

**NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA**NCP Name: *CHARLES D MYERS*CP Name: *MORGAN MYERS*OAG Number: **0014563904**LAC: **INTE****CAUSE NUMBER 322-744263-23**

IN THE INTEREST OF

*MARA MYERS**CAROLINE MYERS*

CHILDREN

§ IN THE 322ND DISTRICT COURT

§

§

OF

§ TARRANT COUNTY, TEXAS

**INTERVENTION**

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.

**THE ATTORNEY GENERAL'S RIGHT TO INTERVENE**

2. The OFFICE OF THE ATTORNEY GENERAL, pursuant to Texas Family Code §§ 102.007 and 102.009 (d), is a necessary party because this is an action to establish, modify, or enforce a support right assigned to the OFFICE OF THE ATTORNEY GENERAL pursuant to Texas Family Code Chapter 231.

**JURISDICTION**

3. This Court has continuing jurisdiction of the children the subject of this suit because of prior proceedings.

**CHILDREN**

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

Name	Sex	DOB
MARA MYERS	F	6/20/2016
CAROLINE MYERS	F	4/12/2018

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

**PERSONS ENTITLED TO NOTICE**

5. The children reside with *MORGAN MYERS*, the *mother* of the children. The OFFICE OF THE ATTORNEY GENERAL will serve *MORGAN MYERS* with this pleading, by and through her attorney of record, pursuant to Rule 21a, Texas Rules of Civil Procedure.

6. *CHARLES D MYERS*, is the *father* of the children. The OFFICE OF THE ATTORNEY GENERAL will serve *CHARLES D MYERS* with this pleading pursuant to Rule 21a, Texas Rules of Civil Procedure.

### **DETERMINATION OF DISCLOSURE OF ADDRESS**

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

### **PRIOR CHILD SUPPORT ORDER**

8. On 3/14/2024 the Court ordered *CHARLES D MYERS* to pay current child support of \$973.19 *monthly*, beginning 4/1/2024, and *monthly* thereafter. The amount and frequency of *CHARLES D MYERS*'s child support obligation remains unchanged.

### **CHILD SUPPORT ARREARAGE**

9. *CHARLES D MYERS* failed to pay court ordered child support as follows:

a. Child support accrued since 4/1/2024	\$2,919.57
b. Interest accrued since 4/1/2024	\$0.00
c. Child support paid since 4/1/2024	\$0.00
d. Total child support arrearage as of 6/18/2024	\$2,919.57

**EXHIBIT A**, which is attached and incorporated by reference, is a true and correct copy of a payment record indicating the occasions Obligor violated the above-referenced order.

### **JUDGMENT ON ARREARS**

10. The Court should confirm and enter judgment for all support arrearage and accrued interest as of the court proceeding date. The Court should order payment and income withholding to liquidate the judgment pursuant to Texas Family Code Chapters 157 and 158.

### **SUPPORT**

11. The OFFICE OF THE ATTORNEY GENERAL, representing only the interests of the State of Texas, requests the Court make appropriate orders for current child support, medical support, and dental support for the children, including temporary support pursuant to Texas Family Code § 105.001. In determining the amount of support the Court should consider the duty of parents to support their minor children, and all applicable provisions of the Texas Family Code.

### **WITHHOLDING FROM EARNINGS FOR SUPPORT**

12. 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 *CHARLES D MYERS* to post a bond or security.

### **REQUEST FOR PRODUCTION OF DOCUMENTS**

13. *CHARLES D MYERS* 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: (a) his IRS federal tax returns for the past two years with all schedules included with the returns and all W-2s and 1099s attached to such returns, (b) any and all W-2 statements, all 1099s, and all documents showing income received by Respondent from any source for the two tax years preceding the date of filing of this action, (c) all payroll stubs, vouchers, records of commissions and all other written

records or evidence of income received by him within the last six months, (d) the most recent Social Security Administration Form SSA-7005, showing his income history, sent to him three months before his last birthday,(e) statements of accounts for all checking or saving accounts in which he has held an interest within the last six months, (f) all evidence (policies, premium schedules, records of premiums paid, etc.) of health and/or dental insurance available at his place of employment that may provide coverage for dependent children, (g) copies of loan applications made within the last six months, (h) current statement of benefits and account balances for all retirement, pension, or profit-sharing plans in which the respondent has accrued or may accrue benefits, regardless if such benefits have vested, including but not limited to employer- or union-sponsored defined benefit or defined contribution plans and individual retirement accounts (IRAs), and (i) summary plan description of all retirement, pension, or profit-sharing plans in which the respondent has accrued or may accrue benefits, regardless if such benefits have vested. 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 700  
FT WORTH, TX 76103-2300

on or before 3:00 p.m. on the 30th day following the date of service of this request.

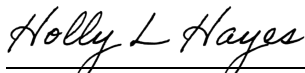
#### **PRAYER**

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



TAMEKA D BOYD - SBN: 24027406  
CHOYA BURKLEY - SBN: 24012361  
KARLA BYRD - SBN: 24097445  
STEPHEN E HAMMEL - SBN: 24043710  
MADISON LEDOUX - SBN: 24131449  
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 700  
FT WORTH TX 76103-2300  
Email CSD-legal-914@oag.texas.gov  
Telephone No. (817)926-7197  
Toll Free 1(800)252-8014  
Fax No. (817)926-0522

### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on the below listed parties or their representatives pursuant to Rule 21a, Texas Rules of Civil Procedure, on the 28th day of June, 2024.

  
\_\_\_\_\_  
CHOYA BURKLEY  
ATTORNEY OF RECORD

**Party:**

MORGAN MYERS

**Attorney for Party:**

COOPER L CARTER  
2905 LACKLAND RD.  
FORT WORTH, TX 76116  
[COOPERCARTER@MAJADMIN.COM](mailto:COOPERCARTER@MAJADMIN.COM)

CHARLES D MYERS

Attorney General of Texas - Child Support Division  
Financial Activity Report as of 06/19/2024  
Case ID: 0014563904 Cause Number: 322-744263-23  
NCP: MYERS, CHARLES D CP: MYERS, MORGAN

			Child Support		
Trans Date	Activity Type	Transaction Amount	Amount Due	Amount Applied	Balance
04/01/2024	Amount Due	973.19	973.19		973.19
05/01/2024	Amount Due	973.19	973.19		1,946.38
06/01/2024	Amount Due	973.19	973.19		2,919.57
Totals:			2,919.57	0.00	2,919.57



### Automated Certificate of eService

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Officer Filer 914 on behalf of Holly Hayes

Bar No. 24110698

csd-filer-914@texasattorneygeneral.gov

Envelope ID: 89311887

Filing Code Description: (Title IV-D OAG Use Only) Intervention

Filing Description: INTE

Status as of 6/28/2024 2:16 PM CST

Associated Case Party: MORGANMICHELLEMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
Cooper L.Carter		coopercarter@majadmin.com	6/28/2024 12:35:54 PM	SENT

Associated Case Party: CHARLESDUSTINMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
CHARLES MYERS		chuckdustin12@gmail.com	6/28/2024 12:35:54 PM	SENT