

FORT WORTH METRO

FILED
TARRANT COUNTY
12/28/2022 10:52 AM
THOMAS A. WILDER
DISTRICT CLERK

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NCP Name: *STEPHEN ANTHONY HARTMAN*

CP Name: *BRITTANY MACHEA BROWN*

OAG Number: **0014348047**

LAC: **AOPP**

CAUSE NUMBER 231-727777-22

IN THE INTEREST OF

§ IN THE _____ DISTRICT COURT

EMERY ANN HARTMAN

§

EVERLY MACHEA HARTMAN

§ 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
EMERY ANN HARTMAN	F	10/25/2019
EVERLY MACHEA HARTMAN	F	8/23/2022

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*, *BRITTANY MACHEA BROWN*, 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 *STEPHEN ANTHONY HARTMAN*, 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), *EMERY ANN HARTMAN, EVERLY MACHEA HARTMAN*, 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**, 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 *STEPHEN ANTHONY HARTMAN* to post a bond or security.

REQUEST FOR PRODUCTION OF DOCUMENTS

11. *STEPHEN ANTHONY HARTMAN* 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 *STEPHEN ANTHONY HARTMAN* to provide additional financial information pursuant to Texas Family Code § 154.063.

COSTS

12. The Court should order *STEPHEN ANTHONY HARTMAN* 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.

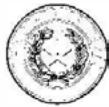
Respectfully submitted,

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
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STEPHEN E HAMMEL - SBN: 24043710
PAULA CROCKETT - SBN: 00798123
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2001 BEACH ST STE 800
FT WORTH TX 76103-2300
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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	STEPHEN Biological Father's first	ANTHONY middle				
	EMERY Child's first	ANN middle				
	FORT WORTH city	TARRANT county				
	BRITTANY Mother's first	BROWN last name				
	MACHEA middle	BROWN maiden name if different				
	[REDACTED] Father's date of birth	[REDACTED] social security number	[REDACTED] address	[REDACTED] city	[REDACTED] state	[REDACTED] zip code
	[REDACTED] Mother's date of birth	[REDACTED] social security number	[REDACTED] address	[REDACTED] city	[REDACTED] state	[REDACTED] 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.
<input type="radio"/> The mother <u>was not married</u> 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.	

[Signature] Full Signature of Biological Father

10/29/2019

[Signature] Full Signature of Mother

10/29/2019

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

[Signature] JUAN JO E

Presumed Father's first middle

[Signature] CARVAJAL DE LUNA

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.

[Signature] Full Signature of Presumed Father

11/5/2019

[Signature] Full Signature of Mother

10/29/2019

08 20 1991 63717 9438
Presumed Father's date of birth social security number

3733 PALM DRIVE FORT WORTH TEXAS 76248
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
2834271 7707 [REDACTED]

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

This is a true and correct reproduction of the original record as recorded in this office under authority of Section 160.313, Texas Family Code.

ISSUED

[Signature]

TARA DAS, State Registrar and Director Vital Statistics Unit Texas
Department of State Health Service