NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA
NCP Name: *JIMMY HOWARD JACKSON JR*
CP Name: *VALERIE RENAE THOMAS*
OAG Number: **0012967266**
LAC: **PATY**

<div align="center">

CAUSE NUMBER _325-725478-22_

</div>

IN THE INTEREST OF	§	IN THE _____ *DISTRICT COURT*
CALEB NATHANAEL JACKSON	§	OF
A CHILD	§	*TARRANT* COUNTY, TEXAS

<div align="center">

PETITION TO ESTABLISH THE PARENT-CHILD RELATIONSHIP

</div>

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.

<div align="center">

JURISDICTION

</div>

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

<div align="center">

CHILDREN

</div>

3.   The following child is the subject of this suit:

Name	Sex	DOB
CALEB NATHANAEL JACKSON	M	10/21/2013

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

<div align="center">

PERSONS ENTITLED TO NOTICE

</div>

4.   The child resides with the *mother*, *VALERIE RENAE THOMAS*, 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 child is *JIMMY HOWARD JACKSON JR*, 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 PARENTAGE

6.   The Court should determine the parentage of the child subject of this suit. If any party denies parentage, the Court should immediately order parentage testing. The Court should order how such fee should be paid and tax the fee as court costs.

CONSERVATORSHIP

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

NAME CHANGE

8.   The Court should consider whether good cause exists to change the surname of the minor child to reflect parentage, if established, and enter an order concerning the name of the child pursuant to Texas Family Code Chapter 160.

DETERMINATION OF DISCLOSURE OF ADDRESS

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

SUPPORT

10.   The Court should order appropriate current and retroactive child, medical, and dental support for the child, 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 child, 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

11.   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 *JIMMY HOWARD JACKSON JR* to post a bond or security.

REQUEST FOR PRODUCTION OF DOCUMENTS

12.   *JIMMY HOWARD JACKSON JR* 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 child.**

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 *JIMMY HOWARD JACKSON JR* to provide additional financial information pursuant to Texas Family Code § 154.063.

COSTS

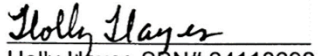13.   The Court should order *JIMMY HOWARD JACKSON JR* to pay costs of this proceeding.

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
STEPHEN E HAMMEL - SBN: 24043710
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*