

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Rustin Wright, 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.

1. BACKGROUND OF AFFIANT

I am a politically active Texas father with a longstanding commitment to exposing corruption within our state's judicial system and holding elected officials accountable. As a Board Member of *Texans for Judicial Accountability*, I bring over two decades of direct experience navigating the systemic failures and misconduct within the Texas Family Courts. In addition, I serve as a Precinct Chair in my county, where I work tirelessly to promote transparency, integrity, and accountability in our legal institutions. My dedication to confronting and dismantling the deeply rooted corruption within the Texas Family Courts is resolute, and I remain steadfast in my pursuit of justice until these systemic crimes are fully investigated, addressed, and corrected.

This formal criminal complaint arises specifically from actions and misconduct occurring within the context of **Lamar County CAUSE NO.: 73540** and **CAUSE NO.: 90398**, detailing 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 these two cases.

2. STATEMENT OF PURPOSE

This complaint details multiple and repeated violations of Texas State Law, Federal Statutes, and Judicial Oaths of Office, resulting in fraudulent court orders, obstruction of justice, tampering with government records, and abuse of judicial authority. These violations have profoundly undermined due process, judicial integrity, and public trust.

Scope of the Complaint:

- Clear and repeated violations of state and federal laws
- Specific statutory violations and their legal implications
- A chronological timeline of each violation
- Analysis of the harm caused by these violations
- Clear actions requested for investigation and accountability

Supporting documentation (available to investigators) includes affidavits, court orders, motions, and correspondence that substantiate each allegation.

This Verified Criminal Complaint exposes serious and sustained judicial and administrative misconduct spanning many years. The documented actions represent violations of state and federal laws, judicial oaths, and professional ethical standards, resulting in profound harm to due process, judicial integrity, and public trust.

Key Violations Identified Include:

1. Fraudulent Court Orders:
 - Court orders were knowingly issued without jurisdiction and under misrepresented legal precedent.
 - These actions compromised judicial integrity and violated procedural fairness.
2. Tampering with Government Records:
 - Official court documents were falsified, altered, or concealed to misrepresent facts and outcomes.
 - These manipulations obstructed justice and misled parties involved in the proceedings.
3. Obstruction of Legal Filings:
 - Critical legal filings were delayed, refused, or mishandled by court officials.
 - These obstructions deprived the complainant of access to procedural protections and timely justice.
4. Retaliatory Court Actions:
 - Punitive court orders were issued in response to lawful legal challenges and objections.
 - These actions imposed financial and emotional burdens while undermining judicial impartiality.
5. Failure to Follow Jurisdictional Mandates:
 - Statutory requirements for jurisdictional transfers were repeatedly ignored.
 - This failure prolonged litigation, increased costs, and exacerbated emotional distress.

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.

Note. 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.

3. 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.

4. 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 as follows:*

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.

5. 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.

6. 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.

7. STATEMENT OF FACTS

My name is **Rustin Wright** 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.

Each accused individual is presented below with their alleged violations, statutory breaches, supporting evidence, and the harm caused.

1. Will Biard - The following allegations pertain specifically to misconduct observed in **CAUSE NO.: 73540 and CAUSE NO.: 90398**, where judicial overreach, issuance of void orders without jurisdiction, and misuse of judicial authority directly undermined due process and statutory mandates.

Allegation 1: Issuing Fraudulent Court Orders Without Jurisdiction

- **Specific Action:**
 - On **June 21, 2018**, Will Biard issued a **Default Modification Order** styled under the **6th District Court**, despite presiding in the **62nd District Court** and lacking jurisdiction to issue such an order.
- **Statutes Violated:**
 - **Texas Penal Code § 37.10 – Tampering with Government Records**

- o **Texas Family Code § 155.001 – Continuing Exclusive Jurisdiction**
 - o **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
- **Explanation:**
 - o By issuing an order styled under the **wrong court**, Will Biard knowingly created a **false judicial record**, which is a violation of **Texas Penal Code § 37.10**.
 - o The issuance of this order exceeded his jurisdiction under **Texas Family Code § 155.001**, as the court no longer had continuing exclusive jurisdiction over the case.
 - o Such misuse of judicial authority constitutes **abuse of official capacity** under **Texas Penal Code § 39.02**.
 - o Additionally, issuing an order without jurisdiction while depriving a party of procedural rights violates **18 U.S.C. § 242**, which protects individuals from deprivation of rights under color of law.
- **Supporting Evidence:**
 - o **Default Modification Order (June 21, 2018)**
 - o **Affidavit Demonstrating Jurisdictional Challenge and Errors**
- **Impact:**
 - o Created **legal confusion** regarding jurisdiction.
 - o Caused **prolonged litigation** and increased legal costs for the complainant.
 - o Resulted in **emotional distress** due to uncertainty and delays.
 - o Set a **dangerous precedent** for judicial overreach and disregard for statutory boundaries.

Allegation 2: Issuing Orders After Federal Removal

- **Specific Action:**
 - o On **August 9, 2018**, the case was **removed to federal court** under **28 U.S.C. § 1446**.
 - o Despite the removal, Will Biard **continued to issue orders** without jurisdiction, in direct violation of federal law.
- **Statutes Violated:**
 - o **28 U.S.C. § 1446 – Federal Removal Statute**
 - o **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
 - o **18 U.S.C. § 1503 – Obstruction of Justice**
- **Explanation:**
 - o **Federal Removal Statute (28 U.S.C. § 1446)** explicitly strips state courts of jurisdiction once a case is removed to federal court. Any orders issued afterward are **void ab initio** (invalid from the beginning).
 - o By continuing to act in a case under federal jurisdiction, Will Biard **knowingly exceeded his authority**, violating **Texas Penal Code § 39.02**.
 - o Issuing orders without jurisdiction while depriving the complainant of procedural fairness constitutes **deprivation of rights under color of law (18 U.S.C. § 242)**.
 - o Continuing to issue orders while knowingly lacking jurisdiction obstructed federal legal processes, violating **18 U.S.C. § 1503 – Obstruction of Justice**.
- **Supporting Evidence:**
 - o **Notice of Federal Removal (August 9, 2018)**
 - o **Court Records of Orders Issued from Wrong Court**
 - o **Court Records of Orders Issued Post-Removal**
- **Impact:**
 - o The orders issued during federal removal are legally **void**, rendering them unenforceable.
 - o Prolonged the legal process, increasing **financial costs** and **emotional strain** on the complainant.

- o Created a **direct conflict with federal jurisdiction**, undermining the supremacy of federal authority.
- o Eroded **public trust in judicial integrity** by disregarding clear jurisdictional boundaries.

Allegation 3: Misuse of Nunc Pro Tunc Orders to Cover Judicial Errors

- **Specific Action:**
 - o Will Biard approved a **Judgment Nunc Pro Tunc Order** attempting to retroactively correct substantive judicial errors, instead of addressing clerical mistakes as permitted by law.
- **Statutes Violated:**
 - o **Texas Rule of Civil Procedure 329b(f) – Judgment Nunc Pro Tunc Authority**
 - o **Texas Penal Code § 37.10 – Tampering with Government Records**
 - o **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - o **18 U.S.C. § 1503 – Obstruction of Justice**
- **Explanation:**
 - o **Judgment Nunc Pro Tunc** is intended solely for **clerical errors** and cannot be used to retroactively correct judicial errors.
 - o Will Biard knowingly **misused this mechanism**, creating a **false legal record** in violation of **Texas Penal Code § 37.10**.
 - o This misuse constituted **abuse of judicial authority** under **Texas Penal Code § 39.02**.
 - o Furthermore, this act obstructed proper judicial processes, violating **18 U.S.C. § 1503**.
- **Supporting Evidence:**
 - o **Nunc Pro Tunc Order (August 2018)**
 - o **Court Transcripts Showing Intent to Misuse Nunc Pro Tunc Authority**
- **Impact:**
 - o Misrepresented the procedural history of the case.
 - o Obstructed valid legal remedies.
 - o Increased financial and emotional burdens due to false representations in the court record.
 - o Undermined the complainant's faith in the fairness of the judicial process.

Allegation 4: Retaliatory Court Actions

- **Specific Action:**
 - o Orders were issued against Rustin Wright in response to valid legal challenges and jurisdictional objections.
- **Statutes Violated:**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
 - o **Texas Penal Code § 36.06 – Obstruction or Retaliation**
- **Explanation:**
 - o Retaliatory legal actions constitute **abuse of power and obstruction of justice**.
 - o Issuing punitive orders to discourage lawful challenges violates **18 U.S.C. § 242**.
 - o Retaliation against a party engaging in lawful legal processes violates **Texas Penal Code § 36.06**.
- **Supporting Evidence:**
 - o **Court Orders Demonstrating Retaliation**
 - o **Affidavit and [Video Evidence](#) Detailing Retaliatory Actions**
- **Impact:**
 - o Created an environment of intimidation.
 - o Imposed additional financial burdens through unjust legal mandates.

- o Caused prolonged emotional distress and procedural unfairness.

Summary of Will Biard's Alleged Violations

1. **Fraudulent Court Orders Without Jurisdiction**
2. **Issuing Orders Post-Federal Removal**
3. **Misuse of Nunc Pro Tunc Mechanisms**
4. **Retaliatory Court Actions**

Statutes Violated:

- **Texas Penal Code § 37.10, § 39.02, § 36.06**
- **Texas Family Code § 155.001**
- **28 U.S.C. § 1446**
- **18 U.S.C. § 1503, § 242**

Impact:

- Financial and emotional harm
- Legal confusion and prolonged litigation
- Systemic erosion of public trust in judicial institutions

2. District Clerk Shawntel Golden - The following allegations pertain specifically to misconduct observed in **CAUSE NO.: 73540** and **CAUSE NO.: 90398**, where administrative failures, obstruction of valid legal filings, and deliberate delays caused severe procedural injustice and prolonged litigation.

Allegation 1: Obstruction of Legal Filings

- **Specific Action:**
 - o From **2018 to 2024**, District Clerk Shawntel Golden **systematically delayed, refused, and mishandled legal filings** submitted by Rustin Wright.
 - o Critical motions, pleadings, and other essential court documents were either **intentionally misplaced, delayed without cause, or improperly filed**, causing significant procedural delays and obstruction of justice.
- **Statutes Violated:**
 - o **18 U.S.C. § 1512 – Obstruction of Judicial Proceedings**
 - o **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - o **Texas Penal Code § 37.10 – Tampering with Government Records**
 - o **42 U.S.C. § 1983 – Deprivation of Rights Under Color of Law**
- **Explanation:**
 - o **Obstruction of Judicial Proceedings (§ 1512):** Any intentional action to obstruct, delay, or prevent the lawful processing of court documents constitutes obstruction of judicial proceedings.
 - o **Abuse of Official Capacity (§ 39.02):** As a public official, Shawntel Golden misused her position to intentionally prevent the proper handling of official court documents.
 - o **Tampering with Government Records (§ 37.10):** By intentionally mishandling or misplacing court filings, Shawntel Golden falsified the official court record.
 - o **Deprivation of Rights (§ 1983):** By obstructing valid legal filings, she deprived Rustin Wright of access to the courts and procedural due process guaranteed under both state and federal law.

- **Supporting Evidence:**
 - Exhibits Showing Procedural Obstructions by District Clerk
 - Affidavits and [Video Evidence](#) Detailing Refusals to File Legal Motions
 - Timestamped Communication Logs Showing Delays
- **Impact:**
 - **Delayed hearings and case resolution**, causing prolonged litigation.
 - **Increased financial burdens** due to repeated legal efforts to rectify mishandled filings.
 - **Severe emotional distress** caused by persistent obstruction and procedural injustice.
 - **Erosion of trust in judicial institutions** due to the misuse of public office.

Allegation 2: Refusal to Accept Critical Jurisdictional Motions

- **Specific Action:**
 - District Clerk Shawntel Golden **refused to process motions challenging jurisdiction** filed by Rustin Wright.
 - Key jurisdictional objections and motions for transfer were either ignored or intentionally mishandled.
- **Statutes Violated:**
 - **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - **Texas Penal Code § 36.06 – Obstruction or Retaliation**
 - **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
- **Explanation:**
 - **Abuse of Official Capacity (§ 39.02):** Golden knowingly misused her official capacity to obstruct valid legal filings.
 - **Obstruction or Retaliation (§ 36.06):** The repeated refusal to file valid motions indicates retaliatory intent against lawful legal challenges.
 - **Deprivation of Rights (§ 242):** Preventing jurisdictional motions from being filed deprived Rustin Wright of his constitutional right to challenge jurisdiction in a fair and timely manner.
- **Supporting Evidence:**
 - **Correspondence Documenting Filings Rejected Without Cause**
 - **Affidavits Detailing Attempts to File Jurisdictional Motions**
 - **Logs Showing Filing Refusals Without Explanation**
- **Impact:**
 - Jurisdictional objections were **never properly considered**, leading to **void orders** being enforced.
 - **Significant delays** in resolving procedural disputes.
 - Financial losses due to repeated attempts to refile motions.
 - Emotional stress caused by systemic obstruction.

Allegation 3: Falsification of Filing Records

- **Specific Action:**
 - Shawntel Golden **falsified filing dates** on certain motions submitted by Rustin Wright.
 - Some documents were marked as filed on dates that did not match the submission timestamps, while others were filed out of sequence to obscure procedural timelines.
- **Statutes Violated:**
 - **Texas Penal Code § 37.10 – Tampering with Government Records**
 - **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - **18 U.S.C. § 1512 – Obstruction of Judicial Proceedings**

- **Explanation:**
 - **Tampering with Government Records (§ 37.10):** Intentionally altering official filing dates constitutes falsification of public records.
 - **Abuse of Official Capacity (§ 39.02):** Misusing authority to manipulate official court filings is a clear violation of public trust.
 - **Obstruction of Judicial Proceedings (§ 1512):** Falsifying records directly obstructed the judicial process.
- **Supporting Evidence:**
 - **Documented Filing Logs with Inconsistencies in Dates**
 - **Affidavit Detailing Falsified Records**
 - **Court Correspondence Addressing Filing Inconsistencies**
- **Impact:**
 - Created **false procedural timelines**, obstructing the clarity and integrity of court records.
 - Delayed hearings and impeded the proper review of motions.
 - Further increased **financial and emotional strain** on Rustin Wright.
 - Undermined public confidence in the impartial administration of justice.

Allegation 4: Retaliatory Conduct Against Valid Legal Challenges

- **Specific Action:**
 - Evidence suggests that Shawntel Golden engaged in **retaliatory conduct**, obstructing legal filings and delaying the processing of valid motions in response to jurisdictional and procedural challenges filed by Rustin Wright.
- **Statutes Violated:**
 - **Texas Penal Code § 36.06 – Obstruction or Retaliation**
 - **42 U.S.C. § 1983 – Deprivation of Rights Under Color of Law**
- **Explanation:**
 - **Obstruction or Retaliation (§ 36.06):** Retaliation against an individual for exercising lawful rights, including filing valid legal challenges, is explicitly prohibited.
 - **Deprivation of Rights (§ 1983):** Retaliatory actions violate the complainant's constitutional right to access justice without intimidation or obstruction.
- **Supporting Evidence:**
 - **Court Records Demonstrating Patterns of Obstruction After Filings**
 - **Affidavit Detailing Retaliatory Conduct**
 - **Email Correspondence Indicating Obstructive Behavior**
- **Impact:**
 - Created an **intimidating environment** that discouraged valid legal challenges.
 - Financial costs due to repeated attempts to address retaliation.
 - Emotional distress caused by systemic retaliation.

Summary of District Clerk Shawntel Golden's Alleged Violations

1. **Obstruction of Legal Filings**
2. **Refusal to Process Jurisdictional Motions**
3. **Falsification of Filing Records**
4. **Retaliatory Conduct**

Statutes Violated:

- **18 U.S.C. § 1512, § 242**

- **Texas Penal Code § 39.02, § 37.10, § 36.06**
- **42 U.S.C. § 1983**

Impact:

- **Severe delays** in case resolution.
- **Financial harm** due to repeated legal efforts.
- **Emotional distress** caused by systemic obstruction.
- **Erosion of public trust** in judicial administration.

3. F. Duncan Thomas - The following allegations pertain specifically to misconduct observed in CAUSE NO.: 73540 and CAUSE NO.: 90398, where improper judicial rulings, abuse of authority, misuse of nunc pro tunc orders, and retaliatory actions undermined due process rights and procedural fairness.

Allegation 1: Abuse of Judicial Authority and Deprivation of Rights Under Color of Law

- **Specific Action:**
 - o F. Duncan Thomas **issued orders without jurisdiction**, despite clear statutory and procedural challenges questioning the court's authority.
 - o He **refused to enforce discovery obligations**, preventing the complainant from obtaining critical evidence necessary for a fair hearing.
 - o F. Duncan Thomas issued a **Nunc Pro Tunc Order without notice**, exceeding the procedural limitations of such orders and violating the complainant's due process rights.
- **Statutes Violated:**
 - o **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - o **Texas Penal Code § 37.10 – Tampering with Government Records**
 - o **Texas Family Code § 155.001 – Continuing Exclusive Jurisdiction**
 - o **Texas Rule of Civil Procedure 329b(f) – Nunc Pro Tunc Authority**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
 - o **18 U.S.C. § 1503 – Obstruction of Justice**
- **Explanation:**
 - o **Abuse of Official Capacity (§ 39.02):** F. Duncan Thomas knowingly misused his judicial authority by issuing orders without proper jurisdiction and failing to enforce procedural obligations.
 - o **Tampering with Government Records (§ 37.10):** Issuing an invalid **Nunc Pro Tunc Order** created a false judicial record, misrepresenting procedural history.
 - o **Continuing Exclusive Jurisdiction (§ 155.001):** He acted in a matter where the court had lost or failed to properly establish jurisdiction.
 - o **Nunc Pro Tunc Authority (Rule 329b(f)):** A Nunc Pro Tunc Order can only correct **clerical errors, not judicial errors**. Using this order for substantive corrections constitutes judicial misconduct.
 - o **Deprivation of Rights Under Color of Law (§ 242):** Issuing orders outside jurisdiction and refusing discovery obligations deprived the complainant of procedural due process protections under the U.S. Constitution.
 - o **Obstruction of Justice (§ 1503):** These actions collectively obstructed the fair and just resolution of the case, creating unnecessary procedural hurdles.
- **Supporting Evidence:**
 - o **Exhibits Showing Misuse of Nunc Pro Tunc Orders**
 - o **Court Records Documenting Jurisdictional Challenges Ignored**

- o **Affidavit Detailing Refused Discovery Requests**
 - o **Court Transcripts Highlighting Procedural Misconduct**
- **Impact:**
 - o **Violation of constitutional rights**, including the right to procedural fairness and due process.
 - o **Financial burdens** caused by prolonged litigation and unnecessary legal expenses.
 - o **Obstruction of evidence collection**, directly affecting the complainant's ability to present a proper legal case.
 - o **Emotional distress** caused by repeated judicial overreach and disregard for statutory obligations.
 - o **Erosion of confidence in judicial impartiality**, as procedural safeguards were systematically ignored.

Allegation 2: Misuse of Nunc Pro Tunc Orders to Cover Jurisdictional Deficiencies

- **Specific Action:**
 - o F. Duncan Thomas issued a **Nunc Pro Tunc Order** to correct substantive judicial errors rather than clerical mistakes.
 - o The order was issued **without notice**, depriving the complainant of the right to contest or respond.
- **Statutes Violated:**
 - o **Texas Rule of Civil Procedure 329b(f) – Judgment Nunc Pro Tunc Authority**
 - o **Texas Penal Code § 37.10 – Tampering with Government Records**
 - o **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
- **Explanation:**
 - o **Improper Use of Nunc Pro Tunc Authority (Rule 329b(f)):** A Nunc Pro Tunc Order cannot be used to correct **judicial mistakes or omissions**, only clerical errors.
 - o **Tampering with Government Records (§ 37.10):** Misrepresenting a judicial error as a clerical one in an official court order falsifies a government record.
 - o **Abuse of Official Capacity (§ 39.02):** Misusing judicial tools to retroactively justify invalid orders constitutes abuse of power.
 - o **Deprivation of Rights (§ 242):** Conducted an unlawful hearing without ensuring proper service, resulting in the issuance of an invalid order that violated the complainant's constitutional right to due process, depriving them of a fair opportunity to be heard and defend their legal position.
- **Supporting Evidence:**
 - o **Nunc Pro Tunc Order (August 2018)**
 - o **Affidavit Detailing Lack of Hearing Notice**
 - o **Correspondence Highlighting Procedural Violations**
- **Impact:**
 - o Created a **false judicial record** misrepresenting procedural action.
 - o Obstructed the complainant's ability to **challenge procedural errors** effectively.
 - o **Prolonged litigation and increased financial costs** for the complainant.
 - o Caused **significant emotional distress** due to repeated judicial overreach.

Allegation 3: Retaliatory Orders Against Valid Legal Challenges

- **Specific Action:**

- o F. Duncan Thomas issued **punitive and retaliatory orders** in response to jurisdictional and procedural challenges filed by Rustin Wright.
- o These orders were issued without merit and appeared intended to discourage further legal objections.
- **Statutes Violated:**
 - o **Texas Penal Code § 36.06 – Obstruction or Retaliation**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
 - o **42 U.S.C. § 1983 – Civil Rights Violation**
- **Explanation:**
 - o **Obstruction or Retaliation (§ 36.06):** Issuing punitive orders against valid legal objections constitutes obstruction and retaliation under Texas law.
 - o **Deprivation of Rights (§ 242):** Retaliatory orders deprived the complainant of fair judicial treatment.
 - o **Civil Rights Violation (§ 1983):** Judicial retaliation against lawful legal challenges violates constitutional protections.
- **Supporting Evidence:**
 - o **Court Orders Demonstrating Retaliatory Nature**
 - o **Affidavit Detailing Pattern of Retaliation**
 - o **Court Transcripts Showing Retaliatory Language**
- **Impact:**
 - o Created an **environment of intimidation**, discouraging further lawful objections.
 - o Increased **financial and emotional burdens** through punitive directives.
 - o Undermined **confidence in judicial impartiality and fairness**.

Summary of F. Duncan Thomas's Alleged Violations

1. **Abuse of Judicial Authority**
2. **Issuing Orders Without Jurisdiction**
3. **Misuse of Nunc Pro Tunc Orders**
4. **Retaliatory Court Actions**

Statutes Violated:

- **Texas Penal Code § 39.02, § 37.10, § 36.06**
- **Texas Family Code § 155.001**
- **Texas Rule of Civil Procedure 329b(f)**
- **18 U.S.C. § 242, § 1503**
- **42 U.S.C. § 1983**

Impact:

- **Severe delays** in case resolution.
- **Increased financial burdens** due to prolonged litigation.
- **Obstruction of evidence collection**, affecting the complainant's legal strategy.
- **Significant emotional distress** caused by systemic misconduct.
- **Erosion of public trust in judicial fairness and impartiality**.

4. **Attorney Stephen Lawrence** - The following allegations pertain specifically to misconduct observed in CAUSE NO.: 73540 and CAUSE NO.: 90398, where false legal representations, misapplication of

legal precedents, and active participation in void judicial orders obstructed justice and violated statutory mandates.

Allegation 1: Fraudulent Misrepresentation to the Court

- **Specific Action:**
 - He **falsely asserted** that Knox v. Long provided legal precedent for treating the **designation of the issuing court** as a **clerical error** that could be retroactively corrected through a nunc pro tunc order.
 - **The court designation is a substantive judicial error, not a clerical mistake, and cannot legally be corrected via a nunc pro tunc order.**
 - This **misrepresentation of case law** misled the court into **issuing an order outside its jurisdictional authority**, violating **established legal standards**, and **compromising the integrity of the judicial process**.
- **Statutes Violated:**
 - **18 U.S.C. § 1503 – Obstruction of Justice**
 - **Texas Penal Code § 37.10 – Tampering with Government Records**
 - **Texas Penal Code § 32.46 – Securing Execution of Document by Deception**
 - **Texas Disciplinary Rules of Professional Conduct Rule 3.03 – Candor Toward the Tribunal**
- **Explanation:**
 - **Obstruction of Justice (§ 1503):** Misrepresenting case law to mislead a judge into issuing an improper order constitutes obstruction of justice by interfering with the court's lawful operations.
 - **Tampering with Government Records (§ 37.10):** By misrepresenting precedent in the context of a court order, Stephen Lawrence contributed to the creation of a **false judicial record**.
 - **Securing Execution of Document by Deception (§ 32.46):** Lawrence knowingly presented false legal arguments to secure a ruling favorable to his client, using deception to manipulate judicial outcomes.
 - **Candor Toward the Tribunal (Rule 3.03):** Attorneys have an ethical obligation to **not knowingly make false statements of law** to a tribunal. Violating this rule is professional misconduct.
- **Supporting Evidence:**
 - **Exhibits Showing Further Nunc Pro Tunc Misuse**
 - **Court Transcripts Documenting Misrepresentation of Knox v. Long**
 - **Affidavits from Court Observers**
- **Impact:**
 - Influenced **judicial decisions through false legal arguments**.
 - Created **false judicial records** based on misrepresented legal precedent.
 - Caused **significant delays and confusion** in resolving jurisdictional issues.
 - **Eroded judicial integrity** and trust in the fairness of court proceedings.

Allegation 2: Participation in the Issuance of Void Orders

- **Specific Action:**
 - Attorney Stephen Lawrence actively **participated in drafting and advocating for void court orders** issued without jurisdiction.
 - He continued to advocate for these orders even after clear evidence demonstrated their invalidity under state and federal laws.

- **Statutes Violated:**
 - **Texas Penal Code § 37.10 – Tampering with Government Records**
 - **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
 - **42 U.S.C. § 1983 – Civil Rights Violation**
 - **Texas Penal Code § 39.02 – Abuse of Official Capacity**
- **Explanation:**
 - **Tampering with Government Records (§ 37.10):** Supporting and advocating for void judicial orders knowingly contributed to the falsification of government records.
 - **Deprivation of Rights (§ 242):** By enabling the issuance of void orders, Lawrence deprived the complainant of procedural fairness and constitutional protections.
 - **Civil Rights Violation (§ 1983):** Advocating for unlawful orders that undermine due process constitutes a civil rights violation.
 - **Abuse of Official Capacity (§ 39.02):** Using his professional position to further invalid judicial actions represents a misuse of official capacity.
- **Supporting Evidence:**
 - **Court Orders Demonstrated to be Void Ab Initio**
 - **Transcripts of Proceedings Showing Lawrence’s Advocacy for Void Orders**
 - **Affidavits Documenting Procedural Irregularities**
- **Impact:**
 - Prolonged litigation through reliance on **void and unenforceable orders**.
 - Increased **financial burdens** on the complainant due to repeated legal challenges.
 - Undermined **faith in judicial and legal accountability**.
 - Created **systemic confusion** regarding jurisdictional clarity and procedural fairness.

Allegation 3: Suppression of Material Evidence

- **Specific Action:**
 - Attorney Stephen Lawrence intentionally **withheld and suppressed material evidence** relevant to jurisdictional challenges and discovery obligations.
 - He failed to produce requested evidence that was critical to the complainant's ability to challenge void orders effectively.
- **Statutes Violated:**
 - **Texas Penal Code § 37.09 – Tampering with or Fabricating Physical Evidence**
 - **18 U.S.C. § 1503 – Obstruction of Justice**
 - **Texas Disciplinary Rules of Professional Conduct Rule 3.04 – Fairness to Opposing Party and Counsel**
- **Explanation:**
 - **Tampering with Evidence (§ 37.09):** Suppressing evidence necessary for legal proceedings obstructs the discovery process.
 - **Obstruction of Justice (§ 1503):** Intentionally withholding evidence constitutes a direct effort to obstruct the lawful functioning of the court.
 - **Fairness to Opposing Party (Rule 3.04):** Failing to disclose evidence violates the attorney's obligation to ensure fairness in the legal process.
- **Supporting Evidence:**
 - **Discovery Requests Documenting Withheld Evidence**
 - **Affidavits Detailing Suppression of Evidence**
 - **Correspondence Highlighting Non-Compliance with Discovery Requests**
- **Impact:**
 - Denied the complainant access to **critical evidence necessary for fair proceedings**.
 - Prolonged litigation and increased financial strain due to repeated motions to compel evidence.

- o Obstructed the complainant's ability to **assert valid jurisdictional challenges**.

Summary of Attorney Stephen Lawrence's Alleged Violations

1. **Fraudulent Misrepresentation to the Court**
2. **Participation in the Issuance of Void Orders**
3. **Suppression of Material Evidence**

Statutes Violated:

- **18 U.S.C. § 1503 – Obstruction of Justice**
- **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
- **42 U.S.C. § 1983 – Civil Rights Violation**
- **Texas Penal Code § 37.10, § 32.46, § 39.02, § 37.09**
- **Texas Disciplinary Rules of Professional Conduct Rule 3.03, Rule 3.04**

Impact:

- **Influenced judicial decisions** through false arguments.
- Created **false and void judicial records**.
- Prolonged litigation through reliance on **invalid orders**.
- **Suppressed critical evidence**, obstructing procedural fairness.
- **Undermined public confidence** in the fairness and impartiality of judicial proceedings.

5. **Attorney Jennifer Gibo** - The following allegations pertain specifically to misconduct observed in CAUSE NO.: 73540, where facilitation of void judicial orders, suppression of evidence, and deliberate misrepresentation of legal precedents directly harmed procedural integrity and obstructed the administration of justice.

Allegation 1: Participation in the Issuance of Fraudulent and Void Orders

- **Specific Action:**
 - o Attorney Jennifer Gibo actively **facilitated the drafting, filing, and enforcement of void court orders**, including orders issued **without jurisdiction** and **nunc pro tunc orders** improperly used to alter substantive judicial rulings.
 - o She **knowingly supported these unlawful actions** by providing legal arguments to justify these void orders and continued to advocate for their enforcement despite knowing their invalidity.
- **Statutes Violated:**
 - o **Texas Penal Code § 37.10 – Tampering with Government Records**
 - o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception**
 - o **Texas Penal Code § 39.02 – Abuse of Official Capacity**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law**
 - o **18 U.S.C. § 1503 – Obstruction of Justice**
 - o **Texas Disciplinary Rules of Professional Conduct Rule 3.03 – Candor Toward the Tribunal**
- **Explanation:**
 - o **Tampering with Government Records (§ 37.10):** By advocating for and enabling the issuance of void judicial orders, Jennifer Gibo contributed to the creation and validation of **false legal records**.

- o **Securing Execution of Document by Deception (§ 32.46):** Gibo knowingly used **deceptive legal arguments** to influence the court into issuing orders that were procedurally and substantively void.
 - o **Abuse of Official Capacity (§ 39.02):** Misusing her position as an officer of the court, Gibo facilitated judicial actions that exceeded statutory authority.
 - o **Deprivation of Rights Under Color of Law (§ 242):** By supporting judicial actions that deprived the complainant of procedural fairness and due process, she contributed to the violation of constitutional rights.
 - o **Obstruction of Justice (§ 1503):** Her actions obstructed the fair and impartial administration of justice.
 - o **Candor Toward the Tribunal (Rule 3.03):** Gibo violated her duty as an officer of the court by **knowingly presenting false arguments** and failing to correct misleading representations to the tribunal.
- **Supporting Evidence:**
 - o **Exhibits Showing Misuse of Nunc Pro Tunc Orders**
 - o **Court Transcripts Documenting Gibo's Advocacy for Void Orders**
 - o **Affidavits Highlighting Misrepresentations Made in Court**
 - o **Correspondence Demonstrating Knowledge of Jurisdictional Issues**
- **Impact:**
 - o **Created false judicial records** that misrepresented the procedural history of the case.
 - o Prolonged litigation by **defending and advocating for void orders.**
 - o Caused **financial burdens** due to unnecessary legal motions and appeals.
 - o Undermined **procedural integrity and public trust in the legal system.**
 - o Denied the complainant the **right to fair judicial consideration.**

Allegation 2: Misrepresentation of Legal Precedent in Advocacy

- **Specific Action:**
 - o Attorney Jennifer Gibo **misrepresented case law and statutory authority** in oral arguments and written motions to support void judicial actions.
 - o She selectively cited legal precedents in a manner that distorted their true meaning and intent, creating false justifications for unlawful court orders.
- **Statutes Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice**
 - o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception**
 - o **Texas Disciplinary Rules of Professional Conduct Rule 3.03 – Candor Toward the Tribunal**
- **Explanation:**
 - o **Obstruction of Justice (§ 1503):** Misrepresenting precedent constitutes an intentional effort to mislead the judiciary, obstructing lawful judicial proceedings.
 - o **Securing Execution of Document by Deception (§ 32.46):** Misusing legal precedent to secure favorable but unlawful court orders constitutes deceptive legal practice.
 - o **Candor Toward the Tribunal (Rule 3.03):** Misrepresenting established legal precedents violates an attorney's ethical duty to present truthful arguments to the court.
- **Supporting Evidence:**
 - o **Court Transcripts Documenting Misrepresentation of Precedent**
 - o **Legal Briefs Filed by Attorney Gibo Demonstrating Misuse of Precedent**
 - o **Affidavits Highlighting Misleading Legal Arguments**
- **Impact:**
 - o Influenced judicial outcomes through **false legal arguments.**
 - o Prolonged litigation by embedding **procedural errors into court rulings.**

- o Caused **legal confusion and unnecessary motions** to address misrepresented precedents.
- o **Undermined judicial decision-making integrity** by introducing false legal claims.

Allegation 3: Suppression and Misuse of Evidence

- **Specific Action:**
 - o Attorney Jennifer Gibo **intentionally suppressed critical evidence** and **misrepresented the contents of discovery materials** in order to obstruct valid legal challenges filed by the complainant.
 - o She selectively presented evidence while omitting material facts that would have invalidated certain court rulings.
- **Statutes Violated:**
 - o **Texas Penal Code § 37.09 – Tampering with or Fabricating Physical Evidence**
 - o **18 U.S.C. § 1503 – Obstruction of Justice**
 - o **Texas Disciplinary Rules of Professional Conduct Rule 3.04 – Fairness to Opposing Party and Counsel**
- **Explanation:**
 - o **Tampering with Evidence (§ 37.09):** Suppressing or selectively presenting evidence with the intent to affect judicial rulings constitutes tampering.
 - o **Obstruction of Justice (§ 1503):** Deliberate suppression of evidence obstructs the lawful administration of justice.
 - o **Fairness to Opposing Party (Rule 3.04):** Attorneys are ethically obligated to ensure fairness during discovery and evidence presentation.
- **Impact:**
 - o Obstructed the complainant's ability to **effectively challenge void court orders**.
 - o Resulted in rulings based on **incomplete or misrepresented evidence**.
 - o Caused **financial harm** through repeated motions to compel evidence disclosure.
 - o **Eroded trust in the legal process** and the attorney's professional conduct.

Summary of Attorney Jennifer Gibo's Alleged Violations

1. **Participation in the Issuance of Void and Fraudulent Orders**
2. **Misrepresentation of Legal Precedent in Advocacy**
3. **Suppression and Misuse of Evidence**

Statutes Violated:

- **18 U.S.C. § 1503, § 242**
- **Texas Penal Code § 37.10, § 32.46, § 39.02, § 37.09**
- **Texas Disciplinary Rules of Professional Conduct Rule 3.03, Rule 3.04**

Impact:

- **Influenced court rulings** through deceptive arguments and misrepresentation of precedent.
- Created **false judicial records**, obstructing procedural fairness.
- **Suppressed critical evidence**, affecting judicial outcomes.
- Caused **emotional distress** and **financial harm** due to prolonged litigation.
- **Undermined public trust** in the integrity of judicial proceedings.

6. Ashley Womack - The following allegations pertain specifically to misconduct observed in CAUSE NO.: 73540 and CAUSE NO.: 90398, where violations of geographic restrictions, deliberate misrepresentations to the court, and non-compliance with judicial mandates caused significant procedural and jurisdictional harm.

Allegation 1: Violation of Court-Ordered Geographic Restrictions

Specific Action:

On or about **June 2015**, Ashley Womack **unlawfully relocated** [REDACTED] **Wright to Parker County**, violating **explicit geographic restrictions established by a state court order**.

Despite multiple formal notifications and legal attempts to address this violation, **Ashley Womack failed to return** [REDACTED] **Wright to the proper jurisdiction** as mandated by the valid court order.

Statutes Violated:

Texas Penal Code § 25.03 – Interference with Child Custody

Texas Family Code § 152.202 – Jurisdiction Over Child Custody Determination

Explanation:

Violating geographic restrictions in a custody order constitutes **Interference with Child Custody under Texas Penal Code § 25.03**.

Ashley Womack's relocation of [REDACTED] **Wright disrupted jurisdictional authority under Texas Family Code § 152.202**, undermining the legal framework designed to ensure proper oversight and judicial authority in custody matters.

Supporting Evidence:

- Affidavits documenting relocation to Parker County.
- Court orders specifying geographic restrictions.
- Communication logs showing repeated attempts to address this violation.

Impact:

- Created **jurisdictional confusion**, delaying the proper adjudication of custody matters.
- Imposed **financial burdens** on the complainant due to repeated legal challenges.
- Resulted in emotional distress caused by uncertainty and procedural delays.
- Set a dangerous **precedent for jurisdictional non-compliance** in future cases.

Conclusion:

Ashley Womack's deliberate violation of court-ordered geographic restrictions constitutes **Interference with Child Custody**, directly violating state statutes and undermining the integrity of judicial authority.

Allegation 2: Fraudulent Misrepresentation to the Court

Specific Action:

Ashley Womack **knowingly provided false or misleading information to the court** regarding her compliance with custody orders and jurisdictional mandates.

She made **intentional misrepresentations in court filings and communications to conceal the jurisdictional violation** and obscure material facts from the court.

Statutes Violated:

- **Texas Penal Code § 37.10 – Tampering with Government Records**
- **Texas Penal Code § 32.46 – Securing Execution of Document by Deception**

Explanation:

- Providing false information in legal filings violates **Texas Penal Code § 37.10 (Tampering with Government Records)**.
- Misrepresenting material facts with the intent to influence judicial decisions constitutes **Securing Execution of Document by Deception (Texas Penal Code § 32.46)**.

Supporting Evidence:

- **Legal filings containing misrepresented facts.**
- **Affidavits documenting inconsistencies in Ashley Womack's representations.**
- **Correspondence between legal parties highlighting factual misstatements.**

Impact:

- Misrepresentation **delayed legal proceedings and increased procedural confusion.**
- Contributed to **void and improper judicial rulings.**
- Caused **financial harm** through unnecessary motions and procedural corrections.
- Eroded **trust in judicial integrity and fairness.**

Conclusion:

Ashley Womack's **fraudulent misrepresentation to the court** constitutes violations of **state statutes**, causing significant harm to the complainant and the judicial process.

Allegation 3: Interference with Judicial Processes

Specific Action:

Ashley Womack failed to comply with lawful court orders, actively obstructing the judicial process by refusing to appear at hearings, respond to motions, or adhere to rulings regarding jurisdiction and custody matters. Her actions caused unnecessary delays in court proceedings and prolonged adjudication of critical legal issues.

Statutes Violated:

- **Texas Penal Code § 25.03 – Interference with Child Custody**
- **Texas Penal Code § 32.46 – Securing Execution of Document by Deception**

Explanation:

- Failure to comply with lawful custody orders violates **Texas Penal Code § 25.03 (Interference with Child Custody)**.
- Misleading the court to delay proceedings or conceal non-compliance constitutes **Securing Execution of Document by Deception under Texas Penal Code § 32.46**.

Supporting Evidence:

- **Court orders.**

Impact:

- **Prolonged litigation and delayed custody determinations.**
- **Increased financial costs** due to repeated legal interventions.
- **Emotional distress** resulting from procedural uncertainty.
- **Erosion of trust in the family court system's ability to enforce orders effectively.**

Conclusion:

Ashley Womack's **interference with judicial processes** violated her legal obligations under state statutes and caused significant harm to the complainant and the administration of justice.

Statutes Violated by Ashley Womack

- **Texas Penal Code § 25.03 – Interference with Child Custody**
- **Texas Penal Code § 37.10 – Tampering with Government Records**
- **Texas Penal Code § 32.46 – Securing Execution of Document by Deception**
- **Texas Family Code § 152.202 – Jurisdiction Over Child Custody Determination**

Supporting Evidence

- Court Orders Detailing Geographic Restrictions
- Affidavits Documenting Relocation Violations
- Legal Filings Containing Misrepresentations
- Correspondence Highlighting Procedural Obstruction

Requested Actions Against Ashley Womack

- **Immediate Investigation by State Authorities:** A full investigation into statutory violations.
- **Criminal Prosecution:** Charges under relevant state statutes for custody interference and fraudulent misrepresentation.
- **Legal Remedies:** Enforcement of standing court orders and correction of procedural harm caused by her violations.
- **Financial Restitution:** Compensation for financial and emotional harm caused by her actions.
- **Court-Monitored Compliance:** Regular oversight to ensure future compliance with custody orders.

Conclusion

Ashley Womack's actions, including **violation of court orders, fraudulent misrepresentation, and interference with judicial processes**, represent **serious breaches of state laws**. These actions have caused **emotional distress, financial harm, and procedural delays** while eroding **public trust in the legal system**.

Immediate **investigation, prosecution, and accountability measures** are necessary to address her actions and **prevent further harm**.

IV. SYSTEMIC PATTERNS OF MISCONDUCT

The violations outlined in this complaint are not isolated incidents but part of a **persistent and deliberate pattern of misconduct**. These patterns indicate **systematic failures** within judicial and administrative processes, suggesting **willful collusion or gross negligence** rather than mere procedural errors. Below are the primary systemic patterns observed:

1. Repeated Issuance of Void Orders

- **Description:**
 - o Multiple judicial orders were issued **without proper jurisdiction**, including orders rendered while the case was removed to **federal court** and orders issued by courts that had lost jurisdiction through statutory mandates.
 - o Will Biard and F. Duncan Thomas continued issuing orders despite **clear jurisdictional challenges** and ongoing federal removal.
- **Manifestation:**
 - o Default Modification Orders issued under the **wrong court designation**.
 - o Nunc Pro Tunc Orders used to **retroactively legitimize judicial errors**, exceeding their procedural scope.
- **Impact:**
 - o Created **legal confusion and procedural delays**.
 - o Resulted in **prolonged litigation** and unnecessary appeals.
 - o Undermined **public confidence in judicial impartiality**.

Statutes Violated:

- **Texas Family Code § 155.001**
- **Texas Penal Code § 39.02**
- **18 U.S.C. § 242**

2. Systematic Obstruction of Legal Filings

- **Description:**
 - o Critical legal filings, including **jurisdictional challenges, motions for discovery, and valid procedural objections**, were intentionally delayed, mishandled, or outright refused by District Clerk Shawntel Golden under questionable circumstances.
 - o Attorneys Stephen Lawrence and Jennifer Gibo actively enabled or ignored these obstructions by failing to address procedural errors and continuing to advocate for void rulings.
- **Manifestation:**
 - o Refusal to process **jurisdictional transfer motions**.
 - o Misplacement of critical court filings, causing significant delays.
 - o Selective filing of documents to **obscure procedural timelines**.
- **Impact:**
 - o Denied the complainant **timely access to legal remedies**.
 - o Caused **unnecessary financial burdens** due to repeated motions and legal interventions.
 - o Obstructed **due process rights**, violating state and federal protections.

Statutes Violated:

- **Texas Penal Code § 36.06**
- **Texas Penal Code § 39.02**
- **18 U.S.C. § 1512**

3. Fraudulent Reliance on Legal Precedents

- **Description:**
 - o Legal precedents, including **Knox v. Long**, were **misrepresented and distorted** to justify void judicial actions, particularly in the misuse of **Nunc Pro Tunc Orders**.
 - o Attorneys Stephen Lawrence and Jennifer Gibo knowingly presented **false legal arguments** in court to mislead judges into issuing improper orders.
- **Manifestation:**
 - o **Knox v. Long** was cited to justify **substantive judicial corrections** under Nunc Pro Tunc, despite clear statutory limitations.
 - o Legal arguments were intentionally structured to obscure **material legal defects** in orders issued without jurisdiction.
- **Impact:**
 - o Created **false judicial records** based on misrepresented legal authorities.
 - o Obstructed fair resolution of the case through **procedural misdirection**.
 - o Increased **financial and emotional burdens** due to appeals and corrective motions.

Statutes Violated:

- Texas Penal Code § 32.46
- 18 U.S.C. § 1503
- Texas Disciplinary Rules of Professional Conduct Rule 3.03

4. Retaliatory Court Orders Against Lawful Challenges

- **Description:**
 - o Judicial and procedural actions were taken as **retaliation** against the complainant for **filing jurisdictional challenges, motions for discovery, and objections to void orders.**
 - o Court rulings appeared punitive in nature, imposing **unnecessary financial burdens** and restricting lawful access to due process.
- **Manifestation:**
 - o Punitive temporary orders issued without jurisdictional basis.
 - o Refusal to hear valid motions or allow meaningful participation in hearings.
 - o Deliberate imposition of restrictions that served no legitimate legal purpose.
- **Impact:**
 - o Created an **environment of intimidation and procedural hostility.**
 - o Increased **financial harm and emotional distress** for the complainant.
 - o Undermined the **core principles of impartiality and judicial fairness.**

Statutes Violated:

- Texas Penal Code § 36.06
- 18 U.S.C. § 242
- 42 U.S.C. § 1983

5. Abuse of Judicial and Administrative Authority

- **Description:**
 - o Will Biard and F. Duncan Thomas, along with District Clerk Shawntel Golden, consistently **exceeded their statutory authority** in both judicial rulings and administrative decisions.
 - o These abuses were further enabled by Attorneys Stephen Lawrence and Jennifer Gibo, who knowingly advocated for void actions.
- **Manifestation:**
 - o Repeated misuse of **Nunc Pro Tunc Orders** to cover judicial errors.
 - o Ignoring statutory mandates for **mandatory jurisdictional transfers.**
 - o Suppressing or mishandling **critical evidence and filings.**
- **Impact:**
 - o Resulted in **multiple void orders**, causing prolonged litigation.
 - o Denied the complainant **fundamental procedural protections.**
 - o Significantly eroded **trust in the judicial process.**

Statutes Violated:

- Texas Penal Code § 39.02
- Texas Penal Code § 37.10
- 18 U.S.C. § 242

Allegations against Specific Individual/Accused

This formal criminal complaint is filed against the following individuals:

WILL BIARD

DISTRICT CLERK SHAWNTEL GOLDEN

F. DUNCAN THOMAS

ATTORNEY STEPHEN LAWRENCE

ATTORNEY JENNIFER GIBO

ASHLEY WOMACK

Impact of the Violations:

These repeated and systemic violations have caused severe emotional harm, financial hardship, and procedural delays for the complainant. They have also eroded public confidence in the judiciary, undermined the rule of law, and exposed systemic failures requiring immediate corrective action.

This complaint is supported by a robust body of evidence, including court orders, affidavits, correspondence, and legal motions, meticulously cross-referenced with each violation.

Immediate investigation, prosecution, and disciplinary action are essential to restore judicial accountability and prevent further misconduct.

I allege that the above-named individuals, as well as any yet unnamed individuals, have **knowingly and willingly** violated the Constitutions of the United States and Texas, both Federal and State laws, and have 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 applicable named individuals to the State Commission on Judicial Conduct and the State Bar of Texas, in addition to the Office of the Attorney General Criminal Division for full investigation.

8. RELIEF

I, Rustin Wright, am DEMANDING a full investigation into the LAMAR County Courts, and its actors. I DEMAND that the Office of the Attorney General Criminal Division be contacted to head this investigation.

I, Rustin Wright, am DEMANDING the following Relief regarding: **WILL BIARD**

- 1. Immediate Termination of all Judicial Duties**
- 2. Immediate issuance of Arrest Warrant, or in the absence of, a formal request for the Office of the Attorney General Criminal Division to investigate ALL Lamar 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**
- 4. Public Disclosure of all Investigative Findings and Punishments assessed**

I, Rustin Wright, am DEMANDING the following Relief regarding: **DISTRICT CLERK SHAWNTEL GOLDEN**

1. **Immediate Termination from District Clerks Office**
2. **Immediate issuance of Arrest Warrant, or in the absence of, a formal request for the Office of the Attorney General Criminal Division to investigate ALL Lamar District Courts and related actors, named and as yet unnamed**
3. **Referral to all relevant oversight agencies, including but not limited to law enforcement**
4. **Public Disclosure of all Investigative Findings and Punishments assessed**

I, Rustin Wright, am DEMANDING the following Relief regarding: **F. DUNCAN THOMAS**

1. **Immediate Termination of all Judicial Duties**
2. **Immediate issuance of Arrest Warrant, or in the absence of, a formal request for the Office of the Attorney General Criminal Division to investigate ALL Lamar 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**
4. **Public Disclosure of all Investigative Findings and Punishments assessed**

I, Rustin Wright, am DEMANDING the following Relief regarding: **ATTORNEY STEPHEN LAWRENCE**

1. **Immediate Termination of Texas State Bar privileges/authorities**
2. **Immediate issuance of Arrest Warrant, or in the absence of, 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**
4. **Public Disclosure of all Investigative Findings and Punishments assessed**

I, Rustin Wright, am DEMANDING the following Relief regarding: **ATTORNEY JENNIFER GIBO**

1. **Immediate Termination of Texas State Bar privileges/authorities**
2. **Immediate issuance of Arrest Warrant, or in the absence of, 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**
4. **Public Disclosure of all Investigative Findings and Punishments assessed**

I, Rustin Wright, am DEMANDING the following Relief regarding: **ASHLEY WOMACK**

1. **Immediate issuance of Arrest Warrant, or in the absence of, a formal request for the Office of the Attorney General Criminal Division for full criminal investigation**
2. **Immediate referral to ALL oversight and Licensing Boards for counselors/psychologists in the State of Texas, for violations of her oath and criminal activities.**

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 record, that you do, with full known malice and intent, support the unlawful abrogation of the Peoples' Constitutional rights, **a violation of your oath to the Constitutions of these United States, including the Texas Constitution, Article 16, Section 1.**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, **Rustin Wright**, 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.

1. BACKGROUND OF AFFIANT

I am a politically active Texas father with a longstanding commitment to exposing corruption within our state's judicial system and holding elected officials accountable. As a Board Member of *Texans for Judicial Accountability*, I bring over two decades of direct experience navigating the systemic failures and misconduct within the Texas Family Courts. In addition, I serve as a Precinct Chair in my county, where I work tirelessly to promote transparency, integrity, and accountability in our legal institutions. My dedication to confronting and dismantling the deeply rooted corruption within the Texas Family Courts is resolute, and I remain steadfast in my pursuit of justice until these systemic crimes are fully investigated, addressed, and corrected.

This formal criminal complaint arises specifically from actions and misconduct occurring within the context of **Parker County CAUSE NO.: CV18-1452** and **Lamar County CAUSE NO.: 73540 which was illegally transferred to Parker County**, detailing 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 these two cases.

2. STATEMENT OF PURPOSE

This Affidavit is being submitted as Evidence of a Complaint against the following named, and as yet unnamed individuals:

JUDGE GRAHAM QUISENBERRY, ADMINISTRATIVE JUDGE DAVID EVANS, ATTORNEYS STEPHEN LAWRENCE AND ROBERT A. THORNTON, AMICUS ATTORNEY ZACHARY Q. PETTIGREW, ASHLEY WOMACK, AND ADDITIONAL CRIMINAL ACTORS IN PARKER COUNTY.

The violation of Constitutional Protections/Rights by the actors herein constitute crimes that must be referred for prosecution once Probable Cause has been met, and that is accomplished as follows.

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.

Note. 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.

3. 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 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.

4. 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 has 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 as follows:*

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.

5. 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.

6. STATEMENT OF LIMITED PRESENTATION OF FACTS

This affidavit does not include all 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.

7. STATEMENT OF FACTS

My name is **Rustin Wright**. 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.

I. INTRODUCTION

This formal criminal complaint is filed against the following individuals:

- **Judge Graham Quisenberry (Parker County)**
- **Judge David Evans (Administrative Judge)**
- **Attorney Robert A. Thornton**
- **Attorney Stephen Lawrence**
- **Amicus Attorney Zachary Q. Pettigrew**
- **Ashley Womack**

This document details repeated violations of Texas State Law, Federal Statutes, and Judicial Oaths of Office, culminating in fraudulent court orders, obstruction of justice, tampering with government records,

and abuse of judicial authority. These acts have caused irreparable harm to the complainant, undermined procedural fairness, and eroded public trust in the judicial system.

Scope of the Complaint:

- Documented timeline of violations with dates and context.
- Legal analysis of statutory violations for each event.
- Cross-referenced evidence to substantiate claims.
- Analysis of harm caused to the complainant and others.
- Requests for investigation, accountability, and systemic reform.

Supporting documentation includes **affidavits, court orders, motions, transcripts, and correspondence** that substantiate each allegation.

II. EXECUTIVE SUMMARY

This Verified Criminal Complaint outlines systemic judicial and legal misconduct in Parker County, Texas, spanning many years. It details violations of jurisdictional requirements, suppression of evidence, retaliation against lawful legal challenges, and other abuses of power. These actions have caused significant harm to Rustin Wright, his son [REDACTED] Wright, and the integrity of the judicial process.

Key Violations Identified Include:

1. Fraudulent Court Orders

- **Description:** Judge Graham Quisenberry knowingly issued orders in a case where Parker County lacked jurisdiction. These orders were issued despite repeated legal objections from the complainant, Rustin Wright, explicitly identifying jurisdictional defects. The void and fraudulent orders led to significant harm, including custody modifications, unwarranted detentions, financial sanctions, and the prolonged separation of a minor, [REDACTED] Wright, from his father. These actions involved the misuse of federal funds under Title IV-D of the Social Security Act, as these orders were used to enforce child support obligations based on void judgments.
- **Examples:**
 - o Around **August 2018** - Initial orders in Cause No. CV18-1452 were issued in Parker County without a valid transfer of jurisdiction from Lamar County. The transfer was initiated sua sponte by the Lamar County judge during a pending federal case removal, violating statutory and constitutional requirements. These jurisdictional defects rendered all subsequent orders void. Despite this, child support enforcement actions proceeded, improperly utilizing federal Title IV-D funds.
 - o On or about **September 20, 2019** - **Judge Graham Quisenberry issued a no contact order against Rustin Wright all forms of communication or interaction with his son, [REDACTED] Wright** . The order prohibited physical, aural, and written correspondence between [REDACTED] father and son. It also restricted Rustin Wright's possession of [REDACTED] This order caused long-term emotional harm to [REDACTED] who was sent to boarding schools far from both parents during his high school years. Despite objections highlighting

jurisdictional issues This void order denied Rustin and [REDACTED] Wright a parent-child relationship [REDACTED]'s entire high school years until he turned 18 years old. Federal funds under Title IV-D were utilized to enforce obligations stemming from these void orders, in violation of federal law and due process.

- o On or about **October 3, 2019**: Judge Graham Quisenberry issued an order to have [REDACTED] Wright shackled and transported to the Dallas Juvenile Detention Center without legal jurisdiction or justification. [REDACTED] was not allowed to see or speak to his father again until he was 18 years of age. [REDACTED] was sent to a reform boarding school called Resolution Ranch Academy his freshman year of high school then an all-boys Catholic boarding school in Omaha, NE his sophomore, junior and senior years. These actions, carried out under void orders, were facilitated by the improper use of federal funds earmarked for legitimate child support enforcement efforts.

- **State Laws Violated:**

- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Judge Graham Quisenberry intentionally misused judicial authority by issuing orders outside the scope of Parker County's jurisdiction. This misuse extended to custody modifications, no contact orders, and punitive sanctions despite documented jurisdictional defects. The issuance of orders without legal jurisdiction constitutes an intentional violation of state law and abuse of judicial office.
- o **Texas Family Code § 155.001 – Continuing Exclusive Jurisdiction** - Under this provision, the court in Lamar County retained exclusive jurisdiction over the case unless a valid transfer occurred. The sua sponte transfer initiated by the Lamar County court did not comply with statutory requirements, invalidating Parker County's jurisdiction. The improper transfer and subsequent rulings ignored the statutory safeguards meant to prevent jurisdictional overreach in family law cases, violating this provision.
- o **Texas Penal Code § 37.10 – Tampering with Government Records** - Fraudulent judicial orders asserting jurisdiction created false government records, misleading parties, and enforcement authorities. The orders signed by Judge Quisenberry, including financial sanctions and custody rulings, constitute tampered government records as they misrepresented the court's authority and legal jurisdiction.
- o **Texas Penal Code § 39.03 – Official Oppression** - By issuing and enforcing orders outside the court's jurisdiction, Judge Quisenberry subjected Rustin Wright and his son to unlawful restrictions and penalties. Actions such as the punitive no contact order and financial sanctions were oppressive, retaliatory, and lacking legal basis, amounting to official misconduct.
- o **Void Orders Doctrine** - Orders issued by a court that lacks jurisdiction are legally null and void under both state and federal law. In this case, the lack of a valid transfer of jurisdiction from Lamar County to Parker County rendered all subsequent orders invalid. This doctrine applies to all orders issued in Parker County for lack of jurisdiction including the on or about **September 20, 2019, no contact order**, the on or about **October 3, 2019**, detention order for [REDACTED] Wright, and all subsequent rulings. These orders lacked the force of law and caused harm to the complainant and his son through improper enforcement.

- **Federal Laws Violated:**

- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - The court's actions deprived Rustin and [REDACTED] Wright of their constitutional rights to due process and familial association, executed under the guise of lawful judicial authority. The no contact order and detention orders directly infringed upon these rights, leaving Rustin Wright without a meaningful opportunity to maintain a relationship with his son or to challenge the court's improper jurisdiction.
- o **18 U.S.C. § 641 – Theft or Conversion of Federal Funds** - This statute prohibits the unauthorized use, theft, or conversion of federal funds for improper purposes. Federal funds allocated under Title IV-D of the Social Security Act are intended to enforce valid child support orders in compliance with federal law. However, these funds were improperly used to enforce void child support orders, constituting unauthorized use of federal resources.
- o **18 U.S.C. § 1001 – False Statements or Fraudulent Claims** - This statute criminalizes making false statements, concealing material facts, or submitting fraudulent claims to the federal government. State agencies involved in enforcing void child support orders submitted claims for federal reimbursement under Title IV-D, despite these orders being legally unenforceable. This constitutes fraud against the federal government.
- o **42 U.S.C. § 658 – Compliance Requirements for Title IV-D Funding** - Federal law mandates that states comply with constitutional due process and other legal standards to qualify for reimbursement under Title IV-D. By enforcing void orders lacking jurisdiction or due process, state agencies violated these compliance requirements and improperly claimed federal funds.
- o **18 U.S.C. § 371 – Conspiracy to Commit Offense or Defraud the United States** - This statute applies when two or more individuals conspire to defraud the United States or commit any offense against it. State officials or agencies that knowingly collaborated to enforce void orders and claim federal funds are liable under this statute for conspiracy to misuse federal funds.
- o **18 U.S.C. § 1346 – Honest Services Fraud** - Corruption or misuse of judicial office to deprive Rustin Wright of the honest services owed to him under the law constitutes a violation of this statute. The fraudulent issuance and enforcement of void court orders by Judge Quisenberry, supported by other parties, reflect a deliberate breach of the fiduciary duty of fairness and impartiality owed to those appearing before the court.
- o **18 U.S.C. § 1341 – Mail Fraud** - Void orders, payment demands, and related correspondence sent via mail perpetuated the harm caused to Rustin and [REDACTED] Wright. These communications falsely represented Parker County's jurisdiction and authority, serving as tools to enforce fraudulent actions and extract financial penalties.
- o **18 U.S.C. § 1343 – Wire Fraud** - Electronic communications, including emails used to issue or enforce void orders, qualify as wire fraud. These communications facilitated the

fraudulent actions against Rustin and [REDACTED] Wright, including perpetuating void proceedings and demanding compliance with unauthorized rulings.

- o **18 U.S.C. § 666 – Theft or Bribery Concerning Programs Receiving Federal Funds -** If federal funds supported Parker County’s judicial system, detention facilities, or court-related programs, the misuse of jurisdiction and issuance of void orders to impose financial penalties or sanctions constitutes theft or fraud under this statute. For example, financial sanctions against Rustin Wright, imposed through void orders and under threat of incarceration, diverted resources obtained unlawfully under the guise of judicial authority.
- o **18 U.S.C. § 1028 – Fraud and Related Activity in Connection with Identification Documents, Authentication Features, and Information -** Fraudulent court orders issued without jurisdiction serve as unauthorized and false documents used to authenticate Parker County’s legal authority. These documents, presented as official government records, misrepresented the court’s jurisdiction, and were used to enforce unlawful rulings and actions against the Wrights.
- o **Due Process Clause – Fourteenth Amendment to the U.S. Constitution -** The enforcement of void orders violated the complainant's rights under the Due Process Clause of the Fourteenth Amendment. Orders issued without jurisdiction or proper notice lack legal validity, and their enforcement constitutes a deprivation of rights under color of law.
- o **Equal Protection Clause – Fourteenth Amendment to the U.S. Constitution -** The discriminatory enforcement of void orders disproportionately affected the complainant, denying equal protection under the law and further violating constitutional safeguards.
- o **18 U.S.C. § 1962 – Racketeer Influenced and Corrupt Organizations Act (RICO) -** The systemic issuance of void court orders, fraudulent rulings, and misuse of judicial authority in Parker County, Texas, constitutes a pattern of racketeering activity as defined under **RICO**. These actions, compounded by the coordinated participation of multiple parties, including Judge Graham Quisenberry, Judge David Evans, opposing counsel (e.g., Robert Thornton and Stephen Lawrence), Amicus Attorney Zachary Pettigrew, and Ashley Womack demonstrate a deliberate scheme to deprive Rustin and [REDACTED] Wright of their constitutional rights to due process and familial association.

The repeated issuance of fraudulent rulings, including no contact orders, custody modifications, and financial sanctions, formed the foundation of this racketeering activity. These rulings, made without valid jurisdiction, perpetuated void proceedings, and inflicted lasting and irreparable harm on the Wrights. Fraudulent filings, suppression of evidence, and tampering with governmental records further illustrate the ongoing unlawful conduct, all of which contributed to the deprivation of Rustin and [REDACTED] Wright’s legal rights.

This coordinated scheme reflects the existence of an enterprise operating with a shared purpose: to perpetuate void proceedings, obstruct justice, and exploit Rustin Wright

financially. Key participants were Judge Graham Quisenberry, Judge David Evans, opposing counsel (e.g., Robert Thornton and Stephen Lawrence), Amicus Attorney Zachary Pettigrew, and Ashley Womack. They acted in concert to suppress evidence, misrepresent jurisdictional authority, and enforce punitive actions. These actions align with RICO's definition of an enterprise engaging in a pattern of racketeering activity.

Specific predicate acts under RICO include fraudulent court rulings, tampering with governmental records, obstruction of justice, and extortion. **Fraud is evident in the deliberate issuance of void orders to misrepresent jurisdiction.** Evidence tampering and suppression further concealed procedural defects that would have invalidated the court's authority. Obstruction of justice occurred through delays, suppression of testimony, and deliberate interference with the judicial process. **Extortion is apparent in the imposition of financial sanctions and attorney fees against Rustin Wright under threat of incarceration, despite the court's lack of jurisdiction.**

The enterprise's actions affected interstate commerce, as [REDACTED] Wright was sent to an out-of-state institution, named Mount Michael Benedictine School in Nebraska. This placement extended the harm beyond Texas, satisfying RICO's requirement that the enterprise's activities impact interstate commerce.

Under **18 U.S.C. § 1962(c)**, it is unlawful for any person employed by or associated with an enterprise to conduct its affairs through a pattern of racketeering activity. The coordinated and repeated actions described in this case demonstrate a violation of RICO's statutory requirements. The deliberate harm caused to Rustin and [REDACTED] Wright underscores the severity of the misconduct and highlights the need for accountability.

This case exemplifies the misuse of judicial and legal authority to orchestrate and maintain a pattern of harm for personal and financial gain. The systematic abuse caused irreparable harm to Rustin and [REDACTED] Wright while undermining public trust in the judicial process. These coordinated efforts meet the statutory criteria for racketeering activity under **18 U.S.C. § 1962**.

2. Obstruction of Justice

- **Description:** Deliberate actions taken to impede the fair administration of justice, including suppression of key filings, delays in hearings, and obstruction of evidence presentation.
- **Examples:**
 - o On or about **September 24, 2019** Attorney Robert A. Thornton suppressed evidence critical to establishing jurisdictional errors, filed misleading motions, and obstructed the presentation of testimony concerning [REDACTED] Wright's well-being. Thornton withdrew as counsel shortly after this date.
 - o On or about **March 2021** Attorney Stephen Lawrence, acting as counsel for Ashley Womack, argued that Parker County had jurisdiction over the case despite clear evidence to the contrary. His assertions ignored statutory requirements under the Texas Family Code and the documented procedural defects in the transfer of jurisdiction from Lamar

County. By advancing this knowingly flawed argument, Lawrence misled the court and contributed to the continuation of void proceedings, constituting **fraud upon the court.**

- o On or about **January 15, 2020** Amicus Attorney Zachary Q. Pettigrew advised against allowing [REDACTED] Wright to testify about abuse allegations, thereby preventing key evidence from being presented to the court. Amicus Attorney Zachary Q. Pettigrew knew full well that Parker County never acquired jurisdiction because I met with him at his office to discuss it right after Judge Quisenberry assigned him to the case. He committed **fraud upon the court** and continued on the case to extort money from me while doing everything in his power to sabotage my case. He did this willfully and intentionally with malicious intent.

- **State Laws Violated:**

- o **Texas Penal Code § 37.09 – Tampering with Evidence** - Thornton and Lawrence misrepresented evidence and concealed critical jurisdictional facts that would have invalidated the court’s authority to act. Judge Quisenberry and Amicus Attorney Pettigrew contributed to this violation by disregarding evidence, suppressing [REDACTED] Wright’s testimony, and issuing or supporting orders that relied on misrepresented facts.
- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Judge Graham Quisenberry abused his official capacity by issuing orders outside of the court’s jurisdiction, including custody modifications, financial sanctions, and no contact directives. These orders required the complainant, Rustin Wright, to pay significant amounts to Amicus Attorney Zachary Q. Pettigrew under threat of incarceration, despite the court’s lack of jurisdiction. Thornton and Lawrence’s knowingly flawed arguments further enabled this misuse of judicial authority. Pettigrew also benefited financially from these orders, creating a conflict of interest that undermined his impartiality and statutory duty to act in the best interests of the child. Together, these actions perpetuated harm, deprived the complainant of his legal rights, and financially exploited the situation.
- o **Texas Penal Code § 39.03 – Official Oppression** - Judge Graham Quisenberry misused his official capacity by issuing punitive orders, including financial sanctions and custodial restrictions, without proper jurisdiction. These actions inflicted harm and intimidation on Rustin Wright, depriving him of legal rights and further separating him from his son.
 - Thornton and Lawrence, while not public servants, acted as accomplices by advancing flawed legal arguments to perpetuate void proceedings and supporting punitive actions, knowing the court lacked jurisdiction.
 - Amicus Attorney Zachary Q. Pettigrew, while acting in a quasi-public role, suppressed [REDACTED] Wright’s testimony, denied the child a voice in court, and directly benefited financially from the judge’s orders, further perpetuating harm to both Rustin and [REDACTED] Wright.
- o **Void Orders Doctrine** - This doctrine establishes that orders issued by a court lacking jurisdiction are null and void, with no legal effect. In this case, the sua sponte transfer of the case from Lamar County to Parker County while the case was removed to federal court violated statutory requirements under Texas Family Code § 155.001, rendering all

subsequent proceedings and orders legally invalid. Despite this, Thornton, Lawrence, Judge Quisenberry, Judge Evans, and Amicus Pettigrew continued to participate in and enforce void proceedings, perpetuating harm to Rustin and ██████ Wright and obstructing justice by preventing the proper adjudication of jurisdictional defects.

- **Federal Laws Violated:**

- o **18 U.S.C. § 1503 – Obstruction of Justice** – Robert A. Thornton and Stephen Lawrence, as opposing counsel, advanced arguments supporting Parker County’s jurisdiction despite documented legal defects, misleading the court and perpetuating void proceedings. Judge Graham Quisenberry further obstructed justice by issuing orders based on these arguments, disregarding statutory jurisdictional requirements, and failing to address objections. Amicus Attorney Zachary Q. Pettigrew contributed to this obstruction by participating in the case and advising against ██████ Wright’s testimony and suppressing critical evidence necessary to a fair adjudication. These actions impeded the administration of justice and deprived the complainant and his son of due process and a fair legal process.
- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - By perpetuating void proceedings, Thornton, Lawrence, Quisenberry, Evans, and Pettigrew deprived Rustin Wright of his constitutional rights to due process and familial association. The court’s actions, under the guise of judicial authority, inflicted significant harm, including the unlawful separation of ██████ Wright from his father.

3. Tampering with Evidence and Records

- **Description:** Government and court records were falsified, altered, or concealed to misrepresent jurisdictional facts and obstruct the complainant’s ability to obtain fair legal remedies. These actions included issuing void court orders, suppressing evidence, and creating records that misrepresented the court’s jurisdiction and rulings.
- **Examples:**
 - o **2018–2023:** Every single court order, including custody modifications, financial sanctions, and no contact directives, were issued under false pretenses. These orders falsely claimed valid jurisdiction despite documented procedural defects in the transfer of the case from Lamar County to Parker County.
- **State Laws Violated:**
 - o **Texas Penal Code § 37.10 (Tampering with Government Records):** Judges and court officials created and enforced orders that misrepresented the court’s jurisdiction. These falsified records were used to justify rulings and sanctions that were legally void.
 - o **Texas Penal Code § 37.09 (Tampering with Evidence):** Opposing counsels Thornton and Lawrence and amicus Pettigrew suppressed or concealed evidence critical to proving jurisdictional defects and ██████ Wright’s preferences, directly influencing the outcome of legal proceedings.
 - o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Judge Quisenberry’s misuse of judicial authority to issue orders outside of lawful jurisdiction directly contributed to the falsification of official court records and the concealment of procedural defects.

- o **Void Orders Doctrine** - This doctrine establishes that orders issued by a court lacking jurisdiction are legally null and void. In this case, the sua sponte transfer of the case from Lamar County to Parker County While the case had been removed to federal court violated statutory requirements under Texas Family Code § 155.001, rendering all subsequent orders void. Despite their invalidity, these void orders were used to create official records that misrepresented the court’s authority and inflicted harm on Rustin and █████ Wright.

4. Retaliatory Court Actions

- **Description:** Judicial and administrative actions were taken to retaliate against Rustin Wright for raising lawful legal challenges, particularly objections to the court’s jurisdiction. These actions included punitive financial sanctions, unjust custodial orders, and the issuance of no contact directives. The intent was to intimidate and penalize Rustin Wright, discouraging him from continuing to assert his legal rights.
- **Examples:**
 - o On or about **October 3, 2019 – Retaliatory Detention Order** - Judge Graham Quisenberry issued a detention order for █████ Wright, a minor, without legal justification. █████ was shackled and transported to the Dallas Juvenile Detention Facility, following complaints raised by Rustin Wright about the court’s jurisdiction. The order separated █████ from his father and caused significant emotional harm.
 - o On or about **September 20, 2019 – No Contact Ord** - A no contact order was issued, prohibiting Rustin Wright from communicating with █████ Wright in any form. This order was issued after Rustin Wright challenged the court’s jurisdiction and highlighted procedural defects in the transfer from Lamar County.
 - o On or about **March 23, 2020**, on or about **June 18, 2020**, on or about **February 2, 2021**, on or about **May 25, 2021**, on or about **March 31, 2022**, and on or about **April 21, 2022 – Punitive Financial Sanctions** - Judge Quisenberry imposed financial sanctions against Rustin Wright for raising jurisdictional objections. These sanctions included attorney fees and payments to opposing counsel, Ashley Womack, and Amicus Attorney Zachary Q. Pettigrew under threat of incarceration, creating undue financial hardship and further intimidation.
 - o Between **2018–2022 – Pattern of Punitive Rulings** - Throughout the proceedings, the court’s actions, including the denial of Rustin Wright’s motions, suppression of evidence, and enforcement of void orders, demonstrated a pattern of retaliation aimed at discouraging lawful challenges to the court’s authority.
- **State Laws Violated:**
 - o **Texas Penal Code § 36.06 (Retaliation)** - This statute prohibits harming or threatening to harm another person in retaliation for their legal actions or exercise of rights. The court’s actions, including financial sanctions and custody restrictions, were issued in response to Rustin Wright’s lawful challenges to jurisdictional defects. These punitive actions were designed to intimidate and penalize Wright, discouraging him from continuing to assert his legal rights. For example, the financial sanctions imposed on or about **April 21, 2022**, under the threat of incarceration directly targeted Wright’s

objections, while the on or about **September 20, 2019**, custodial restrictions punished his efforts to expose jurisdictional irregularities.

- o **Texas Penal Code § 39.03 (Official Oppression):** This statute prohibits a public servant from misusing their position to intentionally harm or intimidate another. Judge Graham Quisenberry misused his judicial authority by issuing orders outside of his jurisdiction, including no contact directives and financial penalties. These orders lacked legal validity and served to oppress Wright by depriving him of his rights as a parent. The on or about **September 20, 2019, no contact order**, for example, effectively severed the parent-child relationship between Rustin and [REDACTED] Wright without legal justification, inflicting emotional harm on both.
- o **Void Orders Doctrine** - This doctrine establishes that orders issued by a court lacking jurisdiction are null and void, with no legal effect. In this case, the sua sponte transfer of the case from Lamar County to Parker County while the case was removed to federal court violated statutory requirements under Texas Family Code § 155.001, rendering all subsequent orders void. These void orders, including no contact directives, financial sanctions, and custody modifications, were enforced despite the lack of jurisdiction. Their enforcement compounded the harm caused to Rustin and [REDACTED] Wright, depriving them of due process, fair legal remedies, and their constitutional rights.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - This federal statute prohibits the deprivation of constitutional rights under the guise of lawful authority. The court's retaliatory actions deprived Rustin Wright of his constitutional rights, including due process and the right to familial association, by enforcing void orders and punishing him for lawful challenges. [REDACTED] Wright was similarly deprived of his right to maintain a relationship with his father and present his testimony in court. These violations were carried out under the pretense of judicial authority, masking the harm inflicted on the Wrights.

5. Emotional and Psychological Abuse of [REDACTED] Wright

- **Description:** [REDACTED] Wright, a minor at the time, endured significant emotional and psychological harm as a direct result of systemic misconduct in this case. The court's decisions deprived [REDACTED] of his relationship with his father, excluded his voice in critical legal proceedings, and disregarded his best interests. This harm constitutes **child abuse** under **Texas Penal Code § 22.04 (Injury to a Child)** and **Texas Family Code § 261.001(1)(C), which defines emotional abuse as "emotional or mental injury to a child that results in an observable and material impairment in the child's growth, development, or psychological functioning."** Expert evaluations, including findings by Dr. Brooks [REDACTED] nzie, substantiate this harm. The prolonged separation from his father and suppression of [REDACTED] testimony inflicted lasting trauma, while systemic actions by the court and involved parties exacerbated the harm.
- **Examples:**
 - o On or about **October 3, 2019, Void Detention Order** - Judge Graham Quisenberry issued an order requiring [REDACTED] Wright to be shackled and transported to [REDACTED] as [REDACTED] Juvenile Detention Center [REDACTED] lacking jurisdiction. This action caused [REDACTED] significant emotional distress. He was later sent to multiple boarding schools [REDACTED] from [REDACTED] both parents, further isolating him and deepening his psychological harm.

- o On or about **January 15, 2020 - Suppression of Testimony** - Amicus Attorney Zachary Q. Pettigrew advised against allowing [REDACTED] Wright to testify about abuse allegations. This suppression effectively silenced [REDACTED] voice in court, denying him the opportunity to present critical evidence to his expertise and preferences. Amicus Attorney Zachary Pettigrew recommended suppressing [REDACTED]'s testimony about abuse allegations, effectively silencing his voice, and denying [REDACTED] justice.
- o Between **2018–2022 – Coordinated Suppression of Evidence and Relationship** - Through the issuance of fraudulent court orders and suppression of testimony, the court obstructed [REDACTED]'s relationship with his father. These actions included a no contact order issued on **September 20, 2019** and financial sanctions imposed on Rustin Wright. The resulting separation caused [REDACTED] ongoing emotional harm, as documented in expert evaluations.

- **State Laws Violated:**

- o **Texas Penal Code § 22.04 (Injury to a Child)** - The prolonged deprivation of [REDACTED] relationship with his father and suppression of his testimony inflicted significant emotional and psychological harm, constituting child abuse under this statute.
- o **Texas Penal Code § 36.05 (Tampering with Testimony)** - Amicus Attorney Zachary Pettigrew's recommendation to suppress [REDACTED]'s testimony, combined with the court's enforcement of this suppression, denied [REDACTED] the opportunity to provide evidence critical to his best interests.
- o **Texas Family Code § 261.00 – Emotional Abuse (Definition of Child Abuse)** - Emotional or mental injury to [REDACTED] resulting in material impairment of his growth, development, or psychological functioning meets the statutory definition of child abuse. The suppression of testimony, isolation, and separation from his father contributed directly to this harm.

- **Federal Laws Violated:**

- o **18 U.S.C. § 241 (Conspiracy Against Rights)** - Coordinated actions by Judge Quisenberry, Zachary Pettigrew, and opposing counsels Robert Thornton and Stephen Lawrence deprived [REDACTED] of his constitutional rights to familial association and participation in the judicial process. These actions represent a deliberate conspiracy to violate his rights under the guise of lawful authority.

Impact of the Violations:

These repeated and systemic violations have inflicted significant emotional harm, financial hardship, and procedural delays on the complainant, Rustin Wright, and his then minor son, [REDACTED] Wright. The prolonged separation of [REDACTED] from his father caused lasting psychological trauma, while the misuse of judicial authority and the suppression of evidence deprived the complainant of fair legal remedies.

This misconduct has further eroded public confidence in the judiciary, undermined the rule of law, and exposed critical systemic failures in judicial oversight, legal ethics, and procedural adherence. The harm extends beyond the immediate parties, highlighting the broader risks posed by unchecked judicial misconduct and failures to enforce statutory safeguards.

This complaint is supported by a robust body of evidence, including:

- Court Orders: Demonstrating jurisdictional defects and the issuance of void rulings.

- Affidavits and testimony documenting harm caused by judicial actions and corroborating key allegations.
- Correspondence and Legal Motions Highlighting objections, procedural defects, and suppressed evidence.

Immediate corrective action is required, including investigation, prosecution, and disciplinary measures, to:

1. Hold all responsible parties accountable.
2. Restore public trust in the judiciary.
3. Protect the rights of individuals from further systemic abuse.

III. ALLEGATIONS AND VIOLATIONS

Each accused individual is presented below with their alleged violations, statutory breaches, supporting evidence, and the harm caused.

1. Judge Graham Quisenberry

Allegation 1: Issuing Fraudulent Court Orders Without Jurisdiction

- **Specific Action:**
 1. Judge Graham Quisenberry knowingly, willfully, and intentionally issued many years of court orders in a case where he lacked jurisdiction. These orders were issued despite explicit objections and filings from the complainant demonstrating the court's lack of authority. The fraudulent orders caused significant harm to the complainant and his minor son, [REDACTED] Wright, by infringing upon constitutional rights, prolonging litigation, and exacerbating emotional distress.
 2. Among these orders, Judge Quisenberry issued multiple directives requiring the payment of financial penalties and attorney fees under the explicit threat of incarceration. These void orders mandated payments that were enforced coercively, including through contempt proceedings and threats of jail time, despite being issued without lawful jurisdiction.
- **List of some of the void orders issued over the years:**
 1. Order Transferring Suit Affecting Parent-Child Relationship – on or about **September 5, 2018**.
 2. Temporary Restraining Order and Order Setting Hearing for Temporary Orders – on or about **August 15, 2019**.
 3. Order Appointing Amicus Attorney – on or about **August 28, 2019**.
 4. Temporary Orders – on or about **August 28, 2019**.
 5. Order on Petitioner's Motion for Further Temporary Orders – on or about **September 20, 2019**. Judge Quisenberry issued an order that barred Rustin Wright from all forms of contact with his son, [REDACTED] Wright, including physical, aural, and written communication. The order revoked Rustin Wright's right of possession of [REDACTED], granting Ashley Womack exclusive possession. This order was issued even though the

case had been removed to federal court the day prior to the hearing on **September 19, 2019**, rendering the state court without jurisdiction redundantly so. As a result, the order lacked legal validity and was procedurally improper. Its issuance highlights significant jurisdictional defects and procedural misconduct, further contributing to the harm experienced by Rustin and [REDACTED] Wright

6. Order for Issuance of Writ of Attachment – on or about **September 24, 2019**.
7. Order of Referral – on or about **September 25, 2019**.
8. On or about **October 3, 2019**, Judge Graham Quisenberry issued an order mandating the detention of [REDACTED] Wright, a minor, and authorized his shackling and transport to the Dallas Juvenile Detention Center.
9. Order Denying Motion to Recuse – on or about **October 17, 2019** by Administrative Judge David Evans who was fully aware that Parker County did not have jurisdiction.
10. Additional Temporary Orders – on or about **March 23, 2020**, **Judge Quisenberry ordered Rustin Wright to pay \$5,360 in interim attorney fees to the amicus attorney**, to be made in cash, cashier's check, or money order. Contempt proceedings were authorized to enforce compliance, with a request for jail time for nonpayment.
11. Order for Telephonic Counseling – on or about **May 1, 2020**.
12. On or about **June 18, 2020**, **Judge Graham Quisenberry ordered Rustin Wright to pay \$540.00 in interim attorney's fees to Amicus Attorney Zachary Q. Pettigrew** by August 1, 2020, deeming the fees necessary for the child's welfare.
13. Additional Temporary Orders for Payment of Amicus Fees (on or about **February 2, 2021**) - **Ordered \$4,541.89 payable to the amicus attorney, with explicit provisions for contempt enforcement, including potential incarceration**.
14. Order on Amicus Attorney's Motion for Protection from Deposition – on or about **May 2021**.
15. Order Granting Additional Amicus Fees – on or about **May 25, 2021** - **Directed the payment of \$4,438 by June 14, 2021, with threats of contempt proceedings for failure to comply**.
16. Order Denying Respondent's Motion to Vacate Void Orders and for Declaratory Judgment – on or about **June 11, 2021**.
17. Order on Motion to Exclude Testimony of Brooks McKenzie, Ph.D. – on or about **March 29, 2022**.
18. **Contempt Judgment** – on or about **March 31, 2022**. Judge Graham Quisenberry of the Parker County District Court issued a Contempt Judgment against Rustin Wright following a hearing on Ashley Womack's motion to enforce child support obligations. The court found Wright in contempt for failing to comply with child support orders from the August 23, 2018, Nunc Pro Tunc Order in Suit to Modify Parent-Child Relationship, with arrearages totaling \$39,202.92 as of March 25, 2022. **Wright was sentenced to 172 days in jail, suspended on the condition that he comply with payment requirements**

for current and past-due child support, attorney's fees of \$3,500, and other court orders.

19. Final Order in Suit to Modify Parent-Child Relationship – on or about **April 21, 2022**. Judge Graham Quisenberry signed a void Final Order in Suit to Modify Parent-Child Relationship, which removed Rustin Wright and Ashley Womack as joint managing conservators of their son, [REDACTED] Wright. The order appointed Womack as sole managing conservator with exclusive decision-making authority, while Wright was designated a possessory conservator, limiting his visitation rights to those mutually agreed upon with Womack. Wright was also ordered to pay significant attorney's fees, child support arrearages, and ongoing support obligations. Despite Wright's objections and challenges to the court's jurisdiction, the order reaffirmed Parker County's authority, solidifying the changes, and furthering the financial and emotional impact on Wright and his relationship with [REDACTED] **Wright was not allowed to see or speak to his minor son, [REDACTED] until he turned 18 years old.**

20. Notice of Judgment or Final Order – on or about **April 22, 2022**.

- **State Statutes Violated:**

- o **§ 37.10 – Tampering with Government Records** - Judge Graham Quisenberry created false judicial records by issuing void orders while knowingly lacking jurisdiction. These orders misled enforcement authorities, public institutions, and the parties involved, resulting in unlawful actions such as financial penalties, detention, and restricted communication.
- o **§ 37.13 – Record of a Fraudulent Court** - Orders issued under the pretense of valid jurisdiction, including those mandating payments, detentions, and other sanctions, created fraudulent judicial records. These records were used to execute actions that violated the rights of Rustin and [REDACTED] Wright.
- o **§ 39.02 – Abuse of Judicial Capacity** - Misusing judicial authority to issue orders outside of Parker County's jurisdiction caused substantial harm to Rustin and [REDACTED] Wright, including financial loss, emotional distress, and unwarranted detention.
- o **§ 39.03 – Official Oppression** - Judge Quisenberry's actions, including suppressing testimony, restricting communication, and enforcing void orders, constituted official oppression by infringing upon constitutional and statutory rights.
- o **§ 36.06 – Retaliation** - Sanctions, restrictive orders, and financial penalties were imposed on Rustin Wright as retaliation for his lawful challenges to the court's lack of jurisdiction. These actions were intended to intimidate and discourage him from exercising his legal rights.
- o **§ 22.04 – Injury to a Child** - Actions such as [REDACTED] Wright's detention, separation from his father, and prolonged emotional trauma caused irreparable harm to his psychological and emotional well-being, meeting the statutory criteria for injury to a child.
- o **§ 31.03 – Theft** - Financial penalties, such as amicus attorney fees, were unlawfully enforced under threat of incarceration, constituting theft by coercion. Payments were extracted without lawful authority, causing financial harm to Rustin Wright.
- o **§ 32.46 – Securing Execution of Document by Deception** - Fraudulent orders misrepresenting jurisdiction were used to secure compliance from public institutions, employers, and the Wright family, resulting in the improper execution of void directives.

- o **§ 20.02 – Unlawful Restraint** - [REDACTED] Wright's detention, executed under a void order without valid jurisdiction, unlawfully restricted his liberty, qualifying as unlawful restraint.
- o **§ 20.04 – Aggravated Kidnapping** - [REDACTED] Wright's unlawful detention and forced relocation, coupled with the psychological harm caused by these actions, meet the statutory elements of aggravated kidnapping.
- o **§ 155.001 – Continuing Exclusive Jurisdiction** - Issuing orders in violation of statutory jurisdictional requirements for family law cases.
- o **§ 261.001 – Definition of Abuse**
 - o **§ 261.001(1)(A)** - Judge Graham Quisenberry's detention order for [REDACTED] Wright, which required the minor to be shackled and transported to [REDACTED] Juvenile Detention without valid jurisdiction, directly caused mental and emotional injury to [REDACTED]. This injury resulted in observable and material harm to [REDACTED] psychological well-being, as documented in subsequent professional evaluations. The trauma caused by being placed in detention without justification, coupled with the prolonged separation from his father, inflicted lasting emotional harm, manifesting in documented signs of anxiety, attachment difficulties, and emotional instability.
 - o **§ 261.001(1)(B)** - By knowingly issuing and authorizing the detention order, Judge Quisenberry exposed [REDACTED] **Wright to conditions and circumstances that caused emotional harm** by the act of shackling a minor, transporting him to a juvenile detention facility, and isolating him from both parents created an environment of significant distress and fear. This deliberate action taken in the absence of legal justification or valid jurisdiction, disregarded [REDACTED] emotional well-being and exposed him to unnecessary trauma. It prioritized punitive measures over the child's welfare, exacerbating the harm caused by the court's decisions.
 - o **Additional Context to § 261.001(1)(A) and (B)** - The harm [REDACTED] endured aligns with the statutory definition of abuse, which includes physical or mental injury resulting in observable and material impairment of the child's growth, development, or psychological functioning. Expert evaluations, such as those by Dr. Brooks McKenzie, substantiate the claim that [REDACTED] detention and isolation caused measurable harm. Reports confirm [REDACTED] experienced heightened psychological distress, including fear, loss of confidence in authority figures, and difficulty forming secure attachments due to his treatment by the court.

Federal Laws Violated:

- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Judge Quisenberry's void orders deprived Rustin and [REDACTED] Wright of constitutional rights, including due process and the right to familial association under the guise of judicial authority.
- o **18 U.S.C. § 241 – Conspiracy Against Rights** - Judge Graham Quisenberry, along with other judicial officers and attorneys, conspired to deprive Rustin and [REDACTED] Wright of their constitutional rights to due process, familial association, and equal protection under the law. This was achieved through the systematic issuance and enforcement of void court orders that violated statutory jurisdictional requirements, suppression of [REDACTED] testimony to obstruct critical evidence, and retaliatory actions, including financial penalties and restrictive orders.

- targeting Rustin Wright. These coordinated actions intentionally perpetuated harm, legal confusion, and emotional distress, infringing upon the Wrights' federally protected rights.
- o **18 U.S.C. § 1503 – Obstruction of Justice** - Suppressing evidence, tampering with testimony, and issuing fraudulent orders obstructed the administration of justice in custody proceedings.
 - o **18 U.S.C. § 1346 – Honest Services Fraud** - Corruption or misuse of judicial office to deprive Rustin Wright of honest services through fraudulent judicial actions.
 - o **18 U.S.C. § 1341 – Mail Fraud** - Void orders and related correspondence, such as payment demand and enforcement notices, were sent via mail to perpetuate the harm caused to Rustin and [REDACTED] Wright.
 - o **18 U.S.C. § 1343 – Wire Fraud** - Electronic communications, including emails used to issue or enforce void orders, qualify as wire fraud for facilitating fraudulent actions against Rustin and [REDACTED] Wright.
 - o **18 U.S.C. § 666 – Theft or Bribery Concerning Programs Receiving Federal Funds** - If federal funds supported Parker County's judicial system, detention facilities, or court-related programs, the misuse of jurisdiction and issuance of void orders to collect payments or impose penalties constitutes theft or fraud under this statute.
 - o **18 U.S.C. § 1028 – Fraud and Related Activity in Connection with Identification Documents, Authentication Features, and Information** - Fraudulent court orders issued without jurisdiction serve as unauthorized documents used to falsely authenticate Parker County's authority.
 - o **18 U.S.C. § 371 – Conspiracy to Commit Offense or to Defraud the United States** - Collaboration with other parties to issue void orders, suppress evidence, and enforce penalties constitutes conspiracy to commit federal offenses or defraud the United States.
 - o **18 U.S.C. § 1962 – RICO (Racketeer Influenced and Corrupt Organizations Act)** - The coordinated actions among Judge Graham Quisenberry, other judicial officers, and attorneys to issue and enforce void court orders, suppress evidence, and retaliate against Rustin Wright may constitute a pattern of racketeering activity under RICO. These actions involved predicate offenses, including fraud (enforcement of void orders under false jurisdictional claims), obstruction of justice (suppression of [REDACTED] Wright's testimony), and deprivation of rights (denial of due process and familial association). These acts were part of an organized effort to perpetuate harm, extort payments, and obstruct justice, RICO should apply to address the systemic misconduct.

- **Explanation:**

1. **Fraudulent Court Records** - Judge Quisenberry knowingly issued orders without valid jurisdiction, creating a false judicial record in violation of **Texas Penal Code § 37.10 (Tampering with Governmental Records)**. By presenting these void orders as legally valid, the court misrepresented its authority, further violating **Texas Penal Code § 37.13 (Record of a Fraudulent Court)**. These records were then used to justify punitive actions, including [REDACTED]'s detention and financial sanctions against Rustin Wright, compounding the harm caused.
2. **Exceeding Jurisdiction** - The issuance of orders, including the on or about **September 20, 2019 no contact order** and the on or about **October 3, 2019 detention order**, exceeded the court's jurisdiction under both **Texas Family Code § 155.001 (Continuing Exclusive Jurisdiction)** and **federal due process protections**. These actions disregarded statutory safeguards that ensure jurisdictional authority is clearly established before

issuing binding rulings. By proceeding without jurisdiction, the court undermined the integrity of judicial proceedings and violated the legal rights of Rustin and [REDACTED] Wright.

3. **Emotional Harm to [REDACTED] Wright** - The detention and shackling of [REDACTED] Wright caused significant emotional trauma and distress, **constituting child abuse under Texas Family Code § 261.001 (Definition of Abuse)**. The deliberate exposure of [REDACTED] to harmful and traumatic conditions, without lawful justification, resulted in observable and material impairments to his psychological well-being, including anxiety, loss of trust, and attachment issues as documented in expert evaluations.
 4. **Abuse of Judicial Authority** - Judge Quisenberry misused his judicial position to authorize actions beyond the court's jurisdiction, constituting **abuse of official capacity under Texas Penal Code § 39.02**. This included issuing void orders to enforce punitive actions, such as detention and financial sanctions, while knowingly disregarding statutory and jurisdictional requirements. Such misuse of authority undermines the legitimacy of judicial office and causes direct harm to affected parties.
 5. **Constitutional Violations** - The court's actions deprived [REDACTED] and Rustin Wright of their constitutional rights to due process and familial association. These violations are actionable under **18 U.S.C. § 242 (Deprivation of Rights Under Color of Law)**. The no contact order and detention order unlawfully severed the father-child relationship and imposed punitive measures without adhering to procedural safeguards, causing irreparable harm to both parties.
- **Supporting Evidence:**
 1. **Court Order** - The on or about **October 3, 2019, detention order issued by Judge Quisenberry**, which directed [REDACTED] Wright to be shackled and transported to the Dallas Juvenile Detention Center. **This order, issued without valid jurisdiction, constitutes a fraudulent court record under Texas Penal Code § 37.10 and reflects an abuse of judicial authority.**
 2. **Jurisdictional Filings and Objections** - Legal filings and motions submitted by Rustin Wright explicitly demonstrating Parker County's lack of jurisdiction under Texas Family Code § 155.001. These documents highlight procedural defects in the transfer of jurisdiction from Lamar County to Parker County, rendering the detention order void. Filings and objections filed by Rustin Wright underscore his efforts to challenge the court's lack of authority and the improper issuance of void orders.
 3. **Affidavits and Testimonies** - Testimony from Rustin and [REDACTED] Wright detailing the procedural errors, harm caused by the detention order, and the emotional and financial impact on both Rustin and [REDACTED] Wright.
 4. **Expert Evaluations and Psychological Reports** - Professional evaluations, such as those from Dr. Brooks McKenzie, documenting the significant emotional trauma [REDACTED] Wright experienced as a result of his detention. These reports provide evidence of observable and material impairments to [REDACTED]'s psychological well-being, consistent with the definition of **child abuse under Texas Family Code § 261.001**. Reports confirming that the detention and subsequent institutional placements exacerbated

█████'s anxiety, attachment difficulties, and mistrust of authority figures, further demonstrating the harm caused by the court's actions.

5. **Related Court Records** - Documentation of the on or about **September 20, 2019, no contact order, and subsequent rulings**, which contributed to the ongoing harm caused by the detention order and further isolated █████Wright from his father. Financial sanctions and related orders reinforcing the coercive nature of void proceedings, demonstrating a pattern of judicial misconduct

- **Impact:**

1. **Emotional Harm to █████Wright** - The detention of █████Wright caused significant and documented psychological trauma. Expert evaluations, including those from Dr. Brooks McKenzie, confirm that █████experienced observable impairments in emotional stability, including heightened anxiety, attachment difficulties, and mistrust of authority figures. The trauma from being shackled, transported to a juvenile detention center, and subsequently placed in isolating institutions caused long-lasting harm to █████'s mental health and well-being, as corroborated by professional reports.
2. **Violation of Parental Rights** - The detention order unlawfully interfered with Rustin Wright's parental rights, severing his relationship with his son and denying him the ability to provide emotional and parental support during a critical period. The issuance of a void order by Judge Quisenberry directly deprived Rustin Wright of his constitutional rights to due process and familial association, compounding the emotional harm caused to both father and son.
3. **Prolonged Litigation** - Jurisdictional confusion stemming from the unauthorized transfer of the case from Lamar County to Parker County created delays and extended legal battles. These delays not only prevented timely resolution but also increased financial burdens and emotional stress for the Wright family. Rustin Wright was forced to expend significant resources to challenge void orders and address procedural errors, diverting time and energy that could have been devoted to his relationship with █████.
4. **Erosion of Public Confidence in the Judiciary** - The misuse of judicial authority, issuance of void orders, and suppression of testimony undermined trust in the judiciary's ability to uphold fairness, transparency, and the rule of law. The actions taken in this case highlight systemic issues within the legal system, including failures in oversight, jurisdictional adherence, and ethical accountability, eroding confidence in the integrity of family court proceedings.
5. **Systemic Precedent for Harm** - This case sets a troubling precedent for judicial overreach and the misuse of authority to harm vulnerable individuals. By failing to adhere to statutory and jurisdictional safeguards, the actions demonstrated a disregard for the best interests of children and parental rights, potentially influencing future cases and damaging public trust in family law system.

Allegation 2: Retaliatory Court Actions Against Legal Challenges

- **Specific Action:**
 - Between on or about **April 2019** and on or about **April 2023**, Judge Graham Quisenberry engaged in a pattern of issuing punitive sanctions and restrictive orders targeting Rustin Wright in response to his objections to the court's jurisdiction and procedural misconduct.
 - **These actions included:**
 - **Financial penalties, such as unwarranted sanctions and amicus attorney fees, enforced with the threat of incarceration.**
 - **Restrictions on communication between Rustin Wright and [REDACTED] Wright, effectively severing their relationship.**
 - **Actions intended to intimidate, retaliate, and discourage Wright from continuing to assert his legal rights.**
- **State Laws Violated:**
 - **Texas Penal Code § 36.06 – Retaliation** - Penalizing Wright for exercising his lawful right to challenge jurisdiction constitutes retaliation under this statute.
 - **Texas Penal Code § 39.03 – Official Oppression** - Imposing unjust sanctions and restricting parental communication without legal justification qualifies as misuse of official authority.
 - **Texas Penal Code § 31.03 – Theft** - The collection of financial penalties and fees under threat of incarceration, without jurisdictional authority, constitutes theft.
- **Federal Laws Violated:**
 - **18 U.S.C. § 241 – Conspiracy Against Rights** - Coordinating punitive actions that infringed on Wright's constitutional rights, such as freedom to petition and due process, constitutes a conspiracy under federal law.
 - **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Issuing orders that deprived Wright of constitutional rights, including access to his child and freedom from intimidation, under the guise of lawful authority.
- **Explanation:**
 - **Pattern of Retaliation** - Judge Quisenberry's sanctions and restrictive orders followed Wright's lawful objections to Parker County's lack of jurisdiction. These actions were designed to penalize and discourage further challenges.
 - **Abuse of Authority** - By issuing punitive measures outside the scope of jurisdiction, Judge Quisenberry misused his judicial position to oppress and intimidate.
 - **Intentional Harm** - The sanctions and restrictions imposed financial, emotional, and relational harm on Wright, exacerbating the legal and emotional burden on his family.

- o **Violation of Rights** - The court orders deprived Wright of due process protections, a fair opportunity to assert his legal rights, and meaningful contact with his child, [REDACTED] Wright.
- **Supporting Evidence:**
 - o **Court Transcripts** - Records of hearings where Wright's jurisdictional objections were raised and dismissed, showing a pattern of retaliation in subsequent rulings.
 - o **Sanction Orders** - Orders issued on or about April 5, 2023, imposing financial penalties and restricting communication with [REDACTED] Wright.
 - o **Correspondence and Affidavits** - Documentation from Wright and legal counsel outlining the retaliatory nature of the sanctions and restrictions.
 - o **Financial Records** - Payments made under the threat of incarceration to satisfy unjust sanctions and fees.
- **Impact:**
 - o **Financial Harm** - Wright incurred significant financial losses due to punitive sanctions, including amicus attorney fees enforced with threats of contempt.
 - o **Emotional Distress** - The restrictions on parental communication inflicted emotional harm on both Rustin and [REDACTED] Wright, further destabilizing their relationship.
 - o **Violation of Due Process** - Wright's ability to challenge procedural misconduct was obstructed, undermining his right to a fair and impartial hearing.
 - o **Erosion of Public Trust** - The retaliatory actions of Judge Quisenberry damaged public confidence in the judiciary's ability to act ethically and impartially.

Allegation 3: Tampering with Government Records

- **Specific Action:**
 - o From **2018 to 2023**, Judge Graham Quisenberry knowingly issued multiple court orders that falsely represented Parker County as having proper jurisdiction in family law matters. These records deliberately misrepresented jurisdictional facts, concealing the lack of legal authority required under the Texas Family Code, particularly § 155.001.
 - o These orders included:
 - Temporary restraining orders.
 - Orders appointing an amicus attorney and awarding fees.
 - Custody-related rulings.
 - Contempt judgments and financial penalties.
- **State Laws Violated:**
 - o **Texas Penal Code § 37.10 – Tampering with Government Records** - Issuing orders with knowingly false jurisdictional claims constitutes tampering by creating fraudulent

judicial records. These false records were used to enforce actions, such as detentions and financial penalties.

- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Misusing judicial authority to issue void orders outside the court's jurisdiction, causing harm to [REDACTED] and Rustin Wright through emotional distress, financial penalties, and unwarranted detentions.
 - o **Texas Penal Code § 36.06 – Retaliation** - Retaliating against Rustin Wright for lawful jurisdictional challenges by imposing sanctions and penalties, restricting parental communication, and using court processes to intimidate.
 - o **Texas Penal Code § 36.05 – Tampering with Witnesses** - Suppressing [REDACTED] Wright's testimony and blocking his ability to provide critical evidence violated laws protecting witness integrity.
 - o **Texas Penal Code § 22.04 – Injury to a Child** - Actions such as [REDACTED]'s detention, shackling, and prolonged separation from his father caused documented emotional and psychological harm, constituting injury under this statute.
 - o **Texas Penal Code § 37.13 – Record of a Fraudulent Court** - Issuing orders with false jurisdictional claims created fraudulent judicial records, misrepresenting the legitimacy of Parker County's legal authority.
 - o **Texas Penal Code § 31.03 – Theft** - Collecting payments under void orders, such as amicus fees and contempt fines, constitutes theft because the funds were obtained unlawfully through judicial coercion.
 - o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception** - Misrepresenting jurisdiction in court filings induced reliance on void orders, leading to improper enforcement actions like detentions and financial penalties.
 - o **Texas Penal Code § 20.02 – Unlawful Restraint** - Ordering [REDACTED] Wright's detention and shackling without valid jurisdiction constitutes unlawful restraint by restricting his liberty without legal authority.
 - o **Texas Penal Code § 20.04 – Aggravated Kidnapping** - The detention and forced relocation of [REDACTED] Wright, coupled with psychological harm caused by the unlawful orders, qualifies as aggravated kidnapping.
 - o **Texas Family Code § 155.001 – Continuing Exclusive Jurisdiction** - Issuing orders while knowingly violating jurisdictional requirements contravenes statutory guidelines for family law cases.
 - o **Texas Family Code § 261.001 – Definition of Abuse**
 - **§ 261.001(1)(A):** Causing emotional injury to [REDACTED] Wright through detention and prolonged separation from his father.
 - **§ 261.001(1)(B):** Permitting [REDACTED] to remain in situations causing psychological harm by unlawfully authorizing detentions and restricting communication with his father.
- **Federal Laws Violated:**

- o **18 U.S.C. § 1503 – Obstruction of Justice** - Suppressing evidence, retaliating against jurisdictional objections, and issuing fraudulent orders obstructed the proper administration of justice in custody proceedings.
- o **18 U.S.C. § 241 – Conspiracy Against Rights** - Collaborating with other parties to deprive Rustin and [REDACTED] Wright of their constitutional rights, such as due process, parental relationships, and fair legal proceedings.
- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Using judicial authority to issue void orders deprived Rustin and [REDACTED] Wright of constitutional rights, including due process and family association.
- o **18 U.S.C. § 1341 – Mail Fraud** - Since void orders or related correspondence (e.g., for contempt or amicus fees) were sent via mail, this constitutes mail fraud under federal law.
- o **18 U.S.C. § 1343 – Wire Fraud** - Using electronic communications to transmit void orders or enforce payments qualifies as wire fraud under federal law.
- o **18 U.S.C. § 666 – Theft or Bribery Concerning Programs Receiving Federal Funds** - Since federal funds supported the court or programs involved, misusing those funds through void orders or improper jurisdiction triggers liability under this statute.
- o **18 U.S.C. § 371 – Conspiracy to Commit Offense or to Defraud the United States** - Since Judge Quisenberry conspired with others to issue void orders, collect funds, or obstruct justice, this statute applies.
- **Explanation:**
 - o **Intentional Misrepresentation** - Judge Quisenberry knowingly falsified jurisdictional facts to issue orders under the pretense of lawful authority, despite clear evidence and legal objections demonstrating Parker County’s lack of jurisdiction. This conduct constituted a deliberate creation of fraudulent court records that misled parties, attorneys, and enforcement authorities, resulting in substantial harm.
 - o **Violation of Official Capacity** - As a public servant bound by jurisdictional and statutory limitations, Judge Quisenberry exceeded his lawful authority by issuing orders outside of Parker County’s jurisdiction. This abuse of judicial authority violated Texas Penal Code § 39.02 and undermined the principles of judicial impartiality and accountability.
 - o **Legal and Emotional Consequences** - These fraudulent court records enabled the enforcement of void orders, leading to the unlawful detention of [REDACTED] Wright, unwarranted financial penalties, and restrictions on parental rights. These actions inflicted ongoing emotional and financial harm upon [REDACTED] and Rustin Wright, perpetuating a cycle of injustice and trauma.
- **Supporting Evidence:**
 - o **Court Orders** - Detailed records of all orders issued by Judge Quisenberry between **2018 and 2023**, each reflecting jurisdictional claims contradicted by case facts and legal objections. Examples include:
 - Orders for detention and shackling of [REDACTED] Wright.

- Orders requiring financial payments under threat of incarceration.
- Orders restricting communication between [REDACTED] and Rustin Wright.
- o **Legal Filings** - Objections, motions, and affidavits submitted by Rustin Wright explicitly challenging Parker County's jurisdiction and documenting the harm caused by void orders.
- o **Appellate Court Judgment** - Final judgments, opinion and mandate from the 2nd Court of Appeals declaring all orders issued by Judge Quisenberry in Parker County void for lack of jurisdiction. These rulings confirm that the court's actions were without legal authority.
- **Impact:**
 - o **Emotional Harm** - The prolonged separation from his father caused severe psychological distress and attachment issues for [REDACTED] Wright, as documented in professional evaluations by Dr. Brooks McKenzie and other experts. Rustin Wright also endured emotional trauma due to the violation of his parental rights and prolonged litigation.
 - o **Financial Burden** - Rustin Wright incurred excessive legal expenses in challenging the enforcement of void orders and defending against baseless penalties and sanctions. Payments compelled under void orders, such as those for amicus attorney fees, further exacerbated financial strain.
 - o **Erosion of Trust** - Misrepresentation of jurisdiction undermined public confidence in the judiciary, casting doubt on its ability to uphold fairness, transparency, and accountability.
 - o **Prolonged Litigation** - Fraudulent court records perpetuated unnecessary legal disputes and delays, extending the resolution of custody matters and intensifying the emotional and financial hardship experienced by all parties involved.

Allegation 4: Suppression of Evidence and Testimony

- **Specific Action:**
 - o On or about **January 15, 2020**, Judge Graham Quisenberry willfully suppressed testimony from [REDACTED] Wright, a minor, detailing allegations of emotional and psychological abuse caused by the obstruction of his relationship with his father, Rustin Wright. This suppression prevented the court from considering critical evidence regarding [REDACTED]'s best interests and emotional well-being, directly violating procedural fairness and statutory obligations to prioritize a child's welfare in custody matters.
- **State Laws Violated:**
 - o **Penal Code § 36.05 – Tampering with Witnesses** - Suppressing testimony from [REDACTED] Wright constitutes tampering with a witness, as it involved obstructing the presentation of evidence critical to the custody case.
 - o **Texas Penal Code § 39.03 – Official Oppression** - Judge Quisenberry's actions in denying [REDACTED] Wright the opportunity to testify and in suppressing his allegations of

abuse qualify as official oppression, as they misused judicial authority to harm the rights of [REDACTED] and Rustin Wright.

- o **Texas Penal Code § 37.10 – Tampering with Government Records** - By issuing orders or rulings that omitted or concealed [REDACTED] Wright’s testimony, Judge Quisenberry created and maintained false judicial records that misrepresented the case facts.
- o **Texas Family Code § 153.002 – Best Interest of the Child** - Suppression of evidence regarding [REDACTED] Wright’s emotional needs violated the statutory mandate to prioritize the best interests of the child in custody matters.
- o **Texas Family Code § 261.001 – Definition of Abuse** - By silencing [REDACTED] Wright, Judge Quisenberry enabled continued emotional harm, as [REDACTED] was denied a voice to recount his experiences of abuse and systemic obstruction.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Judge Quisenberry’s actions deprived [REDACTED] and Rustin Wright of constitutional rights, including due process and the ability to present evidence in a court of law, under the guise of judicial authority.
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Suppressing evidence and testimony from [REDACTED] Wright obstructed the proper administration of justice, as it deprived the court of critical information to make informed custody decisions.
- **Explanation:**
 - o **Emotional Suppression of Testimony** - Judge Quisenberry’s decision to suppress [REDACTED] Wright’s testimony was a deliberate act to control the narrative of the case, preventing the court from hearing allegations of emotional harm and systemic obstruction.
 - o **Violation of Judicial Obligations** - As a public servant, Judge Quisenberry was obligated to allow the presentation of all evidence relevant to determining [REDACTED] Wright’s best interests. By suppressing testimony, he violated his duty to uphold fairness and transparency in judicial proceedings.
 - o **Creation of False Records** - The suppression of [REDACTED] Wright’s testimony contributed to the creation of false and incomplete judicial records, which failed to accurately represent the circumstances of the case.
- **Supporting Evidence:**
 - o **Court Transcripts** - Transcripts from the on or about **January 15, 2020**, hearing document objections and rulings related to [REDACTED] Wright’s suppressed testimony.
 - o **Professional Evaluations** - Expert reports, including those by Dr. Brooks McKenzie, highlight the emotional harm experienced by [REDACTED] Wright due to his prolonged separation from his father.
 - o **Orders and Rulings** - Documentation of orders issued by Judge Quisenberry reflects the exclusion of testimony and related evidence.

- **Impact:**

- o **Harm to [REDACTED] Wright** - Silencing [REDACTED] Wright prevented the court from addressing his emotional needs and allegations of abuse, prolonging harm and systemic obstruction of his relationship with his father.
- o **Harm to Rustin Wright** - By suppressing critical evidence, Judge Quisenberry denied Rustin Wright a fair opportunity to defend himself and demonstrate his fitness as a parent, exacerbating emotional distress and financial hardship.
- o **Obstruction of Justice** - The deliberate suppression of testimony obstructed the court's ability to make informed custody decisions, undermining the integrity of the judicial process.
- o **Erosion of Public Trust** - The suppression of key evidence in a custody case undermined confidence in the judiciary's commitment to transparency, fairness, and child welfare.

Allegation 5: Emotional and Psychological Abuse of [REDACTED] Wright

- **Specific Action:**

- o Judge Graham Quisenberry's issuance of void and fraudulent court orders, coupled with his suppression of [REDACTED] Wright's testimony, directly caused emotional and psychological harm to [REDACTED]. Prolonged separation from his father during formative years exacerbated [REDACTED] emotional trauma and attachment issues, as documented by expert evaluations [REDACTED]. Prioritizing procedural manipulation over the welfare of a minor, Judge Quisenberry failed in his fake judicial duty to uphold the child's best interests. Judge Quisenberry's systemic disregard for [REDACTED] welfare culminated in actions that contravened his fake judicial duty to uphold [REDACTED] child's best interests.

- **State Laws Violated:**

- o **Texas Penal Code § 22.04 – Injury to a Child** – By pretending to have judicial authority, Quisenberry's actions caused or permitted emotional and psychological injury to [REDACTED] Wright, resulting in documented harm to his mental and emotional development, as evidenced by psychological evaluations.
- o **Texas Penal Code § 36.05 – Tampering with Witnesses** - By suppressing [REDACTED] testimony about [REDACTED] emotional harm and his relationship with his father, Quisenberry interfered with [REDACTED] ability to provide crucial evidence, constituting tampering with a witness.
- o **Texas Penal Code § 39.03 – Official Oppression** - Judge Quisenberry pretended to have authority to suppress evidence, enforce void orders, and prolong [REDACTED] separation from his father, inflicting emotional harm and violating their rights under the constitution or of law.
- o **Texas Penal Code § 37.10 – Tampering with Government Records** - Fraudulent court orders, falsely assert [REDACTED] jurisdiction, misrepresented the court's authority and perpetuated harm to [REDACTED] and Rustin Wright by creating false judicial records.
- o **Texas Penal Code § 37.10 – Record of a Fraudulent Court** - Orders issued under the guise of proper jurisdiction, despite Parker County lacking authority, qualify as records of a fraudulent court. These orders created an unjust legal framework that perpetuated [REDACTED]'s emotional harm.

- o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception -** Fraudulent orders were [REDACTED] compel compliance with void directives, including restrictions that caused [REDACTED] harm. The court’s misrepresentation of jurisdiction was a deceptive act to secure [REDACTED] cution of these orders.
- o **Texas Penal Code § 31.03 – Theft -** Financial penalties and fees collected under void orders were unjustly extracted, c [REDACTED] nding the financial and emotional burden on Rustin Wright and exacerbating [REDACTED] psychological harm.
- o **Texas Family Code § 153.002 – Best Interest of the Child** [REDACTED] e pretending to have judicial authority, Quisenberry violated his duty to prioritize [REDACTED] best interests by issuing orders that disregarded his emotional welfare and pro [REDACTED] his separation from his father.
- o **Texas Family Code § 261.001 – Definition of Abuse**
 - **§ 261.001(1)(A):** Actions caused mental or emotional injury to [REDACTED] resulting in observable harm to his psychological well-being.
 - **§ 261.001(1)(B):** By permitting prolonged separation and enforcing [REDACTED] ders, Quisenberry created circumstances that inflicted emotional harm on [REDACTED]

• **Federal Laws Violated:**

- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law -** Quisenberry’s use of judicial authority to enforce void orders deprived [REDACTED] nd Rustin Wright of their constitutional rights, including due process and th [REDACTED] to familial association.
- o **18 U.S.C. § 241 – Conspiracy Against Rights –** Since [REDACTED] nberry collaborated with other parties to issue and enforce orders that deprived [REDACTED] and Rustin of their constitutional rights, this constitutes a conspiracy to v [REDACTED] rights.
- o **18 U.S.C. § 1503 – Obstruction of Justice -** Suppressing [REDACTED]’s testimony and issuing void orders interfered with the administration of justice by [REDACTED] ting a fair and impartial determination of custody and welfare issues.
- o **18 U.S.C. § 666 – Theft or Bribery Concerning Programs Receiving Federal Funds -** Since federal funding supported the court, Quisenberry’s misuse of jurisdiction to impose penalties and enforce void orders qualifies as misuse of federally funded resources.
- o **18 U.S.C. § 1341 – Mail Fraud -** Since void orders or related communications were sent [REDACTED] il, this statute applies to the fraudulent use of mail to perpetuate the harm caused to [REDACTED] and Rustin Wright.
- o **18 U.S.C. § 1343 – Wire Fraud -** Since electronic communications, such as emails or other digital transmissions, were used to execute or enfor [REDACTED] orders, this statute applies to the fraudulent use of electronic means to harm [REDACTED] nd Rustin Wright.

• **Explanation:**

- o **Active Obstruction of Parental Relationships -** Quisenberry’s fraudulent judicial orders unlawfully obstructed [REDACTED] Wright’s relationship with his father, Rustin [REDACTED] despite evidence demonstratin [REDACTED] ritical importance of preserving their bond for [REDACTED] emotional and psychological well-being.
- o **Suppression of Key Evidence and Testimony -** By suppressing [REDACTED] testimony regarding the emotional harm he experienced due to prolonged se [REDACTED] n from his father, Quisenb [REDACTED] enced a critical voice in custody proceedings. This deliberate suppression violated [REDACTED] rights to be heard and deni [REDACTED] ed the court crucial evidence to determine his best inte [REDACTED] s mandated by **Texas Family Code § 153.002**.

- o **Psychological Harm and Judicial Misconduct** - Quisenberry's actions resulted in severe psychological trauma for [REDACTED] documented by Dr. Brooks McKenzie's expert evaluation. These actions violated **Texas Penal Code § 22.04 (Injury to a Child)** by causing observable harm to [REDACTED] emotional development. They further violated **Texas Family Code § 261.001**, which defines such harm as abuse, and **18 U.S.C. § 242**, which prohibits the deprivation of rights under color of law.
 - o **Systemic Failures and Judicial Misuse of Authority** - By enforcing void orders and perpetuating baseless custody restrictions, Quisenberry engaged in judicial misconduct under **Texas Penal Code § 39.02 (Abuse of Official Capacity)**. His actions created a fraudulent legal framework, violating **Texas Penal Code § 37.10 (Tampering with Government Records)** and **§ 37.13 (Record of a Fraudulent Court)**, as well as **obstructing justice** under **18 U.S.C. § 1503**.
- **Supporting Evidence:**
 - o **Psychological Evaluation by Dr. Brooks McKenzie** - Dr. McKenzie's expert report details [REDACTED] Wright's emotional trauma, attachment issues, and psychological distress caused by [REDACTED] prolonged and enforced separation from his father.
 - o **Court Transcripts and Testimony** - Transcripts from custody hearings document objections raised by Rustin Wright, [REDACTED] suppressed testimony, and the judicial enforcement of void orders [REDACTED] from [REDACTED] Wright highlight the harmful impact of the court's actions on [REDACTED] welfare.
 - o **Fraudulent Void Orders** - All void orders issued by Judge Quisenberry between 2018 and 2023 serve as evidence of jurisdictional misrepresentation and abuse of judicial authority. These orders include:
 - **Orders mandating [REDACTED] detention and placement in boarding facilities** despite a lack of jurisdiction.
 - **Orders restricting communication between [REDACTED] and Rustin Wright**, directly violating their constitutional rights.
 - o **Appellate Court Rulings** - 2nd Court of Appeals Judgment, Opinion and Mandate voiding all Parker County orders establish a legal foundation for the claims of fraudulent actions and misuse of authority.
 - **Impact:**
 - o **Severe Emotional and Psychological Harm to [REDACTED] Wright** - [REDACTED] suffered documented emotional distress, attachment issues, psychological trauma, exacerbated by his prolonged separation from his father during critical developmental years. This harm aligns with the definitions of child abuse under **Texas Family Code § 261.001** and injury to a child under **Texas Penal Code § 22.04**.
 - o **Financial and Emotional Burden on Rustin Wright** - Rustin Wright incurred significant legal costs and endured emotional distress due to prolonged litigation, enforcement of void orders, and the denial of access to his son.
 - o **Systemic Erosion of Trust** - Judge Quisenberry's actions undermined public confidence in the judiciary by revealing a pattern of misconduct, fraudulent orders, and disregard for statutory and constitutional rights.
 - o **Prolonged Litigation and Jurisdictional Violations** - The fraudulent legal framework delayed the resolution of custody matters, extended emotional and financial hardship, and obstructed justice for [REDACTED] and Rustin Wright.

- o **Deprivation of Constitutional Rights** - [REDACTED] and Rustin Wright's constitutional rights to familial association and due process were systematically violated under **18 U.S.C. § 241** and **18 U.S.C. § 242**.

Summary of Judge Graham Quisenberry's Alleged Violations

1. **Fraudulent Court Orders Without Jurisdiction** - Issued orders while knowingly lacking jurisdiction, and creating fraudulent records that perpetuated legal and emotional harm to [REDACTED] and Rustin Wright.
2. **Retaliatory Court Actions** - Imposed punitive sanctions and restrictive orders against Rustin Wright for objecting to jurisdictional violations, violating **Texas Penal Code § 36.06 (Retaliation)** and **federal statutes protecting constitutional rights**.
3. **Tampering with Government Records** - Created and maintained judicial records with misrepresented jurisdictional claims, violating **Texas Penal Code § 37.10 (Tampering with Government Records)** and **§ 37.13 (Record of a Fraudulent Court)**.
4. **Suppression of Evidence and Testimony** - Suppressed critical testimony from [REDACTED] Wright, silencing his account of emotional harm and obstructing the court from addressing his best interests, in violation of **Texas Penal Code § 36.05 (Tampering with Witnesses)**.
5. **Emotional and Psychological Abuse of [REDACTED] Wright** - Prolonged [REDACTED] Wright's separation from his father, causing documented emotional trauma and attachment issues, as defined under **Texas Family Code § 261.001 (Abuse)** and **Texas Penal Code § 22.04 (Injury to a Child)**.
6. **Fraudulent Collection of Fees and Threats of Incarceration** - Enforced payment of amicus attorney fees under threat of incarceration, misusing judicial authority to extort funds in violation of **Texas Penal Code § 31.03 (Theft)** and **18 U.S.C. § 666 (Theft or Bribery Concerning Programs Receiving Federal Funds)**.
7. **Deprivation of Constitutional Rights** - Engaged in actions that violated [REDACTED] and Rustin Wright's constitutional rights to due process and familial association, as protected under **18 U.S.C. § 242 (Deprivation of Rights Under Color of Law)**.

State Laws Violated:

- o **§ 37.10 – Tampering with Government Records** - Issuing orders misrepresenting jurisdiction constitutes creating false judicial records.
- o **§ 37.13 – Record of a Fraudulent Court** - Issuing void orders knowingly and under the pretense of jurisdiction creates fraudulent court records.
- o **§ 39.02 – Abuse of Official Capacity** - Misusing judicial authority to issue orders outside of Parker County's jurisdiction harmed [REDACTED] and Rustin Wright.
- o **§ 39.03 – Official Oppression** - Suppression of evidence, testimony, and the issuance of harmful orders violated constitutional rights, amounting to official oppression.
- o **§ 36.05 – Tampering with Witnesses** - Suppressing [REDACTED] Wright's testimony and silencing his voice in court proceedings obstructed critical evidence.
- o **§ 36.06 – Retaliation** - Issuing sanctions and restrictive orders against Rustin Wright for lawful jurisdictional objections constitutes retaliation.
- o **§ 22.04 – Injury to a Child** - Prolonged separation from his father, detention, and suppressed testimony caused documented emotional harm to [REDACTED] Wright.

- o **§ 31.03 – Theft** - Collection of fees and financial penalties under void orders constitutes **18 U.S.C. § 1346 – Honest Services Fraud**
As a public official, Judge Quisenberry had a duty to provide fair and impartial rulings. Instead, he engaged in judicial corruption by issuing fraudulent court orders, suppressing evidence, and imposing unlawful financial penalties, depriving Rustin and [REDACTED] Wright of honest legal proceedings. unlawful appropriation of funds.
 - o **§ 32.46 – Securing Execution of Document by Deception** - Fraudulent court orders were used to induce compliance by detention facilities, employers, and others under false pretenses.
 - o **§ 37.09 Texas Penal Code - Tampering with Evidence** - Judge Graham Quisenberry knowingly suppressed key evidence, including [REDACTED] Wright’s testimony and legal filings challenging Parker County’s jurisdiction. By obstructing the presentation of critical information, he altered the judicial record and deprived the complainants of a fair legal process.
 - o **§ 20.02 Texas Penal Code - Unlawful Restraint** - Through void court orders, Judge Quisenberry unlawfully restricted Rustin Wright’s freedom by imposing financial penalties and threats of incarceration. He also facilitated the unlawful restraint of [REDACTED] Wright by preventing reunification with his father, causing undue emotional and psychological harm.
 - o **§ 20.04 – Aggravated Kidnapping - By issuing void judicial order** **Quisenberry facilitated the prolonged and unlawful separation of [REDACTED] Wright from his father. His rulings effectively detained the child in a harmful environment without legal authority, constituting aggravated kidnapping.**
 - o **§ 155.001 – Continuing Exclusive Jurisdiction** - Violating jurisdictional rules by issuing orders where Parker County lacked authority rendered all orders void.
 - o **§ 261.001 – Definition of Abuse** - Actions that caused emotional and psychological harm to [REDACTED] Wright meet the statutory definition of abuse:
 - **§ 261.001(1)(A):** Mental or emotional injury resulting in observable harm.
 - **§ 261.001(1)(B):** Placing [REDACTED] in harmful circumstances causing emotional harm.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Suppression of evidence, tampering with witnesses, and misrepresentation of jurisdiction interfered with justice.
 - o **18 U.S.C. § 241 – Conspiracy Against Rights** - Coordinated efforts to deprive Rustin and [REDACTED] Wright of constitutional rights, such as due process and familial association.
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Issuing void orders and suppressing evidence violated constitutional rights under the pretense of judicial authority.

- o **18 U.S.C. § 666 – Theft or Bribery Concerning Programs Receiving Federal Funds –** Since federal funds supported Parker County’s court operations, misuse of jurisdiction to impose financial penalties or fees constitutes theft of federally supported resources.
- o **18 U.S.C. § 1028 – Fraud and Related Activity in Connection with Identification Documents, Authentication Features, and Information -** Fraudulent court orders were used to validate jurisdiction or enforce actions, qualifying as false documents.
- o **18 U.S.C. § 1341 – Mail Fraud -** Fraudulent orders sent via mail to execute detention or garnishment violate this statute.
- o **18 U.S.C. § 1343 – Wire Fraud -** Use of electronic communications, including emails, to enforce void orders or facilitate fraudulent actions violate this statute.
- o **18 U.S.C. § 1962 – RICO (Racketeer Influenced and Corrupt Organizations Act) -** Quisenberry’s repeated judicial misconduct, including fraudulent orders, obstruction of justice, and financial exploitation, constitutes a pattern of racketeering. By collaborating with attorneys and court officials, he participated in a scheme of judicial corruption designed to manipulate legal outcomes and extract financial gain.

Impact:

1. **Financial Harm -** Rustin Wright incurred exorbitant legal fees due to prolonged and unnecessary litigation caused by void orders and fraudulent jurisdictional rulings. Court-imposed financial penalties, such as amicus fees and contempt fines, were unlawfully enforced, further straining his financial stability.
2. **Emotional Harm -**
 - o **████████ Wright** - Prolonged separation from his father during critical developmental years caused documented psychological distress and attachment issues, as noted in expert evaluations. Unlawful detention and placement in juvenile and boarding facilities subjected him to emotional trauma.
 - o **Rustin Wright** - The denial of parental rights and the prolonged inability to protect or support his son caused significant emotional anguish.
3. **Legal Confusion and Prolonged Litigation -** Fraudulent court orders and jurisdictional misrepresentations resulted in extensive litigation, consuming years of time and escalating costs for all parties. Fraudulent rulings caused delays in custody resolution, perpetuating harm to ██████████ and Rustin Wright.
4. **Harm to Family Relationship** - Prolonged separation caused irreparable damage to the parent-child bond between Rustin and ██████████ Wright, exacerbating the emotional toll on both.
5. **Violation of Justice Principles -** The systemic misuse of judicial authority and the suppression of key evidence undermined the fair administration of justice. Void orders led to enforcement actions that should never have been carried out, such as ██████████’s detention and wage garnishments imposed on Rustin Wright.
6. **Erosion of Public Trust -** The pattern of misconduct, including suppression of evidence, fraudulent orders, and retaliation, undermined public confidence in judicial impartiality, integrity

of family courts and the ability of the legal system to protect children's welfare and parental rights.

7. **Systemic Implications** - The actions taken under void orders highlight broader systemic vulnerabilities in oversight and accountability within the judiciary, necessitating reforms to prevent future misconduct.

Recommended Actions Against Judge Graham Quisenberry

1. **Initiate Criminal Investigation and Prosecution** - Refer this criminal complaint to appropriate law enforcement agencies, including the **Texas Attorney General's Office**, the **Federal Bureau of Investigation (FBI)**, and the **U.S. Department of Justice**, to investigate violations of state and federal laws. **Prosecute substantiated findings to hold Judge Quisenberry accountable for criminal misconduct and deter similar actions by other public officials.**
2. **Recommendation for Immediate Judicial Suspension** - Based on credible evidence of criminal misconduct, recommend that Judge Quisenberry be suspended from all judicial duties pending the outcome of criminal investigations. This action ensures the prevention of further harm and protects the integrity of ongoing judicial proceedings.
3. **Seek Restitution for Harm Caused** - Request that the court mandate restitution for documented harm to Rustin Wright and [REDACTED] Wright, including financial compensation for legal expenses incurred while contesting void orders and damages for emotional and psychological harm caused by the detention order and prolonged separation.
4. **Public Disclosure of Criminal Proceedings and Findings** - Public disclosure of investigative findings and prosecutorial actions. Transparency in addressing judicial misconduct serves to restore public trust in the legal system and demonstrates accountability.
5. **Referral to Oversight Entities for Supporting Action** - While criminal proceedings are initiated, recommend that the complaint be forwarded to the **Texas State Commission on Judicial Conduct** to review violations of judicial ethics under the Texas Code of Judicial Conduct. The commission may impose interim disciplinary measures or provide supporting documentation that complements criminal investigations.
6. **Recommendation for Permanent Disqualification** - Once criminal violations are substantiated, recommend permanent disqualification from judicial office to prevent further misuse of authority. Include provisions to bar Judge Quisenberry from holding future public office involving fiduciary or judicial responsibilities.

2. Administrative Judge David Evans

Allegation: Awareness and Failure to Act on Void Orders

- **Specific Action:**
 - o As the Administrative Judge presiding over the recusal hearings, Judge David Evans was explicitly made aware, through comprehensive legal filings, and courtroom hearings, that all orders issued by Judge Graham Quisenberry in Parker County were void due to the court's lack of jurisdiction. This information was presented to Judge Evans multiple times by the complainant, Rustin Wright, and was substantiated by jurisdictional statutes, case law, and higher court rulings. Despite being fully informed of the jurisdictional defects and the resultant void nature of the orders:

- **Judge Evans refused to grant the motions to recuse Judge Quisenberry**, thereby permitting a judge lacking jurisdiction to continue presiding over the matter and issuing additional void orders.
- **Judge Evans failed to intervene or take any corrective measures**, such as nullifying the void orders, suspending their enforcement, or initiating inquiries into Judge Quisenberry's judicial conduct.
- **Judge Evans' actions and inaction allowed for the continued enforcement of the void orders**, prolonging harm to the complainant and his minor son, [REDACTED] Wright. These harms included wrongful enforcement of custody orders, financial penalties, and emotional trauma resulting from [REDACTED] extended separation from his father.

Judge Evans' refusal to act violated his administrative responsibility to ensure judicial compliance with jurisdictional statutes and procedural fairness.

- **State Laws Violated:**

- o **Texas Penal Code § 39.03 – Official Oppression** - Judge David Evans violated Texas Penal Code § 39.03, which prohibits public servants from intentionally subjecting others to mistreatment or denying their rights under the color of their office. As an administrative judge, Judge Evans had a clear duty to address judicial misconduct and invalidate void orders. Despite being presented with substantial evidence, he knowingly failed to act. His refusal to take corrective measures subjected Rustin and [REDACTED] Wright to ongoing harm, including the enforcement of orders that were legally void. By misusing his authority to uphold these actions, Judge Evans deprived the Wrights of their rights and protections, all under the appearance of lawful authority.
- o **Texas Penal Code § 36.06 – Retaliation** - Judge David Evans' decisions and inactions violated Texas Penal Code § 36.06, which criminalizes acts of retaliation against individuals for exercising lawful rights or exposing wrongdoing. Judge Evans' refusal to nullify void orders, coupled with his adverse rulings during recusal hearings, constituted acts of retaliation against Rustin Wright for raising lawful objections and exposing jurisdictional violations. By fostering an environment that discouraged further legal challenges, his actions sought to suppress accountability and undermine the rightful pursuit of justice by the complainant.
- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Judge David Evans violated Texas Penal Code § 39.02, which prohibits public servants from misusing their official capacity to harm or benefit another. By willfully neglecting his duty to address jurisdictional defects and judicial misconduct, Judge Evans misused his authority as an administrative judge. He permitted the continuation of void orders and shielded criminal, civil, and professional misconduct by other judicial actors. These deliberate actions caused significant harm to Rustin and [REDACTED] Wright by perpetuating an unlawful and unjust legal process, effectively prioritizing procedural convenience over the lawful administration of justice.
- o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception** - Judge David Evans violated Texas Penal Code § 32.46, which prohibits securing the execution of documents by deception, by encouraging, permitting, and failing to correct the filing of

fraudulent motions, orders, and other legal documents that misrepresented jurisdictional facts. These documents were used to perpetuate void orders and maintain control over the custody case in Parker County. By knowingly allowing these misrepresentations to remain on record and enforceable, Judge Evans facilitated the deception of judicial authorities, enforcement agencies, and the parties involved. His actions directly contributed to the unlawful deprivation of Rustin and [REDACTED] Wright's rights under the guise of legitimate judicial authority.

- **Federal Laws Violated:**

- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Judge Evans' refusal to nullify void orders or prevent their enforcement deprived Rustin and [REDACTED] Wright of their constitutional rights to due process, equal protection under the law, and a fair legal proceeding. His actions perpetuated an unjust legal process under the appearance of judicial authority.
- o **Texas Penal Code § 37.10 – Tampering with Government Records** - By allowing fraudulent court orders, documents with no legal effect due to Parker County's lack of jurisdiction, to remain on record and enforceable, Judge Evans permitted the persistence of false government records, further misleading parties, and enforcement agencies.
- o **18 U.S.C. § 241 – Conspiracy Against Rights** - Judge Evans' inaction was part of a broader coordination with Judge Quisenberry and other officials to maintain void orders and obstruct legal challenges, it constitutes a conspiracy to deprive Rustin and [REDACTED] Wright of their constitutional rights.
- o **18 U.S.C. § 1503 – Obstruction of Justice** - Judge Evans' failure to take corrective action obstructed the proper administration of justice by upholding fraudulent orders, suppressing procedural fairness, and perpetuating an unjust legal process.
- o **18 U.S.C. § 1341 – Mail Fraud (Predicate Act Under RICO)** - Judge Evans allowed the use of the mail and electronic communication to file and distribute fraudulent court orders and misrepresentations regarding jurisdiction. These actions were instrumental in advancing the racketeering scheme and maintaining control of the case.
- o **18 U.S.C. § 1343 – Wire Fraud (Predicate Act Under RICO)** - Judge Evans facilitated wire fraud by allowing the use of electronic communication, including e-filing systems, emails, and other digital tools, to file fraudulent motions, orders, and jurisdictional misrepresentations. These electronic submissions were instrumental in advancing the scheme to maintain control over the custody case in Parker County and to suppress Rustin Wright's legal challenges.
- o **18 U.S.C. § 1962(c) – Conducting the Affairs of an Enterprise Through a Pattern of Racketeering Activity** - Judge Evans participated in a pattern of racketeering activity by knowingly aiding and enabling an enterprise, consisting of other judicial and legal officials, that perpetuated procedural misconduct. This misconduct included misrepresentation of jurisdictional facts, obstruction of justice, and retaliation against Rustin Wright for asserting his legal rights. These actions advanced the enterprise's aim of maintaining control over the custody case and suppressing legal challenges.
- o **18 U.S.C. § 1962(d) – Conspiracy to Engage in Racketeering Activity** - Judge Evans conspired with other actors, including Judge Quisenberry and Attorney Stephen Lawrence, to maintain and enforce fraudulent court orders and suppress legal challenges. This conspiracy involved predicate acts such as mail fraud, obstruction of justice, and

retaliatory actions, all forming a pattern of racketeering activity. By failing to address known judicial misconduct and void orders, Judge Evans acted as part of a coordinated effort to deprive Rustin and [REDACTED] Wright of their legal rights.

- **Explanation:**

- o **Failure to Act** - Despite substantial evidence presented through legal filings, and higher court rulings, Judge David Evans failed to take corrective action to address Judge Graham Quisenberry's issuance of void orders due to lack of jurisdiction. His inaction perpetuated the harm caused by these fraudulent orders, which continued to infringe upon Rustin and [REDACTED] Wright's rights.
- o **Complicity in Procedural Injustice** - By refusing to nullify void orders, remove Judge Quisenberry, or otherwise rectify the judicial misconduct, Judge Evans directly undermined procedural integrity and fairness. His inaction not only delayed justice but also allowed the continued enforcement of illegal orders, including those that inflicted emotional and financial harm on Rustin and [REDACTED] Wright.
- o **Breach of Judicial Duty** - As the administrative judge overseeing the recusal hearings, Judge Evans had both the authority and obligation to ensure adherence to legal standards. His failure to intervene or address jurisdictional violations demonstrates a breach of his judicial responsibilities and a disregard for the welfare of those affected by the void orders.
- o **Perpetuation of Harm** - Judge Evans' failure to act prolonged the separation of [REDACTED] Wright from his father, Rustin Wright, causing documented psychological harm to [REDACTED] and significant financial strain on Rustin. His refusal to correct the record or remove Judge Quisenberry compounded these harms by enabling continued misconduct under the guise of judicial authority.

- o **Supporting Evidence:**

- o **Legal Filings** - Numerous filings by Rustin Wright explicitly outlined the jurisdictional defects in Parker County and the harm caused by Judge Quisenberry's orders. These documents were presented during the recusal hearings overseen by Judge Evans.
- o **Recusal Hearing Records** - Court transcripts and official records from the recusal hearings demonstrate that Judge Evans was fully informed of the jurisdictional violations and the resulting harm but failed to take corrective measures.
- o **Higher Court Rulings** - The appellate court's judgment voiding all orders issued in Parker County validates Rustin Wright's objections and confirms that Judge Evans had a duty to address the misconduct during the recusal hearings.
- o **Psychological Evaluations** - Reports documenting [REDACTED] Wright's emotional harm caused by prolonged separation from his father further underscore the consequences of Judge Evans' refusal to act.

Impact

1. **Financial and Emotional Harm** - Judge Evans' failure to address the void orders directly resulted in extended legal battles, leading to excessive legal fees and financial harm to Rustin Wright. The enforcement of void orders exacerbated [REDACTED] Wright's emotional distress due to prolonged

separation from his father. Rustin Wright also suffered significant emotional stress caused by the financial burden and ongoing denial of his parental rights.

2. **Prolonged Enforcement of Void Orders** - By failing to intervene, Judge Evans allowed orders that infringed upon [REDACTED] and Rustin Wright's due process and equal protection rights to remain in effect. Orders that improperly mandated financial penalties, custody restrictions, and even incarceration were enforced under false jurisdiction, perpetuating harm to the Wright family. Judge Evans' refusal to take corrective action prevented timely resolution of jurisdictional disputes, leaving void orders unaddressed and unresolved.
3. **Erosion of Judicial Integrity** - Judge Evans' inaction contributed to the public perception that judicial misconduct and procedural violations can occur without accountability. By ignoring clear jurisdictional defects and failing to correct Judge Quisenberry's misconduct, Judge Evans compromised the foundational principles of fairness and justice in the legal system.
4. **Systemic Harm to the Legal Process** - Judge Evans' refusal to act set a troubling precedent for tolerating judicial overreach and undermined the enforcement of statutory jurisdictional limits. His inaction indirectly supported Judge Quisenberry's continued issuance of void and harmful orders, signaling a lack of consequences for similar behavior.

Recommended Actions Against Judge David Evans

1. **Referral for Criminal Investigation and Prosecution** - Judge David Evans should be referred to the **Texas Attorney General's Office, federal law enforcement agencies**, and any other appropriate authorities for a criminal investigation into his role in enabling the enforcement of void orders. Allegations in this complaint suggest that Judge Evans violated **Texas Penal Code § 39.02 (Abuse of Official Capacity)** by neglecting to act on jurisdictional defects and allowing orders to proceed without legal authority. His inaction also raises concerns under **18 U.S.C. § 242 (Deprivation of Rights Under of Law)**, as his failure to address jurisdictional violations resulted in the denial of Rustin and [REDACTED] Wright's constitutional rights to due process and familial association. When these violations are substantiated, criminal prosecution is necessary to hold Judge Evans accountable and deter similar misconduct in the judiciary.
2. **Recommendation for Suspension Pending Investigation** - To safeguard the integrity of ongoing judicial proceedings and prevent further harm, Judge Evans should be immediately suspended from his judicial and administrative duties. This suspension would remain in effect while criminal and ethical investigations are conducted. Removing Judge Evans from his position during this period ensures he cannot oversee or influence cases connected to the allegations in this complaint. Such an action demonstrates a commitment to fairness, transparency, and the impartial handling of misconduct allegations within the judiciary.
3. **Mandate Public Disclosure of Findings** - All findings from investigations into Judge Evans' conduct should be publicly disclosed to restore confidence in the judiciary and highlight the consequences of judicial misconduct. Transparency is essential in demonstrating how Judge Evans' failure to address jurisdictional defects and void orders violated procedural fairness and constitutional protections. A detailed public report should include the impact of these failures on Rustin and [REDACTED] Wright and outline the steps taken to ensure accountability.
4. **Restitution for Harm Caused** - After investigations confirm misconduct, Judge Evans should be held accountable for restitution to Rustin and [REDACTED] Wright. This restitution should compensate for the

significant harm caused by his inaction, including the financial burden of legal fees incurred to challenge void orders and the emotional trauma endured by █████ Wright due to his prolonged separation from his father. Restitution serves as a necessary remedy for those harmed by judicial misconduct and reinforces the principle of accountability within the legal system.

2. Attorney Stephen Lawrence

Allegation 1: Collusion to Obstruct Justice

- **Specific Action:**
 - o From on or about **September 2019** to on or about **April 2022**, Attorney Stephen Lawrence actively collaborated with Judge Graham Quisenberry to manipulate custody rulings, obstruct justice, and maintain improper jurisdiction in Parker County. Lawrence's actions included participating in pre-arranged rulings that consistently favored Ashley Womack, suppressing critical evidence such as testimony and evidence documenting █████ Wright's emotional harm, and directly influencing custody outcomes that deprived █████ Wright of a meaningful relationship with his father. By blocking admissible evidence and misrepresenting jurisdictional facts, Lawrence prolonged litigation, allowed the enforcement of void orders, and caused significant financial, emotional, and psychological harm to both █████ and Rustin Wright. His deliberate actions undermined procedural fairness, violated statutory obligations to prioritize the child's best interests under Texas Family Code § 153.002, and contributed to documented emotional harm suffered by █████ as supported by expert evaluations. These actions reflect a coordinated effort to obstruct justice and perpetuate harm through systemic abuse of judicial processes.
- **State Laws Violated:**
 - o **§ 37.09 – Tampering with Evidence** – Attorney Lawrence suppressed critical evidence, including testimony, which directly interfered with the proper court's ability to determine custody impartially. This suppression included blocking █████ Wright's testimony about emotional harm and his relationship with his father.
 - o **§ 36.05 – Tampering with Witnesses** - Attorney Lawrence prevented █████ Wright from testifying, silencing critical evidence of emotional harm and the effects of prolonged separation from his father. His actions undermined the valid court's ability to make a fair custody determination.
 - o **§ 22.04 – Injury to a Child** - Attorney Lawrence's actions caused prolonged separation and emotional neglect, leading to documented psychological harm to █████ Wright. The expert evaluation by Dr. Brooks McKenzie confirms the material impairment to █████'s mental health.
 - o **§ 37.10 – Tampering with Government Records** - Attorney Lawrence submitted fraudulent court orders, misrepresented jurisdiction in legal filings, and enforced void directives. These actions created and perpetuated false government records, misinforming the court and all involved parties.

- o **§ 32.46 – Securing Execution of Document by Deception** - Attorney Lawrence misrepresented jurisdictional facts in legal filings and court proceedings to induce reliance on fraudulent court orders, creating legally binding directives under false pretenses.
- o **§ 153.002 – Best Interest of the Child** - Suppressing evidence and prolonging [REDACTED]'s separation from his father violated the statutory requirement to prioritize [REDACTED] Wright's best interests in custody proceedings. This failure directly contravened Texas Family Code standards.
- o **§ 261.001 – Definition of Abuse** - Attorney Lawrence's actions caused prolonged separation and emotional harm to [REDACTED] Wright. This harm aligns with the statutory definition of abuse under **§ 261.001(1)(A) (mental or emotional injury)** and **§ 261.001(1)(B) (exposing the child to harmful circumstances)**.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Attorney Lawrence suppressed evidence, misrepresented jurisdiction, and obstructed fair custody proceedings, interfering with the administration of justice, and denying the court critical information needed for an impartial decision.
 - o **18 U.S.C. § 241 – Conspiracy Against Rights** - Attorney Lawrence collaborated with Graham Quisenberry, Amicus Pettigrew, Ashley Womack and others to deprive Rustin and [REDACTED] Wright of their constitutional rights, including due process and familial association, constituting a conspiracy to violate those rights.
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Attorney Lawrence participated in the use of void court orders to deprive Rustin and [REDACTED] Wright of constitutional rights under the guise of lawful authority, including due process and the right to familial association.
 - o **18 U.S.C. § 1346 – Honest Services Fraud** - Attorney Lawrence manipulated legal proceedings through collusion and suppression of evidence, depriving Rustin Wright of honest legal services and undermining the fairness of the judicial process.
 - o **18 U.S.C. § 1341 – Mail Fraud** - Fraudulent court orders or related communications were sent by mail to enforce void directives, constituting mail fraud under federal law.
 - o **18 U.S.C. § 1343 – Wire Fraud** - Electronic communications, such as emails, were used to transmit fraudulent court orders and suppress evidence, violating federal laws against wire fraud.
- **Explanation:**
 - o Attorney Stephen Lawrence actively obstructed justice by collaborating with Graham Quisenberry, Amicus Pettigrew, and Ashley Womack to manipulate custody outcomes, ignoring the statutory jurisdictional limitations of Parker County. Lawrence played a key role in suppressing critical evidence, including testimony from [REDACTED] Wright and other evidence supporting Rustin Wright's case. These actions undermined procedural fairness and led to fraudulent custody rulings that prioritized Ashley Womack's interests over [REDACTED] Wright's emotional welfare and best interests. By suppressing evidence and

influencing the judicial process, Lawrence violated **Texas Penal Code § 37.09 (Tampering with Evidence)** and **18 U.S.C. § 1503 (Obstruction of Justice)**. His actions directly contributed to the systematic denial of [REDACTED] Wright's relationship with his father and inflicted documented psychological harm on [REDACTED]. This harm is substantiated by professional evaluations highlighting [REDACTED]'s emotional trauma caused by the prolonged separation from his father.

- **Supporting Evidence:**

- o **Court Transcripts:** Records of custody hearings reveal coordinated actions between Attorney Stephen Lawrence, Amicus Attorney Pettigrew, and Judge Graham Quisenberry. These transcripts show rulings and procedural decisions that suppressed critical evidence and testimony supporting Rustin Wright, undermining procedural fairness.
- o **Legal Filings and Objections:** Motions filed by Rustin Wright detail jurisdictional challenges and objections to manipulated rulings. These filings highlight Lawrence's role in suppressing evidence and influencing improper judicial outcomes.
- o **Suppressed Evidence and Testimony:** Documentation and court records indicate that motions, affidavits, and testimony, including [REDACTED] Wright's account of emotional harm and his relationship with his father, were intentionally excluded or disregarded. These omissions directly impacted custody determinations.
- o **Appellate Court Rulings:** 2nd Court of Appeals Judgment, Opinion and Mandate voiding all orders issued in Parker County due to jurisdictional defects substantiate claims of manipulation and procedural misconduct involving Lawrence.

- **Impact:**

- o **Denial of a Fair and Impartial Custody Determination:** Attorney Lawrence's actions, including suppressing evidence and manipulating rulings, directly prevented the proper court from making a custody determination based on [REDACTED] Wright's best interests. This misconduct contributed to unjust outcomes that denied Rustin Wright his parental rights and [REDACTED] Wright a meaningful relationship with his father.
- o **Increased Financial and Emotional Burden:** Prolonged litigation caused by jurisdictional manipulation and suppressed evidence significantly escalated legal expenses for Rustin Wright. The financial strain compounded the emotional toll on both Rustin and [REDACTED] Wright, as they were forced to endure unnecessary delays and barriers to justice.
- o **Psychological Harm to [REDACTED] Wright :** The prolonged separation from his father caused documented psychological trauma and attachment issues for [REDACTED] Wright, as outlined in expert evaluations. Lawrence's role in perpetuating this separation exacerbated the emotional harm inflicted on the minor.
- o **Erosion of Public Trust in Judicial Integrity:** The actions of Attorney Lawrence, in collaboration with Amicus Pettigrew and Judge Quisenberry, undermined public confidence in the judicial process. The appearance of bias, suppression of evidence, and disregard for statutory obligations called into question the integrity of the legal system and its ability to uphold justice.

- o **Obstruction of Procedural Justice:** Lawrence's influence over custody outcomes obstructed the proper administration of justice, delaying the resolution of critical family law matters and perpetuating harm to all parties involved.

Allegation 2: Forgery and Issuance of a Fraudulent Garnishment Order

- **Specific Action:**

- o On or about **May 12, 2022**, Attorney Stephen Lawrence fraudulently signed and issued a garnishment order intended to withhold wages from **Rustin Wright**. Lawrence knowingly signed his name in the section designated for a judge or other authorized issuing official, misrepresenting himself as having judicial authority. The fraudulent garnishment order was then submitted to **MineARC Systems**, Rustin Wright's employer, as a valid legal document, resulting in unauthorized wage deductions.

- **State Laws Violated:**

- o **Texas Penal Code § 32.21 – Forgery** - The act of fraudulently signing the garnishment order and representing it as a legitimate legal document constitutes forgery.
- o **Texas Penal Code § 37.10 – Tampering with Government Records** - By falsifying the garnishment order, Lawrence created and submitted a false government record with intent to defraud.
- o **Texas Penal Code § 37.13 – Record of a Fraudulent Court** - Submitting the fraudulent garnishment order as an official court record constitutes the creation and use of a fraudulent record purporting to be valid under court authority.
- o **Texas Penal Code § 31.03 – Theft** - The unauthorized garnishment of Rustin Wright's wages through deception qualifies as theft under Texas law.
- o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception** - Lawrence's fraudulent signing and submission of the garnishment order to MineARC Systems induced them to execute wage deductions under false pretenses.

- **Federal Laws Violated:**

- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Misrepresenting himself as an official authority to issue the garnishment order deprived Rustin Wright of his property rights under the guise of legal authority.
- o **18 U.S.C. § 1341 – Mail Fraud** - The fraudulent garnishment order or related correspondence was sent via mail; this constitutes mail fraud under federal law.
- o **18 U.S.C. § 1343 – Wire Fraud** - The fraudulent garnishment order or associated communications were sent electronically (e.g., via email), this qualifies as wire fraud.

- **Explanation:**

- o By fraudulently signing the garnishment order and submitting it as a valid court document, Lawrence created a fraudulent record purporting to have judicial authority, violating **Texas Penal Code § 37.13**. Lawrence misrepresented himself as an issuing authority, falsified a government record, and submitted the fraudulent document to induce MineARC Systems to withhold wages unlawfully. The fraudulent garnishment order caused financial harm to Rustin Wright, deprived him of due process rights, and undermined confidence in the legal system's integrity.

- **Supporting Evidence:**

- o Copy of the fraudulent garnishment order signed by Stephen Lawrence.
- o Email correspondence between MineARC Systems and Stephen Lawrence regarding enforcement of the garnishment.
- o Payroll records showing wages unlawfully garnished.
- o Second Court of Appeals decision declaring all Parker County orders void for lack of jurisdiction.

- **Impact:**

- o **Unlawful Financial Harm:** The fraudulent garnishment order resulted in unauthorized wage deductions from Rustin Wright's income, causing direct financial harm and creating additional economic strain during an already prolonged and contentious legal battle.
- o **Violation of Procedural Rights:** By fraudulently issuing and enforcing the garnishment order, Attorney Lawrence deprived Rustin Wright of procedural safeguards, including the opportunity to challenge or rectify the unlawful deductions before they were imposed.
- o **Emotional and Psychological Distress:** The financial harm and procedural violations caused significant emotional and psychological stress for Rustin Wright. The unauthorized garnishment amplified feelings of powerlessness and frustration in navigating a legal system that was clearly biased and corrupt.
- o **Erosion of Judicial and Legal Credibility:** The fraudulent garnishment undermined confidence in the legal and judicial systems by demonstrating a blatant misuse of authority. This act of forgery and its subsequent enforcement raised concerns about the integrity of judicial oversight and ethical standards in legal practice.
- o **Precedent for Misconduct:** The successful execution of the fraudulent garnishment order without immediate accountability set a dangerous precedent for similar acts of legal misconduct, undermining the expectation of accountability and fairness in legal proceedings.

Allegation 3: Suppression of Evidence

- **Specific Action:**

- o From on or about **September 2019** to on or about **April 2022**, during custody hearings, Attorney Stephen Lawrence intentionally suppressed critical documents and testimony that substantiated [REDACTED] Wright's allegations of abuse and affirmed Rustin Wright's fitness as a parent. These materials were pivotal to ensuring a fair adjudication but were deliberately excluded to manipulate the outcome of the proceedings and disadvantage Rustin Wright. The suppression targeted evidence supporting [REDACTED]'s emotional needs, the father-son relationship, and Rustin Wright's parenting capabilities, all while prioritizing procedural tactics over justice and child welfare.

- **State Laws Violated:**

- o **§ 37.09 – Tampering with Evidence** - Suppression and concealment of critical documents and testimony to influence the court's decision constitute tampering with evidence.

- o **§ 36.05 – Tampering with Witnesses** - By actively preventing ██████ Wright’s testimony, Lawrence obstructed ██████’s ability to provide essential evidence, violating this statute.
- o **§ 22.04 – Injury to a Child** - Suppression of evidence that would have prioritized ██████’s best interests caused emotional harm to ██████ violating protections for minors.
- o **§ 153.002 – Best Interest of the Child** - Blocking evidence critical to ██████ Wright’s emotional well-being violated the statutory requirement to prioritize the child’s best interests.
- o **§ 261.001 – Definition of Abuse** - Actions that prolonged ██████’s emotional harm and separation from his father align with the statutory definition of abuse.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Suppressing evidence and testimony obstructed the court’s ability to fairly adjudicate custody matters, interfering with the administration of justice.
 - o **18 U.S.C. § 241 – Conspiracy Against ██████s** - Lawrence collaborated with others to suppress evidence and deny Rustin and ██████ Wright due process.
- **Explanation:**
 - o Attorney Lawrence’s deliberate suppression of key evidence and blocking of ██████ Wright’s testimony constituted an obstruction of justice and tampering with evidence. These actions:
 1. **Denied Critical Information:** Prevented the court from reviewing testimony and documentation essential for an informed decision regarding custody.
 2. **Violated Procedural Fairness:** Obstructed Rustin Wright’s ability to present a complete defense to protect his parental rights.
 3. **Disregarded ██████ Well -Being:** Suppression of evidence showing ██████ emotional harm demonstrated indifference to the statutory mandate of prioritizing his best interests.
 4. **Created Procedural Manipulation:** Allowed custody rulings to be influenced by incomplete or distorted evidence, undermining the integrity of the proceedings.
- **Supporting Evidence:**
 - o **Court Transcripts:** The on or about **March 12, 2021** custody hearing transcripts show Attorney Stephen Lawrence objecting to testimony and evidence relevant to Rustin Wright’s parental fitness and ██████ Wright’s emotional harm. This includes direct challenges to the inclusion of statements from ██████ Wright.
 - o **Motions Filed by Lawrence:** A motion filed on or about **December 2020** by Lawrence objected to affidavits and other evidence submitted by Rustin Wright, including expert evaluations addressing ██████ Wright’s emotional well-being and parental attachment.
 - o **Expert Testimony Excluded:** Motions filed on or about **December 23, 2021**, by Lawrence sought to exclude the testimonies of **Dr. Brooks McKenzie** and **Dr. Jacobie**

Robinson. These experts were expected to provide opinions on the emotional and psychological needs of [REDACTED] Wright, as well as Rustin Wright's parenting capacity.

- **Impact:**

- o **Harm to [REDACTED] Wright** : The suppression of evidence prolonged emotional harm and separation [REDACTED] is father by preventing the court from addressing allegations of abuse.
- o **Harm to Rustin Wright:** Blocking key evidence undermined his legal position and led to unjust custody rulings.
- o **Prolonged Litigation:** The intentional exclusion of evidence increased legal expenses and delayed case resolution.
- o **Erosion of Trust:** Suppression of critical evidence damaged public confidence in the legal system's integrity and its ability to safeguard children's welfare.

Allegation 4: Retaliatory Actions Against Complainant

- **Specific Action:**

- o From on or about **September 2019** to on or about **April 2022**, Attorney Stephen Lawrence filed motions seeking punitive financial sanctions against Rustin Wright. These motions were baseless and lacked legal merit, with the intent to penalize Wright for raising valid jurisdictional challenges in court. The filings were retaliatory in nature and aimed at intimidating Wright to deter him from exercising his legal rights and challenging procedural misconduct.

- **State Laws Violated:**

- o **Texas Penal Code § 36.06 – Retaliation** - Lawrence's motions were intended to harm Rustin Wright financially and intimidate him for participating in lawful court proceedings, including filing jurisdictional objections.
- o **Texas Penal Code § 37.09 – Tampering with Evidence** – The motions included false statements, omitted material facts, and misrepresented evidence so this statute applies as a deliberate attempt to tamper with the presentation of facts in court.

- **Federal Laws Violated:**

- o **18 U.S.C. § 1503 – Obstruction of Justice** - Filing baseless punitive motions interfered with the administration of justice by attempting to discourage Rustin Wright's lawful challenges to jurisdictional overreach.

- **Explanation:**

- o **Retaliatory Intent** - The motions filed by Lawrence were not based on legitimate legal grounds but were instead intended to retaliate against Wright for asserting his legal rights and challenging judicial misconduct.
- o **Obstruction of Justice** - The timing and nature of the filings reflect an effort to obstruct Wright's participation in court proceedings by discouraging further objections and escalating financial strain.

- o **Chilling Effect** - Such retaliatory actions are designed to silence legitimate legal challenges, undermining the fairness and integrity of the judicial process.
- **Supporting Evidence:**
 - o **Punitive Motions:** Copies of motions filed from on or about **September 2019** to on or about **April 2022**, requesting unwarranted financial sanctions.
 - o **Court Transcripts:** Transcripts documenting the connection between Wright's jurisdictional objections and Lawrence's retaliatory filings.
 - o **Legal Filings:** Evidence of misrepresentations or baseless claims in the motions filed by Lawrence.
- **Impact:**
 - o **Financial Harm** - The motions sought to impose financial penalties, causing undue financial hardship for Rustin Wright, and escalating his legal expenses.
 - o **Emotional and Procedural Intimidation** - The retaliatory actions intimidated Wright, creating emotional distress, and discouraging him from pursuing lawful objections.
 - o **Obstruction of Justice** - Misusing legal procedures as a means of retaliation hindered Wright's ability to participate fully in legal proceedings and challenge jurisdictional misconduct.
 - o **Erosion of Judicial Integrity** - Such retaliatory actions undermine public confidence in the fairness of the judicial process and the ethical conduct of attorneys.

Allegation 5: Misrepresentation of Legal Facts

- **Specific Action:**
 - o From on or about **September 2019** to on or about **April 2022**, Attorney Stephen Lawrence knowingly submitted court filings that misrepresented jurisdictional facts to maintain the custody case in Parker County, despite statutory violations of jurisdictional limits. These filings were designed to create the appearance of proper jurisdiction where none existed, enabling further judicial overreach, and undermining procedural integrity. The misrepresented filings resulted in the creation and use of fraudulent court records purporting to be legitimate, violating **Texas Penal Code § 37.13**.
- **State Laws Violated:**
 - o **Texas Penal Code § 37.10 – Tampering with Government Records** - Lawrence knowingly created and filed false government records (jurisdictional filings), which were intended to mislead the court and manipulate the legal process.
 - o **Texas Penal Code § 37.13 – Record of a Fraudulent Court** - By submitting filings with misrepresented jurisdictional facts, Lawrence created and used fraudulent records purporting to be legitimate court documents, violating this statute.
 - o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception** - By misrepresenting jurisdictional facts, Lawrence induced the court and opposing parties to

accept and act upon fraudulent filings, meeting the statutory criteria for securing execution through deception.

- **Federal Laws Violated:**

- o **18 U.S.C. § 1503 – Obstruction of Justice** - Misrepresentation of facts to improperly influence court jurisdiction constitutes obstruction of justice by interfering with the fair administration of proceedings.

- **Explanation:**

- o **Misrepresentation of Jurisdictional Facts** - Lawrence's filings intentionally misstated facts related to jurisdiction. These misrepresentations allowed Parker County to pretend to retain jurisdiction unlawfully, prolonging litigation and denying Rustin Wright and [REDACTED] Wright the fair adjudication of their case.
- o **Falsification of Official Records** - By submitting filings with knowingly false or misleading information, Lawrence created fraudulent court records, **violating § 37.10 and § 37.13**, and undermining the legal system's integrity.
- o **Fraudulent Legal Barriers** - The misrepresented filings not only obstructed justice but also created artificial legal barriers that delayed proper resolution of the custody case, exacerbating emotional and financial harm to the involved parties.

- **Supporting Evidence:**

- o From on or about **September 2019** to on or about **April 2022, Filings** - Court documents submitted by Lawrence that demonstrate misrepresented jurisdictional facts.
- o **Legal Objections** - Objections filed by **Rustin Wright** contesting the jurisdictional inaccuracies.
- o **Judicial Rulings and Orders** - Evidence of subsequent rulings or orders based on the misrepresented filings, contributing to procedural confusion and prolonged litigation.

- **Impact:**

- o **Procedural Confusion** - Misrepresentation of jurisdiction caused delays in custody determinations, prolonging emotional and financial strain on **Rustin Wright** and [REDACTED] Wright.
- o **Financial and Emotional Harm** - Prolonged litigation [REDACTED] significantly increased legal costs and caused emotional distress for **Rustin Wright** and [REDACTED] Wright.
- o **Erosion of Trust** - Manipulating jurisdictional filings [REDACTED] creating fraudulent court records undermined public confidence in the legal system's fairness and the ethical conduct of attorneys.
- o **Obstruction of Legal Remedies** - Prevented timely resolution of the custody case by creating artificial legal barriers to proper adjudication, compounding harm to both Rustin and [REDACTED] Wright.

Allegation 6: Emotional and Psychological Harm to [REDACTED] Wright

- **Specific Action:**

- o Attorney Stephen Lawrence's coordinated efforts to suppress evidence, manipulate rulings, and obstruct justice d caused significant psychological harm to [REDACTED] Wright. His actions prolonged [REDACTED] separation from his father, disregarded [REDACTED] mental, and unalienable [REDACTED] child relationship rights, and failed to address [REDACTED] emotional needs, as documented by Dr. Brooks McKenzie's psychological valuation. Lawrence's actions created an environment where [REDACTED] experienced observable and material impairments in his emotional and psychological development.

- **State Laws Violated:**

- o **Texas Penal Code § 22.04 – Injury to a Child** - Lawrence's actions, including suppress [REDACTED]imony and manipulating custody rulings, caused mental [REDACTED] emotional injury to [REDACTED] Wright. This harm led to documented impairments in [REDACTED] psychological functioning, as confirmed by Dr. Brooks McKenzie's e [REDACTED]
- o **Texas Penal Code § 36.05 – Tampering with Witnesses** - By suppressing [REDACTED] ability to testify in custody proceedings, Lawrence actively prevented the co [REDACTED] hearing critical testimony that would have supported Rustin Wright's case.
- o **Texas Family Code § 261.001 Definition of Abuse** - Under § 261.001, "abuse" includes mental or emotional injury to a child that results in an observable and material impairment in growth [REDACTED] development, or psychological functioning. Lawrence's actions caused such harm to [REDACTED] Wright by prolonging his separation from his father and failing to address his [REDACTED] emotional needs.

- **Federal Laws Violated:**

- o **18 U.S.C. § 241 – Conspiracy Against Rights** - Lawrence collaborated with parties, including Ashley Womack and court officials, to deprive Rustin and [REDACTED] Wright of their constitutional rights, including due process, parental relationship [REDACTED] and access to fair legal proceedings.
- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Lawrence used legal mechanisms, such as fraudulent [REDACTED] orders, to deprive Rustin Wright of wages and custody rights, while neglecting [REDACTED] Wright's emotional welfare, all under the guise of lawful authority.

- **Explanation:**

- o Attorney Lawrence's s [REDACTED] misconduct prioritized the interests of Ashley Womack [REDACTED] the well-being of [REDACTED] Wright. His suppression of evidence, obstruction of [REDACTED] testimony, and manipulation of custody rulings:
 - Silenced [REDACTED] voice in critical proceedings, denying him an opportunity to convey his [REDACTED] experiences and emotional needs.
 - Prolonged [REDACTED] separation from his father, leading to attachment issues and psychological [REDACTED] distress.
 - Created a legal environment where [REDACTED] Wright's emotional well-being was disregarded in favor of procedural t [REDACTED] to secure a favorable outcome for Ashley Womack.
 - Violated the statutory definition [REDACTED] abuse under the Texas Family Code by causing material impairment to [REDACTED] Wright's psychological functioning.

- **Supporting Evidence:**

- o **Psychological Evaluation:**
 - Dr. Brooks McKenzie's evaluation documents [REDACTED] emotional harm, including attachment issues and impaired psychological development caused by prolonged separation from his father.
 - o **Court transcripts and affidavits:**
 - Evidence from custody proceedings showing Lawrence's suppression of [REDACTED]'s testimony and efforts to block evidence favorable to Rustin Wright.
 - o **Legal Filings:**
 - Motions and correspondence demonstrating Lawrence's coordinated actions to manipulate custody outcomes and suppress evidence.
- **Impact:**
 - o **Harm to [REDACTED] Wright** - Long-term emotional and attachment issues. Material impairment to [REDACTED] psychological and emotional development, documented by professional evaluation.
 - o **Harm to Rustin Wright** - Increased financial hardship from prolonged litigation caused by Lawrence's obstruction and manipulation. Emotional distress resulting from being deprived of a meaningful relationship with his son.
 - o **Systemic Harm** - Eroded public trust in the legal system's ability to prioritize the welfare of children in custody disputes. Highlighted systemic failures in addressing a child's emotional and psychological needs during litigation.

Summary of Attorney Stephen Lawrence's Alleged Violations

1. **Collusion to Obstruct Justice** - Collaborated with Amicus Pettigrew and Judge Graham Quisenberry to manipulate custody outcomes favoring Ashley Womack, despite jurisdictional deficiencies in Parker County. Participated in pre-determined rulings, suppressed evidence, and obstructed critical testimony to influence legal proceedings unfairly.
2. **Suppression of Evidence** - Objected to and excluded expert testimonies, and other materials crucial to demonstrating [REDACTED] Wright's emotional harm and Rustin Wright's parental fitness. Prevented the court from hearing relevant testimony, including statements from [REDACTED] Wright, thereby obstructing the presentation of key facts essential to a fair custody determination.
3. **Retaliatory Actions Against Complainant** - Filed punitive motions and sought financial sanctions against Rustin Wright for raising lawful jurisdictional challenges. Used retaliatory legal tactics to intimidate and financially burden the complainant, discouraging further objections to improper court proceedings.
4. **Misrepresentation of Legal Facts** - Filed motions and legal documents that misrepresented jurisdictional facts, creating the false appearance of Parker County's authority over the case. Presented misleading arguments to sustain void orders and obstruct the proper adjudication of custody matters.
5. **Emotional and Psychological Harm to [REDACTED] Wright** - Prolonged [REDACTED] Wright's separation from his father through procedural manipulation, contributing to documented emotional distress and attachment issues. Suppressed evidence of [REDACTED] emotional needs, disregarding the statutory mandate to prioritize the child's best interests.

State Laws Violated:

- **Texas Penal Code:**

- o **§ 37.09 – Tampering with Evidence** - Stephen Lawrence suppressed key evidence, including testimony from Dr. Brooks McKenzie and other relevant materials, that addressed [REDACTED] Wright’s emotional distress and Rustin Wright’s fitness as a parent. This directly interfered with the court’s ability to make informed custody decisions.
 - o **§ 36.06 – Retaliation** - Filing motions with the intent to penalize Rustin Wright for asserting his legal rights and raising valid jurisdictional challenges.
 - o **§ 36.05 – Tampering with Witnesses** - Lawrence obstructed [REDACTED] Wright’s ability to provide testimony regarding his emotional harm and relationship with his father, effectively silencing a critical witness in the custody proceedings.
 - o **§ 22.04 – Injury to a Child** - Lawrence’s suppression of evidence and strategic litigation tactics prolonged [REDACTED] Wright’s separation from his father, contributing to documented psychological harm as outlined in Dr. McKenzie’s evaluations.
 - o **§ 32.21 – Forgery** - Lawrence fraudulently signed and issued a garnishment order, misrepresenting his authority to do so, resulting in unauthorized wage garnishment from Rustin Wright.
 - o **§ 37.10 – Tampering with Government Records** - Lawrence created fraudulent court records, including the garnishment order, and filed jurisdictional misrepresentations that misled the court and opposing parties.
 - o **§ 37.13 – Record of a Fraudulent Court** - Creating and submitting fraudulent court records, including the garnishment order and filings misrepresenting jurisdictional facts, purporting them to be legitimate.
 - o **§ 31.03 – Theft** - The fraudulent garnishment order unlawfully redirected wages from Rustin Wright to unauthorized parties, constituting theft under Texas law.
 - o **§ 32.46 – Securing Execution of Document by Deception** - Lawrence used deceptive legal filings and a fraudulent garnishment order to compel compliance from MineARC Systems, resulting in wrongful wage deductions from Rustin Wright.
 - o **§ 261.001 – Definition of Abuse** - The prolonged emotional harm caused to [REDACTED] Wright by Lawrence’s actions, including suppression of testimony and separation from his father, meets the statutory definition of abuse under § 261.001(1)(A) and § 261.001(1)(B).
- **Federal Laws Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Lawrence’s suppression of evidence and testimony, combined with his actions to misrepresent jurisdictional facts, obstructed the proper administration of justice in the custody case.
 - o **18 U.S.C. § 241 – Conspiracy Against Rights** - Lawrence conspired with other parties to deprive Rustin and [REDACTED] Wright of their constitutional rights, including due process and the right to familial association.

- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - By using void court orders and fraudulent filings, Lawrence infringed upon Rustin Wright’s custody rights and [REDACTED] Wright’s welfare under the guise of lawful authority.
- o **18 U.S.C. § 1346 – Honest Services Fraud** - Attorney Stephen Lawrence engaged in fraudulent and deceptive legal practices that deprived Rustin Wright of fair legal proceedings. By colluding with Judge Graham Quisenberry and other judicial officials, he manipulated court outcomes, and suppressed critical evidence. His deliberate misrepresentation of legal matters, including the concealment of material facts and obstruction of due process, resulted in an unfair legal disadvantage for Rustin Wright. By abusing his role as an officer of the court, Lawrence deprived Wright of his constitutional right to an impartial and just legal process, violating federal laws against honest services fraud.
- o **18 U.S.C. § 1341 – Mail Fraud** - Lawrence utilized the mail system to distribute fraudulent documents, such as the garnishment order, causing financial and emotional harm to Rustin Wright.
- o **18 U.S.C. § 1343 – Wire Fraud** - Electronic communications, including emails, were used by Lawrence to file and enforce fraudulent court orders and wage garnishments, constituting wire fraud.
- o **18 U.S.C. § 1962 – RICO (Racketeer Influenced and Corrupt Organizations Act):** Lawrence’s actions, in coordination with other parties, established a pattern of racketeering activity that involved fraudulent court filings, suppression of evidence, and deprivation of constitutional rights.

Impact:

1. **Financial and Emotional Harm** - Rustin Wright incurred substantial legal fees and costs due to the suppression of critical evidence and prolonged litigation caused by Stephen Lawrence’s procedural tactics and jurisdictional misrepresentations. The suppression of evidence and unjust custody rulings inflicted significant emotional distress on both Rustin Wright and [REDACTED] Wright, exacerbating the psychological harm [REDACTED] experienced from prolonged separation from his father.
2. **Legal Confusion and Prolonged Litigation** - Stephen Lawrence’s deliberate suppression of evidence, coupled with misrepresentations of jurisdictional facts, created unnecessary legal hurdles, increasing litigation time and costs. These actions delayed the resolution of custody disputes and prolonged the emotional toll on Rustin and [REDACTED] Wright. The manipulated proceedings hindered the court’s ability to make an informed, impartial custody determination, perpetuating confusion, and unnecessary procedural disputes.
3. **Erosion of Public Trust** - The systemic misconduct by Stephen Lawrence, including tampering with evidence, suppressing key testimony, and misrepresenting jurisdiction, undermined public confidence in the legal profession’s ability to act ethically and impartially. By prioritizing procedural manipulation over the best interests of [REDACTED] Wright, Lawrence’s actions eroded faith in the judiciary’s ability to protect vulnerable parties in family law cases.

Recommended Actions Against Attorney Stephen Lawrence

1. **Criminal Investigation and Prosecution** - Initiate a criminal investigation to assess Attorney Lawrence's liability for tampering with evidence, retaliation, and obstruction of justice
 2. **Immediate Suspension of Law License** - Immediately suspend Attorney Stephen Lawrence's law license to prevent further misconduct during investigations.
 3. **Referral to the State Bar of Texas** - File a formal complaint with the State Bar of Texas for professional misconduct, ethical violations, and statutory breaches.
 4. **Mandatory Ethical Training** - Require Attorney Lawrence to complete mandatory legal ethics and procedural training to address professional misconduct.
 5. **Restitution for Harm Caused** - Compensate the complainant for financial losses and emotional distress resulting from Attorney Lawrence's actions.
 6. **Public Disclosure of Investigative Findings** - Ensure transparency by publicly releasing the findings of all investigations into Attorney Lawrence's conduct.
-

3. Attorney Robert A. Thornton

Allegation 1: Collusion to Obstruct Justice

- **Specific Action:**
 - o Between on or about **August 15, 2018**, and on or about **September 27, 2019**, when Robert A. Thornton withdrew as counsel, Thornton collaborated with Judge Quisenberry to obstruct justice in custody proceedings involving Rustin and ██████ Wright. Thornton actively participated in and benefited from rulings favorably to Ashley Womack that violated jurisdictional limits under Texas Family Code § 155.001, as evidenced by filings misrepresenting jurisdictional facts to retain Parker County's involvement. Thornton suppressed admissible evidence critical to the custody case, including testimony and documents addressing ██████ Wright's emotional distress and Rustin Wright's parental fitness, as reflected in motions documented during hearings on or about **August 27, 2019**. Thornton filed misleading motions that contributed to procedural delays, enabling issuance of void orders and prolonging litigation. These actions directly harmed ██████ Wright by delaying reunification with his father, causing documented emotional and psychological harm, as not expert evaluations. Thornton's conduct prioritized procedural tactics over ██████'s best interests, violating **Texas Family Code § 153.002** and **obstructing** a fair process.
- **State Laws Violated:**
 - o **Texas Penal Code § 37.09 – Tampering with Evidence** - Thornton suppressed critical evidence, including testimony and documents addressing ██████ Wright's emotional distress and Rustin Wright's parental fitness. By doing so, he impaired the court's ability to make informed custody determinations, constituting tampering under this statute.
 - o **Texas Penal Code § 22.04 – Injury to a Child** - Thornton's actions contributed to ██████ Wright's documented emotional and psychological harm by delaying reunification with

his father. This harm included material impairments to [REDACTED]'s emotional development during critical developmental years.

- o **Texas Penal Code § 37.13 – Record of a Fraudulent Court** - Thornton's collaboration with Judge Quisenberry resulted in void orders that relied on fraudulent court records. These records were created through misrepresented jurisdictional facts and suppression of critical evidence, violating this statute.
- o **Texas Family Code § 153.002 – Best Interest of the Child** - By prioritizing procedural tactics over [REDACTED] Wright's welfare, Thornton violated the statutory obligation to make decisions in the best interest of the child. His actions obstructed evidence central to determining [REDACTED]'s needs and prolonged harmful custody arrangements.
- o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception** - Thornton's filings misrepresented jurisdictional facts, inducing the court to issue void orders based on false premises. This deception meets the criteria of this statute.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 241 – Conspiracy Against Rights** - Thornton collaborated with other parties, including Judge Quisenberry, to deprive Rustin and [REDACTED] Wright of constitutional rights such as due process and familial association. This conspiracy undermined the procedural fairness of the custody proceedings.
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - By suppressing evidence and misrepresenting jurisdictional facts, Thornton obstructed the proper administration of justice. His actions interfered with the court's ability to conduct fair and impartial custody proceedings.
- **Explanation:**
 - o **Collaboration and Favoritism** - Thornton collaborated with Judge Quisenberry to secure rulings that unlawfully favored Ashley Womack. These rulings disregarded statutory jurisdictional limits under Texas Family Code § 155.001 and undermined procedural fairness in the custody case.
 - o **Fraudulent Court Records** - Thornton's misrepresentations contributed to void orders that relied on fraudulent court records. These records misrepresented jurisdictional authority and omitted critical evidence, violating Texas Penal Code § 37.13.
 - o **Suppression of Evidence** - Thornton suppressed key evidence, including testimony and affidavits, that highlighted [REDACTED] Wright's emotional distress and supported Rustin Wright's parental fitness. This suppression impeded the court's ability to make informed custody determinations.
 - o **Misrepresentation of Jurisdictional Facts** - Thornton filed motions containing misrepresented jurisdictional facts, enabling Parker County to retain the case unlawfully. These actions resulted in the issuance of void orders and prolonged procedural delays.
 - o **Harm to [REDACTED] Wright** - Thornton's conduct disregarded [REDACTED]'s emotional welfare, contributing to his prolonged separation from his father during formative years. This separation caused documented psychological harm and attachment issues.

- **Supporting Evidence:**

- o **Court Transcripts** - Transcripts from the on or about **August 27, 2019**, hearing document rulings suppressing admissible evidence favorable to Rustin Wright, including objections by Thornton that hindered the court's access to relevant facts.
- o **Motions Filed by Thornton** - Motions submitted between on or about **August 2018**, and on or about **September 27, 2019**, show objections to evidence related to [REDACTED] Wright's emotional well-being and Rustin Wright's parental fitness.
- o **Jurisdictional Objections** - Legal filings from Rustin Wright include documented objections to Thornton's misrepresented jurisdictional claims, highlighting the procedural flaws and their impact on custody rulings.

- **Impact:**

- o **Harm to [REDACTED] Wright** - Prolonged separation from his father caused emotional and psychological harm to [REDACTED] Wright, as documented by professional evaluations. These delays exacerbated his distress and instability.
- o **Harm to Rustin Wright** - Thornton's suppression of evidence and misrepresentation of jurisdictional facts increased Rustin Wright's legal expenses and emotional distress. These actions created procedural disadvantages and prolonged litigation.
- o **Prolonged Litigation** - Misrepresentation of jurisdictional facts and suppression of evidence delayed the resolution of custody disputes, leading to unnecessary legal confusion and extended emotional harm for all involved.
- o **Erosion of Trust** - Thornton's actions, including collaboration with Judge Quisenberry and suppression of critical evidence, undermined public confidence in the legal system's integrity and ability to ensure impartiality in custody cases.

Allegation 2: Suppression of Evidence

- **Specific Action:**

- o On or about **September 24, 2019**, just days before his withdrawal as counsel on or about **September 27, 2019**, Attorney Robert A. Thornton actively obstructed the admission of critical evidence during custody proceedings, as documented in the on or about **September 24, 2019**, hearing transcript [REDACTED] ton objected to the submission of key materials, including affidavits detailing [REDACTED] Wright's emotional distress and psychological harm caused by his prolo [REDACTED] paration from his father, as well as reports supporting Rustin Wright's parental fitness and rebutting allegations made by Ashley Womack. Motions filed by Thornton in **September 2019** [REDACTED] rm his deliberate opposition to including evidence essential for assessing [REDACTED] best interests, further impeding the court's ability to make an informed decisi [REDACTED] rnton's actions effectively [REDACTED] ssed crucial testimony and documentation that highlighted the harm caused to [REDACTED] and demonstrated Rustin Wright's fitness as a parent, thereby obstructing a fair partial evaluation of the custody matter.

- **State Laws Violated:**

- o **Texas Penal Code § 37.09 – Tampering with Evidence** - Thornton's objections to and suppression of evidence critical to the custody proceedings, including documents and testimony addressing [REDACTED] Wright's emotional welfare and Rustin Wright's parental

fitness, impaired the court's ability to assess all relevant facts. Suppressing or impeding the introduction of such evidence, with the intent to affect the outcome of the case, constitutes tampering under this statute.

- o **Texas Penal Code § 37.13 – Record of a Fraudulent Court** - By opposing the admission of critical evidence and enabling rulings based on incomplete or misleading information, Thornton contributed to the issuance of void orders. These orders relied on a judicial record that lacked necessary evidence, aligning with the definition of a fraudulent court record under this statute.
- o **Texas Family Code § 153.002 – Best Interest of the Child** - Thornton's suppression of evidence central to [REDACTED] Wright's emotional well-being and Rustin Wright's parental fitness undermined the statutory obligation to prioritize the child's best interests in custody matters. By prioritizing procedural maneuvers over [REDACTED]'s welfare, Thornton contravened the guiding principles of the Texas Family Code.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Thornton's deliberate efforts to suppress evidence, including objections to key documentation and testimony, interfered with the proper administration of justice. By impeding the court's ability to consider all pertinent facts, Thornton obstructed the fair adjudication of custody and parental rights, violating this federal statute.
- **Explanation:**
 - o **Deliberate Suppression:** Thornton actively opposed the admission of critical evidence, including testimony and documents addressing [REDACTED] Wright's emotional distress and Rustin Wright's parental fitness. This exclusion of evidence directly impaired the court's ability to assess the true circumstances, leading to uninformed and unjust custody rulings.
 - o **Violation of Procedural Fairness:** Thornton's objections and filings obstructed the presentation of crucial evidence, denying Rustin Wright the opportunity to present a complete and fair case. This conduct undermined procedural integrity and the principles of due process, distorting the court's understanding of the facts.
 - o **Fraudulent Court Records:** By suppressing key evidence and facilitating rulings based on incomplete information, Thornton contributed to judicial decisions and court records that did not reflect the full facts of the case. These actions align with the definition of fraudulent court records under Texas Penal Code § 37.13.
 - o **Disregard for [REDACTED]'s Welfare:** Thornton's actions ignored the statutory mandate to prioritize the child's best interests. The suppressed evidence was essential to addressing [REDACTED] Wright's psychological distress and ensuring custody decisions were made with his emotional and developmental needs in mind.
- **Supporting Evidence:**
 - o **Court Transcripts** - Transcripts from the September 24, 2019, hearing document Thornton's objections to the admission of key evidence, including testimony and documents relevant to [REDACTED] Wright's emotional well-being and Rustin Wright's parental fitness.

- o **Filed Motions and Correspondence** - Legal filings by Thornton, submitted between on or about **August 15, 2018**, and on or about **September 27, 2019**, reflect objections to the inclusion of evidence addressing █████ Wright's emotional welfare and Rustin Wright's capacity as a parent. These filings highlight Thornton's role in obstructing the presentation of critical facts during custody proceedings.
- o **Jurisdictional Challenges** - Documents filed by Rustin Wright during this period demonstrate his attempts to address jurisdictional violations, which Thornton opposed through procedural motions and objections aimed at sustaining Parker County's control over the case.
- **Impact:**
 - o **Harm to Rustin Wright** - Thornton's actions denied Rustin the ability to refute allegations against him and present evidence supporting his parental fitness. This led to unjust custody determinations, increased legal expenses, and extended litigation.
 - o **Harm to █████ Wright** - Suppression of evidence delayed resolution of abuse allegations, prolonging █████'s separation from his father and compounding his emotional harm.
 - o **Judicial Misconduct and Loss of Integrity** - Thornton's suppression of evidence eroded trust in the judicial process, creating the perception of bias and undermining public confidence in the court's ability to ensure fairness.

Allegation 3: Retaliatory Actions Against Complainant

- **Specific Action:**
 - o Between about **April 2019** and on or about **September 27, 2019**, Attorney Robert Thornton filed punitive motions aimed at imposing financial sanctions against **Rustin Wright**.
 - o These motions were directly linked to Wright's lawful objections challenging the court's jurisdiction and exposing procedural misconduct.
 - o Thornton's actions were retaliatory in nature, designed to intimidate Wright and discourage further legal challenges to the court's authority.
- **State Laws Violated:**
 - o **Texas Penal Code § 36.06 – Retaliation** - Thornton's motions sought to harm Wright financially in retaliation for his lawful participation in court proceedings, including raising jurisdictional objections.
 - o **Texas Penal Code § 37.13 – Record of a Fraudulent Court** - Thornton's retaliatory filings contributed to the creation of fraudulent court records by inducing the court to issue void and biased rulings that lacked factual and legal basis.
 - o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception** - If Thornton's motions included false or misleading statements, this statute applies, as they were intended to induce the court to impose sanctions improperly.

- o **Texas Family Code § 153.002 – Best Interest of the Child** - Thornton's actions diverted attention from [REDACTED] Wright's welfare and focused instead on penalizing Wright for procedural objections, violating the child-centered principles of family law.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Filing baseless and punitive motions to deter Wright from pursuing lawful challenges interfered with the proper administration of justice.
- **Explanation:**
 - o **Retaliatory Intent** - Thornton's motions were not grounded in legitimate legal arguments but were instead designed to retaliate against Wright for asserting jurisdictional challenges and exposing procedural flaws.
 - o **Suppression of Procedural Fairness** - By filing punitive motions, Thornton created a chilling effect, discouraging Wright from continuing to raise lawful objections critical to the custody case's proper adjudication.
 - o **Fraudulent Court Records:** Thornton's punitive filings contributed to the issuance of rulings based on retaliatory rather than factual grounds, violating **Texas Penal Code § 37.13**.
 - o **Neglect of [REDACTED] Wright's Welfare** - Thornton's retaliatory actions diverted the court's focus from [REDACTED] Wright's emotional and psychological needs, undermining decisions made in the child's best interests.
- **Supporting Evidence:**
 - o **Court Filings** - Filings dated on or about **July 10, 2019**, and on or about **August 15, 2019**, demonstrate Thornton's efforts to impose financial sanctions on Wright.
 - o **Correspondence and Objections** - Emails and court records link these motions to Wright's jurisdictional objections, illustrating their retaliatory nature.
 - o **Court Transcripts** - Transcripts from hearings where these motions were argued provide additional context regarding their intent and impact.
- **Impact:**
 - o **Harm to Rustin Wright** - Thornton's motions imposed financial hardship on Wright, escalating legal expenses and creating emotional stress.
 - o **Suppression of Legal Challenges** - The retaliatory motions discouraged Wright from continuing to raise legitimate jurisdictional objections, undermining his ability to seek procedural fairness.
 - o **Harm to [REDACTED] Wright** - The focus on punitive measures against Wright distracted from addressing [REDACTED] s emotional well-being and ensuring decisions were made in his best interests.
 - o **Erosion of Judicial Integrity** - Thornton's actions undermined public confidence in the court's ability to ensure impartiality and protect participants from retaliation.

Allegation 4: Misrepresentation of Legal Facts

- **Specific Action:**
 - On or about **August 27, 2019**, Attorney Robert Thornton submitted legal filings that deliberately misrepresented jurisdictional facts, claiming Parker County had valid jurisdiction over the custody case. These filings contradicted statutory requirements under **Texas Family Code § 155.001**, which outlines jurisdictional limits in custody cases, and ignored filings and objections by Rustin Wright that demonstrated jurisdiction lay elsewhere.
- **State Laws Violated:**
 - **Texas Penal Code § 37.10 – Tampering with Government Records** - Thornton knowingly submitted filings containing false or misleading information, creating fraudulent court records to sustain Parker County’s jurisdiction unlawfully.
 - **Texas Penal Code § 32.46 – Securing Execution of Document by Deception** - Thornton’s filings induced the court to issue void orders based on misrepresented facts, meeting the statutory criteria for securing execution of a document through deception.
 - **Texas Penal Code § 37.13 – Record of a Fraudulent Court** - By submitting filings with knowingly false information, Thornton contributed to creating fraudulent court records under **Texas Penal Code § 37.13**, causing the issuance of void rulings.
 - **Texas Family Code § 153.002 – Best Interest of the Child** - Thornton’s misrepresentation of jurisdictional facts delayed decisions critical to [REDACTED] Wright’s well-being, violating the statutory obligation to prioritize the child’s best interests in custody matters.
 - **Texas Family Code § 261.001 – Definition of Child Abuse**
Thornton’s misrepresentations contributed to [REDACTED]’s prolonged separation from his father, resulting in emotional harm as defined in **§ 261.001**:
 - **§ 261.001(1)(A):** Causing observable and material impairment to [REDACTED] growth, development, and psychological well-being.
 - **§ 261.001(1)(B):** Permitting [REDACTED] remain in a harmful situation by enabling prolonged separation.
- **Federal Laws Violated:**
 - **18 U.S.C. § 1503 – Obstruction of Justice** - Filing documents with false jurisdictional claims impeded the fair administration of justice by influencing court proceedings unlawfully.
- **Explanation:**
 - **Deliberate Misrepresentation:** Thornton’s filings were designed to mislead the court into retaining jurisdiction in Parker County, despite clear statutory violations under **Texas Family Code § 155.001**.

- o **Fraudulent Court Records:** Misrepresenting jurisdictional facts created fraudulent legal documents that resulted in void orders, contravening **Texas Penal Code § 37.13**.
- o **Impact on Judicial Decisions** - The court relied on Thornton's filings to issue rulings and orders that were ultimately void due to lack of jurisdiction. This misrepresentation created significant procedural delays and confusion, obstructing the proper adjudication of the custody case.
- o **Violation of [REDACTED] Wright's Best Interests** - Thornton's actions diverted focus from [REDACTED]'s emotional welfare by prolonging jurisdictional disputes, violating **Texas Family Code § 153.002**, which mandates prioritizing the child's best interests in custody matters.
- o **Child Abuse Under Texas Family Code § 261.001** - By enabling prolonged separation from his father and obstructing decisions that could have resolved [REDACTED]'s custody situation, Thornton's actions contributed to:
 - **Mental or Emotional Injury (§ 261.001(1)(A)):** Thornton's conduct resulted in documented emotional and psychological harm to [REDACTED] including observable impairments to his mental health and development.
 - **Permitting Mental or Emotional Injury (§ 261.001(1)(B)):** Thornton's role in sustaining void orders and delaying custody resolutions placed [REDACTED] in a harmful situation that caused significant emotional distress.
- **Supporting Evidence:**
 - o **Jurisdictional Filings** - Documents submitted by Thornton on or about **August 27, 2019**, that falsely claimed Parker County's jurisdiction, in direct violation of **Texas Family Code § 155.001**. These filings contributed to procedural delays, prolonging [REDACTED] Wright's separation from his father and causing significant emotional distress, aligning with **Texas Family Code § 261.001(1)(A) and (B)**.
 - o **Objections and Affidavits** - Legal objections and affidavits submitted by **Rustin Wright** challenging Thornton's misrepresented jurisdictional claims. These filings emphasized the emotional and psychological harm caused to [REDACTED] Wright due to the prolonged custody dispute.
 - o **Court Rulings and Orders** - Orders issued by the court, based on Thornton's misrepresented claims of jurisdiction, were later challenged as void. These orders enabled [REDACTED]'s continued separation from his father, contributing to his documented emotional harm as defined under **§ 261.001**.
 - o **Correspondence** - Emails or other communications demonstrating Thornton's advocacy for Parker County's jurisdiction despite evidence to the contrary. This correspondence illustrates Thornton's role in creating a situation that caused [REDACTED] observable and material emotional injury, meeting the criteria for child abuse under **§ 261.001(1)(A) and (B)**.
- **Impact:**
 - o **Harm to Rustin Wright** - Thornton's actions delayed the resolution of custody matters, increasing legal costs and creating emotional stress for Rustin Wright.

- o **Harm to [REDACTED] Wright** - Prolonged separation from his father caused documented emotional and psychological harm, as delays exacerbated his distress and instability.
- o **Procedural Confusion** - Misrepresentation of jurisdiction created significant legal confusion, leading to prolonged litigation and unnecessary hearings to address jurisdictional disputes.
- o **Erosion of Public Trust** - Thornton's deliberate manipulation of jurisdictional facts undermined confidence in the legal system's ability to ensure transparency and fairness.

Allegation 5: Emotional and Psychological Harm to [REDACTED] Wright

- **Specific Action:**

- o Between on or about **August 15, 2018**, and on or about **September 27, 2019**, Attorney Robert Thornton's actions contributed directly to the prolonged emotional and psychological harm of [REDACTED] Wright by:
 - Suppressing evidence that demonstrated [REDACTED] emotional distress and need for a stable parental relationship.
 - Obstructing justice through misrepresentation of jurisdictional facts and enabling void orders to remain in effect.
 - Disregarding [REDACTED] best interests, as documented by expert evaluations and testimony.

Thornton's conduct prolonged [REDACTED] separation from his father, ignoring statutory obligations to prioritize the child's welfare under **Texas Family Code § 153.002**.

- **State Laws Violated:**

- o **Texas Penal Code § 22.04 – Injury to a Child** - Thornton's actions caused or contributed to mental and emotional injury to [REDACTED] Wright, resulting in observable and material impairments to his psychological development, as documented by professional evaluations.
- o **Texas Penal Code § 37.09 – Tampering with Evidence** - Thornton's suppression of evidence related to [REDACTED]'s well-being prevented the court from making informed decisions, constituting tampering under this statute.
- o **Texas Penal Code § 37.13 – Record of a Fraudulent Court** - Thornton's participation in creating and maintaining void orders contributed to a fraudulent legal record that prolonged [REDACTED] separation from his father.
- o **Texas Family Code § 153.002 – Best Interest of the Child** - By disregarding evidence critical to [REDACTED] welfare, Thornton failed to uphold the statutory requirement to prioritize [REDACTED]'s best interests in custody decisions.
- o **Texas Family Code § 261.001 – Definition of Abuse** - Thornton's actions contributed to [REDACTED]'s prolonged separation from his father, resulting in emotional harm as defined in **§ 261.001**:
 - **§ 261.001(1)(A):** Causing observable and material impairment to [REDACTED] growth, development, and psychological well-being.
 - **§ 261.001(1)(B):** Permitting [REDACTED] to remain in a harmful situation by enabling prolonged separation.

- **Federal Laws Violated:**

- o **18 U.S.C. § 2385 – Conspiracy Against Rights** - Collaborating with other parties to deprive [REDACTED] of his constitutional rights, including access to his father and due process protection constitutes a federal violation.

- **Explanation:**

- o **Prolonged Separation** - Thornton's actions directly contributed to delaying reunification between [REDACTED] and his father during critical developmental years, exacerbating the child's psychological harm.
- o **Suppression of Evidence** - Key evidence demonstrating [REDACTED] emotional distress and Rustin Wright's parental fitness was suppressed or excluded to Thorntons motions and objections. This suppression hindered the court's ability to address [REDACTED] needs.
- o **Enabling Void Orders** - Thornton's misrepresentation of jurisdiction allowed void orders to remain in place, prolonging the legal process and harming [REDACTED] emotional stability.
- o **Failure to Prioritize the Child's Best Interests:** Thornton's conduct violated the statutory mandate to ensure decisions are made in the best interest of the child.

- **Supporting Evidence:**

- o **Psychological Evaluation - Dr. Brooks McKenzie's expert report** documenting [REDACTED] Wright's emotional harm, attachment issues, and psychological distress caused by separation from his father.
- o **Court Transcripts** - Transcripts from mid-2019 hearings, detailing Thornton's objections to evidence submission and his role in suppressing critical testimony.
- o **Motions and Filings** - Legal filings submitted by Thornton that blocked the inclusion of evidence related to [REDACTED]'s well-being and Rustin Wright's parental fitness.
- o **Affidavits** - Statements from Rustin Wright and other witnesses highlighting the emotional and psychological harm experienced by [REDACTED] due to Thornton's legal strategies.

- **Impact:**

- o **Harm to [REDACTED] Wright** - Thornton's actions caused significant psychological harm, as documented by expert evaluations, by prolonging [REDACTED] separation from his father during formative years. This separation created instability and attachment issues, impacting [REDACTED] development and well-being.
- o **Harm to Rustin Wright** - Thornton's suppression of evidence and procedural delays created emotional stress and financial strain for Rustin Wright, further destabilizing [REDACTED]'s environment.
- o **Systemic Harm** - Thornton's disregard for [REDACTED] best interests and collaboration in enabling void orders undermined public confidence in the court's ability to prioritize child welfare.

Summary of Attorney Robert A. Thornton's Alleged Violations

- **Collusion to Obstruct Justice (on or about August 15, 2018 until on or about September 27, 2019)** - Thornton collaborated with Judge Graham Quisenberry to obstruct justice by supporting

void orders, suppressing critical evidence, and misrepresenting jurisdictional facts. These actions undermined procedural fairness and harmed [REDACTED] Wright by delaying custody resolutions.

- **Suppression of Evidence (on or about the September 24, 2019 hearing)** - During a critical hearing, Thornton opposed the admission of key evidence, including documentation of [REDACTED] Wright's emotional distress and Rustin Wright's parental fitness. This suppression impaired the court's ability to make informed decisions.
- **Retaliatory Actions Against Complainant (on or about April 2019 – on or about September 2019)** - Thornton filed punitive motions, such as financial sanctions, targeting Rustin Wright in retaliation for raising valid jurisdictional objections. These actions discouraged Wright from pursuing lawful challenges and increased his financial burden.
- **Misrepresentation of Legal Facts (on or about August 27, 2019)** - Thornton submitted filings misrepresenting jurisdictional facts, claiming Parker County had valid authority over the case, in violation of **Texas Family Code § 155.001**. These filings enabled the issuance of void orders and procedural delays.
- **Emotional and Psychological Harm to [REDACTED] Wright (on or about August 15, 2018 – on or about September 27, 2019)** - Thornton's suppression of evidence, obstruction of justice, and misrepresentation of jurisdictional facts contributed to [REDACTED] emotional and psychological harm. Prolonged separation from his father caused documented distress and attachment issues, as confirmed by professional evaluations.
- **State Laws Violated:**
 - **§ 37.09 – Tampering with Evidence** - Relevant to Thornton's suppression of critical evidence, including documentation of [REDACTED] Wright's emotional distress and Rustin Wright's parental fitness, which impaired the court's ability to make informed custody determinations.
 - **§ 22.04 – Injury to a Child** - Thornton's actions contributed to [REDACTED] Wright's emotional and psychological harm, causing material impairments to his mental health during critical developmental years.
 - **§ 36.06 – Retaliation** - Filing punitive motions targeting Rustin Wright in retaliation for raising valid jurisdictional objections violated protections against retaliatory actions in legal proceedings.
 - **§ 32.46 – Securing Execution of Document by Deception** - Thornton's misrepresentation of jurisdictional facts in court filings induced the court to issue void orders, which were executed under false pretenses.
 - **§ 37.10 – Tampering with Government Records** - Misrepresentation of jurisdictional facts in legal filings constitutes tampering with government records by creating false judicial documents.
 - **§ 37.13 – Record of a Fraudulent Court:** Thornton's filings knowingly misrepresented facts, creating fraudulent legal records that were relied upon by the court to issue void or legally unauthorized rulings.
 - **§ 153.002 – Best Interest of the Child** - Thornton's actions violated the statutory obligation to prioritize [REDACTED] Wright's welfare by suppressing evidence and enabling procedural delays.

- o **§ 261.001 – Definition of Abuse**
 - **§ 261.001(1)(A):** Thornton’s actions contributed to **mental or emotional injury** that resulted in observable harm to [REDACTED] growth, development, and psychological well-being.
 - **§ 261.001(1)(B):** By enabling prolonged separation and ignoring [REDACTED] emotional needs, Thornton permitted [REDACTED] to remain in a situation causing emotional harm.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Thornton’s suppression of evidence and filing of misleading motions obstructed the proper administration of justice.
 - o **18 U.S.C. § 241 – Conspiracy Against Rights** - Collaboration with other parties to deprive Rustin and [REDACTED] Wright of constitutional rights, such as due process and access to parental relationships.
 - o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - Using legal mechanisms to manipulate custody proceedings and harm Rustin and [REDACTED] Wright under the guise of lawful authority.

Impact:

1. **Financial and Emotional Harm** - Rustin Wright incurred significant legal fees and emotional distress due to Thornton’s suppression of evidence, misrepresentation of jurisdiction, and retaliatory motions. These actions caused [REDACTED] Wright prolonged emotional and psychological harm, documented by expert evaluations as observable impairments to his mental health, consistent with the definition of child abuse under **Texas Family Code § 261.001**.
 - o **Specific Example:** Suppression of evidence critical to custody determinations directly increased litigation costs and prolonged Rustin Wright’s financial hardship.
2. **Legal Confusion and Prolonged Litigation** - Thornton’s misrepresentation of jurisdictional facts, suppression of key evidence, and participation in void orders delayed the resolution of the custody case, complicating legal proceedings and increasing litigation expenses.
 - o **Specific Impact on [REDACTED] Wright** : These delays prolonged [REDACTED] separation from his father during critical developmental years, exacerbating his emotional harm and attachment issues as documented in professional evaluations.
3. **Violation of Child Welfare Principles** - Thornton’s actions directly contravened **Texas Family Code § 153.002**, which mandates prioritizing the child’s best interests.
 - o **Specific Violations:**
 - Suppression of evidence related to [REDACTED] emotional well-being delayed appropriate custody decisions.
 - Prolonged separation from his father resulted in harm consistent with the statutory definition of child abuse under **Texas Family Code § 261.001**.
4. **Erosion of Public Trust** - Thornton’s misconduct, including misrepresentation of jurisdiction and suppression of evidence, undermined public confidence in:
 - o The ethical standards of the legal profession.
 - o The judiciary’s ability to fairly adjudicate custody cases and prioritize child welfare.
 - o **Specific Example:** Rulings based on Thornton’s misrepresented filings and suppression of evidence created a perception of bias and procedural unfairness.

5. **Systemic Harm from Fraudulent Records** - Thornton's actions align with violations under **Texas Penal Code § 37.13 – Record of a Fraudulent Court**, where fraudulent legal filings created a foundation for void court orders. These actions obstructed justice, prolonged litigation, and contributed to harm against both [REDACTED] and Rustin Wright.

Recommended Actions Against Attorney Robert A. Thornton

1. **Criminal Investigation and Prosecution** - Initiate a criminal investigation into Thornton's actions.
2. **Restitution for Harm Caused** - Compensate **Rustin Wright** [REDACTED] financial losses and emotional distress. Additionally, provide restitution for harm caused to [REDACTED] **Wright** due to the prolonged separation from his father and psychological harm.
3. **Public Disclosure of Investigative Findings** - Ensure transparency and accountability by publicly releasing the findings of the investigation into Thornton's conduct and provide a detailed summary of actions taken to address misconduct, reinforcing public trust in the legal system and the disciplinary process
4. **Immediate Suspension of Law License** - Suspend Thornton's law license pending the outcome of investigations into allegations of ethical violations, statutory misconduct (e.g., tampering with evidence, retaliation, misrepresentation of jurisdictional facts), and violations of child welfare laws under **Texas Family Code § 153.002** and **§ 261.001**.
5. **Referral to the State Bar of Texas** - File a formal complaint with the State Bar of Texas citing specific breaches of the **Texas Disciplinary Rules of Professional Conduct**, including:
 - a. Suppression of evidence critical to custody determinations.
 - b. Misrepresentation of jurisdictional facts to sustain void orders.
 - c. Retaliatory motions for raising legitimate legal objections.
6. **Mandatory Legal Ethics Training** - Require Thornton to complete a rigorous program on legal ethics and professional responsibility, with a focus on:
 - a. The ethical obligations of attorneys in custody cases.
 - b. Child welfare principles as outlined under Texas law and the **ABA Model Rules of Professional Conduct**.

4. Amicus Attorney Zachary Q. Pettigrew

Allegation 1: Unauthorized Appointment and Financial Misconduct

- Specific Action:
 - o From on or about **August 28, 2019** to on or about **June 7, 2021**, Amicus Attorney Zachary Q. Pettigrew acted as an Amicus Attorney within this case. He was never legally appointed to the case because all orders issued in Parker County during the relevant timeframe were declared void due to lack of jurisdiction. Despite the invalidity of his appointment, Pettigrew continued to act in his capacity as Amicus Attorney, enforcing multiple void orders signed by Judge Graham Quisenberry and demanding payments from the complainant, Rustin Wright, totaling an estimated **\$14,879.89**. Pettigrew repeatedly employed the threat of incarceration for non-compliance with these orders, coercing Wright into making payments despite the lack of legal authority. The payments ordered under void rulings included:
 1. Ordered on or about **March 23, 2020**: ~\$5,360 in interim attorney's fees.
 2. Ordered on or about **June 18, 2020**: ~\$540 in interim attorney's fees.
 3. Ordered on or about **February 2, 2021**: ~\$4,541.89 in interim attorney's fees.

4. Ordered on or about **May 25, 2021**: ~\$4,438 in additional temporary fees.

Wright was explicitly warned that failure to comply with these payment demands would result in incarceration for contempt of court. These threats left Wright with no alternative but to pay, despite the orders being void due to the court's lack of jurisdiction. By knowingly enforcing invalid orders and leveraging coercive threats of imprisonment, Pettigrew exploited his perceived authority for financial gain and caused significant harm to Wright.

These actions constitute:

- **Unauthorized financial demands**, as Pettigrew acted without valid legal appointment.
- **Coercion through threats of incarceration**, violating Wright's constitutional and statutory rights to due process and fair treatment.
- **Misuse of court resources**, undermining the judicial process and eroding public trust in court-appointed officials.

Pettigrew's conduct represents a clear misuse of his role as Amicus Attorney and constitutes financial exploitation, coercion, and a violation of both state and federal law.

- **State Laws Violated:**

- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Pettigrew misused his authority as an Amicus Attorney by enforcing void court orders to demand payments totaling \$14,879.89. His actions directly benefited him financially at the expense of Rustin Wright, despite the orders being invalid due to the lack of jurisdiction. The intentional exploitation of his court-appointed position to obtain these payments constitutes a violation of his legal responsibilities under this statute.
- o **Texas Penal Code § 39.03 – Official Oppression** - Pettigrew knowingly subjected Rustin Wright to mistreatment by threatening incarceration for failure to comply with void orders. These coercive tactics denied Wright his rights to due process and procedural fairness. The repeated use of judicial authority to impose financial and emotional burdens under invalid orders constitutes official oppression, as Pettigrew acted under color of office to inflict harm on Wright.
- o **Texas Penal Code § 31.03 – Theft** - By collecting payments from Wright under court orders that were void, Pettigrew unlawfully appropriated Wright's funds. The lack of legal jurisdiction invalidated the orders, and the use of threats of incarceration nullified any genuine consent Wright could give. This unauthorized appropriation of funds qualifies as theft under Texas law.
- o **Texas Penal Code § 32.45 – Misapplication of Fiduciary Property** - As a court-appointed fiduciary, Pettigrew was entrusted with acting in the best interests of the child and ensuring impartiality in his role. However, he used his position to collect payments for personal financial gain based on void court orders. This intentional mismanagement of his fiduciary responsibilities violated Wright's rights and caused substantial financial harm.
- o **Texas Penal Code § 37.10 – Tampering with Governmental Records** - Pettigrew relied on void court orders as if they were valid governmental records to enforce payment demands. By knowingly presenting these invalid documents as authoritative, he tampered

with governmental records, using them to extract payments from Wright unlawfully. His actions undermined the integrity of the judicial process and caused financial harm.

- o **Texas Penal Code § 32.46 – Securing Execution of Document by Deception** - Since Pettigrew used void orders to create a façade of legitimacy for his fee demands, he should be held accountable for deception. Pettigrew’s reliance on invalid documents to demand and collect fees could constitute securing execution of financial transactions under deceptive pretenses.
- o **Texas Constitution, Article I, Section 19** - Under the Texas Constitution, no individual shall be deprived of life, liberty, or property except by due course of law. Pettigrew’s enforcement of void orders and the accompanying threats of imprisonment violated Wright’s rights to procedural fairness and due course of law. Wright was deprived of both liberty and property through actions lacking legal authority.

- **Federal Laws Violated:**

- o **18 U.S.C. § 241 – Conspiracy Against Rights** - Pettigrew collaborated with others, such as opposing counsels and Judge Graham Quisenberry, to enforce void orders and compel payments, this constitutes a conspiracy to deprive Wright of his constitutional rights. The enforcement of void orders and the use of threats to compel compliance represent a coordinated effort to oppress Wright’s rights to due process and fair treatment under the law.
- o **18 U.S.C. § 242 – Deprivation of Rights Under Color of Law** - This statute addresses individuals acting under color of law to deprive others of rights. Pettigrew’s use of void orders to coerce payments aligns with this violation. By enforcing void orders and leveraging the authority of his court-appointed role, Pettigrew deprived Wright of his rights to due process and property protections.
- o **18 U.S.C. § 371 – Conspiracy to Commit Offense or Defraud the United States** - Since Pettigrew conspired with others (e.g., Robert Thornton, Stephen Lawrence, and Judge Quisenberry) to enforce void orders and compel payments, it constitutes a conspiracy to commit fraud. The coordination between Pettigrew and judicial actors to enforce invalid orders qualifies as a conspiracy against Wright’s rights and the integrity of the legal process.
- o **18 U.S.C. § 1001 – False Statements or Entries Generally** - If Pettigrew knowingly submitted or relied on false representations in court filings, this statute could apply. Presenting void orders as valid governmental records or making false representations to enforce them qualifies as knowingly falsifying material facts.
- o **18 U.S.C. § 1346 – Honest Services Fraud** - Pettigrew violated his fiduciary duty as an Amicus Attorney by exploiting his role for personal financial gain. By enforcing void orders and using threats to compel payments, he deprived Wright of the honest services owed to him as part of his court-appointed duties. Pettigrew’s actions represent a breach of trust and an abuse of his responsibilities under federal law.
- o **Fourteenth Amendment to the United States Constitution** - Pettigrew’s enforcement of void court orders deprived Wright of property without the due process required by the Fourteenth Amendment. The lack of legal jurisdiction for these orders rendered them invalid, yet Pettigrew used them as a basis to coerce payments under threat of incarceration. These actions violated Wright’s constitutional protections against deprivation of property without lawful proceedings.

- **Explanation:**

- o Amicus Attorney Zachary Q. Pettigrew violated state and federal laws by enforcing void court orders and coercing Rustin Wright into paying a total of **\$14,879.89** under the threat of incarceration. Pettigrew was never legally appointed to the case, as all orders issued in Parker County during the relevant timeframe were void due to lack of jurisdiction. Despite this, Pettigrew acted under color of his court-appointed role to enforce four separate void orders signed by Judge Graham Quisenberry, demanding payments from Wright. These actions represent a gross misuse of authority and a clear violation of Pettigrew's fiduciary duties.

Pettigrew's conduct constitutes **abuse of official capacity** under **Texas Penal Code § 39.02**, as he knowingly exploited his position for personal financial benefit. His actions meet the definition of **official oppression** under **Texas Penal Code § 39.03**, as he knowingly subjected Wright to mistreatment and deprived him of his rights through coercive threats of incarceration. The enforcement of void orders to extract payments qualifies as theft under **Texas Penal Code § 31.03** and represents a misapplication of fiduciary property under **Texas Penal Code § 32.45**.

By relying on void orders as if they were valid governmental records, Pettigrew also violated **Texas Penal Code § 37.10** by tampering with governmental records to harm Wright financially. His actions further infringed on Wright's constitutional rights under the **Fourteenth Amendment to the United States Constitution and Article I, Section 19 of the Texas Constitution**, which protect against the deprivation of property without due process of law.

Pettigrew's actions extended beyond state violations. He collaborated with Judge Quisenberry to enforce these void orders so his conduct also **constitutes conspiracy against rights under 18 U.S.C. § 241**. His exploitation of a fiduciary role for personal gain amounts to **honest services fraud under 18 U.S.C. § 1346**.

By leveraging the authority of his perceived court-appointed role, Pettigrew unlawfully enriched himself at Wright's expense, depriving Wright of financial resources and procedural fairness. These actions not only caused financial harm but also eroded trust in the impartiality and legitimacy of court-appointed roles and judicial processes.

- **Impact:**

- o **Financial Harm to Rustin Wright** - Pettigrew's enforcement of void court orders resulted in payments totaling \$14,879.89, extracted from Rustin Wright under threat of incarceration. These unlawful demands deprived Wright of financial resources that could have been used for legitimate legal representation, personal expenses, or care for his child. The financial strain compounded the challenges Wright faced during an already contentious custody dispute.
- o **Emotional and Psychological Harm** - The repeated threats of incarceration placed significant emotional stress on Wright. Being coerced into compliance under fear of imprisonment created anxiety and diminished his ability to focus on the custody case and his relationship with his child. The prolonged litigation and perceived abuse of authority exacerbated Wright's emotional burden.

- o **Deprivation of Rights** - By enforcing void orders, Pettigrew deprived Wright of his constitutional and statutory rights to due process and procedural fairness. These actions violated Wright's right to challenge the payments in a legitimate legal forum, leaving him without recourse to contest the validity of the demands.
- o **Undermining of Judicial Integrity** - Pettigrew's actions eroded trust in the judicial process and the role of amicus attorneys. Court-appointed officials are expected to act impartially and with integrity, but Pettigrew's misuse of his position undermined public confidence in the judicial system's ability to protect individuals' rights and administer justice fairly.
- o **Harm to [REDACTED] Wright's Best Interests** - Pettigrew's focus on enforcing void orders for financial gain detracted from his primary responsibility to advocate for [REDACTED] Wright's best interests. His actions redirected attention away from the child's welfare and prolonged the resolution of custody issues, ultimately harming [REDACTED] by delaying a stable outcome.
- o **Precedent for Misuse of Authority** - Allowing such conduct to go unchecked risks setting a dangerous precedent for the misuse of authority by court-appointed officials. Pettigrew's actions highlight systemic vulnerabilities that could encourage similar misconduct in future cases, further eroding public trust in the judiciary.

Allegation 2: Suppression of Testimony

- **Specific Action:**
 - o From on or about **August 28, 2019** to on or about **June 7, 2021**, during custody hearings in the 415th Judicial District Court, Amicus Attorney Zachary Q. Pettigrew repeatedly recommended the exclusion of testimony from [REDACTED] Wright, which detailed allegations of abuse by Ashley Womack. Judge Quisenberry ruled that the testimony would not be entered into the record. This decision effectively barred the court from considering firsthand allegations central to evaluating the child's safety and well-being. By silencing a key witness, the ruling denied [REDACTED] Wright the opportunity to present critical evidence, thereby influencing the custody determination and potentially obstructing a fair assessment of the case.
- **State Laws Violated:**
 - o **Texas Penal Code § 36.05 – Tampering with Witnesses** - Amicus Attorney Zachary Q. Pettigrew advised the exclusion of [REDACTED] Wright's testimony during the on or about **January 15, 2020**, custody hearing. This testimony, which detailed allegations of abuse by Ashley Womack, was material to the case. Pettigrew's recommendation was made with the intent to obstruct the presentation of evidence and to silence the witness which constitutes tampering under this statute. **Texas Penal Code § 36.05** prohibits influencing, coercing, or inducing a witness to withhold testimony. By advocating for the exclusion of [REDACTED] Wright's critical testimony, Pettigrew's actions obstructed the complainant's ability to present his case fully, meeting the statutory elements of tampering.
 - o **Texas Penal Code § 39.03 – Official Oppression** - Acting under the authority of his unlawfully court-appointed role, Pettigrew knowingly subjected [REDACTED] Wright to mistreatment by denying him the opportunity to testify about his experiences of abuse.

This suppression impeded Rustin Wright's rights to a fair legal process by excluding material evidence that could have influenced custody decisions. **Under § 39.03**, a public servant commits official oppression by knowingly denying rights or subjecting someone to mistreatment. As an amicus attorney, Pettigrew operated under the court's authority or lack thereof. His recommendation to suppress testimony directly denied [REDACTED] and Rustin Wright their legal rights and undermined the integrity of the custody proceedings.

- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Pettigrew misused the authority vested in him as an amicus attorney to recommend actions that favored one party, Ashley Womack, over the other, Rustin Wright. This intentional misuse of his position resulted in harm to Rustin and [REDACTED] Wright by suppressing evidence critical to evaluating the child's best interests. **Section 39.02** applies when a public servant misuses their office to obtain a benefit or harm another. Pettigrew's actions were biased and motivated by favoritism which constitutes an abuse of his court-appointed role and directly harmed the complainant's case by suppressing evidence.
 - o **Texas Penal Code § 37.10 – Tampering with Governmental Records** - Since Pettigrew submitted reports and documentation to the court that misrepresented the relevance and admissibility of [REDACTED] Wright's testimony, he tampered with governmental records by knowingly presenting false or misleading information to influence the court's decision. **Texas Penal Code § 37.10** criminalizes the use of false or deceptive records to affect official proceedings. Any documentation used to justify the suppression of [REDACTED]'s testimony violates this statute.
 - o **Texas Penal Code § 22.04 – Injury to a Child** - By suppressing [REDACTED] Wright's testimony, Pettigrew contributed to ongoing emotional harm to the child. Preventing [REDACTED] from expressing his allegations in court prolonged his exposure to distress and silenced his voice in matters directly affecting his welfare. **Section 22.04** includes emotional injury to a child caused by intentional or negligent acts. Suppressing [REDACTED]'s testimony deprived the court of essential evidence that could have addressed the harm he faced, thereby perpetuating his emotional injury.
 - o **Texas Family Code § 153.002 – Best Interests of the Child** - Suppressing [REDACTED] Wright's testimony directly contradicted the mandate that the best interests of the child must guide all custody determinations. [REDACTED]'s testimony was vital to understanding his needs and well-being, which Pettigrew's actions disregarded. The Texas Family Code prioritizes the child's welfare in custody decisions. By excluding testimony that could reveal abuse and neglect, Pettigrew's recommendation undermined the court's ability to act in [REDACTED] Wright's best interests.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Pettigrew's actions to suppress testimony constitute obstruction of justice under federal law because it was part of a deliberate effort to impede the court's ability to administer justice fairly. Obstruction of justice includes any corrupt act designed to influence or interfere with the due administration of justice. Suppressing key testimony that could alter the outcome of custody proceedings fits within this statute because it was done with corrupt intent.

- **Explanation:**

- o By advising the suppression of ██████ Wright's testimony during the custody hearings, Amicus Attorney Zachary Q. Pettigrew knowingly obstructed the presentation of material evidence critical to the case. His recommendation silenced ██████, a key witness, and deprived the court of the opportunity to fully evaluate allegations of abuse. **Under Texas Penal Code § 36.05**, this conduct constitutes tampering with a witness, as it prevented the disclosure of testimony essential to the proceedings. **Under Texas Penal Code § 39.03**, his actions amounted to official oppression by denying ██████ and Rustin Wright their rights to present evidence and participate in a fair and impartial hearing. These actions undermined the integrity of the legal process and the court's ability to prioritize the best interests of the child.
- **Supporting Evidence:**
 - o **Court Transcripts from on or about August 28, 2019 to on or about June 7, 2021-** Documents Pettigrew's recommendations, the legal reasoning provided, and the judge's ruling suppressing ██████ Wright's testimony.
 - o **Affidavits from the Complainant (Rustin Wright)** - Providing a firsthand account of how the exclusion of evidence of the correct court and testimony impacted the custody proceedings and obstructed the presentation of critical evidence.
 - o **Psychological Evaluation by Dr. Brooks McKenzie** - Details the emotional harm experienced by ██████ Wright, emphasizing the importance of his testimony in addressing allegations of abuse.
 - o **Legal Motions and Objections Filed by Rustin Wright** - Outlines procedural challenges to the suppression and highlight the significance of the excluded evidence of the correct court and exclusion of testimony in evaluating the child's best interests.
- **Impact:**
 - o **Denial of ██████ Wright's Opportunity to Share His Experiences** - Silenced ██████ Wright, a ██████, and prevented the court from hearing firsthand allegations of abuse. This denial diminished his voice in matters directly affecting his welfare and impeded the court's ability to act in his best interests.
 - o **Obstruction of Justice by Preventing Full Presentation of Evidence** - Obstructed the judicial process by excluding critical testimony, depriving the court of information essential to evaluating allegations of abuse and determining custody.
 - o **Prolongation of Custody Disputes and Emotional Harm** - Delayed resolution of the custody case, causing significant emotional distress to ██████ and Rustin Wright. ██████ suffered psychological harm due to the ongoing uncertainty, while Rustin faced financial strain and emotional exhaustion from prolonged litigation.
 - o **Erosion of Trust in Amicus Attorneys and the Judicial Process** - Undermined confidence in the impartiality of amicus attorneys, compromising their role as neutral advocates for the child. This loss of trust weakens the credibility of future custody proceedings.

Allegation 3: Bias and Collusion

- **Specific Action:**

- o Between on or about **August 28, 2019** to on or about **June 7, 2021**, Amicus Attorney Zachary Q. Pettigrew consistently demonstrated bias in custody proceedings by favoring Ashley Womack's interests, undermining the procedural fairness required in such cases. Pettigrew knowingly collaborated with opposing counsel, Robert Thornton, and Judge Graham Quisenberry, leveraging his position to influence case outcomes in favor of Womack. This pattern of bias and collusion is evident through the following actions:
 1. **Suppression of Critical Evidence and Testimony** - Pettigrew advised the exclusion of [REDACTED] Wright's testimony detailing allegations of abuse and psychological harm, a recommendation accepted by Judge Quisenberry during the on or about **August 28, 2019** to on or about **June 7, 2021**, hearings. This decision deprived the court of essential evidence supporting [REDACTED] Wright's best interests.
 2. **Alignment with Opposing Counsel's Strategies** - Pettigrew frequently aligned his recommendations with opposing counsels Robert Thornton and Stephen Lawrence's motions and arguments, particularly regarding the suppression of expert testimony, including that of Dr. Jacobie Robinson. These actions obstructed the introduction of evidence demonstrating [REDACTED]'s emotional harm and Rustin Wright's parental fitness.
 3. **Support for Prejudiced Rulings** - Pettigrew supported Judge Quisenberry's rulings that disproportionately favored Womack, such as the suppression of evidence, denial of motions filed by Wright, and issuance of financial sanctions against him. This pattern reflects a coordinated effort to disadvantage Wright in custody proceedings.

These actions, taken in concert with opposing counsels Robert Thornton and Stephen Lawrence and Judge Quisenberry, disregarded Pettigrew's obligation to act impartially as an amicus attorney and failed to prioritize the welfare of [REDACTED] Wright. By allowing personal or professional biases to influence his conduct, Pettigrew undermined the principles of fairness and integrity central to family law proceedings.

- **State Laws Violated:**

- o **Texas Penal Code § 39.03 – Official Oppression** - Zachary Q. Pettigrew, acting under color of his role as Amicus Attorney, knowingly subjected Rustin Wright to mistreatment by favoring Ashley Womack in custody proceedings. His collaboration with opposing counsels Robert Thornton and Stephen Lawrence, and support of Judge Graham Quisenberry's rulings systematically disadvantaged Wright. This conduct denied Wright procedural fairness, as Pettigrew's partiality influenced the exclusion of critical evidence, suppression of testimony, and decisions unfavorable to Wright. The deliberate bias violated Wright's right to a fair and impartial legal process, constituting official oppression.
- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - As a court-appointed Amicus Attorney, Pettigrew misused his official capacity by leveraging his position to advocate

for biased outcomes. He supported actions, including suppression of evidence and testimony, that benefitted Womack at the expense of Wright. This intentional misuse of authority violated the fiduciary trust placed in Pettigrew by the court, harming Wright financially and emotionally, and compromising ██████ Wright's best interests.

- o **Texas Penal Code § 37.10 – Tampering with Governmental Records** - Pettigrew submitted or relied upon court filings and reports that omitted or misrepresented material facts, favoring Womack and suppressing evidence critical to Wright's case. By presenting biased and incomplete recommendations as part of his official filings, Pettigrew manipulated governmental records to influence custody proceedings unfairly.
- o **Texas Constitution, Article I, Section 19** - Pettigrew's bias and collusion violated Rustin Wright's state constitutional rights to due process and fair legal proceedings. The deprivation of Wright's ability to present critical evidence and participate fully in custody litigation occurred outside the bounds of lawful judicial conduct, infringing upon Wright's protected rights.
- **Federal Laws Violated:**
 - o **18 U.S.C. § 241 – Conspiracy Against Rights** - Pettigrew conspired with opposing counsel and the presiding judge to deprive Rustin Wright of his constitutional rights to due process and a fair trial. This collaboration included suppressing testimony from ██████ Wright, excluding evidence supporting Wright's claims, and aligning recommendations with predetermined rulings that favored Womack. These actions represent a coordinated effort to influence case outcomes in a manner that obstructed Wright's legal rights, meeting the elements of conspiracy under this statute.
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Pettigrew's actions obstructed the due administration of justice by influencing the court to suppress evidence, exclude testimony, and favor predetermined outcomes. His partiality undermined the court's ability to evaluate ██████ Wright's best interests fairly and deprived Wright of the opportunity to present a complete case.
 - o **Fourteenth Amendment to the United States Constitution** - Pettigrew's actions deprived Rustin Wright of property (financial resources for prolonged litigation) and liberty interests (right to parent and participate in fair custody proceedings) without due process of law. By colluding to suppress critical testimony and align with biased rulings, Pettigrew directly obstructed Wright's ability to have a fair hearing, violating the procedural protections guaranteed by the Fourteenth Amendment.
- **Explanation:**
 - o Amicus Attorney Zachary Q. Pettigrew violated his duty to act impartially and prioritize the best interests of ██████ Wright by consistently demonstrating bias in favor of Ashley Womack between on or about **August 28, 2019** to on or about **June 7, 2021**. His actions were characterized by a pattern of collusion with opposing counsels, Robert Thornton and Stephen Lawrence, and alignment with the rulings of Judge Graham Quisenberry. This collaboration led to case outcomes that disproportionately favored Womack while undermining the procedural fairness required in custody proceedings.

Pettigrew's bias and collusion manifested in several ways:

1. **Suppression of Critical Evidence and Testimony** - Pettigrew recommended the exclusion of ██████ Wright's testimony regarding allegations of abuse and psychological harm during his appointment as Amicus Attorney from on or about **August 28, 2019** to on or about **June 7, 2021**. These recommendations were adopted by Judge Quisenberry, depriving the court of vital information necessary to assess ██████'s welfare.
2. **Alignment with Opposing Counsel's Strategies** - Pettigrew's recommendations frequently mirrored the motions and arguments of opposing counsels, Robert Thornton, and Stephen Lawrence. For example, Pettigrew supported objections to the admission of expert testimony and critical evidence, including evaluations by Dr. Jacobie Robinson, which detailed ██████ Wright's emotional harm and Rustin Wright's parental fitness.
3. **Support for Prejudiced Rulings** - Pettigrew reinforced rulings that systematically disadvantaged Rustin Wright, such as the suppression of evidence, denial of Wright's motions, and the issuance of financial sanctions against him. This alignment with Womack's legal strategy and Judge Quisenberry's rulings created the appearance of a predetermined bias.

These actions directly undermined Pettigrew's role as a neutral advocate for ██████ Wright's best interests. Instead of prioritizing the child's welfare, Pettigrew's conduct exacerbated tensions in the custody case, deprived Rustin Wright of a fair opportunity to present his case, and delayed a resolution.

Pettigrew's conduct constitutes official oppression under **Texas Penal Code § 39.03**, as he knowingly subjected Rustin Wright to mistreatment by depriving him of procedural fairness. His collaboration with opposing counsel and Judge Quisenberry to suppress evidence and testimony violated Wright's constitutional rights to due process, meeting the elements of conspiracy against rights under **18 U.S.C. § 241**. Furthermore, Pettigrew's misuse of his official capacity to advance biased outcomes violates **Texas Penal Code § 39.02**, while his reliance on incomplete and biased reports may constitute tampering with governmental records under **Texas Penal Code § 37.10**.

By abandoning his obligation to act impartially, Pettigrew actively obstructed the administration of justice and undermined confidence in the judicial process. His actions prioritized the interests of one party over the child's welfare, causing emotional and financial harm to Rustin Wright and psychological harm to ██████ Wright.

- **Supporting Evidence:**

- o **Court Transcripts Demonstrating Suppression of Testimony and Evidence** – Hearing transcripts between on or about **August 28, 2019** to on or about **June 7, 2021**, document Pettigrew's recommendation to exclude ██████ Wright's testimony regarding allegations of abuse and psychological harm. The recommendation was adopted by Judge Graham Quisenberry, resulting in the suppression of critical evidence essential for evaluating ██████'s welfare. Transcripts from hearings reveal Pettigrew's alignment with opposing counsel's motions to suppress expert testimony, such as evaluations by Dr. Jacobie Robinson, and exclude other evidence favorable to Rustin Wright's case.

- o **Biased Reports and Recommendations Submitted by Pettigrew** - Reports authored by Pettigrew misrepresented the best interests of █████ Wright by omitting critical allegations of abuse and neglect. These reports disproportionately favored Womack and ignored evidence presented by Rustin Wright.
 - o **Judicial Rulings and Financial Sanctions** - Multiple rulings by Judge Quisenberry were influenced by Pettigrew's biased recommendations, including:
 1. The suppression of █████ Wright's testimony.
 2. The denial of Rustin Wright's motions to admit expert evaluations and evidence.
 3. Financial sanctions imposed on Rustin Wright based on Pettigrew's advice, totaling **\$14,879.89**, as enforced under void orders.
 - o **Witness Testimony Highlighting Bias** - Witnesses, including legal professionals and court participants, attest to Pettigrew's consistent partiality in favor of Womack. Testimony highlights his alignment with opposing counsel's motions and disregard for the procedural fairness required in his role as an Amicus Attorney.
 - o **Procedural Records Related to Pettigrew's Withdrawal** - A motion filed on or about **June 3, 2021**, formally requested Pettigrew's removal as Amicus Attorney. The motion cited his bias, failure to act impartially, and inability to serve █████ Wright's best interests. A hearing on this motion was scheduled for **June 7, 2021**, marking the end of Pettigrew's involvement.
- **Impact:**
 - o **Undermined Judicial Integrity** - Zachary Q. Pettigrew's bias and collaboration with opposing counsels Robert Thornton and Stephen Lawrence, and Judge Quisenberry compromised the court's ability to administer justice impartially. By favoring Ashley Womack, Pettigrew obstructed the procedural fairness required to ensure custody decisions were made in the best interests of █████ Wright. His conduct diminished trust in the judicial system and its reliance on amicus attorneys to act as neutral advocates.
 - o **Emotional and Psychological Harm to █████ Wright** - Pettigrew's actions prolonged the custody dispute and prevented the co █████ addressing allegations of abuse and neglect. This negligence left █████ Wright in an unstable and potentially harmful environment, contributing to documented emotional and psychological harm. By suppressing testimony and excluding evidence crucial to evaluating █████'s welfare, Pettigrew failed to prioritize the child's best interests, exacerbating his distress.
 - o **Financial and Emotional Harm to Rustin Wright** - Pettigrew's partiality and support for rulings against Rustin Wright imposed significant financial and emotional burdens. Wright was subjected to financial sanctions and prolonged litigation caused by biased recommendations, forcing him to expend substantial resources to contest unfair rulings. The perception of systemic bias and collusion further amplified Wright's emotional distress, eroding his confidence in the fairness of the judicial process.
 - o **Loss of Public Confidence in Amicus Attorneys** - Pettigrew's conduct undermined the perceived impartiality of amicus attorneys, who are entrusted to act in the best interests of children. His demonstrated bias eroded public trust in the court-appointed roles designed

to protect vulnerable individuals, casting doubt on the integrity of future custody proceedings.

- o **Delay in Custody Resolution** - Pettigrew's actions, including the suppression of critical evidence and support for prejudiced rulings, delayed the resolution of the custody case. This delay perpetuated uncertainty and instability for █████ Wright, preventing him from achieving a stable and secure environment during formative years.
- o **Precedent for Misconduct** - Pettigrew's actions highlight systemic vulnerabilities that, if left unchecked, could encourage similar misconduct by court-appointed officials. His disregard for impartiality and procedural fairness sets a dangerous precedent for future cases, undermining the judiciary's role as a neutral arbiter of justice.

Allegation 4: Obstruction of Justice

- **Specific Action:**

- o On or about **August 28, 2019** to on or about **June 7, 2021**, during critical custody hearings, Amicus Attorney Zachary Q. Pettigrew supported and reinforced court rulings that suppressed motions and evidence crucial to Rustin Wright's case. These rulings excluded key testimony and expert evaluations that demonstrated allegations of abuse, neglect, and emotional harm to █████ Wright. Pettigrew advocated for the suppression of testimony from expert witnesses, including assessments by professionals such as Dr. Jacobie Robinson, which provided insight into █████'s psychological condition and the detrimental impact of continued custody arrangements favoring Ashley Womack.

By aligning his recommendations with those of Ashley Womack's counsel and Judge Graham Quisenberry, Pettigrew contributed to decisions that hindered Wright's ability to present a full and fair case. This suppression of evidence deprived the court of critical information necessary to determine █████ Wright's best interests. Pettigrew's actions reflected a deliberate effort to create an unfair advantage for Womack, obstructing the judicial process and undermining procedural fairness.

- **State Laws Violated:**

- o **Texas Penal Code § 39.03 – Official Oppression** - Pettigrew, acting under color of his role as Amicus Attorney, knowingly subjected Rustin Wright to mistreatment by advocating for and reinforcing rulings that suppressed critical evidence and testimony. These actions deprived Wright of his right to present a full case and obstructed the court's ability to conduct a fair hearing, resulting in procedural injustice. By intentionally suppressing key motions and evidence that could have supported Wright's claims, Pettigrew used his official capacity to create an unfair advantage for Ashley Womack, constituting official oppression.
- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - As a court-appointed Amicus Attorney, Pettigrew misused his official capacity by reinforcing and advocating for rulings that disproportionately favored one party. This misuse of authority created an unfair advantage for Womack while harming Rustin Wright's ability to present critical evidence. By failing to act impartially and advocating for biased rulings, Pettigrew abused his role for purposes that deviated from his court-mandated responsibilities, violating Texas law.

- o **Texas Penal Code § 37.10 – Tampering with Governmental Records** - If Pettigrew submitted reports or recommendations to the court that intentionally omitted or misrepresented facts, he tampered with official records. These actions supported the suppression of evidence and furthered rulings that obstructed Wright’s ability to present his case. The reliance on incomplete or biased records to justify suppression rulings constitutes tampering with governmental records. This manipulation contributed to the obstruction of justice.
- o **Texas Constitution, Article I, Section 19** - Pettigrew’s actions violated Wright’s state constitutional rights to due course of law. By contributing to the suppression of critical evidence and obstructing procedural fairness, Pettigrew deprived Wright of his right to a fair legal process. The denial of procedural fairness and suppression of evidence necessary to protect ██████’s welfare represent a clear infringement on Wright’s rights under Texas law.
- **Federal Laws Violated**
 - o **18 U.S.C. § 1503 – Obstruction of Justice** - Pettigrew’s support for rulings that suppressed critical evidence and testimony directly obstructed the due administration of justice. His actions deprived the court of essential information necessary to evaluate ██████ Wright’s welfare, skewing the legal process in favor of Womack. The statute prohibits corrupt efforts to influence or impede judicial proceedings. Pettigrew’s actions in aligning with suppression rulings undermined the court’s ability to conduct a fair trial, violating the principles of justice.
 - o **Fourteenth Amendment to the United States Constitution** - Pettigrew’s support for rulings that excluded evidence critical to Rustin Wright’s case deprived Wright of his constitutional right to due process. The suppression of motions and evidence necessary to demonstrate ██████’s best interests hindered the fair resolution of the custody dispute. By advocating for rulings that denied Wright a full and fair opportunity to present his case, Pettigrew violated the procedural safeguards guaranteed under the Fourteenth Amendment.
- **Explanation:**
 - o Amicus Attorney Zachary Q. Pettigrew violated state and federal laws by actively supporting and reinforcing court rulings that suppressed critical motions and evidence during a custody hearing on April 5, 2023. His actions directly obstructed the judicial process by preventing Rustin Wright from presenting key testimony and expert evaluations that demonstrated allegations of abuse, neglect, and emotional harm to ██████ Wright.

Pettigrew’s conduct included advocating for the exclusion of testimony from professionals such as Dr. Jacobie Robinson, whose assessments provided vital insight into ██████’s emotional condition and the detrimental impact of the custody arrangement favoring Ashley Womack. By supporting these rulings, Pettigrew deprived the court of crucial evidence necessary to determine ██████ Wright’s best interests.

Pettigrew knowingly obstructed justice in violation of 18 U.S.C. § 1503, which prohibits corrupt efforts to impede judicial proceedings. His actions directly influenced the court to

exclude evidence central to the case, undermining procedural fairness. Furthermore, his conduct constitutes official oppression under Texas Penal Code § 39.03, as Pettigrew acted under the authority of his court-appointed role to subject Rustin Wright to mistreatment by denying him the opportunity to present a full and fair case.

Pettigrew's misuse of his position as Amicus Attorney also violates Texas Penal Code § 39.02, as he used his authority to promote rulings that disproportionately favored Womack at the expense of procedural integrity. Additionally, if Pettigrew's reports or recommendations to the court contained biased or incomplete information, he may have violated Texas Penal Code § 37.10 by tampering with governmental records to support the suppression of evidence.

By obstructing the judicial process, Pettigrew compromised the court's ability to render a fair decision, caused emotional and financial harm to Rustin Wright, and delayed a resolution that would prioritize [REDACTED] Wright's welfare. His actions reflect a disregard for his fiduciary responsibilities and undermined trust in the impartiality of the judicial system.

- **Supporting Evidence:**

- **Court Transcripts from on or about August 28, 2019 to on or about June 7, 2021, Hearings** - Transcripts document Pettigrew's active support for rulings that suppressed motions and excluded expert testimony, such as evaluations from Dr. Jacobie Robinson. These transcripts highlight Pettigrew's direct role in preventing the presentation of critical evidence regarding [REDACTED] Wright's emotional harm.
- **Legal Objections and Motions Filed by Rustin Wright** - Wright's objections and motions outline specific instances where Pettigrew's recommendations influenced rulings that excluded material evidence. These filings provide procedural records showing how Pettigrew's actions obstructed Wright's ability to present his case.
- **Reports and Recommendations Submitted by Pettigrew** - Pettigrew's reports, filed during the case, omitted key evidence related to allegations of abuse and [REDACTED] Wright's emotional harm. These biased reports disproportionately favored Womack and supported rulings that excluded critical information.
- **Witness Testimony Highlighting Suppression** - Testimonies from court observers and legal professionals confirm Pettigrew's support for suppressing evidence favorable to Rustin Wright. Witnesses describe Pettigrew's alignment with Womack's counsel and his failure to act impartially as an Amicus Attorney.

- **Impact:**

- **Skewed Judicial Process** - Pettigrew's support for rulings that suppressed critical evidence and testimony undermined the integrity of the judicial process. By obstructing the presentation of key facts, he deprived the court of essential information necessary to evaluate [REDACTED] Wright's best interests, leading to biased outcomes.
- **Deprivation of Rustin Wright's Rights** - By advocating for and reinforcing rulings that excluded critical motions and evidence, Pettigrew denied Rustin Wright his constitutional and statutory rights to present a full and fair case. This obstruction hindered Wright's

ability to demonstrate abuse and emotional harm to █████ Wright, severely compromising his case.

- o **Prolonged Litigation and Financial Harm** - The suppression of evidence delayed the resolution of the custody dispute, causing protracted litigation. Rustin Wright incurred significant legal costs in attempting to challenge unfair rulings, creating a substantial financial burden.
- o **Emotional Harm to █████ Wright** - The obstruction of justice delayed critical decisions about █████ Wright's welfare, prolonging his exposure to potential harm in an unstable and neglectful environment. Pettigrew's actions prioritized procedural bias over the child's emotional and psychological needs, exacerbating █████'s distress.
- o **Emotional Distress to Rustin Wright** - Pettigrew's actions caused Rustin Wright significant emotional distress, as he was repeatedly prevented from presenting evidence central to protecting his child. The perception of bias and injustice added to Wright's psychological toll throughout the custody proceedings.
- o **Erosion of Trust in the Legal System** - Pettigrew's actions as an Amicus Attorney damaged the credibility of court-appointed representatives. By obstructing justice and aligning with biased rulings, he eroded public trust in the impartiality of the judicial process and the role of amicus attorneys in family law cases.
- o **Precedent for Procedural Misconduct** - Pettigrew's behavior highlights systemic vulnerabilities that, if unaddressed, could encourage similar misconduct by court-appointed officials in future cases. This sets a dangerous precedent that undermines the fairness and reliability of family law proceedings.

Allegation 5: Misrepresentation of Best Interests of the Child

- **Specific Action:**

- o Amicus Attorney Zachary Q. Pettigrew submitted a report to the court that misrepresented the best interests of █████ Wright by disproportionately favoring Ashley Womack. The report omitted critical allegations of abuse and neglect, despite documented evidence and expert evaluations available to Pettigrew at the time. These omissions included findings from psychological assessments highlighting █████'s emotional harm and testimony detailing concerns about neglect.

Pettigrew failed to conduct a thorough investigation into █████'s emotional and physical welfare, disregarding his duty to independently evaluate the evidence. Instead, the report aligned with Ashley Womack's narrative, neglecting his obligation to provide an impartial and accurate assessment of the child's best interests. This submission influenced custody outcomes by presenting incomplete and biased information to the court.

- **State Laws Violated:**

- o **Texas Penal Code § 37.10 – Tampering with Government Records** - Zachary Q. Pettigrew knowingly submitted a court-ordered report on February 10, 2021, that omitted material facts and misrepresented evidence regarding █████ Wright's best interests. The report failed to address allegations of abuse and neglect and excluded critical expert evaluations. By submitting this incomplete and biased report as an official court

document, Pettigrew tampered with a governmental record, hindering the court's ability to make informed decisions based on accurate and complete information.

- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Pettigrew misused his position as an Amicus Attorney to submit a report that disproportionately favored Ashley Womack, disregarding his fiduciary duty to act impartially and in the child's best interests. His failure to conduct a thorough investigation and reliance on biased narratives compromised his court-appointed role, violating his official capacity as a neutral advocate.
- o **Texas Penal Code § 39.03 – Official Oppression** - By submitting a report that misrepresented [REDACTED] Wright's welfare, Pettigrew knowingly subjected Rustin Wright to mistreatment under the color of his role as Amicus Attorney. His actions denied Rustin Wright the opportunity to have critical evidence, including allegations of abuse and expert evaluations, properly considered by the court, obstructing Wright's ability to advocate for [REDACTED]'s best interests.
- o **Texas Constitution, Article I, Section 19** - Pettigrew's actions violated Rustin Wright's state constitutional rights to due course of law. By misrepresenting [REDACTED] Wright's best interests in his report, Pettigrew obstructed Rustin Wright's ability to participate meaningfully in the legal process, resulting in biased custody outcomes and procedural unfairness.

- **Federal Laws Violated:**

- o **18 U.S.C. § 1346 – Honest Services Fraud** - Pettigrew's failure to fulfill his fiduciary duty as a neutral advocate for [REDACTED] Wright constitutes a deprivation of honest services. By submitting a report aligned with Ashley Womack's interests and omitting critical evidence, Pettigrew exploited his court-appointed role for purposes inconsistent with his legal responsibilities. This conduct deprived [REDACTED] and Rustin Wright of the honest services owed to them under the law.
- o **Fourteenth Amendment to the United States Constitution** - Pettigrew's submission of a biased and incomplete report deprived Rustin Wright of his constitutional right to due process. By excluding material evidence and presenting a skewed narrative, Pettigrew impeded the court's ability to conduct a fair evaluation, ultimately denying Wright a fair opportunity to advocate for [REDACTED]'s welfare.

- **Explanation:**

- o Amicus Attorney Zachary Q. Pettigrew submitted a court-ordered report that misrepresented the best interests of [REDACTED] Wright. The report disproportionately favored Ashley Womack by omitting critical evidence of abuse, neglect, and emotional harm, despite the availability of expert evaluations and testimony. Pettigrew failed to conduct a thorough and impartial investigation into [REDACTED]'s welfare, disregarding his fiduciary duty to provide an objective assessment.

The report excluded key findings from professionals, including psychological evaluations, that documented [REDACTED]'s emotional harm and highlighted concerns about the detrimental impact of his custody arrangement. Instead, Pettigrew's conclusions aligned with Womack's narrative, disregarding material evidence and misrepresenting the facts.

This misrepresentation directly influenced custody outcomes by providing the court with biased and incomplete information, compromising its ability to make informed decisions about [REDACTED]'s welfare.

Pettigrew's actions constitute tampering with government records under **Texas Penal Code § 37.10**, as he knowingly submitted a report containing omissions and misrepresentations that impaired the court's decision-making process. Additionally, his failure to act impartially violated Texas Penal Code § 39.02, as he misused his official capacity to submit a report that favored one party at the expense of procedural fairness and [REDACTED] Wright's best interests.

Furthermore, Pettigrew's conduct deprived Rustin Wright of his constitutional right to due process under the **Fourteenth Amendment and Article I, Section 19 of the Texas Constitution**, as the biased report obstructed Wright's ability to fully advocate for his child's welfare. By breaching his fiduciary obligations, Pettigrew also violated **18 U.S.C. § 1346**, which ensures honest services by court-appointed officials.

By submitting an inaccurate and incomplete report, Pettigrew neglected his role as a neutral advocate for the child, obstructing the judicial process and undermining the principles of fairness and impartiality that govern family law proceedings.

- **Supporting Evidence:**

- o The report submitted by Zachary Q. Pettigrew is a primary piece of evidence demonstrating misrepresentation. It omits critical allegations of abuse and expert evaluations that document [REDACTED] Wright's emotional harm, favoring Ashley Womack's position. This report should be reviewed for discrepancies and omissions relative to other evidence submitted in the case.
- o **Court Transcripts Referencing the Report** - Transcripts from proceedings that discuss or reference Pettigrew's report can provide insight into how the report influenced the court's decisions and highlight omissions or misrepresentations.

- **Impact:**

- o **Inaccurate Custody Outcomes** - Pettigrew's submission of a biased and incomplete report directly influenced custody decisions, depriving the court of critical information necessary to assess [REDACTED] Wright's welfare accurately. The omission of allegations of abuse and neglect skewed the court's understanding, resulting in custody outcomes that failed to reflect the child's best interests.
- o **Emotional Harm to [REDACTED] Wright** - The misrepresentation in Pettigrew's report contributed to prolonged exposure to an unstable and potentially harmful environment. By failing to address allegations of abuse and neglect, the report neglected [REDACTED] Wright's emotional and psychological needs, exacerbating his distress, and leaving him without appropriate safeguards.
- o **Emotional and Financial Harm to Rustin Wright** - Rustin Wright endured significant emotional distress from the misrepresentation of his parental fitness and the omission of evidence that could have supported his case. Additionally, the biased report forced Wright

to incur substantial legal expenses in challenging the unfair conclusions and attempting to protect his child's welfare.

- o **Erosion of Trust in the Amicus Role** - Pettigrew's failure to provide an impartial and thorough assessment undermined confidence in the Amicus Attorney's role as a neutral advocate for the child's best interests. This breach of fiduciary duty damaged public trust in the judicial process and the integrity of court-appointed officials.
- o **Prolonged Litigation and Instability** - The inaccuracies and omissions in Pettigrew's report delayed the resolution of custody disputes, prolonging litigation and preventing [REDACTED] Wright from achieving a stable environment. These delays created unnecessary uncertainty and harm for both [REDACTED] and Rustin Wright.
- o **Setting a Dangerous Precedent** - Pettigrew's actions highlight systemic vulnerabilities in the role of court-appointed advocates. Without accountability for such misrepresentations, similar misconduct could be perpetuated in future cases, undermining the fairness and reliability of family law proceedings.

Allegation 6: Emotional and Psychological Harm to [REDACTED] Wright

- **Specific Action:**

- o Between on or about **August 2019** and on or about **June 2021**, Amicus Attorney Zachary Q. Pettigrew's conduct, including the suppression of testimony, biased recommendations, and misrepresentation of [REDACTED] Wright's best interests, contributed directly to the child's prolonged emotional and psychological harm. Pettigrew consistently prioritized Ashley Womack's interests over [REDACTED] well-being, failing to fulfill his fiduciary duty to advocate for the child's

Notable actions include:

- **Exclusion of [REDACTED] Wright's Perspective** - During hearings, objections were raised regarding testimony or evidence relating to [REDACTED] experiences. Some objections were based on procedural grounds, limiting the ability of the court to fully consider [REDACTED]'s perspective. It remains unclear whether these decisions were directly influenced by the Amicus Attorney.
- **Submitting a Biased Report** - Pettigrew's report omitted key evidence of abuse, neglect, and emotional harm, aligning its conclusions with Ashley Womack's narrative. The failure to present an impartial and thorough evaluation of [REDACTED] distorted the court's understanding and undermined decisions contrary to [REDACTED]'s best interests.

[REDACTED] actions deprived the court of accurate and complete information, directly harming [REDACTED] Wright by perpetuating conditions detrimental to his emotional and psychological

- **State Laws Violated:**

- o **Texas Penal Code § 22.04 – Injuring a Child** - Zachary Q. Pettigrew's conduct as Amicus Attorney contributed to [REDACTED] Wright's prolonged exposure to an emotionally and psychologically harmful environment. By suppressing [REDACTED] testimony on January

15, 2020, and submitting a biased report on February 10, 2021, Pettigrew failed to advocate for the child's best interests. These omissions and misrepresentations enabled conditions that caused documented emotional harm, as outlined in a psychological evaluation by Dr. Brooks McKenzie. P's actions constitute indirect injury by omission, as his failures contributed to ongoing harm.

- o **Texas Penal Code § 37.01 – Tampering with Evidence** - Pettigrew tampered with evidence by suppressing testimony and omitting key information in his report about February 10, 2021. These omissions concealed critical facts about emotional and psychological harm, obstructing the court's ability to evaluate the welfare accurately. By knowingly withholding or misrepresenting evidence, Pettigrew impeded the judicial process and violated this statute.
- o **Texas Penal Code § 39.03 – Official Oppression** - Acting under color of his court-appointed role, Pettigrew knowingly subjected Wright to mistreatment by failing his duty to act impartially in favor of Ashley Womack's interests over Wright's welfare. Pettigrew denied the duty required under the law. His actions created conditions that exacerbated emotional distress, constituting official oppression.
- o **Texas Penal Code § 20.02 – Unlawful Restraint (Constructive Application)** - While typically involving physical restraint, unlawful restraint under Texas law can extend to situations where someone, acting under authority, restricts another's liberty or ability to act freely. Pettigrew's suppression of Wright's testimony and biased reporting effectively restrained Wright's ability to express his concerns of abuse and advocate for his welfare. This constructive restraint impeded Wright's right to participate in legal proceedings addressing his well-being.
- o **Texas Penal Code § 32.45 – Misapplication of Fiduciary Property** - Pettigrew, acting in a fiduciary capacity as a court-appointed Attorney, failed to apply his role and authority impartially to prioritize Wright's best interests. By submitting biased reports and suppressing testimony, he misapplied the trust and resources placed in him by the court, contributing to prolonged harm. This statute applies as Pettigrew's actions constituted a breach of fiduciary responsibility, leading to harm.
- o **Texas Penal Code § 36.05 – Tampering with Witnesses** - Pettigrew's recommendation to suppress Wright's testimony on or about January 15, 2020, meets the criteria for tampering with a witness. Pettigrew enticed or coerced the court to suppress testimony essential to understanding Wright's experiences, this falls under tampering with witnesses by preventing a full presentation of critical evidence.
- o **Texas Penal Code § 42.07 – Harassment** - Pettigrew's actions or recommendations indirectly caused psychological harm or distress to Wright by prolonging harmful conditions so this statute applies. Harassment can encompass actions that knowingly cause emotional distress, particularly when the harm is foreseeable and preventable.
- o **Texas Constitution, Article I, Section 19 -** Pettigrew's suppression of evidence and failure to provide an impartial assessment of Wright's best interests deprived Rustin Wright of their state constitutional right to a fair course of law. His actions undermined fair legal proceedings and prolonged conditions detrimental to Wright's welfare.

• **Federal Laws Violated:**

- o **18 U.S.C. § 1346 – Honest Services Fraud** - Pettigrew's failure to fulfill his fiduciary duty as a neutral advocate for Wright constitutes a deprivation of honest services. By aligning with Ashley Womack's interests and neglecting to advocate for Wright's welfare,

welfare, Pettigrew breached his court-appointed responsibilities, violating this federal statute.

- o **18 U.S.C. § 1503 – Obstruction of Justice** - Pettigrew's suppression of testimony and omissions report hindered the court's ability to render a fair and informed decision regarding [REDACTED] custody and welfare. His actions obstructed the due administration of justice by [REDACTED] critical evidence from being heard. This federal statute applies to his conduct as an Amicus Attorney.
- o **Fourteenth Amendment to [REDACTED] ited States Constitution** - Pettigrew's actions deprived Rustin Wright and [REDACTED] Wright of their constitutional right to due process. By suppressing testimony, omitting critical evidence, and submitting a biased report, Pettigrew obstructed the court's ability to make fair and informed decisions. This violation hindered Rustin Wright's ability to advocate for his child and contributed to [REDACTED]'s ongoing harm.

- **Explanation:**

- o Between ~August 2019 and ~June 2021, Am [REDACTED] torney Zachary Q. Pettigrew engaged in actions that directly cont [REDACTED] to [REDACTED] Wright's prolonged emotional and psychological harm. By suppressing [REDACTED] ny, Pettigrew denied the court the opportu [REDACTED] ear critical allegatio [REDACTED] use and neglect, obstructing its ability to evaluate [REDACTED] welfare fully. Pettigrew submitted a report that omitted key evidence of emotion [REDACTED], misrepresented the child's circumstances, and aligned with Ashley Womack's narrative. These actio [REDACTED] ived the court of accurate and complete information necessary to protect [REDACTED] best interests. Pettigrew's conduct failed to fulfill his [REDACTED] ry duty as an im [REDACTED] advocate for the child, vio [REDACTED] is obligation to prioritize [REDACTED] well -being. His partiality and inaction allowed [REDACTED] exposure to harmful c [REDACTED] ns to continue, exacerbating the child's documen [REDACTED] tional harm as evidenced by a psychological evaluation conducted by Dr. Brooks McKenzie.

- **Supporting Evidence:**

- o **Court Transcripts from th [REDACTED] about January 15, 2020 Hearing** - Pettigrew's recommendation to suppress [REDACTED] Wright' [REDACTED] ony is a critical piece of evidence. These transcripts document t [REDACTED] usion of [REDACTED] allegations of abuse and neglect, which were essential for assessing his emoti [REDACTED] ll-being.
- o **Report Submitted by Pettigrew** - Pettigrew's report demonstrates omissions and misrepresentations regarding [REDACTED] Wright's welfare. The document reflects a failure to address key evidence, includi [REDACTED] gations of neglect and emotional harm, leading to skewed recommendations.
- o **Psychological Ev [REDACTED] n by Dr. Brooks McKenzie** - This evaluation provides documentation of [REDACTED] Wright's emotional harm and the impact of prolonged instability in his li [REDACTED] tuation. Pettigrew's actions contributed to this harm by failing to address these concerns in his recommendations.

- **Impact:**

- o **Emotional and Psychological Harm to [REDACTED] Vrig** - Pettigrew's suppression of testimony and submission of biased repo [REDACTED] nged [REDACTED] exposure to harmful conditions, exacerbating his emotional and psychologi [REDACTED] ress. By omitting critical allegations of abuse and neglect and disregarding expert evaluations, Pettigrew

contributed to instability in [REDACTED] living environment, directly harming his mental health as documented in evidence by Dr. Brooks McKenzie.

- o **Prolonged Separation from Rustin Wright** - Pettigrew's actions delayed custody outcomes that could have alleviated [REDACTED] circumstances. This prolonged separation from his father deprived [REDACTED] of a meaningful parental presence, compounding his emotional harm and sense of insecurity.
- o **Undermined Confidence in the Legal System** - [REDACTED] experience of being silenced and overlooked in critical court proceedings diminished his trust in the legal system's ability to protect his welfare. This erosion of trust has long-term implications for his faith in institutional fairness.
- o **Emotional Distress to Rustin Wright** - By suppressing evidence and submitting biased recommendations, Pettigrew placed significant emotional and financial burdens on Rustin Wright. The frustration and helplessness caused by Pettigrew's partiality added to Wright's psychological toll as he fought to protect his child's welfare.
- o **Prolonged Litigation and Financial Harm** - Pettigrew's biased actions created delays in resolving the custody case, extending litigation, and increasing costs for Rustin Wright. These financial burdens further strained Wright's resources and ability to seek resolution.
- o **Precedent for Neglect of Fiduciary Duties** - Pettigrew's failure to fulfill his responsibilities as an Amicus Attorney sets a dangerous precedent for neglecting the impartial advocacy required of court-appointed officials. His actions undermine public trust in the judicial process and the integrity of the amicus role.

Summary of Amicus Attorney Zachary Q. Pettigrew's Alleged Violations

1. **Suppression of Testimony (on or about January 15, 2020)** - Pettigrew recommended excluding [REDACTED] Wright's testimony regarding allegations of abuse, depriving the court of critical evidence necessary to assess [REDACTED] welfare.
 2. **Bias and Collusion (on or about August 2019 – on or about June 2021)** - Pettigrew consistently aligned his recommendations with Ashley Womack's interests and collaborated with opposing counsels and Judge Graham Quisenberry to influence case outcomes unfairly.
 3. **Obstruction of Justice (On or about April 5, 2023)** - While Pettigrew's involvement likely ended in June 2021, the allegation of obstruction of justice references earlier actions, such as his support for rulings that suppressed evidence and testimony. The timeline of this specific violation should be adjusted to reflect pre-withdrawal events.
 4. **Misrepresentation of Best Interests of the Child (on or about February 10, 2021)** - Pettigrew submitted a biased report that omitted critical allegations of abuse and emotional harm, prioritizing Ashley Womack's narrative and failing to provide the court with an impartial assessment of [REDACTED] best interests.
 5. **Emotional and Psychological Harm to [REDACTED] Wright (on or about August 2019 – on or about June 2021)** - Pettigrew's actions, including testimony suppression and biased reporting, contributed directly to [REDACTED] prolonged emotional and psychological harm. His failure to advocate for [REDACTED] best interests exacerbated the child's distress and prolonged exposure to harmful conditions.
- **State Laws Violated:**
 - o **Penal Code § 22.04 – Injury to a Child** - Pettigrew's actions contributed to [REDACTED] Wright's prolonged emotional harm. By suppressing testimony and submitting

biased reports, Pettigrew enabled [REDACTED] continued exposure to harmful conditions. This constitutes indirect injury through omission.

- o **Texas Pen § 36.05 – Tampering with Witnesses** - Pettigrew’s recommendation to suppress [REDACTED] testimony during the January 15, 2020, hearing silenced critical evidence of abuse and neglect. This act interfered with [REDACTED] ability to provide testimony, violating this statute.
- o **Texas Penal Code § 37.09 – Tampering with Evidence** - By suppressing [REDACTED]’s testimony and omitting crucial information in his February 10, 2021, report, Pettigrew concealed critical facts necessary for the court’s decision-making process.
- o **Texas Penal Code § 37.10 – Tampering with Governmental Records** - Pettigrew knowingly submitted a biased and incomplete report as an official court document. This report misrepresented material facts and undermined the integrity of judicial proceedings.
- o **Texas Penal Code § 39.02 – Abuse of Official Capacity** - Pettigrew misused his court-appointed role to submit biased recommendations and enforce void orders for financial gain. His intentional exploitation of authority directly harmed Rustin and [REDACTED] Wright.
- o **Texas Penal Code § 39.03 – Official Oppression** - Acting under color of office, Pettigrew subjected Rustin and [REDACTED] Wright to mistreatment by suppressing evidence, submitting biased reports, and advocating for rulings that disadvantaged them. These actions violated their rights to procedural fairness.
- o **Texas Penal Code § 20.02 – Unlawful Restraint (Constructive Application)** - Pettigrew’s suppression of [REDACTED] Wright’s testimony and failure to advocate for [REDACTED]’s best interests restricted [REDACTED] ability to participate fully in decisions affecting his welfare. This constitutes a constructive form of unlawful restraint.
- o **Texas Penal Code § 31.03 – Theft** - Pettigrew unlawfully appropriated \$14,879.89 from Rustin Wright by enforcing void court orders and threatening incarceration for non-compliance. This coerced collection of payments qualifies as theft.
- o **Texas Penal Code § 32.45 – Misapplication of Fiduciary Property** - Pettigrew misapplied his fiduciary responsibilities as Amicus Attorney by using his position to enforce void orders for personal financial gain. Additionally, his biased recommendations violated his obligations to act in [REDACTED] best interests.
- o **Texas Penal Code § 32.46 – Securing Execution of a Document by Deception** - Pettigrew misrepresented the validity of void court orders to induce payments from Rustin Wright. This act of deception led to the execution of payments that were legally invalid.
- o **Texas Penal Code § 4 – Harassment** - Pettigrew’s actions caused foreseeable psychological harm to [REDACTED] Wright by prolonging harmful custody conditions. His suppression of testimony and biased reporting knowingly inflicted emotional distress.
- o **Texas Penal Code § 7.02 – Criminal Responsibility for Conduct of Another** - Pettigrew is criminally liable for collaborating with others, including Judge Quisenberry, and opposing counsels Robert Thornton and Stephen Lawrence, in suppressing evidence and enforcing void orders.
- o **Texas Family Code § 107.021 – Role of an Amicus Attorney** - Pettigrew violated his statutory duty to act impartially as an Amicus Attorney. His suppression of testimony and biased recommendations demonstrated a failure to fulfill his court-appointed role.
- o **Texas Family Code § 153.002 – Best Interests of the Child** - Pettigrew obstructed the court’s ability to prioritize [REDACTED] Wright’s welfare by suppressing evidence and

submitting biased reports. These actions delayed necessary custody decisions, harming [REDACTED].

- o **Texas Family Code § 261.001(1)(C) – Emotional Abuse** - Pettigrew's suppression of testimony and biased reports contributed to emotional harm to [REDACTED] Wright. These actions meet the statutory definition of emotional abuse under Texas family law.

- **Federal Laws Violated:**

- o **18 U.S.C. § 1346 – Honest Services Fraud** - Pettigrew breached his fiduciary duty by leveraging his role to enforce void orders for personal financial gain. His actions deprived Rustin and [REDACTED] Wright of the honest services owed to them as part of his court-appointed duties.
- o **18 U.S.C. § 1503 – Obstruction of Justice** - Pettigrew suppressed testimony and omitted critical evidence, obstructing the judicial process. His actions impeded the court's ability to administer justice fairly.
- o **18 U.S.C. § 241 – Conspiracy Against Rights** - By conspiring with others to enforce void orders and suppress evidence, Pettigrew deprived Rustin and [REDACTED] Wright of their constitutional rights to due process and a fair trial.
- o **18 U.S.C. § 1001 – False Statements or Entries** - Pettigrew knowingly submitted biased reports that misrepresented [REDACTED] Wright's welfare. These false statements were used to influence judicial decisions, violating federal law.
- o **18 U.S.C. § 1962 – Racketeer Influenced and Corrupt Organizations Act (RICO)** - Zachary Q. Pettigrew's actions, including enforcing void court orders, suppressing testimony, and collaborating with others to manipulate case outcomes, demonstrate a pattern of racketeering activity under **18 U.S.C. § 1962**. By conspiring with individuals such as Judge Graham Quisenberry and opposing counsel Robert Thornton, Pettigrew participated in an enterprise that carried out acts of extortion, fraud, and obstruction of justice. These actions included **coercing payments totaling \$14,879.89 from Rustin Wright under threat of incarceration**, suppressing critical evidence such as [REDACTED] Wright's testimony, and **misrepresenting void court orders to enforce financial demands**. The coordinated and repeated nature of these acts qualifies as a pattern of racketeering activity, with the enterprise's actions impacting interstate commerce through financial transactions and legal proceedings. Pettigrew's conduct violates **18 U.S.C. § 1962(c) for conducting an enterprise through racketeering activity** and **18 U.S.C. § 1962(d) for conspiring to commit these offenses**.

Impact:

1. **Financial and Emotional Harm - Pettigrew's enforcement of void court orders** and suppression of evidence caused significant financial and emotional harm to Rustin Wright. By **coercing \$14,879.89 in payments** under threat of incarceration and prolonging litigation through biased recommendations, Pettigrew inflicted severe financial burdens. Rustin Wright's increased legal costs, coupled with the emotional toll of fighting a biased process, exacerbated his distress. [REDACTED] **Wright also suffered prolonged emotional harm as his best interests were** [REDACTED], further deepening the impact on the Wright family.

2. **Legal Confusion and Prolonged Litigation** - Pettigrew's suppression of testimony, omission of critical evidence, and submission of biased reports disrupted the court's ability to resolve the custody case efficiently. These actions created unnecessary delays, forcing the Wright family into extended legal battles that hindered the prompt resolution of [REDACTED]'s custody and welfare. The legal confusion arising from Pettigrew's reliance on void court orders further complicated proceedings, denying the Wrights a timely and fair outcome.
3. **Erosion of Public Trust** - Pettigrew's unethical conduct undermined the integrity of the amicus attorney role and the broader judicial system. His partiality and misuse of authority cast doubt on the ability of court-appointed officials to act impartially in protecting the welfare of children. This erosion of trust damages the perception of fairness and impartiality essential to the justice system, leaving those who rely on it to question its credibility and effectiveness.

Recommended Actions Against Amicus Attorney Zachary Q. Pettigrew

1. **Referral for Criminal Investigation** - Refer Pettigrew's actions to the appropriate law enforcement agencies for investigation of criminal violations, including tampering with witnesses, tampering with governmental records, theft, abuse of official capacity, and potential violations of federal laws such as RICO, obstruction of justice, and conspiracy against rights.
2. **Mandatory Restitution** - Require Pettigrew to reimburse Rustin Wright for the **\$14,879.89** collected under void court orders and compensate for the financial and emotional harm caused by his actions. Restitution should include the return of all improperly obtained funds and coverage of Wright's legal costs incurred due to Pettigrew's misconduct.
3. **Formal Complaint to the State Bar of Texas** - File a comprehensive complaint with the State Bar of Texas, citing violations of professional and ethical standards, including breaches of fiduciary duty, suppression of evidence, and misuse of official capacity. Request disciplinary actions, including revocation of his license to practice law.
4. **Immediate Suspension and Disqualification** - Suspend Zachary Q. Pettigrew from serving as an Amicus Attorney or any similar court-appointed role pending the outcome of an investigation. Given the extent of his alleged misconduct, disqualification from future roles requiring impartiality and fiduciary duties is warranted.
5. **Enhanced Oversight and Reform** - Recommend reforms to ensure greater oversight of Amicus Attorneys in similar cases. This may include mandatory training on ethical obligations, impartiality, and fiduciary duties, as well as regular performance reviews to prevent future abuses of authority.
6. **Public Disclosure of Investigation Results** - Ensure transparency by making the findings of any investigations and disciplinary actions against Pettigrew publicly available. This will restore public confidence in the judicial system and demonstrate accountability for misconduct by court-appointed officials.

5. Ashley Womack

Allegation 1: Interference with Child Custody

- **Specific Action:**

In **June 2015**, Ashley Womack unlawfully relocated [REDACTED] Wright from Lamar County to Parker County, directly violating the geographic restriction established in the **March 2010 Agreed Order in Suit to Modify Parent-Child Relationship issued by the 6th Judicial District Court of Lamar County, Texas**. This order explicitly required [REDACTED]'s primary residence to remain within Lamar and Collin Counties, unless modified by a court order or a written agreement signed by both parents and filed with the court. At the time of the relocation, no such modification or agreement had been authorized.

The case had undergone several jurisdictional transfers prior to the relocation. On or about **November 5, 2014**, the **6th Judicial District Court transferred the case to the Lamar County Court at Law, relinquishing its authority**. On or about **June 2, 2015**, after the recusal of Judge Harris, **the case was reassigned to the 62nd Judicial District Court**, which held exclusive jurisdiction over all custody matters involving [REDACTED] Wright. Despite this clear chain of jurisdiction, **Womack relocated [REDACTED] to Parker County without seeking approval from the 62nd Judicial District Court or filing a request to modify the 2010 geographic restriction**.

Use of Void Orders and No Contact Order

After relocating [REDACTED] to Parker County, Ashley Womack relied on void orders issued by Parker County courts to procedurally terminate Rustin Wright's parental rights and limit his contact with [REDACTED]. Among these void orders was a **No Contact Order** that effectively severed Wright's relationship with his son. This order was issued without jurisdiction and deprived Wright of the ability to communicate with or see [REDACTED], inflicting severe emotional and psychological harm on both father and child.

The No Contact Order exacerbated the harm caused by the relocation. By legally isolating Wright, it undermined his ability to participate in [REDACTED]'s upbringing, eroded [REDACTED]'s trust in his father, and disrupted the parental bond. These outcomes violated Wright's constitutional rights to due process and parental involvement while disregarding [REDACTED]'s best interests.

Damaging Effects of Institutional Placements - Void orders were further used to authorize [REDACTED]'s placement in institutions without Wright's input or consent:

Dallas Juvenile Detention Center - [REDACTED] was sent to this facility for one night, a decision made without legal authority or justification. This action caused immediate emotional distress to [REDACTED] and further disrupted Wright's ability to advocate for his son.

Resolution Ranch Academy (Freshman Year) - During [REDACTED]'s freshman year, he was placed in this reform boarding school. This placement removed [REDACTED] from his home environment and Wright's influence, intensifying the strain on their relationship.

Mount Michael Benedictine in Omaha, Nebraska (Sophomore–Senior Years) - For the remainder of his high school years, [REDACTED] was enrolled in an all-boys Catholic boarding school in Nebraska. This out-of-state placement further deprived Wright of

meaningful involvement in [REDACTED]'s life and development, creating long-term emotional harm.

These placements, based on void orders, removed [REDACTED] from Texas and subjected him to prolonged isolation from his father, violating statutory and constitutional protections.

- **State Laws Violated:**

- o **Texas Penal Code § 25.03 – Interference with Child Custody** - Ashley Womack violated Texas Penal Code § 25.03 by knowingly and intentionally relocating [REDACTED] Wright from Lamar County to Parker County in June 2015, in direct violation of the geographic restriction imposed by the March 2010 Agreed Order in Suit to Modify Parent-Child Relationship, issued by the 6th Judicial District Court of Lamar County, Texas.

This order explicitly required [REDACTED]'s primary residence to remain within Lamar and Collin Counties, unless both parents signed a written agreement permitting the relocation and filed it with the court, or the court issued a valid order modifying the restriction. At the time of the relocation, no modification or agreement existed, making Womack's actions a direct contravention of the court order.

By intentionally relocating [REDACTED] without authorization, Womack deprived Rustin Wright of his lawful custodial rights, including regular parenting time and the ability to participate meaningfully in [REDACTED]'s upbringing. Her deliberate actions created significant jurisdictional confusion, prolonged legal disputes, and caused financial and emotional harm to Wright and [REDACTED]. These actions meet the statutory definition of Interference with Child Custody, as Womack knowingly acted in disregard of a valid court order, resulting in the unlawful deprivation of Wright's custodial rights.

- **Explanation:**

- o Ashley Womack's relocation of [REDACTED] Wright from Lamar County to Parker County in **June 2015** constitutes a clear violation of **Texas Penal Code § 25.03 – Interference with Child Custody**. The March 2010 Agreed Order in Suit to Modify Parent-Child Relationship, issued by the 6th Judicial District Court of Lamar County, Texas, explicitly restricted [REDACTED]'s primary residence to Lamar and Collin Counties unless:

1. Both parents signed a written agreement permitting the relocation, which was required to be filed with the proper court with jurisdiction, or
2. The court with valid jurisdiction issued a subsequent order modifying the geographic restriction.

Womack's relocation occurred without fulfilling either of these conditions. Despite her knowledge of the court-ordered restriction, Womack actively participated in the 2010 proceedings so she intentionally relocated [REDACTED] to Parker County without seeking judicial approval or filing a written agreement with Rustin Wright. This action directly contravened the valid court order.

The unlawful relocation caused significant disruption to the court-mandated custody arrangement, depriving Rustin Wright of his rights as a custodial parent. Womack's actions interfered with Wright's ability to maintain regular contact with [REDACTED].

participate in key decisions regarding [REDACTED]'s upbringing, and ensure his emotional and developmental needs were met.

The relocation created jurisdictional confusion, requiring additional legal proceedings attempting to address the violation and to enforce the valid custody order. These legal complications prolonged the custody dispute, increased litigation costs for Wright, and delayed the resolution of critical matters affecting [REDACTED]'s welfare.

Womack's knowing and intentional violation of the geographic restriction imposed by the 2010 order satisfies the statutory elements of Interference with Child Custody under **Texas Penal Code § 25.03**. Her actions were deliberate and resulted in the unlawful deprivation of Wright's custodial rights, causing significant emotional and financial harm to both Wright and [REDACTED]

- **Supporting Evidence:**

- o **March 2010 Agreed Order in Suit to Modify Parent-Child Relation** The **6th Judicial District Court of Lamar County** issued this order, restricting [REDACTED] Wright's primary residence to **Lamar and Collin Counties**, unless:

- Both parents signed a written agreement permitting relocation and filed it with the court, or
- A subsequent court order modified the restriction.

This valid and enforceable order establishes Womack's obligation to maintain [REDACTED]'s residence within the designated counties.

- o **Lack of Modification to the Geographic Restriction** - Court records confirm that **no modification to the 2010 order** was sought or approved by the **62nd Judicial District Court**, which assumed jurisdiction of the case on **June 2, 2015** following the recusal of Judge Harris. Womack failed to obtain the required approval for [REDACTED]'s relocation to Parker County.
- o **Jurisdictional Transfers and Lack of Authority for Parker County Orders** - On **November 5, 2014**, the **6th Judicial District Court transferred jurisdiction** of the case to the **Lamar County Court at Law**, relinquishing its authority. On **June 2, 2015**, the case was transferred to the **62nd Judicial District Court**, establishing its exclusive jurisdiction. Despite the clear transfer of jurisdiction, Parker County courts began issuing orders after **September 5, 2018**, when the case was improperly transferred to Parker County. These orders were void because Parker County lacked proper jurisdiction over the case, rendering any actions or rulings legally invalid.
- o **Use of Void Orders in Parker County**
 - **Void No Contact Order** - A No Contact Order issued by Parker County courts prohibited Rustin Wright from communicating with [REDACTED]. This order was issued without jurisdiction and further severed Wright's relationship with [REDACTED], creating long-term emotional harm and depriving Wright of his custodial rights. The order unjustly isolated [REDACTED] from his father, prioritizing Womack's interests and enabling her to further interfere with Wright's parenting time.

- **Institutional Placements Based on Void Orders** - Parker County courts relied on void orders to authorize ██████'s placement in institutions, including:
 1. **Dallas Juvenile Detention Center** for a night, which caused immediate emotional harm to ██████ and further alienated him from his father.
 2. **Resolution Ranch Academy** during ██████'s freshman year, removing him from his father's influence without justification.
 3. **Mount Michael Benedictine Boarding School** in Nebraska during his sophomore through senior years, further isolating ██████ and denying Wright meaningful parental involvement.

These placements, made without valid judicial authorization or input from Wright, violated his parental rights and caused significant emotional and financial harm.

o **Filings, and Testimony from Rustin Wright showing the following:**

- The disruption caused by Womack's unauthorized relocation of ██████.
- His exclusion from key decisions affecting ██████'s welfare, including the void No Contact Order and institutional placements.
- His substantial legal efforts to enforce the valid geographic restriction and challenge void orders issued by Lamar County and Parker County.

o **Psychological Harm to ██████ Wright** - ██████'s placements, initiated under void orders, caused documented emotional distress, including anxiety and attachment issues. Professional evaluations and testimony detail the impact of ██████'s removal from his father's care and the lack of stability resulting from the void orders and institutional placements.

Ashley Womack's unauthorized relocation of ██████ Wright violated the valid 2010 court order and constituted interference with custody under **Texas Penal Code § 25.03**. Her reliance on **void orders issued by Lamar County and Parker County** courts to justify ██████'s continued isolation and institutional placements exacerbated the harm caused. These void orders unlawfully restricted Rustin Wright's custodial rights, deprived ██████ of his father's support, and caused prolonged emotional and psychological harm.

• **Impact:**

- o **Disruption of Custodial Rights** - Ashley Womack's unauthorized relocation of ██████ Wright from Lamar County to Parker County violated court-ordered geographic restrictions, depriving Rustin Wright of his lawful custodial rights. The move obstructed Wright's ability to maintain regular contact with ██████, participate in significant decisions about his upbringing, and provide emotional and parental support.

The subsequent reliance on **void orders** in Parker County compounded this disruption by formally restricting Wright's ability to communicate with or see his son. The **No Contact Order**, issued without jurisdiction, effectively severed the father-child relationship, inflicting lasting emotional harm on both parties.

- o **Emotional and Psychological Harm to [REDACTED] Wright** - [REDACTED] experienced profound emotional and psychological harm due to the repeated relocations and institutional placements authorized under void orders. Key impacts include:
 - **Instability:** Being removed from his father's care and placed in a series of unfamiliar environments, including the Dallas Juvenile Detention Center, Resolution Ranch Academy, and Mount Michael Benedictine Boarding School, deprived [REDACTED] of a consistent parental relationship during critical developmental years.
 - **Emotional Distress:** The isolation from his father and the resulting instability contributed to documented issues such as anxiety, attachment struggles, and mistrust of caregivers.
- o **Financial Burden on Rustin Wright** - Womack's actions and the resulting reliance on void orders forced Rustin Wright to incur significant legal expenses in his efforts to enforce the valid court order and challenge the unauthorized relocation and institutional placements. The financial burden included:
 - Legal fees associated with filing motions, attending hearings, and seeking enforcement of the original geographic restriction.
 - Costs incurred to address the void No Contact Order and the institutional placements of [REDACTED].
- o **Jurisdictional Confusion and Prolonged Litigation** - The improper reliance on void orders in Parker County created jurisdictional confusion and extended the litigation process. This delay:
 - Prevented timely resolution of custody disputes, prolonging the emotional toll on both [REDACTED] and Wright.
 - Eroded Wright's ability to exercise his parental rights and protect [REDACTED]'s welfare.
- o **Erosion of Parental Bond** - The combination of Womack's unauthorized relocation, the No Contact Order, and the institutional placements resulted in a near-total erosion of the bond between Rustin Wright and [REDACTED].
 - Wright was deprived of key milestones in [REDACTED]'s life, including his high school years, which were spent in out-of-state boarding schools.
 - [REDACTED]'s trust in his father was diminished due to prolonged separation and emotional manipulation.
- o **Undermining of Judicial Integrity** - The use of void orders in Parker County to facilitate Womack's actions undermined the integrity of the judicial process. These actions created a perception of bias, lack of due process, and failure to uphold the child's best interests, damaging trust in the family court system.

Allegation 2: Fraudulent Representations in Court

- **Specific Action:**

- o On or about **September 15, 2018**, Ashley Womack submitted false statements and misrepresentations in court filings to gain favor in custody disputes. She alleged abuse without evidence and concealed information favorable to Rustin Wright's parental fitness.
- **State Laws Violated:**
 - o **Texas Penal Code § 37.10 – Tampering with Governmental Records** - Ashley Womack violated this statute by knowingly submitting false and misleading court filings as part of a judicial proceeding. Texas Penal Code § 37.10 prohibits creating, presenting, or using a governmental record with knowledge of its falsity and intent to mislead. Womack's court filings contained unsubstantiated claims of abuse and concealed favorable evidence about Rustin Wright's parenting fitness. These misrepresentations directly influenced the judicial record, creating an inaccurate basis for custody decisions and obstructing the court's ability to fairly adjudicate the case.
 - o **Texas Penal Code § 37.09 – Tampering with or Fabricating Physical Evidence** - By submitting false information and withholding relevant evidence in a custody proceeding, Womack violated this statute. Texas Penal Code § 37.09 prohibits altering, destroying, or concealing evidence with the intent to impair its availability in an official proceeding. Womack's deliberate omission of favorable information about Wright's compliance with prior court orders and his role in [REDACTED]'s life effectively tampered with the court's ability to access a complete and truthful evidentiary record.
 - o **Texas Family Code § 153.002 – Best Interests of the Child** - Womack's submission of false allegations and exclusion of relevant information violated the Texas Family Code mandate that all custody decisions be guided by the best interests of the child. Her actions prioritized her personal objectives over [REDACTED]'s welfare, obstructing the court's ability to make informed decisions that considered [REDACTED]'s developmental, emotional, and physical needs.
- **Federal Laws Violated:**
 - o **Fourteenth Amendment to the United States Constitution** - By presenting false allegations and concealing favorable evidence, Womack contributed to a judicial process that violated Rustin Wright's procedural due process rights. The inaccurate filings interfered with Wright's ability to receive fair treatment under the law and obstructed his parental rights without proper adjudication.
- **Explanation:**
 - o On or about **September 15, 2018**, Ashley Womack knowingly submitted false statements and material misrepresentations in court filings during custody proceedings to gain an unfair advantage. These filings accused Rustin Wright of abusive behavior and parental unfitness without providing any corroborating evidence. Womack's allegations directly contradicted existing evidence of Wright's compliance with prior court orders and his demonstrated commitment to [REDACTED] Wright's welfare.

By presenting unsubstantiated claims and omitting favorable information about Wright's parenting, Womack created a distorted judicial record. This misrepresentation obstructed the court's ability to make informed custody decisions based on the best interests of the child, as required by **Texas Family Code § 153.002**.

Womack's actions also violated **Texas Penal Code § 37.10**, which prohibits tampering with governmental records. By knowingly filing court documents with false information, Womack introduced inaccuracies into the official judicial record with the intent to mislead the court. This act undermined the integrity of the legal process and contributed to prolonged litigation.

Womack's omissions and misrepresentations interfered with Rustin Wright's procedural rights, violating his due process protections under the Fourteenth Amendment to the United States Constitution. The fabricated allegations forced Wright to divert time, resources, and emotional energy to defend against baseless claims, further obstructing his ability to advocate for [REDACTED]'s welfare.

These actions caused significant harm to [REDACTED] Wright by prolonging the custody dispute and creating an environment of instability and emotional distress. Womack's intent to discredit Wright for personal gain at the expense of the child's well-being constitutes a breach of her fiduciary duty as a parent to act in [REDACTED]'s best interests.

- **Supporting Evidence:**

- o **Court Filings from on or about September 15, 2018** - Filings by Ashley Womack alleged that Rustin Wright failed to comply with court orders. However, the 2nd Court of Appeals later declared the orders void due to procedural defects in the jurisdictional transfer from Lamar County to Parker County.
- o **ony Disproving Allegations** - Rustin Wright and supporting witnesses including [REDACTED] Wright would be happy to submit testimony emphasizing compliance with valid court orders and his demonstrated commitment to [REDACTED] Wright's welfare. These testimonies will directly contradict Womack's claims.
- o **2nd Court of Appeals Ruling** - The 2nd Court of Appeals invalidated all court orders from Parker County due to jurisdictional defects, undermining the basis of Womack's allegations against Wright.
- o **Impact on Custody Proceedings** - Transcripts and court records document procedural delays and emotional harm stemming from the false allegations, prolonged litigation, and invalid enforcement of void orders.

- **Impact:**

- o **Prolonged Custody Disputes** - The unsubstantiated allegations made by Ashley Womack led to extended litigation, causing delays in resolving custody matters. These delays were further exacerbated by the enforcement of court orders later declared void by the 2nd Court of Appeals.
- o **Emotional and Financial Harm to Rustin Wright** - Wright faced significant emotional distress and financial strain due to the need to defend against baseless claims. The prolonged litigation diverted resources from parenting responsibilities and inflicted undue hardship.
- o **Harm to [REDACTED] Wright** - [REDACTED] experienced emotional instability due to the prolonged legal battle. The false allegations and resulting delays in custody resolution created an environment of uncertainty and distress, impacting his overall well-being.

- o **Undermined Judicial Process** - The false allegations distorted the judicial record, obstructing the court's ability to make custody determinations based on the best interests of the child as required under Texas Family Code § 153.002.
- o **Erosion of Procedural Integrity** - The reliance on invalid orders later declared void by the 2nd Court of Appeals highlights systemic failures in upholding jurisdictional standards. This undermined Wright's procedural rights and the fairness of the custody proceedings.

Allegation 3: Neglect and Emotional Harm to [REDACTED] Wright

- **Specific Action:**

- o **Between 2018 and 2023**, Ashley Womack subjected [REDACTED] Wright to prolonged emotional neglect and abuse, causing significant harm to his psychological well-being. During this period, Womack repeatedly failed to provide [REDACTED] with a stable and supportive environment, instead exposing him to emotional manipulation and undue isolation. Her actions included unjustly confining [REDACTED] to the Dallas Juvenile Detention Center for a night, followed by placement at Resolution Ranch Academy, a reform boarding school, during his freshman year of high school. For the remainder of his high school years, Womack sent [REDACTED] to an all-boys Catholic boarding school in Omaha, Nebraska, where he was entirely isolated from his father, Rustin Wright.

Throughout these years, Womack knowingly and willingly interfered with [REDACTED]'s parent-child relationship with his father, preventing any contact between them until [REDACTED] turned 18. This interference disrupted a secure attachment that is critical for healthy emotional development and directly contributed to [REDACTED]'s psychological distress, as documented in professional evaluations. Womack's decisions deprived [REDACTED] of the stability, support, and nurturing environment essential for his well-being, creating a prolonged period of emotional harm.

As a parent with an educational background that includes knowledge of child development, Womack was fully aware of the importance of stable parental relationships for [REDACTED]'s emotional health and growth. Despite this, her actions prioritized personal objectives and punitive measures over [REDACTED]'s best interests, causing irreparable harm during his formative years.

- **State Laws Violated:**

- o **Texas Penal Code § 22.04** **Interference with a Child** - Ashley Womack violated Texas Penal Code § 22.04 by subjecting [REDACTED] Wright to prolonged emotional harm and neglect between 2018 and 2023. Her actions disrupted [REDACTED]'s emotional and psychological stability, creating an environment of instability and distress during critical developmental years. By failing to provide a stable and nurturing environment, Womack caused significant harm to [REDACTED]'s well-being. Her interference in [REDACTED]'s secure attachment to his father, Rustin Wright, directly contributed to his emotional suffering, undermining a parent-child relationship that is essential for healthy development.

Womack knowingly engaged in emotional manipulation to alienate [REDACTED] from his father and influence custody proceedings to her advantage. Her decisions, including repeated litigation and unfounded accusations, introduced prolonged conflict into [REDACTED]'s life,

heightening his emotional instability. Expert evaluations, including the findings of Dr. Brooks McKenzie, document the severe psychological harm inflicted on [REDACTED] most certainly because of these actions. These evaluations confirm that Womack's behavior disrupted [REDACTED]'s secure attachment patterns and caused him measurable emotional distress.

Under **Texas Penal Code § 22.04**, an individual commits injury to a child through intentional, knowing, reckless, or negligent acts that result in physical or emotional harm. Womack's conduct demonstrates a willful disregard for [REDACTED]'s psychological needs and developmental welfare. By failing to protect [REDACTED]'s best interests, she caused direct harm, violating her parental duty to act in his favor. Her behavior created lasting damage to [REDACTED]'s emotional health, as evidenced by expert reports, court filings, and testimonies that document his distress.

The actions taken by Ashley Womack align precisely with the statutory definitions of injury to a child. Her failure to prioritize [REDACTED]'s emotional and psychological needs, combined with deliberate interference in his relationship with his father, constitutes a clear violation of Texas law. This misconduct not only harmed [REDACTED] but also undermined the foundational principles of care and stability that every child deserves.

- o **Violation of Texas Family Code § 261.001(1)(C) – Emotional Abuse** - The Texas Family Code defines emotional abuse as acts or omissions that cause substantial harm to a child's emotional development or well-being. Specifically, **§ 261.001(1)(C)** encompasses:

- Conduct that resulted in significant emotional or psychological harm to a child.
- Behavior designed to undermine a child's emotional development or attachment to a parent.

Womack's actions meet this definition in several ways:

- **Emotional Manipulation:** Womack knowingly engaged in behavior designed to alienate [REDACTED] from his father, a relationship vital to his emotional health. This included creating false narratives and using litigation to exacerbate [REDACTED]'s emotional instability.
- **Neglect of Emotional Needs:** Womack failed to provide a nurturing, stable environment, contributing to [REDACTED]'s ongoing psychological distress. Evidence, including expert evaluations, highlights the substantial harm caused by this neglect.
- **Interference with Emotional Development:** By prioritizing conflict and personal gain over [REDACTED]'s well-being, Womack disrupted his attachment patterns, creating lasting damage to his emotional health.

- **Explanation:**

- o Between **2018 and 2023**, Ashley Womack engaged in actions that caused significant emotional harm to [REDACTED] Wright, constituting violations of **Texas Penal Code § 22.04 – Injury to a Child** and **Texas Family Code § 261.001(1)(C) – Emotional Abuse**. These actions included emotional manipulation, neglect of [REDACTED]'s psychological needs, and deliberate interference in his relationship with his father, Rustin Wright. Womack's behavior disrupted [REDACTED]'s emotional stability during critical developmental years, creating lasting harm to his well-being.

Womack knowingly prioritized personal objectives over [REDACTED]'s welfare, using repeated litigation and false accusations to manipulate custody proceedings. This behavior introduced prolonged instability into [REDACTED]'s life, directly undermining his emotional development. By alienating [REDACTED] from his father which is a relationship essential for secure attachment and psychological health—Womack disregarded her parental duty to act in [REDACTED]'s best interests.

Under **Texas Penal Code § 22.04**, Womack's failure to provide a stable and nurturing environment satisfies the statutory definition of injury to a child, which includes harm caused by intentional, reckless, or negligent conduct. Additionally, her actions meet the criteria for emotional abuse under **Texas Family Code § 261.001(1)(C)**, as they caused substantial harm to [REDACTED]'s emotional development. Reports from experts, such as Dr. Brooks McKenzie, confirm that [REDACTED] suffered measurable psychological harm due to Womack's actions.

Womack's decisions to manipulate [REDACTED]'s perceptions of his father and obstruct his ability to maintain a secure attachment demonstrate a knowing and intentional disregard for [REDACTED]'s well-being. These actions resulted in documented emotional distress, disrupted attachment patterns, and instability that significantly impacted [REDACTED]'s quality of life. The harm caused was preventable and avoidable, making Womack's behavior a clear violation of both statutes and a betrayal of her responsibility as a parent to prioritize [REDACTED]'s emotional and developmental needs.

- **Supporting Evidence:**

- o **Professional Psychological Evaluations** - Reports, including those by Dr. Brooks McKenzie, document [REDACTED] Wright's emotional distress, disrupted attachment patterns, and the psychological harm caused by prolonged separation from his father. Evaluations highlight the lasting effects of Womack's decisions, including isolation and manipulation, on [REDACTED]'s mental health.
- o **Unjust Confinement and Isolation:**
 - **Dallas Juvenile Detention Center:** [REDACTED] was unjustly detained at the Dallas Juvenile Detention Center for a night, an experience that caused emotional trauma and further instability during his formative years.
 - **Resolution Ranch Academy (Freshman Year):** Womack sent [REDACTED] to this reform boarding school, where he was isolated from his father, Rustin Wright. This decision removed [REDACTED] from his family support system, exacerbating his emotional distress.
 - **All-Boys Catholic Boarding School in Omaha, NE (Sophomore–Senior Years):** [REDACTED] was subsequently placed in another boarding school, where he remained isolated from his father throughout his high school years. Despite repeated attempts, Rustin Wright was not allowed to see or speak with [REDACTED] until [REDACTED] turned 18. This prolonged separation disrupted the secure attachment between father and son and caused irreparable harm to [REDACTED]'s psychological development.

- o **Testimonies** - ██████ Wright's statements confirm the significant emotional harm he experienced due to unjust confinement, separation from his father, and the isolating environments imposed by Womack. Witness testimonies corroborate ██████'s psychological struggles and emphasize the emotional harm caused by Womack's actions.
- o **Court Records** - Documentation of Womack's decisions to enforce these isolating measures highlights a deliberate effort to interfere with ██████'s relationship with his father. These decisions prioritized punitive actions over ██████'s emotional and psychological needs. The prolonged litigation further delayed opportunities for resolution and contributed to ██████'s sense of instability.
- o **Impact of Prolonged Custody Disputes and Separation** - Legal and psychological records demonstrate that the extended period of separation from his father, coupled with unjust confinement and boarding school placements, compounded ██████'s emotional distress. These actions deprived ██████ of a stable parental relationship, a foundational aspect of healthy emotional development.
- o **Educational and Parental Responsibility** - Womack's knowledge of child development underscores her understanding of the harm caused by isolating ██████ from his father. Her decisions to enforce these punitive and isolating measures reflect a deliberate disregard for ██████'s emotional and developmental needs.
- o Ashley Womack's decisions to unjustly detain ██████ isolate him in reform and boarding schools, and prevent him from maintaining any contact with his father violated ██████'s fundamental rights and caused significant emotional harm. These actions, compounded by prolonged litigation and emotional manipulation, directly align with violations of Texas Penal Code § 22.04 and Texas Family Code § 261.001(1)(C). ██████'s separation from his father until he turned 18 deprived him of critical emotional support during key developmental years, creating long-lasting psychological harm.

- **Impact:**

- o Ashley Womack's actions between 2018 and 2023 caused profound and lasting harm to ██████ Wright's emotional and psychological well-being. Her repeated decisions to isolate ██████ from his father, Rustin Wright, disrupted a secure parent-child relationship vital to ██████'s development. The emotional harm inflicted was exacerbated by Womack's manipulation and unjust measures, including placing ██████ in the Dallas Juvenile Detention Center for a night and subsequently isolating him in boarding schools throughout his high school years. During this time, Womack prevented all contact between ██████ and his father, creating a prolonged period of instability, emotional distress, and loss of a critical support system.

The impact on ██████'s psychological health is documented in professional evaluations, which highlight the detrimental effects of Womack's interference. These actions disrupted ██████'s ability to form and maintain secure emotional attachments, leaving lasting scars on his emotional and developmental well-being. ██████'s sense of trust in caregivers and stability was severely undermined, contributing to a prolonged period of emotional suffering during formative years.

The separation from his father and the isolating environments Womack imposed further compounded [REDACTED]'s emotional distress. The lack of contact with his father deprived [REDACTED] of the support, guidance, and nurturing essential for his growth and well-being. The prolonged litigation and unfounded accusations initiated by Womack also delayed resolution, creating additional stress for [REDACTED] and contributing to an environment of uncertainty.

Womack's actions not only harmed [REDACTED] but also inflicted emotional and financial burdens on Rustin Wright. Wright was forced to expend significant time and resources defending against Womack's manipulative tactics while being deprived of his parental rights and opportunities to support [REDACTED]. The cumulative effect of these actions demonstrates a profound failure to act in [REDACTED]'s best interests, resulting in significant and preventable harm to his emotional and psychological health.

Allegation 4: Interference with Father-Child Relationship

- **Specific Action:**

- o Ashley Womack's interference with the agreed and last valid court-order demonstrated a clear intent to disrupt [REDACTED] Wright's relationship with his father, Rustin Wright. By denying visitation and failing to comply with parenting time rules, she not only violated legal mandates but also caused significant harm to [REDACTED] emotional health. Womack's actions intentionally prolonged the separation between father and son, preventing [REDACTED] from accessing the stability and emotional support that his father could provide.

Through emotional manipulation, Womack influenced [REDACTED] to distance himself emotionally from his father, further exacerbating the damage. This manipulation undermined [REDACTED] trust in his father and disrupted the secure attachment critical for his psychological development. The prolonged period of separation, coupled with Womack's deliberate noncompliance with valid court orders, demonstrates a pattern of behavior designed to alienate [REDACTED] from his father and deprive him of a meaningful parental relationship.

- **Statutes Violated:**

- o **Texas Penal Code § 25.03 – Interference with Child Custody** - Ashley Womack violated § 25.03 by knowingly failing to comply with the [REDACTED] court order, which granted Rustin Wright specific visitation and parenting time with [REDACTED] Wright. This statute prohibits any person from taking or retaining a child in violation of a court order, including unjustly denying a parent their legal right to custody or visitation. Womack's repeated actions of preventing visitation and refusing to return [REDACTED] to his father contravened these legal provisions and directly interfered with [REDACTED] Wright's custodial rights.
- o **Texas Penal Code § 22.04 – Injury to a Child** - Womack's actions caused significant emotional harm to [REDACTED] satisfying the statutory definition of injury to a child under § 22.04. This statute defines injury to a child as emotional distress caused by intentional, knowing, or reckless acts or omissions. By isolating [REDACTED] from his father, manipulating him to emotionally distance himself, and subjecting him to prolonged separation, Womack inflicted measurable psychological harm as documented in professional evaluations.

- o **Texas Family Code § 261.001(1)(C) – Emotional Abuse (Definition of Child Abuse)** - Under the Texas Family Code, child abuse includes “emotional or mental injury to a child that results in an observable and material impairment in the child’s growth, development, or psychological functioning.” Womack’s deliberate interference with [REDACTED]’s relationship with his father constitutes emotional abuse. Her actions disrupted [REDACTED]’s emotional development by depriving him of the nurturing relationship with his father, resulting in observable psychological harm as documented in expert evaluations and testimonies.
- **Explanation:**
 - o [REDACTED] Womack’s actions violated valid court orders, intentionally interfering with [REDACTED] Wright’s relationship with his father, Rustin Wright. Her persistent refusal to comply with [REDACTED] court orders prolonged the separation between father and son, depriving [REDACTED] of the stability and emotional support essential for his well-being. Through [REDACTED] emotional manipulation, Womack fostered emotional distance between [REDACTED] and his father, further harming [REDACTED] psychological health. The prolonged separation and emotional manipulation disrupted [REDACTED]’s secure attachment to his father and caused significant emotional distress, as documented in professional evaluations and court records.
- **Supporting Evidence:**
 - o **Court Orders** - Parenting plans and visitation schedules outlining Rustin Wright’s rights to visitation and parenting time. Evidence of Ashley Womack’s repeated noncompliance with these court orders, as documented in court records.
 - o **Motions, Affidavits and Testimony from Rustin Wright** - Communications and legal filings detailing Womack’s interference with visitation and parenting time. Testimony from Wright describing his efforts to maintain a relationship with [REDACTED] and the barriers created by Womack.
 - o **Testimony from [REDACTED] Wright** - Statements from [REDACTED] highlighting the emotional impact of being separated from his father and the harm caused by Womack’s actions.
 - o **Professional Evaluations** - Expert reports documenting [REDACTED]’s emotional distress and linking it to the prolonged separation from his father.
- **Impact:**
 - o **Emotional and Psychological Harm to [REDACTED] Wright** - Womack’s persistent interference and manipulation caused observable psychological harm to [REDACTED], as documented in professional evaluations and testimony. [REDACTED]’s separation from his father disrupted [REDACTED]’s secure attachment necessary for his emotional stability and development. [REDACTED] experienced emotional distress, confusion, and mistrust due to the prolonged separation from his father. This manipulation undermined his sense of stability, contributing to attachment issues and emotional insecurity during critical developmental years. Expert evaluations link [REDACTED]’s behavioral changes and psychological challenges, including signs of anxiety and depression, directly to the prolonged separation from his father.
 - o **Increased Legal and Financial Burden on Rustin Wright** - Rustin Wright incurred substantial financial costs in his attempts to enforce the valid court orders for visitation and address Womack’s interference. These costs included legal fees, court-related

expenses, and the diversion of resources that could have been used to support [REDACTED] education and well-being. The ongoing legal battles caused significant emotional distress on Wright, as he fought to maintain his parental rights and provide stability for [REDACTED].

- o **Undermined Parental Relationships and Stability** - Womack's actions erode [REDACTED]'s trust in parental relationships, depriving him of the emotional support and guidance from a healthy relationship with his father could provide. The prolonged period of separation created a void in [REDACTED]'s formative years, limiting his ability to receive consistent paternal presence. This separation may have long-term consequences for [REDACTED]'s ability to form healthy, trusting relationships in adulthood.
- o **Systemic Delays and Enforcement Gaps** - The interference with the father-child relationship effectively compounded the harm caused to [REDACTED]. Delays in addressing Womack's noncompliance allowed the separation to persist, prolonging [REDACTED]'s emotional distress and denying him timely reunification with his father.

Summary of Ashley Womack's Alleged Violations

1. **Interference with Child Custody (June 2015 until [REDACTED] turned 18 years of age)** - Ashley Womack unlawfully relocated [REDACTED] Wright from Lamar County to Parker County in violation of a valid court-ordered geographic restriction. This relocation disrupted the custody arrangement, deprived Rustin Wright of his custodial rights, and caused significant jurisdictional confusion. Womack further relied on void orders issued by Parker County courts to sever the father-son relationship, including a No Contact Order and institutional placements for [REDACTED], which exacerbated the emotional and psychological harm to both [REDACTED] and Rustin Wright.
2. **Fraudulent Representations in Court** – Beginning on or about **September 15, 2018**, Womack knowingly submitted false statements and misrepresentations in court filings to gain an unfair advantage in custody disputes. These filings included unsubstantiated claims of abuse against Rustin Wright and omissions of evidence favorable to his parenting fitness. Her actions misled the court, prolonged custody disputes, and caused emotional harm to [REDACTED] and financial harm to Wright, violating Texas Penal Code provisions prohibiting tampering with governmental records and fabricating evidence.
3. **Neglect and Emotional Harm to [REDACTED] Wright (2018–December 29, 2022)** - Womack failed to provide a stable and supportive environment for [REDACTED], subjecting him to prolonged emotional neglect. Her actions included unjustly confining [REDACTED] to the Dallas Juvenile Detention Center for a night and isolating him in boarding schools, where he remained separated from his father throughout his high school years. This neglect caused significant emotional harm to [REDACTED], disrupting his secure attachment to his father and leading to documented psychological distress, including anxiety and attachment issues.
4. **Interference with Father-Child Relationship (2018–December 29, 2022)** - Womack deliberately obstructed Rustin and [REDACTED] Wright's relationship with void orders, effectively alienating [REDACTED] from his father. Her actions included denying all access, refusing to comply with valid court orders, and emotionally manipulating [REDACTED] to distance him from his father. This interference disrupted the father-son bond, caused emotional harm to [REDACTED] and undermined his trust in parental relationships, depriving him of a meaningful and nurturing relationship with his father during critical developmental years.

State Laws Violated:

- o **Texas Penal Code § 25.03 – Interference with Child Custody** - Womack knowingly violated valid court orders by unlawfully relocating █████ Wright and obstructing Rustin Wright's parenting time, depriving him of his custodial rights and damaging the father-son relationship.
- o **Texas Penal Code § 37.10 – Tampering with Governmental Records** - Womack knowingly submitted false court filings to mislead judicial proceedings, including unsubstantiated claims and omissions of key information, influencing custody outcomes through fraudulent means.
- o **Texas Penal Code § 37.09 – Tampering with or Fabricating Physical Evidence** - Womack concealed favorable evidence and knowingly introduced false information, impairing the availability of truthful records for court proceedings.
- o **Texas Penal Code § 22.04 – Injury to a Child** - Womack's actions caused emotional harm to █████ by creating instability, subjecting him to neglect, and interfering with his secure attachment to his father, resulting in measurable psychological distress.
- o **Texas Family Code § 153.002 – Best Interests of the Child** - Womack violated the Family Code's requirement that custody decisions prioritize the child's welfare by submitting false allegations, withholding evidence, and disrupting █████ relationship with his father.
- o **Texas Family Code § 261.001(1)(C) – Emotional Abuse (Definition of Child Abuse)** - Womack's conduct, including emotional manipulation and neglect, caused substantial harm to █████'s emotional and psychological development, meeting the statutory definition of child abuse.

• Federal Laws Violated:

- o **18 U.S.C. § 241 – Conspiracy Against Rights** - Womack collaborated with others to enforce void orders, obstruct visitation, or isolate █████, so it constitutes a conspiracy to deprive both Wright and █████ of their constitutionally protected rights to familial integrity and fair judicial processes.
- o **18 U.S.C. § 1503 – Obstruction of Justice** - Womack's false court filings, misrepresentations, and concealment of evidence obstructed the administration of justice by interfering with fair custody determinations. These actions delayed proceedings, misled the court, and impaired Wright's ability to defend his rights and advocate for █████'s welfare.
- o **18 U.S.C. § 1962 – Racketeer Influenced and Corrupt Organizations Act (RICO)** - Womack's repeated acts of fraudulent filings, misuse of court systems, and reliance on void orders form a pattern of racketeering activity. This pattern involved collaboration with others in an enterprise such as attorneys, court officials, or other parties so it constitutes a RICO violation. **Predicate Acts:** Interference with child custody, tampering with records, fabricating evidence, and conspiracy to deprive constitutional rights. These

acts demonstrate a repeated and coordinated effort to undermine Wright's parental rights and [REDACTED]'s well-being.

- o **Fourteenth Amendment to the United States Constitution** - Womack's use of void court orders, false filings, and obstruction of visitation deprived Wright of his procedural due process rights, violating constitutional protections of fair treatment and equal protection under the law.

Impact:

- o **Disruption of Custody Agreements** - Ashley Womack's unlawful relocation of [REDACTED] Wright and repeated violations of valid court orders disrupted the court-mandated custody arrangements. Her actions created jurisdictional confusion, prolonged legal disputes, and delayed resolution of custody matters. These delays prevented Rustin Wright from maintaining a consistent relationship with [REDACTED], depriving both father and son of meaningful interaction during critical developmental years.
- o **Emotional Harm to [REDACTED] Wright** - Womack's interference and emotional manipulation caused significant psychological harm to [REDACTED]. Her actions disrupted his emotional stability, resulting in documented emotional distress, including anxiety, attachment issues, and mistrust in parental relationships. The prolonged separation from his father, combined with institutional placements and isolation, exacerbated the harm, leaving lasting effects on [REDACTED]'s well-being.
- o **Undermined Parental Bond** - Womack's deliberate efforts to alienate [REDACTED] from his father undermined the secure attachment essential for [REDACTED]'s emotional health. The extended separation eroded [REDACTED]'s trust in his father, creating barriers to rebuilding their relationship even after he reached adulthood.
- o **Increased Financial Costs to Rustin Wright** - Womack's actions forced Rustin Wright to incur significant legal fees to address her false claims, challenge void orders, and enforce valid court decisions. The financial burden diverted resources that could have been used to support [REDACTED]'s education, development, and well-being, further compounding the harm caused by Womack's misconduct.
- o **Erosion of Judicial Integrity** - Womack's reliance on fraudulent representations, void orders, and noncompliance with court mandates undermined the integrity of the judicial process. Her actions contributed to delays in justice, distorted judicial records, and weakened trust in the court's ability to act in the best interests of the child.
- o **Lasting Psychological and Emotional Damage** - The compounded effects of Womack's interference, manipulation, and neglect created long-term emotional and psychological challenges for [REDACTED]. These include difficulty forming healthy relationships, mistrust in caregivers, and unresolved emotional trauma stemming from prolonged instability during formative years.

Ashley Womack's actions had a profound and multi-faceted impact on [REDACTED] Wright, Rustin W [REDACTED] and the judicial system. Her disregard for legal orders, [REDACTED] nal neglect of [REDACTED], and efforts to alienate him from his father caused preventable harm that will l [REDACTED] ve lasting consequences for all parties involved.

Recommended Actions Against Ashley Womack

- 1. Criminal Investigation and Prosecution** - A comprehensive criminal investigation should be initiated to address Ashley Womack's conduct, focusing on her violations of state and federal laws. These include Texas Penal Code § 25.03 – Interference with Child Custody, for unlawfully relocating █████ Wright and obstructing Rustin Wright's custodial rights; Texas Penal Code §§ 37.10 and 37.09, for tampering with governmental records and fabricating evidence in judicial proceedings; and Texas Penal Code § 22.04 and Texas Family Code § 261.001(1)(C), for causing emotional harm and neglecting █████'s psychological needs. Federal laws also warrant scrutiny, including 18 U.S.C. § 241 (Conspiracy Against Rights), 18 U.S.C. § 1503 (Obstruction of Justice), and 18 U.S.C. § 1962 (RICO), if her actions involved collaboration with others to violate parental and due process rights. Criminal prosecution should be pursued to hold Womack accountable for the harm caused to █████ Wright and the obstruction of Rustin Wright's custodial rights, ensuring that the justice system appropriately addresses her misconduct.
- 2. Restitution for Harm Caused** - Ashley Womack should be required to provide financial restitution to Rustin Wright and █████ Wright to address the significant harm her actions caused. This includes reimbursement for legal costs incurred by Rustin Wright to challenge Womack's actions, enforce valid court orders, and address void orders. Restitution should also compensate █████ Wright for the emotional harm and psychological distress caused by prolonged separation from his father and institutional isolation. Additionally, Womack should compensate for missed opportunities, including the impact of her actions on █████'s developmental and educational prospects. Restitution ensures that the financial and emotional burdens placed on █████ and Rustin Wright due to Womack's conduct are acknowledged and addressed.
- 3. Public Disclosure of Investigative Findings** - The findings of investigations into Ashley Womack's conduct should be publicly disclosed to ensure transparency and accountability. Public disclosure serves critical purposes: it raises awareness of the misuse of legal processes to deprive parental rights and the consequences of such actions; it supports restoration of trust in the judicial system by reinforcing its commitment to upholding custodial rights and prioritizing the best interests of children; and it acts as a deterrent, emphasizing the legal and societal consequences of similar misconduct. Transparency in the investigative process underscores the importance of fairness and accountability in matters affecting child welfare and parental rights.

IV. SYSTEMIC PATTERNS OF MISCONDUCT

The Parker County criminal complaint documents a pervasive and deliberate pattern of judicial and administrative misconduct spanning several years. These actions are not isolated incidents but part of a broader system of failures characterized by repeated violations of statutory requirements, suppression of critical evidence, and retaliatory measures against lawful legal challenges. The evidence points to systemic failures that stem from intentional misconduct, gross negligence, or both, by key judicial officials and attorneys operating within Parker County's legal system. These failures have profoundly undermined due process rights and public confidence in the integrity of the judiciary.

Systemic Impact of Misconduct

The systemic misconduct outlined in this complaint has resulted in severe and far-reaching consequences, including:

1. **Erosion of Judicial Integrity** - The repeated issuance of void orders and improper rulings without jurisdiction has eroded public trust in the judiciary's impartiality. The perception of collusion, bias, and disregard for legal standards undermines the foundation of a fair and trustworthy legal system.
2. **Obstruction of Due Process** - Critical evidence, including testimony detailing abuse allegations, was suppressed, or excluded, denying the complainant and their child the protections afforded under the law. Procedural safeguards were systematically ignored, preventing fair hearings and appeals.
3. **Financial and Emotional Harm** - Prolonged litigation resulting from void orders and procedural delays caused significant financial burdens and emotional distress for the complainant. Punitive sanctions and restrictive custody rulings further exacerbated the harm to the complainant and their child.
4. **Misuse of Legal Precedents** - Judicial decisions based on manipulated or void rulings have established dangerous precedents that threaten the proper administration of justice in future cases, creating a ripple effect that extends beyond this complaint.
5. **Institutional Failures** - The persistent nature of these violations highlights systemic breakdowns in oversight and accountability within the Parker County judiciary. Mechanisms meant to prevent such misconduct failed to identify or correct these patterns, allowing them to continue unchecked.

Conclusion

The systemic patterns of misconduct described in this complaint reveal a judiciary operating outside the boundaries of legal and ethical accountability. The deliberate and coordinated actions of judges, attorneys, and administrative personnel have created a system where due process is routinely denied, and the integrity of the judicial process is compromised. These failures demand urgent and decisive action to restore public confidence, uphold the rule of law, and ensure the protection of constitutional and statutory rights for all citizens. Immediate investigation and accountability measures are essential to addressing these systemic deficiencies and preventing future harm.

8. RELIEF

This Affiant, **Rustin Wright**, am DEMANDING the following Relief:

V. REQUESTED ACTIONS

The systemic misconduct, statutory violations, and ethical breaches detailed in this complaint regarding Parker County demand immediate and decisive action to restore judicial integrity, accountability, and public trust. The following actions are respectfully requested:

1. Immediate Independent Investigation

- **Description:**
 - o An impartial and thorough investigation must be conducted by state and federal authorities, including but not limited to:
 - **The State Commission on Judicial Conduct**
 - **The State Bar of Texas**
 - **The Office of the Attorney General of Texas**
 - **The U.S. Department of Justice (DOJ)**
 - **The Federal Bureau of Investigation (FBI)**
 - o The investigation must encompass all parties named in this complaint and focus on:
 - Issuance of void and fraudulent court orders.
 - Suppression of evidence and obstruction of justice.
 - Tampering with government records and misrepresentation of legal facts.
 - Retaliatory judicial actions against lawful challenges.
- **Outcome Desired:**
 - o A detailed investigative report identifying specific violations and responsible parties.
 - o Recommendations for disciplinary actions and criminal prosecution where warranted.
- **Impact:**
 - o Ensures impartial accountability for misconduct.
 - o Restores public confidence in judicial oversight mechanisms.

2. Criminal Prosecution for Statutory Violations

- **Description:**
 - o Criminal charges must be filed where evidence supports statutory violations under both state and federal law, including but not limited to:
 - Tampering with Government Records (Texas Penal Code § 37.10)
 - Abuse of Official Capacity (Texas Penal Code § 39.02)
 - Obstruction of Justice (18 U.S.C. § 1503)
 - Deprivation of Rights Under Color of Law (18 U.S.C. § 242)
 - Conspiracy Against Rights (18 U.S.C. § 241)
 - o Prosecution should include Judge Graham Quisenberry, Judge David Evans, Attorneys Stephen Lawrence and Robert A. Thornton, Amicus Attorney Zachary Q. Pettigrew, and Ashley Womack.
- **Outcome Desired:**
 - o Criminal charges filed against individuals found to have violated state and federal laws.
 - o Appropriate legal consequences, including fines, suspensions, and imprisonment where applicable.
- **Impact:**
 - o Deters future misconduct through accountability.
 - o Demonstrates a commitment to upholding the rule of law regardless of rank or position.

3. Full Financial Restitution and Compensation

- **Description:**
 - o Restitution must be provided to cover all financial damages incurred as a direct result of the misconduct, including but not limited to:
 - Legal fees and court costs resulting from challenging void orders and repeated delays.
 - Emotional distress damages caused by judicial misconduct and procedural abuse.

- Reimbursement for financial losses related to enforcement of fraudulent court orders.
 - o Compensation should also address long-term impacts on the complainant's life, finances, and emotional well-being.
- **Outcome Desired:**
 - o Full reimbursement of legal expenses and financial damages caused by the misconduct.
 - o Compensation for emotional and psychological harm caused by prolonged litigation and abuse of power.
- **Impact:**
 - o Provides fair compensation for the harm caused by judicial misconduct.
 - o Reinforces the principle that violations of public trust carry consequences.

4. Referral to Professional Oversight Bodies

- **Description:**
 - o Referral of attorneys, judges, and other officials involved in the misconduct to their respective oversight and licensing authorities:
 - **State Bar of Texas** (Attorneys Stephen Lawrence, Robert A. Thornton, and Zachary Q. Pettigrew)
 - **State Commission on Judicial Conduct** (Judge Graham Quisenberry)
 - o These bodies must conduct thorough investigations into ethical breaches, professional misconduct, and statutory violations.
- **Outcome Desired:**
 - o License suspension, disbarment, or removal from office for individuals found guilty of professional misconduct.
 - o Public reporting of disciplinary outcomes to ensure transparency.
- **Impact:**
 - o Reinforces ethical and professional standards in the legal community.
 - o Deters attorneys and judges from engaging in similar misconduct.

Conclusion

The requested actions outlined above are essential to ensure accountability, restitution, and systemic reform within the judicial and administrative systems in Parker County. These measures are not merely punitive. They are corrective and preventive, aimed at restoring public confidence and safeguarding future judicial integrity. Immediate action is necessary to address these grave violations and prevent further harm.

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 record, that you do, with full known malice and intent, support the unlawful abrogation of the Peoples' Constitutional rights, **a violation of your oath to the Constitutions of these United States, including the Texas Constitution, Article 16, Section 1.**

Please take notice that all responses not Verified and submitted under penalty of perjury **WITHIN 30 DAYS** are non-responses and shall consent to all claims herein.