

325-635708-18

**Supplemental Criminal Complaint for Ongoing Corruption,
Obstruction, and Retaliation**

**Against Denise Hallmark, Andrea Padilla, Marylin Cavalie, OAG
Personnel, and Named Attorneys**

**STATE OF TEXAS
COUNTY OF TARRANT**

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

I. PARTIES

Complainant:

Jose Portalatin
[REDACTED]

Burleson, TX 76028

Email: [REDACTED]

Respondents:

1. **Denise Hallmark** – Visitation Supervisor, Tarrant County Visitation Center
2. **Andrea Padilla** – Visitation Monitor, Tarrant County Visitation Center
3. **Marylin Cavalie** – Mother of Complainant's Children
4. **Amber Tilley** – Attorney
5. **Karon Rowen** – Attorney
6. **Dana D. Clark** – Attorney
7. **Ashley Conyers** – Attorney
8. **Rebecca Eyster** – Attorney
9. **Jennifer Liles** – Attorney
10. **Erika Wheeler** – Attorney
11. **Kellet Greenwood** – Attorney

12. **John Cashman** – Attorney
13. **Cherryl Rausher** – Attorney
14. **Brian Singleterry** – Attorney
15. **James Schnurr** – Attorney
16. **OAG Child Support Division Personnel, Staff, Court Actors, and Administrators** associated with **Cause No. 325-635708-18**

II. JURISDICTION

This affidavit is filed under the authority of the following statutes:

- **Texas Penal Code § 25.03:** Interference with Child Custody
- **Texas Penal Code § 36.06:** Obstruction or Retaliation (Criminal Coercion)
- **Texas Penal Code § 22.04:** Injury to a Child
- **Texas Penal Code § 22.041:** Abandoning or Endangering a Child
- **Texas Penal Code § 38.05:** Hindering Apprehension or Prosecution
- **Texas Penal Code § 39.02:** Abuse of Official Capacity
- **Texas Penal Code § 39.03:** Official Oppression
- **Texas Penal Code § 39.015:** Concurrent Jurisdiction for Official Misconduct
- **Texas Penal Code § 37.09:** Tampering with or Fabricating Physical Evidence
- **Texas Penal Code § 71.02:** Engaging in Organized Criminal Activity
- **Texas Family Code § 153.001(a):** Parental Rights and Child Welfare

III. STATEMENT OF FACTS

1. On **June 3, 2023**, **Andrea Padilla**, acting as a visitation monitor, interrogated my daughter, [REDACTED], during supervised visitation, causing undue psychological distress.
2. On **June 17, 2023**, **Denise Hallmark** improperly influenced [REDACTED] to refuse court-ordered visitation.
3. **Critical Incident with [REDACTED] n:**
 - During a supervised visit, I hugged my son, **A [REDACTED]**
 - **Denise Hallmark** and **Andrea Padilla** abruptly **terminated the visit** and **forcibly removed Ash [REDACTED]** causing emotional harm.

- This action was a clear **abuse of authority** and not authorized by any court order.
4. **Marylin Cavalie** has knowingly placed my children with **known criminals**, endangering their physical and emotional well-being.
 5. Despite the **Notice of Criminal Activity** served on **November 19, 2024**, the listed attorneys and **OAG personnel** have continued to obstruct justice by filing motions and manipulating the court process.

IV. STATUTORY VIOLATIONS

A. Violations by Denise Hallmark, Andrea Padilla, and Marylin Cavalie

1. Texas Penal Code § 25.03 – Interference with Child Custody
2. Texas Penal Code § 36.06 – Obstruction or Retaliation (Criminal Coercion)
3. Texas Penal Code § 22.04 – Injury to a Child
4. Texas Penal Code § 22.041 – Abandoning or Endangering a Child
5. Texas Penal Code § 39.02 – Abuse of Official Capacity
6. Texas Penal Code § 39.03 – Official Oppression
7. Texas Penal Code § 38.05 – Hindering Apprehension or Prosecution

B. Violations by the Listed Attorneys and OAG Personnel

1. Texas Penal Code § 38.05 – Hindering Apprehension or Prosecution
2. Texas Penal Code § 37.09 – Tampering with or Fabricating Physical Evidence
3. Texas Penal Code § 36.06 – Obstruction or Retaliation
4. Texas Penal Code § 71.02 – Engaging in Organized Criminal Activity

V. DEMAND FOR ARREST WARRANTS

I, Jose Portalatin, hereby **demand** immediate **arrest warrants** for:

- **Denise Hallmark**
- **Andrea Padilla**
- **Marylin Cavalie**
- **Amber Tilley**

- Karon Rowen
- Dana D. Clark
- Ashley Conyers
- Rebecca Eyster
- Jennifer Liles
- Erika Wheeler
- Kellet Greenwood
- John Cashman
- Cherryl Rausher
- Brian Singleterry
- James Schnurr
- OAG Child Support Division personnel who failed to act on previous complaints.

VI. STATEMENT OF LIMITED PRESENTATION OF FACTS

*The facts presented in this affidavit are limited to those directly known and personally experienced by me, **Jose Portalatin**. This statement is made in good faith to initiate a criminal investigation. I am prepared to provide additional evidence if requested.*

VII. RELIEF REQUESTED

1. **Immediate issuance of arrest warrants** for all named individuals.
2. A **formal criminal investigation** by the **OAG Criminal Division** or referral to **federal authorities**.
3. **Permanent restraining orders** preventing any legal actions until a full investigation is completed.
4. **Immediate removal and referral for indictment** of all **OAG personnel** who failed to report the crimes.
5. Restoration of my lawful **parental rights**.

VIII. VERIFICATION

I declare under penalty of perjury that the statements in this affidavit are true and correct to the best of my knowledge.


Jose Portalatin

Executed in Tarrant County, Texas

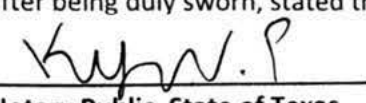
1-12-25

IX. NOTARY ACKNOWLEDGEMENT

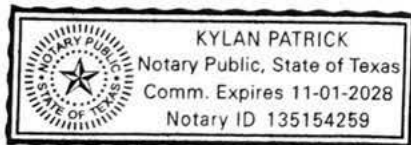
State of Texas

County of Tarrant

Before me, the undersigned authority, on this day personally appeared **Jose Portalatin**, who, after being duly sworn, stated that the contents of this affidavit are true and correct.


Notary Public, State of Texas

Commission Expires: 11/01/2028 KP(01/12/2025)



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AND RETALIATION

Status as of 1/13/2025 3:09 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Marylin Cavalie		[REDACTED]	1/12/2025 1:52:25 PM	SENT
jose portalatin		[REDACTED]	1/12/2025 1:52:25 PM	SENT
ATTORNEY GENERAL OF TEXAS		CSD-LEGAL-914@TEXASATTORNEYGENERAL.GOV	1/12/2025 1:52:25 PM	SENT
CHERYL RAUSCHER		[REDACTED]	1/12/2025 1:52:25 PM	SENT
Amber Tilley		[REDACTED]	1/12/2025 1:52:25 PM	SENT
Karon Rowden		[REDACTED]	1/12/2025 1:52:25 PM	SENT
KERRY OWENS		[REDACTED]	1/12/2025 1:52:25 PM	SENT
AMBER TILLEY		[REDACTED]	1/12/2025 1:52:25 PM	SENT
Christopher Norris		[REDACTED]	1/12/2025 1:52:25 PM	SENT
Marylin Cavalie		[REDACTED]	1/12/2025 1:52:25 PM	SENT
Brian Singleterry		[REDACTED]	1/12/2025 1:52:25 PM	SENT
BRIAN SINGLETERRY		[REDACTED]	1/12/2025 1:52:25 PM	SENT