

CAUSE NO. 2024-51192

BELINDA F. PUNTANEN, Individually and §
d/b/a Hastings and Associates, and §
as Next Friend of Z.R.M., a minor §
Plaintiff §

vs. §

JENNIFER AISLINN GRANT, Individually §
and in her official capacity(ies) for §
RESOLVE FOR JUSTICE FOUNDATION, §
and in her official capacity(ies) for §
GRANT HOUSE RESOLVED, LLC, §
HEATHER GENTILE CARTER, §
BELINDA ROCHELLE BLOW-SAENZ, §
NICHOLAS PATNIYOT, §
KELLY P. JOSEPH, §
TRAVIS COLLINS, §
JANE and JOHN DOES 1-10, §
Defendants §

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

11TH JUDICIAL DISTRICT COURT

NOTICE OF PETITION FOR DAMAGES AGAINST
BELINDA F. PUNTANEN, REAL ESTATE SQUATTER AND
OBJECTION TO AFFIDAVIT OF INABILITY TO PAY COURT COSTS

DEFENDANT, JENNIFER AISLINN GRANT (“Ms. Grant”), files this *Notice of Petition for Damages Against Belinda F. Puntanen, Real Estate Squatter and Objection to Affidavit of Inability to Pay Court Costs*.

Ms. Grant has sued PLAINTIFF, BELINDA F. PUNTANEN (herein, “Ms. Puntanen”), both individually and in her capacity as next friend of minor, Z.R.M., for damages in Cause No. 2025-13614, styled *Grant v. Runyon et al* pending before the 151st Judicial District Court of Harris, County, Texas. Attached as **Exhibit A** is a true and correct copy of the (certified mail) citation of the real estate squatter, BELINDA PUNTANEN, with the current live pleading entitled, *First Amended Original Petition for Damages Due to Defendants’ Interference with Plaintiff’s Possessory Interest in Children, Property Damage, Conversion, Harassment, and Invasions of Privacy, Request for Court to Exercise Its Inherent Power to Refer for Criminal Prosecution, Refer for Disciplinary Proceedings, Request for Temporary Restraining Order, Request for Temporary and Permanent Injunctions, and Request for Disclosures*.¹

Ms. Grant objects to the *Affidavit of Inability to Pay Court Costs* filed by Ms. Puntanen on August 9, 2024, and believes it to be false. Ms. Grant will ask the Court to set a show cause hearing regarding her objection based upon Ms. Puntanen’s extensive history involving abuses of process

¹ Ms. Puntanen is currently under criminal investigation and is believed to be sought for questioning by investigators with the Houston Police Department regarding the allegations made in the attached petition.

which have resulted in permanent injunctions against her for unauthorized practice of law in six Texas cases. Ms. Grant has exhaustively reported Ms. Puntanen both to law enforcement and the State Bar of Texas.

Respectfully submitted,



JENNIFER AISLINN GRANT, Defendant
Paralegal SBN: 24104811
Grant House Resolved, LLC
5850 San Felipe St., Suite 500
Houston, Texas 77057
Tel: (713) 333-9372
jennifer@quantumlegalsupport.com

CERTIFICATE OF SERVICE

I certify that a true copy of this *Notice of Petition for Damages Against Belinda F. Puntanen, Real Estate Squatter and Objection to Affidavit of Inability to Pay Court Costs* with **Exhibit A** filed herewith was served in accordance with the Texas Rules of Civil Procedure on March 12, 2025, by Texas E-Filing and E-Service Manager to all parties or counsel of record.



JENNIFER AISLINN GRANT, Defendant
Paralegal SBN: 24104811
Grant House Resolved, LLC
5850 San Felipe St., Suite 500
Houston, Texas 77057
Tel: (713) 333-9372
jennifer@quantumlegalsupport.com

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 98400206

Filing Code Description: Notice

Filing Description: Notice Of Petition for Damages Against Belinda F. Puntanen, Real Estate Squatter and Objection to Affidavit of Inability to Pay Court Costs

Status as of 3/13/2025 9:28 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Belinda Puntanen		larconsultant.belinda@gmail.com	3/12/2025 11:31:34 PM	SENT
Belinda Puntanen		HastingsandAssociateTX@gmail.com	3/12/2025 11:31:34 PM	SENT
Jennifer Grant		AttorneyJonHill@gmail.com	3/12/2025 11:31:34 PM	SENT
Belinda RochelleBlow-Saenz (Dixon)		belinda.quantumlegalassist1@gmail.com	3/12/2025 11:31:34 PM	SENT
Heather GentileCarter		changemystateaz@gmail.com	3/12/2025 11:31:34 PM	SENT
Travis Collins		ticollins03@gmail.com	3/12/2025 11:31:34 PM	SENT
Nicholas Patniyot		npatyinot@hotmail.com	3/12/2025 11:31:34 PM	SENT
Jennifer Grant		AttorneyJonHill@gmail.com	3/12/2025 11:31:34 PM	SENT
Jennifer Grant		AttorneyJonHill@gmail.com	3/12/2025 11:31:34 PM	SENT
Belinda Faith OdellPuntanen		belindapuntanen@gmail.com	3/12/2025 11:31:34 PM	SENT
Zoe RaquelMiller		zoeraquel777@gmail.com	3/12/2025 11:31:34 PM	SENT
Jennifer AGrant		jennifer@quantumlegalsupport.com	3/12/2025 11:31:34 PM	SENT

CAUSE NO. 2024-51192

**BELINDA F. PUNTANEN, Individually and
d/b/a Hastings and Associates, and
as Next Friend of Z.R.M., a minor**
Plaintiff

vs.

**JENNIFER AISLINN GRANT, Individually
and in her official capacity(ies) for
RESOLVE FOR JUSTICE FOUNDATION,
and in her official capacity(ies) for
GRANT HOUSE RESOLVED, LLC,
HEATHER GENTILE CARTER,
BELINDA ROCHELLE BLOW-SAENZ,
NICHOLAS PATNIYOT,
KELLY P. JOSEPH,
TRAVIS COLLINS,
JANE and JOHN DOES 1-10,**
Defendants

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

11TH JUDICIAL DISTRICT COURT

EXHIBIT A

CITATION - BELINDA PUNTANEN

PLAINTIFF: GRANT, JENNIFER A (INDIVIDUALLY AS THE SOLE MANAGING
CONSERVATOR AND
vs.
DEFENDANT: RUNYON, MISTY DAWN

In The 151st
Judicial District Court
of Harris County, Texas
151ST DISTRICT COURT
Houston, TX

CITATION

THE STATE OF TEXAS
County of Harris

TO: PUNTANEN, BELINDA
OR WHEREVER DEFENDANT MAY BE FOUND
22202 LAUREL PINE CIR KINGWOOD TX 77339

Attached is a copy of FIRST AMENDED ORIGINAL PETITION REQUEST FOR TEMPORARY
RESTRAINING ORDER REQUEST FOR TEMPORARY AND PERMANENT INJUNCTION AND
REQUEST FOR DISCLOSURES

This instrument was filed on the 3rd day of March, 2025, in the above cited cause number
and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a
written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday
next following the expiration of 20 days after you were served this citation and petition,
a default judgment may be taken against you. In addition to filing a written answer with the
clerk, you may be required to make initial disclosures to the other parties of this suit. These
disclosures generally must be made no later than 30 days after you file your answer with the
clerk. Find out more at TexasLawHelp.org.

TO OFFICER SERVING:

This citation was issued on 12th day of March, 2025, under my hand and
seal of said Court.

Issued at request of:
GRANT, JENNIFER A (INDIVIDUALLY
AS THE SOLE MANAGING
CONSERVATOR AND
5850 SAN FELIPE ST
HOUSTON, TX 77057
Tel: (713) 321-0397
Bar No.: 1



Marilyn Burgess
MARILYN BURGESS, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002
(P.O. Box 4651, Houston, Texas 77210)

Generated By: LAWSON, CHANDRA K 22D//12797900

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____ M., on the _____ day of _____, _____.

Executed at (address) _____ in

_____ County at _____ o'clock _____ M., on the _____ day of _____,

_____, by delivering to _____ defendant, in person, a

true copy of this Citation together with the accompanying _____ copy(ies) of the
_____ Petition

attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, _____.

FEE: \$ _____

_____ of _____ County, Texas

Affiant

By _____
Deputy

On this day, _____, known to me to be the person whose
signature appears on the foregoing return, personally appeared. After being by me duly sworn,
he/she stated that this citation was executed by him/her in the exact manner recited on the
return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____, _____.

Notary Public

CAUSE NO. 2025-13614

JENNIFER A. GRANT, INDIVIDUALLY, §
AND AS NEXT FRIEND OF §
A.J.S. and A.L.S., MINORS §

Plaintiff §

VS. §

MISTY DAWN RUNYON, §
KRISTOPHER DAMON RUNYON, §
MICHAEL AUSTIN KROCKER, §
BOE LYNN BOWEN, Individually and §
in his official capacity for, §
THE BOWEN LAW FIRM, PLLC, §
DONNA RENEE WITCHER, §
ENCORE LEGAL PROCESS, INC., §
RANDEE LYNN SOBEL, §
REBA BEDFORD (AKA REBA PETITTO), §
BELINDA PUNTANEN (Individually §
and as next friend of Z.R.M., Minor), §
SAMANTHA JAYE HARRIS, §
THE LAW OFFICE OF §
SAMANTHA J. HARRIS, PLLC, §
BRENDA TAFT EDWARDS, §
ROBYN ELISE SEGAL, §
MADELINE DIANNE RUNYON, §
SAVANNAH SKY RUNYON, §
SIERRA HOPE STEVENS-DREWS, §
ROBERT S. SOBEL (DECEASED), §

DEFENDANTS §

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

151ST JUDICIAL DISTRICT

FIRST AMENDED ORIGINAL PETITION FOR DAMAGES DUE TO
DEFENDANTS' INTERFERENCE WITH PLAINTIFF'S POSSESSORY
INTEREST IN CHILDREN, PROPERTY DAMAGE, CONVERSION,
HARASSMENT, AND INVASIONS OF PRIVACY, REQUEST FOR
COURT TO EXERCISE ITS INHERENT POWER TO REFER FOR
CRIMINAL PROSECUTION, REFER FOR DISCIPLINARY
PROCEEDINGS, REQUEST FOR TEMPORARY RESTRAINING ORDER,
REQUEST FOR TEMPORARY AND PERMANENT INJUNCTIONS, AND
REQUEST FOR DISCLOSURES

PLAINTIFF, JENNIFER A. GRANT, files this *First Amended Original Petition for Damages Due to Defendants' Interference with Plaintiff's Possessory Interest in Children, Property Damage, Conversion, Harassment, and Invasions of Privacy, Request for Court to Exercise Its Inherent Power to Refer for Criminal Prosecution, Refer for Disciplinary Proceedings, Request for Temporary Restraining Order, Request for Temporary and Permanent Injunctions, and Request for Disclosures* showing respectfully as follows:

Preservation of Evidence:

1. **DEFENDANTS ARE PUT ON NOTICE TO PRESERVE AND NOT DESTROY, CONCEAL, OR ALTER ANY EVIDENCE OR POTENTIAL EVIDENCE RELEVANT TO THE ISSUES IN THIS CASE, INCLUDING TANGIBLE DOCUMENTS OR ITEMS IN A DEFENDANT'S POSSESSION OR SUBJECT TO A DEFENDANT'S CONTROL, INCLUDING ELECTRONIC DOCUMENTS, FILES, OR OTHER DATA GENERATED BY OR STORED ON A DEFENDANT'S HOME COMPUTER, WORK COMPUTER, STORAGE MEDIA, PORTABLE SYSTEMS, ELECTRONIC DEVICES, ONLINE REPOSITORIES, OR CELL PHONE.**

Discovery Control Plan

2. Discovery in this case is intended to be conducted under level 3 of rule 190 of the Texas Rules of Civil Procedure. Plaintiff affirmatively pleads that this suit is not governed by the expedited-actions process in Texas Rules of Civil Procedure Rule 169 because Plaintiff requests injunctive relief and monetary relief over \$100,000.00.

Claims for Relief

3. Plaintiff seeks injunctive relief and monetary relief over one million dollars (\$1,000,000.00), including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorneys' fees that are within the jurisdictional limits of this Court and judgment for all the other relief to which Plaintiff is entitled.

4. Pursuant to Texas Civil Rules of Civil Procedure Rule 47, Plaintiff asserts that each of the Defendants who are private citizens have intentionally violated and/or attempted to violate multiple statutes, variously including but not limited to, **Texas Penal Code §§ 15.01, 15.02, 20.02, 25.03-25.031 and 38.12(a)(1) and Texas Family Code § 261.109.** Plaintiff alleges these Defendants have maliciously conspired with one another to personally harm Plaintiff, persons close to Plaintiff, Plaintiff's family, and to financially benefit from the passing of ROBERT S. SOBEL (herein, "Mr. Sobel"), the father of Plaintiff's minor children, an attorney and former employer of six of the named Defendants.

5. Plaintiff has good cause to believe that several of the named private citizen Defendants misappropriated funds and/or converted property causing economic damage to estates. Plaintiff already provided some of the evidence of her contentions to law enforcement, the State Bar of Texas, and filed an affidavit for probable cause detailing some of her allegations for record in other proceedings. Due to the sensitive content within the affidavit which impacts Plaintiff's minor children, Plaintiff has opted to only file it for record within her sealed divorce case;¹ however, upon written request it will be provided subject to any confidentiality order which may be sought and granted.

6. Since nearly all the named Defendants are either attorneys licensed to practice law by the State Bar of Texas, Texas legal paraprofessionals, or associated in other capacities with the legal field, disciplinary proceeding referrals are appropriate to deter future unethical conduct and/or malpractice in order to protect the general public as a whole. Likewise, proceedings to appropriately revoke certification credentials should be instituted as well. Plaintiff requests the Court exercise its inherent power to do so.

7. Plaintiff seeks:

- a. appropriate referrals for criminal prosecution,
- b. referrals to the State Bar of Texas to institute appropriate disciplinary proceedings,
- c. Special injunctive relief, including mandates for education and/or continuing education as to relevant child custody and property laws to be undertaken by employees within the public sector.

8. Plaintiff further asserts that each of the below Interested Parties who are individuals employed in public sectors (*i.e.*, public safety, child protection, criminal prosecution and/or public policy) failed in their professional duties and/or oaths of office by failing to enforce the laws of Texas, and/or to support and uphold the United States Constitution and of this state to the detriment of Plaintiff and her children. Those failures were a breach of the general Public Trust, Public Safety and Public Protection. While Plaintiff does not seek monetary damages from those Interested Parties, Plaintiff does seek special injunctive relief for the future protection of others to prevent others' suffering similarly.

9. Plaintiff has no adequate remedy at law for the harm and injuries Plaintiff has suffered and is suffering from the conduct of the Defendants. Furthermore, no award for monetary damages can compensate Plaintiff for the loss of the affection of her children, nor can they compensate her children for the harm which they have suffered as a consequence of Defendants' and Interested Parties' various actions or omissions.

¹ *Sobel vs. Sobel*; Cause No. 2016-22196; Harris DC 245 (sealed case). See Individual Affidavit for Probable Cause (Jan. 6, 2025).

Parties

10. Plaintiff, JENNIFER A. GRANT (herein variously, “Plaintiff” or “Ms. Grant”), individually, as the Sole Managing Conservator and next friend of A.J.S. and A.L.S., is a resident of Harris County, Texas. The last three numbers of Plaintiff’s driver’s license number are 412. The last three numbers of Plaintiff’s Social Security number are 989.

11. Defendant, MISTY DAWN RUNYON (herein, “Ms. Runyon”), is an individual who resides in Harris County, Texas. Ms. Runyon is jointly and severally liable for her wrongful conduct necessitating these proceedings. Ms. Runyon, although not a party to the suit providing for custody and conservatorship of Plaintiff’s minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that her actions were likely to violate the order. Ms. Runyon may be served with process by serving her at her residence located at 802 Cypresswood Bough, Spring, Texas 77373, or at her work location of Mundy Legal Services, PLLC located at 500 W. Main St., Tomball, Texas 77375, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

12. Defendant, KRISTOPHER DAMON RUNYON (herein, “Mr. Runyon”), is an individual who resides in Harris County, Texas. Mr. Runyon is jointly and severally liable for his wrongful conduct necessitating these proceedings. Mr. Runyon, although not a party to the suit providing for custody and conservatorship of Plaintiff’s minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that his actions were likely to violate the order. Mr. Runyon may be served with process by serving him at his residence located at 802 Cypresswood Bough, Spring, Texas 77373, or through the United States Army Reserves, at 900 W. Rankin Rd., Houston, Texas 77067 or wherever he may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

13. Defendant, MICHAEL AUSTIN KROCKER (herein, “Mr. Krockner”), is an individual who resides in Harris County, Texas. Mr. Krockner is jointly and severally liable for his wrongful conduct necessitating these proceedings. Mr. Krockner, although not a party to the suit providing for custody and conservatorship of Plaintiff’s minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that his actions were likely to violate the order. Mr. Krockner may be served with process by serving him at his residence located at 1503 Palisade Green Dr., Katy, Texas 77493, or at his work location of The Cusic Law Firm, P.C. at 650 N. Sam Houston Pkwy., Suite 406, Houston, Texas 77060 or wherever he may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

14. Defendant, BOE LYNN BOWEN (herein, "Mr. Bowen"), individually and in his official capacity for THE BOWEN LAW FIRM, PLLC, resides in Montgomery County, Texas. Mr. Bowen is jointly and severally liable for his wrongful conduct necessitating these proceedings. Mr. Bowen, although not a party to the suit providing for custody and conservatorship of Plaintiff's minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that his actions were likely to violate the order. Mr. Bowen may be served with process by serving him at his residence located at 21919 Michael Dr., Magnolia, TX 77355, or at his place of business, The Bowen Law Firm, PLLC located at 14202 Champion Forest Drive, Houston, Texas 77069 or wherever he may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

15. Defendant, THE BOWEN LAW FIRM, PLLC (herein, "Bowen Law Firm"), is a domestic professional limited liability company doing business in Harris County, Texas. Pursuant to the Texas Business Corporations Act Art. 2.11, Bowen Law Firm may be served with process pursuant to TRCP 106(a)(1) and/or (2) by delivering in person or mailing by registered or certified mail, return receipt requested, a true copy of the citation and petition to its registered agent, BOE LYNN BOWEN at P.O. Box 692445, Houston, Texas 77269.

16. Defendant, DONNA RENEE WITCHER (herein, "Ms. Witcher"), is an individual who resides in Montgomery County, Texas and may be served with process by serving her at her residence located at 29023 Stone Fox Dr., Spring, Texas 77386, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

17. Defendant, ENCORE LEGAL PROCESS, INC. (herein, "Encore"), is a domestic corporation doing business in Harris County, Texas. Pursuant to the Texas Business Corporations Act Art. 2.11, Encore may be served with process pursuant to TRCP 106(a)(1) and/or (2) by delivering in person or mailing by registered or certified mail, return receipt requested, a true copy of the citation and petition to its President, SHANE SWATZELL at 5444 Westheimer Rd., Suite 1000, Houston, Texas 77056 or at 3703 Caleb Lane, Missouri City, Texas 77459.

18. Defendant, RANDEE LYNN SOBEL (herein, "Ms. Sobel"), individually and in her capacity as purported Applicant/Executrix for the Estate of Robert Sobel resides in Ambler, Pennsylvania. Ms. Sobel is jointly and severally liable for her wrongful conduct necessitating these proceedings. Ms. Sobel, although not a party to the suit providing for custody and conservatorship of Plaintiff's minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that her actions were likely to violate the order. Ms. Sobel is represented by SAMANTHA JAYE HARRIS of THE LAW OFFICE OF SAMANTHA J. HARRIS and may be served with process by serving her through her attorney of record, or at her residence located at 108 Cypress Dr., Ambler, PA 19002, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

19. Defendant, REBA BEDFORD (a/k/a REBA PETITTO), individually and in her capacity as agent for RANDEE LYNN SOBEL (and certain other Defendants) is believed to reside in Harris County, Texas or Ponchatoula, Tangipahoa County, Louisiana. REBA BEDFORD (a/k/a REBA PETITTO) is jointly and severally liable for her wrongful conduct necessitating these proceedings. REBA BEDFORD (a/k/a REBA PETITTO), although not a party to the suit providing for custody and conservatorship of Plaintiff's minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that her actions were likely to violate the order. REBA BEDFORD (a/k/a REBA PETITTO) may be served with process by serving her by public posting and/or through electronic service or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition. Citation by publication or other substituted service is necessary for the reasons stated in the affidavit attached as **Exhibit 1**.

20. Defendant, BELINDA PUNTANEN (herein, "Ms. Puntanen"), resides in Harris County, Texas. Ms. Puntanen is jointly and severally liable individually and she is liable as next friend of Z.R.M., her minor daughter, for their wrongful conduct necessitating these proceedings. Ms. Puntanen (and Z.R.M.), although not a party to the suit providing for custody and conservatorship of Plaintiff's minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that their actions were likely to violate orders in that suit. Furthermore, Ms. Puntanen and Z.R.M. acted as agents for RANDEE LYNN SOBEL and/or as agents of other Defendants. Ms. Puntanen and Z.R.M. are believed to be homeless, but Ms. Puntanen has appeared in other proceedings *pro se* and may be served with process by public posting and by serving her through electronic service, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition. Citation by publication or other substituted service is necessary for the reasons stated in the affidavit attached as **Exhibit 1**.

21. Defendant, SAMANTHA JAYE HARRIS (herein, "Ms. Harris"), individually and in her official capacity for THE LAW OFFICE OF SAMANTHA J. HARRIS, PLLC resides in Waller County, Texas. Ms. Harris is jointly and severally liable for her wrongful conduct necessitating these proceedings. Ms. Harris, although not a party to the suit providing for custody and conservatorship of Plaintiff's minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that her actions were likely to violate the order. Ms. Harris may be served with process by serving her at her residence located at 26246 Shore Dr., Hempstead, Texas 77445, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

22. Defendant, THE LAW OFFICE OF SAMANTHA J. HARRIS, PLLC (herein, "Harris Law Office"), is a domestic professional limited liability company doing business in Harris County, Texas. Pursuant to the Texas Business Corporations Act Art. 2.11, Harris Law Office may be served with process pursuant to TRCP 106(a)(1) and/or (2) by delivering in person or mailing by registered or certified mail, return receipt requested, a true copy of the citation and petition to its registered agent, SAMANTHA JAYE HARRIS at 26246 Shore Dr., Hempstead, Texas 77445 or P.O. Box 207, Hempstead, Texas 77445.

23. Defendant, BRENDA TAFT EDWARDS (herein, "Ms. Edwards") is an individual who resides either in Galveston County, Texas or Tom Green County, Texas. Ms. Edwards is jointly and severally liable for her wrongful conduct necessitating these proceedings. Ms. Edwards, although not a party to the suit providing for custody and conservatorship of Plaintiff's minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that her actions were likely to violate the order. Ms. Edwards may be served with process by serving her at her residence located at 2124 Bowline Road, Texas City, Texas 77568, or at her alternate residence located at 1825 North St., San Angelo, Texas 76901, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition. Citation by publication or other substituted service is necessary for the reasons stated in the affidavit attached as **Exhibit 1**.

24. Defendant, ROBYN ELISE SEGAL (herein, "Ms. Segal"), is an individual who resides in Harris County, Texas. Ms. Segal is jointly and severally liable for her wrongful conduct necessitating these proceedings. Ms. Segal, although not a party to the suit providing for custody and conservatorship of Plaintiff's minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that her actions were likely to violate the order. Ms. Segal may be served with process by serving her at her residence located at 7619 Bankside Dr., Houston, Texas 77071, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

25. Defendant, MADELINE DIANNE RUNYON (herein, "Madeline"), is an individual who resides in Harris County, Texas. Madeline is jointly and severally liable for her wrongful conduct necessitating these proceedings. Madeline, although not a party to the suit providing for custody and conservatorship of Plaintiff's minor children, had actual notice of the existence and contents of the order or had reasonable cause to believe that the children were the subject of a court order and that her actions were likely to violate the order. Madeline may be served with process by serving her at her residence located at 9603 Paloma Creek Dr., Tomball, Texas 77375, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

26. Defendant, SAVANNAH SKY RUNYON (herein, "Savannah"), is an individual who resides in Harris County, Texas and may be served with process by serving her at her residence located at 802 Cypresswood Bough, Spring, Texas 77373, or at her work location of Wunsche Bros. Cafe & Saloon located at 103 Midway St., Spring, Texas 77373, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

27. Defendant, SIERRA HOPE STEVENS-DREWS (herein, "Sierra"), is an individual who resides in Harris County, Texas and may be served with process by serving her at her residence located at 802 Cypresswood Bough, Spring, Texas 77373, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

28. Defendant, ROBERT S. SOBEL (herein, "Mr. Sobel"), is an individual who resided and deceased in Harris County, Texas. Service of process is unnecessary. Notice of these proceedings will be provided through electronic service to the attorneys in probate proceedings.

Public Sector Interested Parties

29. Interested Party, MATIAS PEREZ, is a detective for the Houston Police Department. Service of citation upon MATIAS PEREZ shall be made at 1200 Travis St., Houston, Texas 77002. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

30. Interested Party, STEPHEN JIMENEZ, is a police sergeant in the Houston Police Department. Service of citation upon MATIAS PEREZ shall be made at 1200 Travis St., Houston, Texas 77002. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

31. Interested Party, DARIUS NEWSOME, is a Harris County Constable Deputy. Service of citation upon DARIUS NEWSOME shall be made at 6831 Cypresswood Dr., Spring, Texas 77379. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

32. Interested Party, TYSON HAMILTON, is a Harris County Constable Deputy. Service of citation upon TYSON HAMILTON shall be made at 6831 Cypresswood Dr., Spring, Texas 77379. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

33. Interested Party, LIDIA AMAYA, is a Harris County Constable Deputy. Service of citation upon LIDIA AMAYA shall be made at 6831 Cypresswood Dr., Spring, Texas 77379. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

34. Interested Party, TODD RITZ, is a Harris County Constable Deputy. Service of citation upon TODD RITZ shall be made at 6831 Cypresswood Dr., Spring, Texas 77379. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

35. Interested Party, DAMON RICHARDSON, is a Harris County Constable Deputy. Service of citation upon DAMON RICHARDSON shall be made at 6831 Cypresswood Dr., Spring, Texas 77379. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

36. Interested Party, LUIS ALEJO, is a Harris County Constable Sergeant. Service of citation upon LUIS ALEJO shall be made at 6831 Cypresswood Dr., Spring, Texas 77379. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

37. Interested Party, GINNEAN L. CLEVELAND (herein, “Ms. Cleveland”), is an individual who resides in Brazoria County, Texas and may be served with process by serving her at her work location of Harris County Domestic Relations Office located at 1310 Prairie, Suite 700, Houston, Texas 77002, or wherever she may be found. Service is requested and payment for the issuance of citations is remitted with the filing of this petition.

Private Sector Interested Parties

38. Interested Party, ANGELA A. STOUT (herein, “Ms. Stout”), is an attorney who was a Court appointed amicus attorney in Cause No. 2016-22196. She will receive notice of these proceedings electronically. Plaintiff has named her as an Interested Party because she is owed monies as a result of her representation in those custody proceedings.

39. Interested Party, MARIA L. SCHNEBLY (herein, “Ms. Schnebly”), is an attorney who represented Plaintiff in Cause No. 2016-22196. She will receive notice of these proceedings electronically. Plaintiff has named her as an Interested Party because she is owed monies as a result of her representation in those custody proceedings.

Jurisdiction & Venue

40. The Court has personal jurisdiction, both general and specific, over the parties because all or a substantial part of the events occurred in Harris County, Texas.

41. The Court has subject-matter jurisdiction because the amount in controversy exceeds the minimum jurisdictional threshold. Additionally, the Court has jurisdiction to grant the injunctive relief requested.

42. All or a substantial part of the events or omissions giving rise to the claim occurred within Harris County, Texas. Therefore, the venue is proper pursuant to Texas Civil Practice and Remedies Code §§ 15.001 and 15.002. Additionally, the venue is proper because the facts will show that the convenience of the parties, certain witnesses and the interest of justice would best be served in Harris County, Texas.

Facts

43. Plaintiff and Mr. Sobel were married on January 18, 2007. After years of extreme marital discord and cruel treatment, which included family violence, adultery, and other harmful conduct of Mr. Sobel, Ms. Grant finally gathered the courage to leave him in or about March of 2016, and they divorced on March 9, 2018. During the divorce and continuing until his death, Mr. Sobel engaged in a course of conduct calculated to harass, embarrass, and annoy Ms. Grant, to destroy or significantly impair the relationship existing between Ms. Grant and their minor children, and to seriously jeopardize Ms. Grant’s employment and professional reputation. Mr. Sobel employed agents and attorneys to assist him in those endeavors, including Ms. Runyon and her husband, Mr. Runyon (collectively, “the Runyons”) and other Defendants. Ms. Grant detailed these facts further in an *Individual Affidavit for Probable Cause* on January 6, 2025.²

² *Id.* ft. 1

44. Ultimately, crimes were reported, and lawsuits were filed by and against multiple third parties who were witnesses in Plaintiff's divorce proceedings. Mr. Sobel and Plaintiff were named as Joint Managing Conservators for their children and Mr. Sobel was given the right to establish the children's domicile. On January 5, 2023, Mr. Sobel died at home. Pursuant to statute, common law and constitutions, Plaintiff became Sole Managing Conservator of their children, A.L.S. and A.J.S. and had the sole right of their possession.

45. Since 2014, Ms. Grant has been subjected to the following (non-exhaustive) crimes and tortious acts of malice variously by certain Defendants resulting in her extreme emotional distress, injuries to her personal and professional reputation, and economic losses:

- a. Assault and battery,^{3,4,5}
- b. Solicitation of Plaintiff's murder,⁶
- c. Computer hacking, cyberstalking and harassment,^{7,8}
- d. Parental alienation,
- e. Personal and professional defamation,
- f. Mail theft,⁹
- g. Institution of two lawsuits unlawfully filed by Ms. Runyon and Mr. Runyon through their attorneys for sole conservatorship of Ms. Grant's minor children,¹⁰
- h. Theft of services by Ms. Puntanen,¹¹
- i. Theft of monies for the exclusive benefit and support Ms. Grant's minor children by Misty Runyon,
- j. Violations of privacy and dissemination of confidential materials from Plaintiff's divorce proceeding,
- k. False police reports filed by certain Defendants,¹²

³ Reported to Houston Police Department in 2014; Incident No. 1308648-14

⁴ Reported to Precinct 4 Harris County Constables; No. 2412-00954

⁵ Cause No. 2016-22196; *Sobel v. Sobel*, 245th DC (Harris); See Notice of Filing of (Second) Affidavit of Andrew Blake Smith (Feb. 5, 2025)

⁶ Reported to Houston Police Department in 2017; Incident No. 1352884-17

⁷ Reported to Houston Police Department in 2020; Incident No. 1201414-20

⁸ *Id.* ft. 1

⁹ Reported to Federal Postal Inspectors; Service Request Numbers: 51637560 and 51637720

¹⁰ Cause No. 2016-22196; *Sobel v. Sobel*, 245th DC (Harris) on January 24, 2023, and September 9, 2024

¹¹ *Grant vs. Puntanen et al*; Case No. 1233110, Harris CCL 2; See Affidavit of Criminal Complaint (May 20, 2024)

¹² **Exhibit 2**

- l. On multiple occasions, Ms. Grant's home with her children was broken into, thousands of dollars in property damage caused, and property was stolen from the residence,^{13,14}
- m. Two years of interference with Ms. Grant's exclusive right to custody of her minor children,¹⁵
- n. Interference by Ms. Runyon in the critical and necessary medical treatment of Ms. Grant's minor daughter by disseminating Ms. Grant's confidential divorce decree to mislead medical providers,¹⁶
- o. Personal and professional defamation of Ms. Grant's life partner who is a physician,¹⁷
- p. Personal defamation of Ms. Grant's adult son, specifically that he was convicted of murder,¹⁸
- q. Unnecessary prolonging of all proceedings involving her children by the Runyons, their attorneys and agents to the extreme detriment of all impacted parties and estates,
- r. Since Plaintiff recovered the care and control of her children on or about February 17, 2025, a knowingly false report was intentionally made to Texas Department of Family and Protective Services (DFPS Case No. 50454817, Investigator S. Emanuel) **in violation of Texas Family Code 261.107** to deceive investigators and to harass Plaintiff alleging:
 - i. [Ms. Sobel] was given custody of [Plaintiff's] children,
 - ii. [Plaintiff] only want [Plaintiff's] children for their Social Security,
 - iii. [Plaintiff] dropped [Plaintiff's] children at their grandfather's house without being properly prepared,
 - iv. [Plaintiff] was high on drugs,
 - v. [A.L.S.] has failing grades, and
 - vi. [Plaintiff] is not a paralegal,

¹³ Reported to Houston Police Department in 2023; Incident No. 1335817-23

¹⁴ Reported to Houston Police Department in 2024; Incident No. 0257921-24

¹⁵ Cause No. 2016-22196; *Sobel v. Sobel*, 245th DC (Harris) (Sealed Case); *See* Order Denying Relief in Suit to Modify (Feb. 6, 2025)

¹⁶ *Id.* ft. 1; Exhibits 1B-1D

¹⁷ **Exhibit 3** (Redacted)

¹⁸ *Id.* ft. 5

- s. Since Plaintiff recovered the care and control of her children on or about February 17, 2025, Plaintiff has received harassing and threatening emails from Ms. Sobel and Defendant, REBA BEDFORD (a/k/a REBA PETITTO).

46. On February 5, 2023, Plaintiff suffered traumatic brain injuries and was hospitalized for nearly a month with multiple skull fractures in a coma following an ATV accident. Solely because Plaintiff's minor children were out of school for a holiday break the week of February 6, 2023, her survival uncertain, and her parents wanted to remain with her, they allowed A.L.S. to spend the week at the home of Ms. Runyon and Mr. Runyon with A.J.S. who had been permitted to stay with them on a short temporary basis for reasons related to renovations taking place in Plaintiff and the children's home since January 11, 2023. The Runyons were instructed to return A.L.S. to her parents on February 12, 2023.¹⁹ However, they refused to return A.L.S. over her parents' instruction. Plaintiff alleges that Defendants colluded in acquiring and retaining possession of Plaintiff's children over Plaintiff's countless demands directly, through her agents, and through her attorneys despite demonstration of their lack of Plaintiff's consent, their lack of legal authority and their lack of any right to do so.^{20,21}

47. Unbeknownst to Plaintiff, and certainly without her permission or any legal authority, through their former attorneys, Mr. Krockert, Mr. Bowen and Bowen Law Firm, they had unlawfully instituted proceedings for sole custody of Plaintiff's minor daughter, A.J.S. on January 24, 2023, later amending their petition on February 10, 2023, to include Plaintiff's minor son, A.L.S. On February 28, 2023, while recuperating with a wired jaw and under strict doctors' orders of bed rest, Plaintiff was served with deficient and defective process by Ms. Witcher.²² Many months later, from written discovery performed in a prior dismissed custody proceeding, Plaintiff learned that Ms. Witcher was a certified process server with Encore.

48. A highly experienced family law paralegal with trial experience rivaling attorneys, Plaintiff immediately recognized the defective service of process because Plaintiff was not served with a petition or application which would inform a responding party in a legal proceeding of the petitioning parties' requested relief, the attorney's address was incorrect, and because the citation itself was missing a time for the purported injunction hearing.²³ Over and above the defective service of process, the legal proceedings were entirely unlawful because the petitioning parties wholly lacked legal standing to bring them. Within minutes of Plaintiff being served the defective process, Plaintiff notified Ms. Runyon and Mr. Runyon directly and again a few hours later through their attorneys of the defective service, that they lacked legal standing to obtain any of their requested relief and demanded the return of her minor children.²⁴ The Runyons did not return Plaintiff's children.

¹⁹ *Id.* ft. 1; Exhibits 2-2A

²⁰ Letter from Plaintiff's former family case attorney, Maria Schnebly (April 30, 2023) attached as **Exhibit 4**

²¹ *Id.* ft. 1 (at Exhibit 3 and Exhibit 5)

²² *Id.* ft. 1 at pp. 171-182.

²³ *Id.* ft. 22

²⁴ *Id.* ft. 1 at pp. 9-11

49. Worse yet, on March 1, 2023, when Plaintiff went to the home where her children were being unlawfully restrained to personally recover her children, Ms. Runyon called law enforcement to prevent her recovering possession of her children. Ms. Runyon falsely told them that she had been given custody of Plaintiff's children by their deceased father.²⁵ Although the restraining order had, by operation of law, expired and Plaintiff had conveyed as much to relevant parties, the responding deputies with Harris County Precinct 4 Constable's Office refused to compel the return of her children in violation of Plaintiff's statutory and constitutional protected rights as their mother, incorrectly stating Plaintiff needed to go to court and set up an agreed visitation leaving Plaintiff with no other choice but to leave.

50. On or about March 31, 2023, Plaintiff was shocked to learn that a default had been taken against her as a result of the wrongful actions of certain Defendants. More specifically, Mr. Krockner, Ms. Runyon and Mr. Runyon intentionally and wrongfully convinced the 245th Judicial District Court's presiding judge to proceed with a hearing for temporary orders on March 7, 2023, by presenting false (both on their face and in fact) Affidavits of Service in order to fraudulently secure a default against Plaintiff.^{26,27} After repeated delays by certain parties and the Runyons' refusal to return Plaintiff's minor children, Plaintiff obtained a transcript of that hearing which further showed that, on March 7, 2023, both Ms. Runyon and Mr. Runyon committed aggravated perjury during that proceeding. Moreover, since discovering all of this and continuously to date, Plaintiff repeatedly made these facts known to most of the Defendants and reported the same to the Interested Parties.

51. Still worse, in addition to the general, collective unlawful restraint and conspiracies to restrain and interfere with Plaintiff's custody of her children, Mr. Runyon assaulted Plaintiff on August 26, 2023, when Plaintiff attempted to recover her children **in violation of Texas Penal Code §§ 22.01 and 25.03**.²⁸ Compounding this personal assault and general assault of justice, within a few days of the assault event, on September 17, 2023, Plaintiff discovered that her home shared with the children had been broken into on September 16, 2023. On February 5, 2023, Plaintiff legally possessed personal property located within the premises at 22202 Laurel Pine Cir., Kingwood, Texas 77339. Plaintiff had a right to immediate possession of the personal property which was removed on or about September 16, 2023. Certain Defendants wrongfully acquired and exercised dominion and control over the personal property by breaking into the premises and removing the property, refusing to return it ever since despite being demanded to do so directly and through attorneys on multiple occasions. The Defendants who have refused to return the property on Plaintiff's demand have committed acts which amount to a clear repudiation of Plaintiff's rights.

²⁵ *Id.* ft. 12

²⁶ *Id.* ft. 1 pp. 211-212

²⁷ Cause No. 2016-22196; *Sobel v. Sobel*, 245th DC (Harris) (Sealed Case); *See* Emergency Motion to Modify Temporary Orders and Request for Writ of Attachment (June 30, 2023)

²⁸ *Id.* ft. 1 and ft. 5

52. Plaintiff has good cause to believe that Mr. Runyon, Ms. Runyon and their agents are the ones who broke into Plaintiff's home because Plaintiff has seen photographs on social media of items in their possession which had been within their home on September 15, 2023. Moreover, the majority of the items which are missing were items belonging to Plaintiff's children and to the estate of Mr. Sobel. Notably, during their alleged unlawful action, they caused significant physical damage to the actual premises.²⁹ All of these events prompted Plaintiff to file applications for protective orders against Ms. Runyon and Mr. Runyon. Unfortunately, however, Plaintiff was unable to attend the first hearing for her protective order application because her mother was on her deathbed and, in fact, died five days later.^{30,31}

53. Furthermore, (all) the Runyons, Mr. Krockner, Ms. Harris, Ms. Edwards, Ms. Segal, and Ms. Stevens-Drews, have enormously disparaged and defamed Plaintiff to her children and others (e.g., making outrageously false allegations that Plaintiff has threatened Mr. Runyon's life³² and physically threatened Ms. Runyon, that Plaintiff has been practicing law and stealing Mr. Sobel's legal clients, lying to her children about court proceedings and about events that have occurred. More specifically, the children were told on or about December 1, 2023, before Ms. Thompson passed away from her aggressive lung cancer, that Plaintiff had said her mother died "to get out of court." Plaintiff has even read recent police reports wherein Mr. Runyon outrageously lied to Harris County Precinct 4 Constables claiming to be her children's "godfather," and he lied to Ms. Cleveland that Plaintiff's adult son was convicted of murder).

54. In addition to the multiple false police reports filed with Harris County Precinct 4 Constables and Houston Police Department, Plaintiff will show that certain Defendants filed false complaints with the Texas Medical Board about Plaintiff and her life partner alleging she was his patient, they are in an inappropriate sexual relationship, he prescribes her medications, and that he was providing her legal advice about the assets of her "spouse" which necessitated their hire of multiple attorneys to defend his medical license.³³ Additionally, false complaints of unauthorized practice of law were made about Plaintiff necessitating her hiring of attorneys to represent her in proceedings.

²⁹ **Exhibit 1**

³⁰ *Grant vs. Runyon*; Cause No. 2023-73807; Harris DC 280

³¹ *Grant vs. Runyon*; Cause No. 2023-73809; Harris DC 280

³² *Id.* ft. 12

³³ *Id.* ft. 17

55. Along with those false professional complaints made by certain parties, in or about May of 2023, a false complaint was made to the Texas Real Estate Commission by Ms. Sobel (and/or her agents) falsely claiming that Mr. Sobel had left the real property located at 22202 Laurel Pine Cir., Kingwood, Texas 77339 (*i.e.*, Plaintiff's residence with her children) to her in his will, that she was probating his will, and that Plaintiff "had no rights to the house and has been squatting" in the home. Aside from the fact that Ms. Sobel was grossly mistaken about her allegations and Plaintiff's rights to the property, it is interesting to note that Ms. Sobel is the Applicant/Executrix in a proceeding to probate that purported will which makes no such mention of the property bequeathment. Furthermore, on October 6, 2024, subsequent to Ms. Sobel's application, she accused Plaintiff of "doctoring" the very same will she is currently attempting to probate through Ms. Harris. Plaintiff has already alleged the will to be phony.³⁴

56. Ultimately, Plaintiff was forced to file a petition for a writ of mandamus and two different petitions for writ of habeas corpus. Unsurprising, the mandamus proceedings were glacially slow, but Plaintiff ultimately prevailed after nearly two years. On June 11, 2024, the Fourteenth Court of Appeals issued its Memorandum Opinion conditionally granting Plaintiff's petition for mandamus to vacate the wrongfully obtained Default Temporary Orders. On September 25, 2024, a hearing was held on Ms. Runyon and Mr. Runyon's requested relief for temporary orders and on Plaintiff's plea to the jurisdiction. After the hearing, Hon. Judge Angela Lancelin, Presiding Judge of the 245th Judicial District Court of Harris County, Texas, found that the allegations made by Ms. Runyon and Mr. Runyon were inadequate to support their claims for relief and their suit for custody of Plaintiff's children suit to modify was filed frivolously or designed to harass Plaintiff.

57. Throughout the last two years of legal proceedings, Plaintiff continuously reported the crimes and conspiracies of Defendants to Houston Police Department and to Harris County Constables and pleaded for the assistance of law enforcement and child protective services. Defendants delayed the proceedings over and over. Suddenly, before the scheduled hearing for Plaintiff's most recently filed petition for a writ of habeas corpus, her children were returned to her care and control on or about February 17, 2025. Plaintiff avers that their sudden return constitutes an indirect admission of Defendants' knowledge that their wrongful actions were constitutionally and statutorily illegal.

58. From February 28, 2023, continuously through February 12, 2025, Plaintiff directly and through her attorneys sought her children's return in writing, in person and through the Courts.³⁵ On countless occasions, Plaintiff informed the Defendants of the pertinent facts and law which proved the commission of crimes against Plaintiff and her minor children. All the Defendants had affirmative duties to act by reporting the crimes committed by other Defendants impacting Plaintiff and her children but failed to do so to the detriment of Plaintiff, her children, Plaintiff's family members, and to relevant estates.

³⁴ *Id.* ft. 1 and ft. 29

³⁵ *E.g.*, Letter from Plaintiff's former family case attorney, Maria Schnebly (April 30, 2023) attached as **Exhibit 4**

59. As to any Defendant who failed to take appropriate actions to report the crimes and/or cooperate with investigations and requests for information, Plaintiff asserts he or she intentionally failed to do so for selfish and/or malicious reasons. Therefore, those Defendant(s) are complicit in the wrongful acts alleged and responsible for the resulting emotional harms to persons and financial damages to estates. As a consequence of Defendants' various actions and omissions, Plaintiff's mother, Kelly Thompson, did not see her grandchildren again after their visit to Plaintiff in the hospital in or about February of 2023 (before Ms. Thompson's aggressive lung cancer diagnosis). Ms. Thompson is the only grandmother Plaintiff's children have ever known.

60. The Defendants have intentionally intruded upon Plaintiff's seclusion and private affairs, have disclosed private facts about Plaintiff and her children of a kind that would be highly offensive to a reasonable person and the information publicized was not of legitimate public concern. Many of the Defendants have openly demonstrated their vitriol and malice via communications with Plaintiff and publications on social media. Many of the Defendants have trespassed upon real property, caused physical damage to real and personal property, and all the Defendants have intentionally and maliciously caused Plaintiff and her minor children severe emotional distress and damage to their reputations.

Damages

61. As the result of the unlawful, wrongful and malicious individual and collective actions of the Defendants, Plaintiff seeks recovery of damages under chapter 42 of the Texas Family Code from Ms. Runyon, Mr. Runyon, Mr. Krockner, Mr. Bowen, Bowen Law Firm, Ms. Witcher, Encore, Ms. Sobel, Ms. Puntanen, Z.R.M., Ms. Harris, Ms. Edwards, Ms. Segal, Madeline, Savannah, Sierra and Mr. Sobel's estate.

62. Plaintiff should be awarded the following actual, economic and exemplary damages:

- a. The actual costs and expenses of Plaintiff, including reasonable attorney fees, in recovering the possession of the children.
- b. The actual costs and expenses, including reasonable attorney's fees, incurred by Plaintiff in enforcing the court order that was violated.
- c. The actual costs and expenses, including reasonable attorney's fees, of bringing this suit under chapter 42 of the Texas Family Code.
- d. The dissipation of the value of the children's inherited estates and for the total of actual misappropriated monies that were to be used exclusively for the children's benefit but were not.
- e. Actual economic damages in the amount of her lost wages and earnings since March 1, 2023, of not less than one hundred eighty thousand dollars (\$180,000.00).
- f. The value of mental suffering and anguish incurred by Plaintiff as the result of their malicious and unlawful acts.

- g. The value of mental suffering and anguish incurred by A.J.S. and A.L.S. as the result of their malicious and unlawful acts.
- h. The value of mental suffering and anguish incurred by Plaintiff's family as the result of their malicious and unlawful acts.
- i. The actual costs and expenses incurred as a result of therapy and other treatment for Plaintiff and her children required as the result of their malicious and unlawful acts.

63. Defendants breached duties and proximately caused injuries to Plaintiff, A.J.S. and A.L.S. for property damage which resulted in the following damages:

- a. Market-value damages for destroyed or permanently injured improvements, which is the difference between the property's value immediately before and immediately after the damage,
- b. Replacement-value damages, which is the cost of replacing or reproducing the property,
- c. Actual- or intrinsic-value damages, which is the value of the property to plaintiff in the condition it was in when it was damaged,
- d. Actual- or intrinsic-value damages for destroyed improvements, because there is no market value for the improvements,
- e. Damages for the cost of repairs and loss of use for temporary injury to improvements,
- f. Lost profits directly attributable to defendants' injury to the real property,
- g. Sentimental value damages, which is the reasonable special value of the property to Plaintiff, A.J.S. and A.L.S.,
- h. Repair damages, which is the value of the reasonable cost of repairs,
- i. Loss-of-use damages, which is the reasonable cost of renting a replacement,
- j. Lost profits, which is the value for the loss of anticipated profits, and
- k. Mental-anguish damages for egregious conduct.

64. As a direct and proximate cause of Defendants' intentional acts and omissions, Plaintiff and her minor children suffered injuries, including severe emotional distress, actual monetary damages, diminished earning capacity, and irrecoverable time together and with family. Plaintiff seeks recovery of damages from all Defendants. Plaintiff's damages exceed the minimal jurisdictional limits of the Court, and include but are not limited to:

- a. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future,
- b. Loss of earnings in the past,
- c. Loss of earning capacity which will, in all probability, be incurred in the future,
- d. Mental anguish in the past,
- e. Mental anguish in the future,
- f. Property theft and conversion,
- g. Property damage,
- h. Legal fees and expenses,
- i. Education opportunities,
- j. Employment and business opportunities,
- k. Lost profits directly attributable to Defendants' injury to real property, and
- l. Freedom to enjoy life in peace, to heal and to live without fear.

Exemplary Damages

65. Because Defendants acted with malice and/or intent to cause harm to Plaintiff, Plaintiff should be awarded exemplary damages in the amount of not less than ten million dollars (\$10,000,000.00) which represents a total of one hundred thousand dollars per week for each week to date since March 1, 2023 through February 17, 2025 in which Plaintiff's children were unlawfully restrained and withheld from her custody and control.

66. The injuries sustained by Plaintiff and her minor children resulted from Defendants' malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a)(2).

REQUEST FOR COURT TO EXERCISE ITS INHERENT POWER
Court Intervention Is Necessary for Violations of Statutes and/or Prior Court Orders

67. Plaintiff alleges that Defendants and their agents have violated statutes and prior court orders as detailed in her *Individual Affidavit for Probable Cause* filed for record in other proceedings along with numerous affidavits and declarations filed by Plaintiff since March 2023.^{36,37,38,39,40} Plaintiff asserts that Court intervention is required for Plaintiff to obtain any relief in this matter, including but not limited to the following reasons:

- a. The attorney defendants are officers of the Court and thus remain in a “zone of twilight” between attorney(s) of record, alleged civil and criminal conspirators, and fact witnesses. Plaintiff cannot question them as an attorney because of attorney-client privilege,
- b. Plaintiff cannot question them in any other capacity,
- c. Plaintiff does not have independent subpoena power with regard to Plaintiff’s allegations,
- d. There are no “hard copies” of certain court orders that were violated, but rather, violations of a statute, and/or violations of orders in prior proceedings with which Defendants were not a party to but had knowledge of their unlawful acts,
- e. Interested parties are witnesses and work in the public sector and therefore Court intervention is required to obtain relief from their actions, as they are not directly subject to any specific Court Order. Simply put, without intervention, this causes Plaintiff actual prejudice, and
- f. Because the Court could, upon adequate findings, make such a referral itself to the Harris County District Attorney’s Office, appropriate Commissions, and to the State Bar of Texas in the interest of preservation of public trust.

The Court Has Inherent Power to Grant Relief

68. Plaintiff has filed multiple criminal complaints and exhaustively reported to law enforcement and agencies about the illegal actions described herein and other proceedings.

³⁶ *Id.* ft. 1 generally

³⁷ *Sobel vs. Sobel*; Cause No. 2016-22196; Harris DC 245 (sealed case)

³⁸ *Grant vs. Runyon*; Cause No. 2023-73807; Harris DC 280

³⁹ *Grant vs. Runyon*; Cause No. 2023-73809; Harris DC 280

⁴⁰ *In re Grant*, No. 14-23-00408-CV, COA 14 (per curiam)

69. Plaintiff asserts that the Court alone has the inherent authority to remedy this situation. Case law is replete with confirmation of the principle that Texas Courts have the inherent power to impose sanctions without the authority of either a Rule or Statute. *See e.g., Kutch vs. Del Mar College*, 831 S.W.2d 506, 509 (Tex. App.- Corpus Christi 1992, no writ) (Court sanctioned plaintiff with dismissal for failure to replead after special exceptions were granted). The Court's holding in *Kutch* flatly stated, "Texas courts have inherent power to sanction for bad faith conduct during litigation." *Kutch*, 831 S.W.2d at 509. The *Kutch* Court further held that the inherent power to impose sanctions relates to "core functions of the judiciary, which are: hearing evidence, deciding issues of fact raised by the pleadings, deciding questions of law, entering final judgments and enforcing that judgment." *Id.*

70. The *Kutch* Court also stated, "Accordingly, for inherent power to apply, there must be some evidence and factual findings that conduct complained of significantly interfered with the court's legitimate exercise of one of these powers." *Id.* at 510. The *Kutch* Court stated that "a court's 'implicit' power to sanction was governed by the justness or appropriateness standard which was later developed in *Transamerican*," referring to *Transamerican Natural Gas v. Powell*, 811 S.W.2d 913 (Tex. 1991). *Kutch*, 832 S.W.2d at 511.

71. This standard requires that a "direct relationship must exist between the offensive conduct and the sanction imposed," meaning that "the sanction must be directed against the abuse and toward remedying the prejudice caused the innocent party" and "that the sanction should be visited upon the offender." *Transamerican*, 811 S.W.2d at 917. This requires the Court "attempt to determine whether the offensive conduct is attributable to counsel only, or to the party only, or both." *Id.* *Transamerican* stated that "a party should not be punished for counsel's conduct in which it is not implicated apart from having entrusted to counsel its legal representation." *Id.* And "just sanctions must not be excessive. The punishment should fit the crime." *Id.* The Court "must consider the availability of less stringent sanctions and whether such lesser standards would fully promote compliance." *Id.*

72. Plaintiff asserts that the Court has the inherent power to sanction Defendants for their conduct, and further asserts sanctions are appropriate in this instance as a result of bad faith on the part of Defendants and/or their agents. Plaintiff asserts that the Court has inherent authority to sanction Defendants for bad faith litigation in accordance with the Court's holding in *Mattly v. Spiegel, Inc.* 19 S.W.3d 890, 896 (Tex. App.- Houston [14th Dist.] 2000, no pet.) ("Bad faith does not exist when a party exercises bad judgment or negligence; it is the conscious doing of a wrong for dishonest, discriminatory, or malicious purposes."); see also *Kutch v. Del Mar College* 832 S.W.2d at 510 (a finding of bad faith is necessary to impose sanctions under the trial court's inherent power).

73. Plaintiff asserts that based on the facts alleged, information and cited authority, Defendants should be ordered to appear before the Court and show cause as to why they should not be subject to sanctions for their intentional and willful violations of prior orders and statutes. Plaintiff asserts that the Court has inherent authority to make Orders and sanction Defendants in the manner requested herein pursuant to the case law authority cited above.

Request for Temporary Restraining Order

74. Ms. Grant and her minor children will suffer irreparable harm, damage, and injury unless the Defendants are restrained immediately and without notice and hearing from committing the acts described, because these actions have affected Ms. Grant's ability to earn, to enjoy life in peace, to develop herself professionally (*i.e.*, prepare for and attend law school), and to direct her necessary attention to other critical issues affecting Ms. Grant, her children, their family and to other matters of public concern because Ms. Grant operates two nonprofits for community services and public safety.

75. Plaintiff requests the Court to dispense with the necessity of a bond, and Plaintiff requests that Defendants be temporarily restrained immediately, without hearing, and after notice and hearing be temporarily enjoined, pending the further order of this Court, from:

- a. asserting any legal privileges as to confidentiality to law enforcement, civil discovery, or other investigations,
- b. asserting any legal privileges as to confidentiality or avoiding efforts to obtain testimony regarding Plaintiff's allegations,
- c. objecting to Plaintiff's requests for discovery and inspection,
- d. Intentionally communicating with Plaintiff in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging, by use of vulgar, profane, obscene, or indecent language or in a coarse or offensive manner, with intent to annoy or alarm Plaintiff,
- e. Threatening Plaintiff in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging, to take unlawful action against any person, intending by this action to annoy or alarm Plaintiff,
- f. Placing a telephone call, anonymously, at any unreasonable hour, in an offensive and repetitious manner, or without a legitimate purpose of communication with the intent to annoy or alarm Plaintiff,
- g. Intentionally, knowingly, or recklessly causing bodily injury to Plaintiff or her children,
- h. Threatening Plaintiff or her children with imminent bodily injury,
- i. Intentionally, knowingly, or recklessly destroying, removing, concealing, encumbering, transferring, or otherwise harming or reducing the value of the property of Plaintiff or her children with intent to obstruct the rights of Plaintiff and/or her children or the authority of the Court,

- j. Intentionally falsifying a writing or record, including an electronic record, relating to the property of Plaintiff, her children, or an estate of the parties,
- k. Intentionally misrepresenting or refusing to disclose to Plaintiff or to the Court, on proper request, the existence, amount, or location of any tangible or intellectual property of Plaintiff, her children, or an estate of the parties, including electronically stored or recorded information,
- l. Intentionally or knowingly damaging or destroying the tangible or intellectual property of Plaintiff, her children, or an estate of the parties, including electronically stored or recorded information,
- m. Intentionally or knowingly tampering with the tangible or intellectual property of Plaintiff, her children, or an estate of the parties, including electronically stored or recorded information, and causing pecuniary loss or substantial inconvenience to Plaintiff,
- n. Selling, transferring, assigning, mortgaging, encumbering, or in any other manner alienating any of the property of Plaintiff, her children, or an estate of the parties, whether personal property, real property, or intellectual property, except as specifically authorized by order of this Court,
- o. Withdrawing, transferring, assigning, encumbering, selling, or in any other manner alienating any funds or assets held in any brokerage account, mutual fund account, or investment account of Plaintiff, her children, or an estate of the parties, regardless of whether the funds or assets are community or separate property and whether the accounts are self-managed or managed by a third party, except as specifically authorized by order of this Court,
- p. Withdrawing or borrowing money in any manner for any purpose from any retirement, profit-sharing, pension, death, or other employee benefit plan, employee savings plan, individual retirement account, or Keogh account of Plaintiff, her children, or an estate of the parties, except as specifically authorized by order of this Court,
- q. Entering any safe-deposit box in the name of or subject to the control of Plaintiff, her children, or an estate of the parties, whether individually or jointly with others,
- r. Canceling, altering, failing to renew or pay premiums on, or in any manner affecting the level of coverage that existed at the time this suit was filed of, any life, casualty, automobile, or health insurance policy insuring the parties' property or persons, including Plaintiff's children,
- s. Opening or diverting mail or e-mail or any other electronic communication addressed to Plaintiff, her children, or another party,

- t. Signing or endorsing Plaintiff's name on any negotiable instrument, check, or draft, including a tax refund, insurance payment, and dividend, or attempting to negotiate any negotiable instrument payable to Plaintiff without the personal signature of Plaintiff,
- u. Destroying, disposing of or altering any financial records of the parties, including but not limited to a canceled check, deposit slip, and other records from a financial institution, a record of credit purchases or cash advances, a tax return, and a financial statement,
- v. Destroying, disposing of, or altering any e-mail, text message, video message, or chat message or other electronic data or electronically stored information relevant to the subject matter of this case, whether stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium,
- w. Modifying, changing, or altering the native format or metadata of any electronic data or electronically stored information relevant to the subject matter of this case, whether stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium,
- x. Deleting any data or content from any social network profile used or created by Plaintiff, her children, or another party,
- y. Using any password or personal identification number to gain access to another party's e-mail account, bank account, social media account, or any other electronic account, including Plaintiff's children,
- z. Entering, operating, or exercising control over the 2004 Dodge Ram truck in the possession of A.J.S.,
- aa. Tracking or monitoring personal property or a motor vehicle in the possession of a Plaintiff or her minor children, without Plaintiff's effective consent, including by using a tracking application on a personal electronic device in the possession of that Plaintiff or her minor children or using a tracking device,
- bb. Tracking or monitoring personal property or a motor vehicle in the possession of a Plaintiff or her minor children, without Plaintiff's effective consent, including by physically following Plaintiff or minor children or causing another to physically follow Plaintiff or her minor children,
- cc. Disturbing the peace of Plaintiff or any member of her family or households,
- dd. Hiding or secreting Plaintiff's children from Plaintiff,
- ee. Making disparaging remarks regarding Plaintiff or any member of her family or households,

- ff. spending any monies received for the benefit of Plaintiff's children from Social Security Administration,
- gg. spending any monies received from GoFundMe, or its registered agent, Cogency Global, Inc., for the benefit of the children from a fundraiser organized by Misty Dawn Runyon of Spring, Texas for Robert Sobel as listed on the website at <https://www.gofundme.com/f/robert-sobel>,
- hh. removing Plaintiff's children beyond Houston, Harris County, Texas, acting directly or in concert with others without Plaintiff's written consent,
- ii. Doing any act that is intended to result in physical harm, bodily injury, assault, or sexual assault,
- jj. doing any act that is a threat that reasonably places Plaintiff or any member of her family in fear of imminent physical harm, bodily injury, assault, or sexual assault,
- kk. communicating a threat through any person to Plaintiff or any member of her family,
- ll. communicating in any manner with Plaintiff or any member of her family except through attorneys,
- mm. engaging in conduct directed specifically toward Plaintiff or any member of her family that is reasonably likely to harass, annoy, alarm, abuse, torment, or embarrass Plaintiff or any member of her family,
- nn. going to or near the residence or place of employment or business of Plaintiff or any member of her family, or the schools of Plaintiff's minor children,
- oo. going to or near, or within one thousand feet of, any location where Plaintiff or any member of her family is/are known by Defendants to be and further prohibited from remaining within one thousand feet after Defendants become aware of Plaintiff or any member of her family's presence.
- pp. going to or near, or within one thousand feet of 22202 Laurel Pine Cir., Kingwood, TX 77339,
- qq. going to or near, or within one thousand feet of 5939 Dumfries Dr., Houston, Texas 77096,
- rr. going to or near, or within one thousand feet of 5850 San Felipe St., Houston, Texas 77057,

- ss. harming, threatening, or interfering with the care, custody, or control of a pet, companion animal, or assistance animal, as defined by section 121.002 of the Texas Human Resources Code, that is possessed by or in the actual or constructive care of Plaintiff or any member of her family,
- tt. transferring, encumbering, or otherwise disposing of property owned or leased by Plaintiff or Mr. Sobel who is deceased,
- uu. canceling, altering, failing to renew or pay premiums on, or in any manner affecting the level of coverage that existed at the time this suit was filed.

Request for Temporary Orders and Injunction

76. Plaintiff requests the Court, after notice and hearing, to dispense with the issuance of a bond, to make temporary orders and issue any appropriate temporary injunctions for the preservation of property and protection of Plaintiff, and for the safety and welfare of Plaintiff's children as deemed necessary and equitable. Plaintiff requests that the Court enters orders:

- a. for the appointment of a Special Master to investigate alleged crimes, conspiracies and general failures of JUSTICE impacting Plaintiff and her minor children, and the potential professional status of Defendants,
- b. requiring the Defendants to provide a full accounting of and disgorgement of all monies received for the benefit of Plaintiff's children,
- c. ordering Defendants to provide a sworn inventory and appraisal of all the property owned or claimed by the parties, including property belonging to the estate of Mr. Sobel which was removed from his former law offices by certain Defendants,
- d. ordering Defendants to execute all necessary releases required by Plaintiff to obtain any discovery allowed by the Texas Rules of Civil Procedure,
- e. ordering Defendants to execute all necessary releases pursuant to the Health Insurance Portability and Accountability Act (HIPAA) and 45 C.F.R. section 164.508 to permit Plaintiff to obtain health-care information regarding Plaintiff's children, including the names and addresses for any healthcare providers seen by the children during the period of time they were not in her possession, and
- f. ordering a pretrial conference to simplify the issues in this case and determine the stipulations of the parties and for any other matters the Court deems appropriate.

77. Plaintiff requests the Court, after notice and hearing, to dispense with the issuance of a bond, to make temporary orders and issue any appropriate temporary injunctions for the preservation of property and protection of Plaintiff, and for the safety and welfare of Plaintiff's children as deemed necessary and equitable. Plaintiff requests that the Court enjoin Defendants from the following:

- a. asserting any legal privileges as to confidentiality to law enforcement, civil discovery, or other investigations,
- b. asserting any legal privileges as to confidentiality or avoiding efforts to obtain testimony regarding Plaintiff's allegations,
- c. objecting to Plaintiff's requests for discovery and inspection,
- d. Intentionally communicating with Plaintiff or her minor children in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging, by use of vulgar, profane, obscene, or indecent language or in a coarse or offensive manner, with intent to annoy or alarm Plaintiff,
- e. Threatening Plaintiff in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging, to take unlawful action against any person, intending by this action to annoy or alarm Plaintiff,
- f. Placing a telephone call, anonymously, at any unreasonable hour, in an offensive and repetitious manner, or without a legitimate purpose of communication with the intent to annoy or alarm Plaintiff,
- g. Intentionally, knowingly, or recklessly causing bodily injury to Plaintiff or her children,
- h. Threatening Plaintiff or her children with imminent bodily injury,
- i. Intentionally, knowingly, or recklessly destroying, removing, concealing, encumbering, transferring, or otherwise harming or reducing the value of the property of Plaintiff or her children with intent to obstruct the rights of Plaintiff and/or her children or the authority of the Court,
- j. Intentionally falsifying a writing or record, including an electronic record, relating to the property of Plaintiff, her children, or an estate of the parties,
- k. Intentionally misrepresenting or refusing to disclose to Plaintiff or to the Court, on proper request, the existence, amount, or location of any tangible or intellectual property of Plaintiff, her children, or an estate of the parties, including electronically stored or recorded information,

- l. Intentionally or knowingly damaging or destroying the tangible or intellectual property of Plaintiff, her children, or an estate of the parties, including electronically stored or recorded information,
- m. Intentionally or knowingly tampering with the tangible or intellectual property of Plaintiff, her children, or an estate of the parties, including electronically stored or recorded information, and causing pecuniary loss or substantial inconvenience to Plaintiff,
- n. Selling, transferring, assigning, mortgaging, encumbering, or in any other manner alienating any of the property of Plaintiff, her children, or an estate of the parties, whether personal property, real property, or intellectual property, except as specifically authorized by order of this Court,
- o. Withdrawing, transferring, assigning, encumbering, selling, or in any other manner alienating any funds or assets held in any brokerage account, mutual fund account, or investment account of Plaintiff, her children, or an estate of the parties, regardless of whether the funds or assets are community or separate property and whether the accounts are self-managed or managed by a third party, except as specifically authorized by order of this Court,
- p. Withdrawing or borrowing money in any manner for any purpose from any retirement, profit-sharing, pension, death, or other employee benefit plan, employee savings plan, individual retirement account, or Keogh account of Plaintiff, her children, or an estate of the parties, except as specifically authorized by order of this Court,
- q. Entering any safe-deposit box in the name of or subject to the control of Plaintiff, her children, or an estate of the parties, whether individually or jointly with others,
- r. Canceling, altering, failing to renew or pay premiums on, or in any manner affecting the level of coverage that existed at the time this suit was filed of, any life, casualty, automobile, or health insurance policy insuring the parties' property or persons, including Plaintiff's children,
- s. Opening or diverting mail or e-mail or any other electronic communication addressed to Plaintiff, her children, or another party,
- t. Signing or endorsing Plaintiff's name on any negotiable instrument, check, or draft, including a tax refund, insurance payment, and dividend, or attempting to negotiate any negotiable instrument payable to Plaintiff without the personal signature of Plaintiff,
- u. Destroying, disposing of or altering any financial records of the parties, including but not limited to a canceled check, deposit slip, and other records from a financial institution, a record of credit purchases or cash advances, a tax return, and a financial statement,

- v. Destroying, disposing of, or altering any e-mail, text message, video message, or chat message or other electronic data or electronically stored information relevant to the subject matter of this case, whether stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium,
- w. Modifying, changing, or altering the native format or metadata of any electronic data or electronically stored information relevant to the subject matter of this case, whether stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium,
- x. Deleting any data or content from any social network profile used or created by Plaintiff, her children, or another party,
- y. Using any password or personal identification number to gain access to another party's e-mail account, bank account, social media account, or any other electronic account, including Plaintiff's children,
- z. Entering, operating, or exercising control over the 2004 Dodge Ram truck in the possession of A.J.S.,
- aa. Tracking or monitoring personal property or a motor vehicle in the possession of a Plaintiff or her minor children, without Plaintiff's effective consent, including by using a tracking application on a personal electronic device in the possession of that Plaintiff or her minor children or using a tracking device,
- bb. Tracking or monitoring personal property or a motor vehicle in the possession of a Plaintiff or her minor children, without Plaintiff's effective consent, including by physically following Plaintiff or minor children or causing another to physically follow Plaintiff or her minor children,
- cc. Disturbing the peace of Plaintiff or any member of her family or households,
- dd. Hiding or secreting Plaintiff's children from Plaintiff,
- ee. Making disparaging remarks regarding Plaintiff or any member of her family or households,
- ff. Spending any monies received for the benefit of Plaintiff's children from Social Security Administration,
- gg. spending any monies received from GoFundMe, or its registered agent, Cogency Global, Inc., for the benefit of the children from a fundraiser organized by Misty Dawn Runyon of Spring, Texas for Robert Sobel as listed on the website at <https://www.gofundme.com/f/robert-sobel>,
- hh. removing Plaintiff's children beyond Houston, Harris County, Texas, acting directly or in concert with others without Plaintiff's written consent,

- ii. Doing any act that is intended to result in physical harm, bodily injury, assault, or sexual assault,
- jj. doing any act that is a threat that reasonably places Plaintiff or any member of her family in fear of imminent physical harm, bodily injury, assault, or sexual assault,
- kk. communicating a threat through any person to Plaintiff or any member of her family,
- ll. communicating in any manner with Plaintiff or any member of her family except through attorneys,
- mm. engaging in conduct directed specifically toward Plaintiff or any member of her family that is reasonably likely to harass, annoy, alarm, abuse, torment, or embarrass Plaintiff or any member of her family,
- nn. going to or near the residence or place of employment or business of Plaintiff or any member of her family, or the schools of Plaintiff's minor children,
- oo. going to or near, or within one thousand feet of, any location where Plaintiff or any member of her family is/are known by Defendants to be and further prohibited from remaining within one thousand feet after Defendants become aware of Plaintiff or any member of her family's presence,
- pp. going to or near, or within one thousand feet of 22202 Laurel Pine Cir., Kingwood, TX 77339,
- qq. going to or near, or within one thousand feet of 5939 Dumfries Dr., Houston, Texas 77096,
- rr. going to or near, or within one thousand feet of 5850 San Felipe St., Houston, Texas 77057,
- ss. harming, threatening, or interfering with the care, custody, or control of a pet, companion animal, or assistance animal, as defined by section 121.002 of the Texas Human Resources Code, that is possessed by or in the actual or constructive care of Plaintiff or any member of her family,
- tt. transferring, encumbering, or otherwise disposing of property owned or leased by Plaintiff or Mr. Sobel who is deceased,
- uu. canceling, altering, failing to renew or pay premiums on, or in any manner affecting the level of coverage that existed at the time this suit was filed.

Request for Permanent Injunction

78. Plaintiff requests the Court, after trial on the merits, that the previous requested temporary injunctions be made permanent injunctions and prohibitions against Defendants, their attorneys, agents and employees:

- a. spending any monies received for the benefit of Plaintiff's children from Social Security Administration,
- b. spending any monies received from GoFundMe, or its registered agent, Cogency Global, Inc., for the benefit of the children from a fundraiser organized by Misty Dawn Runyon of Spring, Texas for Robert Sobel as listed on the website at <https://www.gofundme.com/f/robert-sobel>
- c. removing Plaintiff's children beyond Houston, Harris County, Texas, acting directly or in concert with others.
- d. Doing any act that is intended to result in physical harm, bodily injury, assault, or sexual assault,
- e. doing any act that is a threat that reasonably places Plaintiff or any member of her family in fear of imminent physical harm, bodily injury, assault, or sexual assault,
- f. communicating a threat through any person to Plaintiff or any member of her family,
- g. from communicating in any manner with Plaintiff or any member of her family except through Plaintiff's attorneys,
- h. engaging in conduct directed specifically toward Plaintiff or any member of her family that is reasonably likely to harass, annoy, alarm, abuse, torment, or embarrass Plaintiff or any member of her family,
- i. going to or near the residence or place of employment or business of Plaintiff or any member of her family, or the schools of Plaintiff's minor children,
- j. going to or near, or within one thousand feet of, any location where Plaintiff or any member of her family is/are known by Defendants to be and further prohibited from remaining within one thousand feet after Defendants become aware of Plaintiff or any member of her family's presence.
- k. going to or near, or within one thousand feet of 22202 Laurel Pine Cir., Kingwood, TX 77339,
- l. going to or near, or within one thousand feet of 5939 Dumfries Dr., Houston, Texas 77096,

- m. going to or near, or within one thousand feet of 5850 San Felipe St., Houston, Texas 77057,
- n. harming, threatening, or interfering with the care, custody, or control of a pet, companion animal, or assistance animal, as defined by section 121.002 of the Texas Human Resources Code, that is possessed by or in the actual or constructive care of Plaintiff or any member of her family,
- o. transferring, encumbering, or otherwise disposing of property owned or leased by Plaintiff or Mr. Sobel who is deceased,
- p. disturbing the peace of Plaintiff or any member of her family, and
- q. making disparaging remarks regarding Plaintiff or any member of her family.

Conditions Precedent

79. Plaintiff has satisfied all the conditions precedent to this lawsuit. Nothing Plaintiff did caused or contributed to the occurrences made the basis of this lawsuit.

Interest

80. Plaintiff seeks pre-judgment and post-judgment interest on the past damages found by the trier of fact.

Reservation of Rights

81. Plaintiff reserves the right to prove the amount of damages at trial. Plaintiff also reserves the right to amend this Petition to add additional counts as further discovery is completed and her investigation continues.

82. Each claim contained within this pleading is made pursuant to Texas Rule of Civil Procedure Rule 48, which entitles Plaintiff to set forth two or more statements of a claim alternatively or hypothetically, either in one count or in separate counts, and which provides that, when two or more statements are made in the alternative and one of them if made independently would be sufficient, the pleading is not made insufficient by the insufficiency of one or more of the alternative statements. Plaintiff also exercises her right under Texas Rule of Civil Procedure 48 to state as many separate claims or defenses as she has, regardless of consistency and whether based upon legal or equitable grounds or both.

Demand for Jury Trial

83. A demand for a jury trial is made and the necessary fee has been tendered.

**Notice of Intent to Use Documents Produced by a Defendant in Response to Plaintiff's
Written Discovery Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure**

84. Plaintiff hereby serves notice that Plaintiff intends to use any and all documents produced by the Defendant in response to written discovery propounded to the Defendant. As such, the produced documents are self-authenticated pursuant to TRCP, Rule 193.7.

Initial Disclosures

85. Defendants must disclose within 30 days after the filing of the first answer or general appearance, unless a different time is set by the parties' agreement or court order, the material and information in Rule 194.2(b) of the Texas Rules of Civil Procedure.

Attorney Fees

86. It was necessary for Plaintiff to secure the services of attorneys, to protect the rights of Plaintiff, A.J.S. and A.L.S. Defendants should be ordered to pay reasonable attorney's fees and expenses, and a judgment should be rendered in favor of Plaintiff's attorneys and against Defendants and be ordered paid directly to her attorneys, who may enforce the judgment in their own name. Defendants should be ordered to pay all other costs of this proceeding. Plaintiff, Plaintiff, requests post-judgment interest as allowed by law because:

- a. Plaintiff is entitled to recover reasonable and necessary attorney fees under chapter 42 of the Texas Family Code,
- b. Plaintiff is further entitled to recover reasonable and necessary attorney fees under Texas Estates Code section 351.003 because this is a suit to recover proceeds from an estate,
- c. Plaintiff is further entitled to recover reasonable attorney fees under Texas Property Code, and
- d. Plaintiff is further entitled to recover reasonable attorney fees under the Texas Theft Liability Act.

Conclusion and Prayer

87. **In summary, the events that have transpired necessitating this suit are chilling. Based upon the actions of the Defendants, one would have to fear that allowing a child to spend any length of time with a person of even modest means, could conceivably open a parent up to similar galling actions taken by that person to usurp and steal custody and control of their child or children via perjurious and unlawful court filings. In the instant case's circumstances, this occurred after just 14 days (again, without Plaintiff's knowledge or consent). Likewise, the estate frauds and property crimes which have been committed by certain Defendants are absolutely staggering. The Court cannot allow such gross miscarriages of justice to occur in the future, and it is incumbent upon the Court to use its INHERENT POWER to do the right thing and to grant Plaintiff's requests for relief.**

88. Plaintiff prays that citation and notice issue as required by law and that the Court immediately grant a temporary restraining order restraining Defendants in conformity with the allegations of this petition, from the acts set forth above, and Plaintiff prays that, after notice and hearing, this temporary restraining order be made a temporary injunction.

89. Plaintiff further prays that the Court:

- a. refer the offending actors for criminal prosecution,
- b. refer the offending actors for disciplinary proceedings,
- c. appoint a Special Master and tax as costs against Defendants,
- d. set this matter for a jury trial and issue a scheduling order for appropriate pretrial deadlines,
- e. enter permanent injunctions enjoining Defendants, in conformity with the allegations of this petition, from the acts set forth above.

90. Plaintiff prays for judgment against Defendants, jointly and severally, for the damages set forth above and for prejudgment interest and post-judgment interest as provided by law, including for attorney's fees, expenses, costs, and interest as requested above. Plaintiff prays for return of the converted property, recovery of all relief requested and for all general, special and equitable relief to which this Court may deem Plaintiff entitled.

Respectfully Submitted,



JENNIFER A. GRANT
Paralegal SBN: 24104811
JUST Jen Media & Consulting
5850 San Felipe St., Suite 500
Houston, Texas 77057
Tel: (713) 333-9372
jennifer@quantumlegalsupport.com
Plaintiff *Pro Se*

VERIFICATION

My name is Jennifer A. Grant. My date of birth is December 22, 1977, and my office is located at 5850 San Felipe St., Suite 500, Houston, Texas 77057. I declare under penalty of perjury that I have reviewed each statement above and have personal knowledge of the facts stated both herein and in my contemporaneously and previously filed affidavits. The records and documents which are attached as exhibits are all true and correct copies and/or accurately depict the subject matter described.

Executed this day, March 2, 2025, in Houston, Harris County, Texas, United States.



JENNIFER A. GRANT
Paralegal SBN: 24104811
Plaintiff *Pro Se*

Unofficial Copy Office of Marilyn Burges District Clerk

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 98160091

Filing Code Description: Amended Filing

Filing Description: First Amended Original Petition for Damages Due to Defendants??? Interference with Plaintiff???s Possessory Interest in Children, Property Damage, Conversion, Harassment, and Invasions of Privacy, Request for Court to Exercise Its Inherent Power to Refer for Criminal Prosecution, Refer for Disciplinary Proceedings, Request for Temporary Restraining Order, Request for Temporary and Permanent Injunctions, and Request for Disclosures

Status as of 3/6/2025 3:26 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Boe Bowen	24088784	BowenLawFirm@bowenlf.com	3/6/2025 3:03:09 PM	SENT
Jennifer AGrant		jennifer@quantumlegalsupport.com	3/6/2025 3:03:09 PM	SENT
Samantha Harris	24123177	sharris@thelawofficeofsamanthajharris.com	3/6/2025 3:03:09 PM	SENT
Reba Bedford		medicpetitto@gmail.com	3/6/2025 3:03:09 PM	SENT
Kristopher DamonRunyon		kristopher.runyon@yahoo.com	3/6/2025 3:03:09 PM	SENT
Misty DawnRunyon		mdrunyon@live.com	3/6/2025 3:03:09 PM	SENT
Randee LynnSobel		randees@gmail.com	3/6/2025 3:03:09 PM	SENT
Reba Bedford		medicbedford@gmail.com	3/6/2025 3:03:09 PM	SENT
Kristopher DamonRunyon		kristopher.runyon@yahoo.com	3/6/2025 3:03:09 PM	SENT
Belinda Puntanen		belindapuntanen@gmail.com	3/6/2025 3:03:09 PM	SENT
Misty DawnRunyon		mdrunyon@live.com	3/6/2025 3:03:09 PM	SENT
Madeline DianneRunyon		madelinedianne97@gmail.com	3/6/2025 3:03:09 PM	SENT
Robyn EliseSegal		legalsegal84@gmail.com	3/6/2025 3:03:09 PM	SENT
Brenda TaftEdwards		bktedwards@gmail.com	3/6/2025 3:03:09 PM	SENT
Robert SSobel		sobelfamilyestate@gmail.com	3/6/2025 3:03:09 PM	SENT



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this March 11, 2025

Certified Document Number: 119329028 Total Pages: 35

Marilyn Burgess

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

Unofficial Copy Office of Marilyn Burgess District Clerk

In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

CAUSE NO. 2025-13614

JENNIFER A. GRANT, INDIVIDUALLY,
AND AS NEXT FRIEND OF
A.J.S. and A.L.S., MINORS

Plaintiff

VS.

MISTY DAWN RUNYON,
KRISTOPHER DAMON RUNYON,
MICHAEL AUSTIN KROCKER,
BOE LYNN BOWEN, Individually and
in his official capacity for,
THE BOWEN LAW FIRM, PLLC,
DONNA RENEE WITCHER,
ENCORE LEGAL PROCESS, INC.,
RANDEE LYNN SOBEL,
REBA BEDFORD (AKA REBA PETITTO),
BELINDA PUNTANEN (Individually
and as next friend of Z.R.M., Minor),
SAMANTHA JAYE HARRIS,
THE LAW OFFICE OF
SAMANTHA J. HARRIS, PLLC,
BRENDA TAFT EDWARDS,
ROBYN ELISE SEGAL,
MADELINE DIANNE RUNYON,
SAVANNAH SKY RUNYON,
SIERRA HOPE STEVENS-DREWS,
ROBERT S. SOBEL (DECEASED),

DEFENDANTS

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

151ST JUDICIAL DISTRICT

EXHIBIT 1

PLAINTIFF'S AFFIDAVIT IN SUPPORT OF REQUESTED RELIEF

(UNSWORN DECLARATION MADE PURSUANT TO TEXAS CIVIL PRACTICE AND REMEDIES CODE CHAPTER 132)

My name is JENNIFER A. GRANT. My date of birth is December 22, 1977, and my work address is 5850 San Felipe St., Suite 500, Houston, Texas 77057, in United States of America. I have been a legal paraprofessional for twenty years having managed multiple law firms that employed multiple attorneys where I managed multiple subordinate legal assistants and paralegal staff members. I have taken approximately 300 documented hours of continuing legal education since 2018 and have spent thousands of hours in courtrooms and mediations over the years personally assisting my supervising attorneys.

My divorce from Robert Sobel (herein, “Robert”),¹ an attorney whose practice I managed for 11 years, was highly contested and involved outrageous facts that read like a cheap dime store novel – such as Robert physically abusing me, he and his former employee, Misty Dawn Runyon (herein, “Misty” or “Ms. Runyon”), attempting to blame me for their botching of a bankruptcy client’s case resulting in Robert’s later sanction by a federal judge,² and Robert soliciting a gentleman named Don Anthony Allen (herein, “Mr. Allen”) for opiates and my murder.³

Our divorce ultimately resulted in multiple lawsuits that included Robert’s own divorce lawyer suing him,⁴ a female employee who Robert had cheated on me with filing for divorce from Mr. Allen (they reconciled and had children),⁵ another female employee quitting, Robert suing me and my divorce lawyer in a different civil court,⁶ CPS investigating Ms. Runyon for reported Vicodin abuse,⁷ Ms. Runyon having to defend a resulting custody case over her now adult daughter, Sierra Stevens-Drews,⁸ and Robert filing a (dismissed as unfounded) professional grievance against both me and my ex-fiancé, attorney Benjamin Sanchez.

Robert and I married on January 18, 2007. Together we had two children. We separated in February of 2016 and were divorced on March 9, 2018, after two hotly contested trials and dozens of hearings over the course of the two years’ very high conflict litigation described. Midway into our first trial, on May 9, 2017, after Robert had rested his case, while I was putting on my case in chief, an agreement for final orders was reached for us to share 50/50 custody of our children (after a recording revealed during a testimony break of Robert and Misty planning an illicit drug transaction with a woman who I now know to be Cami Clare Hernandez).

Later, Robert sought to set aside our agreement by filing a motion alleging his agreement was made under coercion and duress (*i.e.*, threat of criminal prosecution). Then, at a contested hearing on his motion, one of his employee witnesses and the wife of Mr. Allen, Kaitlyn Wilson (herein, “Kaitlyn”), recanted her testimony given on May 9, 2017, after admonishment by the court’s former presiding judge and one of the examining attorneys about the consequences of committing aggravated perjury. Kaitlyn subsequently testified to having personal knowledge of Robert obtaining illicit prescriptions from third parties.⁹

Solely upon advice of counsel, I agreed to set aside our final settlement agreement pending a new trial and Interim Temporary Orders that incorporated our previously agreed terms for final 50/50 custody were entered by the 245th Judicial District Court on July 14, 2017. Months later, after another trial on the merits, in our Final Decree of Divorce, Hon. Roy Moore, the former presiding judge of the 245th Judicial District Court, appointed me and Robert as Joint Managing Conservators for our children, but Robert was awarded the exclusive right to establish our children’s domicile.

¹ *Sobel vs. Sobel*; Cause No. 2016-22196; Harris DC 245 (sealed case)

² *In re: Saucedo*, No. 16-30441, S.D. Tex., Houston

³ Jointly reported to Houston Police Department in 2017; Incident No. 1352884-17

⁴ *Tracy vs. Sobel*; Cause No. 2016-22196; Cause No. 2016-22196A Harris DC 245

⁵ *Wilson vs. Allen*; Cause No. 2017-67292, Harris DC 310

⁶ *Sobel vs. Sobel*, et al; 2017-49224; Harris DC 113

⁷ [Misty Runyon] *Sworn Affidavit* (June 7, 2017) to be presented at a hearing.

⁸ *Cooper vs. Runyon*; 2017-82791; Harris DC 311

⁹ Reporter’s Record (June 22, 2017); Cause No. 2016-22196; Harris DC 245 (sealed case)

In hindsight, particularly given the state of the home and events that followed described herein, I deeply regret allowing the settlement to have been set aside because I believe that Robert, an opiate addict who twice nearly lost his own law license for heroin addiction, had likely relapsed again and appears to have been abusing drugs, including prescription opiates and marijuana, until his untimely death at home on January 5, 2023. My belief is formed from his known history, the state of the home, illicit drugs and drug paraphernalia found in his possessions (including THC vape oil pens which, to my knowledge, did not exist at the time of our divorce), and the apparent state of his financial and business affairs. Regardless of whether he had relapsed, it is very apparent that critical information about my children and which impacted my children had been concealed from me for quite a long time. Before he died, Robert was admitted to the hospital in renal and heart failure on October 1, 2022.

A few days after Robert was admitted into the hospital, my daughter contacted me for help in obtaining new copies of her birth certificate and social security card because hers were unobtainable due to them being in Robert's law offices he was reportedly locked out of for unpaid rent. When I asked what she needed them for, she told me they were necessary for her to obtain her hardship license and that her dad's physician would be providing supporting documents evidencing its necessity. I obliged her and spent a full day at each agency in our efforts for same. During that time, I was very alarmed to learn from her that one of his legal clients had shown up at their house on three separate occasions looking for Robert, so I began to investigate who needed to be contacted and advised of Robert's circumstances.

My investigation revealed that he missed several deadlines and hearings. I knew this highly increased the likelihood of more clients coming to the house which terrified me given Robert's areas of law practice—primarily in criminal, family, and bankruptcy law. Having also learned from my daughter that his last employee quit for unpaid wages after dumping work equipment and files on their front porch, coupled with comments she made about needing to contact certain clients and courts, it was apparent to me that most of Robert's responsibilities as the adult in the household and as the attorney for his clients were now falling upon my ill-equipped 15-year-old daughter instead.

Although our divorce was extremely acrimonious, I was harassed by him for years afterward and I physically feared Robert, I believed the circumstances to be critical and required appropriate intervention since our children were being negatively impacted. Toward that end, I started touring properties nearby to move into and I filed a petition in district court so the Court and the State Bar of Texas would assume jurisdiction of his law practice.¹⁰ Robert was released from the hospital on or about October 31, 2022, but died at home on January 5, 2023.

While Robert was hospitalized, important facts were concealed by certain defendants in a misguided and/or malicious effort to prevent me from intervening or assisting and protecting my children and their estates. Because of their actions, Robert's legal clients suffered as well. Some of those clients and Robert's creditors have filed claims to recover for alleged losses. Based upon the totality of the circumstances and information which has come to light since then, I have serious and well-founded concerns which point to a likelihood that Robert and my children were financially taken advantage of by certain defendants in the instant proceeding. I have expressed

¹⁰ *Matter of the Law Practice of Robert S. Sobel*; Cause No. 2022-68473, Harris DC 152

some of my concerns to Mr. Dean Schaffer and Ms. Claire Reynolds, attorneys employed by the State Bar of Texas, which include my belief that funds may have been misappropriated (including funds from his own inheritance), and that the entirety of Robert's law practice has disappeared. Incredibly, since Robert's hospitalization, I have been subjected to the following crimes and tortious acts with Defendants being the common denominator:

- wage theft by attorney Michael Tracton (he will be named in a separate supplemental lawsuit after severance, but at least 2 defendants herein were employed by Mr. Tracton in or about 2022—Robyn Segal during my tenure),¹¹
- personal and professional defamation by most of the named Defendants and individuals identified herein,
- civil and criminal conspiracies to interfere with my exclusive right to custody of my children,^{12,13,14}
- numerous false reports to agencies,
- severe parental alienation,
- mail theft,¹⁵
- assault/battery by Kristopher Runyon,
- personal residence broken into (twice),
- property theft and/or conversion,
- theft and misappropriation of funds for the exclusive benefit and support of my children by Misty Runyon,
- residential squatting and abuse of legal process by Belinda Puntanen,¹⁶
- theft of services by Belinda Puntanen,¹⁷
- four baseless lawsuits requiring my defense via attorneys hired,
- computer hacking,¹⁸

¹¹ Reported to Sugar Land Police Department in or about December 2022; Incident No. 22-7544

¹² *Sobel vs. Sobel*; Cause No. 2016-22196; Harris DC 245 (sealed case). See Individual Affidavit for Probable Cause (Jan. 6, 2025).

¹³ *Ex Parte Sobel Children*; Cause No. 2016-22196B; Harris DC 245

¹⁴ *Ex Parte Sobel Children*; Cause No. 2016-22196C; Harris DC 245

¹⁵ Reported to Federal Postal Inspectors; Service Request Numbers: 51637560 and 51637720

¹⁶ *Grant vs. Puntanen et al*; Case No. 1233110, Harris CCL 2; See Affidavit of Criminal Complaint (May 20, 2024)

¹⁷ *Id.* ft. 16

¹⁸ Photos and other evidence will be presented at a hearing.

- cyberstalking,
- harassment,
- violations of privacy,
- dissemination of confidential materials from my divorce proceedings,
- false police reports filed by Misty Runyon,
- false police reports filed by Kristopher Runyon,
- false police reports filed by Belinda Puntanen,
- Interference by Ms. Runyon in the critical and necessary medical treatment of my minor daughter by disseminating my confidential divorce decree to mislead medical providers,
- Personal and professional defamation of my life partner who is a physician, and
- Personal defamation of my oldest son, specifically that he was convicted of murder. (My son has never been charged with murder, manslaughter or anything of that nature).

All these events and resulting circumstances have caused me extreme emotional distress and my time was necessarily spent on matters to defend myself (rather than my planned for attendance to law school or my usual employment) which has distracted and harmed me to such a degree that I have been unable to help others and exponentially compounded my emotional distress more.¹⁹

At all times since Robert's passing, I have had the sole right to the possession of our children. However, defendants have interfered with, and/or conspired to interfere with, my right to custody of my children since October 2022, likely well before then. Nonetheless, (exclusive of all the countless text and written demands) my agents or I attempted to recover my children from Defendants on **February 12, 2023, March 1, 2023, March 3, 2023, April 12, 2023, April 14, 2023, June 6, 2023, June 28, 2023, July 4, 2023, August 26, 2023, January 3, 2024, February 8, 2024, July 19, 2024, September 17, 2024, September 27, 2024, October 1, 2024, November 12, 2024, November 13, 2024, November 25, 2024, November 26, 2024, November 27, 2024, December 3, 2024, December 5, 2024.**²⁰

On August 26, 2023, while attempting to recover my children from Misty and Kristopher Runyon, I was assaulted by Kristopher Runyon.²¹ Then, on September 17, 2023, I discovered that the day before, on September 16, 2023, me and my children's home was broken into and a bunch of property belonging to my children and to the Estate of Robert Sobel removed without

¹⁹ <https://www.facebook.com/share/p/1BcHBTm2vM/>

²⁰ *Id.* ft. 12, 13 and 14

²¹ Reported to Precinct 4 Harris County Constable; No. 2412-00954

authority.²² Prior to their break-in, I discovered that they, or an agent acting on their behalf, had stolen my mail from my mailbox, which included mail I would have received from the Social Security Administration to advise me about an appointment that was made (and had) to change the payor of my children's Social Security Survivor Benefits. Upon discovering the mail theft, I reported it to federal postal inspectors in or around March of 2023 and installed a lockable mailbox at our home.²³ Nonetheless, in the course of the break-in, thousands of dollars in physical damage were caused to the premises. Attached as **Exhibit A** are photos that I took on September 17, 2024, to document some of the damage caused during the break in.

These events necessitated my filing an *Application for Protective Order* against Misty and Kristopher Runyon.^{24,25} However, before I was able to have the final hearing for those applications, my mother was admitted into the hospital. On December 1, 2023, I had to pass the final hearing because she was on her deathbed. She died on December 6, 2023, having never seen my children again since their visit to me in the hospital in February 2023. I was stunned to later discover my children were told that I said mother had died on December 1st "to get out of court," which leads me to believe either the former attorney for the Runyons, Michael Krockner, and/or Misty and Kristopher Runyon told my children this lie.²⁶

Robert's purported will has only been provided to me (dubiously) by Ms. Runyon via court proceedings and a text message. I have been unable to find any electronic artifacts one would expect to support its authenticity, and I have serious doubts as to its validity—particularly since the purported will is nothing like the wills that we had created during my 11 years of tenure with Robert. The purported will is more akin to one of those produced by do-it-yourself will software found in office supply stores next to the tax software and smacks of generic layperson drafting rather than a properly drafted will from a lawyer. Given the totality of all the circumstances, I fervently believe the will to be phony and I communicated with the State Bar of Texas about having a computer expert investigate my concerns in 2023.

Greatly compounding my concerns is the fact that the entirety of Robert's law practice contents have disappeared since Misty moved his things into a storage facility, false allegations have been made by Robert's sister, Randee Sobel (herein, "Randee") and his first wife, Brenda Taft Edwards (herein, "Brenda"), that I "stole" his law practice and I am practicing law without a license. Moreover, an application to probate his purported will was not filed for more than a year and the applicant is Randee. Yet, since the application was filed, Randee has accused me of "doctoring" the very same will that *she* (purportedly) filed *pro se*. Quite interestingly, the application to probate the purported will was filed on January 22, 2024, when Ms. Puntanen was a week late on her first rent payment of me and my children's home (which is undisputedly subject to estate proceedings).

I have very good reason to believe that the probate application which is replete with false and defamatory allegation was fraudulently and unlawfully filed by my former squatter tenant, Belinda Faith Odell Puntanen (herein, "Ms. Puntanen") perhaps in co-conspiracy with Misty,

²² Reported to Houston Police Department; Incident No. 1335817-23

²³ Reported to Federal Postal Inspectors; Service Request Numbers: 51637560 and 51637720

²⁴ *Grant vs. Runyon*; Cause No. 2023-73807; Harris DC 280

²⁵ *Grant vs. Runyon*; Cause No. 2023-73809; Harris DC 280

²⁶ Emails with former court appointed amicus attorney, Angela Stout, to be presented at a hearing.

Kristopher, Samantha Jaye Harris (Robert's former paralegal and junior associate who later appeared as an attorney in pending estate proceedings) (herein, "Ms. Harris"), Amanda Kay Nelson Savoy (Ms. Harris' employee and Misty Runyon's daughter), Misty's sister-in-law, Madeline Dianne Runyon (herein, "Madeline"), who was a witness of the purported will, and Brenda.^{27,28,29,30,31,32,33}

I believe the will to be fraudulent because the original does not appear to exist, because there are no electronic artifacts to substantiate it, because one of the witnesses cannot be located while the other is, coincidentally, Madeline, and because a complaint was filed with the Texas Real Estate Commission on May 22, 2023. The complaint was purportedly filed by Randee, but I believe that it was actually filed by Defendant Reba Bedford (aka Reba Petitto aka Reba Hudson) (herein, "Reba") acting either as her agent and/or co-conspirator of hers and the Runyons based upon email addresses associated with the complaint, background investigations conducted and because Reba is named in the complaint as a witness. Reba is Mr. Runyon's aunt and has had her EMT license suspended for violations of Louisiana statutes.³⁴ Nonetheless, the false complaint stated that me and my children's home "was left to [Randee] and that [she] was probating [her] brother's will and estate." Of course, the purported will makes no mention of this.

Additionally, before I sought to evict Belinda, believing I was assisting her with an unnamed client she claimed to have, I had given her access to probate forms I use for my attorney clients. As stated, the application to probate will contains false and defamatory allegations framed as a factual hearing outcome in now dismissed custody proceedings which Belinda attended with me and my former attorney, Maria L. Schnebly, as a paralegal for my legal team and (which was not attended by Ms. Sobel).

It should be noted that Belinda is a disgraced paralegal with permanent injunctions against her in 6 Texas cases for Unauthorized Practice of Law³⁵ and she was arrested in North Carolina for the same. While preparing for my eviction proceedings against her, I discovered that an attorney obtained a protective order against her, that she filed bankruptcy in 2021 to discharge approximately \$200K in debt including tens of thousands of dollars in unpaid child support. I also uncovered significant evidence of financial and tax frauds she has committed and found nearly twenty cases against her involving prior evictions, breaches of contract, alleged frauds, and that her common law husband, a man named Jeffrey Wayne Wilson, was charged with credit/debit card abuse and stealing more than \$100,000 from a client after posing as a legal consultant.³⁶ Moreover,

²⁷ *In the Estate of Robert Sobel*, Case No. 522,592; Harris Probate No. 2. See Application for Probate of Will and Issuance of Letters Testamentary (January 22, 2024)

²⁸ Emails to be presented at a hearing were already provided to law enforcement, to the Office of the Chief Disciplinary Counsel and to the Unauthorized Practice of Law Committee for investigation.

²⁹ Text messages to be presented at a hearing were already provided to law enforcement, to the Office of the Chief Disciplinary Counsel and to the Unauthorized Practice of Law Committee for investigation.

³⁰ *Grant vs. Puntanen et al*; Case No. 1233110, Harris CCL 2

³¹ *Puntanen vs. Grant et al*, No. 2024-51192, Harris DC 11; Exhibit BB - Gmail - November 2023 - January 2024 Electricity Bill (August 12, 2024)

³² *Puntanen vs. Grant et al*, No. 2024-51192, Harris DC 11; Exhibit D (December 10, 2024)

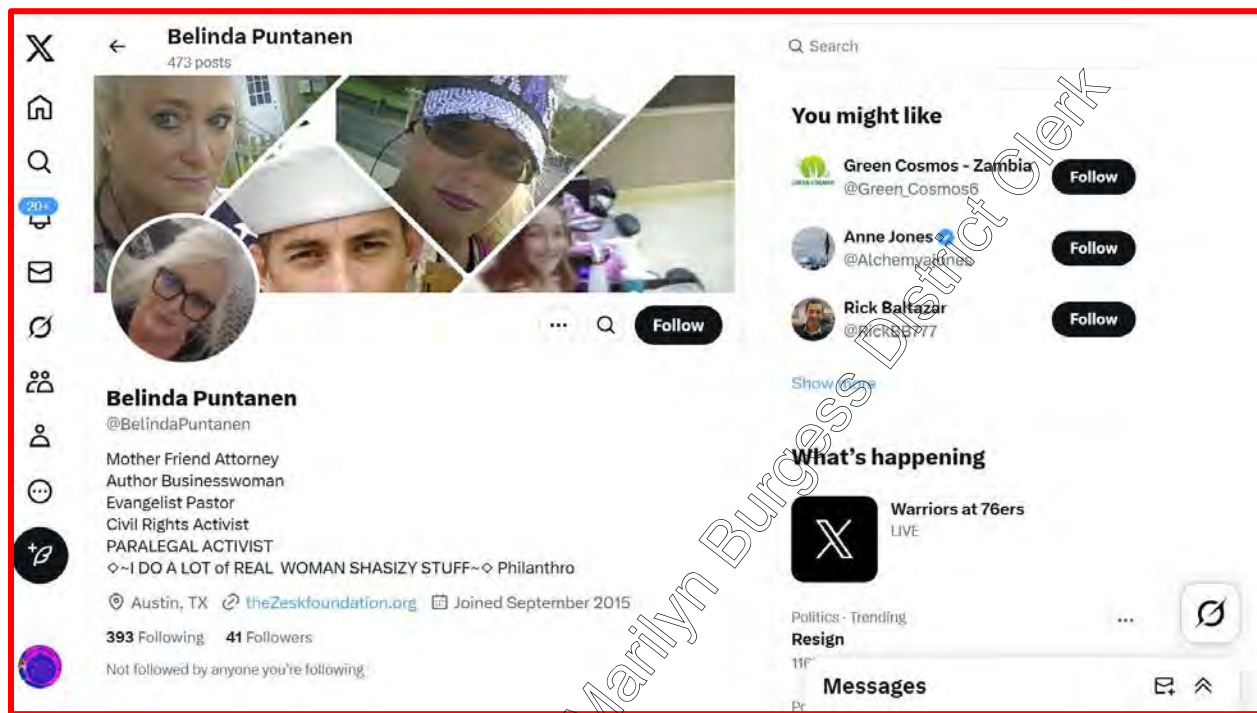
³³ Text messages to be presented at a hearing but have already been provided to law enforcement.

³⁴ <https://ldh.la.gov/assets/oph/ems/EMSCC/211020DisciplinaryDecisions.pdf>

³⁵ See <http://www.txuplc.org/Home/news>

³⁶ See <https://www.click2houston.com/news/2014/03/13/police-man-poses-as-legal-consultant-steals-from-clients/>

while preparing for my eviction proceedings against her, I discovered a social media profile belonging to Belinda identifying herself as “attorney” in her bio.³⁷ If true, **these actions are violations of Texas Penal Code §§ 37.09, 37.10, 38.12 and 38.122.** Below is a screenshot of her profile taken today.



Interestingly, as a purported Interested Party (although she did not pay the required filing fee) within the probate proceedings, **Ms. Puntanen filed her own perjurious affidavit in violation of Texas Penal Code § 37.02.** Randee has not controverted the affidavit filed by Ms. Puntanen, but more interestingly, in multiple emails Randee did not appear to recognize her own attorney, and she has stated to me that she is unrepresented (well after her application to probate will was filed). I have brought all of these unusual coincidences and details to the attention of the Office of the Chief Disciplinary Counsel and the Unauthorized Practice of Law Committee and have maintained frequent contact with them throughout the past two years.

Throughout the course of all the proceedings, I discovered that Misty and Kristopher Runyon have conspired with others to file false professional complaints against me and my life partner, who is a physician. They conspired with Belinda and/or Randee and/or Brenda, to file a now dismissed complaint with the Texas Medical Board against my life partner alleging that he and I are having a sexual relationship, that I am his patient, and that he is providing me with legal opinions regarding the assets of my spouse. That complaint was dismissed by the Texas Medical Board on or about December 1, 2024; however, it necessitated he and I hire attorneys to defend those malicious allegations.

They conspired with Misty’s best friend, Robyn Segal (herein, “Robyn”) and/or with Mr. Tracton (Robyn and Mr. Krockner’s former employer), and with Brenda to file multiple professional

³⁷ See <https://x.com/belindapuntanen>

complaints about me which resulted in a suit being filed against me by the Supreme Court's appointed Unauthorized Practice of Law Committee and me having to hire attorneys Bock Akers and Tiffany Vittur (Kuhl) to defend me.³⁸ The allegations made by Brenda about me were that I had stolen Robert's client files and have been practicing law without a license. Mr. Tracton and/or Robyn filed complaint(s) with the Texas Unauthorized Practice of Law Committee in retaliation of my criminal complaint filed with the Sugar Land Police Department for **Mr. Tracton's wage theft from me in violation of Texas Penal Code § 31.04.**³⁹ Before I discovered that Robyn and Misty were best friends, I had already notified Misty that I would be filing that criminal complaint which leads me to believe their complaint(s) were retaliatory and/or conspiratorial.

I have good cause to believe that several of the Defendants are going to try to avoid service of process because they have either already gone into hiding, and/or are believed to be homeless (Ms. Puntanen), and/or they live in other states (Randee Sobel and Reba Bedford), and/or they reside in distant counties or appear to have multiple residential addresses (Brenda Edwards), and they all have motivation to do so for their criminal conduct. I believe the best method to effect citation for them would be for the Court to order substituted service by public posting and/or via their known email addresses which they have exchanged communications with me from as follows:

BELINDA PUNTANEN: belindapuntanen@gmail.com

REBA BEDFORD aka REBA PETITTO: medicpetitto@gmail.com

RANDEE LYNN SOBEL: randees@gmail.com

BRENDA TAFT EDWARDS: bktedwards@gmail.com

I declare under penalty of perjury that the foregoing is true and correct, within my personal knowledge, or based upon my reasonable belief and understanding from information provided to me by people known to have personal knowledge. I further declare and affirm, under penalty of perjury, that all images herein and attached as an exhibit accurately represent the subjects and subject matter as described.

Executed in Harris County, Texas, United States of America on March 2, 2025.



JENNIFER A. GRANT, Declarant

³⁸ *UPLC vs. Grant*; Cause No. 2022-80860; Harris DC 133 (pending)

³⁹ Reported to Sugar Land Police Department; Incident No. 22-7544

EXHIBIT A

Photos taken on Sept. 17, 2023

Unofficial Copy Office of Marilyn Burgess District Clerk



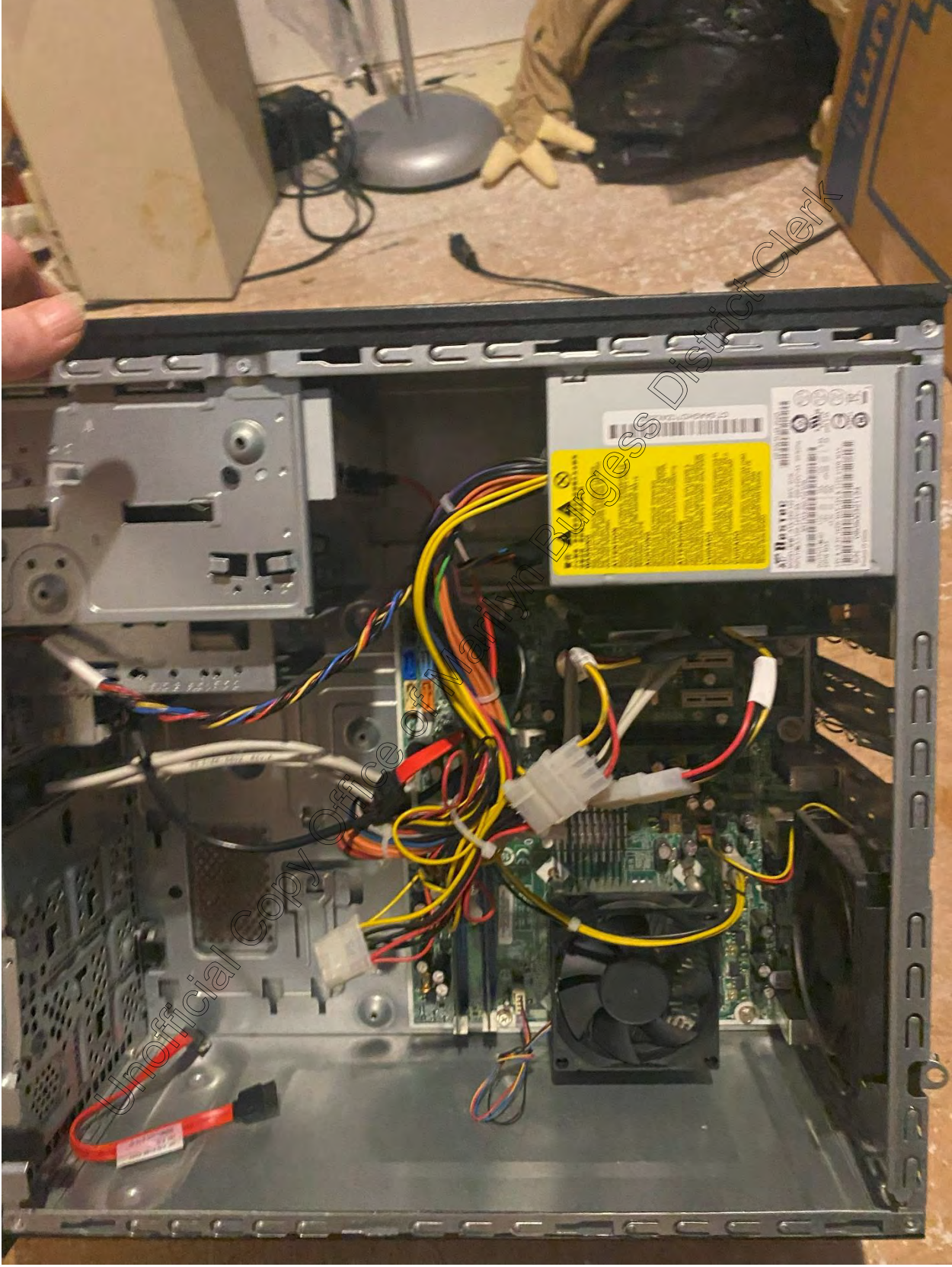


















HOUSTON POLICE DEPARTMENT

Incident No: 1335817-23

Title: INVESTIGATION/BIDREDAEY

Address: 22202 LAUREL PINE CIRE

Date: 9/17/23

Officer's Name: K. COOK

Unit No. 24C22E

Crime Prevention: www.houstonpolice.org

Report Gang Tips: www.stophoustongangs.org

#1329403-23 / CIVIL CALL SUP



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this March 11, 2025

Certified Document Number: 119329029 Total Pages: 20

Marilyn Burgess

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

Unofficial Copy Office of Marilyn Burgess District Clerk

In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

CAUSE NO. 2025-13614

JENNIFER A. GRANT, INDIVIDUALLY, §
AND AS NEXT FRIEND OF §
A.J.S. and A.L.S., MINORS §

Plaintiff §

VS. §

MISTY DAWN RUNYON, §
KRISTOPHER DAMON RUNYON, §
MICHAEL AUSTIN KROCKER, §
BOE LYNN BOWEN, Individually and §
in his official capacity for, §
THE BOWEN LAW FIRM, PLLC, §
DONNA RENEE WITCHER, §
ENCORE LEGAL PROCESS, INC., §
RANDEE LYNN SOBEL, §
REBA BEDFORD (AKA REBA PETITTO), §
BELINDA PUNTANEN (Individually §
and as next friend of Z.R.M., Minor), §
SAMANTHA JAYE HARRIS, §
THE LAW OFFICE OF §
SAMANTHA J. HARRIS, PLLC, §
BRENDA TAFT EDWARDS, §
ROBYN ELISE SEGAL, §
MADELINE DIANNE RUNYON, §
SAVANNAH SKY RUNYON, §
SIERRA HOPE STEVENS-DREWS, §
ROBERT S. SOBEL (DECEASED), §

DEFENDANTS §

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

151ST JUDICIAL DISTRICT

EXHIBIT 2

False Police Reports

INCIDENT DATA

INCIDENT/INVESTIGATION REPORT

Agency Name <i>Harris County Constable's Office Pct. 4</i>		Case# 2303-00095						
ORI <i>TX1014900</i>								
Location of Incident <i>802 CYPRESSWOOD BOUGH, Spring TX 77373</i>		Gang Relat NO	Premise Type <i>Residence/home</i>	Beat/ConstDist 4064, 401	Date / Time Reported <i>03/01/2023 18:27 Wed</i>			
Last Known Secure <i>03/01/2023 18:26 Wed</i>		At Found <i>03/01/2023 18:27 Wed</i>						
#1	Crime Incident(s) <i>Civil Child Custody Dispute</i>	(Com)	Weapon / Tools			Activity		
			Entry	Exit	Security			
#2	Crime Incident	()	Weapon / Tools			Activity		
			Entry	Exit	Security			
#3	Crime Incident	()	Weapon / Tools			Activity		
			Entry	Exit	Security			
MO								
VICTIM	# of Victims <i>1</i>	Type: INDIVIDUAL		Injury:				
	V1	Victim/Business Name (Last, First, Middle) <i>RUNYON, MISTY DAWN</i>	Victim of Crime #	DOB DATES OF Age <i>46</i>	Race <i>W</i>	Sex <i>F</i>		
		Relationship To Offender	Resident Status <i>Resident</i>	Military Branch/Status				
	Home Address <i>802 CYPRESSWOOD BOUGH, Spring, TX 77373-</i>			Email	Home Phone <i>915-834-9538</i>			
	Employer Name/Address			Business Phone	Mobile Phone			
	VYR	Make	Model	Style	Color	Lic/Lis		
				VIN				
OTHERS INVOLVED	CODES: V- Victim (Denote V2, V3) WI = Witness IO = Involved Other RP = Reporting Person (if other than victim)							
	Type: INDIVIDUAL							
		Injury:						
	Code <i>IO</i>	Name (Last, First, Middle) <i>GRANT, JENNIFER AISLINN</i>	Victim of Crime #	DOB DATES OF Age <i>45</i>	Race <i>W</i>	Sex <i>F</i>		
		Relationship To Offender	Resident Status <i>Resident</i>	Military Branch/Status				
	Home Address <i>5939 DUMFRIES DR HOUSTON, TX 77096</i>			Email	Home Phone <i>713-876-5115</i>			
	Employer Name/Address			Business Phone <i>713-321-0397</i>	Mobile Phone			
PROPERTY	Type: INDIVIDUAL							
	Injury:							
	Code <i>PG</i>	Name (Last, First, Middle) <i>RUNYON, KRISTOPHER D</i>	Victim of Crime #	DOB DATES OF Age <i>36</i>	Race <i>W</i>	Sex <i>M</i>		
		Relationship To Offender	Resident Status <i>Resident</i>	Military Branch/Status				
	Home Address <i>802 CYPRESSWOOD BOUGH SPRING, TX 77373</i>			Email	Home Phone <i>915-834-9523</i>			
	Employer Name/Address			Business Phone	Mobile Phone			
	1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown ("OJ" = Recovered for Other Jurisdiction)							
VI #	Code	Status Frm/Tc	Value	OJ	QTY	Property Description	Make/Model	Serial Number
	<i>02</i>	<i>1</i>	<i>\$0.00</i>		<i>1</i>	<i>2010 WHI, MOTOR</i>	<i>TOYT Prius</i>	<i>JTDKN3DU4A0104839</i>
Officer/ID# <i>NEWSOME, D. (4EPD, C4EP) (C41449)</i>								
Invest ID# <i>NEWSOME, D. (4EPD, C4EP) (C41449)</i>						Supervisor <i>CAPPI, A. (4HPD, C4HP) (C40961)</i>		
Status	Complainant Signature		Case Status <i>Active</i>		<i>03/01/2023</i>	Case Disposition: <i>Not Applicable (not</i>		<i>03/01/2023</i>
Page 1								

Incident Report Additional Name List

Harris County Constable's Office Pct. 4

OCA: 2303-00095

Additional Name List

Name Code/#	Name (Last, First, Middle)	Victim of Crime #	DOB	Age	Race	Sex
1) PG 2	RUNYON, MISTY DAWN		DATES OF	46	W	F
Address	802 CYPRESSWOOD BOUGH, SPRING, TX 77373-		H:	915-834-9538		
Empl/Addr			B:	- -		
			Mobile #1	- -		

Unofficial Copy Office of Marilyn Burgess District Clerk

INCIDENT/INVESTIGATION REPORT

Harris County Constable's Office Pct. 4

Case # 2303-00095

Status Codes	1 = None	2 = Burned	3 = Counterfeit / Forged	4 = Damaged / Vandalized	5 = Recovered	6 = Seized	7 = Stolen	8 = Unknown
D R U G S	IBR	Status	Quantity	Type Measure	Suspected Type		Up to 3 types of activity	
Assisting Officers								

Suspect Hate / Bias Motivated: *NONE (NO BIAS)*

INCIDENT/INVESTIGATION REPORT

Narr. (cont.) OCA: 2303-00095

Harris County Constable's Office Pct. 4

<p>NARRATIVE</p> <p>complainant advsied she has custody of kids and there biological mom was on her way to take the kids.</p>
--

REPORTING OFFICER NARRATIVE

Harris County Constable's Office Pct. 4

OCA

2303-00095

Victim

RUNYON, MISTY DAWN

Offense

CIVIL CHILD CUSTODY DISPUTE

Date / Time Reported

Wed 03/01/2023 18:27

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Scene summary:

The scene was the 802 cypresswood bough, Houston Harris County, Texas. 802 cypresswood bough a public roadway that extends east to west for vehicular traffic with the nearest intersection being cypresswood springs. The Residence was north of the roadway with the main entrance facing south.

Lighting conditions were Dark due to day night time hours.

Narrative

On February 1, 2023 I Deputy D. Newsome was assigned as unit 4N106 on uniform patrol for station eight east patrol. While on patrol I was dispatched to a Domestic prevent call.

Upon arrival I was met by complainant identified by her Texas driver's license as Misty Runyon. Ms. Runyon advised she was giving temporary custody of two children identified by their names and age as Angela Sobel age 15 and Alexander Sobel age 13. I did not make contact with the children they were inside of the listed address above preparing for dinner.

Ms. Runyon advised custody was giving to her by the deceased parent of the children whom was her former employer. The mom of the children identified by her Texas driver's license number as Jennifer grant advised she was there to pick up the kids. I advised all parties that I would contact cps and get the facts of what was going on.

I spoke with Cps case worker Dora agent Id 5658 Report id 773187 who advised the children are not to go with mom and she has no custody of the children. I advised all parties with my findings and told them they will have to go to court to set up a child custody agreement.

Officer's Actions:

I, Deputy D. Newsome collected the complainants Information and ran it through NCIC TCIC. I provided the complainant with a business card with this case number along with my name and unit number on it as well.

No other information at this time.

End of report

Incident Report Suspect List

Harris County Constable's Office Pct. 4

OCA: 2303-00095

1	Name (Last, First, Middle) GRANT, JENNIFER AISLINN						Also Known As				Home Address 5939 DUMFRIES DR HOUSTON, TX 77096 713-876-5115																																											
	Business Address																																																					
	DOB DATES OF	Age 45	Race W	Sex F	Eth N	Hgt 505	Wgt 180	Hair BRO	Eye GRN	Skin	Driver's License / State ID/DL																																											
Scars, Marks, Tattoos, or other distinguishing features																																																						
<table border="1"> <tr> <td colspan="2">Reported Suspect Detail</td> <td colspan="2">Suspect Age</td> <td>Race</td> <td>Sex</td> <td>Eth</td> <td colspan="2">Height</td> <td colspan="2">Weight</td> <td colspan="2">SSN</td> </tr> <tr> <td colspan="2">Weapon, Type</td> <td colspan="2">Feature</td> <td colspan="2">Make</td> <td colspan="2">Model</td> <td colspan="2">Color</td> <td colspan="2">Caliber</td> <td colspan="2">Dir of Travel Mode of Travel</td> </tr> <tr> <td colspan="3">Veh Yr / Make / Model</td> <td>Drs</td> <td colspan="2">Style</td> <td colspan="2">Color</td> <td colspan="3">Lic Plate / State</td> <td colspan="3">VIN</td> </tr> </table>														Reported Suspect Detail		Suspect Age		Race	Sex	Eth	Height		Weight		SSN		Weapon, Type		Feature		Make		Model		Color		Caliber		Dir of Travel Mode of Travel		Veh Yr / Make / Model			Drs	Style		Color		Lic Plate / State			VIN		
Reported Suspect Detail		Suspect Age		Race	Sex	Eth	Height		Weight		SSN																																											
Weapon, Type		Feature		Make		Model		Color		Caliber		Dir of Travel Mode of Travel																																										
Veh Yr / Make / Model			Drs	Style		Color		Lic Plate / State			VIN																																											
Notes							Physical Char																																															

Incident Report Related Vehicle List

Harris County Constable's Office Pct. 4

OCA: 2303-00095

1	VehYr/Make/Model 2010 TOYT, Prius				Style 4H		Color WHI		Lic/Lis MOTOR VEHICLE		VIN MOTOR VEHICLE INFO		
	IBR Status None				Date 03/01/2023		Location 802 CYPRESSWOOD BOUGH TX						
	Condition			Value \$0.00			Offense Code		Jurisdiction Locally		State #		NIC #
	Name (Last, First, Middle) * No name *						Also Known As				Home Address		
	Business Address												
	DOB		Age	Race	Sex	Hgt	Wgt	Scars, Marks, Tattoos, or other distinguishing features					

Notes

CASE SUPPLEMENTAL REPORT

Printed: 02/12/2025 09:50

Harris County Constable's Office Pct. 4

OCA: **230300095**

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: **ACTIVE**

Case Mng Status: **CLOSED**

Occurred: **03/01/2023**

Offense: **CIVIL CHILD CUSTODY DISPUTE**

Investigator: **DELEON, R. (C41604)**

Date / Time: **08/26/2023 20:09:07, Saturday**

Supervisor: **GHEEN, B. (C40544)**

Supervisor Review Date / Time: **08/27/2023 11:34:14, Sunday**

Contact:

Reference: **Follow Up Supplement**

Harris County Constable Precinct 4

Deputy R. Guevarra / C41604 / 4E04

Case Number: 2303-00095 - supplement

SCENE SUMMARY:

The scene is a residential complex, located at 802 Cypresswood Bough, Spring, TX 77373. The building is a two-story structure made of wood and brick. The building sits on the west side of a not outlet roadway facing east with the main entrance facing north. Cypresswood Bough is a two-lane roadway with one eastbound and one westbound lane of traffic, undivided.

The scene is described as the exterior main entrance of property.

Lighting and visibility were clear due to natural daylight illuminating the area during the hours which the call was generated.

NARRATIVE:

On 08/26/2023 I, Deputy R. Guevarra - unit # 4E04 was dispatched to the above listed address regarding a Disturbance Family.

DEPUTY ACTIONS:

I arrived on scene and met with the reporting party, identified by [REDACTED] ID/DL [REDACTED] as Runyon, Kristopher Damon - [REDACTED] DATES OF BIRTH [REDACTED] and his spouse identified by [REDACTED] ID/DL [REDACTED] as Runyon, Misty Dawn - [REDACTED] DATES OF BIRTH [REDACTED]

Kristopher and Misty advised the biological mother of Misty's children, identified by Texas driver license # 17064412 as Grant, Jennifer Aislinn - [REDACTED] DATES OF BIRTH [REDACTED] was at their residence and refused to leave without taking custody of the children. They provided court order # 2016-22196, stating they had custody of the children and Grant was not permitted on the property.

Grant stated the document was fake, she had rights to her child as their biological mother, demanded their

Investigator Signature

Supervisor Signature

CASE SUPPLEMENTAL REPORT

Printed: 02/12/2025 09:50

Harris County Constable's Office Pct. 4

OCA: **230300095**

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: *ACTIVE*

Case Mng Status: *CLOSED*

Occurred: *03/01/2023*

Offense: *CIVIL CHILD CUSTODY DISPUTE*

Investigator: *DELEON, R. (C41604)*

Date / Time: *08/26/2023 20:09:07, Saturday*

Supervisor: *GHEEN, B. (C40544)*

Supervisor Review Date / Time: *08/27/2023 11:34:14, Sunday*

Contact:

Reference: *Follow Up Supplement*

released and would not leave until they were given to her.

I returned to the Runyon's and advised them of the information Grant gave and to contact the civil courts to resolve the situation.

Deputy T. Hamilton - unit # 4E86 and Deputy D. Newsome - unit # 4E75 arrived on scene and verified the court order. They further advised Grant to leave the area, who mentioned she would file a rit in court. Grant was observed leaving the scene in a grey in color Toyota Prius bearing **MOTOR VEHICLE INFO** without incident.

I cleared the scene without incident.

The scene was documented by my agency assigned Body Worn Camera # 351024743923671.

End of report - nothing follows.

Investigator Signature

Supervisor Signature

CASE SUPPLEMENTAL REPORT

Printed: 02/12/2025 09:50

Harris County Constable's Office Pct. 4

OCA: **230300095**

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: *ACTIVE*

Case Mng Status: *CLOSED*

Occurred: *03/01/2023*

Offense: *CIVIL CHILD CUSTODY DISPUTE*

Investigator: *CORONADO, C. (C40192)*

Date / Time: *10/25/2023 11:14:35, Wednesday*

Supervisor: *CORONADO, C. (C40192)*

Supervisor Review Date / Time: *10/25/2023 11:21:16, Wednesday*

Contact:

Reference: *Follow Up Supplement*

Sgt. C. Coronado

On 10/25/2023 Sgt. C. Coronado reviewed the above mentioned case and found no criminal offense had taken place.

End supplement.

Unofficial Copy Office of Marilyn Burgess District Clerk

Investigator Signature

Supervisor Signature

Redaction Log

Total Number of Redactions in Document: 15

Redaction Reasons by Page

Page	Reason	Description	Occurrences
1	DATES OF BIRTH	The records are redacted in accordance with Section 552.101 of the Texas Government Code and Paxton v. City of Dallas 2015 WL 339401 (Tex. App.?Austin May 22 2015 pet. denied).	3
1	MOTOR VEHICLE INFO	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	1
2	DATES OF BIRTH	The records are redacted in accordance with Section 552.101 of the Texas Government Code and Paxton v. City of Dallas 2015 WL 339401 (Tex. App.?Austin May 22 2015 pet. denied).	1
5	DATES OF BIRTH	The records are redacted in accordance with Section 552.101 of the Texas Government Code and Paxton v. City of Dallas 2015 WL 339401 (Tex. App.?Austin May 22 2015 pet. denied).	1
5	ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	1
6	MOTOR VEHICLE INFO	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2
7	ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2
7	DATES OF BIRTH	The records are redacted in accordance with Section 552.101 of the Texas Government Code and Paxton v. City of Dallas 2015 WL 339401 (Tex. App.?Austin May 22 2015 pet. denied).	3
8	MOTOR VEHICLE INFO	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	1

3DJH RI

&HUWLILHG 'RFXPHQW 1XPEHU

Redaction Log

Redaction Reasons by Exemption

Reason	Description	Pages (Count)
DATES OF BIRTH	The records are redacted in accordance with Section 552.101 of the Texas Government Code and Paxton v. City of Dallas 2015 WL 339401 (Tex. App.?Austin May 22 2015 pet. denied).	1(3) 2(1) 5(1) 7(3)
ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	5(1) 7(2)
MOTOR VEHICLE INFO	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	1(1) 6(2) 8(1)

&HUWLILHG 'RFXPHQW 1XPEHU 3DJH RI

Unofficial Copy Office of Marilyn Burgess District Clerk

COMMUNICATIONS

Event Report

Event ID: **2023-2860255**

Call Ref #: 45

Date/Time Received: 08/26/23 18:31:20

Rpt #:

Prime
Unit:

Services Involved

Call Source: W911

LAW

Location: **802 CYPRESSWOOD BOUGH**

M110/E

X-ST:

CYPRESSWOOD SPRINGS

Jur: CAD

Service: LAW

Agency: HCC4

St/Beat: 4064

District: B

RA:

Business:

Phone:

GP: 4464

Nature: **DISTURBANCE OTHER**

Alarm Lvl: 1 Priority: 2

Medical Priority:

Reclassified Nature:

Caller: JENNIFER GRANT

Addr: 401 POWELL RD

Phone: (713) 321-0397

Alarm:

Alarm Type:

Vehicle #:

St:

Report Only: No

Race:

Sex:

Age:

Call Taker: EMILIE.LOEBLEIN

Console: PSHP0052

Geo-Verified Addr.: Yes Nature Summary Code:

Disposition: DUP

Close Comments:

Notes: JENNIFER GRANT (713) 321-0397 [08/26/23 18:39:22 ASHLEE.ASPRAS]
CREPT NREF TO UNLAWFUL HOLDING HER CHILDREN AGAINST HER WILL /CHILD CUSTODY/ MISTY AND
KRISTOPHER RUNYON IS HOLDING HER CHILDREN 2X / VERBAL ONLY/ REPT WRG BLU SHIRT BLU JNS/ RUNYONS
HAVE WEAPONS IN THE HOME/ UNKN INTOX/ UNKN MHI [08/26/23 18:36:02 EMILIE.LOEBLEIN] [08/26/23 18:39:06
ASHLEE.ASPRAS]
Linked Events 2023-2860256(46) to 2023-2860255(45) [08/26/23 18:38:39 JENA.HARGROVE]
CREPT NREF TO UNLAWFUL HOLDING HER CHILDREN AGAINST HER WILL /CHILD CUSTODY/ MISTY AND
KRISTOPHER RUNYON IS HOLDING HER CHILDREN 2X / VERBAL ONLY/ REPT WRG BLU SHIRT BLU JNS/ RUNYONS
HAVE WEAPONS IN THE HOME/ UNKN INTOX/ UNKN MHI [08/26/23 18:36:02 EMILIE.LOEBLEIN]

Times

Call Received: 08/26/23 18:31:20

Time From Call Received

Call Routed: 08/26/23 18:36:10

000:04:50

Unit Reaction:

(1st Dispatch to 1st Arrive)

Call Take Finished: 08/26/23 18:36:10

000:04:50

En-Route:

(1st Dispatch to 1st En-Route)

1st Dispatch:

(Time Held)

On-Scene:

(1st Arrive to Last Clear)

1st En-Route:

1st Arrive:

(Reaction Time)

Last Clear:

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
		TR	Time Received	08/26/23 18:31:20	By: E911		EMILIE.LOE
		ENT	Entered Street	08/26/23 18:31:20	321 POWELL - W;SPRI		EMILIE.LOE
		CHG	Changed Street	08/26/23 18:31:49	401 POWELL RD --> 802 CYRESSWO		EMILIE.LOE
		DLS	Duplicate List	08/26/23 18:32:02	Potential Duplicate Events Listed (1		EMILIE.LOE
		CHG	Changed Street	08/26/23 18:32:05	802 CYRESSWOOD BOUGH --> 802 C		EMILIE.LOE

Report Generated: 02/12/2025 09:50:52 | User ID: JESELY.GONZALEZ

Note: Comments may truncate in portrait. Use landscape to avoid truncation.

fs.hc.hctx.net\PSApps\CAD\PROD\OSSI\CAD\cad\rpt
EventHistory_Event_Portrait

CHG	Changed CallerName_	08/26/23 18:32:15	VERIZON --> JENNIFER GRANT	EMILIE.LOE
ARM	Added Remarks	08/26/23 18:36:02		EMILIE.LOE
ENT	Entered Nature	08/26/23 18:36:04	DISTURBANCE OTHER	EMILIE.LOE
FIN	Finished Call Taking	08/26/23 18:36:10		EMILIE.LOE
VEV	Viewed Event	08/26/23 18:36:20	User First Viewed Event CAD	JENA.HARG
CHG	Changed AddSt	08/26/23 18:36:32	DIST: DIST: 15.13 FT --> M110/E	JENA.HARG
LINK	Linked Events	08/26/23 18:38:38	Linked Events 2023-2860256(46) to 202	JENA.HARG
ARM	Added Remarks	08/26/23 18:38:39		JENA.HARG
VEV	Viewed Event	08/26/23 18:38:58	User First Viewed Event CAD	ASHLEE.AS
ARM	Added Remarks	08/26/23 18:39:06		ASHLEE.AS
ARM	Added Remarks	08/26/23 18:39:06	Sent to: Linked Events	ASHLEE.AS
ARM	Added Remarks	08/26/23 18:39:22		ASHLEE.AS
ARM	Added Remarks	08/26/23 18:39:22	Sent to: Linked Events	ASHLEE.AS
CAN	Event Cancelled	08/26/23 18:39:27		DUP ASHLEE.AS

Unofficial Copy Office of Marilyn Burgess District Clerk

COMMUNICATIONS

Event Report

Event ID: **2023-2860256**

Call Ref #: 46

Date/Time Received: 08/26/23 18:31:24

Rpt #:

Prime 4E04

Services Involved

Call Source: W911

Unit: GUEVARRA, REINALD

LAW

Location: **802 CYPRESSWOOD BOUGH**

M110/E

X-ST:

CYPRESSWOOD SPRINGS

Jur: CAD

Service: LAW

Agency: HCC4

St/Beat: 4064

District: B

RA:

Business:

Phone:

GP: 4464

Nature: **DIST FAMILY**

Alarm Lvl: 1 Priority: 2

Medical Priority:

Reclassified Nature:

Caller: CHRISTOPHER

Addr: 802 CYPRESSWOOD BOUGH

Phone: (915) 834-9523

Alarm:

Alarm Type:

Vehicle #: SGK9250

St: TX

Report Only: No

Race:

Sex:

Age:

Call Taker: CYNTHIA.MAYER

Console: PSHP0030

Geo-Verified Addr.: Yes Nature Summary Code:

Disposition: SPL

Close Comments:

Notes: {4E48} TX LP/ SGK9250 [08/26/23 18:48:16 JENA.HARGROVE]
#6969 [08/26/23 18:43:09 JENA.HARGROVE]
REP CB CHECKING STATUS/ ADV UNIT ENROUTE [08/26/23 18:41:25 MENDESA.BROWN]
[LAW] JENNIFER GRANT (713) 321-0397 [08/26/23 18:39:22 ASHLEE.ASPRAS]
[LAW] CREPT NREF TO UNLAWFUL HOLDING HER CHILDREN AGAINST HER WILL /CHILD CUSTODY/ MISTY AND KRISTOPHER RUNYON IS HOLDING HER CHILDREN 2X /VERBAL ONLY/ REPT WRG BLU SHIRT BLU JNS/ RUNYONS HAVE WEAPONS IN THE HOME/ UNKN INTOX/ UNKN MHI [08/26/23 18:36:02 EMILIE.LOEBLEIN] [08/26/23 18:39:06 ASHLEE.ASPRAS]
Linked Events 2023-2860256(46) to 2023-2860255(45) [08/26/23 18:38:38 JENA.HARGROVE]
rep advd jennifer is unhappy with the court order and she is trying to take the kids [08/26/23 18:34:00 CYNTHIA.MAYER]
UDTS: HCSO GENERAL BROADCAST [08/26/23 18:33:43 YLANA.GONZALES]
gc #6969
crep nrf Jennifer grant - wfm gry shirt, blu jns, refusing to leave reps property and trying to force her way into the house, child custody dispute [08/26/23 18:32:52 CYNTHIA.MAYER]

Times

Call Received: 08/26/23 18:31:24

Time From Call Received

Call Routed: 08/26/23 18:33:24

000:02:00

Unit Reaction: 000:08:30 (1st Dispatch to 1st Arrive)

Call Take Finished: 08/26/23 18:33:24

000:02:00

En-Route: (1st Dispatch to 1st En-Route)

1st Dispatch: 08/26/23 18:35:43

000:04:19

(Time Held)

On-Scene: 000:41:54 (1st Arrive to Last Clear)

1st En-Route: 08/26/23 18:35:43

000:04:19

1st Arrive: 08/26/23 18:44:13

000:12:49

(Reaction Time)

Last Clear: 08/26/23 19:26:07

000:54:43

Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
4E04	C41604	D	Dispatched	08/26/23 18:35:43	Stat/Beat: 4093		JENA.HARG
4E04	C41604	E	En-Route	08/26/23 18:35:43	Stat/Beat: 4093		JENA.HARG

Report Generated: 02/12/2025 09:51:27 | User ID: JESELY.GONZALEZ

Note: Comments may truncate in portrait. Use landscape to avoid truncation.

4H74	C41470	D	Dispatched	08/26/23 18:38:11	Stat/Beat: 4156	JENA.HARG
4H74	C41470	E	En-Route	08/26/23 18:38:11	Stat/Beat: 4156	JENA.HARG
4E75	C41449	D	Dispatched	08/26/23 18:38:30	Stat/Beat: 4127	JENA.HARG
4E75	C41449	E	En-Route	08/26/23 18:38:30	Stat/Beat: 4127	JENA.HARG
4E48	C41631	D	Dispatched	08/26/23 18:38:31	Stat/Beat: 4077	CARLOS.RO
4E48	C41631	E	En-Route	08/26/23 18:38:31	Stat/Beat: 4077	CARLOS.RO
4E04	C41604	AET	Auto Enroute Timesta	08/26/23 18:39:12	Current status is:E. Offset of 2 seconds.	REINALD.G
4E48	C41631	AET	Auto Enroute Timesta	08/26/23 18:40:21	Current status is:E. Offset of 26 second	CARLOS.RO
4H74	C41470	X	Canceled	08/26/23 18:40:24		JENA.HARG
4E75	C41449	AET	Auto Enroute Timesta	08/26/23 18:42:01	Current status is:E. Offset of 23 second	DARIUS.NE
4E04	C41604	A	Arrived	08/26/23 18:44:13	Auto-arriving with offset of 0 seconds.	REINALD.G
4E48	C41631	A	Arrived	08/26/23 18:44:33	Auto-arriving with offset of 30 seconds.	CARLOS.RO
4E75	C41449	A	Arrived	08/26/23 18:50:49	Auto-arriving with offset of 0 seconds.	DARIUS.NE
4E86	C41565	D	Dispatched	08/26/23 18:51:19	Stat/Beat: 4065	TYSON.HAM
4E86	C41565	E	En-Route	08/26/23 18:51:19	Stat/Beat: 4065	TYSON.HAM
4E86	C41565	AET	Auto Enroute Timesta	08/26/23 18:51:25	Current status is:E. Offset of 3 seconds.	TYSON.HAM
4E48	C41631	ENT	Entered Related Name	08/26/23 18:55:59	[LastName:] RUNYON ID/DL	CARLOS.RO
4E86	C41565	A	Arrived	08/26/23 18:56:10	Auto-arriving with offset of 0 seconds.	TYSON.HAM
4E48	C41631	ENT	Entered Related Name	08/26/23 18:56:43	[LastName:] RUNYON ID/DL	CARLOS.RO
4E48	C41631	ENT	Entered Related Name	08/26/23 18:57:07	[LastName:] GRANT ID/DL	CARLOS.RO
4E48	C41631	C	Cleared	08/26/23 19:12:49	[CBU]	CBU CARLOS.RO
4E75	C41449	C	Cleared	08/26/23 19:19:26	[CBU]	CBU DARIUS.NE
4E86	C41565	C	Cleared	08/26/23 19:20:21	[CBU]	CBU TYSON.HAM
4E04	C41604	C	Cleared	08/26/23 19:26:07	[SPL]	SPL REINALD.G

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
		TR	Time Received	08/26/23 18:31:24	By: E911		CYNTHIA.M
		ENT	Entered Street	08/26/23 18:31:24	1009 B LEMM ROAD 1 -,SPRI		CYNTHIA.M
		VER	Verified Street	08/26/23 18:31:30	802 CYPRESSWOOD BOUGH		CYNTHIA.M
		ARM	Added Remarks	08/26/23 18:32:52			CYNTHIA.M
		ENT	Entered Caller Name, C	08/26/23 18:33:22	CHRISTOPHER		CYNTHIA.M
		ENT	Entered Nature	08/26/23 18:33:23	DIST FAMILY		CYNTHIA.M
		FIN	Finished Call Taking	08/26/23 18:33:24			CYNTHIA.M
		VEV	Viewed Event	08/26/23 18:33:34	User First Viewed Event CAD		YLANA.GON
		VCH	Viewed Call History	08/26/23 18:33:38	Location Information		CYNTHIA.M
		CHG	Changed AddSt	08/26/23 18:33:42	ALT: 2 DIST: DIST: 20.06 FT --> M110/		YLANA.GON
		GB	HCSO GENERAL BRO	08/26/23 18:33:42			YLANA.GON
		ARM	Added Remarks	08/26/23 18:33:43			YLANA.GON
		ARM	Added Remarks	08/26/23 18:34:00			CYNTHIA.M
		VEV	Viewed Event	08/26/23 18:34:33	User First Viewed Event CAD		ASHLEE.AS
		VEV	Viewed Event	08/26/23 18:35:41	User First Viewed Event CAD		JENA.HARG
		VEV	Viewed Event	08/26/23 18:38:11	User First Viewed Event CAD		EMILIE.LOE
		LINK	Linked Events	08/26/23 18:38:38	Linked Events 2023-2860256(46) to 202		JENA.HARG
		ARM	Added Remarks	08/26/23 18:38:38			JENA.HARG
		ARM	Added Remarks	08/26/23 18:39:06	Notes sent from LAW event #20232860		ASHLEE.AS
		ARM	Added Remarks	08/26/23 18:39:22	Notes sent from LAW event #20232860		ASHLEE.AS

	VEV	Viewed Event	08/26/23 18:39:29	User First Viewed Event CAD	MJENSEN
	VEV	Viewed Event	08/26/23 18:40:30	User First Viewed Event CAD	MENDESA.B
	ARM	Added Remarks	08/26/23 18:41:25		MENDESA.B
	ARM	Added Remarks	08/26/23 18:43:09		JENA.HARG
	ARM	Added Remarks	08/26/23 18:48:16		JENA.HARG
	ENT	Entered VehicleID	08/26/23 18:48:22	[ID: 4442382] SGK9250	JENA.HARG
	ENT	Entered VehicleState	08/26/23 18:48:22	[ID: 4442382] TX	JENA.HARG
	ENT	Entered LicenseType	08/26/23 18:48:22	[ID: 4442382] PC	JENA.HARG
4E48	C41631	NCIC QRY: Names	08/26/23 18:55:58	1) Unit:4E48 LNAME= FNAME= DOB=	Unit:4E48
4E48	C41631	... QRY: Names...	08/26/23 18:55:58	2) [REDACTED] ID/DL [REDACTED] OLN=TX S2SAgency	Unit:4E48
4E48	C41631	NCIC QRY: Names	08/26/23 18:56:43	1) Unit:4E48 LNAME= FNAME= DOB=	Unit:4E48
4E48	C41631	... QRY: Names...	08/26/23 18:56:43	2) [REDACTED] ID/DL [REDACTED] OLN=TX S2SAgency	Unit:4E48
	RSW	Reset Watchdog Timer	08/26/23 18:57:04	Units: 4E04,4E48,4E75,4E86 >>> 40Mi	JENA.HARG
4E48	C41631	NCIC QRY: Names	08/26/23 18:57:06	1) Unit:4E48 LNAME= FNAME= DOB=	Unit:4E48
4E48	C41631	... QRY: Names...	08/26/23 18:57:06	2) [REDACTED] ID/DL [REDACTED] OLN=TX S2SAgency	Unit:4E48
	VEV	Viewed Event	08/26/23 19:11:20	User First Viewed Event CAD	DEJA.LOVE

Employee Info

Unit	Empl ID	Name
4E04	C41604	GUEVARRA, REINALD
4E48	C41631	RODRIGUEZ FUENTES, CARLOS
4E75	C41449	NEWSOME, DARIUS
4E86	C41565	HAMILTON, TYSON
4H74	C41470	RACHAL, JOHN

Redaction Log

Total Number of Redactions in Document: 6

Redaction Reasons by Page

Page	Reason	Description	Occurrences
2	ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	3
3	ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	3

Unofficial Copy Office of Marilyn Burgess District Clerk

Redaction Log

Redaction Reasons by Exemption

Reason	Description	Pages (Count)
ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2(3) 3(3)

Unofficial Copy Office of Marilyn Burgess District Clerk

COMMUNICATIONS

Event Report

Event ID: **2024-0021154**

Call Ref #: 955

Date/Time Received: 01/03/24 00:04:37

Rpt #: 2401-00248

Prime 84258

Services Involved

Call Source: W911

Unit: TURNER, BRAXTON

LAW

Location: **802 CYPRESSWOOD BOUGH**

M110/E

X-ST:

CYPRESSWOOD SPRINGS

Jur: CAD

Service: LAW

Agency: HCC4

St/Beat: 4064

District: B

RA:

Business:

Phone:

GP: 4464

Nature: **CHILD CUSTODY DISP**

Alarm Lvl: 1 Priority: 2

Medical Priority:

Reclassified Nature:

Caller: JENNIFER

Alarm:

Addr: 811 CYPRESSWOOD BOUGH

Phone: (713) 321-0397

Alarm Type:

Vehicle #:

St:

Report Only: No

Race:

Sex:

Age:

Call Taker: ANNALEESA.KIRSCHKE

Console: PSHP0024

Geo-Verified Addr.: Yes Nature Summary Code:

Disposition: REP

Close Comments:

Notes: I REVIEW THE COURT ORDER FROM CHRISTOPHER WHICH SHOWS HE HAS CUSTODY OVER HIS GOD CHILDREN AND JENNIFER HAS NO RIGHTS OUR VISITATIONS WITH HER KIDS. CHRISTOPHER ADV JENNIFER KEEPS HARASSING AND SHOWING UP AT HIS RESIDENCE. HE ADV HE WANTED HER CRIMINAL TRESPASS FROM HIS PROPERTY. A CTW WAS GENERATED IN WHICH JENNIFER REFUSE TO SIGNED. SHE ADV TO LEAVE THE LOC IN WHICH SHE COMPLIED AND LEFT. [01/03/24 01:09:03 Unit:84258]
GATECODE: #7900 [01/03/24 00:15:59 YLANA.GONZALES]
GATE CODE? [01/03/24 00:15:32 Unit:4E37]
*****2ND CALLER*****

CHRIS (915) 834-9523

CREP NREF TO HIS GOD SON'S MOTHER 50-55 YO WF JENNIFER GRANT OUTSIDE HIS HOME TRYING TO GET INSIDE THE HOUSE / SUBJECT HAS BEEN AT LOC FOR ABOUT 20 MINUTES / SUBJECT IS IN A GREY TOYOTA PRIUS / REP ADV HE DOESN'T WANT TO LET HER IN OR GO OUTSIDE BECAUSE HE KNOWS IT WILL BE A CONFRONTATION / UNK WEAPONS / NOI [01/03/24 00:12:44 TROY.CABALLERO]
UDTS: NO HOLIST ASST RESP TEAM [01/03/24 00:13:07 TROY.CABALLERO] [01/03/24 00:14:04 YLANA.GONZALES]
Linked Events 2024-0021154(955) to 2024-0021177(978) [01/03/24 00:13:23 YLANA.GONZALES]
ADV 8439 [01/03/24 00:10:14 YLANA.GONZALES]
UDTS: HCSO GENERAL BROADCAST [01/03/24 00:09:11 YLANA.GONZALES]
CREP IN A SILVER PRIUS NREF TO HER XHUSBANDS FORMER EMPLOYEE KIDNAPPED HER KIDS WHEN SHE WAS IN A COMA //REP REFUSED TO GIVE ANY INFO AND STATED SHE WILL SHOW OFFICERS EVERYTHING WHEN THEY ARRIVE ONSCN//REP ADV TO SEND A LIEUTENANT TO THE LOCATION [01/03/24 00:07:48 ANNALEESA.KIRSCHKE]

Times

Call Received: 01/03/24 00:04:37

Time From Call Received

Call Routed: 01/03/24 00:07:54

000:03:17

Unit Reaction: 000:05:44 (1st Dispatch to 1st Arrive)

Call Take Finished: 01/03/24 00:07:54

000:03:17

En-Route: (1st Dispatch to 1st En-Route)

1st Dispatch: 01/03/24 00:09:57

000:05:20 (Time Held)

On-Scene: 000:54:12 (1st Arrive to Last Clear)

1st En-Route: 01/03/24 00:09:57

000:05:20

1st Arrive: 01/03/24 00:15:41

000:11:04 (Reaction Time)

Last Clear: 01/03/24 01:09:53

001:05:16

Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
84258	C41074	D	Dispatched	01/03/24 00:09:57	Stat/Beat: 4065		YLANA.GON
84258	C41074	E	En-Route	01/03/24 00:09:57	Stat/Beat: 4065		YLANA.GON
84258	C41074	AET	Auto Enroute Timesta	01/03/24 00:10:01	Current status is:E. Offset of 2 seconds.		BRAXTON.T
8439	C40588	D	Dispatched	01/03/24 00:10:06			YLANA.GON
8439	C40588	E	En-Route	01/03/24 00:10:06			YLANA.GON
8439	C40588	AET	Auto Enroute Timesta	01/03/24 00:10:09	Current status is:E. Offset of 2 seconds.		CWEIKEL
4E37	C41511	D	Dispatched	01/03/24 00:10:28	Stat/Beat: 4131		SELINA.RO
4E37	C41511	E	En-Route	01/03/24 00:10:28	Stat/Beat: 4131		SELINA.RO
4E37	C41511	AET	Auto Enroute Timesta	01/03/24 00:10:32	Current status is:E. Offset of 2 seconds.		SELINA.RO
4E37	C41511	A	Arrived	01/03/24 00:15:41	Auto-arriving with offset of 30 seconds.		SELINA.RO
84258	C41074	A	Arrived	01/03/24 00:16:37	Auto-arriving with offset of 30 seconds.		BRAXTON.T
84258	C41074	ENT	Entered Related Vehicl	01/03/24 00:19:00	1) MOTOR VEHICLE INFO		BRAXTON.T
84258	C41074	...	Entered Related Vehicl	01/03/24 00:19:00	2) [state:] TX		BRAXTON.T
8439	C40588	A	Arrived	01/03/24 00:25:30	Auto-arriving with offset of 30 seconds.		CWEIKEL
84258	C41074	ENT	Entered Related Name	01/03/24 00:34:02	[LastName:] RUNYON ID/DL		BRAXTON.T
84258	C41074	ENT	Entered Related Name	01/03/24 00:34:14	[LastName:] GRANT ID/DL		BRAXTON.T
8439	C40588	C	Cleared	01/03/24 00:49:45	[CBU]	CBU	CWEIKEL
4E37	C41511	C	Cleared	01/03/24 01:05:08	[CBU]	CBU	SELINA.RO
84258	C41074	C	Cleared	01/03/24 01:09:53	[REP]	REP	BRAXTON.T

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
		TR	Time Received	01/03/24 00:04:37	By: E911		ANNALEES
		ENT	Entered Street	01/03/24 00:04:37	1009 LEMM RD;SPRI		ANNALEES
		VER	Verified Street	01/03/24 00:04:43	811 CYPRESSWOOD BOUGH		ANNALEES
		CHG	Changed Street	01/03/24 00:05:06	811 CYPRESSWOOD BOUGH --> 802		ANNALEES
		CHG	Changed Street	01/03/24 00:05:09	802CYPRESSWOOD BOUGH --> 802		ANNALEES
		CHG	Changed CallerName_	01/03/24 00:05:17	VERIZON WIRELESS --> JENNIFER		ANNALEES
		ARM	Added Remarks	01/03/24 00:07:48			ANNALEES
		ENT	Entered Nature	01/03/24 00:07:52	CHILD CUSTODY DISP		ANNALEES
		FIN	Finished Call Taking	01/03/24 00:07:54			ANNALEES
		VCH	Viewed Call History	01/03/24 00:08:03	Location Information		ANNALEES
		VEV	Viewed Event	01/03/24 00:09:07	User First Viewed Event CAD		YLANA.GON
		CHG	Changed AddSt	01/03/24 00:09:11	DIST: 38.1 FT --> M110/E		YLANA.GON
		GB	HCSO GENERAL BRO	01/03/24 00:09:11			YLANA.GON
		ARM	Added Remarks	01/03/24 00:09:11			YLANA.GON
		VEV	Viewed Event	01/03/24 00:09:53	User First Viewed Event CAD		KIMBERLY.

	ARM	Added Remarks	01/03/24 00:10:14		YLANA.GON
	VEV	Viewed Event	01/03/24 00:10:43	User First Viewed Event CAD	PATIENCE.
	VEV	Viewed Event	01/03/24 00:11:46	User First Viewed Event CAD	CALVIN.ALL
	LINK	Linked Events	01/03/24 00:13:23	1) Linked Events 2024-0021154(955) to	YLANA.GON
	...	Linked Events...	01/03/24 00:13:23	2) 2024-0021177(978)	YLANA.GON
	ARM	Added Remarks	01/03/24 00:13:23		YLANA.GON
	ARM	Added Remarks	01/03/24 00:14:04		YLANA.GON
	ARM	Added Remarks	01/03/24 00:15:32		Unit:4E37
	VPR	Viewed Premise	01/03/24 00:15:53	Location Information	YLANA.GON
	ARM	Added Remarks	01/03/24 00:15:59		YLANA.GON
84258	C41074	NCIC QRY: Vehicles	01/03/24 00:18:59	1) Unit:84258 TAG=SGK9250 STATE=T	Unit:84258
84258	C41074	... QRY: Vehicles...	01/03/24 00:18:59	2) (VesselRegNbr) VSLREG= S2SAgen	Unit:84258
	RSW	Reset Watchdog Timer	01/03/24 00:22:23	Units: 84258,4E37 >>> 60Min.	YLANA.GON
	RSW	Reset Watchdog Timer	01/03/24 00:30:56	Units: 8439,84258,4E37 >>> 40Min.	KIMBERLY.
84258	C41074	NCIC QRY: Names	01/03/24 00:34:01	1) Unit:84258 LNAME= FNAME= DOB=	Unit:84258
84258	C41074	... QRY: Names...	01/03/24 00:34:01	2) [REDACTED] ID/DL [REDACTED] OLN=TX S2SAgency	Unit:84258
84258	C41074	NCIC QRY: Names	01/03/24 00:34:14	1) Unit:84258 LNAME= FNAME= DOB=	Unit:84258
84258	C41074	... QRY: Names...	01/03/24 00:34:14	2) [REDACTED] ID/DL [REDACTED] OLN=TX S2SAgency	Unit:84258
84258	C41074	RPT Requested Report#	01/03/24 00:43:49	HCC4 Report #2401-00248 Unit:84258	BRAXTON.T
	VEV	Viewed Event	01/03/24 00:46:03	User First Viewed Event CAD	GRACELYN.
4E37	C41511	CHG Changed Related Nam	01/03/24 01:02:52	1) [REDACTED] DATES OF BIRTH 12:00:00 AM-->12/	SELINA.RO
4E37	C41511	... Changed Related Nam	01/03/24 01:02:52	2) Weight: 135-->135	SELINA.RO
	ARM	Added Remarks	01/03/24 01:09:03		Unit:84258

Employee Info

Unit	Empl ID	Name
4E37	C41511	ROCHA, SELINA
84258	C41074	TURNER, BRAXTON
8439	C40588	WEIKEL, CLAYTON

Redaction Log

Total Number of Redactions in Document: 6

Redaction Reasons by Page

Page	Reason	Description	Occurrences
2	MOTOR VEHICLE INFO	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	1
2	ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2
3	ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2
3	DATES OF BIRTH	The records are redacted in accordance with Section 552.101 of the Texas Government Code and Paxton v. City of Dallas 2015 WL 339401 (Tex. App. Austin May 22 2015 pet. denied).	1

&HUWLILHG 'RFXPHQW 1XPHEHU 3DJH RI

Redaction Log

Redaction Reasons by Exemption

Reason	Description	Pages (Count)
DATES OF BIRTH	The records are redacted in accordance with Section 552.101 of the Texas Government Code and Paxton v. City of Dallas 2015 WL 339401 (Tex. App.?Austin May 22 2015 pet. denied).	3(1)
ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2(2) 3(2)
MOTOR VEHICLE INFO	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2(1)

Unofficial Copy Office of Marilyn Burgess District Clerk

COMMUNICATIONS

Event Report

Event ID: **2024-0021177**

Call Ref #: 978

Date/Time Received: 01/03/24 00:09:04

Rpt #:

Prime
Unit:

Services Involved

Call Source: W911

LAW

Location: **802 CYPRESSWOOD BOUGH**

ALT: 10 DIST: DIST: 16.8 ft

X-ST:

CYPRESSWOOD SPRINGS

Jur: CAD

Service: LAW

Agency: HCC4

St/Beat: 4064

District: B

RA:

Business:

Phone:

GP: 4464

Nature: **DIST FAMILY**

Alarm Lvl: 1 Priority: 2

Medical Priority:

Reclassified Nature:

Caller: CHRIS

Addr: 802 CYPRESSWOOD BOUGH

Phone: (915) 834-9523

Alarm:

Alarm Type:

Vehicle #:

St:

Report Only: No

Race:

Sex:

Age:

Call Taker: TROY.CABALLERO

Console: PSHP0052

Geo-Verified Addr.: Yes Nature Summary Code:

Disposition: DUP

Close Comments:

Notes: Linked Events 2024-0021154(955) to 2024-0021177(978) [01/03/24 00:13:23 YLANA.GONZALES]
UDTS: NO HOLIST ASST RESP TEAM [01/03/24 00:13:07 TROY.CABALLERO]
CREP NREF TO HIS GOD SON'S MOTHER 50-55 YO WF JENNIFER GRANT OUTSIDE HIS HOME TRYING TO GET
INSIDE THE HOUSE / SUBJECT HAS BEEN AT LOC FOR ABOUT 20 MINUTES / SUBJECT IS IN A GREY TOYOTA PRIUS
/ REP ADV HE DOESN'T WANT TO LET HER IN OR GO OUTSIDE BECAUSE HE KNOWS IT WILL BE A
CONFRONTATION / UNK WEAPONS / NOI [01/03/24 00:12:44 TROY.CABALLERO]

Times

Call Received: 01/03/24 00:09:04

Time From Call Received

Call Routed: 01/03/24 00:13:08

000:04:04

Unit Reaction:

(1st Dispatch to 1st Arrive)

Call Take Finished: 01/03/24 00:13:08

000:04:04

En-Route:

(1st Dispatch to 1st En-Route)

1st Dispatch:

(Time Held)

On-Scene:

(1st Arrive to Last Clear)

1st En-Route:

(Reaction Time)

1st Arrive:

Last Clear:

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
		TR	Time Received	01/03/24 00:09:04	By: E911		TROY.CABA
		ENT	Entered Street	01/03/24 00:09:04	1009 B LEMM ROAD 1 -,SPRI		TROY.CABA
		VER	Verified Street	01/03/24 00:09:08	802 CYPRESSWOOD BOUGH		TROY.CABA
		DLS	Duplicate List	01/03/24 00:09:08	Potential Duplicate Events Listed (1		TROY.CABA
		ENT	Entered CallerName_C	01/03/24 00:09:24	CHRIS		TROY.CABA
		ARM	Added Remarks	01/03/24 00:12:44			TROY.CABA
		ENT	Entered Nature	01/03/24 00:13:02	DIST FAMILY		TROY.CABA

NOH	NO HOLIST ASST RE	01/03/24 00:13:07		TROY.CABA
ARM	Added Remarks	01/03/24 00:13:07		TROY.CABA
FIN	Finished Call Taking	01/03/24 00:13:08		TROY.CABA
VEV	Viewed Event	01/03/24 00:13:12	User First Viewed Event CAD	CALVIN.ALL
VEV	Viewed Event	01/03/24 00:13:16	User First Viewed Event CAD	YLANA.GON
LINK	Linked Events	01/03/24 00:13:23	1) Linked Events 2024-0021154(955) to	YLANA.GON
...	Linked Events...	01/03/24 00:13:23	2) 2024-0021177(978)	YLANA.GON
ARM	Added Remarks	01/03/24 00:13:23		YLANA.GON
CAN	Event Cancelled	01/03/24 00:14:03		YLANA.GON

DUP

Unofficial Copy Office of Marilyn Burgess District Clerk

COMMUNICATIONS

Event Report

Event ID: 2024-2335941

Call Ref #: 23

Date/Time Received: 07/19/24 19:08:18

Rpt #:

Prime 4E86

Services Involved

Call Source: PHONE

Unit: HAMILTON, TYSON

LAW

Location: 802 CYPRESSWOOD BOUGH

M110-E

X-ST:

CYPRESSWOOD SPRINGS

Jur: CAD

Service: LAW

Agency: HCC4

St/Beat: 4064

District: B

RA:

Business:

Phone:

GP: 4464

Nature: CHILD CUSTODY DISP

Alarm Lvl: 1 Priority: 2

Medical Priority:

Reclassified Nature:

Caller: JENNIFER

Alarm:

Addr: 802 CYPRESSWOOD BOUGH

Phone: (713) 321-0397

Alarm Type:

Vehicle #:

St:

Report Only: No

Race:

Sex:

Age:

Call Taker: KAREN.RAMOS

Console: PHCC4005

Geo-Verified Addr.: Yes Nature Summary Code:

Disposition: ADV

Close Comments:

Notes: {4E75} UNITS U/C VIA PUB SERV [07/19/24 19:57:51 JENA.HARGROVE]

Rep called for eta [07/19/24 19:39:13 IVY.CARLSON]

CREP

REP ADV MOTHER OF GODCHILDREN WF JENNIFER GRANT UNK CLOTHING DESC IS OUTSIDE LOC FOR HER CHILDREN / REP ADV SUBJ HAS BEEN TRESSPASSED FROM PROPERTY BEFORE AND LOST CUSTODY OF CHILDRE/ UNK WEAP / UNK INTOX / UNK MHI / LASPE TIME UNK [07/19/24 19:31:55 BREANNA.TAYLOR]

UDTS: NO HOLIST ASST RESP TEAM [07/19/24 19:32:03 BREANNA.TAYLOR] [07/19/24 19:33:58 JOSED.AMAYA]

[LAW] CHRISTOPHER-915-834-9523 [07/19/24 19:33:51 JOSED.AMAYA]

Linked Events 2024-2335941(23) to 2024-2336112(237) [07/19/24 19:33:28 JOSED.AMAYA]

UDTS: HCSO GENERAL BROADCAST [07/19/24 19:09:35 JOSED.AMAYA]

CREP IN A 2010 SILVER TOYT PRIUS, REP ADV SHE IS ENR TO THIS LOC TO PICK UP HER 2 CHILDREN. REP ADV HER ETA IS LESS THAN 13 MIN. [07/19/24 19:09:05 KAREN.RAMOS]

Times

Call Received: 07/19/24 19:08:18

Time From Call Received

Call Routed: 07/19/24 19:09:20

000:01:02

Unit Reaction: 000:05:34 (1st Dispatch to 1st Arrive)

Call Take Finished: 07/19/24 19:09:20

000:01:02

En-Route: (1st Dispatch to 1st En-Route)

1st Dispatch: 07/19/24 19:09:42

000:01:24 (Time Held)

On-Scene: 001:24:51 (1st Arrive to Last Clear)

1st En-Route: 07/19/24 19:09:42

000:01:24

1st Arrive: 07/19/24 19:15:16

000:06:58 (Reaction Time)

Last Clear: 07/19/24 20:40:07

001:31:49

Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
4E86	C41565	D	Dispatched	07/19/24 19:09:42	Stat/Beat: 4065		JOSED.AMA
4E86	C41565	E	En-Route	07/19/24 19:09:42	Stat/Beat: 4065		JOSED.AMA
4E86	C41565	AET	Auto Enroute Timesta	07/19/24 19:09:44	Current status is:E. Offset of 1 seconds.		TYSON.HAM

Report Generated: 02/12/2025 09:53:36 | User ID: JESELY.GONZALEZ

Note: Comments may truncate in portrait. Use landscape to avoid truncation.

C:\fs.hc.hctx.net\PSApps\CAD\PROD\IOSS\CAD\cad\vrpt
EventHistory_Event_Portrait

Page 1 of 3

4E86	C41565	A	Arrived	07/19/24 19:15:16	Auto-arriving with offset of 0 seconds.	TYSON.HAM
4E71	C41735	D	Dispatched	07/19/24 19:34:22	Stat/Beat: 4113;4E86	JOSED.AMA
4E71	C41735	E	En-Route	07/19/24 19:34:22	Stat/Beat: 4113;4E86	JOSED.AMA
4E71	C41735	AET	Auto Enroute Timesta	07/19/24 19:34:39	Current status is:E. Offset of 12 second	LIDIA.AMAY
84212	C41192	D	Dispatched	07/19/24 19:35:42		TODD.RITZ
84212	C41192	E	En-Route	07/19/24 19:35:42		TODD.RITZ
84212	C41192	AET	Auto Enroute Timesta	07/19/24 19:35:43	Current status is:E. Offset of 3 seconds.	TODD.RITZ
4E75	C41449	D	Dispatched	07/19/24 19:36:56	Stat/Beat: 4127	DARIUS.NE
4E75	C41449	E	En-Route	07/19/24 19:36:56	Stat/Beat: 4127	DARIUS.NE
4E75	C41449	AET	Auto Enroute Timesta	07/19/24 19:36:57	Current status is:E. Offset of 4 seconds.	DARIUS.NE
4E71	C41735	A	Arrived	07/19/24 19:40:18	Auto-arriving with offset of 0 seconds.	LIDIA.AMAY
84212	C41192	A	Arrived	07/19/24 19:42:50	Auto-arriving with offset of 30 seconds.	TODD.RITZ
84212	C41192	C	Cleared	07/19/24 19:43:24	[CBU]	TODD.RITZ
4E75	C41449	A	Arrived	07/19/24 19:43:42	Auto-arriving with offset of 0 seconds.	DARIUS.NE
84212	C41192	D	Dispatched	07/19/24 19:55:32		TODD.RITZ
84212	C41192	E	En-Route	07/19/24 19:55:32		TODD.RITZ
84212	C41192	A	Arrived	07/19/24 19:55:32		TODD.RITZ
84212	C41192	ENT	Entered Related Vehicl	07/19/24 20:02:22	1) MOTOR VEHICLE INFO	TODD.RITZ
84212	C41192	...	Entered Related Vehicl	07/19/24 20:02:22	2) [state:] TX	TODD.RITZ
84212	C41192	C	Cleared	07/19/24 20:11:36	[CBU]	TODD.RITZ
4E71	C41735	C	Cleared	07/19/24 20:14:50	[CBU]	LIDIA.AMAY
4E75	C41449	C	Cleared	07/19/24 20:39:10	[CBU]	DARIUS.NE
4E86	C41565	C	Cleared	07/19/24 20:40:07	ADV [ADV]	JENA.HARG

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
		TR	Time Received	07/19/24 19:08:18	By: PHONE		KAREN.RAM
		ENT	Entered Street	07/19/24 19:08:19	802 CYPRESSWOOD BOUGH		KAREN.RAM
		ENT	Entered Nature	07/19/24 19:08:29	CHILD CUSTODY DISP		KAREN.RAM
		ENT	Entered Remarks	07/19/24 19:09:05			KAREN.RAM
		ENT	Entered CallerName_C	07/19/24 19:09:10	JENNIFER		KAREN.RAM
		ENT	Entered CallerPhone	07/19/24 19:09:20	7133210397		KAREN.RAM
		FIN	Finished Call Taking	07/19/24 19:09:20			KAREN.RAM
		VEV	Viewed Event	07/19/24 19:09:34	User First Viewed Event CAD		JOSED.AMA
		GB	HCSO GENERAL BRO	07/19/24 19:09:35			JOSED.AMA
		ARM	Added Remarks	07/19/24 19:09:35			JOSED.AMA
		ENT	Entered AddSt	07/19/24 19:09:39	M110-E		JOSED.AMA
		VEV	Viewed Event	07/19/24 19:12:03	User First Viewed Event CAD		TRISTAN.M
		RSW	Reset Watchdog Timer	07/19/24 19:24:57	Units: 4E86 >>> 15Min.		JOSED.AMA
		LINK	Linked Events	07/19/24 19:33:28	1) Linked Events 2024-2335941(23) to		JOSED.AMA
		...	Linked Events...	07/19/24 19:33:28	2) 2024-2336112(237)		JOSED.AMA
		ARM	Added Remarks	07/19/24 19:33:28			JOSED.AMA
		VEV	Viewed Event	07/19/24 19:33:34	User First Viewed Event CAD		DEJA.LOVE
		ARM	Added Remarks	07/19/24 19:33:51	Notes sent from LAW event #20242336		JOSED.AMA
		ARM	Added Remarks	07/19/24 19:33:58			JOSED.AMA
84212	C41192	NCIC	QRY: Names	07/19/24 19:37:19	1) Unit:84212 LNAME= FNAME= DOB=		Unit:84212
84212	C41192	...	QRY: Names...	07/19/24 19:37:19	2) ID/DL OLN=TX S2SAgency		Unit:84212

		VEV	Viewed Event	07/19/24 19:38:19	User First Viewed Event CAD	IVY.CARLS
		CHG	Changed Street	07/19/24 19:38:35	802 CYPRESSWOOD BOUGH --> 802	IVY.CARLS
84212	C41192	NCIC	QRY: Names	07/19/24 19:38:40	1) Unit:84212 LNAME= FNAME= DOB=	Unit:84212
84212	C41192	...	QRY: Names...	07/19/24 19:38:40	2) ID/DL OLN=TX S2SAgency	Unit:84212
		ARM	Added Remarks	07/19/24 19:39:13		IVY.CARLS
		RSW	Reset Watchdog Timer	07/19/24 19:41:46	Units: 4E71,4E86 >>> 30Min.	TRISTAN.M
		RSW	Reset Watchdog Timer	07/19/24 19:57:43	Units: 84212,4E71,4E86,4E75 >>> 40Mi	JENA.HARG
		ARM	Added Remarks	07/19/24 19:57:51		JENA.HARG
		VEV	Viewed Event	07/19/24 19:57:55	User First Viewed Event CAD	JENA.HARG
84212	C41192	NCIC	QRY: Vehicles	07/19/24 20:02:21	1) Unit:84212 TAG=SGK9250 STATE=T	Unit:84212
84212	C41192	...	QRY: Vehicles...	07/19/24 20:02:21	2) (VesselRegNbr) VSLREG= S2SAgen	Unit:84212

Employee Info

Unit	Empl ID	Name
4E71	C41735	AMAYA, LIDIA
4E75	C41449	NEWSOME, DARIUS
4E86	C41565	HAMILTON, TYSON
84212	C41192	RITZ, TODD

Redaction Log

Total Number of Redactions in Document: 3

Redaction Reasons by Page

Page	Reason	Description	Occurrences
2	MOTOR VEHICLE INFO	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	1
2	ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	1
3	ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	1

Unofficial Copy Office of Marilyn Burgess District Clerk

Redaction Log

Redaction Reasons by Exemption

Reason	Description	Pages (Count)
ID/DL	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2(1) 3(1)
MOTOR VEHICLE INFO	The records are redacted in accordance with Section 552.130 of the Texas Government Code.	2(1)

Unofficial Copy Office of Marilyn Burgess District Clerk

COMMUNICATIONS

Event Report

Event ID: 2024-2336112

Call Ref #: 237

Date/Time Received: 07/19/24 19:27:09

Rpt #:

Prime
Unit:

Services Involved

Call Source: W911

LAW

Location: 802 CYPRESSWOOD BOUGH

M110-E

X-ST:

CYPRESSWOOD SPRINGS

Jur: CAD

Service: LAW

Agency: HCC4

St/Beat: 4064

District: B

RA:

Business:

Phone:

GP: 4464

Nature: CHILD CUSTODY DISP

Alarm Lvl: 1 Priority: 2

Medical Priority:

Reclassified Nature:

Caller: CHRISTOPHER

Addr: 802 CYPRESSWOOD BOUGH

Phone: (915) 834-9523

Alarm:

Alarm Type:

Vehicle #:

St:

Report Only: No

Race:

Sex:

Age:

Call Taker: BREANNA.TAYLOR

Console: PSHP0020

Geo-Verified Addr.: Yes Nature Summary Code:

Disposition: DUP

Close Comments:

Notes: CHRISTOPHER-915-834-9523 [07/19/24 19:33:51 JOSED.AMAYA]

Linked Events 2024-2335941(23) to 2024-2336112(237) [07/19/24 19:33:29 JOSED.AMAYA]

UDTS: NO HOLIST ASST RESP TEAM [07/19/24 19:32:03 BREANNA.TAYLOR]

CREP

REP ADV MOTHER OF GODCHILDREN WF JENNIFER GRANT UNK CLOTHING DESC IS OUTSIDE LOC FOR HER CHILDREN / REP ADV SUBJ HAS BEEN TRESSPASSED FROM PROPERTY BEFORE AND LOST CUSTODY OF CHILDRE/ UNK WEAP / UNK INTOX / UNK MHI / LASPE TIME UNK [07/19/24 19:31:55 BREANNA.TAYLOR]

Times

Call Received: 07/19/24 19:27:09

Time From Call Received

Call Routed: 07/19/24 19:32:04

000:04:55

Unit Reaction:

(1st Dispatch to 1st Arrive)

Call Take Finished: 07/19/24 19:32:04

000:04:55

En-Route:

(1st Dispatch to 1st En-Route)

1st Dispatch:

(Time Held)

On-Scene:

(1st Arrive to Last Clear)

1st En-Route:

1st Arrive:

(Reaction Time)

Last Clear:

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
		TR	Time Received	07/19/24 19:27:09	By: E911		BREANNA.T
		ENT	Entered Street	07/19/24 19:27:09	1009 B LEMM ROAD 1 -;SPRI		BREANNA.T
		VER	Verified Street	07/19/24 19:27:11	802 CYPRESSWOOD BOUGH		BREANNA.T
		DLS	Duplicate List	07/19/24 19:27:11	Potential Duplicate Events Listed (1		BREANNA.T
		ENT	Entered CallerName_C	07/19/24 19:27:31	CHRISTOPHER		BREANNA.T
		ARM	Added Remarks	07/19/24 19:31:55			BREANNA.T

ENT	Entered Nature	07/19/24 19:31:57	CHILD CUSTODY DISP	BREANNA.T
NOH	NO HOLIST ASST RE	07/19/24 19:32:03		BREANNA.T
ARM	Added Remarks	07/19/24 19:32:03		BREANNA.T
FIN	Finished Call Taking	07/19/24 19:32:04		BREANNA.T
VEV	Viewed Event	07/19/24 19:32:25	User First Viewed Event CAD	JOSED.AMA
CHG	Changed AddSt	07/19/24 19:32:29	ALT: 6 DIST: DIST: 20.74 FT --> M110-	JOSED.AMA
LINK	Linked Events	07/19/24 19:33:28	1) Linked Events 2024-2335941(23) to	JOSED.AMA
...	Linked Events...	07/19/24 19:33:28	2) 2024-2336112(237)	JOSED.AMA
ARM	Added Remarks	07/19/24 19:33:29		JOSED.AMA
ARM	Added Remarks	07/19/24 19:33:51		JOSED.AMA
ARM	Added Remarks	07/19/24 19:33:51	Sent to: Linked Events	JOSED.AMA
CAN	Event Cancelled	07/19/24 19:33:54		DUP JOSED.AMA

Unofficial Copy Office of Marilyn Burgess District Clerk

COMMUNICATIONS

Event Report

Event ID: 2024-2337214

Call Ref #: 592

Date/Time Received: 07/19/24 21:38:22

Rpt #:

Prime 4E75

Services Involved

Call Source: W911

Unit: NEWSOME, DARIUS

LAW

Location: 802 CYPRESSWOOD BOUGH

ALT: 4 DIST: DIST: 20.74 ft

X-ST:

CYPRESSWOOD SPRINGS

Jur: CAD

Service: LAW

Agency: HCC4

St/Beat: 4064

District: B

RA:

Business:

Phone:

GP: 4464

Nature: INFORMATION CALL

Alarm Lvl: 1 Priority: 3

Medical Priority:

Reclassified Nature:

Caller: CHRISTOPHER

Alarm:

Addr: 802 CYPRESSWOOD BOUGH

Phone: (915) 834-9523

Alarm Type:

Vehicle #:

St:

Report Only: No

Race:

Sex:

Age:

Call Taker: IVY.CARLSON

Console: PSHP0009

Geo-Verified Addr.: Yes Nature Summary Code:

Disposition: INF

Close Comments:

Notes: UDTs: NO HOLIST ASST RESP TEAM [07/19/24 21:41:16 IVY.CARLSON]
PUBLIC SERVICE// Rep would like to talk to unit 4E75/ rep adv they spoke earlier NREF EVENT 2024-2335941/ above loc is
reps home address [07/19/24 21:41:10 IVY.CARLSON]

Times

Call Received: 07/19/24 21:38:22

Time From Call Received

Call Routed: 07/19/24 21:41:18

000:02:56

Unit Reaction: 000:15:59 (1st Dispatch to 1st Arrive)

Call Take Finished: 07/19/24 21:41:18

000:02:56

En-Route: (1st Dispatch to 1st En-Route)

1st Dispatch: 07/19/24 21:43:46

000:05:24

(Time Held)

On-Scene: 000:02:31 (1st Arrive to Last Clear)

1st En-Route: 07/19/24 21:43:46

000:05:24

1st Arrive: 07/19/24 21:59:45

000:21:23

(Reaction Time)

Last Clear: 07/19/24 22:02:16

000:23:54

Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
4E75	C41449	AS	Assigned	07/19/24 21:41:36			KAREN.RAM
4E75	C41449	D	Dispatched	07/19/24 21:43:46	Stat/Beat: 4127		KAREN.RAM
4E75	C41449	E	En-Route	07/19/24 21:43:46	Stat/Beat: 4127		KAREN.RAM
4E75	C41449	AET	Auto Enroute Timesta	07/19/24 21:50:04	Current status is:E. Offset of 20 second		DARIUS.NE
4E75	C41449	A	Arrived	07/19/24 21:59:45			Unit:4E75
4E75	C41449	C	Cleared	07/19/24 22:02:16	[INF]	INF	DARIUS.NE

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments (may truncate in portrait)	Close Code	User
		TR	Time Received	07/19/24 21:38:22	By: E911		IVY.CARLS
		ENT	Entered Street	07/19/24 21:38:22	20100 A HOLZWARTH RD;HOUS		IVY.CARLS
		VER	Verified Street	07/19/24 21:38:25	802 CYPRESSWOOD BOUGH		IVY.CARLS
		VCH	Viewed Call History	07/19/24 21:38:28	Location Information		IVY.CARLS
		VCH	Viewed Call History	07/19/24 21:38:44	Location Information		IVY.CARLS
		CHG	Changed CallerName_	07/19/24 21:39:58	AT&T MOBILITY --> CHRIS		IVY.CARLS
		CHG	Changed CallerName_	07/19/24 21:40:05	CHRIS --> CHRISTOPHER		IVY.CARLS
		ARM	Added Remarks	07/19/24 21:41:10			IVY.CARLS
		ENT	Entered Nature	07/19/24 21:41:14	INFORMATION CALL		IVY.CARLS
		NOH	NO HOLIST ASST RE	07/19/24 21:41:16			IVY.CARLS
		ARM	Added Remarks	07/19/24 21:41:16			IVY.CARLS
		FIN	Finished Call Taking	07/19/24 21:41:18			IVY.CARLS
		VEV	Viewed Event	07/19/24 21:41:24	User First Viewed Event CAD		KAREN.RAM

Employee Info

Unit	Empl ID	Name
4E75	C41449	NEWSOME, DARIUS

R006093-020825 - Public Information Request

Message History (3)

✉ On 2/12/2025 11:25:51 AM, Harris County Constable Pct 4 Public Information Request Center wrote:

Subject: Public Information Request :: R006093-020825

Body:

RE: Public Information Request on February 08, 2025, Reference # R006093-020825

Dear Jennifer Grant,

You submitted a request to the Harris County Constable Precinct 4 on February 08, 2025 at 8:06 AM. Your request mentioned:

All records and reports, including body worn camera recordings, call-out slips, 911 Tapes and Dispatch Transcripts, Arrest Record / Jail Booking Blotter, Beat Report, Booking Photo, Calls for Service / Location Inquiry associated with 802 Cypresswood Bough, Spring, Harris County, Texas since 2018.

The Harris County Constable Precinct 4 has reviewed our files and located responsive records to your request. Some of the records have been redacted per public records law. Please log in to the Public Records Request Center at the following link to retrieve the responsive records.

[Public Information Request - R006093-020825](#)

For questions or additional information, please reply to this email.

Sincerely,

Records

✉ On 2/8/2025 8:06:37 AM, Harris County Constable Pct 4 Public Information Request Center wrote:



Dear Jennifer Grant:

Your request has been received and is being processed. Your request was submitted to this office on February 08, 2025 at 8:06 AM and given the reference number R006093-020825 for tracking purposes.

Records Requested: All records and reports, including body worn camera recordings, call-out slips, 911 Tapes and Dispatch Transcripts, Arrest Record / Jail Booking Blotter, Beat Report, Booking Photo, Calls for Service / Location Inquiry associated with 802 Cypresswood Bough, Spring, Harris County, Texas since 2018.

Your request will be assigned to a member of our staff who will locate the information you seek and determine the volume and any costs associated with satisfying your request. You will be contacted about the availability and/or provided with copies of the records in question on or before 2/25/2025 8:00:00 AM.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed.

Harris County Constable Precinct 4

To monitor the progress or update this request please log into the [Public Records Request Center](#)



✉ On 2/8/2025 8:06:35 AM, Jennifer Grant wrote:

Request Created on Public Portal

Unofficial Copy Office of Marilyn Burgess District Clerk

Houston Police Department

0047579-24

Production



Houston Police Department
1200 Travis Street
Houston, Texas 77002
713-884-3131 Emergency Dial 9-1-1

Reported Date/Time
01/10/2024 15:55
Offense Report Title
Terroristic Threat by Other Means (T)
Officer Name
JEFFERSON, M D

Administrative Information

Address 407 FANNIN ST				City HOUSTON	Zip
Dist/Beat 1A10	Station SO	District 01	From Date/Time (01/10/2024 15:55)	To Date/Time	Primary Unit 2Y51E
Officer 1 Name JEFFERSON, M D				Division Downtown - Evenings - Patrol	
Officer 2 Name				Division	
Weather CLEAR	Offense County Harris County			Est. Loss Value None or Not Applicable	
Hate Crime No	Family Violence No	Metal Theft No	Gang Crime No		

COM: RUNYON, KRISTOPHER DAMON

Race White or White Hispanic	Sex Male	Ethnicity Not Hispanic/Latino (N)	Height 5'09"	Weight 200#	Age 36
Address 802 CYPRESSWOOD BOUGH			City SPRING	State TX	Zip Code 77373
Phone(s): CE (915)834-9523					

Summary

THREAT TO LIFE
1 COMPLAINANT
1 SUSPECT

STATE OF TEXAS
COUNTY OF HARRIS

I, J. Noe Diaz Jr., Chief of Police, Houston, Texas do hereby certify that the foregoing is a true and correct copy of the original record, now in the lawful custody and possession of the Houston Police Department.

Witness my official hand and seal of office, this, the 15 day

of 1, 2024

By [Signature] Records Division

Report Officer JEFFERSON, M D	Printed At 01/15/2025 01:24	Page: 1 of 1
----------------------------------	--------------------------------	--------------



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this March 11, 2025

Certified Document Number: 119329031 Total Pages: 39

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

CAUSE NO. 2025-13614

JENNIFER A. GRANT, INDIVIDUALLY, §
AND AS NEXT FRIEND OF §
A.J.S. and A.L.S., MINORS §

Plaintiff §

VS. §

MISTY DAWN RUNYON, §
KRISTOPHER DAMON RUNYON, §
MICHAEL AUSTIN KROCKER, §
BOE LYNN BOWEN, Individually and §
in his official capacity for, §
THE BOWEN LAW FIRM, PLLC, §
DONNA RENEE WITCHER, §
ENCORE LEGAL PROCESS, INC., §
RANDEE LYNN SOBEL, §
REBA BEDFORD (AKA REBA PETITTO), §
BELINDA PUNTANEN (Individually §
and as next friend of Z.R.M., Minor), §
SAMANTHA JAYE HARRIS, §
THE LAW OFFICE OF §
SAMANTHA J. HARRIS, PLLC, §
BRENDA TAFT EDWARDS, §
ROBYN ELISE SEGAL, §
MADELINE DIANNE RUNYON, §
SAVANNAH SKY RUNYON, §
SIERRA HOPE STEVENS-DREWS, §
ROBERT S. SOBEL (DECEASED), §

DEFENDANTS §

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

151ST JUDICIAL DISTRICT

EXHIBIT 3

Plaintiff's Letter to Texas Medical Board

November 1, 2024

Texas Medical Board
P.O. Box 2018
Austin, Texas 78768-2018

Via email: es.response@tmb.state.us

RE: File # 25-0978

Dear Madam or Sir:

My name is Jennifer Grant. My date of birth is December 22, 1977. It has come to my attention that a complaint, assigned the above referenced file number, was made against Dr. N [REDACTED] P [REDACTED] alleging that Dr. P [REDACTED] and I are having a sexual relationship, that I am his patient, and that he is providing me with legal opinions regarding the assets of my spouse.

I categorically deny those malicious allegations.

First, I am **not** married. Second, I have **never** been a patient of Dr. P [REDACTED]. Third, I am a legal professional of twenty (20) years. Fourth, multiple attorneys represent me currently. Fifth, Dr. P [REDACTED] has **never** provided me with his legal opinion, nor would I seek it for the obvious reasons mentioned. (If anything, Dr. P [REDACTED] has looked to me for *my* legal opinion on rare occasions).

Allow me to provide you with a brief history of my relationship with Dr. P [REDACTED]. We met in late December of 2019 through a dating website. When we began dating, I had been divorced for almost three years. We have been in an exclusive long-term relationship for a majority of the time since then and have lived together since Spring of 2023.

Based upon the limited information provided regarding the patently false complaint allegations, I strongly suspect the complaint was maliciously filed either by Belinda Puntanen a/k/a Angel Hastings, my tenant who I filed an eviction proceeding against for nonpayment of rent and other violations, and who was also recently terminated by me and the Board of Directors of Resolve for Justice Foundation, a nonprofit I founded. Furthermore, evidence from other litigation I am embroiled in points to potential collusion between Ms. Puntanen and other adversarial parties who

may have filed the complaint either at the behest of Ms. Puntanen or from malicious lies she may have told them – either Misty Runyon, Brenda Edwards or Randee Sobel. Toward that end, I would appreciate it if the Texas Medical Board could confirm whether my suspicions are correct so that I may notify my attorneys accordingly.

Very simply, in the course of eviction proceedings, I learned Ms. Puntanen has a significant history involving her extensive abuses of the legal process, defrauding other people and agencies, and numerous criminal charges in at least three states. In fact, more than twenty (20) cases have been filed against her since 2002 variously for eviction, foreclosure, financial frauds, DWI, and physical assaults resulting in orders for permanent injunctions against her for Unauthorized Practice of Law in six (6) different cases and a protective order granted against her in an altogether unrelated case. Additionally, Ms. Puntanen is currently under multiple criminal investigations, and I am actively working with other attorneys to have her formally declared as a vexatious litigant.

No information was given as to the allegation(s) made under the general statutory violation of 164.053(a)(6) for me to adequately respond. However, having reviewed the statutes cited for the complaint, I emphatically assert that Dr. P [REDACTED] **has never prescribed, administered, or dispensed to me any:**

“(A) *dangerous drugs as defined by Chapter 483, Health and Safety Code, or*

“(B) *controlled substances scheduled in Chapter 481, Health and Safety Code, or the Comprehensive Drug Abuse Prevention and Control Act of 1970 (21 U.S.C. Section 801 et seq.)*”

Although the complaint against Dr. P [REDACTED] is unfounded and most certainly made with malicious intent, I convey my appreciation for the Texas Medical Board's necessary evaluation in its statutory service for the purpose of ensuring the safety and protection of the public health. I thank you for that. Undoubtedly, the Board is burdened with many serious, legitimate complaints, and I imagine its resources are better directed toward evaluating and investigating those matters. Nonetheless, should you have any questions, or require further information, you may contact me or one of my attorneys I copied at their respective email address below.

Very truly,




Jennifer A. Grant,

CEO | Executive Editor | Consultant | Lobbyist (*Public Safety & Community Services*)
jen@texasfirecracker.com | catalyst@resolvejustice.org

Texas Medical Board

November 1, 2024

Page 3 of 3

cc: Jon Hill (Via email: [REDACTED])

Mayra Mora (Via email: [REDACTED])

Brock Akers (Via email: [REDACTED])

Unofficial Copy Office of Marilyn Burgess District Clerk



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this March 11, 2025

Certified Document Number: 119329032 Total Pages: 4

Marilyn Burgess

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

Unofficial Copy Office of Marilyn Burgess District Clerk

In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

CAUSE NO. 2025-13614

JENNIFER A. GRANT, INDIVIDUALLY, §
AND AS NEXT FRIEND OF §
A.J.S. and A.L.S., MINORS §

Plaintiff §

VS. §

MISTY DAWN RUNYON, §
KRISTOPHER DAMON RUNYON, §
MICHAEL AUSTIN KROCKER, §
BOE LYNN BOWEN, Individually and §
in his official capacity for, §
THE BOWEN LAW FIRM, PLLC, §
DONNA RENEE WITCHER, §
ENCORE LEGAL PROCESS, INC., §
RANDEE LYNN SOBEL, §
REBA BEDFORD (AKA REBA PETITTO), §
BELINDA PUNTANEN (Individually §
and as next friend of Z.R.M., Minor), §
SAMANTHA JAYE HARRIS, §
THE LAW OFFICE OF §
SAMANTHA J. HARRIS, PLLC, §
BRENDA TAFT EDWARDS, §
ROBYN ELISE SEGAL, §
MADELINE DIANNE RUNYON, §
SAVANNAH SKY RUNYON, §
SIERRA HOPE STEVENS-DREWS, §
ROBERT S. SOBEL (DECEASED), §

DEFENDANTS §

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

151ST JUDICIAL DISTRICT

EXHIBIT 4

Attorney Schnebly's Demand Letter



MARIA L. SCHNEBLY

Attorney at Law

4402 Richmond Avenue, Suite 109

Houston, Texas 77027

(713) 961-1750 Telephone

(713) 963-8271 Facsimile

saucedo_law@yahoo.com

April 30, 2023

Mr. Michael Austin Krockner
Bowen Law Firm, PLLC
13103 FM 1960 Road West
Suite 216
Houston, Texas 77065

Via Email to: mak@bowenlf.com

Via Email to: famlawservice@bowenlf.com

Via Email to: bowenlawfirm@bowenlf.com

Via Email to: mak@bayoucityfamilylaw.com

Mr. Michael Krockner
802 Cypresswood Bough
Spring, Texas 77373

Via personal delivery

Mr. Michael Krockner
1503 Palisade Green Dr.
Katy, Texas 77493

Via personal delivery

Mr. Boe Lynn Bowen
14202 Champion Forest Dr.
Suite 101
Houston, TX 77069

Via Email to: boe@bowenlf.com

Via Email to: bowenfamlaw@bowenlf.com

Via Email to: bowenlawfirm@bowenlf.com

Via Email to: famlawservice@bowenlf.com

The Bowen Law Firm, PLLC
ATTN: Mr. Boe Lynn Bowen
11503 Leaning Pine Dr.
Houston, Texas 77070

Via personal delivery

RE: Cause No. 2016-22196; *In the Interest of Angelina Justice Sobel and Alexander Lane Sobel, Minor Children*; In the 245th Judicial District Court of Harris County, Texas

Gentlemen,

This communication is being directed to both of you for a multitude of reasons. Based upon the numerous differing contact information from that of your communications, pleadings, the

Mr. Michael Austin "MAK" Krocker, and
Mr. Boe Lynn "Boë" Bowen
April 30, 2023
Page 2 of 3

record from the official court reporter in the above referenced matter, the State Bar of Texas, recent filed pleadings from each of you, independent research, and given the very high stakes of the matter involving my client, Jennifer Grant, out of an extreme abundance of caution, I am directing this communication to every address indicated above.

As I am sure you are all aware, I represent Jennifer Grant in the above-referenced case filed by Mr. Michael Krocker, of Bowen Law Firm, PLLC. As you should also be aware, my client firmly believes, and I agree, that your clients lack the requisite standing to bring their suit to modify. Furthermore, based both upon your failure to serve my client with citation in accordance with either the Texas Rules of Civil Procedure, or in accordance with sections 102.009-102.0091 and 156.003 of the Texas Family Code, and your clients' lack of standing under sections 102.003 and 156.002 of the Texas Family Code, it is our position that any orders obtained on your clients' behalf are void and/or voidable.

I am in receipt of your clients' Motion for Judge to Confer with Children, the Notice of Court Proceeding advising that the motion will be considered by submission on May 8, 2023, and your proposed order. Please be advised that my client objects to your motion and has instructed me to file a jury demand on her behalf on Monday, May 1, 2023, which I believe forecloses your notice of submission and obviously, the motion itself.

Additionally, because of your refusal to dismiss your case, to file a motion to withdraw and are now necessary fact witnesses, my client has instructed me to file a motion to disqualify both of you, individually, and the Bowen Law Firm, PLLC (aka The Bowen Law Firm, PLLC), from further representation.

Furthermore, based upon the prima facie evidence before the Court that my client was not served, which proves that the "Default Temporary Orders in Suit Affecting the Parent-Children Relationship" were wrongfully obtained, my client is now forced to incur additional attorney's fees and will be filing a petition for writ of mandamus immediately to include a request for emergency temporary relief staying the trial court proceedings until the mandate has been issued regarding both your failure to serve her and based upon your clients' lack of standing. It is expected that the trial court will be mandated to void the orders and likewise to strike your clients' petition.

Please note I have reviewed both the record and the law applicable to this matter, and I concur with her course of action. Furthermore, I concur that you have necessarily become fact witnesses in the trial court for reasons which include my concern that I do not believe Mr. Krocker is actually practicing law out of the home where Mr. and Mrs. Runyon reside with my client's children, which leads one to believe Mr. Krocker now lives there. Regardless, Mr. Krocker, you are definitively now a fact witness involving these matters and your withdrawal is mandatory. Your failure to withdraw despite repeated requests has necessitated my client to unnecessarily incur additional attorney fees and she will seek recovery of those as well.

Mr. Michael Austin "MAK" Krockner, and
Mr. Boe Lynn "Boë" Bowen
April 30, 2023
Page 3 of 3

As an aside, I find your professional course of action thus far both astounding and in the poorest of taste. The awful circumstances of the subject children were known by your clients prior to Mr. Sobel's death, but they failed to take appropriate action when they should have then. Choosing to act only after Mr. Sobel had passed away, based upon a dubious (at best) will purportedly executed by him, is highly suspicious – particularly, taken together in consideration of all the other known facts about Mr. and Mrs. Runyon and their associates. Ms. Grant has already been found to be a fit parent by the trial court, and yet, your clients sought to steal custody from a mother while she was in a coma, to interfere with a doctor's opinion that her daughter needed inpatient treatment and have continued to withhold the children from her. I cannot imagine that the trial court will look very favorably upon either of your clients, nor you, Mr. Krockner, for any of these actions.

My client has been very direct about her intentions and has stated that she will pursue every available legal remedy, but I believe she can be persuaded against seeking professional recourse if her children are immediately returned and her expenses paid. I strongly encourage you both to contact me right away to arrange for the return of her children to her custody.

Lastly, you are to instruct your clients that they are not to spend any monies they have wrongfully obtained or received on the children's behalf and that they will be required by multiple courts to provide a full accounting of all monies received and spent.

Very truly yours,

/s/ Maria L. Schnebly

Maria L. Schnebly

MLS/

cc: Jennifer Grant (via email to jennifer@quantumlegalsupport.com)



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this March 11, 2025

Certified Document Number: 119329034 Total Pages: 4

Marilyn Burgess

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com