

**IN THE PROBATE COURT OF TRAVIS COUNTY, TEXAS
PROBATE COURT #1**

**IN THE MATTER OF THE ESTATE OF:
JUNE BLOCH, DECEASED
Case No.: C-1-PB-23-000919**

**EX-PARTE MOTION FOR PRESERVATION OF EVIDENCE AND SEQUESTRATION OF
NOTARY RECORDS**

TO THE HONORABLE JUDGE HERMAN GUY:

COMES NOW, Petitioner JADEN RILEY, an interested party in the above-captioned probate matter, and respectfully files this Ex-Parte Motion for Preservation of Evidence and Sequestration of Notary Records pursuant to the Texas Rules of Civil Procedure and applicable law. Petitioner moves this Court to enter an order requiring the immediate sequestration and preservation of all relevant notary public records associated with the execution of the Special Warranty Deed dated June 9, 2021, and the Will dated September 15, 2021, which are central to the estate dispute. In support thereof, Petitioner states as follows:

I. INTRODUCTION & NATURE OF THE EMERGENCY

1. This matter involves allegations of fraudulent execution and notarization of estate-related documents, specifically the Special Warranty Deed and the 2021 Will of June Bloch. Petitioner has reason to believe that these documents contain forged signatures and were improperly notarized in violation of Texas law.
2. The notaries who notarized these documents are employees of the law firms currently representing Lindsey Bloch, the primary beneficiary of the contested will. Given the firm's direct interest in upholding the validity of these documents, there is a substantial risk that notary records may be altered, backdated, or destroyed to legitimize improper notarizations.
3. Ex-parte relief is necessary to prevent the destruction or tampering of critical evidence before opposing counsel is aware of this motion. If opposing counsel is given advance notice, they will have an opportunity to modify the notary records, thereby prejudicing Petitioner's ability to establish fraud and misconduct in this matter.
4. There is substantial risk that critical records—especially notary logs, digital correspondence, and financial documentation—may be altered or destroyed to conceal fraudulent conduct. Given the direct financial interest of the law firms involved, immediate judicial sequestration of these records is necessary to preserve the integrity of this probate matter and prevent obstruction of justice.

II. NOTARIES AND LAW FIRMS INVOLVED

1. The following individuals and firms are directly connected to the notarization of the contested documents:
 - Darri Cross – Notary Public for the June 9, 2021, Special Warranty Deed; an assistant to Rick M. Albers at Kuperman, Orr & Albers, P.C.
 - Lois Stanton – Notary Public for the September 15, 2021, Will; a partner at Osborne, Helman, Scott, Knisely & Stanton, LLP
 - Tyler R. Hannusch – Associate Attorney and Witness for the September 15, 2021, Will
 - Frank Schiller – Floor Manager and Witness for the September 15, 2021, Will
 - In addition to the identified notary publics and law firms, this Court should require all relevant financial institutions, title companies, and real estate offices to preserve all transaction records, including wire transfers, account statements, loan approvals, and emails related to the estate transactions in question.

III. LEGAL BASIS FOR PRESERVATION OF EVIDENCE

1. The Texas Rules of Evidence and Texas case law recognize that a party may seek court intervention to prevent the destruction of key evidence when there is a credible risk of spoliation. Courts have found that notary logs are critical legal records subject to evidentiary preservation in cases involving alleged fraud, forgery, and undue influence.
2. Under Texas Government Code § 406.014, notaries are legally required to keep accurate and complete records of notarizations, including:
 - The identity of the signatory;
 - The method used to verify the signatory's identity;
 - Whether the signatory appeared in person; and
 - Any notes indicating whether the signatory required assistance or exhibited any impairment.
3. If these logbooks are modified or destroyed before being reviewed, Petitioner will be unable to establish fraudulent notarization, thereby undermining Petitioner's case and obstructing justice.
4. Texas law is clear that notaries and fiduciaries must maintain complete, accurate records and that any attempt to alter, destroy, or conceal evidence relevant to this case may constitute obstruction of justice under Texas Penal Code § 37.09. The Court has a duty to prevent and punish any such misconduct.
 - Texas Estates Code § 351.101: Requires the executor to act in the estate's best interest and preserve all estate-related documents.
 - Texas Penal Code § 37.09 (Tampering with Evidence): Criminalizes intentional destruction or alteration of evidence in an ongoing legal proceeding.

IV. REQUESTED RELIEF

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that this Court enter an order ensuring the preservation, integrity, and transparency of estate-related documents by implementing the following protective measures:

1. Immediate Court-Ordered Sequestration of Notary Logs & Estate Documents

To prevent the destruction or alteration of critical estate records, Petitioner requests that the Court order:

- The sequestration and preservation of all notary records, estate documents, and financial transaction records associated with:
 - The June 9, 2021 Special Warranty Deed.
 - The September 15, 2021 Will.
 - All estate-related financial transactions initiated between June 2021 and the present.
- The removal of all original notary logs, estate records, and financial transaction documents from the possession of any party with a conflict of interest and their placement under court-supervised custody to prevent unauthorized alterations or destruction.
- That no modifications, deletions, or transfers of these records be permitted without explicit court authorization.
- That compliance with this order be completed within 48 hours of issuance.

2. Mandatory Preservation of Financial & Digital Records

To ensure transparency in estate transactions, Petitioner requests that the Court require:

- Banks, mortgage lenders, and title companies involved in estate transactions to preserve and produce:
 - Loan applications, wire transfers, and financial account activity records connected to the estate.
 - Any internal correspondence related to estate-related financial transactions.
- Opposing counsel and their clients to preserve and produce:
 - Emails, text messages, and digital communications related to the notarization, estate transactions, and financial decisions made by the executor.
 - Time-stamped digital signatures and electronic document metadata to confirm authenticity.
- That all electronic devices used in connection with the estate (including computers, hard drives, and mobile devices) be forensically imaged within 10 days to prevent deletion or tampering.

3. Independent Forensic Review of Notary & Financial Records

To ensure a full and impartial investigation into the validity of estate documents, Petitioner requests that the Court appoint a neutral forensic examiner to:

- Conduct a full forensic review of notary logs, estate financial records, and legal billing records.
- Identify any inconsistencies, retroactive alterations, missing records, or evidence of document tampering.
- Determine whether any unauthorized notarial acts, misrepresentations, or financial mismanagement occurred.

- Ensure full cooperation from all involved parties, including opposing counsel and their affiliated law firms.

4. Court-Ordered Production of Security Footage & Witness Logs

To establish the legitimacy of document execution, Petitioner requests that the Court order:

- The law firms, notary offices, and financial institutions involved in estate transactions to produce:
 - Security camera footage from any law firm, title company, or financial institution involved in the execution of estate-related documents.
 - Visitor logs and appointment records from law offices where documents were signed.
 - Email and phone logs between notaries, attorneys, and financial institutions concerning the estate transactions.

5. Sanctions for Non-Compliance

To deter document tampering and ensure adherence to legal requirements, Petitioner requests that the Court impose escalating penalties for any violations of this order:

- First Violation: A \$10,000 fine for any party found to have altered, concealed, or destroyed estate documents, imposed upon motion by Petitioner or at the Court's discretion (sua sponte).
- Second Violation: A presumption of fraud, whereby the Court may rule that missing evidence is presumed fraudulent and issue an adverse inference ruling against the violating party.
- Third Violation: Referral to law enforcement for obstruction of justice, potential criminal charges, and immediate disqualification from estate proceedings..

6. Any Further Relief the Court Deems Necessary

To protect the integrity of estate proceedings and ensure full compliance with evidence preservation orders, Petitioner requests that the Court retain the authority to impose any additional restrictions, penalties, or procedural limitations as necessary.

Respectfully submitted,

JADEN ALEXANDRA RILEY

Petitioner, Pro Se

312 W 2nd St., Unit #A-2922

Casper WY 82601-2412

1-307-228-1090

jadenalexandrariley@gmail.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion has been submitted to the Travis County Clerk for filing on February 12, 2025, and that service upon all required parties shall be completed pursuant to Texas Rules of Civil Procedure upon court acceptance and processing. I will comply with all instructions from the court regarding service and notification of interested parties.

A handwritten signature in black ink, appearing to be 'JADEN ALEXANDRA RILEY', with a stylized, cursive-like script.

JADEN ALEXANDRA RILEY
Petitioner, Pro Se