

Exhibit C

Second Supplemental Criminal Complaint

Affidavit of Jose Portalatin

For Ongoing Retaliation, Harassment, Torment, and Lack of Candor

**STATE OF TEXAS
COUNTY OF TARRANT**

BEFORE ME, the undersigned authority, personally appeared **Jose Portalatin**, who, being duly sworn, deposes and states as follows:

I. Jurisdiction

This affidavit is submitted under the jurisdiction of the **State of Texas**, pursuant to **Texas Penal Code § 36.06 (Obstruction or Retaliation)**, **Texas Government Code § 81.102 (Unauthorized Practice of Law)**, and the **Texas Disciplinary Rules of Professional Conduct**. This affidavit establishes probable cause for immediate legal action and investigation into repeated and deliberate acts of retaliation, harassment, and torment.

II. Statement of Purpose

This affidavit complies with **Article 15.05 of the Texas Code of Criminal Procedure**, requiring that a complaint:

1. **Identify the Accused:** Names **James Schnurr, Amber Tilley, Karon Rowden, and Lisa Grimaldi**, and describes their misconduct.
2. **Establish an Offense:** Specifies acts constituting criminal and ethical violations under Texas law.
3. **Provide Time and Place:** Details the dates, locations, and circumstances of the alleged offenses.
4. **Affirm Under Oath:** Is signed under oath, affirming its sufficiency and truthfulness to establish probable cause.

III. Statement of Limited Presentation of Facts

This affidavit includes only the facts necessary to establish probable cause for criminal and ethical violations. It does not contain all evidence in my possession but focuses on the most relevant incidents. I have no duty to provide evidence to the accused or conduct investigations; such responsibilities rest with the authorities receiving this affidavit. This affidavit stands sufficient on its face.

IV. Complainant Information

Name: Jose Portalatin

Email: [REDACTED]

V. Respondents

1. **James Schnurr**

State Bar Qualified Law Student

Texas A&M University School of Law

2. **Amber Tilley**

Supervising Attorney, Texas Bar No. 24085082

3. **Karon Rowden**

Supervising Attorney, Texas Bar No. 24026080

4. **Lisa Grimaldi**

Court Coordinator, 325th District Court

VI. Statement of Facts

Background and Pattern of Retaliation

1. On **November 19, 2024**, I filed a formal criminal complaint detailing unethical practices, procedural violations, and retaliatory conduct by the respondents in **Cause No. 325-635708-18**.
2. Following this complaint, the respondents escalated their actions, engaging in a sustained campaign of **retaliation, harassment, and torment**, targeting me through procedural abuses, baseless motions, and deliberate misrepresentations in court filings.
3. **James Schnurr, Amber Tilley, and Karon Rowden** have each signed and filed retaliatory motions, including the **Motion to Compel Address**, which directly demonstrates their coordinated misconduct.

December 10, 2024: Bad Faith Scheduling During My Vacation

4. On **December 10, 2024**, **James Schnurr**, under the supervision of **Amber Tilley** and **Karon Rowden**, emailed the court and opposing counsel proposing hearing dates for a **1st Amended Motion to Overrule Objections** during a period he knew I was on vacation (until **December 13, 2024**). His deliberate scheduling attempt demonstrates **bad faith** and intent to gain an unfair procedural advantage.
5. Schnurr's actions disregarded the procedural stay imposed by my **Motion to Disqualify the Presiding Judge**, further escalating harassment and torment. Despite being copied on this email, neither Tilley nor Rowden intervened, allowing Schnurr to proceed unchecked, in violation of **Rule 5.01 (Responsibilities of Supervisory Lawyers)**.

January 13, 2025: Lack of Transparency and Continued Harassment

6. On **January 13, 2025**, Schnurr contacted me again to schedule hearings for a **Motion to Enforce Child Support** and an **Objection to Discovery of Bank Records**. In response, I explicitly requested clarification of Schnurr's supervising attorney and objected to his unauthorized actions.

7. Despite my request, **Amber Tilley** and **Karon Rowden**, who were copied on the email, failed to intervene or address my concerns. Their silence enabled Schnurr's unauthorized legal actions and further violated their duties under the **Texas Supreme Court's Student Practice Rule**, which mandates supervision and disclosure of authority.

January 16, 2025: Exclusion by Grimaldi and Unfair Advantage

8. On **January 16, 2025**, a hearing for **January 30, 2025**, was set by **Lisa Grimaldi**, the Court Coordinator for the 325th District Court. Grimaldi deliberately excluded me from communications regarding the available dates, while issuing them directly to opposing counsel. This omission created a significant procedural disadvantage and exemplifies ongoing harassment and bias against me.

January 30, 2025: Retaliatory Motion and Tilley's Misrepresentation

9. Following the January 16 scheduling, **Amber Tilley**, along with **James Schnurr** and **Karon Rowden**, signed and filed a **Certificate of Conference** falsely claiming that meaningful efforts had been made to consult with me and that no agreement could be reached. This statement is demonstrably false, as it relied on Schnurr's deficient January 13 email, which contained no good faith effort to confer.

10. Additionally, **Schnurr, Tilley, and Rowden** jointly filed a **Motion to Compel Address**, an unnecessary and retaliatory filing designed to harass and torment me further. This filing demonstrates a direct and intentional violation of **Texas Penal Code § 36.06 (Retaliation)**.

Systemic Impact on Future Attorneys

11. The behavior of **Amber Tilley** and **Karon Rowden** as supervising attorneys not only enabled Schnurr's unauthorized practice of law but also sets a dangerous precedent for future student attorneys. Their failure to enforce ethical standards risks corrupting future practitioners, fostering a culture of professional misconduct, and eroding public trust in the legal system.

VII. Legal Violations

1. Unauthorized Practice of Law (Texas Government Code § 81.102)

- Schnurr acted beyond his authority as a law student, engaging in legal actions without proper supervision.

2. Obstruction of Justice (Texas Penal Code § 36.06)

- Filing motions and scheduling hearings in violation of a procedural stay constitutes obstruction.

3. Retaliation (Texas Penal Code § 36.06)

- Filing retaliatory motions, including the Motion to Compel Address, to intimidate and harass me as a complainant.

4. Fraud Upon the Court

- Misrepresenting facts, including proposing hearing dates while I was unavailable, to gain an unfair advantage.
5. **Failure to Supervise (Rule 5.01)**
 - Tilley and Rowden's failure to supervise Schnurr's unauthorized actions.
 6. **Court Coordinator Misconduct**
 - Grimaldi's exclusion of me from key communications demonstrates bias and procedural unfairness.

VIII. Relief Requested

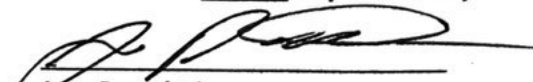
I respectfully request the following:

1. **Issuance of Arrest Warrants**
 - For all named respondents based on obstruction, retaliation, and ethical violations.
2. **Formal Criminal Investigation**
 - Conducted by the **OAG Criminal Division** or referred to **federal authorities**.
3. **Permanent Restraining Orders**
 - Prohibiting respondents from further filings or retaliatory actions until investigations conclude.
4. **Additional Relief**
 - Any other actions deemed necessary to uphold justice and accountability.

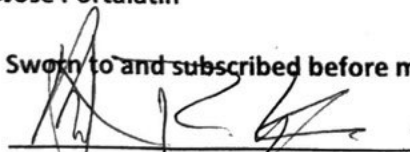
IX. Verification

I, **Jose Portalatin**, declare under penalty of perjury that the foregoing is true and correct based on my personal knowledge, the attached evidence, and relevant legal documents.

Executed this 20 day of January 2025 in Tarrant County, Texas.


Jose Portalatin

Sworn to and subscribed before me on this 20th day of January 2025.


Notary Public, State of Texas

