



Phil Sorrells
Criminal District Attorney, Tarrant County

Return to: White Collar/Public Integrity Unit
C/O Chief Lori Varnell
401 West Belknap, 9th Floor
Fort Worth, Texas 76196-0201
[REDACTED]

CRIMINAL OFFENSE INVESTIGATION REFERRAL

1. **Complainant**

Your name: JOSE PORTALATIN

Home address: [REDACTED]
Arlington street Texas apartment 76016
city state zip code

Birth date: ___/___/___ [REDACTED] [REDACTED]

Home phone: (___) _____ Work phone: (___) _____

Company you represent: _____

Company address: _____
street apartment
city state zip code

E-mail address: [REDACTED]

2. **Person and Position complained about:**

public servant
Name or names: Angie Livingston Wierzbicki and Erika Vieyra Patino, lawyer, Bar Card Number: 24074866

Home address: [REDACTED]
North Richland Hills street TX apartment 76180
city state zip code

Entity name: Court Coordinator of 233th District Court, Texas

Entity address: [REDACTED] 5th Floor
Fort Worth street, TX apartment 76196
city state zip code

Work phone: (___) _____

E-mail address: _____

3. **Names of suspect's companions and employees that have information about the offense alleged:**

Erika Vieyra Patino, lawyer, Bar Card Number: 24074866

[REDACTED] Ste A, Pantego, TX 76013-2047

4. **Offense:**

Nature of Offense: Angie(Tex. Penal Code § 36.09); Erika (36.08(e), (h) and/or § 36.02(a))
(theft, misapplication of fiduciary property, securing execution of a document by deception, etc.)

Date of Offense: 08/01/2025 City offense occurred in: Fort Worth, Texas

5. List the names of any other agencies (including police) to which you have already made a complaint in this matter, the name of the person contacted, and the date of your complaint, and the incident number of any police report:

N/A

6. **Narrative**

Please write a detailed statement of the transaction complained of. Include as many specifics as possible (for example, list the names and phone numbers of all witnesses, provide all dates, etc.) Include an explanation of your own efforts to recover your property since the transaction. **USE ADDITIONAL PAPER IF NEEDED. PLEASE ATTACH COPIES (NOT ORIGINALS) OF ANY PERTINENT DOCUMENTS.**

See attachment.

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7. List the names, addresses, and phone numbers of any individuals who know additional facts about these transactions:
See attachment.
-
-
-

Please read the following and sign the affidavit below.

- 1) The District Attorney's Office, by law, can represent only the State and only in criminal offenses. It can not represent you nor give you advice in a civil matter. Please make note that this form is not to be used generally for offenses, the District Attorney's Office is not the investigator of first report. This form is provided for referral of criminal matters of public integrity only.
- 2) The filing of this complaint can result in criminal charges being filed against the person complained of.
NOTE: INTENTIONAL MISSTATEMENT OF FACTS IN THIS COMPLAINT FORM CAN RESULT IN YOUR BEING CHARGED WITH THE OFFENSE OF "FALSE STATEMENT TO A PEACE OFFICER."
- 3) If criminal charges are filed, the disposition of the charges is the discretion of the District Attorney.
- 4) The filing of a criminal complaint does not preclude you availing yourself of civil remedies; however, please notify this office if doing so.
- 5) The District Attorney is not required to dismiss any charges upon your request. Once charges are filed, the District Attorney will only dismiss charges when it is deemed appropriate to do so. NOTE: UNDER SOME CIRCUMSTANCES, YOUR AGREEING TO DROP CHARGES CAN BE A CRIMINAL OFFENSE.
- 6) It is your responsibility to notify this office of any changes in your address or any new information obtained concerning the facts in this case.
- 7) Please return this form to the address listed at the top of page one. Include front and back copies of all the relevant documents, including checks. **DO NOT SEND YOUR ORIGINAL DOCUMENTS UNLESS SPECIFICALLY REQUESTED TO DO SO.** Keep your original documents in a safe place; they may be needed for trial.
- 8) This complaint will be reviewed by an Assistant District Attorney as soon after receipt as possible. You will be notified by mail if it is determined that criminal charges cannot be pursued. If a criminal investigation is begun, you will be notified. Please do not come to the offices of the District Attorney without first scheduling an appointment.
- 9) It normally takes 4 to 6 weeks for a response from this office on your complaint. This depends upon the workload. We process complaints in the order in which they are received. Due to the extremely lengthy time required for this office to obtain financial investigation records, some cases are under investigation for several months. No one can be certain as to how long a matter might take from start to finish.

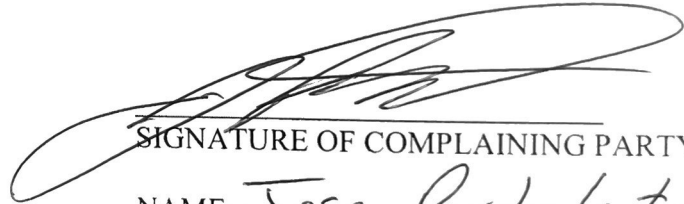
AFFIDAVIT

THE STATE OF TEXAS)

COUNTY OF TARRANT)

BEFORE ME, A Notary Public in and for the State and County aforesaid in this day personally appeared the undersigned affiant, who, after being duly sworn upon Oath deposes and says:

My name is Jose Portolatin, I have completed this form, and have read it completely. It is true, correct, and complete. If the information included in this complaint changes, I will immediately write the Criminal District Attorney's office to correct the information the Criminal District Attorney has on file in this matter. I understand that making false statements to a law enforcement officer may result in criminal penalties. Furthermore, I am willing to testify to the accusations made in this complaint, if needed. If I have further communication with the entity of which I am complaining, I will immediately write to the Criminal District Attorney's office to update/correct this complaint. I will, further, communicate any and all exculpatory information and attest that I have done so in this complain."

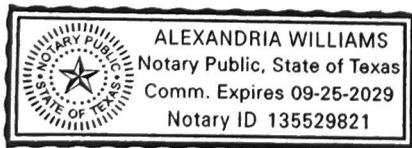


SIGNATURE OF COMPLAINING PARTY

NAME: Jose Portolatin

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public in and for Tarrant County,

Texas, this the 11th day of October, 20 25.



Alexandria Williams
NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

My Commission expires on 25th Day of September, 20 29.

It is my best knowledge and believe that following facts are true.

Offenses alleged: (1) *Offering Gift to Public Servant* — Tex. Penal Code § 36.09; (2) *Gift to Public Servant* — § 36.08(e), (h); **in the alternative** (3) *Bribery* — § 36.02(a).

Venue: Tarrant County, Texas.

A. Parties and Status

1. **Suspect 1 (private lawyer): ERIKA PATINO**, State Bar No. 24074866, whose business address is 2 [REDACTED] **Ste A, Pantego, TX 76013-2047**
2. **Suspect 2 (court employee): ANGIE LIVINGSTONE WIERZBICKI, Court Coordinator** for the **233rd District Court, Tarrant County, Texas**. A court coordinator is a **public servant** employed by a tribunal having judicial authority. See Tex. Penal Code § 1.07(a)(41); Tex. Gov't Code § 74.101.
3. **“Benefit”** means anything reasonably regarded as pecuniary gain, including a motor vehicle. Tex. Penal Code § 36.01(3).

B. Statutory Allegations

Count 1 — Offering Gift to Public Servant (Tex. Penal Code § 36.09; Class A misdemeanor).

On or about **AUGUST 1, 2025**, in Tarrant County, **ERIKA PATINO**, a person with matters pending or reasonably anticipated to be pending before the **233rd District Court**, **offered and provided** a benefit—namely a **white Volkswagen Tiguan**, year 2022-204, value **\$20,000 to 35,000+** to **ANGIE LIVINGSTONE WIERZBICKI**, a public servant employed by said tribunal, **knowing** she was prohibited by law from accepting the benefit.

Count 2 — Gift to Public Servant (Tex. Penal Code § 36.08(e), (h); Class A misdemeanor).

On or about the same date and county, **ANGIE LIVINGSTONE WIERZBICKI**, while an **employee of a tribunal exercising judicial functions**, **accepted** the above-described benefit from **ERIKA PATINO**, a person **known to be interested** in matters pending before that tribunal.

Alternative Count — Bribery (Tex. Penal Code § 36.02(a); second-degree felony).

If court hearing date setting evidence shows the vehicle was given **as consideration for** a prioritized (faster) court hearing date assigned by **ANGIE LIVINGSTONE WIERZBICKI** or other exercise of official discretion, or for a violation of an official duty by **ANGIE LIVINGSTONE WIERZBICKI**, then **ERIKA PATINO** and/or **ANGIE LIVINGSTONE WIERZBICKI** committed **Bribery** under § 36.02(a).

C. Probable-Cause Narrative

4. The **233rd District Court** is a Texas state district court seated in Tarrant County. **ANGIE LIVINGSTONE WIERZBICKI** serves as its court coordinator, performing official functions including calendaring, communications with the presiding judge, and management of court operations affecting parties with matters before the court.
5. On 5th **IN AUGUST 2025**, I observed/obtained **PHOTO/ POST** depicting **ANGIE LIVINGSTONE WIERZBICKI** in or with a **white 2022-2024 Volkswagen Tiguan**.
6. On information and belief, the Tiguan was **purchased, financed, leased, or paid for by ERIKA PATINO** (directly or through a third party) **for the use or benefit of ANGIE LIVINGSTONE WIERZBICKI**. The vehicle value is **\$20,000+ to 30,000+** based on information over internet.
7. At the time of the purchase, **ERIKA PATINO** had **matters pending** or reasonably anticipated to be pending before the **233rd District Court** during **2025**.
8. Under Tex. Penal Code § **36.08(e)**, an employee of a tribunal exercising judicial functions **may not accept** any benefit from a person known to be interested in matters before that tribunal. Under § **36.09**, it is an offense to **offer** such a benefit **knowing** the employee is prohibited from accepting it.
9. These facts establish **probable cause** that § **36.09** (by **Patino**) and § **36.08(e)** (by **Wierzbicki**) were violated and, depending on further proof of **quid pro quo**, § **36.02** (Bribery).

D. Requested Investigative Steps

Issue subpoenas/requests for:

- **Dealership** records: buyer(s), payer(s), sales contract, trade-in, financing, VIN, payment method(s), and delivery records.
 - **TxDMV** title/registration and lien data for the Tiguan.
 - **Insurance** binder and who paid the premiums.
 - **Bank/credit-card** payments linked to the purchase/lease.
 - **Communications** (texts/emails) between **Patino** and **Wierzbicki** around **July–September 2025**.
 - **Court docket** entries showing matters involving **Patino** in the **233rd District Court** during that period.
 - Any **gift/ethics disclosures** by court staff, if maintained.
11. Interview **dealership personnel** and relevant **court staff**; collect any **electronic posts** or **messages** referencing the vehicle.

E. Relief Requested

12. That this complaint be received; that an investigation be opened; and, upon determination of probable cause, that **appropriate charges** be filed for § **36.09**, § **36.08(e)**, and, if supported, § **36.02**.

Exhibit List:

- **Exh. A** — Post contains photographs of white 2022-2024 VW Tiguan.

Unsworn Declaration (Sworn Statement Under Penalty of Perjury)

[Tarrant County, Texas]

My name is Jose Portalatin, and my [REDACTED].

My address is [REDACTED] Arlington, TX 76016.

I am the declarant in the above-styled cause, and I declare under penalty of perjury that the facts stated in this document are true and correct to the best of my knowledge and belief.

Executed in Tarrant County, Texas, on this 12 day of October, 2025.

/S/Jose Portalatin

Jose Portalatin, Declarant

Pursuant to Tex. Civ. Prac. & Rem. Code § 132.001, this declaration is made in lieu of a sworn affidavit and has the same force and effect as an affidavit made under oath.

Exh A

9:35

33

29

100

Like

Comment

Share

Thompson Kimberly was tagged.



Daisy Delgado is with Angie Livingston Wi... and 2 others.

1h · 🧑🏻‍🤝‍🧑🏻

An example of true friendship and love from one friend to another friend during times of need. As usual Oprah (aka Erika) is blessing others while expecting nothing in return.

Congrats on your new car [Angie Livingston Wierzbicki!!](#)

We love you so much!! 💕💕

P.S. One of the hardest secrets to keep. We were all super duper excited 😁



Thompson Kimberly + 19

4 comments

Like

Comment

Send