

## STATE COMMISSION ON JUDICIAL CONDUCT

PO Box 12265

Austin, TX 78711-2265

[www.scjc.texas.gov](http://www.scjc.texas.gov) Tel. (512) 463-5533 · Toll Free: (877) 228-5750

For SCJC use only

## SWORN COMPLAINT FORM

- If you are filing a complaint about more than one judge, please use a **separate form** for each judge.
- Complaints are not accepted against courts – you must specifically name the judge against whom you are complaining.
- Complaints must be mailed. Send the completed form and any additional pages or supporting information to the SCJC.

Complaints will NOT be accepted by email, fax, or online.

Note: Please be sure to fill out each section completely. Do not leave any section blank. If you do not know the answer, write "I don't know." If the question is not applicable, write "Not Applicable" or "NA." **Deficient complaints will be returned.**

Section 1	<b>Identity of Complainant</b> Your Name: <u>Torn Purcell</u> Mailing Address: <u>1313 Valley Dr</u> City, State Zip: <u>Justin, TX 76247</u>		Date of Birth: <u>05/12/1969</u> Your Phones: Day <u>(817) 999-9226</u> Email Address: <u>purcelltb@verizon.net</u>
Section 2	<b>Identity of Respondent Judge</b> Judge: <u>Crystal Levonius</u> Court Number: <u>481st</u> City and County: <u>Denton</u>		
Section 3	<b>Identity of Attorney(s) Involved</b> Were / are you pro se (represent yourself)? <input type="checkbox"/> represented by counsel? <input checked="" type="checkbox"/> Comment: <u>I was pro se some of the time. Opposing counsel now claims she no longer represents my ex for this case because it "is over."</u>		
Section 4	<b>Your Attorney:</b> <u>Betsy Parmer</u> Address: <u>4215 Camp Bowie Blvd</u> City/Zip: <u>Ft Worth, TX 76107</u> Phone Number: <u>(817) 308-6755</u> Email Address: <u>betsyparmer_80@hotmail.com</u>		
Section 5	<b>Opposing Attorney:</b> <u>Lene DeRudder</u> Address: <u>4964 Preston Park Blvd, Ste 320</u> City/Zip: <u>Plano, TX 75093</u> Phone Number: <u>(214) 227-7413</u> Email Address: <u>laderudder@cowlesthompson.com</u>		
	<b>Previous Attorney(s)</b> Name(s) and Contact Information: <u>My former attorneys: Rick Mitchell, Jeff Stewart, Paula Bennet, Patrick Wright. Opponent's former attorney: Amanda Coffey.</u>		
	<b>Nature of Complaint</b> If your complaint involves a court case (i.e., criminal, small claims, civil, family law, traffic, probate, etc.), answer the following questions: 1. Name of court: <u>481st Court</u> 2. Case Number: <u>15-10574-211</u> 3. Title of suit (for example, State v. Jones or Jones v. Jones): <u>In the interests of R.B.P., a child.</u> 4. If you are not a party to this suit, what is your connection with it? Explain briefly. <u></u>		
	<b>Identity of Witnesses</b> Name(s) and Contact Information <u>Mackenzie Brasher, 469-269-2008</u> <u>Ellen Hutton, 214-763-7424</u> <u>Patrick Wright, 214-763-8343</u>	What did they witness? (Focus on the judge's conduct, not rulings.) <i>You may continue on separate sheets of paper if not enough room.</i> <u>Forced by Judge Levonius to present her therapy notes and provide testimony POST-JURY verdict.</u> <u>Court-appointed counselor for my son - listened to the evidence of opposing party committing MSBP.</u> <u>Former attorney of mine; witnessed the issuance of the blatantly illegal counseling order.</u>	

**Details of Complaint**

Please Tell the Commission what the judge did that you believe to be misconduct. Please focus on the **judge's conduct**, and **not the judge's rulings**. (Rarely is a judge's ruling subject to discipline by the Commission.) If more space is needed, attach additional sheets, but please limit your complaint to no more than 20 pages. Your complaint should be as specific as possible.

**Date(s) of Alleged Misconduct of Judge:** 8/31/2022 thru present

**Factual Details of your complaint against the Judge:**

*You may continue on separate sheets of paper if not enough room.*

~~My detailed complaint is enclosed (7 1/2 pages).~~

~~Thank you. Tom Purcell~~

A revision of my original complaint consisting of ten pages is enclosed as well as three additional pages of documentation. *TP*

Section 6

Judge: Crystal Levonius

Your name: Tom Purcell

**Factual Details of your complaint against the Judge (continued):**

Please see enclosed. *JP*

Section 6 (continued)



Judge: Crystal Levenius

Your name: Tom Purcell

Section 7	<p><b>Confidentiality</b></p> <p><i>* I understand that as part of the Commission's investigation the judge may be provided a copy of this complaint. *</i></p> <p>Please note - the Commission will do its best to maintain your confidentiality, however, it may not be possible for the Commission to pursue an investigation if you request that your identity be kept confidential from the judge. Even if we do not contact the judge during the course of our investigation, there is a risk that one or more of the witnesses contacted by our agency will disclose the investigation and your identity to the judge.</p> <p>I request that my identity be kept confidential. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
Section 8	<p><b>Additional Instructions</b></p> <p><b><u>Affidavit</u></b></p> <p>The State Commission on Judicial Conduct requires that complainants file a sworn complaint. The affidavits are attached.</p> <p><b>Two types of affidavits (choose one):</b></p> <ol style="list-style-type: none"> <li>1. <b>Affidavit Based on Personal Knowledge</b> - (Complete this affidavit if the misconduct alleged is within your direct personal knowledge.)</li> <li>2. <b>Affidavit Based on Information and Belief</b> - (Complete this affidavit if the misconduct alleged is not within your direct personal knowledge but is based on reasonable belief.) This can include misconduct that you did not directly witness.</li> </ol> <p><b>*** Failure to complete and submit an affidavit will cause your complaint to be noncompliant and returned. ***</b></p> <p><b>Submission of supporting documents:</b></p> <ul style="list-style-type: none"> <li>• In order for the Commission to comply with the statutory deadlines, additional information/documentation that you would like to include as part of your complaint submission should be received in this office within thirty (30) days after submission of your complaint. Please limit your additional information and/or evidence to twenty-five (25) pages.</li> <li>• Please note that submission of documents/evidence in support of the underlying matter in litigation, (e.g., employment records, medical records, etc.) is seldom helpful and is discouraged. (In fact, submission of irrelevant material can actually slow down the investigation of your complaint.)</li> <li>• Instead of submitting voluminous information, it is recommended that you detail, in your complaint, the information you possess that is available upon request.</li> <li>• If you wish to supplement your complaint, please reference the material with your CJC number (that will be provided to you) so that it is routed to the accurate file.</li> <li>• Please focus your complaint on supporting information on the judge's conduct instead of the judge's rulings.</li> </ul> <p><b><i>If you are submitting documents, please provide copies, not originals. Originals will not be returned.</i></b></p> <p><b><u>Anonymous Submissions:</u></b></p> <p>Anonymous submissions will be presented to the Commission which has the discretion to initiate a complaint based on the anonymous report.</p>



**Affidavit Based on Personal Knowledge** - (Complete this affidavit if the misconduct alleged is within your direct personal knowledge.)

Please completely fill out this form.

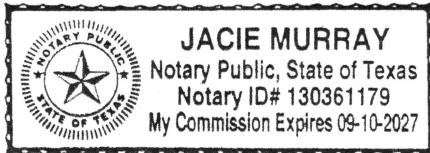
\*\*\* Failure to complete this form properly will cause your complaint to be noncompliant and returned. \*\*\*

I, Tom Purcell, Complainant, swear that I have knowledge of the facts alleged in this complaint. I declare that the foregoing is true and correct and that the information contained in this complaint is true and correct.

Tom Purcell  
Signature of Complainant (Declarant)

Please complete **EITHER** the notary section **OR** the Unsworn Declaration section.

### NOTARY SECTION



AFFIX NOTARY STAMP/SEAL ABOVE

Sworn to and subscribed before me, by the said driver's license, this the \_\_\_\_\_ day of 20 June, 20 25, to certify which, witness my hand and seal of office.

Jacie Murray  
Signature of officer administering oath

Jacie Murray  
Printed name of officer administering oath

Lending Assistant  
Title of officer administering oath

OR

### UNSWORN DECLARATION SECTION

My name is Tom Purcell TP and my date of birth is 05/12/1969 TP

My address is \_\_\_\_\_  
(STREET) (CITY) (STATE) (ZIP) (COUNTRY)

Executed in \_\_\_\_\_ County, State of \_\_\_\_\_, on the \_\_\_\_\_

of \_\_\_\_\_, of 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of Complainant (Declarant)

\*page 6 of 6 is an exact copy of this page. TP

Additional documents for  
CJC Case No. 25-0980. JP

June 20, 2025

→ \*\*\*Revision of Texas State Commission on Judicial Conduct complaint filed by Tom Purcell against Denton County judge Crystal Levonius – originally mailed June 9, 2025, USPS certified mail #7016 0910 0000 0696 2492 to P.O. Box 12265, Austin, TX 78711.

Despite a plethora of evidence undeniably proving an extremely high level of perpetual judicial misconduct, several people have told me it was a complete waste of my time to write and file this complaint. But I felt compelled to do it anyway. Though I plenty fear the SCJC is what others tell me they “know” it to be: a good ol’ boy network who always “finds” judges to be innocent of any and all wrongdoing no matter how much rock solid evidence to the contrary there might be. Nevertheless, I still hold out hope that at this point in time the majority of the SCJC happens to consist of morally sound people who care about doing their very important jobs by the book and aren’t afraid to do so. “*The only thing necessary for evil to prosper is for good men (and women) to do nothing.*” I actually highly dislike the preceding quote – because for instance any official sworn to putting forth a good faith effort towards holding accountable overwhelmingly proven to be highly corrupt judges choosing to instead sweep such known to be child-destroying judicial depravity under the rug is inherently not a good person.

*\*I very much apologize for the original filing of my complaint having a number of misstatements in section number ‘1.’ I didn’t have a copy of the completed jury charge at the time I originally filed the complaint and I believe my attorney in May 2024 showed me a draft of the charge, not the final version. Nevertheless, the wording of the final jury charge Judge Levonius chose for the jury to receive and her outrageous actions relating to the charge still irrefutably constitute a shocking level of judicial misconduct.*

→ 1) Illegally misleading the jury by stating in the jury’s charge that they did not have to designate one of the parents to have the exclusive right to choose the child’s primary residence (was “ok” for them to not designate a primary).

One of the most glaring pieces of evidence of Judge Levonius's misconduct is her wording of the jury charge and her actions relating to the jury charge, such as she illegally hiding from the jury that upon their voting for joint managing conservatorship it was their responsibility under state law, 105.002(c)(1)(D) (law quoted below), not option under state law, to unilaterally decide which parent will designate the child’s primary residence. Instead, as you can see by the

→ attached jury charge excerpts (questions ‘2’ and ‘3’), Judge Levonius gave the jury the option to declare neither parent has the right to designate the primary residence of the child. Hiding from the jury their legal responsibility to determine which parent has the right to designate the child’s primary residence “allowed” Judge Levonius (in her mind allowed) to egregiously violate 105.002(c)(1)(D) by she being the one choosing which parent’s home is the primary residence, and she chose the mother. Yes, in one part of the final orders Judge Levonius falsely claims to have abided by the jury’s decision to not designate a primary. **But her orders undeniably designate the mother’s house to be the child’s primary residence because those orders entail:** A) awarding the mother an average of 25 days of possession for nine months of the year, B) **Judge Levonius listing Wise Co. as the child’s only county of residence.** Denton County not also being listed by Levonius as a residence of my son is obviously not an oversight: A) the entirety of the case was tried in Denton County, B) the child’s mother is the only one of us who

\* Almost half of these ten pages only entail the quoting of relevant statutes. JP

1 of 10



lives in Wise County, C) I have lived in Denton County the entirety of this case plus another ten years (modification filed June 2019) and have never lived in Wise County.

Sec. 105.002. JURY. (a) Except as provided by Subsection (b), a party may demand a jury trial. (c) **In a jury trial:**

**(1) a party is entitled to a verdict by the jury and the court may not contravene a jury verdict on the issues of:**

(A) the appointment of a sole managing conservator;

(B) the appointment of joint managing conservators;

(C) the appointment of a possessory conservator;

**(D) the determination of which joint managing conservator has the exclusive right to designate the primary residence of the child;**

(E) the determination of whether to impose a restriction on the geographic area in which a sole managing conservator or joint managing conservator may designate the child's primary residence;

The jury voted for the child's mother and me to be **joint managing conservators** yet Judge Levonius's final orders entail she forbidding me from having any say at all concerning my son's medical and educational decisions – not even allowed to discuss such decisions with the child's mother. I'm also forbidden to consult with any physician or dentist about my child's health in any way or even allowed to obtain my child's health records. Judge Levonius's level of judicial misconduct is so extreme and her concern for my child's physical and mental well-being so low (non-existent) that she gave the mother the right to not list me as an emergency contact in the event our son is hurt or injured at school or elsewhere. My son is devastated by the new possession order. And what child who very much loves his or her father and had spent over 50% of the time with him for the first 11 years of life wouldn't be devastated by such an order? During those 11 years, I had across the board equal parental rights.

I won the jury trial as the jury chose joint managing conservatorship (equal parental rights), not the mother be sole managing conservator. And **there is no reason to believe that the jury's disgust with the mother over she and her attorney claiming our son would be "better off" barely ever seeing me anymore (i.e. asking the jury to vote for the mother to be sole managing conservator) would have very likely prompted them to designate me as the parent who has the right to choose our son's primary residence** – if Judge Levonius had not illegally instructed the jury that it's "just fine" for them to declare neither parent has the right to declare the child's primary residence.



→ **2) Illegal (in many obvious ways) order for me to indefinitely attend counseling.**

Another glaring example of Judge Levonius flagrantly, pompously, and in the end catastrophically violating my basic rights under a no room for misinterpretation state law occurred on August 31, 2022 (and continues to this day) when she **ordered me to attend counseling indefinitely**. This order was mainly if not solely because I had “dared” to send the child’s mother a picture in which my son had feigned (obviously feigned) a bicycle accident. While I was on the witness stand, Judge Levonius stated the following to me, quote “*I think you did it [sent obviously staged bike accident scene] to scare the bejesus out of the mother!*” Did Levonius miss the part about the mother undeniably knowing the bike scene was a joke as she did not call me to “make sure” our son was OK? **We are now at 34 months and counting since the counseling order was issued.** For two years I had to go to counseling weekly and about ten months ago Judge Levonius “so kindly” reduced the frequency down to every other week. **As the two below-stated statutes confirm, Judge Levonius clear as day had no right to order me to attend counseling at all, not even temporarily.** Example: no expert witness – or non-expert – opined I need to attend counseling. Even if she did have the right to order counseling (which she clearly did not), such an order is illegal to impose beyond 12 months. In Judge Levonius’s highly depraved and deluded mind, any and all statutes and binding precedent are literally “OK” for her to blatantly violate anytime she “knows” her own “laws” (i.e. mega-bizarre personal beliefs, outrageous patently false assumptions, outrageous biases, and aiding and abetting her fellow good ol’ boy network members) constitute a “much better route” in deciding the fate of a litigant and his or her child(ren).

**\*\*\*Topics 3 thru 7 are stated below the counseling statutes.**

Sec. 574.0355. ORDER FOR EXTENDED OUTPATIENT MENTAL HEALTH SERVICES. (a) The judge may order a proposed patient to receive court-ordered extended outpatient mental health services only if:

(1) the judge finds that appropriate mental health services are available to the proposed patient; and **jury did not find this**

(2) the judge or jury finds, from clear and convincing evidence, that:

(A) the proposed patient is a person with severe and persistent mental illness; **No one, Judge Levonius other otherwise, has ever accused me of meeting this description.**

(B) as a result of the mental illness, the proposed patient will, if not treated, experience deterioration of the ability to function independently to the extent that the proposed patient will be unable to live safely in the community without court-ordered outpatient mental health services; **No one,**

Judge Levonius other otherwise, has ever accused me of meeting this description.

(C) outpatient mental health services are needed to prevent a relapse that would likely result in serious harm to the proposed patient or others; No one, Judge Levonius other otherwise, has ever accused me of meeting this description.

(D) the proposed patient has an inability to participate in outpatient treatment services effectively and voluntarily, demonstrated by: N/A

(i) any of the proposed patient's actions occurring within the two-year period that immediately precedes the hearing; or N/A

(ii) specific characteristics of the proposed patient's clinical condition that significantly impair the proposed patient's ability to make a rational and informed decision whether to submit to voluntary outpatient treatment;

No one, Judge Levonius other otherwise, has ever accused me of meeting this description.

(E) the proposed patient's condition is expected to continue for more than 90 days; N/A and

(F) the proposed patient has received:

(i) court-ordered inpatient mental health services under this subtitle or under Subchapter D or E, Chapter 46B, Code of Criminal Procedure, for a total of at least 60 days during the preceding 12 months; or N/A

(ii) court-ordered outpatient mental health services under this subtitle or under Subchapter D or E, Chapter 46B, Code of Criminal Procedure, during the preceding 60 days.  
N/A

(b) The jury or judge is not required to make the finding under Subsection (a)(2)(F) if the proposed patient has already been subject to an order for extended mental health services.

N/A

(c) To be clear and convincing under Subsection (a)(2), the evidence must include expert testimony and evidence of a recent overt act or a continuing pattern of behavior that tends

to confirm: There was no such expert testimony. To be clear, no expert of any kind opined on whether I need counseling.

(1) the deterioration of the ability to function independently to the extent that the proposed patient will be unable to live safely in the community; N/A

(2) the need for outpatient mental health services to prevent a relapse that would likely result in serious harm to the proposed patient or others; N/A and

(3) the proposed patient's inability to participate in outpatient treatment services effectively and voluntarily.

N/A

(d) An order for extended outpatient mental health services must provide for a period of treatment not to exceed 12 months. We are at 33 months and counting.

(e) A judge may not issue an order for extended outpatient mental health services for a proposed patient who is charged with a criminal offense that involves an act, attempt, or threat of serious bodily injury to another person. N/A

Added by Acts 2019, 86th Leg., R.S., Ch. 582 (S.B. 362), Sec. 15, eff. September 1, 2019.

Sec. 574.0345. ORDER FOR TEMPORARY OUTPATIENT MENTAL HEALTH SERVICES. (a) The judge may order a proposed patient to receive court-ordered temporary outpatient mental health services only if:

(1) the judge finds that appropriate mental health services are available to the proposed patient; and

(2) the judge or jury finds, from clear and convincing evidence, that:

(A) the proposed patient is a person with severe and persistent mental illness; No one, judge or otherwise, accused me of anything remotely close to this label.



(B) as a result of the mental illness, the proposed patient will, if not treated, experience deterioration of the ability to function independently to the extent that the proposed patient will be unable to live safely in the community without court-ordered outpatient mental health services; No one, judge or otherwise, accused me of anything remotely close to this label.

(C) outpatient mental health services are needed to prevent a relapse that would likely result in serious harm to the proposed patient or others; N/A and

(D) the proposed patient has an inability to participate in outpatient treatment services effectively and voluntarily, demonstrated by:

(i) any of the proposed patient's actions occurring within the two-year period that immediately precedes the hearing; or

(ii) specific characteristics of the proposed patient's clinical condition that significantly impair the proposed patient's ability to make a rational and informed decision whether to submit to voluntary outpatient treatment.

N/A

(b) To be clear and convincing under Subsection (a)(2), the evidence must include expert testimony and evidence of a recent overt act or a continuing pattern of behavior that tends to confirm:

(1) the deterioration of ability to function independently to the extent that the proposed patient will be unable to live safely in the community; No one, judge or otherwise, accused me of anything remotely close to this label.

(2) the need for outpatient mental health services to prevent a relapse that would likely result in serious harm to the proposed patient or others; N/A and

(3) the proposed patient's inability to participate in outpatient treatment services effectively and voluntarily.

N/A

(c) An order for temporary outpatient mental health services shall state that treatment is authorized for not longer than 45 days, except that the order may specify a period not to exceed 90 days if the judge finds that the longer period is necessary. In Judge Levonius's court, the above might as well state "45 years" and "90 years."

(d) A judge may not issue an order for temporary outpatient mental health services for a proposed patient who is charged with a criminal offense that involves an act, attempt, or threat of serious bodily injury to another person. N/A

Added by Acts 2019, 86th Leg., R.S., Ch. 582 (S.B. 362), Sec. 12, eff. September 1, 2019.

➔ **3) *Illegal order for controversial evidence, testimony and documents, to be provided to the court post-jury trial.***

Another law Judge Levonius irrefutably, egregiously, and arrogantly violated is TX. R. Civ P.270: "A court may permit additional evidence at any time if it clearly appears to be necessary to the due administration of justice, although evidence on a matter that is controversial may not be presented after a jury verdict."

Judge Levonius unlawfully ordering the submission of undeniably controversial evidence (in fact a huge volume, a 5" stack of therapy records and the counselor's testimony) subsequent to the jury's verdict is in gross violation of Tex R. Civ P. 270 (see wording of ...270 above). Allowing evidence concerning a controversial matter post-jury verdict (over a month post-verdict) doesn't get more obvious than when Judge Levonius three weeks after the jury's verdict suddenly ordered my therapist to turn over all her notes (all my private thoughts, beliefs, and hardships) when she (the judge) had for almost two years ruled that my time with the counselor – counseling Levonius herself illegally ordered - would all be confidential. To be clear, Judge Levonius issued the counseling order on August 31, 2022, and within it stated my HIPAA rights specific to the therapy she herself illegally ordered would be honored. Then 22 months later – when biased to the extreme Levonius was mad as hell over the jury voting for me - she changed her order from my HIPAA rights being respected in full to my HIPAA rights being null and void retroactive to all 22 months. Despicable.

Could evidence get any more controversial than evidence that was: A) submitted post-jury trial, B) only came into existence (counseling notes and counselor knowledge/testimony) because of a judge's illegal order for the litigant to attend counseling?



**4) "COVERT" RETALIATION – Assessing me with over \$155,000 in legal fees.**

Judge Levonius using unlawful means (ordering controversial evidence be entered long after the ending of a jury trial) to learn what I said about her during the counseling sessions she illegally ordered almost surely played a huge role, if not was the only factor, in Levonius's levels of outrageous, obviously criminal-level misconduct becoming absolutely extreme. So extreme she created the unthinkable, undeniably preposterous order for me to pay \$155,466 in legal fees (in addition to monthly child support) despite that: **A)** I won the jury trial (i.e. 10 of 12 of my peers, including a retired pediatrician, found my case to be legitimate and thus ruled for the child's mother and me to be joint managing conservators instead of the mother be deemed sole conservator), **B)** the mother is who filed this now six-year nightmare suit and I all along made clear I didn't want this litigation, **C)** the child's mother is who chose the much more expensive jury trial option instead of bench, **D)** I respected the Court's very standard order for mediation while despite much prompting by my then attorney the mother and her attorney refused to even consider abiding by the order to attend mediation. True to form, Judge Levonius had no problem with the mother and her attorney, Lene DeRudder (who "just happens" to have a long history of being involved in the same Collin County political circles as Judge Levonius), pompously refusing to abide by the order to attend mediation. Levonius just threw out the order.

**5) Judge Levonius pretending a section of the completed jury charge warranted her assessing me with legal fees (an enormous amount of fees).**

\*First please refer to A-D in the previous section.

Judge Levonius came up with her preposterous \$155,466 owed for legal fees by inexplicably having the jury charge include their stating how much they believe each attorney had earned and then she (the judge) deducting the vastly understated amount my attorneys reported (\$73,262.50) from the amount the opposing attorneys reported (\$228,728.50). As you can see by the enclosed jury charge excerpts, the jury was tasked (is it legal to assign them such a task?) with determining "... a reasonable fee for the necessary services of MICHELLE EILAND's attorneys in this lawsuit" and "... a reasonable fee for the necessary services of THOMAS PURCELL's attorneys in this lawsuit."

**A)** Despite Judge Levonius pretending otherwise, the jury charge did not task the jury with deciding or even opining on whether one side should be assessed some or all of the other side's legal fees – and Levonius of course did not tell them the amounts they write down could be used by her to "justify" (in her mind only) assessing me with legal fees. The jury was just given the dollar amounts of what the attorneys reported for their services and then they (the jury) chose to state on the charge the exact amount each attorney reported.

*\*And how in the world would this case's jury or any other jury have any idea if the attorneys involved in the case had truly earned every dollar they billed?*

**B)** My trial attorneys failed to report to the jury the roughly \$160,000 I had paid to other attorneys who represented me in the child custody suit during the almost five years prior to trial.

**C)** During the hearing on a motion for reconsideration, Judge Levonius refused to add any of my previous attorneys' fees to her jury charge "equation"; fees that if Levonius had added would have completely offset the \$155,466 she falsely declared I owed based on her false narrative of the jury charge giving her "just cause" to assess me with legal fees.



*\*I am not a rich person by any means. A second mortgage on my house and help from family members are the only ways I was able to afford such exorbitant, insane fees.*

An attorney recently advised me that legal fees in a custody case cannot be assessed by a judge unless they are quote "Necessary for the safety and welfare of the child." Not even off the chart addicted to perpetually and egregiously committing judicial misconduct Crystal Levonius has made such a claim, and of course no expert witness or anyone else has made such a claim.

→ 6) Judge Levonius having no problem with the custody evaluator being fully complicit in affidavit fraud and violating standing orders by hiding from my attorney her dealings (affidavit fraud, etc) with the opposing party's attorney and paralegal.

Another act of gross judicial misconduct committed by Judge Levonius is when during a hearing she "found" no bias had occurred when the custody evaluator, Jennifer Frendle, illegally submitted part of her report (in violation of the rules of evidence) via an affidavit solely created by the office of the then opposing counsel. She ruled no bias had occurred even though the custody evaluator admitted on the stand that she was at home 25 miles away when she signed the affidavit (i.e. didn't sign in front of the notary, who was also the opposing counsel's paralegal). Judge Levonius outright stated that all the blame for such egregious fraud should be placed on the notary, not one bit of blame on the custody evaluator -- as if it's plausible for a custody evaluator with over 20 years experience to not know: A) it's illegal to submit any part of her report (must go through the rules of evidence first and then one party or the other submit it), B) signing and submitting an affidavit when the signing did not occur in front of the notary is illegal.

*\*I filed a complaint against the notary, Alisha Morgan. The secretary of state's office found her guilty and suspended her license for one month. (At least one of the several habitual criminals I've fought during this nightmare litigation has been dealt a little accountability).*

*\*\*A handwriting expert confirmed (via a report submitted to court) that the affidavit was in fact created by the opposing counsel's office. She confirmed via comparing it to another affidavit created by said office.*

*\*\*\*The judge "finding" no bias had occurred allowed for the "unbiased" custody evaluator to supplement her report.*

→ 7) Judge Levonius having no problem with by definition child abuse being committed by the child's mother.

In March 2023, a scheduled hearing regarding a TRO application filed by my then attorney did not move forward because just before it was to begin Judge Levonius obliged opposing counsel's wish to meet in chambers, where they all three stayed for 50 mins. Judge Levonius then came out and stated nothing would be done. **The preceding constitutes known child endangerment (assuming Levonius actually abided by her duty to read the filing) as my and my attorney's TRO app (which was already provided to the SCJC earlier this month) clearly spelled out that the mother had committed by definition Munchausen syndrome by proxy (caught on tape) as she feigned – and admitted on tape to feigning – that our son suffers from a serious**

**psychological disorder, trichotillomania (frequently pulling out one's own hair). My son has never pulled his hair, much less pulled it out!** The feigning of our son having a major psychological disorder irrefutably meets the definition of **Munchausen syndrome by proxy** as the sick lies were perpetrated in an effort to deceive the custody evaluator as well as the child's then lifelong doctor – deception of the latter being much more obvious because the mother's stated intent to the then tie-breaker doctor was to convince him he must agree with her that our child's "[non-existent] psychological condition is so bad that he has to go to counseling." (And then of course the mother planned to talk the counselor into blaming our son's non-existent condition on "how bad" he has it at my house).

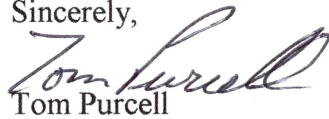
*\*Mayo Clinic's definition for Munchausen syndrome by proxy: "Factitious disorder imposed on another, previously called Munchausen syndrome by proxy, is when someone falsely claims that another person has physical or mental symptoms of illness or causes injury or disease in another person to deceive others... "This form of abuse can put a child in danger of being hurt or getting medical care that isn't needed."*

There are so many other heinous acts of judicial misconduct committed by "I'm above all laws" habitual criminal, highly disturbed Judge Crystal Levonius. But for now that's all I'm going to report.

Again, there is no gray area to the fact Judge Levonius has numerous times during my case committed undeniably illegal acts to feed her addiction to malfeasance at horrendous cost to my son and me. If a majority of the commission's members are at all objective and otherwise of good moral character then major action will be taken against overtly off the chart corrupt Judge Crystal Levonius. For over three years Levonius has been allowed to scot-free issue just as many blatantly illegal orders and otherwise abuse her position just as often and just as egregiously as she wishes at enormous cost to dozens if not hundreds of innocent people, a large percentage being children. It is the commission's duty to protect the public from overwhelmingly proven to be morally bankrupt and highly disturbed judges such as Levonius and serve up significant accountability for their highly destructive criminal acts.

Thank you for your time.

Sincerely,



Tom Purcell

1313 Valley Dr, Justin, TX 76247

817-999-9226

Fax: 469-744-5204

[purcelltb@verizon.net](mailto:purcelltb@verizon.net)



*\* Additional documentation for  
ESC Case No. 25-0980. JF*

1. The circumstances of R.B.P. or of MICHELLE EILAND or of THOMAS PURCELL have materially and substantially changed since April 20, 2016 and
2. The appointment of MICHELLE EILAND or of THOMAS PURCELL to have the exclusive right to designate the primary residence of R.B.P. would be in the best interest of R.B.P.

**QUESTION 2:**

Should either MICHELLE EILAND or THOMAS PURCELL be appointed as the joint managing conservator with the exclusive right to designate the primary residence of R.B.P.?

Answer "Yes" or "No."

Answer: NO

If you answered "Yes" to Question 2, then answer Question 3. Otherwise, do not answer Question 3.

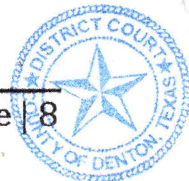
**QUESTION 3:**

As a joint parent conservator, WHO should be permitted to designate the primary residence of R.B.P.? ONLY CHECK ONE, DO NOT CHECK BOTH.

MICHELLE EILAND: \_\_\_\_\_

THOMAS PURCELL: \_\_\_\_\_

Proceed to Questions 4 and 5 and answer.





\* Additional documentation for  
CSC Case No. 25-0980. 7P

**AS TO QUESTIONS #4 and #5:**

A reasonable fee is reasonable hours worked, and to be worked, multiplied by a reasonable hourly rate for that work.

Factors to consider in determining a reasonable fee include -

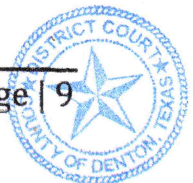
1. The time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal services properly.
2. The likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer.
3. The fee customarily charged in the locality for similar legal services.
4. The amount involved.
5. The time limitations imposed by the client or by the circumstances.
6. The nature and length of the professional relationship with the client.
7. The experience, reputation, and ability of the lawyer or lawyers performing the services.

**QUESTION 4:**

What is a reasonable fee for the necessary services of MICHELLE EILAND's attorneys in this lawsuit?

Answer with an amount in dollars and cents.

Answer: \$ 228,728.50



\* Additional documentation for  
CJC Case No. 25-0980. 7p

**QUESTION 5:**

What is a reasonable fee for the necessary services of THOMAS PURCELL's attorneys in this lawsuit?

Answer with an amount in dollars and cents.

Answer: \$ 73,262.50

