

Glaring evidence of fraud → Does excellent work!
Susan E. Abbey
Board Certified Document Examiner

Phone: (214) 343-1874 Voice Mail: (214) 395-6140
www.handwritingexpert.com

Good evidence of Frenelle and Coffey's fraud.

May 18, 2022

TO: Patrick Wright
The Wright Firm L.L.P.
1760 S. Stemmons Frwy., Suite 100
Lewisville, TX 75067

*The forged affidavit is at the end of these 18 pages.

RE: Case No. 15-10574-211 481st District Court-Family Denton County, Texas In the Interest of R.B.P. a child.

REQUEST: To examine two affidavits filed regarding the above referenced case to determine if they originated from the same source.

DOCUMENTS EXAMINED:

All copies

Two documents attached to the Amended Application for Temporary Restraining Order and Injunction filed by [REDACTED] Petitioner dated 1/28/22.

Exhibit A- Affidavit of [REDACTED] dated 1/27/22 and notarized by Alisha Morgan (highly corrupt) → paralegal

Exhibit B- Affidavit of Jennifer Frenelle (child custody evaluator for this case) dated 1/28/22 and also notarized by Alisha Morgan.

These documents are attached to this report.

Soulless puppet, fully complicit in her master's fraud
Master = corrupt to the core attorney
Amanda Coffey

FINDINGS:

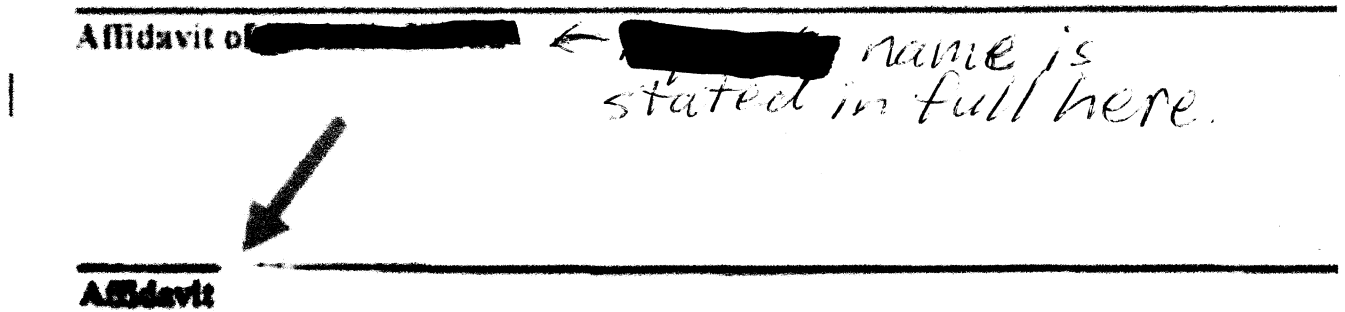
I made the following observations on the above listed documents:

1. Both Exhibit A and Exhibit B have the same wording and styling from the "STATE OF TEXAS" down to the end of paragraph 2 on page 1 of both Exhibits.
2. Both Exhibit A and Exhibit B have the same wording and styling at the bottom of page 1 for Exhibit A and page 3 for Exhibit B from the part "Further Affiant sayeth not." downward to the footer at the bottom of the page.
3. Both used Times New Roman fonts (a commonly used font). Both used space justification (also commonly used). Because I examined copies rather than originals it was not possible to determine if the fonts were the same size or not, but they appeared very similar with differences possibly due to the copying process and bolded font on Exhibit B, pages 1 and 2, but not page 3.

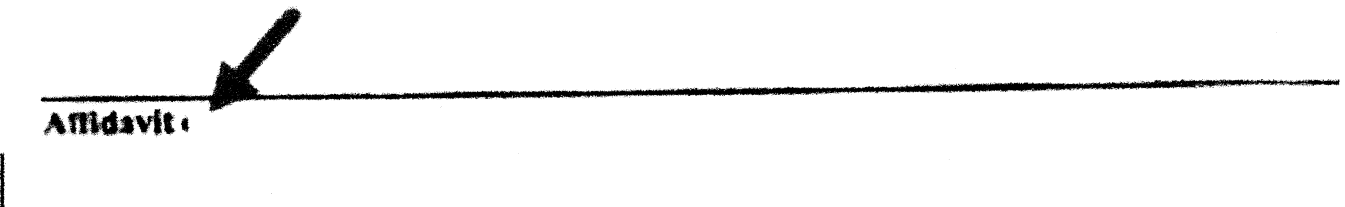
Amanda Coffey: [REDACTED] slimeball, nicotine junkie attorney [REDACTED]

- Exhibit A was scanned in color. Exhibit B pages 1 and 2 were black and white, but page 3 (which contains the notary information only) is in color.
- The footer on Exhibit B, shows signs of erasure or obliteration after the word "Affidavit". This evidence is shown below:

Top line is Exhibit A page 1. Bottom is Exhibit B page 1 and Exhibit B page 3.



On Exhibit B (bottom line above) where the red arrow points, is a gap in the line and a thinning of the line near that area, likely due to some sort of attempt to remove the identification of who the Affidavit was for, like on Exhibit A.



The evidence is further shown on Exhibit B page 3 above where the red arrow points to a partial letter such as the "o" used in Exhibit A.

- Both affidavits were notarized by the same notary.

OPINION:

The above findings lead me to conclude that the Affidavit of [redacted] (Exhibit A) and the Affidavit of Jennifer Frenkle (Exhibit B) more likely than not, originated from the same source document used as a template. There are too many similarities for me to believe that they were independently created.

Further examinations of originals would allow me to determine if the signatures on the affidavits were originals or copies, or how the obliterations were made.

Frenkle and Coffey are still of course illegally hiding the "original."

METHODOLOGY:

Various magnifiers, measuring devices, Paperport 14.5 and enlargements were used to carefully compare the known documents to the questioned documents in accordance with generally accepted document examination guidelines and principles as outlined by SWGDOC- Standard Guide for Examination of Altered Documents found on-line at SWGDOC.org.

STATEMENT OF QUALIFICATIONS:

Attached hereto is a copy of my current curriculum vitae which outlines my background and experience to undertake this examination and render an opinion. Attached hereto is a listing of my prior testimonies for the past four years as an examiner of questioned documents and handwriting. Attached hereto is a signed Certificate of Report.

CONCLUDING REMARKS:

If asked to do so, I am willing to testify under oath in a legal proceeding that all statements and representations made in this report are true and accurate to the best of my knowledge and belief, and I would be prepared to demonstrate and explain the reasons expressed for the opinion given. If court testimony is required, I would prepare appropriate court exhibits to illustrate and explain my findings and opinion.

Respectfully submitted,

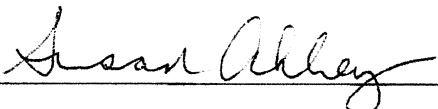


Susan E. Abbey, CDE, D-BFDE
Forensic Document Examiner

CERTIFICATE OF REPORT

The undersigned hereby certifies that, except as otherwise noted in the report to which this certificate is attached:

1. I have no present or prospective interest in the subject of the Report, or in the use of the report.
2. I have no personal acquaintance, knowledge, interest or bias with respect to the parties mentioned in the Report.
3. To the best of my knowledge and belief, the statements of facts contained in the Report, upon which the analysis, opinion, and conclusions expressed in the report, are based on the evidence presented to me, are true, correct and reliable to the best of my knowledge.
4. The analysis, opinions and conclusions set forth in the Report are my personal, unbiased professional analysis, opinions, and conclusions and are limited only by the reported assumptions and limiting conditions set forth in the Report.
5. My compensation is not contingent on an action or event resulting from the analysis, opinion, or conclusions in, or the use of the Report.

By: 

Susan E. Abbey, D-BFDE, CDE
Forensic Document Examiner

Susan E. Abbey

Board Certified Document Examiner

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www.handwritingexpert.com

CURRICULUM VITAE

Specializing in: Scientific Examination of Questioned Documents/Handwriting, Alterations of Documents, Anonymous Notes, Disguised Writing, Desktop Forgery (Computer/Copier/Printer/Fax), Forged/Authentic Signatures, Handwriting Identification, Non-Destructive Ink and Paper Examination

CERTIFICATIONS:

Diplomate- Board of Forensic Document Examiners. Passed a 240 question cognitive exam and 8 part performance examination. The BFDE certification process is accredited by the Forensic Specialties Accreditation Board. Board Certification by the National Association of Document Examiners (NADE). Passed written and oral examinations.

COURT QUALIFICATIONS: Susan Abbey has met and been qualified under the Daubert/Robinson guidelines. She has testified as an expert witness one or more times in the following courts:

U.S. Bankruptcy Court for the Eastern District Louisiana.
U. S. District Court for the Northern District of Texas Dallas Division
U. S. District Court for the Southern District of Texas Houston Division
U. S. Military Court, Fort Sam Houston, Texas
U. S. Bankruptcy Court for the Northern District of Texas, Dallas Division
Sebastian County Circuit Court, Fort Smith District, Civil Division VI Arkansas
Weld County District Court, Colorado
Escambia County First Judicial Circuit Court, Pensacola, Florida
Arbitration Court, Miami, Dade County, FL
District Court of Comanche County, State of Oklahoma
Texas:
224th District Bexar County, Texas
285th District Court Bexar County
438th District Court Bexar County
35th District Court Brown County
103rd District Court Cameron County
Collin County Court-at-Law # 4
219th District Court Collin County
366th District Court Collin County
298th District Court Dallas County
255th District Court Dallas County
193rd District Court Dallas County
191st District Court Dallas County
160th District Court Dallas County

101st District Court Dallas County
95th District Court Dallas County
68th District Court Dallas County
44th District Court Dallas County
14th District Court Dallas County
367th District Court Denton County
Dallas County Court of Law No. 3
Dallas County Criminal Court No. 4
Dallas County JP Court Precinct 5, Place 2
Dallas County Probate Court No. 1
Dallas County Probate Court No. 3
Denton County District Court No. 367
Ellis County Court No. 1
171st District Court El Paso County
Probate Court El Paso County
Galveston County Probate Court
Grand Prairie Municipal Court No. 2
Harris County Probate Court Nos. 1, 2, 3
Harris County 133rd District Court
Harris County 184th Criminal District Court
370th District Court Hidalgo County
354th District Court Hunt County
422nd District Court Kaufman County
271st District Jack County, Texas
County Court at Law #2 Johnson County
414th District McLennan County, Texas
Midland County Court of Law #2
415th District Court Parker County
273rd District, Sabine County, Texas
Tarrant County Probate Court No. 1
Tarrant County District Court Nos. 48, 96, 236, 322

COURT QUALIFICATIONS CONTINUED:

Texas Education Agency SOAH Docket
78th District Court Wichita County

Wise County Court at Law

COURT APPOINTMENTS:

United States District Court for Western District of Oklahoma
United States District Court Western District of Texas Pecos Division
379th Judicial District Bexar County, Texas
42nd District Court, Callahan County, Texas
County Court No. 2 Collin County, Texas
District Court Comal County, Texas
416th Judicial District Court, Collin County, Texas
District Court, Comal County, Texas
394th District Court of Culberson County, Texas
292nd District Court of Dallas County, Texas
332nd District Court of Hidalgo County, Texas
County Court at Law of Houston County, Texas
196th Judicial District Hunt County, Texas
354th Judicial District Hunt County, Texas
249th Judicial District Johnson County, Texas
25th Judicial District Lavaca County, Texas
216th District Court Kendall County, Texas
19th Judicial District McLennan County, Texas
54th Judicial District McLennan County, Texas
258th Judicial District Polk County, Texas
411th Judicial District Polk County, Texas
4th Judicial District Rusk County, Texas
36th Judicial District San Patricio County, Texas
114th District Court Smith County, Texas
Tarrant County Criminal Court No. 1
Tarrant County Criminal Court No. 2
42nd District Court, Taylor County, Texas
299th Judicial District Travis County, Texas
294th Judicial District Van Zandt County, Texas

EDUCATION:

BA Rice University, Houston, Texas, 1980 Business Management.
Forensic Document Examination Course with the National Questioned Document Association (a state licensed school) 1996-1997. Certification of Completion issued 1997.
American Institute of Applied Science, Inc. Course in Questioned Documents Certificate of Completion issued 1997.
Mentored under Linda James, CDE 1997-1998.

PROFICIENCY TESTING: Collaborative Testing Services 2008, 2010, 2013, 2016, 2017, 2020 All questions answered correctly.

CONTINUING EDUCATION:

	615.5 total hrs
September, 2022 NADE Conference Asheville, North Carolina	18 hrs
March, 2021 AAFS Symposium, On-line	10.5 hrs
October, 2019 AFDE Conference, Denton, Texas	21 hrs
June, 2019 NADE Conference, Aberdeen, Scotland	18 hrs

May, 2018 NADE Conference, Atlantic Beach, Florida	24 hrs
October, 2017 AFDE Symposium, Reno, Nevada	21.5 hrs
May, 2017 NADE Conference, New Orleans, Louisiana	25 hrs
October, 2016 AFDE Symposium, Myrtle Beach, South Carolina	19 hrs
April, 2016 NADE Conference, Portland Oregon	26 hrs
October, 2015 AFDE Symposium, San Antonio, Texas	21.5 hrs
April, 2015 SEAK Conference on How to Be an Effective Witness	7.5 hrs
April, 2015 NADE Conference, Nashville, Tennessee	35 hrs
October, 2014 AFDE Symposium Salt Lake City, Utah	20.5 hrs
October, 2013 Hooke College of Applied Sciences, Westmont, Illinois	8 hrs
October, 2013 AFDE Symposium, Chicago, Illinois	20.5 hrs
May, 2013 NADE Conference, Omaha, Nebraska	19 hrs
May, 2012 NADE Conference, San Diego, California	19 hrs
November, 2011 AFDE Symposium, Louisville, Kentucky	20.5 hrs
May, 2011 NADE Pre-Conference Theory and Skills IR/UV and Indented Writing Examinations, Montreal, Canada	14 hrs
May, 2011 NADE Conference, Montreal, Canada	19 hrs
May, 2010 NADE Conference, Portland, Oregon	23 hrs
April, 2008 NADE Pre-Conference, Austin, Texas	27 hrs
April, 2008 NADE Conference, Austin, Texas	14 hrs
May, 2007 NADE Pre-Conference, Forensic Photography, Tucson, Arizona	4 hrs
May, 2007 NADE Conference, Tucson, Arizona	25 hrs
May, 2006 NADE Conference, Mariner of Seas, Caribbean Ocean	19 hrs
May, 2003 NADE Conference, New Orleans, Louisiana	20 hrs
March, 2001 NQDA Conference, Dallas, Texas	14 hrs
October, 2000 NADE Conference, Albuquerque, New Mexico	17 hrs
March, 2000 National Questioned Document Association Conference, Dallas	14 hrs
October, 1998 NADE Conference, New Orleans, Louisiana	23 hrs
August, 1997 Seminar by Linda L. Collins, B.C.D.E. and Kay Micklitz	7 hrs
March, 1997 Seminar by National Questioned Document Association, Dallas	14 hrs
1996 Workshop Lab/Microscopes, Pen and Ink, Equipment	7 hrs

EMPLOYMENT:

East Tennessee State University Adjunct Professor for Forensic Document
Examination graduate degree program 2012- present.
Instructor for National Questioned Document Association Questioned Document
Course 1998- 2009.

PROFESSIONAL ASSOCIATIONS:

NADE (National Association of Document Examiners)
Executive Board position as Treasurer 2007-present.
BFDE (Board of Forensic Document Examiners) - on board with position as
Applications Coordinator.

PUBLISHED RESEARCH PAPERS:

"Natural Variation and Relative Height Proportions" published by Shunderson
Communications in The International Journal of Forensic Document
Examiners, Jan/Dec 1999.
"Handwriting of First and Second Graders: An Observation" published by The
Journal of the National Association of Document Examiners, Fall, 2000,
Volume 24.

Note: Permission to designate or list Susan Abbey as an expert witness, use her name or CV on
any case without payment of retainer is prohibited. Last update 04/22

Susan E. Abbey

Board Certified Document Examiner

Phone: (214) 343-1874 Voice Mail: (214) 395-6140
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CASES TESTIFIED IN LAST 4 YEARS

April 8, 2022 Case No. 493601 In the Probate Court No. 2 Harris County, Texas. In the Estate of Howard Ray Taylor Deceased. Judge Michael Newman, Shane Kersh and Emily Bohls for Bettye Taylor. Opposing attorney Dr. Paula Robnett.

March 28, 2022 Case No. 20-11986 Chapter 11 SBRA Adv. Proc. No. 21-1002 United States Bankruptcy Court for the Eastern District Louisiana. Dennis Perry Debtor, Perry Associates, LLC; Crescent City Property Redevelopment Association, LLC; Crescent City Medical Services, Inc.; Private Connection Auto, LLC; 4330 State Street Drive, LLC; 1100 South Jefferson Davis Parkway, LLC and William Alden individually Plaintiffs v. Dennis A. Perry; Deals on Wheels, LLC Defendants. Judge Meredith Grabill. For the Alden Group, Richard Rozanski Inc. Aplc. Opposing attorney Robin DeLeo LLC for Dennis Perry.

February 23, 2022 Cause No. 479,995 In the Probate Court No. 3 of Harris County, Texas. Estate of Natalia Velasquez. Judge Jason Cox. Deborah Newman of the Newman Law Firm for Velma Buzo. Opposing attorney Jason Klein of Kearney, McWilliams & Davis.

December 6, 2021 Cause No PR-0080302 In the Probate Court of Galveston County, Texas. Estate of George Darras. Judge Kimberly Sullivan. Grace Shoemaker attorney for Sean Steves petitioner. Opposing Robert V. Shattuck.

November 2, 2021 Case No. 01-20-0004-9510 Arbitration, Miami, FL. Rogelio Agrasanchez Linaje, Raymundo Rogelio Agrasanchez, Julio Cesar Agrasanchez Lopez, Jose David Agrasanchez Lopez, Alma Rosa Agrasanchez, Cinematografica Grovas, S.A. de C.V., a Mexican entity, Producciones Filmicas Agrasanchez, S.A. de C.V., a Mexican entity, Churusbusco, S. A. de C.V., a Mexican entity, and Impulsora Mexicana de Peliculas, S.A. de C.V., a Mexican entity, Claimants vs. Alejandro Agrasanchez, Movie Mex International, Inc., a Florida corporation, AAA Film Productions Inc. , a Florida corporation, and Grupo Agrasanchez LLC, a Florida limited liability company, Respondents. Francisco Armada, Melissa J. Gomberg of Nelson Mullins Broad and Cassel Miami, Fl. For the claimants. Opposing attorney Gerardo A. Vazquez of Vazquez & Associates for the respondents.

September 9, 2021 Cause No. 474669 Estate of Theresa Altice, Deceased. Probate Court No. 1 Harris County, Texas. Judge Jerry Simoneaux. Opposing attorney John Henry of Law Offices of John B. Henry III attorney for plaintiff. Sarah Duckers of Sechrist Duckers LLP for defense.

July 26, 2021 67 PR-2020-58-2 In the Matter of the Estate of Emanuel Lee Owen, Deceased, Circuit Court of Sevier County, Arkansas. Judge Brian Cheshire. Attorney for plaintiff Marshall Moore of Moore, Giles and Matteson, LLP. Opposing attorney Laura Lindly.

June 2, 2021 SOAH State Office of Administrative Hearings. Andres Salas v. Lisa Salas. Opposing attorney for plaintiff Andre Salas Keith Pardue of Law Office of Pardue & Associates, PLLC. Attorney for defense Shep Sands of The Ashmore Law Firm, P.C. Closed confidential file.

May 27, 2021 Cause No. 483,384 In the Probate Court No. 2 of Harris County, Texas. Estate of Lurline McGee deceased. Judge Michael Newman. Attorney for plaintiff Jacqueline McGee, John Mikus. Crespin Linton, opposing attorney for defense Carolyn McGee.

December 15, 2020 Cause No 2020-CPR00826 In the Probate Court of El Paso County, Texas. Estate of Gertrud E.W. Calkins deceased. Master/Associate Judge Joseph Strelitz. Jason Scott Cohen of The Law Offices of Jason Scott Cohen, P.C. No opposing attorney.

August 31, 2020-September 1, 2020; Cause No. 2016-CI-06247 In the 224 District Court, Bexar County, Texas. Andrew Bradford West vs Paloma Cattle Company LTD and Oscar Leo Quintanilla. Judge Cathleen Stryker. Attorneys for defense Katrina Eash of Winston Strawn, and David Prichard of Prichard and Young. Opposing attorney Lamont Jefferson of Jefferson Cano.

August 4, 2020 Cause No. 2020-1914-5; Thermos Dynamics Waco LLC v. Joe Garcia, 414th Judicial District Court, McLennan County, Texas. Judge Vickie Menard. Opposing attorney for the plaintiff, Nick Bray with Naman, Howell, Smith & Lee. Gerald Villarrial of Dunnam & Dunnam Attorneys at Law for the defense.

February 18, 2020 Cause No. CV1913713 Beaux Kelly and Carrie Kelly vs. Steven J. Terrell and Katherine A. Terrell In the 273rd Judicial District, Sabine County, Texas. Judge James A. Payne Jr. Opposing attorney was Andrew Gertz of The Gertz Law Firm Beaumont, TX for the plaintiffs, David Smith of The Law Office of David Smith Houston, TX. For the defense.

January 15, 2020 Cause No. DC-19-04299 In the 95th Judicial District, Dallas County, Texas. Joyce Miles v. Dallas N Motor Co. Visiting Judge Ray Wheless. Opposing attorney Rob Hudson of Hutchison and Stoy Fort Worth for plaintiff, Russell Cawyer and Paige Biggs of Kelly Hart for the defense.

September 25, 2019 Cause No. 16-11-131 In the 271st Judicial District Jack County, Texas. Tobey Joe Rich, Individually and as Independent Executor of the Estate of Thomas Joe (T.J.) Rich, deceased; and Mudders, Ballers & Rock Crawlers, LLC plaintiff v. Connie Carol Taylor. Judge Brock Smith. Attorneys Stephen Crawford and Jaclyn Sublett for the plaintiff. Opposing attorney Mr. Chad W. Cannon of the Cannon Law Firm.

August 28, 2019 Cause No. PR-19-1804-2 Dallas County. In the Estate of Juanita W. Beavers. Judge Ingrid M. Warren. Susan Brooks Attorney. No opposing attorney.

July 31, 2019 Texas Division of Insurance, Division of Worker's Compensation hearing. Judge Robert Clarkson. Attorneys Paul Kelley of Paul Kelley Law and John Gibson of the Gibson Firm. By order of the Judge, no additional information may be disclosed.

March 5, 2019 Cause No. 2018-PR01448-1 In the Estate of Manuel M. Vallejo. Tarrant County Probate Court #1 Judge Chris Ponder. Attorney for plaintiff, Will Pruitt, Law Office of Will Pruitt. Opposing attorney Jason Amon, Law Office of Jason Amon.

November 15, 2018 Case No. 004-01142-2018 Drew Burgess v. Collin County VSF, Inc., Safari Towing & Recovery, and Asa Watkins, in the County Court-at-Law # 4, of Collin County, Texas. Judge David Ripple. Opposing attorney Bradley Voyles, Law Office of Bradley Voyles. Brian Walters of The Walters Firm PLLC for the defense.

February 1, 2018 Cause No: DC-15-0a728 Jose Baez vs. Khraish Khraish, et al. 95th District Court of Dallas County, Texas. Judge Ken Molberg. Opposing attorney Michael Hindman, Loncar and Associates for plaintiff. John Carney and Charles McGarry attorneys for Kraish Kraish of HMK Ltd.

January 18, 2018 Transport Workers Union Local 556 Article XX trial. Allyson Parker-Lauck for the Southwest Airlines Union Board, Chris Clark representing Jeanna Jackson.

DEPOSITIONS IN LAST 4 YEARS

March 28, 2022 Case No. 20-11986 Chapter 11 SBRA Adv. Proc. No. 21-1002 United States Bankruptcy Court for the Eastern District Louisiana. Dennis Perry Debtor, Perry Associates, LLC; Crescent City Property Redevelopment Association, LLC; Crescent City Medical Services, Inc.; Private Connection Auto, LLC; 4330 State Street Drive, LLC; 1100 South Jefferson Davis Parkway, LLC and William Alden individually Plaintiffs v. Dennis A. Perry; Deals on Wheels, LLC Defendants. For the Alden Group, Richard Rozanski Inc. Aplc. Opposing attorney Robin DeLeo LLC for Dennis Perry.

February 16, 2022 Cause No. 479,995 In the Probate Court No. 3 of Harris County, Texas. Estate of Natalia Velasquez. Judge Jason Cox. Deborah Newman of the Newman Law Firm for Velma Buzo. Opposing attorney Jason Klein of Kearney, McWilliams & Davis.

December 1, 2021 Cause No. 2021-PR02832 Estate of James C. Williams Jr., Deceased. In the Probate Court NO. 1, Tarrant County, Texas. Attorney Rudy Beuttenmuller of Thomas, Cinclair & Beuttenmuller PLLC.

June 23, 2021 Cause No. 219-04535-2019. Lance McGregor Ketko v. Sharon Clemm Ketko in the 219th Judicial District Court, Collin County, Texas. Jeffrey Sandberg attorney of Palmer Lehman Sandberg PLLC for plaintiff. Opposing attorney Stephen A. Khoury and Ryan T. Seay of Kelsoe, Khoury, Rogers & Clark, PC. for the defense.

December 10, 2020 Cause No. DC-19-16287 Wildwood Natural Corp. and Chan Cho Parkvs. Shinchon market and Gi B. Na in the 68th Judicial District Dallas County, Texas. Papool Chaudhari with Sul Lee Law for the plaintiffs. Opposing attorney Daniel W. Rowland with Tailim Song Law Firm for the defense.

February 10, 2020 Case No. D-101-CV-2017-01732 State of New Mexico, Santa Fe County First Judicial District Court. Perry Price, Rodery Price and Amy Price, individually and as Trustees for The Tal Eugene "Gene" Price, Jr. and Mary Louise Price Irrevocable Trust and as Personal Representatives and/or Beneficiaries of the Estate of Mary Price Plaintiffs v. Farmer New World Life Insurance Company, Craig Duran Insurance Agency, LLC and Craig Duran Defendants. Attorneys B.J. Crow of the Crow Law Firm and Jeramy I. Schmehl of Ray Pena McChristian, PC.

January 24, 2019 Cause No. PR-17-03496-1 In the Estate of Otila Vieyra In the Probate Court No. 1 and for Dallas County, Texas. Attorney Neil Stockbridge of Hartline Dacus Barger Dreyer LLP for Claimant. Opposing attorney Ms. Ugalahi Offoboche of U.A.C. Offoboche Law Firm for the heirs.

September 28, 2018 Cause No. 31818-F: In the Estate of Dennis Wayne McKee, Deceased in the County Court at Law No. 2 Wichita County, Texas. Attorney's Dean C. Godfrey and C. Dan Campbell of C. Dan Campbell P.C. for contestant Jason McKee. No opposing attorney.

July 9, 2018 Cause No: 2012-43652 ITIO: Kennedy Rose Rooney, Minor Child. In the 308th Judicial District Court, Harris County, Texas. Taken by Bobby K. Newman of Lilly, Newman & Van Ness, LLP. Opposing attorney Mr. John LaGrappe Attorney at Law.

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

*Lies, lies and
more lies!*

*TRO denied
in full*

CAUSE NO. [REDACTED]

IN THE INTEREST OF

[REDACTED] PURCELL

A CHILD

**§ IN THE DISTRICT COURT
§
§ 211TH JUDICIAL DISTRICT
§
§ DENTON COUNTY, TEXAS**

**AMENDED APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND INJUNCTION**

COMES NOW [REDACTED] and pursuant to Texas Family Code Section 105.001 files this Amended Application for Temporary Restraining Order, and in support thereof, respectfully shows:

The present orders relating to possession of and access to the child have become unworkable and are no longer in the best interest of the child.

[REDACTED] would show that Respondent, [REDACTED] Purcell, has engaged in conduct stated in the affidavit attached hereto as Exhibit A. [REDACTED] would further show in support, the supporting affidavit of Jennifer Frenkle, attached hereto as Exhibit B.

[REDACTED] requests the Court immediately issue a Temporary Restraining Order because the present circumstances would significantly impair the child's physical health or emotional development. Based on her affidavit, [REDACTED]

[REDACTED] requests the Court grant the following relief:

1. Issue an order that Respondent, Thomas Purcell's, possession and access to the child be suspended; Evil

2. Issue an order prohibiting Respondent from communicating with [REDACTED] by any means other than OurFamilyWizard; OFW = way overpriced cluster!

3. Issue an order prohibiting Respondent from communicating with the child's school. *see reviews

The requested relief is in the best interest of the child.

The Court should make all other and further orders respecting the child and the parties that are pleaded for or that are deemed necessary and equitable.

[REDACTED] requests that the Court grant the requested temporary restraining Order, that the Order be made effective immediately, and continue in force and effect until further order of the Court or until it expires by operation of law.

[REDACTED] requests that the Court order the parties to appear for hearing in this cause, and that after notice and hearing the temporary restraining order be made a temporary injunction.

[REDACTED] prays that the Court immediately grant a temporary restraining order restraining Respondent, in conformity with the allegations of this petition, from the acts set forth above, and [REDACTED] prays that, after notice and hearing, this temporary restraining order be made a temporary injunction.

[REDACTED] prays that the Court grant this Motion and for all other relief

at law or in equity to which [REDACTED] may be justly be entitled.

Respectfully submitted,

CoffeyHaynes, P.C.
2800 Shoreline Drive, Suite 280
Denton, TX 76210
Tel: 940.591.6473
Fax: 940.591.6483

By: *Amanda M. Coffey*
Amanda M. Coffey
State Bar No. 24072041
amanda@coffeyhaynes.com
Attorney for Michelle Eiland

Certificate of Conference

I certify that a reasonable effort has been made to resolve the dispute without the necessity of court intervention and has failed.

Amanda M. Coffey
Amanda M. Coffey
→ soulless

Certificate of Service

I certify that a true copy of this Application for Temporary Restraining Order and Injunction was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on January 28, 2022:

Patrick Wright
Attorney for [REDACTED] Purcell
Via electronic filing manager

Amanda M. Coffey
Amanda M. Coffey

EXHIBIT A

STATE OF TEXAS)
)
COUNTY OF DENTON)

AFFIDAVIT OF [REDACTED]

BEFORE ME, the undersigned authority, on this date personally appeared, [REDACTED] and, after first being duly sworn, stated under oath:

"I, [REDACTED], am over the age of eighteen years and I am fully competent to make this affidavit. The facts and circumstances alleged are true to the best of my knowledge and belief.

"On January 27, 2022, I reviewed the recommendations of the child custody evaluation with my attorney. I believe my child is in danger in [REDACTED]'s possession based on my personal knowledge and based on the recommendations of the child custody evaluation and because of [REDACTED]'s past behaviors of retaliation. I believe [REDACTED]'s possession should be suspended until further order of the Court and supervised only following a hearing. I am asking for the Court's help. I am asking the Court to consider the recommendations of the child custody evaluation provided to the court on January 21, 2022 and the psychological evaluation of Tom Purcell previously submitted to the Court. I feel that allowing [REDACTED] to be with [REDACTED] alone at this time is destructive and will cause significant emotional harm to his well-being, and this, of course, would not be in his best interest."

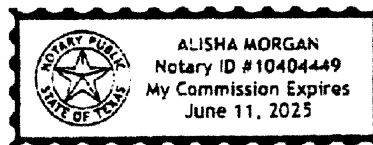
lies just as automatically as she breathes. No exaggeration!

Further Affiant sayeth not.

[REDACTED]

Subscribed and sworn to before me
This 27th day of January 2022.

Alisha Morgan
Notary Public, State of Texas



*Yet more pure
detamation*

EXHIBIT B

STATE OF TEXAS)
)
COUNTY OF DENTON)

Every bit as corrupt and evil as Putin.
1-15 = couldn't be more obvious pure fraud

AFFIDAVIT OF JENNIFER FRENDE

Literally morally bankrupt

BEFORE ME, the undersigned authority, on this date personally appeared, Jennifer Frendle and, after first being duly sworn, stated under oath:

"I, Jennifer Frendle, am over the age of eighteen years and I am fully competent to make this affidavit. The facts and circumstances alleged are true to the best of my knowledge and belief.

"I was appointed by the 211th District Court to conduct a child custody evaluation in the interest of Ryan Purcell and that evaluation was completed on January 21, 2022. Below are my recommendations:

1. The mother have sole managing conservatorship of Ryan. Historically, the parents have had severe conflict over decision-making regarding routine parenting decisions.
2. The mother have the exclusive right to determine Ryan's primary residence, with a geographic restriction to Denton and contiguous counties. She have the sole choice to choose the child's school, dentist, doctors and counselors after informing the father.
3. The father have only supervised access with [redacted] at a licensed supervised visitation agency such as those offered by Forensic Counseling Services or Child Focus Supervised Visitation Center. His access be continuously supervised to protect Ryan and occur once weekly dependent on agency availability. There be no phone calls or other contact.
4. The mother cover the child's health insurance with reimbursement by the father.
5. The father pay child support at the guideline amount.
6. The father attend individual counseling with a licensed psychologist, master's level counselor or social worker. The professional receive a copy of this report from the Court or attorney, not to be shared with the father. The individual counseling assist the father with insight regarding his issues of problems with social rules, fear/paranoia/anger, high conflict and

The one who needs major psychological intervention is raging ASPD Frendle!

protect my son from what? I've never even been accused of hurting him!

parenting. Cognitive behavioral therapy may be the best fit for the father's issues.

7. The father share with his individual counselor the psychological evaluation completed by Mark Foster, Ph.D., MSCP.
8. The father continue to see his current primary care doctor and take medications as prescribed.
9. The mother (and stepfather) complete a substance abuse evaluation and follow any recommendations by the professional, including those involving nicotine cessation. The evaluation be completed by a licensed substance abuse professional familiar with court processes and local substance abuse services. The mother does not appear to have exposed Ryan to cigarette usage in her home.
10. The mother continue to take medications as prescribed and see her primary care doctor as needed. There do not appear to be any indicators that the mother has any serious medical conditions that would adversely impact her parenting or driving.
11. Ryan begin individual counseling to deal with the stress of the custody situation. The counselor be a licensed psychologist, master's level counselor or social worker familiar with high conflict custody cases.
12. The parents communicate only through Our Family Wizard. The child not have access to this communication. There be no name calling, threats or harassment by either parent to the other. Neither parent will email, fax, text or call the other parent at any time. Neither parent will go to the other parent's residence for any reason.
13. There be an order preventing contact by either parent (or anyone on their behalf) with either parent's/stepparent's workplace, family members, friends or neighbors for the purpose of eliciting information to be used in Court, airing grievances, or other harassment.
14. Both parents' communication with the child's school be for the purpose of parent-teacher conferences, getting homework/schoolwork assignments or letting the school know pertinent information about the child (such as absence reasons, missed assignments, etc. The child's school environment needs to be a place of focus and education, not conflict between the parents.
15. It is requested that the Court make very specific orders with specific consequences for violating the orders, so that both parents have a clear understanding of the Court's wishes. It is recommended that the father and mother be required to seek alternative dispute services prior to bringing another child custody modification case."

Forgery committed by Amanda Coffey, Jennifer Frenkle, and Alisha Morgan. Blatant forgery the idiots somehow didn't realize could

Further Affiant sayeth not.

literally produce nothing but bad results for them!

Not legally

signed - was not in front of

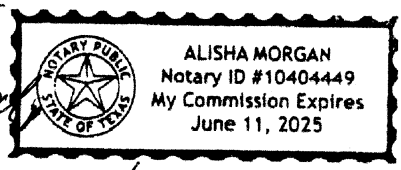
Subscribed and sworn to before me of This 28th day of January 2022.

Jennifer Frenkle
Jennifer Frenkle

Alisha Morgan

Notary Public, State of Texas

notary when signed was many miles away



Amanda Coffey is so very stupid! How in the hell did she think very by the book and otherwise honorable Judge Brody Shanklin would buy this fraud as "good enough" to take a young child from his good dad?

Forged - Frenkle obviously did not drive spur of the moment from either Dallas or Carrollton to sign this affidavit in person in time for an ^(in Denton) hearing ^(meeting) to still be in session! Soulless Amanda Coffey on laptop received this forgery over halfway through a less than 30-minute conference w/ judge! Judge in effect said its hearsay crap and anyway does not even list any endangerment of the child! Because I don't endanger my child, ever!