

FORT WORTH METRO

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NCP Name: *BRANDON TYREKE HARRIS*

CP Name: *AYSIA LUWANA MILLER*

OAG Number: **0014333105**

LAC: **AOPP**

CAUSE NUMBER 322-724861-22

IN THE INTEREST OF

§ IN THE _____ DISTRICT COURT

AKAIYA NAOMI HARRIS
AYDON JAMAL HARRIS

§
§
OF

CHILDREN

§ *TARRANT COUNTY, TEXAS*

ORIGINAL PETITION IN SUIT AFFECTING THE PARENT-CHILD RELATIONSHIP (AOP)

1. The OFFICE OF THE ATTORNEY GENERAL, representing the State of Texas, files this pleading pursuant to Texas Family Code Chapter 231 for which discovery is intended to be conducted under Level 2 of Rule 190, Texas Rules of Civil Procedure. The OFFICE OF THE ATTORNEY GENERAL is assigned the support and enforcement rights in this case.

JURISDICTION

2. No Court has continuing jurisdiction of this suit or of the children the subject of this suit. There are no court-ordered conservatorships, guardianships, or other court-ordered relationships affecting the children the subject of this suit.

CHILDREN

3. The following children are the subject of this suit:

Name	Sex	DOB
<i>AKAIYA NAOMI HARRIS</i>	F	6/3/2021
<i>AYDON JAMAL HARRIS</i>	M	8/2/2022

No property, other than personal effects, is owned by any child the subject of this suit.

PERSONS ENTITLED TO NOTICE

4. The children reside with the *mother*, *AYSIA LUWANA MILLER*, a resident of Texas. The OFFICE OF THE ATTORNEY GENERAL requests the issuance and service of process on this person in accordance with the attached service information sheet.

5. The *father* of the children is *BRANDON TYREKE HARRIS*, a resident of Texas. The OFFICE OF THE ATTORNEY GENERAL requests the issuance and service of process on this person in accordance with the attached service information sheet.

DETERMINATION OF DISCLOSURE OF ADDRESS

6. The Court should enter appropriate orders concerning the disclosure of the addresses of the parties.

PARENTAGE

7. Parentage of the child(ren), *AKAIYA NAOMI HARRIS, AYDON JAMAL HARRIS*, subject of this suit, was established when a properly executed Acknowledgment of Paternity was filed with the Vital Statistics Unit pursuant to Texas Family Code, Chapter 160. Attached as **EXHIBIT A and B**, is a copy of the Acknowledgment of Paternity.

CONSERVATORSHIP

8. Because the parents of the children are separated, the Court should appoint appropriate conservators pursuant to Texas Family Code § 153.005.

SUPPORT

9. The Court should order appropriate current and retroactive child, medical, and dental support for the children, including temporary support pursuant to Texas Family Code §§ 160.624 and 105.001. In determining the amount of retroactive support the Court should consider the duty of parents to support their minor children, and all applicable provisions of the Texas Family Code. In addition, the Court should order medical support and dental support, including any employment-related or other group health insurance and group dental insurance that is available to the parent.

WITHHOLDING FROM EARNINGS FOR SUPPORT

10. The Court should order all support withheld from disposable earnings pursuant to Texas Family Code § 158.006. The Court should order all payments of support processed pursuant to Texas Family Code Chapter 231 for distribution according to law. If appropriate, the Court should order *BRANDON TYREKE HARRIS* to post a bond or security.

REQUEST FOR PRODUCTION OF DOCUMENTS

11. *BRANDON TYREKE HARRIS* has in his possession documents that will show the nature and extent of his ability to pay child support. The OFFICE OF THE ATTORNEY GENERAL, pursuant to Rule 196, Texas Rules of Civil Procedure, requests him to produce and permit the OFFICE OF THE ATTORNEY GENERAL to inspect and copy the originals, or true copies, of the following documents in his possession, custody, or control showing income received, including but not limited to:

- (1) income tax returns for the previous two years, including the same for a party's DBA or sole- proprietorship (including Schedule C). If no return has been filed, then Form W-2, Form 1099, and Schedule K-1 for such years;**
- (2) all payroll check stubs received in the prior three months (including military LES); and**
- (3) all policies, statements, and the summary description of benefits for any medical, dental, and health insurance coverage that is or would be available for the children.**

The OFFICE OF THE ATTORNEY GENERAL requests production of the specified documents at:

The Office of the Attorney General
CHILD SUPPORT OFFICE
2001 BEACH ST STE 800
FT WORTH, TX 76103-2300
or

CSD-legal-914@oag.texas.gov

on or before 3:00 p.m. on the 30th day following the date of service of this request. If not provided prior to the initial hearing, the OFFICE OF THE ATTORNEY GENERAL may request the Court order *BRANDON TYREKE HARRIS* to provide additional financial information pursuant to Texas Family Code § 154.063.

COSTS

12. The Court should order *BRANDON TYREKE HARRIS* to pay costs of this proceeding.

PRAYER

The OFFICE OF THE ATTORNEY GENERAL prays that the Court grant all relief requested herein. The OFFICE OF THE ATTORNEY GENERAL prays for general relief.

Respectfully submitted,

Ken Paxton
Attorney General of Texas

Brent Webster
First Assistant Attorney General

Holly Hayes
Holly Hayes SBN# 24110698

TAMEKA D BOYD - SBN: 24027406
CHOYA BURKLEY - SBN: 24012361
KARLA BYRD - SBN: 24097445
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PAULA CROCKETT - SBN: 00798123
JOHN CASHMAN - SBN: 24038807
HOLLY L HAYES - SBN : 24110698
ATTORNEY OF RECORD
CHILD SUPPORT ENFORCEMENT
CHILD SUPPORT OFFICE
2001 BEACH ST STE 800
FT WORTH TX 76103-2300
Email CSD-legal-914@texasattorneygeneral.gov
Telephone No. (817)926-7197
Toll Free 1(800)252-8014
Fax No. (817)926-0522

**STATE OF TEXAS
ACKNOWLEDGMENT OF PATERNITY**



This is a legal document. Type or Print in black ink. Parents are to be given a copy of this completed document.

We declare under penalty of perjury that

is the biological father of	BRANDON	TYREKE	HARRIS
	Biological Father's first name	middle name	last name
	AKAIYA	NAOMI	HARRIS
	Child's first name	middle name	last name
born on <u>06</u> <u>03</u> <u>2021</u> , in <u>DALLAS</u>	city	county	state
to <u>AYSIA</u>	LUWANA	MILLER	MILLER
Mother's first name	middle name	last name	maiden name if different
<u>06</u> <u>15</u> <u>1999</u>	<u>437-99-6998</u>	<u>2523 OHIO DR # 1902</u>	<u>PLANO</u>
Father's date of birth	social security number	address	city
<u>04</u> <u>02</u> <u>1999</u>	<u>379-23-3124</u>	<u>708 RICHMOND DR</u>	<u>MCKINNEY</u>
Mother's date of birth	social security number	address	city
			state
			zip code

We further declare under penalty of perjury that:

- We have been given written and oral notice of: the benefits of having paternity established; the availability of paternity establishment and child support services; and the legal consequences of, the rights and responsibilities of, and the alternative to signing this Acknowledgment.
- No other Acknowledgment of Paternity form naming another man as the biological father of this child has been filed.
- There is no court order naming another man as the biological father of this child.
- A genetic test has not determined that another man is the biological father of this child.

Fill one circle by the correct statement from EACH of the following:

<input checked="" type="radio"/> There <u>has not</u> been genetic testing of the man listed above to determine if he is the biological father of this child.	<input type="radio"/> Genetic testing <u>has</u> determined that the man listed above is the biological father of this child.
OR	
<input type="radio"/> The mother <u>was not</u> married to someone other than the biological father at the time of the child's birth or within 300 days prior to the child's date of birth, or there is a court order that states that the man the mother was married to is not the father of the child, and during the first two years of the child's life, no man continuously lived with the child and represented the child as his own.	
<input type="radio"/> The mother <u>was</u> married to someone other than the biological father at the time of the child's birth or during the 300 days before the child's birth or during the first two years of the child's life, a man continuously lived with the child and represented the child as his own; and that man has completed the Denial of Paternity below or has a Denial of Paternity filed with the Vital Statistics Unit.	

	<u>6/4/2021</u>	
Full Signature of Biological Father	date	Full Signature of Mother

Denial of Paternity (only required if "mother was married to someone other than the biological father or if, during the child's first two years of life, a man continuously lived with the child and represented the child as his own" is checked.)

We declare under penalty of perjury that

Presumed Father's first name	middle name	last name
the presumed father of the child, is not the biological father. We understand that filing of this denial with an acknowledgment removes the presumed father's legal duty to support the child and terminates his right of custody or visitation with the child.		

Full Signature of Presumed Father	date	Full Signature of Mother

Presumed Father's date of birth	social security number	Presumed Father's address
city state zip code		
Texas Department of State Health Services		
Vital Statistics		
VS-159.1F Revised 09/2011		

WARNING: This is a governmental document. Texas Penal Code, Section 37.10, specifies penalties for making false entries or providing fake information in this document.

AOP Number	Entity Code	State File Number
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3034643	0950	
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STATE OF TEXAS
ACKNOWLEDGMENT OF PATERNITY

WARNING: This is a governmental document. Texas Penal Code, Section 37.10, specifies penalties for making false entries or providing false information in this document.

This is a legal document. Type or Print in black ink. Parents are to be given a copy of this completed document.

We declare under penalty of perjury that

		BRANDON	TYREKE	HARRIS			
is the biological father of		Biological Father's first AYDON	middle JAMAL	last name HARRIS			
born on <u>08</u> <u>02</u> <u>2022</u> , in		Child's first ARLINGTON	city TARRANT	state TEXAS			
to <u>AYSIA</u>		Mother's first LUWANA	last name MILLER	maiden name if different MILLER			
<u>06</u>	<u>15</u>	<u>1999</u>	social security number 437-99-6998	address 612 ABE LINCOLN CT # 1006	city ARLINGTON	state TEXAS	zip code 76011
Father's date of birth		Mother's date of birth		address 612 ABE LINCOLN CT # 1006	city ARLINGTON	state TEXAS	zip code 76011

We further declare under penalty of perjury that:

- We have been given written and oral notice of: the benefits of having paternity established; the availability of paternity establishment and child support services; and the legal consequences of, the rights and responsibilities of, and the alternative to signing this Acknowledgment.
- No other Acknowledgment of Paternity form naming another man as the biological father of this child has been filed.
- There is no court order naming another man as the biological father of this child.
- A genetic test has not determined that another man is the biological father of this child.

Fill one circle by the correct statement from EACH of the following:

<input type="radio"/> There <u>has not</u> been genetic testing of the man listed above to determine if he is the biological father of this child.	<input type="radio"/> or <input checked="" type="radio"/> Genetic testing <u>has</u> determined that the man listed above is the biological father of this child.
<input type="radio"/> The mother <u>was not</u> married to someone other than the biological father at the time of the child's birth or within 300 days prior to the child's date of birth, or there is a court order that states that the man the mother was married to is not the father of the child, and during the first two years of the child's life, no man continuously lived with the child and represented the child as his own.	<input type="radio"/> The mother <u>was</u> married to someone other than the biological father at the time of the child's birth or during the 300 days before the child's birth or during the first two years of the child's life, a man continuously lived with the child and represented the child as his own; and that man has completed the Denial of Paternity below or has a Denial of Paternity filed with the Vital Statistics Unit.

8/4/2022

Full Signature of Biological Father

8/4/2022

Full Signature of Mother

Denial of Paternity (only required if "mother was married to someone other than the biological father or if, during the child's first two years of life, a man continuously lived with the child and represented the child as his own" is checked.)

We declare under penalty of perjury that

Presumed Father's first middle last name

the presumed father of the child, is not the biological father. We understand that filing of this denial with an acknowledgment removes the presumed father's legal duty to support the child and terminates his right of custody or visitation with the child.

Full Signature of Presumed Father	date	Full Signature of Mother	date
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Presumed Father's date of birth social security number Presumed Father's address city state zip code

Texas Department of State Health Services
Vital Statistics
VS-159.1F Revised 09/2011

AOP Number Entity Code State File Number

3193888

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2213532022