

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NCP Name: *AUBREY ROSHON TAYLOR*
CP Name: *AUBREY NICOLE WILLIAMS*
OAG Number: **0012322606**
LAC: **MREV**
SPN: 99991234

CAUSE NUMBER 201081300

IN THE INTEREST OF § IN THE 310TH JUDICIAL DISTRICT
DAVID AUBREY TAYLOR § COURT OF
A CHILD § HARRIS COUNTY, TEXAS

MOTION TO REVOKE COMMUNITY SUPERVISION

1. The ATTORNEY GENERAL OF TEXAS, 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.

JURISDICTION

2. This Court has continuing jurisdiction of the child the subject of this suit because of prior proceedings.

CHILDREN

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

Name	Sex	DOB
DAVID AUBREY TAYLOR	M	8/31/2010

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

PERSONS ENTITLED TO NOTICE

4. The child resides with *AUBREY NICOLE WILLIAMS*, the *mother* of the child. The ATTORNEY GENERAL OF TEXAS does not request the issuance and service of process on this person.

5. *AUBREY ROSHON TAYLOR* is the *father* of the child. The ATTORNEY GENERAL OF TEXAS requests the issuance and service of process on this person in accordance with the attached service information sheet.

COMMUNITY SUPERVISION

6. On 2/4/2015 the Court signed an order which found *AUBREY ROSHON TAYLOR* in contempt of Court and ordered him committed to the county jail, but suspended the commitment and placed him on community supervision on specified terms and conditions. **EXHIBIT A**, attached and incorporated by reference, is a true copy of the relevant portions of said order.

VIOLATIONS OF TERMS AND CONDITIONS OF COMMUNITY SUPERVISION

- 7. **EXHIBIT B**, attached and incorporated by reference is a true and correct copy of the payment record, shows *AUBREY ROSHON TAYLOR* violated the terms and conditions of community supervision by not timely paying current child support, current medical support, child support arrearage and medical support arrearage as required.
- 8. The Court should revoke the community supervision and order him committed to the county jail.
- 9. The Court should order *AUBREY ROSHON TAYLOR* to appear and respond to this motion.

PRIOR CHILD SUPPORT ORDER

10. On 1/20/2011 the Court ordered *AUBREY ROSHON TAYLOR* to pay current child support of \$350.00 monthly, beginning 1/1/2011, and monthly thereafter. Also on 2/4/2015 the Court granted a judgment against *AUBREY ROSHON TAYLOR* in the amount of \$18,257.48 and ordered *AUBREY ROSHON TAYLOR* to pay said judgment by paying \$500.00 monthly beginning 3/1/2015 and monthly thereafter until the arrearage is paid in full. The amount and frequency of *AUBREY ROSHON TAYLOR*'s child support obligation remains unchanged.

Attached as **EXHIBIT C** and incorporated by reference is the true and correct copy of the relevant portions of said order.

CHILD SUPPORT ARREARAGE

- 11. *AUBREY ROSHON TAYLOR* failed to pay court ordered child support as follows:
 - a. Prior child support arrears as of 1/31/2015 \$18,257.48
 - b. Child support accrued since 1/31/2015 \$8,750.00
 - c. Interest accrued since 1/31/2015 \$2,429.81
 - d. Child support paid since 1/31/2015 \$3,210.00
 - e. Total child support arrearage as of 2/23/2017 \$26,227.29
- 12. *AUBREY ROSHON TAYLOR* has repeatedly violated the child support order and the ATTORNEY GENERAL OF TEXAS anticipates that he will similarly continue to violate the order.

PRIOR MEDICAL SUPPORT ORDER

13. On 1/20/2011 the Court ordered *AUBREY ROSHON TAYLOR* to pay current medical support of \$70.00 monthly, beginning 1/1/2011, and monthly thereafter. Also on 2/4/2015 the Court granted a judgment against *AUBREY ROSHON TAYLOR* in the amount of \$3,824.80 and ordered *AUBREY ROSHON TAYLOR* to pay said judgment by paying \$100.00 monthly beginning 3/1/2015 and monthly thereafter until the arrearage is paid in full. The amount and frequency of *AUBREY ROSHON TAYLOR*'s medical support obligation remains unchanged.

Attached as **EXHIBIT C** and incorporated by reference is the true and correct copy of the relevant portions of said order.

MEDICAL SUPPORT ARREARAGE

14. *AUBREY ROSHON TAYLOR* failed to pay court ordered medical support as follows:
- | | |
|---|------------|
| a. Prior medical arrears as of 1/31/2015 | \$3,824.80 |
| b. Medical support accrued since 1/31/2015 | \$1,750.00 |
| c. Medical interest accrued since 1/31/2015 | \$539.27 |
| d. Medical support paid since 1/31/2015 | \$140.00 |
| e. Total medical arrearage as of 2/23/2017 | \$5,974.07 |

The total arrearage amount recited above does not include unreimbursed medical expenses. **EXHIBIT B**, 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.

15. *AUBREY ROSHON TAYLOR* has repeatedly violated the child support order and the ATTORNEY GENERAL OF TEXAS anticipates that he will similarly continue to do so.

JUDGMENT ON ARREARS

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

WITHHOLDING FROM EARNINGS FOR SUPPORT

17. 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 *AUBREY ROSHON TAYLOR* to post a bond or security.

REQUEST FOR PRODUCTION OF DOCUMENTS

18. *AUBREY ROSHON TAYLOR* has in his possession documents that will show the nature and extent of his ability to pay child support. The ATTORNEY GENERAL OF TEXAS, pursuant to Rule 196, Texas Rules of Civil Procedure, requests him to produce and permit the ATTORNEY GENERAL OF TEXAS 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 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 ATTORNEY GENERAL OF TEXAS requests production of the specified documents at:

The Office of the Attorney General
CHILD SUPPORT OFFICE
6161 SAVOY DR STE 420
HOUSTON, TX 77036-3316

on or before 3:00 p.m. on the 50th day following the date of service of this request.

ATTORNEY'S FEES AND COSTS

19. The Court should order *AUBREY ROSHON TAYLOR* to pay reasonable attorney's fees and all other costs of this proceeding.

PRAYER

The ATTORNEY GENERAL OF TEXAS prays that the Court grant all relief requested herein. The ATTORNEY GENERAL OF TEXAS prays for general relief.

Respectfully submitted,

Ken Paxton
Attorney General of Texas

Jeffrey C. Mateer
First Assistant Attorney General



Mia D. Searles
TBN-24068544

ATTORNEY OF RECORD
CHILD SUPPORT DIVISION
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6161 SAVOY DR STE 420
HOUSTON TX 77036-3316
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I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 22, 2026

Certified Document Number: 74202308 Total Pages: 6

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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