

Re: Request for Help. Case No. 0013245588.

Ken Paxton
Texas Attorney General

Tel. (512)936 0680

I respectfully request the Texas Attorney General, Ken Paxton, to withdraw the motion and law suit for enforcement of child and medical support orders filed on the 92nd District Court, on the ground that the support orders were obtained by fraud on the 92nd District Court; on the ground that the law suit is seeking to enforce the fraudulent orders by incarceration; on the ground that because of my life-threatening Electrohypersensitivity, incarceration is for me a death sentence; on the ground that the Assistant Texas Attorney General, Norma Ortiz, filed the law suit for enforcement of support orders by incarceration knowing that the support orders were obtained by fraud on the 92nd District Court; knowing that for several years, I have been home bound with a painful, debilitating, and life-threatening Electrohypersensitivity, EHS; knowing that my EHS is aggravated by the electricity inside buildings and that incarceration is for me a death sentence; and on the ground that the attempts to enforce the fraudulent support orders by incarceration is retaliation for denouncing how evidence on the record has proven as a matter of law the collusion of the former Texas Attorney General, and now, governor of Texas, Greg Abbott with school officials and with members of the judiciary in falsification of government records, perjury, fabrication of testimony and of other evidence, and in disability discrimination and retaliation to prevent expert evaluations for treatment of the pain and suffering that my children feel when exposed to wireless radiation; to conceal that the radiation exposures at school are causing children EHS, and brain, eye, blood, and DNA damage and other severe physical harm that defeats the purpose of education; to conceal that the same radiation reaching children at school has caused harm to teachers, to fire fighters, to police officers and to other adults; and to conceal that these radiation exposures are

increasing by 500 percent the childrens risk of cancer,, and by 450 percent the risk of dying to children suffering of life-threatening illnesses; and to conceal that the radiation exposures at school are responsible for the poor academic performance,, for the increasing number of visits to the school nurse, for the increasing number of student and teacher absences for health reasons, for the increasing number of children suffering of learning and behavioral impairments,, for the increasing number of children collapsing in class and committing suicide,, and for the increasing number of children suffering of life-threatening and of terminal illnesses; to conceal that the switch from wired to wireless Internet in schools was not to improve education, but for private enrichment; to conceal that the lowering of academic requirements and testing was not to improve education, but to conceal the harm being caused on our childrens brains and bodies by the radiation at school; to conceal that taking advantage of the pervasive corruption in this area of the country, the Obama Administration has chosen our children to start an extremely dangerous and suicidal experiment bound to cause harm to this generation and to generations to come; and to conceal that the future of our children and of our national security are being sold to the wireless lobby as detailed on the attached Amended Answer to motion and law suit to enforce the fraudulent support orders, and on the sworn Complaint of Violation of Civil Rights submitted to the Special Prosecutions Division in Austin, Texas, and to the FBI Public Corruption Task Force and posted at:
www.gangstalkinghelp.org/mendoza

Your prompt attention to this matter is highly appreciated. Should you have questions or need more evidence,, I will be happy to oblige.

Respectfully submitted:

Jesus Mendoza
Jesus Mendoza

2202 E. 28th St. Mission, Texas 78574 Tel. (956)519 7140

Silvia Galvan
v.
Jesus Mendoza

IN THE DISTRICT COURT

92nd JUDICIAL DISTRICT

And in the Interest of
Kimberley V. Mendoza,
Ivan B. Mendoza,
Karina I. Mendoza

HIDALGO COUNTY, TEXAS

The State of Texas v. Jesus Mendoza

Jesus Mendoza v. Ken Paxton

AT 11 O'CLOCK 11 M

MAY 09 2016

LAURA MENDOZA, CLERK
District Court, Hidalgo County

Respondent Jesus Mendoza Amended Answer to Petitioners' Motion for Enforcement and Suit for Modification of Support Order and General Denial; Third Party Amended Petition against Defendant the Texas Attorney Ken Paxton; Request for Disclosures; Request for Jury Trial; and Affidavit to Proceed without Payment of Fees and Costs.

I, Jesus Mendoza, Pro-se Respondent, respectfully files this Amended Answer, General Denial, Affirmative Defenses, Third Party Petition, and Request for Jury Trial, and Request for Disclosures to Petitioner, the State of Texas Motion for Enforcement and Suit for Modification of Support Order and Order to Show Cause filed by the Texas Attorney General in this Court on Feb. 29, 2016, and served on myself on March 8, 2016.

DECLARATION

→ that I am competent to make this Declaration and

I, Jesus Mendoza, declare under penalty of perjury that the facts stated in this Answer are within my personal knowledge and are true and correct; that the pictures submitted in support of this Answer are a true and exact copy of the originals; that the medical records submitted in support of this Answer are a true and exact copy of the records that I received from my doctors; and that the official documents submitted in support of this answer, are a true and exact copy of the documents that I received from official entities.

*Jesus Mendoza 8 May 2016
2202 E. 28th St. Mission, TX 78578 Tel. (956) 519-7140*

The last three digits of my Texas drivers license are 8068, and the last four digits of my Social Security number are 8796.

GENERAL DENIAL

I deny each and all of Petitioner's Motion for Enforcement and Suit for Modification of Support Order; I request strict proof of each and all of Petitioner's allegations; and I request the Court to deny each and all relief sought by Petitioner.

AFFIRMATIVE DEFENSES

Voluntary relinquishment of possession plus actual support; inability to comply; and unenforceable child and medical support orders.

VOLUNTARY RELINQUISHMENT AND CONTROL PLUS ACTUAL SUPPORT PURSUANT TO TEXAS FAM. CODES 157.007, 157.008.

During the divorce proceedings, my ex-wife, Silvia Galvan agreed to pay rent if she stayed in my home, which is not community property. Reporters' Record, Vol. 6, pgs 19,20.

After the divorce, my ex-wife stayed with my children in my home, without paying rent or property taxes. I owe more than \$4,000 in back property taxes that accrued mostly after the divorce.

I am still with my children as before the divorce, where I provide for my children to the best of my ability.

In most cases, my ex-wife leaves my children with me after school, and until my children go to sleep. On most cases, during the Summer and on weekends, my ex-wife leaves my children with me until late at night.

The periods of relinquishment have and are exceeding the alleged 24-hours of possession, as described on the Final Decree of Divorce, Clerk's Record dated Jan. 27, 2015, 284 (Orig. Clk's R. hereon)

In re M.P.M., 161 S.W.3d 650, 656 (Tex.App. - San Antonio 2005, no pet.); In re A.M., 192 S.W.3d 570,574 (Tex. 2006); In re S.L.M., 97 S.W.3d 224, 236-37 (Tex. App. - Amarillo 2002, no pet.)

INABILITY TO COMPLY UNDER TEXAS FAM. CODE SECTION 157.008(c).

I lack and lacked the ability to comply with the alleged child and medical support orders; I did not have, and I do not have property that could be sold, mortgaged or pledged to raise funds to pay the alleged support orders; I did not have, and I do not have the means to borrow money; and I did not know, and I do not know of a source where money could have been borrowed or legally obtained.

At no time, during the divorce proceedings, my ex-wife claimed that I have the ability to pay support minimum wage.

Specific, concrete, and undisputed evidence on the record has proven as a matter of law my inability to comply with the alleged support orders.

During the divorce proceedings, my ex-wife testified that I work very little, and that I make around \$100 per month. Reporters' Record, Vol. 3, pg 13.

During the divorce proceedings, my ex-wife's attorney, Mr. Abel Hinojosa admitted the seriousness of my health condition, and withdrew his request for child support stating:
"Judge, I know child support is going to be difficult for him to pay. I don't want to set up anybody to fail." Reporters' Record Vol. 3, pg 59.

During the divorce proceedings, my ex-wife admitted testifying before a federal Court and before a State agency to the legitimacy of my health condition, Electrohypersensitivity. Respondents' Response to a Request for Admissions, Admissions 107,172,174; Clerks' Record dated April 10, 2015, 93,96. (2nd Supp to Clks' R. hereon)

I am suffering of a painful, debilitating, and life-threatening Electrohypersensitivity, EHS, and of Chemical Hypersensitivity, CHS, neurological-immunological medical health conditions. Exposure to the radiation emitted by power lines, electric transformers and motors, fluorescent lights, video display screens, cell phones and towers, wireless computers, radar and other types of radiation cause among other things, swelling of vital organs, and of face, head and eyes; rashes, internal bleeding, and breathing, hearing, speech and concentration problems. Some chemicals and odors cause some of the same effects. I have been violently ill several times. I am in pain all the time. I use oxygen during crisis. Everyday is a different nightmare. With exception of some walks around the neighborhood during the year 2011, and walks to the next-door neighbors, I have been home bound since March 30, 2011. I can be inside my home only for a few minutes at a time, and to ameliorate some of the effects of radiation exposure, I stay most of the time in a metal room placed in the middle of the lot, and most of the time I use aluminum shielding of the thoracic area. At times, I use a leaded vest, and shielding of head at night. See doctor's letter describing my EHS and CHS, and how the radiation inside buildings can aggravate my life-threatening Electrohypersensitivity. Orig. Clk's R. 32,33,246,247. 2nd Supp to Clk's R. 102.

See the Physician Statement of Disability issued by the Texas Dept. of Aging and Disability Services and signed by my doctor stating as medical diagnosis "Highly sensitive to electricity" and describing some of the major life activities and functions substantially limited when exposed to radiation, including receptive and expressive language, learning, mobility, capacity for independent living, and economic self-sufficiency, Orig. Clk's R. 31,247; 2nd Supp Clk's R. 101. Appendix 7 to Motion to Appear by phone, filed in this Court on April, 11, 2016.

The Social Security Administration has found my electromagnetic sensitivity a severe impairment. Orig Clk's R. 36; 2nd Supp Clk's R. 103.

See pictures of some of the effects caused by exposure to radiation, including rashes, loss of skin, eye and facial swelling and how the swelling inside the skull is pushing an eye out of its socket; and pictures of the facial swelling caused by the radiation emitted by the speaker of the handset of a land-line telephone after a 2-hour hearing in federal Court on my motion to compel officials of the Sharyland Ind. School District to follow the doctors' directions and not seat my children directly under the light or in close proximity to sources of radiation, and in which an expert in radiation exposures at school testified that my children inherited my EHS, and that the swelling, black spots and bloody lines on my children's eyes were caused by the radiation at school, Orig. Clks R. 34, 35; Appx. 13 to Motion to Appear to Court by phone, Id.

I have a medical history of life-threatening swelling of heart caused by exposure to the same radiation found inside buildings, Appendixes 1B, 1C, 1D, 1E, 1F, to Motion to Appear to Court by phone, Id

Federal and State agencies and Court have recognized my EHS as a medical condition and as a disability. See Motion to Appear by Telephonic Conference to Judicial Proceedings as accommodation to my EHS and Court Order granting the Motion, Appx. 1, 1A, 1B, Id.

My Request for Review to the Office of the Texas Attorney General includes medical documentation and pictures of the legitimacy of my EHS, and describes how the Texas Dept. of Aging and Disability Services provides financial assistance to purchase equipment to accommodate my EHS; how the Texas Dept. of Human Services provides me with food stamps and a meal a day; how the University of Texas Rio Grande provides access and help by phone; how the Mission Police Dept. allows me to make police reports by phone; how Women's Together, the City of Mission Victims Liason and the Valley Association for Independent Living have provided accommodations to my EHS; and how some federal and State agencies have promised to avoid exposing unnecessarily my children and myself to

aircraft radiation when conducting operations in areas around my home.

My Request for Review to the Office of the Texas Attorney General includes my income statements describing that on most cases, I make less than \$100 per month working self-employed at home.

After I submitted the Request for Review, and explaining how the support orders were obtained by fraud on the Court, 3 times, agents of the Office of the Attorney General promised me that they were to file a motion to reduce the support orders to zero or to the amount I was making.

Instead, the Texas Attorney General filed in this Court a Motion for Enforcement and Suit for Modification of Support Order, and obtained a Court Order compelling my personal appearance to Court under penalty of arrest or default judgment or both, and seeking incarceration as contempt, knowing of my inability to comply with the alleged support orders; knowing that appearing in person to Court is bound to aggravate my life-threatening Electrohypersensitivity; knowing that a jail sentence is for me a death sentence; and knowing that the support orders were obtained by fraud in this Court.

Third Party Petition

I respectfully request the Court an Order compelling Defendant, the Texas Attorney General, Ken Paxton to declare that the orders of child and medical support he is attempting to enforce, were obtained by fraud on the 92nd District Court; and to compel Defendant Paxton to cease and desist his attempts to enforce the Orders on the Final Decree of Divorce; and to cease and desist from his attempts to conceal the legitimacy of EHS as a disability and medical health condition; and to cease and desist his retaliation against my children and against myself.

JURISDICTION

This Court has jurisdiction over Defendant Paxton. Sovereign immunity does not bar a suit for an official's ultra vires act, when as in this case, Defendant Paxton is being sued in his official capacity as Texas Attorney General and only for prospective and declaratory relief; when Defendant Paxton refused to perform a ministerial act, to recognize and accept that undisputed and undisputable evidence on the record has proven as a matter of law that the support orders that he is attempting to enforce by incarceration were obtained by fraud on the 92nd District Court; when Defendant Paxton is acting without legal authority to enforce by incarceration support orders that were obtained by fraud on the Court when incarceration is bound to cause me a painful death; when Defendant Paxton knows of my inability to comply with the fraudulent support orders; and when Defendant Paxton's attempts to enforce support orders obtained by fraud on the Court are part of attempts to conceal the legitimacy of EHS as a medical condition and disability, and part of an ongoing retaliation against my children and against myself for denouncing fraud on the Courts to conceal the harm being caused on my children and on other children by the wireless radiation at school, and when Defendant Paxton is acting without legal authority to violate the Texas Constitution Articles 8, 13, and 19. See Texas Dept. of Ins. v. Reconveyance Services, 306 S.W.3d 256, 258 (Tex. 2010); City of El Paso v. Heinrich, 284 S.W.3d 366, 380 (Tex. 2009); Creedmore-Maha Water Supp. v. Texas Comm. on Env'tl Quality, 307 S.W.3d 505, 515 (Tex. App. - Austin 2010); Director of Dept of Agric. & Env't Printing Indust., 600 S.W.2d 264, 265-66 (Tex. 1980); Cobb v. Harrington, 190 S.W.2d 709, 712 (Tex. 1945); Kubosh v. City of Houston, 2 S.W.3d 463, 469 (Tex. App. - Houston 1st Dist. 1999).

Specific, concrete, and undisputed evidence on the federal record has proven as a matter of law that the former Texas Attorney General, and now governor of Texas, Greg Abbott, through his attorneys and agents, to conceal the legitimacy of EHS as a medical condition and disability, and to deny my application for a doctor's recommended shielding room for rehabilitation of my Electrohypersensitivity, removed from the administrative record among other evidence, a Decision of the Social Security finding my electromagnetic sensitivity a severe impairment; Affidavits of persons attesting to my mental stability and to my reactivity to exposure to radiation; excerpts of an interview in which the then President of the World Health Organization declares her sensitivity to electricity; and pictures showing swelling of face and how the swelling inside the skull is pushing an eye out of its socket. Also, undisputed evidence on the State record has proven as a matter of law that Abbott allowed a counselor to fabricate an administrative record and to attest falsely under oath that the record was created during my interview to deny another application for a doctor recommended shielding room for rehabilitation of my EHS. Unopposed Motion to Recuse U.S. District Judge, Randy Crane, Mendoza v. Moron, Case No. M-05-184 (S.D. TX. 2005), Docket 25; Mendoza v. the Texas Dept. of Assistive and Rehabilitative Services, 345th District Court, Travis County, Texas, Cause No. D-11-GN-09-002538; Sections 10-14 of the Complaint of Violation of Civil Rights submitted to the FBI Public Corruption Task Force, and to the Special Prosecutions Division in Austin, Texas and posted at: www.gangstalkinghelp.org/mendoza Criminal Complaint hereon

Conclusive evidence on the record has proven the collusion of Abbott and Judge Crane in falsification of government records, fabrication of testimony and of other evidence, in disability discrimination and retaliation, and in fraud on the federal Court to conceal the legitimacy of EHS as a medical condition and disability, and to deny me a doctor recommended shielding room for rehabilitation of my EHS. Id.

Specific, concrete, and undisputed evidence on the record has proven as a matter of law that in retaliation for denouncing their attempts to conceal that the same radiation reaching my children at school has caused harm to teachers, to fire fighters, to police officers and to other adults, and is increasing by 500% the risk of cancer on children, and increasing by 450% the risk of dying to children suffering of life-threatening illnesses, and is causing children EHS, and brain, eye, blood and DNA damage and other severe harm that defeats the purpose of education:

Officials of the Sharyland Ind. School District refused to follow the doctors' directions to seat my children not directly under the light or in close proximity to sources of radiation; refused to transfer my children to another school; and seated my children closer to sources of radiation. Docket 101, Sharyland et al., Id.; Criminal Complaint Sections 1-4, Id. One of my children cried in pain almost every day when she was seated in close proximity to sources of radiation, Id.

SISD officials manipulated my then wife to testify falsely in federal Court on a hearing on my motion to compel SISD officials to follow the doctors' orders, that my children are healthy children. Id, Id. During the hearing, SISD officials did not deny their failed attempts to persuade my the wife to impeach my mental stability in Court, saying instead that they were not claiming that I was mentally insane, but that I did not have the right to represent my children Pro-se in Court. Id.

During the divorce proceedings before this Court, my ex-wife admitted to her perjury before the federal Court. Admissions 95-100, 2nd Supp to Clks R. 92,93. See the letters of my childrens pediatrician, Orig. Clks R. 47,248,249; 2nd Supp Clks R. 104.

As part of the retaliation to conceal the harm being caused on my children and on other children by the radiation at school, U.S. District Chief Judge, Ricardo H. Hinojosa, and U.S. Magistrate, Peter E. Ormsby substituted the testimony of an expert in radiation exposures in school for the testimony of my ex-wife, despite of undisputed evidence on the record proving that her testimony was false; and refused to consider undisputed evidence on the record proving SISD officials falsification of records, and more than 7/ acts of perjury to the Court to conceal the harm being caused on children by the radiation at school, and to conceal the disability discrimination and retaliation against my children and against myself. Docket 101, Sharyland et al, Id; Criminal Complaint Section 5.

Both, Chief Judge Hinojosa and Judge Ormsby recused themselves from the case against SISD officials in response to a federal law suit detailing their irrational cruelty towards children and their collusion with SISD officials and others to conceal the harm being caused on children by the radiation at school. Dockets 105,106, Sharyland ISD, et.al; Mendoza v. Hinojosa et al, Docket 114, Case No. 11:14-cv-30 (S.D. TX. 2014); Criminal Complaint section 5.

After the case against SISD officials was reassigned to Judge Crane, Judge Crane refused to recuse himself from the case against SISD officials despite of conclusive evidence on the record proving his collusion with Greg Abbott in fraud on the Court to conceal the legitimacy of EHS as a medical condition and as a disability; and despite that evidence indicates that Judge Crane participated on the decision to make of the McAllen Ind. School District the first large school district in the country to place into its schools more than 25,000 wireless devices, and on the decision to lower the academic requirements to conceal the harm being caused on our children's brains and bodies by the wireless radiation at school. Criminal Complaint Sections 23-25.

Judge Crane refused to consider conclusive evidence proving the irrational cruelty towards children of Chief Judge Hinojosa and Judge Ormsby, and their collusion with SISD officials in fraud on the Courts to conceal the harm being caused on children by the radiation at school, and dismissed the case seeking to compel SISD officials to follow the doctors' orders, to transfer my children to another school, and to notify parents of children suffering of illnesses of the radiation hazards inside my children's elementary school. Docket 108, Sharyland ISD et al; Criminal Complaint Sections 23-25.

U.S. District Judge, Micaela Alvarez to prevent that school officials inform parents of the harm caused on children by the wireless radiation at school; to prevent a federal evaluation of school children suffering of EHS, found in essence that despite Chief Judge Hinojosa and Judge Ormsby irrational cruelty towards children, and despite of arbitrary and vengeful retaliation against my children and against myself; and despite of the fraud on the Courts to conceal the harm being caused on children by the wireless radiation at school, the Defendants were immune from suit abrogating decades of State and federal precedent, and abrogating the statutory and Constitutional protections of millions of parents and children. Criminal Complaint Section 26.

Specific, concrete, and undisputed evidence on the record has proven as a matter of law that to conceal the fraud on the Courts to conceal the harm being caused on children by the radiation at school; to conceal my ex-wife's family violence and her perjury before the Courts to conceal the aggravation of my children's EHS; to prevent expert evaluations for treatment of my children's EHS; to conceal ongoing retaliation against my children and against myself; and to defraud this Court of a Final Decree of Divorce:

My ex-wife's attorney, Mr. Abel Hinojosa, refused to settle the divorce case in good faith for the benefit of my children; promised my ex-wife to win custody of my children even if her family violence was proved in Court; and refused to produce the complete medical records of my children. Unopposed Motion to Disqualify Mr. Hinojosa as my ex-wife's counsel, Orig. Clk's R. 242.

Former 92nd District Court Judge, and now Hidalgo County Criminal District Attorney, Ricardo P. Rodriguez Jr. refused to rule on two unopposed Applications for Protective Orders detailing my ex-wife's violence against my children, and her perjury to conceal the aggravation of my children's EHS, and then in response to a motion to recuse, Judge Rodriguez refused to recuse himself. Orig. Clk's R. 89-136, 214; Clerk's Record dated Feb. 17, 2015, 38-51. (1st Supp to Clk's R. hereon)

Judge Rodriguez gave my ex-wife the decision on my children's health and education despite that she admitted before Judge Rodriguez not taking my child to the doctor when my child had been crying in pain; admitted not understanding EHS; and that EHS has to be examined by experts; admitted refusing to talk and to take my children to doctors with expertise in EHS; admitted placing my children and my medical records on the trash; admitted an assault against myself when I was video recording my child crying in pain; admitted a sexual abuser to sleep on

the same room with my children; and admitted not allowing the child witness of sexual assaults and of the assault against myself to talk to a police investigator. Reporters' Record Vol. 3, pgs 15,22,25,26,27,34-37,44,45; Criminal Complaint Section 6.

My ex-wife's attorney, Mr. Abel Hinojosa removed from my children's medical records, records documenting that two days before my ex-wife testified before Judge Rodriguez that my children do not have symptoms of my EHS, my children's pediatrician prescribed 5 studies on one child for the same symptoms of EHS; removed the doctor's Problem List documenting 34 visits of my child to the doctor with the same symptoms of EHS; removed records documenting a child's evaluation for heart problems and a hospitalization with stomach problems, and records documenting blood injuries on two children. Reporters' Record Vol. 3, pgs 10,11; 2nd Supp to Clks R. 73,157-173,178-184; unopposed Motion to Disqualify Mr. Hinojosa as counsel, Orig. Clks R. 240; Criminal Complaint Section 6;

Judge Rodriguez refused to consider my ex-wife's admissions of violence against my children and of her perjury and other attempts to conceal the aggravation of my children's EHS; refused to consider undisputed evidence of Mr. Hinojosa's fraud on the Court; and without a hearing denied another unopposed motion for Ex parte protective orders, and did not allow me to appear to Court by phone anymore. Reporters' Record Vol. 4; unopposed Motion for Protective Orders, 2nd Supp to Clks R. 59-198; unopposed Motion to Disqualify Mr. Hinojosa, Orig. Clks R. 236-243; Response to Request for Admissions, 2nd Supp to Clks R. 89-99.

Judge Rodriguez refused to rule on an unopposed motion to recuse detailing his fraud on his Court until four months after the motion was filed, and then refused to recuse himself. Orig. Clks R. 214.

Senior District Judge, J. Manuel Bañales, despite of his disqualification to preside on the case, refused to recuse himself, and without consideration of undisputed evidence proving Judge Rodriguez fraud on his Court denied two motions to recuse Judge Rodriguez. Orig. Clks R. 111-136, 215-221; 1st Supp Clks R. 55, 56-59; 2nd Supp Clks R. 16-42; Criminal Complaint Section 6.

139th District Judge, and Administrative Judge, Bobby Flores refused to consider undisputed evidence on the record proving Judge Rodriguez and Mr. Hinojosa fraud on the Court to conceal my ex-wifes violence against my children and the aggravation of my childrens EHS by the radiation at school, and despite of his disqualification to preside on the divorce case, denied my request to assign a visiting Judge to the case; denied my request to allow me appearing by phone to Court and set the date for the final pretrial conference and for a jury trial. 1st Supp Clks R. 77-78; Criminal Complaint Section 8.

After Judge Rodriguez resigned to get elected Criminal District Attorney, former Texas governor, Rick Perry appointed Jaime E. Tijerina to preside on the 92nd District Court.

The now former Judge Tijerina refused to consider undisputed evidence on the record proving the fraud on the Court by Judge Rodriguez and Mr. Tijerina; did not allow me to appear by phone to the final pretrial conference; did not make preparations for a ~~scheduled~~ jury trial; and without a hearing, denied the unopposed motion for protective orders, the unopposed motion to disqualify Mr. Hinojosa, and the unopposed motion to appear by phone to Court and did not allow me to appear by phone to trial. Reporters Record Vol. 6; Motion to Disqualify Mr. Hinojosa, Orig. Clks R. 236-249; Motion for Protective Orders, Orig. Clks R. 274; Motion to appear by phone to Court, 2nd Supp Clks R. 207; Orders denying Motions, Orig. Clks R. 275, 276, 277.

On April 30, 2014, Judge Tijerina signed a Final Decree of Divorce that was submitted by Mr. Hinojosa stating falsely among other things that I waived my right to a jury trial; and that with my signature I gave my ex-wife the exclusive right over my children's health and education; that I agreed to see my children only 24 hours per month; and that I agreed to pay child support and medical support based on minimum wage. My signature is not affixed to the Final Decree of Divorce as misrepresented. Orig. Clks R. 278, 279, 280, 282, 284, 290, 297, 299. Criminal Complaint Section 8, Id.

The Final Decree of Divorce signed by Judge Tijerina states falsely that before I signed the Final Decree of Divorce, I read it fully and completely; that I had the opportunity to ask questions; that I understood that the contents of the Final Decree of Divorce constitute a full and complete resolution of the case; that I voluntarily affixed my signature to the Final Decree of Divorce; and that I did not sign by virtue of any coercion, any duress, or any agreement. At no time I saw the Final Decree of Divorce before it was signed by Judge Tijerina, and my signature is not affixed to the Final Decree of Divorce as misrepresented to the Court. Orig. Clks R. 297, 299. Criminal Complaint Section 8.

In response to my request to come forward and explain to the Court that the Final Decree of Divorce is invalid, neither former Judge Rodriguez, former Judge Tijerina or Mr. Hinojosa have disputed the evidence or claims of their participation to defraud the 92nd District Court of a false Final Decree of Divorce to conceal my ex-wife's violence against my children; to conceal the aggravation of my children's EHS; and to prevent expert evaluations for treatment of my children's EHS.

Despite of knowing that the orders of child and medical support were obtained by fraud on the Court, the Texas Attorney General, Ken Paxton is attempting to enforce the orders by incarceration, and has obtained an order compelling my appearance in person to Court under penalty of arrest or default judgement or both, knowing that appearing in person to Court is bound to aggravate my life-threatening EHS; knowing that my ex-wife and my children are still in my home, where I am with my children as before the divorce; knowing of my inability to pay child or medical support; and knowing that confinement in jail is for me a death sentence.

Request for Disclosures

Pursuant to Tex. R. Civ. P. 194, the State of Texas, and Defendant the Texas Attorney General, Ken Paxton are requested to disclose within 30 days of service of this Request, the information and material described in Tex. R. Civ. P. 194.2(b), 192.3(j), 194.2(c), 194.2(d), 194.2(e), 194.2(f)1, 194.2(f)2, 194.2(f)(3), 194.2(f)(4)(A), 194.2(f)(4)(B), 194.2(f)(3), 194.2(g) to (i), 194.2(j), 194.2(k), 194.2(l).

Request for Jury Trial

I respectfully request the Court a trial by jury in this case, on the ground that Petitioner is attempting to enforce by incarceration support orders that were obtained by fraud on the Court knowing of my inability to pay child or medical support, and knowing that confinement in jail is for me a death sentence; and on the ground that Defendants Paxton malicious conduct has triggered the Constitutional protection of a trial by jury. My Motion and Affidavit to proceed without payment of fees and costs is attached.

RELIEF

For all these reasons, I respectfully request the Court to deny all the relief sought by Petitioner on its Motion for Enforcement and Suit for Modification of Support Order, and to compel Defendant the Texas Attorney General, Ken Paxton to declare that the orders of child and medical support he is attempting to enforce were obtained by fraud on the Court; to compel Defendant Paxton to cease and desist ~~on~~ his attempts to enforce the support orders on the Final Decree of Divorce; to cease and desist from his attempts to conceal the legitimacy of EHS as a medical health condition and disability; and to cease and desist from his retaliation against my children and against myself; and that the Court provides any remedy in equity or at law that my children may be entitled.

Respectfully submitted

Jesus Mendoza 8 May, 2016
Jesus Mendoza, Pro-se Respondent

2202 E. 28th St. Mission, Texas 78574 (956)519 7140

Certificate of Service

I certify that on May 9, 2016 I sent by hand delivery a copy of the above to opposing counsel.

Jesus Mendoza