

## Question

1. On December 13, 2023, Morgan Michelle Myers had a private meeting with Margie Evonne Wilson. Exhibit 1 2. This meeting was supposed to be an all-inclusive family meeting regarding a recent divorce announcement made by Morgan Michelle Myers. Exhibit 2 3. On December 14, 2023, Mother opened her own Chase bank account and began to communicate across state lines via text message with Daniel Kenneth Branthoover of Yukon, Oklahoma. Exhibit 3 4. On this day, Morgan Michelle Myers sought an ex parte order of protection against Charles Dustin Myers for alleged family violence. Exhibit 4 5. Later that evening, Morgan Michelle Myers reminded Charles Dustin Myers of a school field trip the next day, a stark departure from her emergency request for protection earlier that day. Exhibit 5 6. On December 15, 2023, at 9:42 A.M. CST, Daniel Kenneth Branthoover texted Charles Dustin Myers and claimed "I want to help both of you" and requested a call, to which Charles Dustin Myers replied "I want to fix this more than anything in the world" and on this call it was discussed that Morgan Michelle Myers would visit his residence over the weekend of December 15, 2023. Exhibit 6 7. Directly following this phone call, Charles Dustin Myers was notified that the joint-marital PNC bank account was emptied of its' \$1,576 in funds and was initiated by Morgan Michelle Myers and sent to a PayPal account belonging to Daniel Kenneth Branthoover. Exhibit 7 8. On December 16, 2023, Charles Dustin Myers was notified that the joint marital PNC bank account was overdrawn -\$800. Exhibit 8 9. Both Morgan Michelle Myers and Daniel Kenneth Branthoover admit to this transaction occurring. Exhibit 9 10. The PNC bank statement for December 2023 shows this transaction occurred. Exhibit 10 11. When Charles Dustin Myers requested the funds be returned by texting Daniel Kenneth Branthoover, he was made aware that the true intention of Morgan Michelle Myers' visit was to receive further assistance in preparing divorce paperwork in contrast to Daniel Kenneth Branthoover's initial offering of help, evidenced by his statement "I hope I can help with the paperwork and make things go as smoothly as possible." Exhibit 11 12. Daniel Kenneth Branthoover does not have a license to practice law in any of the United States. 13. On December 17, 2023, Charles Dustin Myers was served an eviction notice by Margie Evonne Wilson stating the following grounds for evictions: 1. Alease violation alleging: a. Granddaughter getting divorced. b. Protective order has been filed. c. He must leave. She and the girls may stay. Exhibit 12 Neither the divorce petition or any protective order had been filed at the time of service. 14. Margie Evonne Wilson had actual knowledge that no valid lease agreement existed at the time this eviction notice was served, and when Morgan Michelle Myers returned to Texas from Daniel Kenneth Branthoover's home in Oklahoma, she tore the eviction notice in half and wrote VOID on the document in sharpie. Exhibit 13 15. On the evening of December 17, 2023, Morgan Michelle Myers disclosed to Charles Dustin Myers that she purchased a secondary phone number while in Oklahoma registered under 817-940-0852. 16. This new phone number was used on the documents that were prepared with the administrative oversight of Daniel Kenneth Branthoover, which included: i. Original Petition for Divorce - 12.18.2023 Exhibit 14 ii. Affidavit of Indigency - 12.18.2023

Exhibit 15 iii. Request for Uncontested Cases - 12.18.2023 Exhibit 16 iv. Application for Protective Order - 12.22.2023 Exhibit 17 17. After the divorce was filed on December 18, 2023, Daniel Kenneth Branthoover texted Charles Dustin Myers and stated: "Charlie, it's come to my understanding you have retained an attorney. I'm sure he has told you that all further communication should take place between attorneys. I must formally ask you refrain from discussing details of this case with my client moving forward and only communicate with me or your attorney." - Exhibit 18 18. Morgan Michelle Myers used the US Mail Service to effectuate service on Charles Dustin Myers. - Exhibit 19 19. Margie Evonne Wilson used the US Mail Service to effectuate service on Charles Dustin Myers. - Exhibit 20 20. When served with the divorce petition on December 27, 2023, the following false statements were made by Morgan Michelle Myers, with the administrative oversight of Daniel Kenneth Branthoover with knowledge that the statements were false: i. That the spouses stopped living together on December 1, 2023. Exhibit 14 ii. That Morgan Michelle Myers owned both family vehicles as separate property prior to the marriage. Exhibit 14 iii. That Morgan Michelle Myers had an active order of protection against Charles Dustin Myers with a finding that family violence had occurred during the marriage. Exhibit 14 iv. That the children or Morgan Michelle Myers would be harassed or abused if Charles Dustin Myers were to be provided with her newly acquired phone number while in Oklahoma. Exhibit 14 21. When reviewing the affidavit of indigency filed by Morgan Michelle Myers with the administrative oversight of Daniel Kenneth Branthoover, the following statements were made with the knowledge that they were not true: i. That Morgan Michelle Myers was financially indigent and unable to pay court costs. Exhibit 15 ii. That Morgan Michelle Myers was responsible for all of the family living expenses, including rent, utilities, food, and other living expenses. Exhibit 15 iii. That Morgan Michelle Myers was responsible for both car payments. Exhibit 15 22. When served with the protective order on December 28, 2023, the following false statements were made by Morgan Michelle Myers: i. That family violence occurred on December 18, 2023, in the presence of the Children. Exhibit 16 ii. That family violence occurred prior to December 18, 2023. Exhibit 16 23. When served with the eviction suit filed by Margie Evonne Wilson through the US Marshall Service, the following false statements were made with actual knowledge of their untruthfulness: i. That Charles Dustin Myers violated a lease agreement which did not exist. 24. The common goal between Morgan Michelle Myers, through the administration of Daniel Kenneth Branthoover, and through the participation of Margie Evonne Wilson, was to have Charles Dustin Myers unlawfully removed from his residence that he relied on to earn a living for the family, gain an advantage in divorce proceedings, and finalize the divorce. 25. On the same evening the protective order was filed on December 22, 2023, Morgan Michelle Myers can be seen at the family residence with Charles Dustin Myers in no risk of danger or in any emergency. Exhibit 21 26. On December 29, 2023, Morgan Michelle Myers can be seen at the family home enjoying an evening with the Children in no risk of danger or any emergency. Exhibit 22 27. On December 16, 2023, the parties preliminary objective was completed when Charles Dustin Myers was ordered to vacate the residence, giving mother a significant advantage over the divorce proceedings. Exhibit 23 28. On December 22, 2023, Morgan Michelle Myers delayed the proceedings due to allegedly retaining

legal counsel. Exhibit 24 29. On February 1, 2023, Morgan Michelle Myers leveraged her position and a settlement agreement was drafted by Charles' Dustin Myers' own counsel. Exhibit 25 30. On February 5, 2023, Charles Dustin Myers terminated his counsel and challenged the entire foundation of the case using the same fact pattern outlined herein. Exhibit 26 31. On March 14, 2023, Charles Dustin Myers appeared at the hearing to challenge the actions of Morgan Michelle Myers, Daniel Kenneth Branthoover, and Margie Evonne Wilson, but was instead served with temporary orders and ordered to sign them despite consent not being present. Exhibit 27 32. Since March 14, 2023, Charles Dustin Myers has been litigating to prevent the finalization of the divorce, and currently has five petitions of mandamus pending before the Texas Supreme Court. See 25-0361, 25-0367, 25-0378, 25-0426, 25-0458 33. Since March 14, 2023, Morgan Michelle Myers has not been prosecuting her case, and Daniel Kenneth Branthoover has continued to harass and threaten Charles Dustin Myers throughout his attempts of seeking relief, such as "I've been watching every filing get denied" and "When this is all over, just a heads up.. you get to deal with me". Exhibits 28, 29 34. On December 16, 2024, Charles Dustin Myers filed suit against Daniel Kenneth Branthoover. Exhibit 30 35. On May 30, 2025, this Honorable Court ordered Charles Dustin Myers to show cause as to why service has not been effectuated, and he requested an extension of time to incorporate claims under RICO. Exhibit 31 EVALUATE AND PREPARE A RICO ARGUMENT

## **Answer (U.S. Federal)**

I'm sorry, I couldn't find any relevant materials to answer your question.

## **Legal Authorities**

This memo was compiled by Vincent AI based on vLex materials available as of June 14, 2025. [View full answer on vLex](#)