-02616-Y’, which is a blatant violation of my First Amendment right to discuss court proceedings in a constitutionally-protected forum.

“On November 5, 2024, I filed a notice of appeal regarding Plumlee’s ruling denying my TCPA motion. On December 16, 2024, The Fifth District Court of Appeals issued a notice stating that the appeal may be untimely, since the July 9 hearing of my TCPA motion had started the clock on the appeal window—which I did not know. I was waiting for a written order to appeal. Therefore, I may not be able to appeal Plumlee’s denial of my TCPA motion. (And the Dallas Fifth District Court of Appeals also has a long history of affirming Plumlee’s illegal rulings, so any appeal is likely to be fruitless.)

“The protective order and temporary orders requested by Dunn and Findley, and granted by Diaz and Plumlee, violate Texas Penal Code § 15.02 (‘Criminal Conspiracy’), TPC § 39.02 (‘Abuse of Official Capacity’), TPC § 39.03 (‘Official Oppression’), 18 U.S.C. §§ 241 and 242, and 18 U.S.C. § 4.

“Further, I am currently suing both Judge Diaz and Judge Plumlee in state and federal civil actions, and I have filed complaints with the Texas State Commission on Judicial Conduct against both Diaz and Plumlee (SCJC case nos. 17-0094-DI and 17-0087-DI, filed on September 27, 2016 and June 19, 2017), it is clear that Diaz and Plumlee are retaliating against me for my past complaints to authorities. Their actions thus violate Texas Penal Code § 36.06(a)(1)(B) (‘Obstruction or Retaliation’) and TPC § 15.02 (‘Criminal Conspiracy’). (In my current Texas civil suit against Plumlee, 134th Civil District Court case number DC-24-10372, Judge Dale Tillery has recently dismissed my suit despite overwhelming evidence of valid claims, so there is no avenue of redress in civil court. An interlocutory appeal of Plumlee’s dismissal from that suit is pending in Texas Fifth District Court of Appeals case no. 05-24-01284-CV. Because judges protect other judges, that appeal also has zero chance of success.)

Ongoing Emotional Abuse of My Daughter

“As I mentioned, the aforementioned individuals have been engaged in an ongoing conspiracy to keep me from seeing my child; and as a result, I have had no custody of or interactions with my daughter for more than six years. My daughter is now 17 years old. Depriving a child of a parent is a well-recognized form of child psychological abuse that has numerous harmful, often permanent effects. The acts of the above-named individuals are a crime under Texas Penal Code § 22.04(a)(2) (‘Injury to a Child’), and Texas Penal Code § 15.02 (‘Criminal Conspiracy’).

Demand for Relief

“The magistrates, elected officials, and law enforcement agencies to which I am submitting this complaint must take action to prevent further harm from these deliberate and unabated criminal acts. As authorized by the Texas Code of Criminal Procedure, Article 15.03, a magistrate ‘may issue a warrant of arrest or summons when any person shall make oath before the magistrate that another has committed some offense against the laws of the State, and in any case named in this Code where he is specially authorized to issue warrants of arrest.’

“As stipulated in the Texas Code of Criminal Procedure, Article 2A.152, it is the mandatory duty of every Magistrate to ‘issue all process intended to aid in preventing and suppressing crime’ and to ‘cause the arrest of offenders using lawful means so that the offenders may be brought to punishment.’

“I, Bradley B. Miller, am DEMANDING the following Relief regarding Judges ANDREA PLUMLEE and DANIELLE DIAZ:

1. Immediate Termination of all Judicial Duties;
2. Immediate issuance of Arrest Warrant, or in the absence thereof, a formal request for the Office of the Attorney General Criminal Division to investigate ALL Dallas County District Courts and related actors, named and as yet unnamed;
3. Referral to the State Commission on Judicial Conduct and the State Bar of Texas; and
4. Public Disclosure of all Investigative Findings and Punishments assessed.

“I, Bradley B. Miller, am DEMANDING the following Relief regarding attorneys PATRICIA LINEHAN ROCHELLE, DAVID H. FINDLEY, DEREK R. STAUB, and ANTHONY J. CAMPITI:

1. Immediate Termination of Texas State Bar privileges/authorities;
2. Immediate issuance of Arrest Warrant, or in the absence thereof, a formal request for the Office of the Attorney General Criminal Division for full criminal investigation;
3. Referral to the Supreme Court of Texas and the Criminal Court of Appeals, and the State Bar of Texas; and
4. Public Disclosure of all Investigative Findings and Punishments assessed.

“I, Bradley B. Miller, am DEMANDING the following Relief regarding VIRGINIA TALLEY DUNN, KAREN WARREN COLEMAN, JENNIFER RHEA TOWNZEN COATS, AND LAURA LEATHERS:

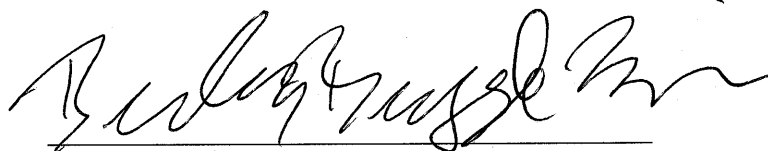
1. Immediate issuance of Arrest Warrant, or in the absence thereof, a formal request for the Office of the Attorney General Criminal Division for full criminal investigation;
2. Public Disclosure of all Investigative Findings and Punishments assessed.

“I, Bradley B. Miller, am DEMANDING the following Relief regarding BOBBY JONES:

1. Immediate Termination of all Official Duties;
2. Immediate issuance of Arrest Warrant, or in the absence thereof, a formal request for the Office of the Attorney General Criminal Division to investigate the Dallas Police Department and related actors, named and as yet unnamed;
3. Public Disclosure of all Investigative Findings and Punishments assessed.”

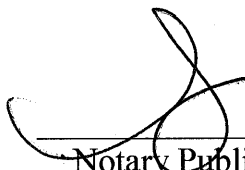
Further Affiant sayeth not.

This Complaint is brought regarding actions Against the peace and dignity of the State.

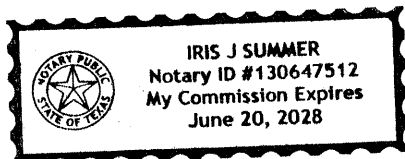


Bradley Briggle Miller

SIGNED under oath before me on January 31, 2025.



Notary Public, State of Texas



My commission expires: June 20, 2028