SHUNTE KING v. RONALD C. RICHARD

LACK OF JURISDICTION / NON-PARTY / NON-LOUISIANA RESIDENT DUE-PROCESS COMPLAINT

Commission File No. 25-606 | Status Correction, Human Impact, and Advocacy Summary | October 16, 2026

CRITICAL STATUS CORRECTION

The earlier Dr. Matthews packet should not imply that Shunte King's Commission matter was closed. John King's separate File No. 25-062 received a March 28, 2025 letter stating that the Commission could not open an inquiry on his submission. Shunte King's File No. 25-606 followed a materially different path: the Commission reviewed the complaint, assigned File No. 25-606, stated that the Office of Special Counsel had not taken a position at that time, and afforded Judge Richard an opportunity to answer the complaint. The January 21, 2026 Commission letter also describes Commission proceedings as confidential and refers to a pending resolution. No closure letter for File No. 25-606 has been located in the records provided through October 16, 2026.

Source: Judiciary Commission letter to Shunte King, Jan. 21, 2026; Judiciary Commission letter to John C. J. King, Mar. 28, 2025.

BEST ACCURATE DESCRIPTION OF THE STATUS

File No. 25-606 should be described privately to an advocate or attorney as a pending, confidential Commission matter in investigatory review. The records support that the complaint moved beyond simple intake and that Judge Richard was given an opportunity to respond. The January 21 letter does not itself announce a final finding of misconduct, and this summary does not claim one.

1. Why this distinction matters

Shunte's complaint is not merely a duplicate of John's earlier complaint. It is her own complaint based on injuries and exposure she says she personally experienced as a non-party, out-of-state spouse who was pulled into Lake Charles City Court Case No. 23-2124, threatened with contempt consequences, subjected to disputed service and identity records, and later faced criminal-warrant exposure. The Commission's treatment of File No. 25-606 must therefore be discussed separately from John's File No. 25-062.

The core advocacy question is not whether every allegation has already been proven. It is whether an independent reviewer should examine the complete service record, missing transcript, appellate record, contempt papers, warrant materials, court-cost ledger, identity/address records, and communications before reaching a conclusion.

2. Commission status chronology

Date	Documented Event	Why It Matters
Mar. 28, 2025	John King - File No. 25-062: Commission letter states it could not open an inquiry on John's submission.	This is the disposition that was mistakenly allowed to blur into Shunte's separate file.
Dec. 3, 2025	Commission correspondence to Shunte references File No. 25-606 and requests additional complaint attachments/evidence.	Shows Shunte's matter had a separate Commission file and continuing evidence intake.
Jan. 21, 2026	Commission states Shunte's complaint was reviewed and assigned File No. 25-606; Special Counsel had not taken a position;	This is not closure language. It reflects ongoing confidential Commission handling beyond initial intake.

STATUS NOTE: File 25-606 is separate from John King's File 25-062. No closure disposition for File 25-606 appears in the records reviewed. This memo does not state that misconduct has been adjudicated.

Date	Documented Event	Why It Matters
	Judge Richard was afforded an opportunity to answer.	
Feb. 23, 2026	Shunte files a formal consolidated ethics complaint under File No. 25-606 with supporting case chronology and evidence categories.	Expands the record beyond the original complaint.
Aug. 23, 2026	Shunte submits a 32-page supplemental investigative memorandum addressed to a Judiciary Commission judicial investigator.	The memorandum asks the Commission to obtain the missing second portion of the Nov. 14 record before reaching a conclusion.
Oct. 16, 2026	No closure disposition for File No. 25-606 appears in the records supplied for this review.	The file should not be described as closed based on John's separate 25-062 letter.

3. Shunte King's claims - stated precisely

- Non-party status. Judge Richard's later Rule to Show Cause expressly describes “SHUNTE KING” as a non-party in the referenced 23-2124 matter. Shunte's position is that she did not become a litigant in John King's civil case simply by being his spouse or by assisting during a medical crisis.
- Lack of effective service and personal-jurisdiction concerns. Shunte maintains that no valid Rule to Show Cause was personally served on her before the events used to justify later contempt exposure, and that service attempts used addresses that were not her domicile.
- Non-Louisiana resident issue. Shunte's claim is not that nonresidency alone makes her immune from lawful process. Her narrower position is that an out-of-state non-party could not lawfully be compelled, punished, or subjected to contempt without a valid jurisdictional basis, legally sufficient notice, and service.
- Contempt without counsel. Attorney Oliver “Jackson” Schrumpf wrote on Nov. 22, 2024 that he did not represent Shunte in the contempt proceeding and that attempted service on him for Shunte was not effective. His later motion again disclaimed representation of both Kings in contempt matters.
- Missing second portion of the Nov. 14, 2024 record. Judge Richard's own later Rule to Show Cause refers to a Nov. 14 contempt hearing involving John King after the ordinary civil matter. Shunte's supplemental memorandum says the complete record of that later proceeding has never been produced and asks the Commission to obtain it.
- Medical emergency / seizure allegation. Shunte reports that John experienced a severe medical crisis with seizure activity and collapse during the later courtroom events and that emergency assistance was sought. This point is presented as an allegation requiring the missing transcript, security records, and medical corroboration, not as an adjudicated fact.
- Crime-victim confidentiality and address exposure. Before the Nov. 14 proceedings, Shunte submitted a crime-victim letter requesting protection of identifying information and addresses. Her later correspondence states that public disclosure of addresses increased fear for her own safety and that of family members.
- Post-appeal conduct. The Louisiana Third Circuit later held that the trial court had been divested of jurisdiction upon the signing of the appeal order and reversed the rescission of John's pauper status, the setting of his pro se motions, and the order directing his counsel to appear. This appellate ruling is independent of the Kings' allegations.
- Later criminal/warrant exposure. Shunte's 2026 filings challenge the warrant issued under Case No. 24-5624, including identity, address, service, and probable-cause issues. Her filings identify the warrant as Warrant No. 26-13913 and state that it used the name “Lanicia Shunte Jones.”

- Broader retaliation / coordination allegations. Shunte alleges that the contempt and warrant sequence occurred against a wider background of property-theft complaints, disputed notarizations, counsel-access problems, school/family-court overlap, court-cost escalation, and complaints against officials. Those broader coordination theories remain allegations unless independently corroborated.

4. The full human impact - what this has cost Shunte and her family

WHY THIS SECTION IS INCLUDED

A civil-rights advocate cannot understand the seriousness of Shunte's complaint by reading only case numbers and statutes. Her filings repeatedly describe fear, financial depletion, loss of privacy, family disruption, reputational injury, educational and employment interference, and the burden of trying to protect a medically fragile spouse while simultaneously defending herself from contempt and warrant exposure. Where the underlying fact is not independently verified, it is identified here as Shunte's reported experience rather than as an adjudicated finding.

A. Fear for personal safety and loss of the feeling of being safe

- Shunte's Nov. 14, 2024 crime-victim letter asked the court to protect her addresses and identifying information because she reported continuing safety threats and participation in a crime-victim confidentiality program.
- In the Nov. 22 email chain, John told the court that disclosure and use of addresses had exposed Shunte and family members to danger and that she feared for her life. The correspondence says his mother would need to relocate because of address exposure.
- Shunte's later warrant filings state that she began using relatives' addresses for correspondence because she feared for her safety.
- Her filings also connect this fear to a later fatal home-intrusion incident at a family residence after earlier safety warnings. This summary does not claim the court caused that incident; it records that Shunte identifies it as a profound source of fear and trauma in the chronology.

B. Psychological and emotional consequences

- Shunte's filings describe the trauma as lasting and severe, including a continuing sense that participation in court, disclosure of an address, or contact with officials could expose her or relatives to further danger.
- She describes having to defend herself simultaneously as a spouse, crime victim, out-of-state non-party, contempt target, and later warrant subject - while trying to obtain counsel and understand proceedings in which she says she was never properly joined.
- Her filings characterize the combined effect as irreparable emotional and psychological harm to both Shunte and John. This is Shunte's reported impact and should be evaluated alongside any medical, counseling, or other corroborating records she chooses to provide privately.

C. Financial depletion

- The Nov. 22 correspondence states that flights connected to the prior week's compelled travel cost approximately $850.
- Shunte's filings describe repeated interstate travel, legal consultations, transcript expenses, service charges, court costs, and the cost of responding to contempt and warrant proceedings as draining family resources.
- Her filings further object to approximately $5,000 in late-2024 court-cost activity and an $800 transcript charge. Whether each assessment was lawful is a legal question; the practical burden on the family is part of the claimed harm.
- The financial consequences are described not merely as litigation expense but as depletion of resources needed for housing, safety, travel, medical needs, legal representation, and ordinary family obligations.

D. Family and caregiving burden

- Shunte reports that she was trying to protect and assist John while he was experiencing serious neurological and spinal problems, including a reported courtroom seizure/medical crisis.
- The record reflects that John had documented medical limitations and requested remote participation before the Nov. 14 trial, yet traveled from New Jersey to Louisiana to appear.
- Shunte's filings describe the litigation as spilling into their family relationships, children's schooling, and the couple's ability to function without constant preparation for hearings, travel, service disputes, or emergency filings.
- The family-court and school-related allegations - including LCCP overlap and interference with access to children - remain separate evidentiary tracks that require independent proof, but they are part of the family consequences Shunte asks advocates to review.

E. Education, employment, and professional reputation

- Shunte alleges that officials or persons associated with the disputes contacted universities, law/graduate-school personnel, employers, medical providers, and other institutions in New Jersey, causing reputational and professional harm.
- The federal filing alleges a campaign of contacts with educational campuses and medical institutions intended to disrupt healthcare and employment. These allegations require the underlying emails, call logs, witness statements, or institutional records before being treated as established facts.
- The accusation that Shunte was “practicing law” while assisting her husband is described in her filings as especially damaging because she was not appearing as an attorney and says the characterization was used to stigmatize ordinary spousal assistance.

F. Loss of privacy and identity integrity

- Shunte's complaint repeatedly raises use of addresses that she says were not her domicile, including an Iowa, Louisiana address, while she was an out-of-state resident.
- Her later warrant challenge identifies variations in her name across records and argues that identity was not independently verified before criminal referral.
- For a person already requesting crime-victim confidentiality, disputed addresses and identity information created an additional layer of fear: not knowing where process was being sent, what name was being used, or which record would follow her into another proceeding.

G. Legal exposure and inability to simply disengage

- What began as John's civil suit over a disputed vehicle/notarial transaction eventually placed Shunte herself in contempt papers and later criminal-warrant litigation.
- Schrumpf expressly disclaimed representing her in contempt, leaving Shunte to confront a proceeding she says she had not initiated and for which she did not have Louisiana counsel.
- The warrant and criminal case transformed what she describes as an unwanted role in her husband's civil litigation into the possibility of arrest and prosecution, with corresponding travel, legal-defense, and safety consequences.

H. Access-to-courts and record-access burden

- The Kings have repeatedly sought transcripts, service records, reporter information, and conformed copies in order to pursue appellate or supervisory review.
- The supplemental Commission filing makes the missing second portion of the Nov. 14 transcript a central issue because, without it, Shunte says neither the Commission nor counsel can fully evaluate the contempt sequence or the medical emergency.
- The inability to obtain a complete record has itself become part of the harm: years of time spent trying to reconstruct what occurred, which version is official, who was served, and what was actually before the court.

5. Independent record points that make the complaint worthy of serious review

- Judge Richard's own Rule to Show Cause described Shunte as a “non-party” in the referenced matter.
- Attorney Schrumpf expressly stated in writing that he did not represent Shunte in contempt and that attempted service on him for her contempt matter was not effective.
- The later Rule itself establishes that a separate contempt-related proceeding involving John occurred on Nov. 14, 2024, beyond the ordinary civil trial record.
- The Third Circuit granted writ relief and held that the trial court had been divested of jurisdiction for the matters it reversed after the appeal order was signed.
- The Commission's Jan. 21, 2026 letter shows that Shunte's complaint was reviewed, separately assigned File No. 25-606, and Judge Richard was afforded an opportunity to answer.
- By Aug. 23, 2026, Shunte was submitting a detailed supplemental investigative memorandum under File No. 25-606 to a Commission judicial investigator.
- No closure disposition for 25-606 appears in the materials reviewed for this summary.

6. Selected chronology tying the status, claims, and consequences together

Date	Event / Consequence
Oct.-Nov. 2024	John seeks counsel and medical accommodation in 23-2124; filings document serious spinal/neurological limitations and a request for remote participation.
Nov. 14, 2024	Civil trial occurs. Shunte separately submits a crime-victim confidentiality request. Shunte reports a later medical crisis/seizure event involving John and a second contempt-related proceeding for which the complete transcript has not been produced.
Nov. 19, 2024	Rule to Show Cause signed against “SHUNTE KING (a non-party in the referenced matter)” and a contempt hearing is set.
Nov. 22, 2024	Court correspondence tells John that Shunte must communicate on her own contempt matter. John responds by raising lack of service, nonresidency, disputed addresses, approximately $850 in travel expense, and safety consequences. Schrumpf separately states that he does not represent either King in contempt.
Dec. 3, 2024	Devolutive appeal signed in 23-2124.
Dec. 11-12, 2024	Shunte's later filings identify a fatal home-intrusion incident as a major safety consequence and cite it in recusal/fear-for-life filings; emergency recusal materials follow.
Dec. 18-30, 2024	Schrumpf is ordered to appear despite disclaiming contempt representation; Dec. 30 hearing includes rescission of pauper status and additional orders/costs later challenged by writ.

Date	Event / Consequence
Feb. 6, 2025	Third Circuit grants relief, holding that the trial court had been divested of jurisdiction as to the matters it reverses, including rescission of pauper status and certain orders compelling counsel/setting motions.
2025	Shunte's filings describe continuing safety, counsel-access, record-access, and cross-case concerns while federal and ethics complaints are developed.
Dec. 3, 2025	Commission correspondence acknowledges Shunte's File No. 25-606 and requests supporting attachments/evidence.
Jan. 21, 2026	Commission confirms complaint review and assignment to File No. 25-606, states Special Counsel had not taken a position, and says Judge Richard was afforded an opportunity to answer.
Feb. 6, 2026	A warrant is issued in Case No. 24-5624 under a name Shunte later challenges on identity, address, and probable-cause grounds.
Feb. 23, 2026	Shunte files a consolidated ethics complaint and motions challenging the warrant and related process.
Aug. 23, 2026	Shunte submits a 32-page supplemental investigative memorandum to the Commission, seeking acquisition of the missing second Nov. 14 record before any conclusion.
Oct. 16, 2026	No Commission closure letter for File No. 25-606 is present in the records reviewed.

7. What Shunte is asking Dr. Matthews to understand and help accomplish

- Correct the status record: John King's 25-062 disposition must not be attributed to Shunte King's 25-606 matter.
- Treat File No. 25-606 as a separate pending confidential Commission matter in investigatory review unless and until an official closure disposition says otherwise.
- Help place the record with Louisiana civil-rights counsel who can evaluate due process, access to courts, retaliation, contempt procedure, warrant validity, and disability-related court access.
- Help obtain independent appellate/criminal counsel for the service, non-party jurisdiction, contempt, missing-transcript, and 24-5624 warrant issues.
- Encourage counsel to obtain primary records directly: complete Nov. 14 audio/transcript, courtroom/security records, service returns, cost ledgers, warrant affidavit, identity/address records, and all Commission correspondence.
- Keep Commission correspondence private. The Commission itself states that its proceedings are confidential; this packet is for Dr. Matthews and prospective counsel, not public dissemination.

8. Evidence classification - what is proven, what is alleged, what is still needed

Category	Examples	Treatment in this memo
Independent / documentary	Commission letters; Third Circuit ruling; Rule to Show Cause; Schrumpf correspondence; appeal papers; court email chain.	Stated directly.
Shunte / King contemporaneous assertion	Medical-crisis details, inability to leave, address-danger consequences, some intimidation and retaliation allegations.	Attributed to the Kings; not converted into findings.
Broader coordination allegations	Cross-case conspiracy, school influence, contacts with institutions, property/asset forgery network.	Preserved as allegations requiring independent proof.
Missing evidence to obtain	Complete second Nov. 14 record, security/EMS records, warrant affidavit, service returns, address audit trail, institutional-contact records.	Flagged for counsel/Commission acquisition.

9. Primary source anchors for advocate review

- Judiciary Commission of Louisiana correspondence to Shunte King, Dec. 3, 2025 and Jan. 21, 2026, File No. 25-606.
- Judiciary Commission of Louisiana letter to John C. J. King, Mar. 28, 2025, File No. 25-062.
- Shunte King Supplemental Investigative Memorandum, Commission File No. 25-606, Aug. 23, 2026.
- Formal Consolidated Ethics Complaint, Commission File No. 25-606, Feb. 23, 2026.
- Judge Richard Rule to Show Cause / Shunte Contempt Hearing Notice, Nov. 19, 2024.
- Gmail - From Judge Ronald C. Richard re: King Contempt of Court, Nov. 22, 2024.
- Oliver “Jackson” Schrumpf correspondence and Motion to Be Excused, Nov.-Dec. 2024.
- Louisiana Third Circuit writ materials and ruling, CW 25-00044.
- Gmail proof of two transcripts / transcript-request correspondence regarding Nov. 14, 2024.
- Crime Victim Letter to Judge Richard, Nov. 14, 2024.
- Case No. 24-5624 warrant/quash materials and related service documents.
- Federal civil-rights filing package identifying claimed physical, financial, psychological, family, educational, and access-to-courts injuries.

BOTTOM LINE FOR DR. MATTHEWS

Shunte King is not asking an advocate to assume that every allegation is true. She is asking that her own Commission File No. 25-606 be accurately recognized as separate from John's closed/no-inquiry File No. 25-062, that the documented appellate and court records be read together with the missing and disputed evidence, and that the human cost - fear for safety, loss of privacy, interstate travel, legal and financial depletion, family strain, reputational harm, contempt exposure, and later warrant exposure - not be reduced to a procedural footnote. The record is substantial enough to warrant independent legal review before any further contempt, warrant, or related proceeding is allowed to define what happened.

CIVIL-RIGHTS ADVOCACY EVIDENCE BRIEF

Prepared for Dr. Candice Matthews

John C. J. King, Sr. and Shunte King

Advocacy and attorney-referral review | October 16, 2026

PURPOSE OF THIS PACKET

To make a scattered multi-case record digestible for an independent civil-rights advocate and prospective counsel. This brief uses selected chronology plus underlying filings, emails, orders, appellate papers, docket material, and evidence summaries. It is not a substitute for the full repository and is not a court pleading.

EVIDENTIARY METHOD

Every major point is classified as documented, reported/alleged, disputed, or requiring additional source verification. A chronology entry is not treated as proof by itself. Where a filing contains an accusation, the brief identifies it as an allegation unless another source independently corroborates it.

CONFIDENTIALITY

This packet concerns family-court matters, medical information, warrants, minors, and potentially sensitive investigative records. Public distribution should use a redacted version. The evidence repository should not expose minor children, home addresses, medical details, or confidential police material.

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1. Executive Summary

John and Shunte King are seeking independent review of a record that spans property disputes, Lake Charles City Court proceedings, a family-court docket in the Fourteenth Judicial District Court, contempt and warrant issues, appellate proceedings, court-cost and record-access disputes, disability-access concerns, and a federal civil-rights action. The Kings maintain that the matters are connected by a pattern of retaliation and procedural obstruction. This brief does not assume that conclusion; it organizes the record so an independent reviewer can test it.

The strongest presently documented questions are not dependent on accepting every allegation. They include: a vehicle/notarial case in which appellate counsel later described a trial finding that John was not in Lake Charles on the date the notary claimed to have notarized his signature; repeated difficulty obtaining counsel in the weeks before the November 2024 trial; a later appeal and post-appeal jurisdiction dispute; years of written objections in the family-court matter asking what contempt or merits were actually being tried; conflicting explanations in October 2026 about why filed motions had not reached the expected judge; and documented medical and neurological limitations during periods when in-person participation was being demanded.

The most serious accusations - including forged or altered court orders, stolen real and financial assets, intimidation of attorneys and school personnel, cross-case coordination, retaliatory warrant activity, and institutional overlap through Lake Charles College Prep - require targeted source verification. They are included because they are central to what the Kings want investigated, not because this packet treats them as adjudicated facts.

What the Kings are asking Dr. Matthews to help accomplish

- Connect the family with Louisiana civil-rights counsel experienced in Section 1983, due process, retaliation, access-to-courts, and court-administration issues.
- Connect the family with Louisiana appellate/nullity counsel for the state-court judgments, contempt proceedings, recusal issues, and supervisory review.
- Connect the family with criminal-defense counsel to obtain and review the warrant affidavit and probable-cause materials in 14th JDC No. 24-5624.
- Help identify a lawyer or forensic reviewer capable of auditing disputed court orders, docket history, service records, transcript-to-judgment discrepancies, and court-cost ledgers.
- Help identify an ADA/public-entity lawyer to review remote-access, medical-accommodation, and effective-participation issues.
- After counsel review, help identify responsible public-accountability or media channels for verified, non-confidential evidence.

Evidence classification key

Classification	Meaning
DOCUMENTED	Supported by a primary record such as an order, docket entry, email, transcript, return, or attorney filing.
REPORTED / ALLEGED	A specific statement by John, Shunte, or another declarant that has not yet been independently established.
DISPUTED	The record contains competing versions or materially inconsistent administrative explanations.
REQUIRES SOURCE	The event is important but the original supporting record is not currently available in the working set.

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2. Visual Case Map

This page is deliberately simplified. It shows the major branches Dr. Matthews and prospective counsel should keep separate while examining possible overlap.

PROPERTY / INVESTIGATIONS

- Vehicle/title and notarial dispute involving Renee Amos
- Vehicle investigation identified as 2021-00123665
- Additional alleged forged transfers: event center, banking/investments, other assets - source verification still required
- Ross Murray recording(s), confidential police material, Princeton Jackson incident, Jarvis Reynaud communication - preserve as investigative leads unless primary source confirms content

LAKE CHARLES CITY COURT

- 23-1206 - King v. Colston; reported Shunte contempt/service issues; Judge Bice assignment to be verified from certified docket
- 23-2124 - King v. Amos / Hartford; vehicle-notary dispute; counsel-access issues; medical/Zoom dispute; Nov. 2024 trial; appeal; post-appeal cost/contempt activity

14TH JDC / FAMILY COURT

- 2021-2773 - King v. Colston
- Rhonda Verzwyvelt / Xann LaBove communications; Lakoshia Roberts disputed enrollment; Orelia Lawdins-Trent; March/July 2024 judgment drafting; Feb. 2026 ad hoc proceedings; Sept. 2026 trial-setting dispute

CRIMINAL / APPELLATE / FEDERAL

- 24-5624 - later warrant/criminal matter; obtain warrant affidavit and probable-cause record
- 24-118583 - impersonation investigation identified in complaint materials
- CA-25-0049 - Third Circuit proceeding
- 2:25-cv-01759 - federal civil-rights action

Core review question

DO THESE TRACKS MERELY OVERLAP, OR DO PRIMARY RECORDS SHOW ACTUAL CROSS-CASE COORDINATION?

The packet should not answer this by assumption. It should test communications, dates, court assignments, service records, attorney contacts, school/institutional relationships, and subsequent enforcement actions.

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3. Case and Investigation Directory

Number	Forum	Matter	Current use in this brief
2021-00123665	Louisiana investigation	Vehicle investigation	Property/notarial origin track; underlying file needed for full audit.
23-1206	Lake Charles City Court	King v. Colston	Reported Shunte contempt/service branch; certified docket needed to verify judge, service and disposition.
23-2124	Lake Charles City Court	King v. Amos / Hartford	Primary City Court track: vehicle/notary case, counsel access, medical accommodations, trial, appeal, costs.
2021-2773	14th JDC, Calcasieu	King v. Colston	Family-court track: service, contempt, judgment drafting, access, recusal, current trial-setting disputes.
24-118583	Investigation	Impersonation investigation	Referenced in consolidated complaint; underlying investigative file should be obtained.
24-5624	14th JDC	Criminal / warrant matter	Warrant and probable-cause basis disputed; obtain affidavit and charging record.
CA-25-0049	Louisiana Third Circuit	King v. Amos / Hartford appellate matter	Review appellate jurisdiction and disposition.
2:25-cv-01759	W.D. Louisiana	Federal civil-rights action	Federal vehicle for constitutional/civil-rights allegations.
25-062	Judiciary Commission file	Complaint against Judge Ronald Richard	Commission acknowledged complaint and declined to open inquiry on that submission.
25-606	Ethics / consolidated complaint file	Later consolidated complaint	Contains cost analysis, warrant and procedural allegations; allegations remain to be independently tested.

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4. Selected Chronology - Key Milestones Only

This is not the complete timeline. It highlights events that organize the record and show where independent counsel should drill down.

Date	Event	Why it matters
2021	Property / investigation origin	John reports vehicle and property losses involving disputed transfers and notarizations. The vehicle investigation is identified as No. 2021-00123665. Additional asset allegations - including a family event center and financial assets - require original deeds, banking records and investigative files.
Summer 2022	Early family-court chronology	The 2021-2773 chronology must begin here. Later sworn and contemporaneous statements allege disagreement over what had been stipulated and what matters remained pending. Primary summer-2022 records should control.
May-June 2023	Roberts / Lawdins / evidence-access disputes	John later alleged Lakoshia Roberts was treated as enrolled or acting for him under circumstances he disputes. On June 27, 2023, Rhonda Verzwyvelt told John that recordings would not be considered that day and could be reviewed only if introduced live at trial; Xann LaBove was copied.
Mar-Jul 2024	Family-court judgment drafting	A March 26 stipulation was later memorialized in a July 1 judgment. Rule 9.5 materials show an objection was recorded as "unclear" while Dustan Abshire's office was obtaining the transcript to compare it with the proposed judgment. Baleigh Conner later documented specific drafting questions. This is the core record-integrity comparison track.
Jul-Nov 2024	23-2124 intensifies	Kamie Dominic advised John she had been retained by Hartford. Multiple lawyers were contacted. Joseph Burke later said the City Court Clerk told him motions in limine, sanctions and trial were all set for November 14; he declined representation. The Kings continued trying to obtain counsel under tight deadlines.
Nov. 14-21, 2024	King v. Amos trial and judgment	The City Court judgment dismissed the case with prejudice. Appellate counsel later challenged the proceedings and sought review. The Kings report that John experienced a seizure on the courtroom floor; medical evidence elsewhere documents seizure/neurological problems, but the courtroom event should be proved through transcript, witnesses or medical timing.
Dec. 2024	Appeal and post-appeal dispute	A devolutive appeal was granted. Schrumpf later wrote that Judge Richard ordered him to appear in later matters even though he said he did not represent the Kings on newly filed pleadings or contempt matters. Post-appeal jurisdiction, IFP status, court costs and contempt became major issues.
Dec. 4, 2024	Family-court "what is being tried?" objection	John asked Rhonda in writing what matter was being tried, who was the defendant, and where the certificate of service was. Rhonda identified a Sept. 6, 2022 contempt/fees motion and ultimate imposition of costs. John immediately disputed the service and validity of that theory.
Mar. 28, 2025	Judiciary Commission response	The Commission acknowledged complaint file 25-062 against Judge Richard but said the submission

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Date	Event	Why it matters
		did not allege misconduct within its jurisdiction and no inquiry would be opened. It directed legal-error issues toward court remedies.
Jan-Feb 2026	Ad hoc / medical-access conflict	Breanne Istre first identified a Feb. 10 hearing on the recusal motion. On Feb. 6, the same date was described as a Zoom conference to select a date to reset the recusal motion; later communication required physician confirmation or the hearing would proceed in John's absence. This discrepancy is central to notice and access review.
Feb. 6, 2026	Warrant issue	The Kings identify 14th JDC No. 24-5624 as the warrant/criminal matter. The warrant affidavit and probable-cause materials remain essential missing primary sources.
Sept-Oct 2026	Undefined trial and filing-routing conflict	John again asked the family court to identify what claims and Rules actually remained for trial. On Oct. 5, chambers said documents appeared held for costs and had not reached the judge. On Oct. 6, Clerk leadership said the Clerk was holding nothing, pauper status was active, and the documents were with Law Clerk/Div F awaiting the ad hoc judge's live signature.
Jan. 2027 setting	Current urgency	A pretrial/trial setting remained on the horizon while service, assignment, exceptions, contempt status, ADA issues and the identity of the actual merits remained disputed.

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5. Property, Notarial, and Investigation Track

Why this matters

The Kings describe the court disputes as beginning with efforts to recover property and challenge transfers they believed were unauthorized or supported by false notarizations. The clearest presently documented state-court branch is 23-2124, King v. Amos / Hartford.

Documented anchor

The 23-2124 judgment shows that John sued Renee Amos, identified as a notary public, and that the City Court dismissed his petition with prejudice after the November 14, 2024 trial. Appellate counsel later pursued a devolutive appeal. [E-01]

The appellate papers are especially important because they are counsel-generated rather than merely pro se accusations. The writ package records the judgment, appeal, later hearings, and counsel's objections to the court's authority over post-appeal matters. [E-02]

Additional property allegations requiring verification

- Additional stolen vehicles or title transfers beyond the vehicle at issue in 23-2124.
- An alleged forged transfer affecting John's grandfather's event center or other family real property.
- Bank, investment, or other financial assets allegedly moved, opened, or used under John's identity without authorization.
- Confidential police reports reportedly provided to John by his then-minor daughter.
- A reported incident in which Princeton Jackson was found behind John's brother's residence.
- A reported communication from Jarvis Reynaud concerning Renee Amos and people "higher up"; the Kings also report Reynaud said he had been set up. Primary recording/call metadata should control.

ADVOCACY POSITION

These allegations should not be omitted simply because the originals are still being assembled. They should be presented as defined investigative leads, each with a source-status field: original available, copy available, witness only, audio available, or source missing.

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6. Lake Charles City Court No. 23-2124 - Richard Track

Counsel access before trial

Joseph Burke of Sanchez Burke wrote on October 31, 2024 that, after reviewing materials and the case history, he could not accept representation. He also said the City Court Clerk told him the case was set for motions in limine, sanctions, and trial on November 14. Burke later clarified that he was simply relaying docket information from the Clerk and did not know the substance of the motions or sanctions. [E-03]

Separately, the Kings had a Google Meet intake through Gabe Duhon's office on October 23. By October 28, Shunte was writing that the family was running out of time to issue subpoenas and had been waiting for a response; the office replied that Ike would reach out. The record documents urgency and difficulty securing representation, but it does not yet establish that the court caused the lawyers to decline. [E-04]

Medical access and the November 2024 proceedings

The Kings' filings repeatedly asserted severe neurological and spinal limitations, inability to fly safely, and the need for remote participation. Later family-court filings also cite a University Hospital neurology order using a seizure diagnosis and counsel correspondence describing serious spinal injuries and neurological impairment. [E-05]

John and Shunte report that John experienced a seizure on the courtroom floor during the Judge Richard proceedings. This should be treated as a major human-impact event but separately sourced: courtroom transcript/minutes, attorney observation, witness statements, contemporaneous messages, and medical timing should be collected so the advocacy brief can distinguish the reported courtroom event from the broader documented seizure history.

Appeal and post-appeal dispute

The City Court judgment was signed November 21, 2024 and a devolutive appeal was granted in early December. Schrumpf later filed papers stating that Judge Richard telephoned him and ordered him to appear at a December 30 hearing even though Schrumpf protested that he did not represent the Kings on newly filed pleadings or contempt matters. Schrumpf argued that the appealed judgment was outside the trial court's continuing authority except for limited matters. [E-02]

The consolidated complaint later highlighted a sharp increase in court costs around December 30, including an approximately $5,000 concentration and an $800 transcript charge. Those figures come from complaint materials and should be checked against a certified City Court cost ledger before being presented as final amounts. [E-06]

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7. Counsel-Access / Attorney-Interference Review

The key question is not whether John and Shunte had difficulty finding counsel - the record clearly shows repeated efforts. The key question is whether the lawyers themselves described court or Clerk conduct that changed their willingness or ability to enroll.

Attorney / firm	Documented contact	Court/Clerk information	Outcome	Current evidentiary value
Joseph Burke / Sanchez Burke	Reviewed materials; Oct. 31 email	Said Clerk reported motions in limine, sanctions and trial for Nov. 14; later said he was only relaying docket information	Declined representation	Strong original attorney email; does not by itself prove intimidation.
Gabe Duhon / Vermilion Lawyers	Oct. 23 Google Meet intake; paid consultation referenced	No direct court statement located in the current source set	No enrollment shown; family continued seeking answers under deadline pressure	Documents access difficulty and timing; causation unresolved.
Ike Funderburk / same office	Copied on intake; office said he would reach out	No primary statement from him located yet	Unclear	Needs direct email, note, or testimony.
Oliver "Jackson" Schrumpf	Enrolled for appeal / 23-2124; authored writ-related papers	Personally objected that he did not represent the Kings on later contempt/new pleadings	Continued appellate representation; challenged order to appear	Very high-value attorney-authored record.
Other attorneys referenced in 23-2124 exhibits	Kings state correspondence existed from multiple lawyers	Kings allege some encountered misinformation or discouraging Clerk comments	Mixed / incomplete	Original emails must be individually extracted before any interference conclusion.

WHAT WOULD TURN THIS FROM "DIFFICULTY FINDING COUNSEL" INTO A CIVIL-RIGHTS ISSUE?

A direct attorney statement that court or Clerk personnel discouraged enrollment, supplied materially false information, threatened consequences, withheld the record, or otherwise interfered with representation - especially if the statement can be linked to a subsequent change in the attorney's willingness to act.

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8. 14th JDC No. 2021-2773 - Family-Court and Record-Integrity Track

June 2023 - evidence access

On June 27, 2023, John asked Rhonda Verzwyvelt and Xann LaBove how to provide audio and video recordings to Judge Redd. Rhonda responded that the recordings would not be considered that day and that the judge or staff could review them only if introduced into evidence at trial; she later instructed that evidence should be introduced live subject to objections. [E-07]

March-July 2024 - transcript-to-judgment comparison

The judgment-drafting history is one of the most important record-integrity tracks. The Rule 9.5 certificate in the circulated judgment materials marks an objection as "unclear" and notes that Dustan Abshire's office had ordered the transcript to compare it with the proposed judgment. Later correspondence from Baleigh Conner documented specific drafting questions and revisions. [E-08]

The correct advocacy presentation is not "the judgment is forged" as a conclusion. It is a side-by-side forensic comparison: transcript -> first draft -> objections -> revised draft -> filed copy -> signed copy -> notice. Any unexplained material change should then be classified as clerical, authorized judicial revision, disputed change, or possible falsification requiring forensic review.

December 2024 - repeated request to identify the matter

John repeatedly asked what matter was actually being tried and where the service proof was. In the December 4 email chain, he asked, in substance, what was being tried, who the defendant was, and where the certificate of service was. Rhonda responded by identifying Colston's September 6, 2022 contempt/attorney-fee motion and ultimate imposition of costs. John immediately disputed service and the legal viability of that theory. [E-09]

February 2026 - ad hoc / notice / access

The February 2026 correspondence contains a material notice/access issue. A January 29 email said Judge H. Ward Fontenot had been appointed ad hoc to hear the verified recusal motion and set February 10 at 9:00 a.m. A February 6 email then described February 10 as a Zoom conference "for the purpose of selecting a date to reset the Motion to Recuse." Later the court required written physician confirmation of the condition preventing attendance or said the recusal hearing would proceed in John's absence. [E-10]

This does not establish improper intent. It does establish that the record should be examined for whether the event was adequately described, whether a Zoom link was supplied, what medical proof was received, and whether John had a meaningful opportunity to participate before the motion was dismissed with prejudice.

September-October 2026 - filings, assignment and "held for costs" conflict

John's September motion asked the court to identify the claims and issues remaining for adjudication and to suspend or extend discovery deadlines. [E-11]

On October 5, Judge Redd's office wrote that the Clerk website appeared to show the documents were being held for costs and had not been sent to the judge. On October 6, Michelle Jordan, relaying Civil Processing Supervisors, wrote that the Clerk was not holding anything, pauper status was being honored, the documents were with the Law Clerk/Div F, Ad Hoc Judge Fontenot was over the case, and Division A had apparently misinterpreted the internal screen. [E-12]

WHY THIS IS IMPORTANT

This is a documented administrative discrepancy, not merely a party accusation. An independent reviewer can ask for the internal routing/audit trail and determine exactly where the filings were, who was assigned, and why two offices gave materially different explanations within approximately one day.

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9. Lawdins, Rhonda, Xann, Roberts, and Cross-Case Coordination Allegations

Orelia Lawdins-Trent

Lawdins appears throughout the 2021-2773 record as opposing counsel and is central to the Kings' allegations concerning contempt, judgment drafting, service, and later interstate activity. The packet should not describe her as Judge Richard's operative or say she was "doing his dirty work" as a fact. Instead, every alleged connection should be tested by date, communication, appearance, payment record, filing, or witness statement.

Rhonda Verzwyvelt and Xann LaBove

The record includes direct staff emails and therefore permits a much stronger chronology than a generalized accusation. Rhonda's June 2023 evidence instructions, December 2024 identification of the contempt theory, and October 2026 routing explanation are all primary correspondence. Xann is copied on key 2023 communications and should be indexed wherever she participated. The question is what staff communicated, what action followed, and whether later records are consistent with those communications.

Lakoshia Roberts

John alleges a disputed enrollment/representation sequence involving Roberts, including that her formal enrollment occurred after she had already acted in a hearing. The October 2026 preservation complaint repeats that allegation and says a Clerk employee had supplied timestamped evidence. This is not yet an adjudicated fact. The correct proof set is: consultation/retainer -> notice of possible enrollment -> motion/order to enroll -> Clerk timestamp -> hearing transcript -> withdrawal/termination communications. [E-13]

CROSS-CASE METHOD

For every alleged connection among Richard, Lawdins, Colston, Amos, Roberts, Rhonda, Xann, City Court staff, 14th JDC staff, or LCCP personnel, create a row with: date; who communicated; source; case number; what changed afterward; and whether the source proves contact, coordination, motive, or merely temporal overlap.

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10. Warrant, Investigative Leads, and Alleged Retaliatory Escalation

14th JDC No. 24-5624

The Kings identify this as the later criminal/warrant matter involving Shunte. Consolidated complaint materials connect it to disputed identity, contempt, and warrant questions. The most important missing evidence is not another narrative - it is the warrant application, affidavit, probable-cause statement, charging instrument, service record, and any transcript or referral that generated the criminal process. [E-14]

Jarvis Reynaud and Princeton Jackson

The Kings report that Jarvis Reynaud contacted them regarding Renee Amos, warned that people "higher up" did not want Amos held accountable, and indicated that he had been set up. They also report a later incident involving Princeton Jackson behind John's brother's house. These are important leads but remain allegation-level in the current working set. The original recording, call metadata, witness statement, incident report, and exact date should be preserved before any public claim of retaliation or conspiracy.

Temporal relationship - not causation

The advocacy packet should show the sequence of investigative communications, threats or warnings, contempt activity, and the February 2026 warrant on a single timeline. The visual should explicitly label the link "temporal relationship requiring investigation" unless a primary record proves causation.

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11. Court Costs, Missing Payment Credits, and Record Access

City Court costs

The consolidated complaint compares routine early fees in 23-2124 with a later concentration of approximately $5,000 and an $800 transcript charge around the December 30, 2024 period. Because that document is itself a complaint, the final Matthews packet should attach or link the certified City Court cost ledger and transcript invoice before treating the amounts as conclusively established. [E-06]

Child-support payment accounting

The Kings maintain that years of payments are missing from official accounting even though their records show payments were mailed or transmitted using instructions supplied by case management. A user-created payment compilation lists a large volume of payments across multiple years. That spreadsheet is useful as an index but is not a substitute for an official reconciliation. [E-15]

The correct evidentiary product is a month-by-month ledger matching amount due, amount sent, payment instrument, mailing or transmission address, delivery/clearing proof, credit posted, arrears change, and official agency ledger entry.

April 2026 record-access allegations

John reports that while trying to assemble a record for supervisory writs he was denied meaningful information about the court reporter, was told the reporter was "Minnie Mouse," and received exhibits that had been blacked out or otherwise rendered unusable. The underlying April 2026 source documents are not presently in the accessible working set. This should therefore appear as a defined source gap, not an established fact, until the original emails/screenshots/record copies are re-uploaded or retrieved from the repository.

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12. LCCP / School and Institutional-Overlap Leads

The Kings report that Judge Ronald Richard served on or was associated with the Lake Charles College Prep governing board while John's children attended the school, and that he or an affiliated entity sponsored LCCP baseball while John's son was on the team. They further allege that this relationship was used to bully or intimidate teachers, lawyers, or other adults, including people identified as Sanchez and Burke.

These claims should be investigated, but the current working set does not yet contain the primary board roster, board minutes, sponsorship documentation, team materials, or direct statements from Sanchez, Burke, teachers, coaches, or administrators establishing intimidation. This section should therefore be labeled "Potential Institutional Overlap Requiring Independent Review."

- Obtain archived LCCP board rosters, minutes, nonprofit/governance records, and school newsletters for the relevant dates.
- Obtain baseball sponsorship advertisements, booster materials, team programs, photographs, or payment/donation records.
- Confirm the dates John's children attended and the dates of his son's baseball participation, while protecting minors in any public version.
- Locate direct communications from Sanchez, Burke, school staff, coaches, or administrators describing any pressure or change in willingness to assist.
- Do not infer coercion solely from institutional proximity; look for communication plus change in conduct plus case impact.

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13. Human Impact - Why an Outside Reviewer Should Care

The human story should be told with restraint. The persuasive force comes from the contrast between what the Kings say they were trying to do - recover property, obtain counsel, participate remotely while medically compromised, submit evidence, understand what was being tried, and obtain appellate review - and what the record shows happened next.

Property loss and identity concerns

The Kings describe discovering vehicle and other asset transfers they believed were unauthorized or supported by disputed signatures/notarial acts. The 23-2124 litigation grew out of that property dispute.

Difficulty securing counsel before a fast-moving trial

The record shows multiple contacts with lawyers in October-November 2024 while deadlines and a November 14 trial approached. Burke's original email and the Duhon/Vermilion correspondence make the timing concrete.

Neurological and spinal crisis during litigation

Medical filings document seizure/neurological issues and serious spinal limitations. John and Shunte report a seizure on the courtroom floor. The courtroom event needs direct proof, but it should not be buried because it explains the urgency of the accommodation requests.

Spouse drawn into contempt and warrant exposure

The Kings report that Shunte became the subject of contempt and later warrant-related proceedings arising from disputes that began with John's cases. Certified 23-1206 and 24-5624 records are essential to test that sequence.

Years of asking what was actually being tried

The family-court emails document repeated efforts to identify the operative contempt or merits, service, and status of John's own filings. This is not merely a recent objection.

Record-access and cost pressure

The family reports substantial litigation costs, transcript costs, disputed support accounting, and difficulty assembling records for writ review. These issues can materially affect access to counsel and appellate remedies.

THE ASK

The Kings are not asking an advocate to adopt their conclusions. They are asking someone independent to help place the right records before lawyers who can determine whether the documented sequence supports due-process, ADA, retaliation, access-to-courts, nullity, contempt-procedure, warrant, attorney-misconduct, or other civil-rights remedies.

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14. Questions for Independent Counsel

1. What did the 23-2124 trial court actually find regarding John's physical presence and the challenged notarization, and how did that finding relate to dismissal of the claim?

2. What jurisdiction did the City Court retain after the devolutive appeal, and were the December 2024 orders, counsel directives, IFP decisions, contempt-related steps, and costs within that retained authority?

3. Do the original attorney emails show ordinary case-selection decisions, or do any lawyers personally describe Clerk/court conduct that materially interfered with representation?

4. Did the 2021-2773 March/July 2024 judgment materially depart from the transcript or circulated terms, and if so, were the changes authorized and properly documented?

5. What contempt Rules in 2021-2773 were actually signed, served, pending, tried, or disposed, and why was John repeatedly unable to identify the operative theory?

6. Was the February 10, 2026 ad hoc proceeding described and noticed in a manner that provided meaningful participation, particularly given the conflicting "hearing" and "Zoom conference to select a date" language?

7. What exactly happened to the September 22, 2026 filings, why did Division A and Clerk leadership give different explanations, and what does the internal routing/audit trail show?

8. What is the factual and legal basis for the 24-5624 warrant, and how does it relate - if at all - to earlier contempt or civil proceedings?

9. Can the claimed missing support payments and court costs be independently reconciled against certified agency and court ledgers?

10. Do primary records substantiate the alleged LCCP institutional overlap and any resulting intimidation of teachers, lawyers, coaches, or other potential helpers?

11. What public-entity ADA obligations applied to the remote-access and medical-accommodation requests across the state-court proceedings?

12. Which issues belong in direct appeal, supervisory writ, nullity, recusal, criminal defense, administrative review, attorney discipline, judicial discipline, or federal civil-rights litigation?

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15. Requested Assistance from Dr. Matthews

The immediate goal is not to make Dr. Matthews the lawyer on every case. The goal is to use her advocacy network and public-accountability experience to get the record in front of the right independent professionals.

- Louisiana civil-rights counsel with federal Section 1983, retaliation, court-access, and municipal/state-actor experience.
- Louisiana appellate/nullity counsel who can rapidly triage 23-2124, 2021-2773, CA-25-0049, recusal orders, contempt, and current trial settings.
- Criminal-defense counsel to obtain the 24-5624 warrant affidavit and evaluate the probable-cause and identity record.
- ADA/public-entity counsel to assess effective access and reasonable modification issues.
- A forensic document or court-record professional if the transcript-to-judgment comparison reveals unexplained material changes.
- A forensic accountant or child-support accounting specialist for the payment/arrears ledger.
- Court watchers or neutral observers for future public proceedings, where permitted.
- Journalists or public-interest organizations only after counsel has screened the material for confidentiality, privilege, minors, sealed records, and unsupported accusations.

REPOSITORY STRUCTURE

The evidence repository should be organized by case and issue, not by where the file originally lived. Every evidence item should carry an ID, date, case number, neutral description, source location, verification level, what it proves, and what it does not prove. Dropbox/Google Drive links can then be inserted behind the evidence IDs without making Dr. Matthews browse the entire archive.

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Appendix A - Working Evidence Index

This is a selected index for the advocacy brief. It is not yet the complete master evidence database.

ID	Source	Type	Use / limitation
E-01	Writ to 3rd Circuit (1).pdf / 23-2124 judgment and appeal materials	Primary/counsel record	Judgment, appeal, later court events; City Court procedural history.
E-02	Writ to 3rd Circuit (1).pdf - Schrumpf post-appeal papers	Attorney-authored filing	Schrumpf states he did not represent Kings on later contempt/new pleadings and challenges trial-court authority.
E-03	EXHIBIT SON OF CURRENT CANDIDATE... King V Amos, Lake Charles City Court.pdf	Original attorney email chain	Burke reviewed case, declined, relayed Clerk docket information; later clarified he did not know substance of motions/sanctions.
E-04	GABE DUHON... Only 48 hrs left to send out Subpoenas.pdf; 9:30 Google Meet Intake.pdf	Original law-office correspondence	Documents intake, consultation, urgent attempts to obtain help before deadlines.
E-05	King Motion 2773.pdf; 23-2124 medical filings	Court filings citing medical records	Documents seizure diagnosis / serious spinal and neurological limitations; not standalone proof of courtroom seizure.
E-06	25-606 FORMAL CONSOLIDATED ETHICS COMPLAINT (2).pdf	Complaint / secondary compilation	Cost spike and transcript-fee allegations; must be verified against certified ledger.
E-07	Rules 6_27_23 at 9_00 a.m. (10).eml	Original court-staff email chain	Rhonda/Xann evidence-submission instructions and 2023 chronology.
E-08	ed mar 2024 judgement from orelia.pdf; Baleigh/Dustan objection correspondence	Draft judgment / counsel correspondence	Rule 9.5 objection history and transcript-comparison concerns.
E-09	Rules 6_27_23 at 9_00 a.m. (10).eml - Dec. 4, 2024 chain	Original email chain	John asks what is being tried and requests service proof; Rhonda identifies Sept. 6, 2022 contempt/fees motion.
E-10	John King, Sr. v. Charmaine Colston_2021-2773 (5).eml	Original court-staff email chain	Jan. 29/Feb. 6 ad hoc scheduling and medical-access communications.
E-11	King Motion 2773.pdf - Sept. 22, 2026 filing	Filed/proposed motion	Requests identification of remaining issues and suspension/extension of discovery.
E-12	HELD FOR COST FULL EMAIL...pdf; Emergency Preservation email	Original Clerk/chambers correspondence	Oct. 5-6 conflicting explanations about routing, costs, pauper status, assignment.
E-13	Emergency Preservation complaint + Roberts-related attachments	Notice/allegation record	Preserves Roberts enrollment and record-integrity allegations; underlying timestamps/transcript needed.
E-14	25-606 complaint / 24-5624 references	Complaint / case reference	Identifies warrant issue and need for warrant affidavit; underlying criminal record required.
E-15	Complete 2025 King CS Payments 2021-2025...pdf/xlsx compilation	Party-created accounting compilation	Useful payment index; must be reconciled with official ledgers.
E-16	John C.J. King 25-062.pdf	Official Judiciary Commission correspondence	Commission acknowledged complaint and declined to open inquiry on that submission.

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Appendix B - Priority Source Gaps / Re-Upload List

Some older uploads are no longer directly accessible in the current working environment. These gaps do not erase the events; they determine which claims remain allegation-level until the original source is restored.

- Complete certified docket, Rules to Show Cause, service returns, minutes and judgment for Lake Charles City Court No. 23-1206, including the reported Shunte contempt and the identity of the presiding judge.
- Complete 14th JDC No. 24-5624 warrant application, affidavit, probable-cause statement, charging instrument, referral source, service/identity records, and disposition.
- Original Jarvis Reynaud recording/call log and any written follow-up; verify exact spelling, date, title/role, and statements.
- Original Ross Murray recording(s), separately identified by date and subject.
- Primary deed/title/notarial records for the grandfather's event center and any additional allegedly forged asset transfers.
- Bank/investment records showing allegedly unauthorized accounts, transfers, or money movement under John's identity.
- Confidential police reports reportedly supplied by John's then-minor daughter, handled under restricted access and not for public dissemination.
- Incident report, witness statement, photo/video, or other source for the Princeton Jackson incident.
- LCCP board/governance documents and baseball sponsorship records; direct statements from Sanchez, Burke, teachers, coaches, or administrators regarding any pressure or intimidation.
- April 2026 record-access communications, including the reported "Minnie Mouse" court-reporter statement and copies of allegedly blacked-out or unusable exhibits.
- Certified cost ledgers for 23-2124 and 23-1206, plus transcript invoice(s).
- Official Louisiana/DCFS and New Jersey payment ledgers needed to reconcile the Kings' payment compilation.

Repository note

Before external distribution, insert a controlled Dropbox or Google Drive link for the master repository and a separate redacted link for media/public-interest review. Do not use a single unrestricted folder for both purposes.

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Appendix C - One-Minute Advocacy Summary

WHAT DR. MATTHEWS SHOULD BE ABLE TO SAY TO A LAWYER

"I met with John and Shunte King. They have a multi-case Louisiana record that is difficult to understand in raw form, but there are enough primary documents to justify independent review. The strongest issues include a vehicle/notarial dispute, counsel-access problems, post-appeal jurisdiction and cost questions, repeated family-court service/merits objections, inconsistent filing-routing explanations, disability-access issues, and a later warrant that needs a probable-cause audit. Some of their most serious allegations - forged orders, additional stolen assets, institutional school overlap, and retaliation - still need source verification. I am not asking you to accept those conclusions. I am asking you to look at the organized record and determine what legal remedies are actually available."

Bottom line

This packet should make it possible for an outside lawyer to understand the architecture of the dispute without reading thousands of pages. The full chronology and source repository remain available for counsel who agrees to conduct the deeper review.

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SELECTED CHRONOLOGY OF REPORTED EVENTS

Focused milestones only – not a full timeline

Summer 2022

Early warnings, property concerns, and payment disputes

→ Reported threats escalated while John raised concerns about stolen vehicles, asset forgery, confidential police information, and missing payment credits.

↓

May–June 2023

Attorney-enrollment and service disputes

→ Disputes arose over Lakoshia Roberts' enrollment, notice, and whether opposing filings had merit or had been properly served.

↓

Nov–Dec 2024

Amos litigation, appeal activity, and contempt-related escalation

→ The stolen-vehicle / notarization case proceeded while John challenged fairness, counsel issues, costs, and post-appeal actions.

↓

Jan–Feb 2026

Contempt / access problems and warrant-related issues

→ Reported denial of remote participation, disability accommodations, hearing access, and later warrant exposure in contested proceedings.

↓

April 2026

Appellate-record and transcript access problems

→ John reports difficulty obtaining conformed copies, usable exhibits, and reporter information needed for supervisory-writ review.

↓

Sept 2026 – Jan 2027

Trial-setting and discovery disputes continue

→ Later notices and deadlines were challenged as unclear, ineffective, or premature while exceptions and service defects remained disputed.

Recurring themes

- property complaints followed by court escalation
- disputed notice and service
- disability-access barriers
- missing payment credits / arrears concerns
- repeated requests for review and corrective action

This page is a selected chronology for advocacy use and does not attempt to list every filing or event.

HARMS, MISSING FUNDS, AND EVIDENCE OVERVIEW

Summary for attorney and advocate review

Reported Harms

- loss of access to children and family disruption
- false contempt exposure and warrant-related stress
- financial harm from stolen vehicles and alleged forged transfers
- missing payment credits contributing to arrears disputes
- harassment of spouse, employers, and schools reported
- medical and disability strain during ongoing litigation

Evidence and Support

- emails with court staff and opposing counsel
- docket sheets, notices, judgments, and orders
- police reports and investigative materials
- audio recordings and witness accounts
- medical records and disability documentation
- payment records, mailing proof, and accounting documents

Questions for Reviewers

- Were service and notice legally effective?
- Did any orders differ from transcripts or circulated drafts?
- Were Zoom access and ADA accommodations improperly denied?
- Were contempt and warrant proceedings supported by proper notice and evidence?
- Can missing payments be reconstructed and credited accurately?
- Which matters belong in city court, district court, or administrative review?

Suggested Exhibit Buckets

Court Filings & Orders	Payment & Arrears Records	Police / Property Evidence	Medical / ADA Documentation
Pleadings, docket sheets, notices, judgments, and related orders.	Payment history, mailing proof, and accounting documents.	Police reports, investigative materials, and vehicle documents.	Medical records, disability documentation, and accommodation requests.

Supporting files may be organized separately in an exhibit repository or Dropbox folder.

Several items summarized here are reported events or allegations pending formal review and certification.

CASE MAP AND ISSUES OVERVIEW

Prepared for advocacy review – summary of reported events and filings

Property / Investigation Issues

- Stolen vehicles and alleged forged title transfers.
- Alleged forged notarizations involving vehicle and asset transfers.
- Grandfather's event center and other assets reportedly affected by forgery.
- Confidential police reports reportedly provided by John's then-minor daughter.
- Princeton Jackson reportedly found behind John's brother's house.
- Years of payments allegedly missing despite records showing mailings to the address requested by case management.

Court and Case Branches

14th JDC, Calcasieu Parish – No. 2021-2773 (King v. Colston)
family / child-support disputes

↓

Lake Charles City Court – No. 23-1206 (King v. Colston)
related city-court dispute; alleged contempt issues involving Shunte King

↓

Lake Charles City Court – No. 23-2124 (King v. Amos / Hartford)
stolen vehicle / notarization dispute

↓

14th JDC – No. 24-5624
later criminal / warrant matter challenged as retaliatory

↓

U.S. District Court, W.D. Louisiana – No. 2:25-cv-01759
federal civil-rights action

Reported Procedural Concerns

- Motions allegedly blocked or not reaching the judge.
- Ineffective or disputed service / notice.
- Disputed judgments or altered orders alleged.
- Denial of Zoom access and ADA accommodations.
- Threats, retaliation, and false contempt allegations.
- Docket confusion and switched or misdirected proceedings alleged.
- Missing payment credits contributing to arrears disputes.

Key Theme

The reported pattern is that property-crime complaints and related advocacy were followed by overlapping court actions, disputed service, access barriers, and escalating contempt or warrant exposure.

This visual summarizes allegations and reported events from case materials provided by the parties; dates, assignments, and underlying facts should be verified against certified records.

COST DISCREPANCY ANALYSIS
Lake Charles City Court

Category	Case No. 23-2124 King v. Amos	Case No. 23-1206 King v. Colston
Early 2024 Baseline Costs	February 23, 2024 certified copy request: $29.00 [1]	Routine filing and service fees only; no comparable escalation
November 14 and December 30, 2024 Activity	Approximately $5,000.00 imposed December 30, 2024 [2] $800.00 transcript charge [3]	No comparable single day cost spike
Service and Address Entries	Service fees entered at Iowa, Louisiana address under 'Shunte King' [4]	Standard service entries; no address irregularity reflected

Footnotes:

[1] February 23, 2024 entry: Request for certified copies, total cost $29.00.

[2] Cost ledger reflects approximately $5,000.00 assessed December 30, 2024 in Case No. 23-2124.

[3] Transcript preparation fee of $800.00 reflected in cost bill.

[4] Service entries reflect Iowa, Louisiana address not associated with domicile, raising equity concerns under La. C.C.P. art. 1920.

Your case may be heard in-person or remotely. To find out how your Final Restraining Order will be held, upon receipt of this order, you must immediately contact the Family court. For your convenience, all county Family Court numbers are listed below. All restraints remain in full force and effect until the final hearing.

Family Court County Phone Numbers

Atlantic	609-402-0100 x47580
Bergen	201-221-0700 x25185
Burlington	609-288-9500 x38834
Cape May	609-402-0100 x47710
Camden	856-650-9100 x43520
Cumberland	856-878-5050 x15640
Essex	973-776-9300 x57210
Gloucester	856-878-5050 x15520
Hudson	201-748-4400 x60830 201-748-4400 x60810
Hunterdon	908-824-9750 x13350
Mercer	609-571-4200 x74402
Middlesex	732-645-4300 x88560
Monmouth	732-358-8700 x87211 732-358-8700 x87160
Morris	862-397-5700 x75250
Ocean	732-504-0700 x64090
Passaic	973-653-2910 x24624
Salem	856-878-5050 x15881
Somerset	908-332-7700 x13007
Sussex	862-397-5700 x75184
Union	English: 908-787-1650 x21710 Spanish: 908-787-1650 x21720
Warren	908-750-8100 x13480

Go to "https://www.njcourts.gov/forms/12751_prepare_dvtro_hearing.pdf?c=0LD" to view "Preparing for a Domestic Violence Final Restraining Order Hearing" instructions.

New Jersey Judiciary
Family Practice Division

Preparing for a Domestic Violence Final Restraining Order Hearing

The information in this document provides basic, consistent information and guidance to both the plaintiff and defendant on what to expect when attending a Final Restraining Order (FRO) hearing. The information was combined under one document because some of the material concerns both parties. In addition, in the interest of transparency, each party will know what information is given to the other.

Once a domestic violence Temporary Restraining Order (TRO) is granted by a Superior Court or Municipal Court judge, a FRO hearing is scheduled before a Family judge in the Superior Court. Both the plaintiff and defendant will need to prepare for FRO hearing. In this court, domestic violence cases are civil cases and not criminal offenses. In these cases, the court will apply the civil standard or burden of proof rather that the criminal standard of proof which is beyond a reasonable doubt. The burden of proof in these cases is by the preponderance of the evidence. This means the person must show evidence to prove their claim and the level of evidence they must show to do so (*the civil standard* requires a 51% or greater probability while *the criminal standard* requires closer to 100%). The plaintiff (the person who filed the TRO application) has the burden of proof at the FRO hearing.

You **must** attend the final hearing. You have the right to bring an attorney; the court cannot provide an attorney for you.

If you are the plaintiff, you must attend the final hearing, even if you decide to dismiss the restraining order. The FRO hearing might take place remotely over a video platform, such as Zoom or Teams (see Domestic Violence Remote Hearing Instruction Sheet for Litigants), or you might be asked to appear in person at the courthouse. If you need to amend only your complaint, prior to the FRO hearing, you may file an Application to Amend Domestic Violence Complaint and submit the amended complaint through the Judiciary Electronic Document System (JEDS). If you need to amend the order prior to the FRO hearing please contact the Family Division where your case is being heard.

You will need to prepare yourself, and any witnesses you might have for the FRO hearing. If you have any evidence you wish to present at the hearing, for example, photos, text messages, video, etc. you must contact the court prior to the hearing for instructions on providing this evidence.

- Children should not be brought to the final hearing unless otherwise instructed by a judge to do so. If you have children and are going to ask the court for child support, please bring or have available your most recent pay stub, childcare costs, and tax return.
- If you are unemployed and receiving benefits from employment or disability, please bring proof.
- Failure to appear at your scheduled time might result in your case being postponed to another day and/or time, or your case might be dismissed.

If you are the defendant, you must attend the hearing even if the plaintiff is going to dismiss the restraining order. This hearing might take place remotely over a video platform, such as Zoom or Teams (see Domestic Violence Remote Hearing Instruction Sheet for Litigants), or you might be asked to appear in person at the courthouse. If you wish to appeal your TRO you may file an Application for Appeal and Order.

You will need to prepare yourself, and any witnesses you might have for the hearing. If you have any evidence you wish to present at the hearing, for example, photos, text messages, video, etc. you must contact the court prior to the hearing for instructions on providing this evidence.

- Children should not be brought to the final hearing unless otherwise instructed by a judge to do so. If you have children, child support might be ordered in the restraining order. Please bring or have available your most recent pay stub and tax return.
- If you are unemployed and receiving benefits from employment or disability, please bring proof.
- **Failure to appear at your scheduled time will likely result in the court proceeding without you and an FRO being entered against you**.

If You Are the Defendant, It Is Important You Read This Section

If an FRO is entered against you, you should be aware that there are **significant penalties** that will be imposed automatically.

- Your name **will** be kept in a domestic violence central registry. This can affect your employment affect your housing, prevent you from being a resource/foster parent, or affect a professional license.
- You **will** be fingerprinted and fined up to $500.
- You **will** be barred from where the plaintiff lives and works and possibly barred from additional locations and/or additional people (for example, plaintiff's relatives).
- Your parenting time with your child(ren) **might** be affected and you **might** be ordered to participate in court ordered services such as attendance at a batterer's intervention program, submitting to a substance abuse evaluation, or submitting to a psychological/psychiatric evaluation.
- You **will not** be permitted to possess any weapon, ID card, or purchase permit while the FRO is in effect, or for two years, whichever is greater.

Whether you are the plaintiff or defendant, you will have the opportunity to present their case to the court. During the FRO hearing, you will give information (called "*evidence*") to a judge who will decide your case. The judge is the finder of fact; there is no jury in these cases. Evidence that you can present includes information you or someone else tells the judge ("*testimony*") as well as items like email and text messages, documents, photos, and objects ("*exhibits*").

If you do not have an attorney, you will need to collect and present your evidence in the proper way. Courts have rules about evidence so that judges will make decisions based on facts, not gossip and guesswork. The court will allow you to present witnesses, as well as ask questions of the other person and their witnesses (called "*cross-examination*"). Although the rules can be confusing, they are designed to protect your rights, and you can use them to help prepare for your court appearance.

The judge's decision on whether to enter an FRO is based on the information that is provided, so you should come prepared with any evidence you have. Examples of evidence that the judge might accept are:

- your testimony, which should include details regarding the date, location, and specific details of the incident,
- photos of visible injuries and/or property damage,
- copies of police, medical and/or dental reports,
- threatening or harassing letters or text messages,

- threatening messages from answering machines or voicemail,
- financial documents, if seeking financial support, and/or
- witnesses.

Once an FRO is granted, it does not expire. The order remains in effect **forever** unless it is dismissed by the court.

- The plaintiff can request a dismissal in person at the courthouse or by calling the court.
- The defendant can also request a dismissal but would need to file a motion using our packet CN 12420 - How to Ask the Court to Dismiss a Final Restraining Order found on njcourts.gov.

The entry of the FRO is independent of any possible criminal charge that might have also been filed, and this court's issuance of an FRO will not affect those proceedings. However, a violation of the contact provisions of an FRO is a crime for which the defendant could be arrested and charged criminally.

Ways to Find Help with Your Case

Work with a Domestic Violence Advocate

If you are the plaintiff, you can reach out to a domestic violence advocate. A domestic violence advocate is a person who works at your local domestic violence program. Advocates are knowledgeable and can offer specialized domestic violence support and information. They can provide information about services near you, like where to find a lawyer or legal assistance, how to find counseling for you or your children, where to find a shelter or help with housing, and recommend a place that can supervise the defendant's parenting time.

A domestic violence advocate cannot be your lawyer; however, they can go with you to court to provide support. They can also help you prepare for your hearing, including helping you connect remotely to the hearing, and might know about lawyers who are willing to take cases at no charge or low cost (legal aid services).

Even if you have a lawyer, working with a domestic violence advocate can still be helpful. They might know more about domestic violence than your lawyer They can help you make a safety plan. You can find an advocate by asking at the local courthouse or contacting the NJ Coalition to End Domestic Violence njcedv.org.

Use Legal Referral Services

If you cannot afford a lawyer, you may contact the legal services program in your county to see if you qualify for free legal services. Their telephone number can be found online under "Legal Aid" or "Legal Services." If you do not qualify for free legal services and need help in locating an attorney, you can contact the bar association in your county. Most county bar associations have a Lawyer Referral Service.

If you can hire a lawyer, take the time to interview several lawyers before hiring one. Make sure to ask the lawyer about the fee for representing you and what you can expect. Ask any lawyer you interview about their other cases with domestic violence as it is in your best interest to find a lawyer with knowledge about domestic violence.

For an explanation of New Jersey law about domestic violence and suggestions of some of the measures you can take to protect yourself from abuse, including using the Prevention of Domestic Violence Act to get a restraining order to keep the abuser away, visit the Legal Services of New Jersey (LSNJ) website (https://www.lsnjlaw.org/Family-Relationships/Pages/default.aspx#). The title of the guide is "*Domestic Violence - A Guide to the Legal Rights of Domestic Violence Victims in New Jersey*".

Ask at Your Local Courthouse

Court staff *cannot* give you legal advice because they must be neutral and impartial; however, they *can* help you find self-help resources and answer questions about filing papers, setting a hearing or general court procedures. You can find a listing of each county's phone number on the Family Division page listed under *Domestic Violence Resources*/County Phone Numbers for Temporary Restraining Orders.

Additional assistance is available at the courthouse from the ombudsman. In the Judiciary, the ombudsman is a neutral staff person who answers questions, addresses concerns from the public and is responsible for enhancing customer service in the courts. The Ombudsman can also offer referral information to other available resources. They may have contact information about pro bono and legal services organizations. A contact list for the Ombudsmen can be found here: Self-Help Center/Find Local Ombudsman…/Local Ombudsman Contact List

For additional information about domestic violence visit the Family Division page on njcourts.gov.

Call Your Local Library

Public libraries do have a tool for online legal research, and can show people how to use it, so we can say that.

Options After the FRO is Entered

How to File an Appeal

An appeal is a written request asking a higher court to look at the decision of the judge and change that judge's decision. You must make a written request for an appeal **within 45 days** after the judge decided the case and signed an order in the Superior Court. If you want to file an appeal of a court order you can use our kit: CN 10837 - How to Appeal a Trial Court, Tax Court or State Agency Decision, found on njcourts.gov.

How to Change, Modify, or Enforce an FRO

Either **the plaintiff or defendant** can file to change How to Enforce or Request a Change of a Domestic Violence Restraining Order or Sexual Assault Survivor Protection Order. You can submit the completed forms through the Judiciary Electronic Document Submission (JEDS) system, or you can mail them to the courthouse. For information on using JEDS, see the JEDS self-help page.

If you are the plaintiff and the defendant has violated the restraining you should call 911.

My Case is Emergent (Emergent Application Order to Show Cause)

An emergent hearing in the family court is meant to protect children from substantial and permanent harm. You can file for an emergent hearing by filling out the Order to Show Cause for FM, FD and FV Dockets.

New Jersey Domestic Violence Civil Complaint and Temporary Restraining Order

☐ TRO ☑ Amended TRO

N.J.S.A. 2C:25-17 et seq.

☑ Superior Court, Chancery Division, Family Part, ESSEX County ☐ Municipal Court of

Docket Number	Police Case Number
FV-07-000817-22	C21039526

In the Matter of Plaintiff (Victim)	Plaintiff's Sex	Plaintiff's Date of Birth
KING JOHN C	☑ Male ☐ Female	04/17/1986

Defendant Information

Last Name	First Name	Initial	Defendant's Sex	Race
COLSTON	CHARMAINE		☐ Male ☑ Female	UNKNOWN

AKA	Defendant's Social Security Number	Date of Birth	Height	Weight
COLSTON CHARMAINE Y		11/30/1989	5 07	165

Home Address	City	State	Zip	Eye Color	Hair Color
4419 LAKE FAIRWAY DR , UNABLE TO FORWARD	LAKE CHARLES	LA	70601	BROWN	BLACK

Home Phone Number	Work Phone Number	Distinguishing Features (Scars, Facial Hair, Etc.)

Employer	Driver's License Number

Work Address	State	Driver's License Expiration Date

The undersigned complains that said defendant did endanger plaintiff's life, health or well being (give specific facts regarding acts or threats of abuse and the date(s) and time(s) they occurred; specify any weapons):

ON (Date)	AT (Time)	BY (Details; specify any weapons)
09/08/2021	09:20 PM	ON SEPTEMBER 8, 2021, JOHN CLIFFORD JOSEPH KING SR ENTERED THE THIRD POLICE PRECINCT TO FILE A DOMESTIC REPORT. MR. KING SR STATED HE HAS BEEN RECEIVING NUMEROUS HARASSING PHONE CALLS. EMAILS AND TEXT MESSAGES FROM HIS CHILDREN MOTHER, CHARMINE COLSTON IN VIOLATING OF A TEMPORARY RESTRAINING ORDER GRANTED TO MR.KING SR FROM THE PARISH OF CALSASIEU IN THE STATE OF LOUISIANA ON AUGUST 19, 2021 FROM JUDGE W. MITCHELL REDD. MR. KING SR STATED SINCE AUGUST 24, 2021 TO THE PRESENT, HE WAS RECEIVED NUMEROUS PHONE CALLS, TEXT AND EMAILS FROM MISS. COLSTON WHICH THREATENS MR. KING SR GIRLFRIEND'S SAFELY, THREATENING MR. KING SR. LIFE AND HIS RELATIONSHIP WITH THE CHILDREN SHARED BETWEEN THEM, AND AS WELL AS PRETENDING TO BE THE CHILDREN THAT ARE SHARED BY MR. KING SR AND MISS. COLSTON IN AN ATTEMPT BY MISS.COLSTON TO GET MR. KING SR TO CONTACT HER. MR.KING SR WAS ADVISED OF HIS DOMESTIC VIOLENCE VICTIMS RIGHTS WHICH INCLUDED THE AVAILABILITY OF OBTAINING A TEMPORARY RESTRAINING ORDER AND THE SERVICES OF A D.V.R.T. MEMBER. MR. KING SR ACCEPTED POLICE ASSISTANCE ON OBTAINING A TEMPORARY RESTRAINING ORDER. THE THIRD PRECINCT RECEIVED FROM MR. KING SR COPIES OF THE TRO FROM THE PARISH OF CALCASIEU TRO UNDER CASE NUMBER : 2021-002773, TEST MESSAGES, EMAILS AND CALL LOGS OF MISS. COLSTON NUMEROUS ATTEMPTS IN CONTACTING HIM. ALL WERE SUBMITTED. BWC RECORDED.

which constitute(s) the following criminal offenses(s): (Check all applicable boxes. Law Enforcement Officer: Attach *N.J.S.P.* UCR DV1 offense report(s)):

☐ Homicide	☐ Terroristic Threats	☐ Criminal Restraint	☐ Sexual Assault	☐ Lewdness	☐ Burglary	☑ Harassment
☐ Assault	☐ Kidnapping	☐ False Imprisonment	☐ Criminal Sexual Contact	☐ Criminal Mischief	☐ Criminal Trespass	☐ Stalking
☐ Criminal Coercion	☐ Robbery	☑ Contempt of a DV Order	☐ Any Other Crime Involving Risk of Death or Serious Bodily Injury			☐ Cyber Harassment

1. Any prior history of domestic violence reported or unreported? If Yes, explain: ☐ Yes ☑ No

2. Does Defendant have a criminal history? (If Yes, submit any available criminal history report) ☐ Yes ☑ No

3. Any prior or pending court proceedings involving parties? (If Yes, enter docket number, court, county, state) ☑ Yes ☐ No
   CASE NUMBER 2021-002773, 14TH JUDICIAL COURT, LA

4. Has a criminal complaint been filed in this matter? (If Yes, enter date, docket number, court, county, state) ☑ Yes ☐ No
   CASE NUMBER 2021-002773, 14TH JUDICIAL COURT, LA

5. If Law Enforcement Officers responded to a domestic violence call:
   Were weapons seized? If Yes, describe: ☐ Yes ☑ No Was Defendant arrested? If Yes, describe: ☐ Yes ☑ No

6. (A) The Plaintiff and Defendant are 18 years old or older or emancipated and are: (select one)
   ☐ Married / Civil Union ☐ Divorced ☐ Present Household Member ☐ Was at Any Time a Household Member **OR**
   (B) The Defendant is 18 years old or older or emancipated and Plaintiff and Defendant are: (select one)
   ☐ Unmarried ☑ Co-Parents ☐ Expectant Parents ☐ Plaintiff and Defendant have had a dating relationship

7. Where appropriate list children you have with the Defendant, if any (include name, sex, date of birth, person with whom child resides)

Child's Name: Last	First	M.I.	Sex	Birth Date	Resides

Docket Number	Defendant's Name
FV-07-000817-22	**CHARMAINE COLSTON**

8. The Plaintiff and Defendant: ☐ Presently; ☑ Previously; ☐ Never: Resided Together
☐ Family Relationship: What is your relationship to the defendant? _____ (Specify)

Certification

I certify that the foregoing responses made by me are true. I am aware that if any of the foregoing responses made by me are willfully false, I am subject to punishment.

06/08/2022
Date

JOHN C KING
Signature of Plaintiff

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	CHARMAINE COLSTON

Part 1 - RELIEF - Instructions: Relief sought by Plaintiff

DEFENDANT:

	TRO	FRO	TRO Granted	
1.	☑	N/A	☑	You are prohibited from returning to the scene of violence.
2.	☑	☑	☑	You are prohibited from future acts of domestic violence.
3.	☑	☑	☑	You are barred from the following locations: ☑ Residence(s) of Plaintiff ☑ Place(s) of employment of Plaintiff
				☑ Other (Only list addresses known to Defendant): 123 NORTH LOUISIANA AVE, LAKE CHARLES, LA
4.	☑	☑	☑	You are prohibited from having **any** oral, written, personal, electronic, or other form of contact or communication with Plaintiff.
	☐	☐	☐	Other(s):
5.	☑	☑	☑	You are prohibited from making or causing anyone else to make harassing communications to: Plaintiff
	☐	☐	☐	Other(s) - Same as item 4 above or list names:
6.	☑	☑	☑	You are prohibited from stalking, following or threatening to harm, stalk or follow: Plaintiff
	☐	☐	☐	Other(s) - Same as item 4 above or list names:
7.	☐	☐		You must pay emergent monetary relief to (describe amount and method):
	☐	☐	☐	Plaintiff:
	☐	☐	☐	Dependent(s):
8.	☐	☐	☐	You must be subject to intake monitoring of conditions and restraints:
	☐	☐	☐	Other (evaluations or treatment - describe):
9.	☐	☐	☐	Psychiatric evaluation:
10.	☑	☑	☑	**Prohibition Against Possession of Weapons:** You are prohibited from possessing **any and all firearms or other weapons** and must immediately surrender these firearms, weapons, permit(s) to carry, application(s) to purchase firearms and firearms purchaser ID card to the officer serving this Court Order. Failure to do so may result in your arrest and incarceration.

PLAINTIFF:

11.	☐	☐	☐	You are granted exclusive possession of (list residence or alternate housing only if specifically known to defendant):
12.	☐	☐	☐	You are granted temporary custody of:
13.	☐	☐	☐	Other relief for - Plaintiff:
	☐	☐	☐	Other relief for - Children:

LAW ENFORCEMENT OFFICER:

You are to accompany to scene, residence, shared place of business, other (indicate address, time, duration and purpose):

☑	☑	☑	Plaintiff: ACCOMPANY PLAINTIFF TO HIS RESIDENCE
☐	☐	☐	Defendant:

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	CHARMAINE COLSTON

Warrant to Search for and to Seize Weapons for Safekeeping

☑ **To any law enforcement officer having jurisdiction -** this Order shall serve as a warrant to search for and to seize any issued permit to carry a firearm, application to purchase a firearm and firearms purchaser identification card issued to the defendant and the following firearm(s) or other weapon(s).Describe the weapons to be seized:
38 PISTOL

1. **You are hereby commanded** to search for the above described weapons and/or permits to carry a firearm, application to purchase a firearm and firearms purchaser identification card and to serve a copy of this Order upon the person at the premises or location described as:
1225 COUNTRY CLUD RD UNIT 5107, LAKE CHARLES, LA

2. **You are hereby ordered** in the event you seize any of the above described weapons, to give a receipt for the property so seized to the person from whom they were taken or in whose possession they were found, or in the absence of such person to have a copy of this Order together with such receipt in or upon the said structure from which the property was taken.

3. **You are authorized** to execute this Order immediately or as soon thereafter as is practicable:

☐ Anytime ☑ Other: IMMEDIATELY

4. **You are further ordered,** after the execution of this Order, to promptly provide the Court with a written inventory of the property seized per this Order.

Part 2 - RELIEF - DEFENDANT:

	TRO	FRO	TRO Granted	
1.	☐	☐	☐	No parenting time / visitation until further ordered;
	☐	☐	☐	Parenting time / visitation pursuant to _____ suspended until further order: _____
	☐	☐	☐	Parenting time / visitation permitted as follows:
2.	☐	☐	☐	Risk assessment ordered (specify by whom, any requirements, dates):
3.	☐	☐		You must provide compensation as follows:
	☐	☐	☐	Emergent support for Plaintiff: _____
	☐	☐	☐	for Dependent(s): _____
	N/A	☐	☐	Ongoing support for Plaintiff: _____
	N/A	☐	☐	for Dependent(s): _____
	☐	☐	☐	Compensatory damages to Plaintiff: _____
	N/A	☐	☐	Punitive damages to Plaintiff: _____
	N/A	☐	☐	to Third Party(ies) (describe): _____
	☐	☐	☐	Medical coverage for Plaintiff: _____
	☐	☐	☐	for Dependent(s): _____
	☐	☐	☐	☐ Rent ☐ Mortgage payments (specify amount(s) and recipient(s)):
	☐	☐	☐	You must participate in a batterers intervention program:
	☐	☐	☐	You are granted temporary possession of the following personal property (describe):

Part 2 - RELIEF - PLAINTIFF:

☐ ☐ ☐ You are granted temporary possession of the following personal property (describe):

Comments:

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	**CHARMAINE COLSTON**

Addendum:

☐ **TRO denied.** Complaint dismissed by Family Part.

☐ **TRO denied by Municipal Court.**

☐ **TRO denied** by Superior Court Judge at De Novo Hearing.

☐ **TRO granted** by Superior Court Judge at De Novo Hearing. The Court has established jurisdiction over the subject matter and the parties pursuant to *N.J.S.A.* 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to *R.* 5:7A(b) and *N.J.S.A.* 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.

☑ **TRO granted.** The Court has established jurisdiction over the subject matter and the parties pursuant to *N.J.S.A.* 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to *R.* 5:7A(b) and *N.J.S.A.* 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.

Date/Time ☐ Via Telecommunications	s/ Hearing Officer	
Date/Time ☐ Via Telecommunications	s/ Honorable Municipal Court Judge	Court / County
06/08/2022 09:58 AM Date/Time ☐ Via Telecommunications	s/ JOANNE COCCHIOLA Honorable Superior Court Judge	ESSEX Court / County

All Law Enforcement Officers Will Serve and Fully Enforce This Order

This *ex parte* Domestic Violence Complaint and Temporary Restraining Order meets the criteria of the federal Violence Against Women Act for enforcement outside of the State of New Jersey upon verification of service of defendant. 18 *U.S.C.A.* 2265 & 2266

This Order Shall Remain in Effect Until Further Order of the Court and Service of Said Order on the Defendant.

Notice to Appear to Plaintiff and Defendant

1. ☐ Both the plaintiff and defendant are ordered to appear for a final hearing on (date) _____ at (time) _____ at the Superior Court, Chancery Division, Family Part, _____ County, located at (address)

Note: You must bring financial information including pay stubs, insurance information, bills and mortgage receipts with you to Court.

2. ☑ Remote: All parties shall appear for a hearing on 08/01/2022 at 08:30 AM
   - I. ☐ Video Remote Hearing is scheduled at the above date and time. You must attend via video as scheduled. Please contact the court for further details at _____
   - II. ☐ Phone Remote Hearing is scheduled at the above date and time. You must attend via Phone as scheduled. Please contact the court for further details at _____
   - III. ☑ Remote Hearing is scheduled at the above date and time. You must attend as scheduled. Please contact the court for further details at 973-776-9300 X57210
   - IV. ☐ The proceeding will be conducted on the papers. Please contact the court for details _____
3. ☐ The final hearing in this matter shall not be scheduled until: _____
4. ☐ Interpreter needed. Language: _____

Upon satisfaction of the above-noted conditions notify the Court immediately so that a final hearing date may be set.

IMPORTANT: The parties cannot themselves change the terms of this Order on their own. This Order may only be changed or dismissed by the Superior Court. The named defendant cannot have any contact with the plaintiff without permission of the Court.

Notice to Defendant

A violation of any of the provisions listed in this Order or a failure to comply with the directive to surrender all weapons, firearm permits, applications or identification cards may constitute criminal contempt pursuant to *N.J.S.A.* 2C:29-9(b), and may also constitute violations of other state and federal laws which may result in your arrest and/or criminal prosecution. This may result in a jail sentence.

You have the right to immediately file an appeal of this temporary Order before the Superior Court, Chancery Division, Family Part, as indicated above and a hearing may be scheduled.

Docket Number	**Defendant's Name**
FV-07-000817-22	**CHARMAINE COLSTON**

Return of Service

☑ Plaintiff was given a copy of the Complaint / TRO by:

SERVED IN COURT JENKINS T	09:58 AM 06/08/2022	ESSEX COUNTY SUPERIOR COURT
Print Name	Time and Date	Signature / Badge Number / Department

☑ I hereby certify that I served the within Complaint / TRO by delivering a copy to the Defendant personally:

SERVED IN COURT JENKINS T	09:59 AM 06/08/2022	ESSEX COUNTY SUPERIOR COURT
Print Name	Time and Date	Signature / Badge Number / Department

☐ I hereby certify that I served the within Complaint / TRO by use of substituted service as follows:

Print Name	Time and Date	Signature / Badge Number / Department

☐ Defendant could not be served (explain): _____

Print Name	Time and Date	Signature / Badge Number / Department

The Courthouse is accessible to those with disabilities. Please notify the Court if you require assistance.

Distribution: Family Part, Plaintiff, Defendant, Sheriff, Other _____

08/14/2023
John King
Vs.
Charmaine Colston
Case # 23-1206
Lake Charles City Court
Ward Three
Calcasieu Parish
State of Louisiana

Motion to Quash

Dear Honorable Judge Lake Charles City Court, Civil Division Lake Charles Louisiana. A terrible injustice has occurred wherein my property was taken via title fraud and forgery by force from my ex girlfriend while under two restraining orders. As you can see her attorney Derrick Kee filed for exceptions however there are several problems with his motion including but not limited to …

A) Conflict of Interest- You will find in testimony the Mr. Kee served on the very bench that at one point handled my case and the ADA's that worked under him. He himself specifically was contacted with a complaint regarding my stolen car for which he responded offering proposed resolution. A Calcasieu Parish judge should not ethically in good moral conscience be able to represent a case that involves a former parish employee who benefited financially from her position at the city controller's office for which she was fired for the very mishandling and unethical behavior which predated the illegal transfer of my car title by forgery. You will find with evidence and witness testimony that Charmaine Y Colston is in fact a professional scammer and has in the last 4 years conducted a number of scams yielding her over $100k per year in inflows from money and government handouts. For what unknown reason would Mr. Kee benefit by representing this case pro bono when the evidence is contrary to his written claims in his motion? Mr. Kee was dishonest in his motion at no time in the case investigation provided for review does it ever say that anything was gifted to her or that she "beat a case". Contrary to that it is obvious that the transfer involves a "Bill of Sale" BKA a Promissory Note also known as a debt instrument for which the amount she claims remains outstanding.. In the state of Louisiana the Statute of Limitations on this sort of transaction is five years and not 1 year. La . Stat. tit. 10.

3-419 " Actions on negotiable instruments, and on promissory notes whether negotiable or not are subject to a liberal prescriptive of five years. This prescription commences to run from the day payment is eligible" As you can see from the results of the investigations attached this is one of many reasons why this case was filed timely.

B) "Discovery"- The begins from the point of reasonable discovery and as you can see from emails dated August 2022 between the District Attorney office and Calcasieu Parish Sheriff Dept as of August 2022 they claimed it was still an open investigation and could not verify the results of the investigation which would be necessary to determine who the owner of the vehicle actually was. Carfax does not display who the owner is nor does the Lake Charles City Police Department release the name of the owners. In order for me to know that Renee Amos (the unethical notary involved) who conspired with Charmaine Colston to pretend as if I were in the State of Louisiana at the time to steal the title of my car. This is an undeniable act of forgery that could only be determined by the Louisiana Department of Motor Vehicles releasing who the title was registered under. I left during a state of emergency of a hurricane and had to work up north to earn a living. Left my vehicle behind which Charmaine Colston sold her brand new Honda Civic immediately prior to evacuation and I was told that she had not had time to secure another vehicle. I intended to leave the car with my mother post hurricane for which I still have the keys. If I had "given" as Mr Kee alleges wouldn't I have also given all of the keys? The Discovery of who the car was titled to was handed over to the Calcasieu Parish DA office and was not made available to me.

C) Mr Kee made many dishonest assertions, one of which is that she "beat" the case? How so when the evidence shows she refused to ever even give a statement and admitted to the forgery. Her defense is that I told her she could forge my name? Charmaine Colston did not cooperate with the investigation other than to harass ADA Ross Murray seen in multiple forms of evidence which I have provided a warrant for her arrest was issued in regards to the detectives investigation as forgery was admitted and proven. However there are no exceptions allowed by law which would allow any Louisiana resident to stand in front of a notary which required me to appear in person with two forms of identification. Noone can have "permission" to forge a notarized document. This is the one sticking point that cannot be ignored: Charmaine Colston forged my name twice while under a restraining order. Both in September 2021 and October 2021 she did this purposefully as the registration was in no danger of expiring and I was required to carry insurance coverage on the car for many months past the month of October 2021. My flight evidence also reveals that my flight was to land within 72 hours of the forged transfer. Why would she need to forge the document ? The emails themselves show where on multiple occasions she threatened me telling me to come and get my vehicle and that she did not want it. Why would a married man tell his ex girlfriend that she could forge his signature while under restraining order?

D) Please reference correspondence where my attorney and Charmaine Colston attorney agreed that Charmaine would return my vehicle to the home of Cynthia Smith prior to my arrival so that I would have a means of transportation on October 8, 2021.
E) Lastly the Joint Torts exception invalidates Mr Kees claims for prescription as I have filed suit against Renee Amos and charges against Renee Amos were brought by the Louisiana Secretary of State Notary Division. Colston and Amos share joint liability in the illegal transfer of my title by both willingly and illegally conspiring to steal the title for which Renee Amos was complacent and participated. Joint Torts statute of limitations would also exist for longer than a one year period in Louisiana.

I ask that you humbly soo this case for what it is. It was an intentional vindictive act of financial abuse perpetrated by a bitter ex girlfriend in retaliation to my marital status. What other explanation could there be? I am entitled to compensation of the payoff amount and I have declared bankruptcy and cannot obtain another vehicle.

Additional exceptions include

One of which was for stalking. Additionally I had no access to an open investigation for case number 2021-00123665 until the detective released it November 2023 confirming without a doubt that the suspect Charmaine Y Colston had committed title fraud by

1. Fraudulently appearing in front of a notary whom was a friend while I was not in the state

on 09/07/2021 and intentionally and knowingly while under a restraining order forged my signature onto a notarized document of notary Renee Amos. I was 2000 miles away on this day and there is no way I could have been in the state of Louisiana and this is confirmed by Charmaine Colston herself and a thorough investigation by the Calcasieu Parish Sheriff Department and Lake Charles Police Department. Evidence attached shows Charmaine Colston fraudulently and intentionally stealing my car title even though she was under a restraining order. These exceptions for stalking, restraining order and period of discovery as shown within the investigation shows I am well within the statute of limitations. As the defendant's attorney herself made a motion saying I must "prove" through evidence that she stole the car. This evidence

was released to me November 2022 and I proceeded to seek the proper remedy.

2. Charmaine Colston abused her position as a former employee with the city of Sulphur LA

where her previous role was the transfer of auto titles for the city. Witness testimony will confirm that Charmaine Colston maliciously and intentionally engaged in scams to obtain my assets illegally. She was trained in how to do so and if you refer to the investigation conducted by Detective Castille You will see without a donut on camera that I was not there when she stole the title to my car and transferred the joint assets of myself and my spouse. The Chevrolet Traverse was obtained by title fraud. The results of the investigation confirm this and she not only has scammed me but also filed a fake racial discrimination lawsuit against the City of Sulphur when she was fired for disorderly conduct. She used the race card to file suit and obtain a $55k settlement from the City of Sulphur Louisiana, Colston has also engaged in FEMA fraud, forged life insurance and securities fraud of which the stolen policies had to be reissued back to me with a formal apology. Colston forges multiple documents pretending to be my spouse and although my ex girlfriend we have never been

married or represented ourselves as married. I have over 35 pages of evidence from independent investigations that prove that Charmaine intentionally got the title notarized when I was not present by fraud. She also claims to have paid me "$100" for the car of which I have never received payment and it would have been impossible as Colston was under a restraining order in two different states at the time.

I intend to interview two witnesses in court on Wednesday August 16, 2023 and will insist that Mr. Derrick Kee, a former Calcasieu Parish Judge who stands to gain financially from representation of fraudulent acts and investigations that involve lawsuits against the Parish for financial gain as evidence of a series of scams and financial abuses.

Thank You
John C. King Sr.

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

May 28, 2025

TO: Oliver "Jackson" Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Email: oschrumpf@schrumpf-law.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5,397.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)

Please remit payment for the amount listed above.

If you have any questions about the named suit above, please call the Accounting Section of Lake Charles City Court at (337) 491-8701, or Civil office at (337)491-1564.

Monica Abshire
Clerk of Court
mabshire@lccitycourt.org

Affidavit of Transmission

Attention: John C. King email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: December 12, 2024

Docket No. 23-2124 John C King, Sr vs. Renee Amos – 7 pages received – Emergency Motion to Recuse/Remove Honorable Judge Ron Richard; Motion to Vacate Retaliatory Judgments; Motion to Strike & Seal Identifying information from Public Record; Motion to Intervene to prevent further Judicial Harassment & Loss of Life; Order

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

LAKE CHARLES CITY COURT

118 West Mill Street
Lake Charles, LA 70601

STATEMENT

December 23, 2024

John Clifford J King
vs. 23-2124
Renee Amos Notary Public Notary ID# 29374

Transcript of testimony of trial on November 14, 2024
Judge Ronald C. Richard

117 pages $ 555.75

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601
  kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant’s Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis

I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant's **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), "excited utterance"**, and **La. C.E. Art. 803(3), "then-existing mental, emotional, or physical condition"**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses' statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant's claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Case # 23-2124
King Vs Amos The Hartford

Motions Continuance DismissQuash
10/31/2024

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the 31st day of October, 2024, at 6:58 o'clock AM/PM, Lake Charles, Louisiana.

5/31/24

signature

STATE OF LOUISIANA

Case # 23-2124 Motions Continuance DismissQuash
King Vs Amos The Hartford 10/31/2024

PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared **John CJ King Sr.**, who, after being duly sworn, did depose and say:

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical



_____

COST DISCREPANCY ANALYSIS
Lake Charles City Court

Category	**Case No. 23-2124** **King v. Amos**	**Case No. 23-1206** **King v. Colston**
Early 2024 Baseline Costs	February 23, 2024 certified copy request: $29.00 [1]	Routine filing and service fees only; no comparable escalation
November 14 and December 30, 2024 Activity	Approximately $5,000.00 imposed December 30, 2024 [2] $800.00 transcript charge [3]	No comparable single day cost spike
Service and Address Entries	Service fees entered at Iowa, Louisiana address under 'Shunte King' [4]	Standard service entries; no address irregularity reflected

Footnotes:

[1] February 23, 2024 entry: Request for certified copies, total cost $29.00.

[2] Cost ledger reflects approximately $5,000.00 assessed December 30, 2024 in Case No. 23-2124.

[3] Transcript preparation fee of $800.00 reflected in cost bill.

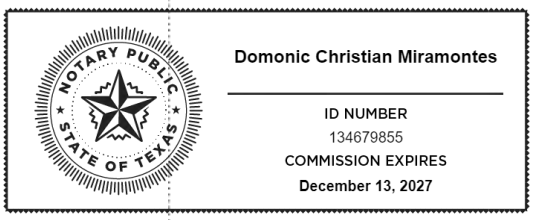
[4] Service entries reflect Iowa, Louisiana address not associated with domicile, raising equity concerns under La. C.C.P. art. 1920.

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 10/31/2024

Number of Pages (including notarial certificate): 7



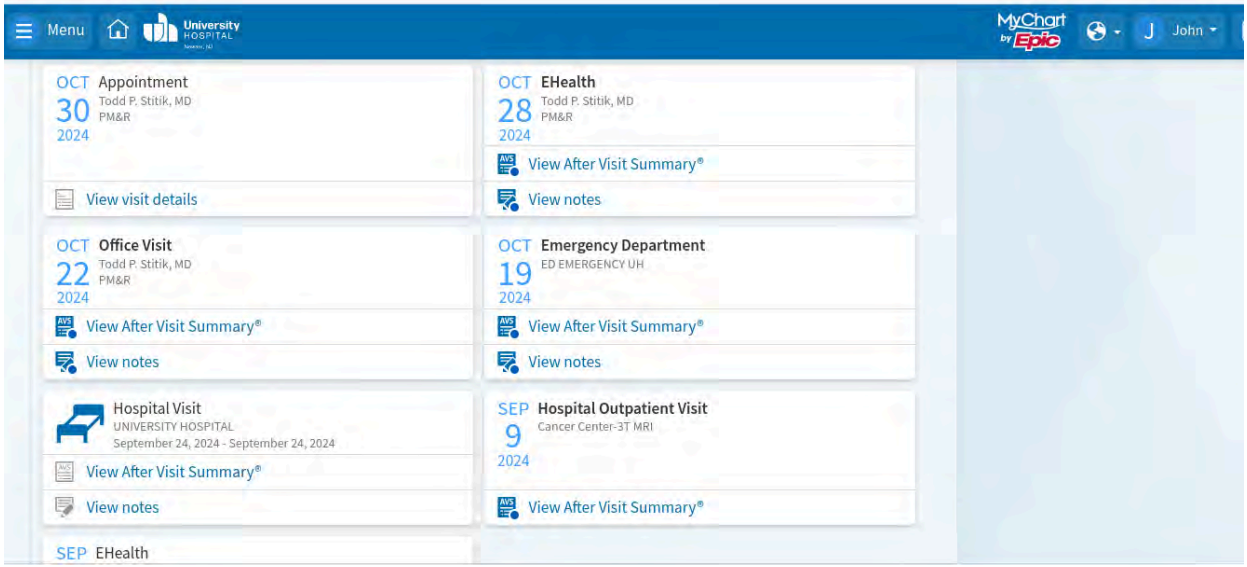
State of Texas

County of Bexar

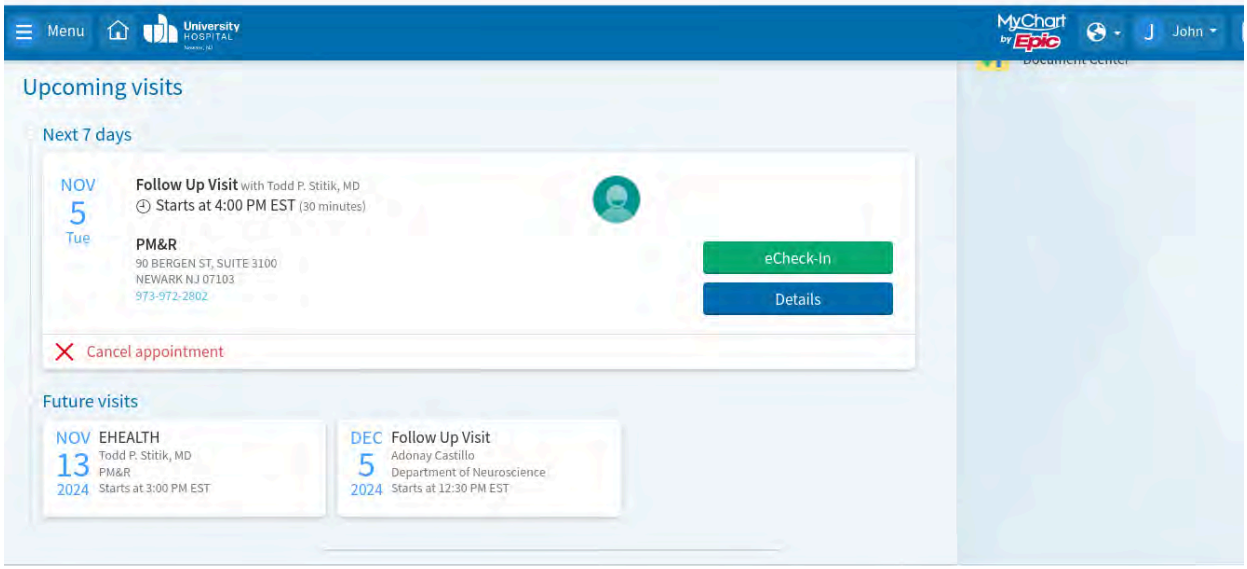
This instrument was acknowledged before me by means of an interactive two-way audio and video communication on 10/31/2024 by John Clifford King.

Case #23-2124 King VsAmos
11/04/2024
Confidential Medical Record from
Cancer center, Ambulance, Emergency Room, Hospital Admittance
Discharged on rolling walker to Muscular Skeletal and Neuro for seizures

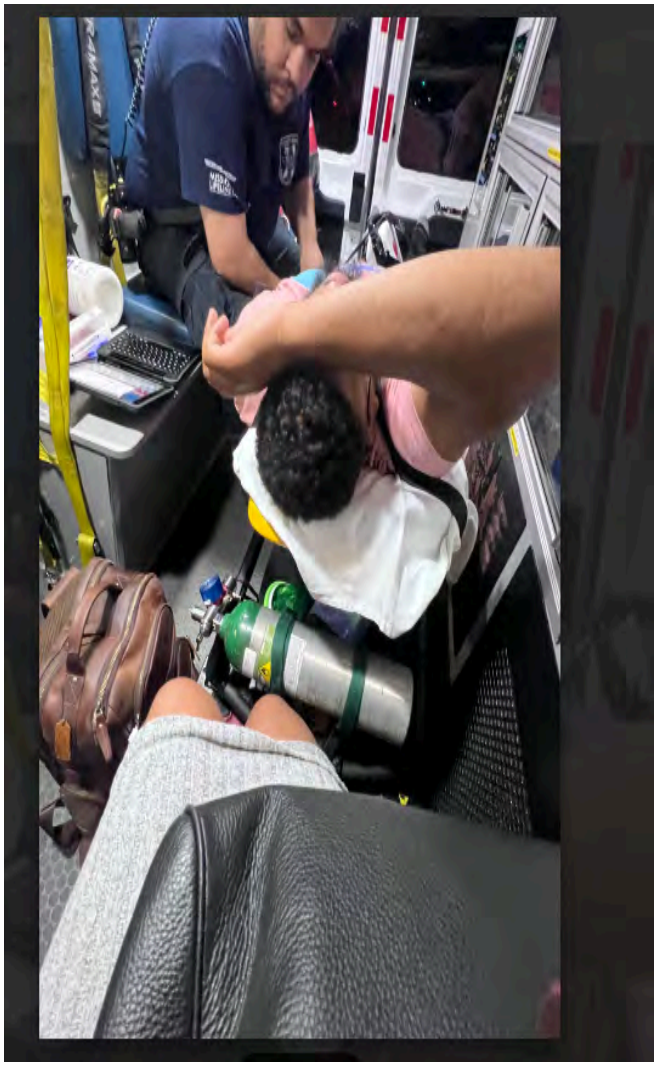
King Medical Records
September 9. 2024 - Cancer center outpatient
Oct 19, 2024 - taken to hospital by ambulance seizures - admitted temporary paralysis spinal tear
Oct 24, 2024 discharged to Muscular Skeletal and Neurology
Oct 28, 2024 - Muscular Skeletal
Oct 30, 2024 - Muscular Skeletal

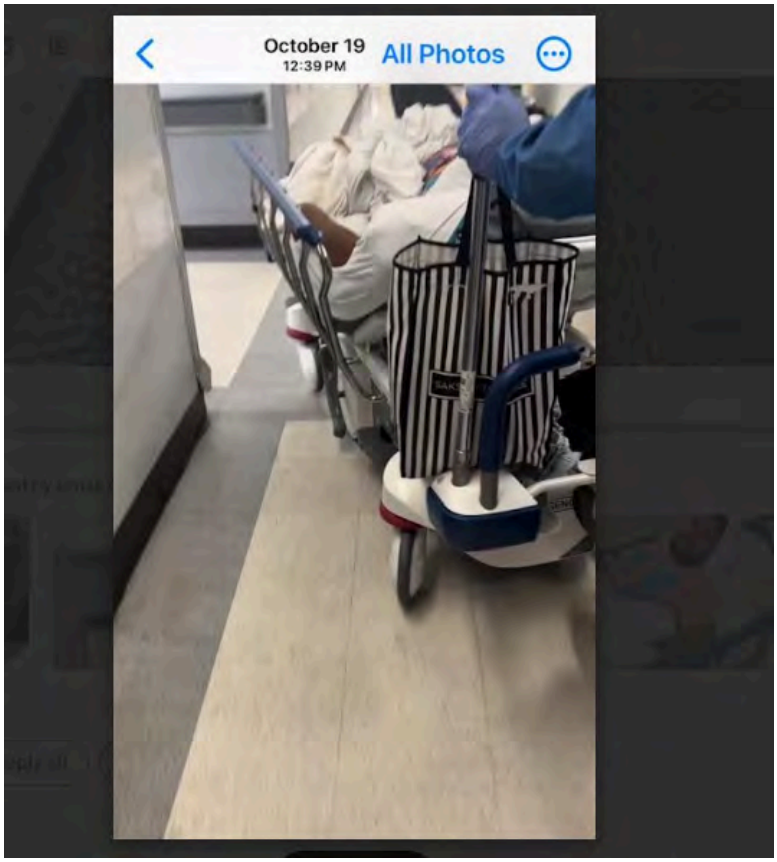


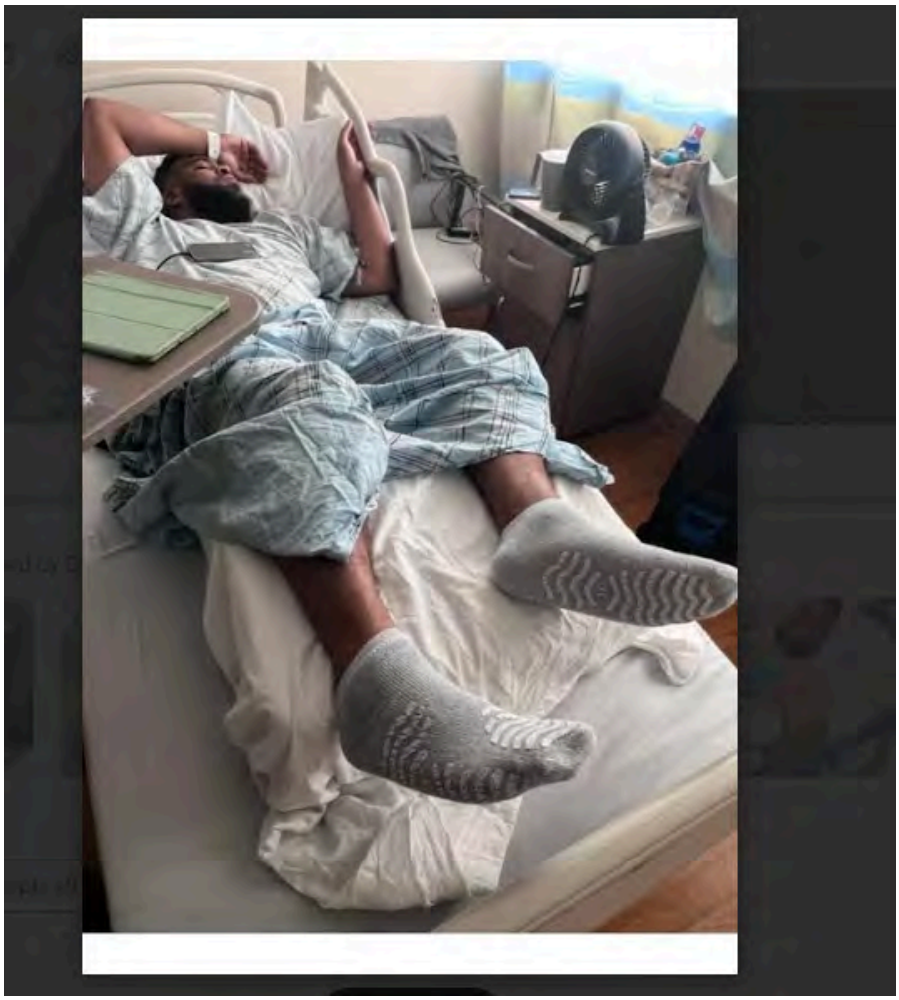
King Upcoming Nuerology and Muscular Skeletal
November 5, 2024 - Muscular Skeletal - review spinal cord swelling
November 13, 2023 - outpatient epidural to stabilize spinal tear
December 5, 2024 - Results of from neurosurgeon from outpatient treatment at cancer center and physical therapy


Menu
University HOSPITAL
MyChart by Epic
John
Upcoming visits
Next 7 days
NOV
5
Tue
Follow Up Visit with Todd P. Stitik, MD
Starts at 4:00 PM EST (30 minutes)
PM&R
90 BERGEN ST, SUITE 3100
NEWARK NJ 07103
973-972-2802
eCheck-In
Details
Cancel appointment
Future visits
NOV
13
2024
EHEALTH
Todd P. Stitik, MD
PM&R
Starts at 3:00 PM EST
DEC
5
2024
Follow Up Visit
Adonay Castillo
Department of Neuroscience
Starts at 12:30 PM EST

Photos

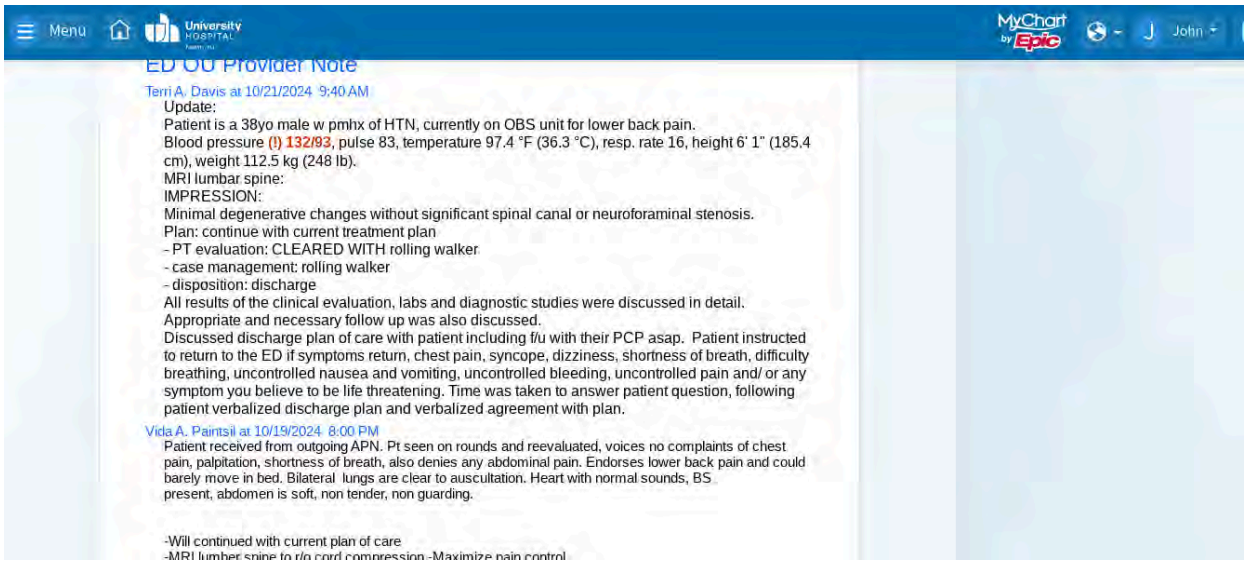



October 19
12:39 PM
All Photos





Discharged on Rolling Walker, Compressed Spine History of Seizures



Menu University Hospital MyChart by Epic John

ED OU Provider Note

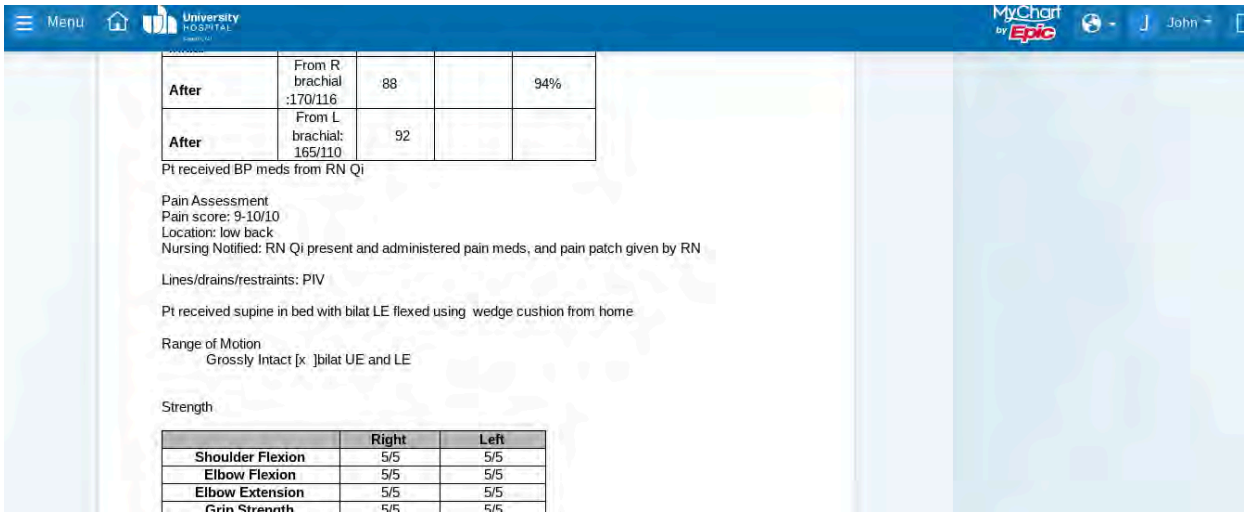
Terri A. Davis at 10/21/2024 9:40 AM

Update:
Patient is a 38yo male w pmhx of HTN, currently on OBS unit for lower back pain.
Blood pressure (!) 132/93, pulse 83, temperature 97.4 °F (36.3 °C), resp. rate 16, height 6' 1" (185.4 cm), weight 112.5 kg (248 lb).
MRI lumbar spine:
IMPRESSION:
Minimal degenerative changes without significant spinal canal or neuroforaminal stenosis.
Plan: continue with current treatment plan
- PT evaluation: CLEARED WITH rolling walker
- case management: rolling walker
- disposition: discharge
All results of the clinical evaluation, labs and diagnostic studies were discussed in detail.
Appropriate and necessary follow up was also discussed.
Discussed discharge plan of care with patient including f/u with their PCP asap. Patient instructed to return to the ED if symptoms return, chest pain, syncope, dizziness, shortness of breath, difficulty breathing, uncontrolled nausea and vomiting, uncontrolled bleeding, uncontrolled pain and/ or any symptom you believe to be life threatening. Time was taken to answer patient question, following patient verbalized discharge plan and verbalized agreement with plan.

Vida A. Paintsil at 10/19/2024 8:00 PM

Patient received from outgoing APN. Pt seen on rounds and reevaluated, voices no complaints of chest pain, palpitation, shortness of breath, also denies any abdominal pain. Endorses lower back pain and could barely move in bed. Bilateral lungs are clear to auscultation. Heart with normal sounds, BS present, abdomen is soft, non tender, non guarding.

-Will continued with current plan of care
-MRI lumber spine to r/o cord compression -Maximize pain control



After	From R brachial :170/116	88		94%
After	From L brachial: 165/110	92		

Pt received BP meds from RN Qi

Pain Assessment
Pain score: 9-10/10
Location: low back
Nursing Notified: RN Qi present and administered pain meds, and pain patch given by RN

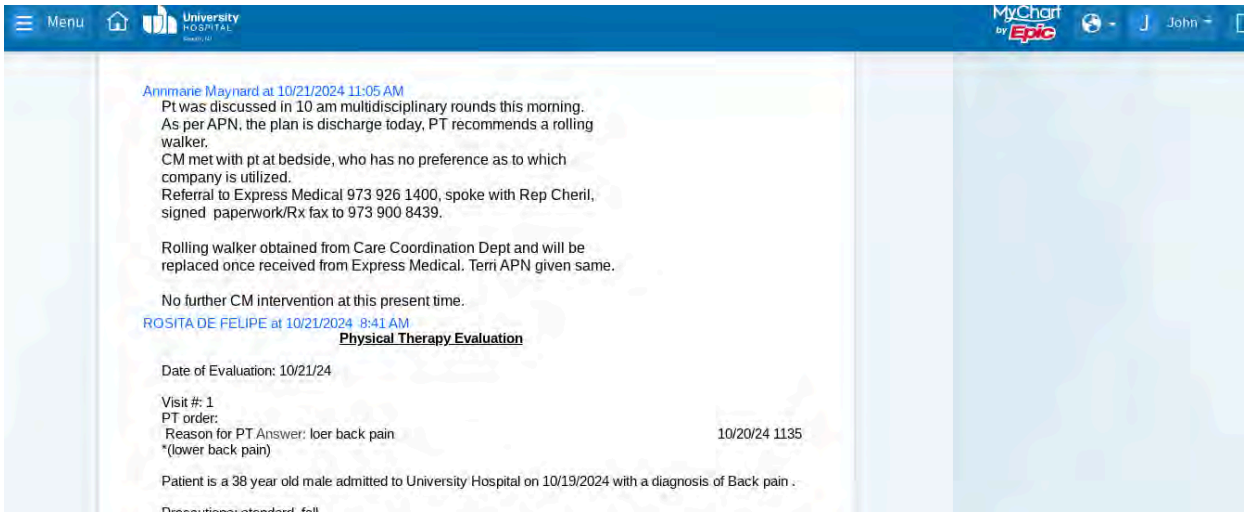
Lines/drains/restraints: PIV

Pt received supine in bed with bilat LE flexed using wedge cushion from home

Range of Motion
Grossly Intact [x]bilat UE and LE

Strength

	Right	Left
Shoulder Flexion	5/5	5/5
Elbow Flexion	5/5	5/5
Elbow Extension	5/5	5/5
Grip Strength	5/5	5/5



Annmarie Maynard at 10/21/2024 11:05 AM

Pt was discussed in 10 am multidisciplinary rounds this morning.
As per APN, the plan is discharge today, PT recommends a rolling walker.
CM met with pt at bedside, who has no preference as to which company is utilized.
Referral to Express Medical 973 926 1400, spoke with Rep Cheril, signed paperwork/Rx fax to 973 900 8439.

Rolling walker obtained from Care Coordination Dept and will be replaced once received from Express Medical. Terri APN given same.

No further CM intervention at this present time.

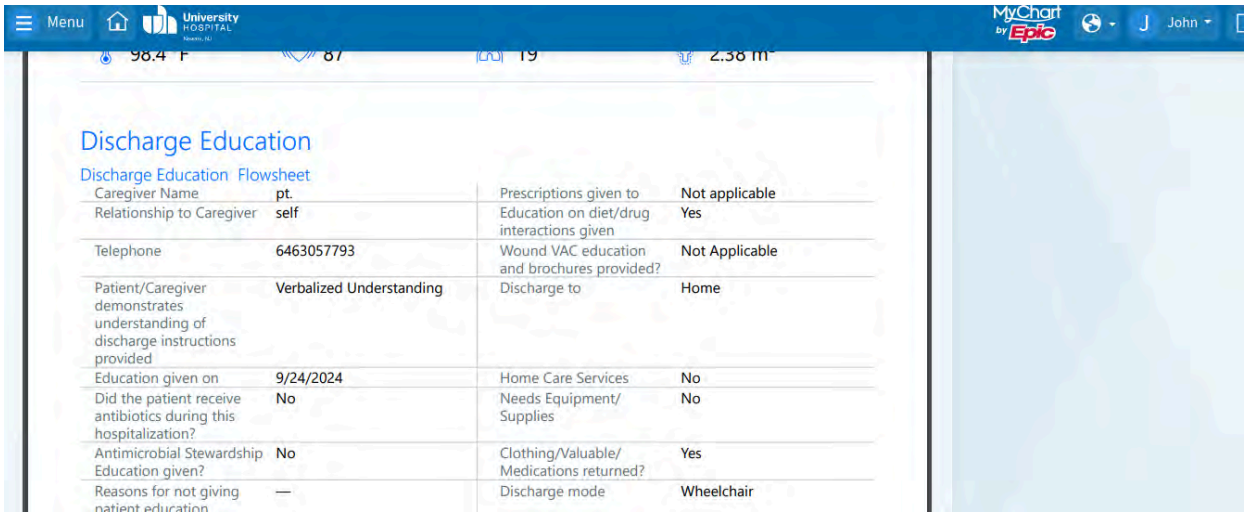
ROSITA DE FELIPE at 10/21/2024 8:41 AM

Physical Therapy Evaluation

Date of Evaluation: 10/21/24

Visit #: 1
PT order:
Reason for PT Answer: loer back pain 10/20/24 1135
*(lower back pain)

Patient is a 38 year old male admitted to University Hospital on 10/19/2024 with a diagnosis of Back pain .



98.4 °F 87 19 2.38 m²

Discharge Education

Discharge Education Flowsheet

Caregiver Name	pt.	Prescriptions given to	Not applicable
Relationship to Caregiver	self	Education on diet/drug interactions given	Yes
Telephone	6463057793	Wound VAC education and brochures provided?	Not Applicable
Patient/Caregiver demonstrates understanding of discharge instructions provided	Verbalized Understanding	Discharge to	Home
Education given on	9/24/2024	Home Care Services	No
Did the patient receive antibiotics during this hospitalization?	No	Needs Equipment/ Supplies	No
Antimicrobial Stewardship Education given?	No	Clothing/Valuable/ Medications returned?	Yes
Reasons for not giving patient education	—	Discharge mode	Wheelchair


The Judiciary Commission of Louisiana
Office of Special Counsel
Mrs. Nicole Jones King
123 N. Louisiana Ave.
Lake Charles, LA 70601


The Judiciary Commission of Louisiana
Office of Special Counsel
Mrs. Nicole Jones King
123 N. Louisiana Ave.
Lake Charles, LA 70601

The Judiciary Commission of Louisiana

January 23, 2024

PERSONAL AND CONFIDENTIAL
Vincent Jerome King
123 N. Lieutenant Avenue
Lake Charles, LA 70611

RE: [illegible]

Dear Mr. King:

Your complaint against Judge Ronald Ricard was reviewed and assigned [illegible]. While the Office of Special Counsel has not taken a position as to your complaint at this time, we have offered Judge Ricard the opportunity to answer your complaint.

The Louisiana Constitution (Article V, Section 25(C)) and the Rules of the Louisiana Supreme Court (Rule XXIII, Section 23) require that all proceedings before the Judiciary Commission are confidential from the time a complaint is filed throughout the investigatory stage of proceedings. While this rule does not allow you to disclose to anyone the fact that you filed a complaint with the Commission or the Commission's actions on the complaint at this time, you may disclose and discuss the underlying events that led you to file a complaint. You also retain the confidentiality of Commission proceedings – we will not be able to provide you with any details about the status of your complaint while it is pending resolution.

We are not permitted to give you legal advice or to comment over legal matters. The Judiciary Commission does not have the authority to order a judge to recuse himself, to change [illegible] or to take any particular action. If you want a court order or a different outcome in your case, you should consult with your own attorney. [illegible]

You will be advised of the Commission's resolution of this file at that time. The Commission may subpoena you for [illegible] and to testify under oath before the Commission to advise the Judge about his or her ethical obligations under the Code of Judicial Conduct. These proceedings are private and confidential. The private investigation of a file is not necessarily a prosecution. Another possibility is that the Commission may, after an investigation, file a Notice of Hearing on that a Hearing Officer may hold an evidentiary hearing about the allegations. Then the Commission issues a file or files a Notice of Hearing, subpoenas, depositions, and witnesses are no longer prohibited from discussing or disclosing the Commission proceedings. For further understanding of the rules regarding Judiciary Commission

THIRD CIRCUIT COURT OF APPEAL

STATE OF LOUISIANA

****

NUMBER: CA - 25 - 0049

****

JOHN CLIFFORD KING
Plaintiff/Applicant

VERSUS

RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY
Defendants/Respondents

****

CIVIL DEVOLUTIVE APPEAL
FROM THE WARD 3/ LAKE CHARLES CITY COURT
DOCKET NO.: 23-2124
HONORABLE RON RICHARD
CALCASIEU PARISH, LOUISIANA

****

ORIGINAL REPLY BRIEF ON BEHALF OF RESPONDENTS

****

Respectfully submitted:

_____

EDWARD K. BAUMAN
1801 Ryan Street
Lake Charles, LA 70601
(337) 491-0570
La. Bar Roll No.: 22001
ed@lakecharlesattorney.com

CIVIL APPEAL

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STATEMENT OF THE CASE AND ACTION OF THE TRIAL COURT

Plaintiff, John Clifford King, listed his permanent residence as his mother's house located at 123 N. Louisiana Avenue, Lake Charles, Louisiana. After the hurricanes in 2020, Mr. King moved to New Jersey or New York State to work. Prior to leaving town, Mr. King left his 2011 red Chevrolet Traverse, La. License No. 346EYM, at his mother's house and allowed his former girlfriend and mother of his children, Ms. Charmaine Colston, to drive the vehicle. Mr. King claimed that "on or about September 7, 2021, [while he was in New Jersey or working in New York State] Charmaine Colston (either by herself or in conspiracy with someone else) appeared before a Notary, Renee Amos, in Lake Charles, La. and executed a fraudulent title transfer of the Chevrolet to Colston. Mr. King did not learn of this fraudulent transfer until August 25, 2022 when an investigative report of the Lake Charles Police Department was released to him. Meanwhile Charmaine Colston had sold the vehicle." (R.p. 708, Plaintiff's brief, p. 5). A suit filed by Mr. King in proper person against Ms. Colston was dismissed with prejudice on the basis of prescription on August 17, 2023. (R.pp. 59-62).

Mr. King filed suit in forma pauperis and in proper person against Notary, Mrs. Renee Amos, and later added her insurance carrier, Hartford Fire Insurance Company (Hartford), for executing a title transfer for Ms. Colston when he, the title owner, was not present and did not sign. Mr. King claims Mrs. Amos allegedly "undertook to provide illegal notarial services . . . well aware [they] were illegal . . . [and] lied and abused her professional powers." (R.pp. 9-13). Numerous pro se motions were filed and e-mails sent to the court by Mr. King before and during the time he was represented by two different attorneys Mr. King was able to retain despite pauper

status. Among the pro se motions were a Motion to Recuse/Remove Honorable Judge Ron Richard, a Motion to Vacate Retaliatory Judgments, a Motion to Strike and Seal Identifying Information From Public Record, and a Motion to Intervene and Prevent Further Judicial Harassment and Loss of Life. (R.pp. 592-600). It was determined that many of Mr. King's allegations were simply false.[1]

Trial in the matter was held on November 21, 2024. The Trial Court stated that it believed Mr. King when he testified he was out of state on September 7, 2021 when the title transfer occurred. However, the Trial Court also believed Mrs. Amos' testimony that although she had no recollection of this particular transaction in 2021, she testified that "my practice is to check the ID's of all parties, the buyer and the seller. (R.pp. 665, 755-756, 758-759). The Trial Court dismissed plaintiff's claims with prejudice and Judgment was signed, November 21, 2024. (R.p. 547). A Motion and Order for Devolutive Appeal was signed December 3, 2024. (R.p. 581).

---

[1] Mr. and Mrs. King had made allegations that the trial judge and his staff disclosed confidential information that led to the murder of an individual in Iowa, Louisiana. Apparently Mrs. King is a "protected crime victim from the State Attorney General's Office." (R.p. 721). Mrs. King claimed a man was shot six times at their in-laws and there were three helicopters searching for a suspect. The Trial Court noted there were no murders in Iowa this year and the nearest police helicopter was in Baton Rouge. (R.pp. 775-777). Mrs. King was also held in contempt for calling 9-1-1 and having EMTs show up and disrupt court, despite the fact that Mr. King stated he did not need medical attention. (R.p. 776).

ASSIGNMENTS OF ERROR

I). The Trial Court erred in denying Defendant's Peremptory Exception of Prescription as the case prescribed a year from the date of the alleged act.

II). Plaintiff alleges "the Trial Court erroneously applied the burden of proof; after plaintiff proved he was out of state at the time the Notary allegedly notarized his signature to the title transfer, the burden of proof should have shifted back to the Notary to prove she properly identified John Clifford King as the signor."

III). Plaintiff alleges "the Trial Court erred in faulting plaintiff for not calling Charmaine Colston as a witness since Colston was the perpetrator who stole the vehicle; either party could have subpoenaed Colston. But Colston's testimony was unnecessary. The Notary failed to identify John King or anyone else as the signor."

ISSUES ON APPEAL

I). The Trial Court denied Defendant's Peremptory Exception of Prescription. The alleged act in question occurred on September 7, 2021. Plaintiff was aware of this and reported the matter to the Calcasieu Parish Sheriff's Office on October 9, 2021. Suit was not filed until August 21, 2023. At no time did plaintiff attempt to contact the Louisiana State Police or the Department of Motor Vehicles. Plaintiff's case prescribed under La. R.S. 35:200.

II). Once the Trial Court was satisfied, through uncertified documents and the self-serving testimony of Mr. and Mrs. King, that Mr. King was out-of-state at the time Notary Amos notarized Mr. King's signature, should the burden of proof should have shifted back to the Notary to prove she properly identified Mr. King as the signor? The answer is an absolute No. All that is required of a Notary is to check identification and watch the individuals affix their signature to a document. If

anything, should the plaintiff first have the burden of proving the signature was indeed a forgery?

III). The Trial Court did not fault plaintiff for not calling Ms. Charmaine Colston as a witness. The Trial Court only said it would be helpful to have her present. The minutes conflict with the trial transcript and should be corrected.

STATEMENT OF THE FACTS

John Clifford King owned a 2011 red Chevrolet Traverse, La. License No. 346EYM, which he left at his mother's house after the hurricanes in 2020 and allowed his former girlfriend and mother of his children, Ms. Charmaine Colston, to use. According to Mr. King, he was in New Jersey or working in New York State on or about September 7, 2021. He claims that "Charmaine Colston (either by herself or in conspiracy with someone else) appeared before a Notary, Renee Amos, in Lake Charles, La. and executed a fraudulent title transfer of the Chevrolet to Colston." Mr. King claims in brief filed in proper person that he did not learn of this fraudulent transfer until August 25, 2022 when an investigative report of the Lake Charles Police Department was released to him. (Plaintiff's brief, p. 5). Meanwhile, Ms. Colston had sold the vehicle.[2] Mr. King testified that when he stopped paying for insurance on the Chevrolet, his license was suspended by the Louisiana Department of Motor Vehicles. (R.p. 708). Mr. King stated he paid off the $8,400 balance owed on the vehicle, and instituted suit against the Notary, Mrs. Renee Amos, for executing a title transfer for Charmaine Colston when he, the title owner, was not present and did not sign. (R.pp. 9-13). The Trial Court denied an exception of prescription filed

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[2] The name of the purchaser was never brought up in court. Perhaps this party have been subpoenaed also to see if he resembled Mr. King.

by Defense counsel, which Plaintiff's counsel state's "is not at issue here." (Plaintiff's brief, p. 7). Undersigned counsel disagrees with this statement.

Trial on the merits was held on November 14, 2024. The Trial Court, Hon. Ron Richard, was satisfied from the evidence presented that Mr. King was out-of-state on September 7, 2021, when the title transfer occurred. (R.pp. 755-759). The Trial Court also felt the Notary's testimony that, although she had no recollection of this particular transaction, she testified that "my practice is to check the ID's of all parties, the buyer and the seller." (R.pp. 756-757). The Trial Court dismissed plaintiff's claims with prejudice. (R.p. 547).

SUMMARY OF THE ARGUMENT

The Trial Court erred in denying Hartford and Mrs. Renee Amos' exception of prescription and allowing this matter to proceed to trial. Suit was filed well over a year from when Mr. King discovered the alleged fraudulent act, as well as the name of the Notary involved. (R.p. 62). Hartford and Mrs. Amos' exception fo prescription should have been granted as was Ms. Colston's exception of prescription. (R.p. 62).

The Trial Court found Mr. King to be credible when he testified he was out-of-state when his signature was notarized. Plaintiff erroneously believes "the burden of proof should [then] have shifted to defendant, Notary, to exculpate herself from presumed negligence or co-conspiracy with Colston in the transaction." Plaintiff contends that the "fact that the Notary claimed she always checks ID's and does not remember the incident on September 7, 2021, failed to absolve her of responsibility for executing a transfer when the owner was not present."

Mrs. Amos, a Notary for over 20 years, is not expected to remember every

"incident" over the past 20 years. Her testimony was deemed credible, she always followed the same procedure, and the Trial Court was correct in its ruling. The plaintiff feels that the Trial Court faulted plaintiff for not calling Ms. Colston as a witness. A reading of the minutes and the trial transcript reveals that the Trial Court did not fault the plaintiff. The Trial Court merely stated that it would been helpful to have Ms. Colston testify and that her testimony could have swayed the Trial Court one way or the other. (R.pp. 757, 760).

ARGUMENT

I). The Trial Court erred in denying Defendant's Peremptory Exception of Prescription.

On January 25, 2024, a hearing was held, wherein the Trial Court denied Hartford and Mrs. Amos' Peremptory Exception of Prescription. The alleged fraudulent act in question occurred on September 7, 2021. Suit was filed by Mr. King in proper person on August 21, 2023. (R.pp. 9-14). On October 9, 2021, Mr. King filed a report with the Calcasieu Parish Sheriff's Office, "in reference to a forged title. King reported his ex-girlfriend, Charmaine Colston, some how obtained the title to his vehicle . . . and forged his signature." (R.p. 22).[3] The record fails to show Mr. King took any further action such as contacting the Louisiana State Police or DMV, or attempting to locate Ms. Colston or his vehicle in order to mitigate his damages.[4] He never hired an attorney to correct the matter or have the fraudulent sale annulled.

In his brief and pleadings filed with this Honorable Court, Mr. King incorrectly alleges he was not made aware of the "fraudulent transfer until August 25, 2022 when an investigative report of the Lake Charles Police Department was released to him, thus providing the name of the Notary." (R.p. 10, Plaintiff's brief, p. 5). However, Plaintiff was aware of the "fraudulent transfer" on October 9, 2021, and was given a copy of the title showing the name of the Notary, Mrs. Renee Amos. As per Mr.

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[3] A person denying the validity of a signature on a notarized instrument bears the burden of proof that the signature is a forgery. LSA-C.C. Art. 1835. 3 *Succession of Velasquez-Bain*, 415 So. 2d 1013 (La. App. 4 Cir. 1982), *on appeal after remand*, 471 So. 2d 731 (La. App. 4 Cir. 1985); *Coleman v. Egle*, 376 So. 2d 983 (La. App. 1 Cir. 1979), *writ denied*, 379 So. 2d 15 (La. 1980).

[4] The duty to mitigate damages exists in both tort and contract law. *Altazan v. Pontchartrain Dredging Corp*., 385 So. 2d 292 (La.App. 1st Cir.1980).

King's trial testimony, he was given a copy of the title when he filed a complaint with the Calcasieu Parish Sheriff's Office on October 9, 2021. By October 19, 2021, detectives knew the names of all parties affixed to the title. (R.pp. 42,44,675).

> Louisiana Revised Statute 35:200 provides, in pertinent part:
>
> Limitation on actions
>
> A. No action for damages against any notary public duly commissioned in any parish in this state, any partnership of such notaries public, or any professional corporation, company, organization, association, enterprise, or other commercial business or professional combination answerable for the damage occasioned by such notary public in the exercise of the functions of a notary public, whether based upon tort, or breach of contract, or otherwise, arising out of an engagement to provide notarial services shall be brought unless filed in a court of competent jurisdiction and proper venue within **one year from the date of the alleged act, omission, or neglect, or within one year from the date that the alleged act, omission, or neglect is discovered or should have been discovered**; however, even as to actions filed within one year from the date of such discovery, in all events such actions shall be filed at the latest within three years from the date of the alleged act, omission, or neglect. (Emphasis added).
>
> * * *
>
> E. The peremptive period provided in Subsection A of this Section shall not apply in cases of fraud, as defined in Civil Code Article 1953.

Louisiana Civil Code Article 1953 provides that, "Fraud is a misrepresentation or a suppression of the truth made with the intention either to obtain an unjust advantage for one party or to cause a loss or inconvenience to the other. Fraud may also result from silence or inaction." Louisiana Code Civil Procedure Art. 856 also requires that, "In pleading fraud or mistake, the circumstances constituting fraud or mistake shall be alleged with particularity. Malice, intent, knowledge, and other condition of mind of a person may be alleged generally." Fraud cannot be predicated on mistake or negligence, no matter how gross. Fraudulent intent, which constitutes the intent to deceive, is a necessary element of fraud. *Whitehead v. American*

Coachworks, Inc., 02-0027, p. 6 (La. App. 1 Cir. 12/20/02), 837 So.2d 678, 682.

Plaintiff's petition, filed in proper person, does not sufficiently set forth the particular allegations of fraud that would exempt him from the preclusive effect of the peremption statute. Additionally, the Trial Court based its ruling denying Mrs. Amos' exception of prescription on an erroneous interpretation of the law. La. R.S. 35:200 provides that any actions for damages shall be filed "**within one year from the date of the alleged act**, omission, or neglect, or within one year from the date that the alleged act, omission, or neglect is discovered or should have been discovered." The Trial Court, however, held that the plaintiff had met his burden by filing **within one year of learning the name of the notary** that he contends committed a tortuous act, and not one year from when he discovered the alleged act. (R.pp. 154-155). This same Trial Court dismissed a lawsuit Mr. King filed against Ms. Colston on August 17, 2024, finding that his case had prescribed. (R.pp. 59-62).

As plaintiff failed to allege or prove any fraud or intent on the part of Ms. Amos to deceive Mr. King, this case prescribed on October 29, 2022 and is not subject to Subsection E of 35:200. Therefore, it was error for the Trial Court to deny Hartford and Mrs. Amos' exception of prescription, and this appeal should be dismissed.

II). The Trial Court did not erroneously apply the wrong burden of proof. After plaintiff proved he was out of state at the time the Notary allegedly notarized his signature to the title transfer, the burden of proof should not have shifted back to Mrs. Amos to prove she properly identified John Clifford King as the signor.

Plaintiff's counsel believes that after the court found Mr. King to be credible, despite he and his only witness/wife both being caught by the court fabricating stories, the burden of proof should have shifted to Mrs Amos to exculpate herself.

The case cited by plaintiff, *Lawrence v. Government Employees Insurance Company*, 13-1296 (La.App. 4 Cir. 10/15/14), 151 So.3d 917 as well as the cases cited in *Lawrence*, are distinguishable as they involve personal injury cases, the result of automobile accidents, and not a case where there are allegations of intentional fraud or deception. Nevertheless, Mrs. Amos testified and was found to credible and free from fault by a preponderance of the evidence.

In his Memorandum of Law, plaintiff cites *Collins v. Collins*, 629 So.2d 1274, 1276 (La. App. 5 Cir. 1993), *writ denied*. 94-0422 (La. 4/4/94), 635 So.2d 1110, in answering the question he poses to himself, "**IS A NOTARY LIABLE FOR FAILING TO IDENTIFY THE SELLER IN A BILL OF SALE? YES!**" This question, however, is misleading and so is the *Collins* decision.

Collins merely held that a notary **may** be liable both for deliberate misfeasance in the course of his official duties and for negligence in performing those duties. **The court in that case reversed the granting of the defendants' exceptions of no cause of action, finding that the plaintiff had stated a cause of action** against the notary by alleging that the notary violated his notarial obligation by notarizing an act of sale while he knew or should have known that the person signing was not who they purported to be and/or by failing to request identification. *Collins*, 629 So.2d at 1277.

The court in *Collins* only addressed the exception of no cause of action filed by defendant. The court did not make the ultimate determination as to whether the defendant committed deliberate misfeasance and/or negligence. The cases relied on by *Collins* and cited in plaintiff's brief can also be distinguished. In *Summers Brothers, Inc. v. Brewer*, 420 So. 2d 197, 204 (La.App. 1 Cir. 1982), the first circuit relied upon decisions involving active fraud by the notary, including *Lacour* and

Rochereau, to reach the conclusion that the notary committed fraud when he authenticated a document after it was previously signed, despite the fact that the notary was unaware the signatures were forgeries.[5] Also cited is *Levy v. Western Casualty & Surety Co.*, 43 So.2d 291 (2nd Cir. 1949), which recognized that under certain circumstances, a notary could be negligent for failing to get proof of identification from a person signing a document in his presence, and *Webb v. Pioneer Bank & Trust* Co., 530 So.2d 115 (2nd Cir. 1988), where the second circuit found that the notary who notarized the note in the mortgage but could not recall whether the wife's signature was affixed in his presence was negligent for failing to exercise ordinary care in ascertaining the genuineness of the signature allegedly fixed in his presence.

Mrs. Amos, a Notary for over twenty years, testified it is always her practice to check identification and watch the parties affix their signatures. She sees numerous people in a day. If Mrs. Amos had any suspicions, she would call her local Justice of the Peace. (R.pp. 665, 667-668). Plaintiff contends that Mrs. Amos's responses that she did not recall this particular transaction, but that she always get identification, but does not keep copies, is an inadequate defense. (Plaintiff's brief, p. 11). This is plaintiff's feelings regarding the matter. Plaintiff fails to cite any law or jurisprudence requiring a Notary to do more. Undersigned counsel could not find anywhere in the Fundamentals of Louisiana Notarial Law and Practice handbook where a Notary is required to keep copies.

"The notary must exercise the care of a reasonable 'prudent businessman' in

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[5] *Lacour v. National Surety Co. of New York*, 147 La. 586, 85 So. 600 (La. 1920); and *Roche re reau v. Jones*, 29 La.Ann. 82 (La. 1877).

ascertaining the identity of an affiant or a party executing a document. *Howcott v. Talen*,(see below). A state issued drivers license bearing a photograph of the party is customary identification document required by notaries. Louisiana Department of Public Safety also issues an identification card for non-drivers. A United States passport or military identification is also considered proof of identity."[6]

In the case of *Howcott v. Talen*, 133 La. 845, 63 So. 376 (La. 1913), the Supreme Court of Louisiana summarized the responsibility of a notary with regard to identification of persons appearing before him in the following language:

> In fact, so long as he [(the notary)] exercises the precaution of an ordinarily prudent business man in certifying to the identity of the persons who appear before him, it may be doubted whether he has any othet [sic] function to discharge ...

Howcott, 133 La. at 852, 63 So. at 379.

Mrs. Amos did what is required of her as a Notary Public. She is not required to make and keep copies for the last 20 years. It would be especially impossible for a mobile notary to have to make copies. It is not surprising that Mrs. Amos does not remember a particular transaction from 2021. Even Perry Mason would have difficulty remembering all of his clients from his one hundred and fifty plus episodes. Mrs. King is not a facial identification expert or a handwriting expert. Mrs. Amos did not know either party had nothing to gain by committing any fraud or engaging in any deceit. If anything, fraud was committed on Mrs. Amos. As plaintiff himself noted, it is possible that an imposter, in conspiracy with Colston, produced Mr. King's identification. (Plaintiff's brief, p. 13). As Mr. King produced a copy of Ms. Colston's driver's licence in court, it is highly likely she had a copy of Mr. King's. (R.p. 797).

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[6] Jennings, Bullock and Johnson, *Fundamentals of Louisiana Notarial Law and Practice*, p. 47 (2022).

Plaintiff's counsel also seems to believe the Trial Court could not find Mr. King and Mrs. Amos both credible. In *Nelson v. Zurich Insurance Co.*, 247 La. 438, 446, 172 So.2d 70, 72 (1965), the Louisiana Supreme Court observed:

> 'Where witnesses differ, the courts should reconcile, if possible, the apparent contradictions their testimony presents. If this cannot be done, then the probabilities or improbabilities of their respective statements must be considered in the light of their capacity, opportunity or incentive for observation, the amount of corroboration, if any, and the degree of proof required.' *Fridge v. Talbert*, 180 La. 937, 158 So. 209 [(1934)].

The supreme court in *Nelson* at 72 further explained:

> Where the evidence is truly in equipoise and neither of the opposing plaintiffs satisfies the burden of proof by a preponderance of the evidence, must the trial judge nevertheless decide for one of the parties? We think not.

Undersigned counsel disagrees with the Trial Court's decision regarding the credibility of Mr. King and Mrs. King. The documents relied on by Trial Court, allegedly corroborating his story that he was out-of-state, were proffered as they were not properly authenticated and Defense counsel objected to their admission. (R.pp. 814-835).

III). Plaintiff alleges "the Trial Court erred in faulting plaintiff for not calling Charmaine Colston as a witness since Colston was the perpetrator who stole the vehicle; either party could have subpoenaed Colston. But Colston's testimony was unnecessary. The Notary failed to identify John King or anyone else as the signor."

Plaintiff alleges that the Trial Court faulted him for not calling Ms. Colston as a witness. A reading of the minutes and the trial transcript reveals that the Trial Court did not fault plaintiff. The Trial Court merely stated that it would been helpful to have Ms. Colston testify and asked if anybody subpoenaed her. Mrs. King interjected and said Ms. Colston was subpoenaed. Plaintiff's counsel stated he did not have enough time to subpoena her otherwise he would have. (R.p. 752). In its reasons for ruling, the Trial Court stated, "and the Court finds that her [Mrs. Amos'] explanation of what occurred to be reasonable and that indeed, Ms. Colston's testimony could have swayed the Court one way or the other. That being the case, judgment in favor of defendant." (R.p. 760).

It is noted that the minutes incorrectly state that "Ms. Colston's testimony could have swayed the Court but plaintiff failed to subpoena her." (R.p. 7).[7]

CONCLUSION

Hartford Fire Insurance Company and Mrs. Renee Amos, Notary Public, pray that this Honorable Court affirms the judgment of the Lake Charles City Court, Ward 3, as this case had prescribed and Notary, Mrs. Renee Amos did exactly what was expected of her as a Louisiana Notary Public.

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[7] When there is a discrepancy between the minutes and the transcript, the transcript prevails. *State v. Lynch*, 441 So. 2d 732 (La. 1983)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing Appellee brief has been delivered to Oliver "Jackson" Schrumpf, Attorney for Mr. King, 3801 Maplewood Drive, Sulphur, LA 70663, by placing the same in the United States mail, postage prepaid, this __day of March, 2025.

Respectfully submitted:

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CERTIFICATE OF NO ATTACHMENTS

"I hereby verify that there are no attachments required with this brief."

Edward K. Bauman

Affidavit of Transmission

Attention: John King Fax No. 1-609-378-0076

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: May 2, 2023

Docket No. 23-1206 John King vs. Charmain Colston – 2 pages received – New Suit Petition

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee $250.00
3. A transmission fee of $5 dollars.

Total Amt. Due: $255.00

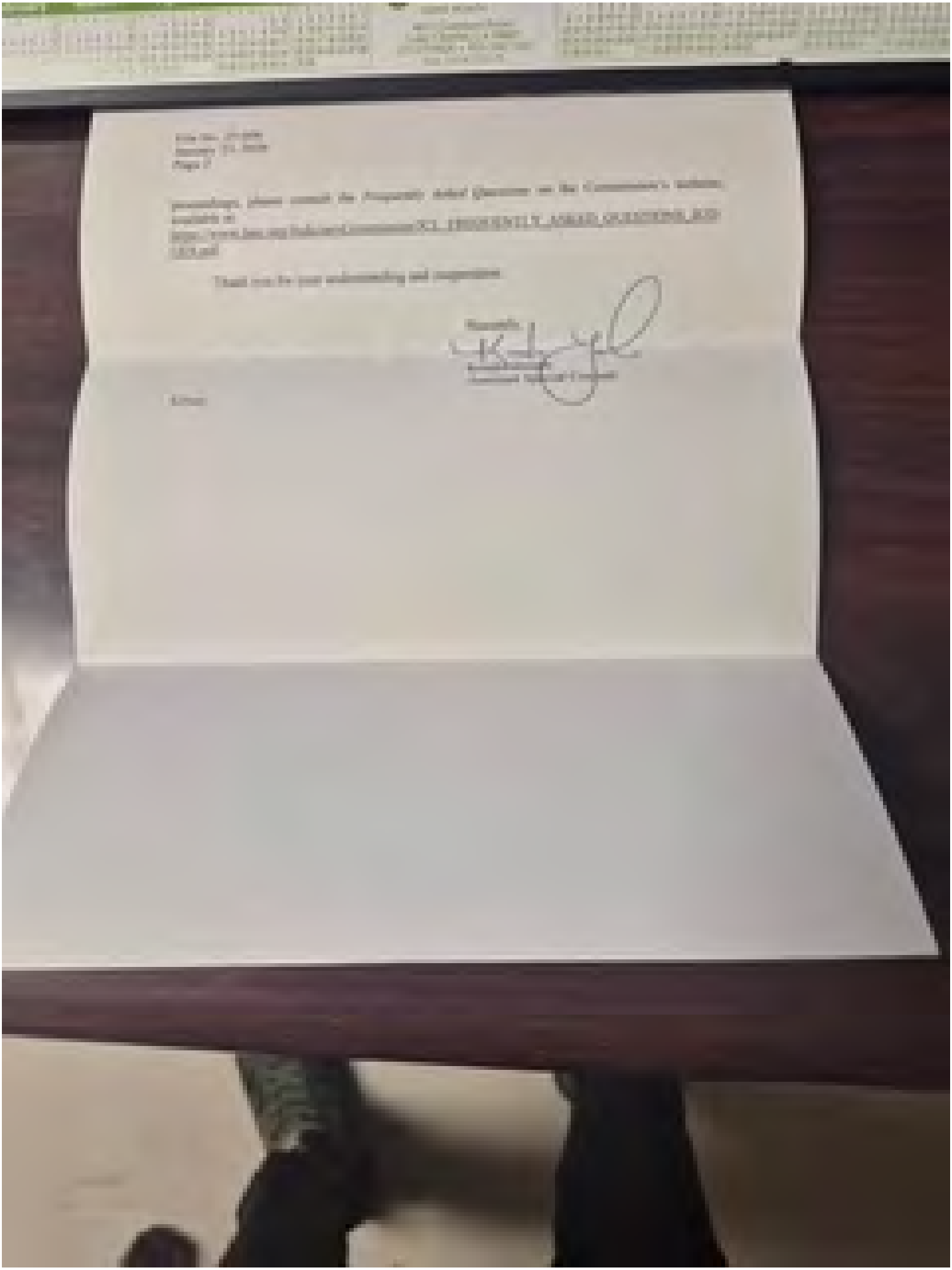
Monica Abshire, Clerk of Court

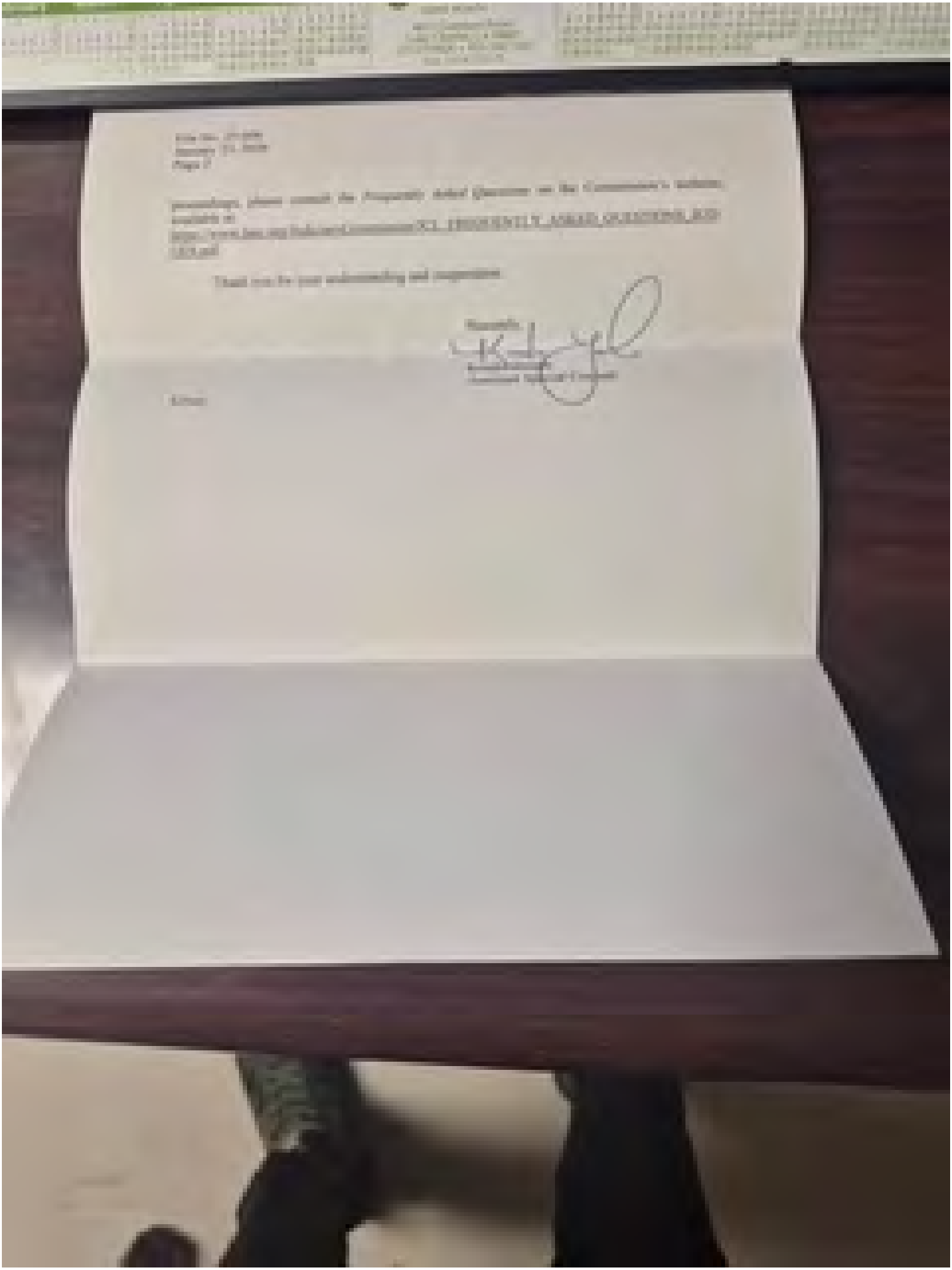
Lake Charles City Court

P. O. Box 1664

Lake Charles, LA 70602


Purell
SURFACE





Suit No.: 23-2124

JOHN CLIFFORD J KING

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Deft. Dep. #764.00

Third party Deposit $2900
Third party Cost $2900

Cost Summary	
Deposits:	$2,505.50
Court Cost:	($2,215.70)
Refund:	$0.00
Balance:	$289.80

Plaintiff Deposits (not including Transcript Deposit) → : $1000.00

Cost to date: $2186.70

Date	*Minutes*			
8/24/2023	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS.	*Code:*	AC	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
8/24/2023	DEFAULT COURT COST	*Code:*	DCC	*ServType:*
		Deposit:		
		Cost:	$56.50	*ServCost:*
8/24/2023	CLAIM: DAMAGESAS PER FAX FILED PETITION (6PAGES); C/SUPPLEMENTAL REPORT(2); CPSO OFFENSE REPORT(4); CPSO CASE REPORT(4) C/WELD INSPECTION(7); C/SOUTHWEST CREDIT UNION DOCS(2); C/CAPITAL ONE(7); C/REGISTRATION(1); C/VEHICLE APPLICATION(1); CASE REPORT SUMMARY(1); C/CERTIFICATE OF TITLE(2); C/LICENSE(1); C/CASE SUMMARY(1) FILED HEREINPETITION (6PAGES) 1/CC 1/CONFEXHIBITS(33)FAX FILING FEE $5.00	*Code:*	CL	*ServType:*
		Deposit:		
		Cost:	$95.00	*ServCost:*

9/1/2023	CITATION ISSUED (RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 AT 1208 17TH STREET LAKE CHARLES LA, 70601)	*Code:*	CII	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
9/5/2023	ADDED DEPOSIT FROM JOHN KING OF $255.00 ADV DEP	*Code:*	PD	*ServType:*	
		Deposit:	$255.00		
		Cost:		*ServCost:*	
9/5/2023	2 COPIES OF THE PETITION 1 FOR SERVICE, 1 FOR PLT12 PAGES @ $2.00	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$24.00	*ServCost:*	
9/12/2023	DEFENDANT RENEE AMOS PEREMPTORY EXCEPTIONS OF PRESCRIPTION, RULE TO SHOW CAUSE, C/JUDGMENT OF DISMISSAL WITH PREJUDICE, C/CPSO SUPPLEMENTAL NARRATIVE /INITIAL REPORT, C/CPSO OFFENSE REPORT RECEIPT, AND C/CASE REPORT FILED HEREIN.**ORDER SIGNED BY JUDGE JAMIE B. BICE 9/13/2023**EXCEPTIONRULE1 AT $6 EACH9 AT $2 EACH1 CONFORMED COPY TO ATTY DOMINIC1 CC TO BE SERVED TO PLTF	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$44.00	*ServCost:*	
9/12/2023	ADDED DEPOSIT FROM KAMIE DOMINIC OF $150.00 ADD DEP FOR EXCEPTION	*Code:*	DD	*ServType:*	
		Deposit:	$150.00		
		Cost:		*ServCost:*	
9/20/2023	HEARING NOTICE OF EXCEPTION RULE SET FOR WEDNESDAY 11/15/2023 AT 9:00 AM MAILED TO DEFT ATTY., KAMIE T. DOMINIC	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

9/20/2023	RULE: EXCEPTION DATE: WEDNESDAY 11/15/2023 AT 9:00 AM	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	
9/20/2023	CITATION ORDER ISSUED TO: (KING, JOHN CLIFFORD J AT 123 N. LOUISIANA AVENUE LAKE CHARLES LA 70601) EXCEPTION	*Code:*	CIO	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
11/7/2023	FAX FILED MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/08/23.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
11/13/2023	RECEIVED ORIGINAL MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/16/23.MOTION/2CCDOCS/2EXHIBITS/6COPIES/18	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$76.00	*ServCost:*	
11/13/2023	CC / JOHN KINGADD DEP / FOR MOTIONS TO CONTINUE AND QUASH	*Code:*	PD	*ServType:*	
		Deposit:	$255.00		
		Cost:		*ServCost:*	
11/28/2023	HEARING NOTICE FOR EXCEPTION SET FOR WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM MAILED TO DEFENDANT, RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC.	*Code:*	NO	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
11/28/2023	NOTICE OF MOTION FOR CONTINUANCE AND MOTION TO QUASH ISSUED TO: RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC AT 1400 RYAN ST., LAKE CHARLES, LA 70601	*Code:*	JF	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00

11/28/2023	RULE REFIXED: EXCEPTIONDATE: WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	
11/28/2023	CITATION ORDER ISSUED TO WITH C/MOTION FOR CONTINUANCE AND MOTION TO QUASH: JOHN CLIFFORD J KING AT 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601	*Code:*	CIO	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
1/4/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
1/5/2024	CC / JOHN KINGADD DEP / FOR FAX FILING FEE AND SUBPOENA	*Code:*	PD	*ServType:*	
		Deposit:	$55.00		
		Cost:		*ServCost:*	
1/5/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	*Code:*	SUB	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
1/16/2024	FAX FILED - MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
1/17/2024	RULE: EXCEPTION (RE-FIXED)DATE: THURSDAY, JANUARY 25, 2024 @ 9:00 AM**2 NOTICES MAILED**	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	

1/17/2024	PLTF FAILS TO APPEAR; DEFT APPEARS W/ATTY; MOTION TO CONTINUE GRANTED; CONTINUED UNTIL 1/25/2024 @ 9:00 AM; NOTICE TO BE SENT TO BOTH PARTIES. RCR	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
1/17/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $0.00	*ServCost:*		
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $0.00	*ServCost:*		
1/17/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	*Code:* SUB	*ServType:* MF3		
		Deposit:			
		Cost: $10.00	*ServCost:*	$30.00	
1/19/2024	REQUEST FOR A COPY OF THE EXCEPTIONS FILED HEREIN BY DEF ATTY KAMIE T DOMINIC	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $6.00	*ServCost:*		
1/19/2024	1 COPY OF DEFENDANT PEREMPTORY EXECEPTIONS OF PRESCRIPTION4 PAGES @ $2.00	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $8.00	*ServCost:*		

1/19/2024	ADDED DEPOSIT FROM KAMIE T. DONINIC OF $14.00 ADD DEP/CF OF PEREMPTORY EXECEPTIONS	*Code:* DD *Deposit:* $14.00 *Cost:*		*ServType:* *ServCost:*
1/22/2024	RECEIVED ORIGINAL LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.REQUESTDOC/1EXHIBIT/1	*Code:* JF *Deposit:* *Cost:*	$14.00	*ServType:* *ServCost:*
1/22/2024	ADDED DEPOSIT FROM JOHN KING OF $80.00 /SUBPOENA	*Code:* PD *Deposit:* $80.00 *Cost:*		*ServType:* *ServCost:*
1/23/2024	RECEIVED ORIGINAL MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE. **SIGNED BY JUDGE ** EXHIBIT ATTACHED (3 PAGES)MOTION/ORDEREXH - 3 PAGES	*Code:* JF *Deposit:* *Cost:*	$18.00	*ServType:* *ServCost:*
1/23/2024	LETTER TO CONTEST COURT FEES FOR JANUARY 17, 2024 FILED HEREIN BY PLTF **BUT NOT SIGNED**	*Code:* JF *Deposit:* *Cost:*	$6.00	*ServType:* *ServCost:*
1/24/2024	FAXED LETTER FILED HEREIN BY ATTY ORELIA R. LAWDINS-TRENT INFORMING THE COURT OF THE RECEIVED SERVICE OF A SUBP (ISSUED AT PLTF REQUEST) FOR CHARMAINE Y. COLSTON, AS THEY DO NOT REPRESENT MS. COLSTON IN THIS MATTER & SHE IS NOT A PARTY TO THIS PROCEEDING; SINCE OFFICE IMPROPERLY SERVED, HAS NOT FORWARDED TO MS. COLSTON; ADDITIONALLY CANNOT ASSUME ANY RESPONSIBILITY FOR HER APPEARANCE OR REQUIRE HER PRESENCE AT ANY HEARINGS IN THIS MATTER	*Code:* JF *Deposit:* *Cost:*	$6.00	*ServType:* *ServCost:*

1/25/2024	PLTF APPEARS THRU ATTY, DUSTAN ABSHIRE; DEFT APPEARS WITH ATTY, KAMIE DOMINIC; PRE-TRIAL CONFERENCE HELD; DUSTAN ABSHIRE APPEARS TODAY FOR THE LIMITED PURPOSE OF THIS EXCEPTION HEARING; ARGUMENT AND INFORMATION GIVEN; EXCEPTION REQUEST IS OVERRULED; OBJECTION TO RULING NOTED FOR THE RECORD; MATTER SET FOR TRIAL ON THURSDAY, MARCH 21, 2024 AT 9:00 AM; NOTICE GIVEN IN OPEN COURT AND TO BE MAILED. RCR	*Code:* JF *Deposit:* *Cost:* $7.00	*ServType:* *ServCost:*
2/7/2024	NOTICE OF ANSWER FILED HEREIN BY DEFENDANT RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 ISSUED TO PLTF JOHN KING, 123 N LOUISIANA AVENUE, LAKE CHARLES, LA 70601	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:* $30.00
2/7/2024	ANSWER FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; FAX: 337-426-8763; *CERTIFICATE OF SERVICE*ANSWER (2 PAGES)/1CC	*Code:* JF *Deposit:* *Cost:* $13.00	*ServType:* *ServCost:*
2/8/2024	ADDED DEPOSIT FROM KAMIE DOMINIC FOR ANSWER OF $25.00	*Code:* DD *Deposit:* $25.00 *Cost:*	*ServType:* *ServCost:*
2/23/2024	REQUEST FOR CERTIFIED COPIES RECEIVED BY CHARMAINE COLSTON. **NOTIFIED COST FOR CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00 PLUS REQ. $6.00 TOTAL AMT. REQUIRED - $29.00**	*Code:* NO *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
2/27/2024	REQUEST FOR CERTIFIED COPIES FILED HEREIN BY CHARMAINE COLSTON.	*Code:* JF *Deposit:* *Cost:* $6.00	*ServType:* *ServCost:*

Backed out this cost

2/27/2024	CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$23.00	*ServCost:*
2/27/2024	ADDED DEPOSIT FROM CREDIT CARD/CHARMAINE COLSTON FOR CERTIFIED COPIES OF $29.00	*Code:*	TPD	*ServType:*
		Deposit:	$29.00	
		Cost:		*ServCost:*
3/7/2024	TRIAL FIXED FOR THURSDAY, MARCH 21, 2024 @ 9:00 AM; 2 NOTICES MAILED.	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$8.00	*ServCost:*
3/7/2024	FAX FILED - REQUEST FOR SUBPOENA W/ATTACHED WITNESS SUBP. ACKNOWLEDGEMENT FORM FILED HEREIN BY PLTF IN PROPER PERSON. **REQUEST TO SERVE ATTY ORELIA LAWDINS-TRENT C/O HER CLIENT CHARMAINE COLSTON, LAWDINS GALLIEN FIRM, 1504 MARTIN LUTHER KING HWY STE A, LAKE CHARLES, LA 70601**FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*
		Deposit:		
		Cost:	$7.36	*ServCost:*
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*
		Deposit:		
		Cost:	$7.36	*ServCost:*

Backed out this cost

Do not give credit for this Deposit

3/11/2024	**PER JUDGE RICHARD - DISREGARD PLTFS REQUEST FOR SUBP TO BE SERVED TO ATTY ORELIA LAWDINS TRENT C/O HER CLIENT CHARMAINE Y. COLSTON - REFER TO ATTY ORELIA LAWDINS-TRENTS LETTER FILED INTO THE RECORD ON 1/24/2024 WHEREIN SHE ADVISED THE COURT SHE IS NOT THE ATTY OF RECORD FOR MS. COLSTON, AS SHE IS NOT A PARTY IN THIS MATTER**	*Code:* NO *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*	
3/19/2024	MOTION TO CONTINUE (2 PAGES); ORDER TO REFIX TRIAL FILED HEREIN BY DEFT THRU ATTY KAMIE T. DOMINIC **PLTF OPPOSES**MOTION (2 PAGES)/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $24.00	*ServType:* *ServCost:*		
3/19/2024	ADDED DEPOSIT FROM KAMIE TRAMAIN DOMINIC OF $100.00	*Code:* DD *Deposit:* $100.00 *Cost:*	*ServType:* *ServCost:*		
3/21/2024	TRIAL RE-FIXED DATE: WEDNESDAY, MAY 8, 2024 AT 9:00**NOTICE GIVEN IN OPEN COURT***	*Code:* JF *Deposit:* *Cost:* $8.00	*ServType:* *ServCost:*		
3/21/2024	PLTF APPEARS W/ATTY DUSTAN ABSHIRE; DEFT APPEARS W/ATTYS KAMIE DOMINIC & ED BAUMAN; FTR, OBJECTION TO THE MOTION TO CONTINUE BY PLTF ATTY DUSTAN ABSHIRE, REQUEST DENIED; MOTION TO CONTINUE BY DEFT ATTY KAMIE DOMINIC GRANTED & SIGNED IN OPEN COURT; TRIAL SET FOR WEDNESDAY, MAY 8, 2024 AT 9:00 AM; PLTF ATTY REQUESTS ZOOM COURT FOR MR. KING, REQUEST DENIED; NOTICE GIVEN TO ALL PARTIES IN OPEN COURT. RCR	*Code:* JF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
3/25/2024	NOTICE OF MOTION & ORDER TO CONTINUE & REFIX TRIAL ISSUED TO: (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	

4/25/2024	MOTION TO RECONSIDER DEFENDANT RENEE AMOS PEREMPTORY EXCEPTION OF PRESCRIPTION; MEMORANDUM IN SUPPORT OF MOTION TO RECONSIDER DEFT PEREMPTORY EXCEPTION (3 PAGES); EXH A (2 PAGES) FILED HEREIN BY DEFT THRU ATTY KAMIE DOMINIC.MOTION/MEMO (3 PAGES)/CC1 EXH (2 PAGES)	*Code:* JF *Deposit:* *Cost:* $25.00	*ServType:* *ServCost:*		
4/25/2024	NOTICE OF MOTION TO RECONSIDER DEFENDANTS PEREMPTORY EXCEPTION OF PRESCRIPTION ISSUED TO (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	
4/25/2024	ADDED DEPOSIT FROM CREDIT CARD/KAMIE TRAMAIN DOMINIC FOR MOTION TO RECONSIDER DEFT EXCEPTION OF $100.00	*Code:* DD *Deposit:* $100.00 *Cost:*	*ServType:* *ServCost:*		
5/8/2024	PLTF APPEARS W/ATTY JOHN CLIFFORD J. KING; DEFT APPEARS W/ATY KAMIE DOMINIC; COURT GRANTS PLAINTIFF'S ORAL MOTION TO RESET HEARING AND TO AMEND PLEADINGS TO INCLUDE HARTFORD LIFE INSURANCE COMPANY; MATTER RE-FIXED UNTIL THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; NOTICES TO BE SENT TO ALL PARTIES. RCR	*Code:* JF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
5/15/2024	TRIAL RE-FIXED FOR THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; 2 NOTICES MAILED.	*Code:* JF *Deposit:* *Cost:* $8.00	*ServType:* *ServCost:*		
5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY DUSTAN J. ABSHIRE, 334 KIRBY ST. LAKE CHARLES, LA 70601	*Code:* PC *Deposit:* *Cost:* $5.04	*ServType:* *ServCost:*		

5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*	
		Deposit:			
		Cost:	$5.04	*ServCost:*	
5/20/2024	FAX FILED - PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTFFAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
5/30/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $5.00	*Code:*	PD	*ServType:*	
		Deposit:	$5.00		
		Cost:		*ServCost:*	
5/31/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTF **UP FOR REVIEW ** DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD**	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
6/4/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD. CC TO PLTF ATTY DUSTAN ABSHIRE.	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$11.00	*ServCost:*	
6/13/2024	SUPPLEMENTING PETITION (2 PAGES); ORDER; AFFIDAVIT AND COVER LETTER FILED HEREINPETITION (2 PAGES)/3CCDOCS/3	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$41.00	*ServCost:*	
6/13/2024	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS. **AMENDING PARAGRAPH 2 AND ADD DEFENDANT HARTFORD FIRE INSURANCE COMPANY**	*Code:*	AC	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

6/13/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM OF $300.00 ADD DEP FOR SUPPLEMENTAL PETITION	*Code:* PD		*ServType:*	
		Deposit: $300.00			
		Cost:		*ServCost:*	
6/14/2024	CHECK REQUEST ID# 21090 FOR PREPAYMENT SERVICE FEE SUBMITTED TO COMPTROLLER	*Code:* NO		*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (RENEE AMOS THRU ATTY: KAMIE T. DOMINIC AT 1400 RYAN ST. LAKE CHARLES LA, 70601)	*Code:* CII		*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (HARTFORD FIRE INSURANCE COMPANY THRU: LOUISIANA SECRETARY OF STATE AT 8585 ARCHIVES AVE BATON ROUGE LA, 70809)**MAILED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE** CK. NO. 038877 ISSUED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE	*Code:* CII		*ServType:*	SF
		Deposit:			
		Cost:	$10.00	*ServCost:*	$40.40
6/17/2024	PREPAYMENT OF SERVICE FEE. CHECK #038725 PAID TO: SECRETARY OF STATES OFFICE	*Code:* SF		*ServType:*	
		Deposit:			
		Cost:	$50.00	*ServCost:*	
6/18/2024	MOTION AND ORDER TO WITHDRAW DUSTAN J. ABSHIRE AS COUNSEL OF RECORD FOR PLTF, JOHN CLIFFORD J KING; ORDER SIGNED BY JUDGE RONALD C. RICHARD ON 6/20/2024; COPY OF LETTER W/EMAIL FILED HEREIN BY ATTY DUSTAN J. ABSHIRE. CERT OF SERVICE. COVER LETTER FILED. COPY TO ATTY ABSHIRE. COPY TO PLTF.CVR LTR/MOTION/ORDER/COPY2 EXH	*Code:* JF		*ServType:*	
		Deposit:			
		Cost:	$25.00	*ServCost:*	

6/20/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM, LLC OF $25.00 ADD DEP MOTION& ORDER TO WITHDRAW AS COUNSEL OF RECORD	*Code:* PD *Deposit:* $25.00 *Cost:*		*ServType:* *ServCost:*
6/21/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO PLTF, JOHN CLIFFORD J KING @ 123 N LOUISIANA AVE, LAKE CHARLES, LA 70601	*Code:* NO *Deposit:* *Cost:*	$0.00	*ServType:* *ServCost:*
6/24/2024	COPY OF PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.**THE ORIGINAL THAT WAS FILED 5/31/2024 ATTACHED TO THIS COPY FOR JUDGE RICHARDS REVIEW** DENIED DUE TO NO 3RD PARTY AFFIANT PROVIDED**	*Code:* JF *Deposit:* *Cost:*	$0.00	*ServType:* *ServCost:*
6/27/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF HAS FAILED TO PROVIDE A THIRD PARTY AFFIANT. CC TO PLTF.ORDER/CC	*Code:* JF *Deposit:* *Cost:*	$11.00	*ServType:* *ServCost:*
7/3/2024	ANSWER FILED HEREIN BY DEFENDANT, HARTFORD FIRE INSURANCE COMPANY, THRU ATTY KAMIE T. DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; CERTIFICATE OF SERVICEANSWER (2 PAGES)	*Code:* JF *Deposit:* *Cost:*	$8.00	*ServType:* *ServCost:*
7/3/2024	ADDED DEPOSIT FROM KAMIE DOMINIC OF $25.00 ADD DEP FOR ANSWER	*Code:* DD *Deposit:* $25.00 *Cost:*		*ServType:* *ServCost:*
7/3/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $10.00	*Code:* PD *Deposit:* $10.00 *Cost:*		*ServType:* *ServCost:*

7/9/2024	SPOKE TO DEFT ATTY KAMIE DOMINIC AND SHE CONFIRMED SHE EMAIL THE ANSWER TO JOHN KING; THEREFORE, IT DID NOT NEED TO BE SERVED	*Code:*	NO	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
7/25/2024	AMENDING & SUPPLEMENTAL MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY DUSTAN J ABSHIRE & SIGNED BY JUDGE RONALD C. RICHARD ON 7/29/2024. CERT OF SERVICE. COVER LETTER FILED. CONF COPY TO ATTY ABSHIRE.CVR LTR/ORDER/COPY**CC MAILED TO PLTF; CC MAILED TO DEFT ATTY**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$15.00	*ServCost:*
7/25/2024	ADDED DEPOSIT FROM DUSTIN J. ABSHIRE OF $15.00 ADD DEP/ MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD	*Code:*	PD	*ServType:*
		Deposit:	$15.00	
		Cost:		*ServCost:*
7/30/2024	FAX FILED -PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*
8/2/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON ** UP FOR JUDGE REVIEW**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
8/13/2024	ORDER FOR PAUPER AFFIDAVIT SIGNED BY JUDGE RONALD C. RICHARD ON 8/13/2024 ** FROM THIS DATE PLTF WILL BE ALLOWED TO PROCEED IN PAUPER STATUS** NOTIFIED PLTF	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
10/31/2024	FAX FILED - MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*

10/31/2024	MOTION IN LIMINE TO EXCLUDE HEARSAY WITNESSES AND EVIDENCE (2 PAGES); ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION (2PGS)/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $24.00	*ServType:* *ServCost:*		
10/31/2024	MOTION TO STRIKE & MOTION FOR SANCTIONS; ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $22.00	*ServType:* *ServCost:*		
10/31/2024	ANSWER TO AMENDED PETITION FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE T DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059ANSWER/1CC	*Code:* JF *Deposit:* *Cost:* $11.00	*ServType:* *ServCost:*		
10/31/2024	NOTICE OF ANSWER TO AMENDED PETITION ISSUED TO (KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	
10/31/2024	ADDED DEPOSIT FROM RENEE E OR PATRICK S AMOS OF $350.00 ADD DEP FOR AMENDED ANSWER. MOTION IN LIMINE & MOTION TO STRIKE	*Code:* DD *Deposit:* $350.00 *Cost:*	*ServType:* *ServCost:*		
11/1/2024	FAX FILED - DEFENDANTS OPPOSITION TO PLAINTIFFS MOTION TO CONTINUE & MOTION TO QUASH (3 PAGES); ORDER FAX FILED HEREIN BY DEFTS THRU ATTY KAMIE DOMINIC. CERT OF SERVICE. COVER LETTER.FAX FILING	*Code:* CF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION IN LIMINE	*Code:* CIO *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	

11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION TO STRIKE & FOR SANCTIONS	*Code:* CIO	*ServType:* MF3		
		Deposit:			
		Cost: $10.00	*ServCost:* $30.00		
11/7/2024	FAX FILED - PLTFS MOTION TO RECONSIDER, MOTIONS TO INTERVENE LACK OF DUE PROCESS, MOTIONS TO DISMISS QUASH; ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	FAX FILED VIA EMAIL - MOTION TO STRIKE AND SEAL CERTAIN LANGUAGE FROM THE RECORD (2PAGES); ORDER; AFFIDAVIT FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	FAX FILED VIA EMAIL - NOTICE OF SUBP TO DEFT ATTY KAMIE T. DOMINIC FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	JUDGE RICHARD CALLED FOR AN INSTANT STATUS HEARING - PLTF APPEARS THRU ATTY OLIVER SCHRUMPF; DEFT APPEARS THRU ATTY KAMIE DOMINIC; 2-WIT SWORN; MOTION TO ENROLL AS COUNSEL OF RECORD FOR PLTF GRANTED & SIGNED; JUDGE RICHARD READ INTO THE RECORD ALL EMAIL PLEADINGS FROM PLTF & HIS SPOUSE RECEIVED 10/31/24 TO 11/7/2024; PLTFS MOTION TO CONTINUE TRIAL DENIED; COURT INFORMS DEFT ATTY THAT HER 10/31/24 MOTIONS FILED WOULD BE DENIED DUE TO UNTIMELINESS; COUNSEL K. DOMINIC WITHDRAWS MOTIONS & O. SCHRUMPF RENDERED HIS OPPOSITIONS MOOT; COURT ORDERED A REPORT BY DOCTOR CONFIRMING PLTF CANNOT TRAVEL. UPON RECEIPT JUDGE RICHARD WILL GRANT PLTF REQUEST TO APPEAR VIA ZOOM; MRS. KING & COUNSEL MUST APPEAR LIVE. (DR. REPORT DUE BY MONDAY, 11/11/2024). RCR	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $9.00	*ServCost:*		

11/7/2024	MOTION TO ENROLL AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY OLIVER JACKSON SCHRUMPF & SIGNED BY JUDGE RONALD C. RICHARD 11/7/2024. CERT OF SERVICE. CONF COPY TO PLTF ATTY.MOTION/CONF COPY	*Code:* JF *Deposit:* *Cost:* $9.00	*ServType:* *ServCost:*
11/7/2024	MOTION & ORDER TO CONTINUE NOV. 14, 2024 TRIAL FILED HEREIN BY PLTF THRU ATTY ***DENIED BY JUDGE RONALD C. RICHARD***	*Code:* JF *Deposit:* *Cost:* $6.00	*ServType:* *ServCost:*
11/8/2024	RECEIVED ORIGINAL MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. ATTACHED EXHIBITS (8 PAGES)MOTION (4 PAGES)/ORDER2 DOCSEXHIBITS (8 PAGES)	*Code:* JF *Deposit:* *Cost:* $46.00	*ServType:* *ServCost:*
11/12/2024	PRE-TRIAL BRIEF (4 PAGES) FILED VIA EMAIL BY PLTF THRU ATTY OLIVER SCHRUMPF.	*Code:* CF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*
11/14/2024	PLTF APPEARS W/ATTY OLIVER SCHRUMPF; DEFT APPEARS W/ATTY KAMIE DOMINIC; 5 WITS SWORN; 10 DOCS INTRO (34 PAGES); PLAINTIFF FAILED TO PROVE BY PREPONDERANCE OF EVIDENCE THAT AMOS DID ANYTHING INCORRECT IN PROCESSING THIS MATTER, MS. COLSTON'S TESTIMONY COULD HAVE SWAYED THE COURT BUT PLAINTIFF FAILED TO SUBPOENA HER; COSTS AWARDED TO PLAINTIFF; FORMAL JUDGMENT TO BE SIGNED UPON PRESENTATION; HEARING ON MOTION FOR CONTEMPT; COURT HOLDS JOHN KING IN DIRECT CONTEMPT OF COURT AND FINED $500.00. RCR	*Code:* JF *Deposit:* *Cost:* $85.00	*ServType:* *ServCost:*
11/14/2024	CONTEMPT OF COURT FINE ASSESSED TO PLTF, JOHN CLIFFORD KING IN THE AMOUNT OF $500.00	*Code:* CF *Deposit:* *Cost:* $500.00	*ServType:* *ServCost:*

ORig to 10/31/24 Fax Filing

11/15/2024	RULE TO SHOW CAUSE ORDER FOR SHUNTE KING TO APPEAR & SHOW CAUSE WHY SHE SHOULD NOT BE HELD IN CONTEMPT OF COURT, PURSUANT TO LSA - CCP ART 222 FILED HEREIN & SIGNED BY JUDGE RONALD C. RICHARD**RULE WILL BE SET UPON SERVICE INSTRUCTIONS OBTAINED**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
11/15/2024	EMAIL REQUEST FOR ESTIMATED COST OF TRIAL TRANSCRIPT BY PLTF ATTY OLIVER SCHRUMPF ** TESTIMONY APPROXIMATELY 2 HOURS / REGULAR (WITHIN 30 DAYS) 150 PAGES X $4.75/PAGE = $712.50 / RUSH (WITHIN 10 DAYS) 150 PAGES X $5.50/PAGE = $825.00** PROVIDED TO MR. SCHRUMPF VIA EMAIL	*Code:*	NO	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - PLTFS MOTION TO RECONSIDER, MOTIONS TO INTERVENE LACK OF DUE PROCESS, MOTIONS TO DISMISS QUASH; ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF.DOCS/6	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$36.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - MOTION TO STRIKE AND SEAL CERTAIN LANGUAGE FROM THE RECORD (2PAGES); ORDER; AFFIDAVIT FILED HEREIN BY PLTF.DOCS/3EXH (14 PAGES)	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$46.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL EXHIBIT 1FILED HEREIN BY PLTF.EXH 15 PAGES	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$30.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - NOTICE OF SUBP TO DEFT ATTY KAMIE T. DOMINIC FILED HEREIN BY PLTF.	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
11/19/2024	RULE: TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KINGDATE: WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM	*Code:*	RU	*ServType:*
		Deposit:		
		Cost:	$4.00	*ServCost:*

Orig. to 11-7-2024 Fax Filing

Orig. to 11-7-2024 Fax Filing

Orig. to 11-7-2024 Fax Filing

11/19/2024	CITATION ORDER ISSUED (SHUNTE KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601 OR 1648 PAVILLION DR., IOWA, LA 70647)CONTEMPT OF COURTSENT TO CALCASIEU PARISH SHERIFF	*Code:* CIO *Deposit:* *Cost:* $10.00	*ServType:* *ServCost:*
11/19/2024	HEARING NOTICE FOR RULE TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KING SET FOR WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM MAILED TO ATTORNEY OLIVER JACKSON SCHRUMPF	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/19/2024	HEARING NOTICE FOR RULE TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KING SET FOR WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM MAILED TO ATTORNEY KAMIE T. DOMINIC	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/20/2024	LETTER REQUEST FOR COPY OF TRIAL TRANSCRIPT (REGULAR - WITHIN 30 DAYS) FILED HEREIN BY PLTF THRU ATTY OLIVER SCHRUMPF.	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/20/2024	ADDED DEPOSIT FROM CK/SCHRUMPF LAW OFFICE FOR TRIAL TRANSCRIPT OF $712.50 Deposit goes toward Transcript	*Code:* PD *Deposit:* $712.50 *Cost:*	*ServType:* *ServCost:*
11/21/2024	JUDGMENT READ & SIGNED BY JUDGE RONALD C. RICHARD **IN FAVOR OF DEFT, RENEE AMOS & AGA PLTF, JOHN CLIFFORD J KING, DISMISSING WITH PREJUDICE, ALL COSTS ASSESSED TO PLTF, JOHN CLIFFORD J KING** CC TO PLTF ATTY SCHRUMPF; CC TO DEFT ATTY DOMINIC.ORDER/2CC	*Code:* JU *Deposit:* *Cost:* $16.00	*ServType:* *ServCost:*
11/21/2024	NOTICE OF JUDGMENT MAILED TO (JOHN CLIFFORD J KING THRU ATTY OLIVER JACKSON SCHRUMPF @ 3801 MAPLEWOOD DR., SULPHUR, LA 70663)	*Code:* NJ *Deposit:* *Cost:* $10.00	*ServType:* *ServCost:*

11/21/2024	NOTICE OF JUDGMENT MAILED TO (RENEE AMOS THRU ATTY KAMIE T. DOMINIC @ 1400 RYAN ST., LAKE CHARLES, LA 70601)	*Code:*	NJ	*ServType:*	
		Deposit:			
		Cost:	$10.00	*ServCost:*	
11/21/2024	CLERK CERTIFICATE CERTIFYING NOTICE OF JUDGMENT MAILED TO PLTF THRU ATTY OLIVER JACKSON SCHRUMPF AND TO DEFT, RENEE AMOS THRU ATTY KAMIE T. DOMINIC. COPY TO PLTF ATTY; COPY TO DEFT ATTY.	*Code:*	NO	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

JOHN CLIFFORD J KING	**:**	**LAKE CHARLES CITY COURT**
VS. NO. 23-2124	**:**	**PARISH OF CALCASIEU**
RENEE AMOS **NOTARY PUBLIC** **NOTARY ID #29374**	**:**	**STATE OF LOUISIANA**
FILED: _____	**:**	**_____** **DEPUTY CLERK**

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

To: John King
123 N. Louisiana Avenue
Lake Charles, LA 70601

NOW COMES, RENEE AMOS who requests that JOHN KING answer under oath, in accordance with the provisions of Articles 1457 through 1459 of the Louisiana Code of Civil Procedure, the Interrogatories, Request for Production of Documents, and Request for Admissions set forth below. In responding to these Interrogatories and Request, RENEE AMOS requests that you furnish all information as is available to you, and answer each Interrogatory and Request separately, fully, in writing and under oath, unless it is objected to, in which event the reasons for the objections shall be stated in lieu of the answer. The answers are to be signed by the person making them. These Interrogatories and Requests are to be as continuing, and if your answer to any Interrogatory and Request materially changes after the time the answers are filed, you are requested to supplement your answers to reflect same. Please take notice that a copy of the answers must be served upon the attorney for RENEE AMOS within fifteen (15) days after the service of these Interrogatories, Request for Production of Documents, and Request for Admissions.

INTERROGATORIES

INTERROGATORY NO. 1:

State your name, residential address in Lake Charles, Louisiana, during September 2021, when the vehicle title in question was signed.

A. John King Sr
123 N. Louisiana Avenue
Lake Charles, LA 70601

INTERROGATORY NO. 2:

Please specify your work address in New Jersey during September 2021 and provide the names and contact information of any supervisors, colleagues, or coworkers who can verify your presence at work in New Jersey.

Work: Various sites between NJ, PA, and NY

1. Vincent Lau - Princeton NJ
2. Justin Lewis- New York, NY
3. Jason DeJesus- Jersey City, NJ
4. Romeo Delacruz - Hillside, NJ
5. Chris Keaton, Calcasieu Parish, La
6. Chanel Alexander, New York,NY

7. Bill Waterson - Edison, New Jersey
8. Charlie Thomas - Pittsburgh, PA
9. Shane Jenson - Little Rock, Arkansas
10. Shunte King, Claremont, California
11. Chad Plummer, Harrison NJ

INTERROGATORY NO. 3:

Please describe your typical work schedule during September 202, including regular work hours, days off, and any periods of leave or absence.

-Which year is counsel referring to and work at which Job?

INTERROGATORY NO. 4:

Please explain how you became aware of the signing of the vehicle title and whether you received any communication about it while residing in Lake Charles or working in New Jersey.

- became aware that a vehicle title and bill of sale were notarized by Renee Amos once the official investigative report was released November 2022 prior to that I was told by detective castille that names of ppl being investigation could not be released until after investigation.
- I have never met Renee Amos nor has Renee Amos provided any communication nor anyone else about the "signing of the vehicle title". I have never been a resident of New Jersey.

INTERROGATORY NO. 5:

Please provide all email correspondence and written communication exchanged between yourself and both the Calcasieu Parish Sheriff's Office and the Calcasieu Parish District Attorney's Office.

- **all official correspondence must be stamped by the investigative unit and must be obtained by official request. Additionally this question is too broad does not specify case #, dates or time period, I do not have access to all correspondence on the matter Defendants Attorney can request case file of the specific investigation by case number but I cannot answer this question because I do not see all correspondence between DA and Sheriff office and I also dont know the dates and cases. To find all correspondence since age 18 until now is cumbersome.**

INTERROGATORY NO. 6:

State whether you granted anyone power of attorney or delegated authority to sign the vehicle title on your behalf during September 2021.

- **I did not as it would not have been possible. I have a signed affidavit of non marriage from June 2021 notarized that specifically states that noone has been given that power to date. Please specify durable power of attorney or power of attorney. I have not delegated any authority to transfer any assets with a lien against them its impossible.**
-

INTERROGATORY NO. 7:

Please provide information about any travels you made during September 2021, including trips between Lake Charles, Louisiana, and New Jersey.

I John King Sr did not travel at all physically to the state of Louisiana September 2021. At no time was my physical presence in the state of Louisiana.

INTERROGATORY NO. 8:

Please provide any witnesses who can attest to your presence or absence in Louisiana during the time when the vehicle title was signed. Please provide their names and contact information.

1. John King Jr- Calcasieu Parish,LA
2. Jayla E. King- Calcasieu Parish, LA
3. Justin King - Calcasieu Parish, LA
4. Monica King - Calcasieu Parish, LA
5. James King Sr - Calcasieu Parish, LA

6. Jade King - Calcasieu Parish, LA
7. Shunte King - Claremont, California
8. Faye Guillory- Calcasieu Parish, LA
9. Essex County Sheriffs Department - Ironbound, NJ
10. Woodbridge Suites security cameras and staff Plainfield, NJ
11. Vincent Lau - Princeton NJ
12. Justin Lewis- New York, NY
13. Jason DeJesus- Jersey City, NJ
14. Romeo Delacruz - Hillside, NJ
15. Chris Keaton, Calcasieu Parish, La
16. Chanel Alexander, New York,NY
17. Bill Waterson - Edison, New Jersey
18. Charlie Thomas - Pittsburgh, PA
19. Shane Jenson - Little Rock, Arkansas
20. Shunte King, Claremont, California
21. Chad Plummer, Harrison NJ
22. Dr. Todd Stitik, West Caldwell NJ
23. Dr Jeevan Patel, Belleville NJ
24. GPS Tracking Drone Vehicle
25. Toll Road Agent Pike 24
26. NJ Transit ticketholder scanned verification
27. Edison Park Fast Electronic Parking System
28. Google GPS 24/7 detections
29. Fitbit Monitor and Breathng Machine Monitor Sleep Apnea GPS location
30. Electronic Card scans that show my entrance and exit times at Woodbridge Suites
31. Park Whiz electronic stamp and verification
32. Dept Homeland Security - TSA Interview for Global Entry - Newark NJ Field Office

INTERROGATORY NO. 9:

Please state how long you have resided in New Jersey and whether you are a resident of the state.

I am a permanent resident of Louisiana address 123 N. Louisiana Avenue Lake Charles, LA. Contract and transient workers, and full time students are not considered for state residency.

INTERROGATORY NO. 10:

Please list, specifically and categorically, any and all documents or other tangible evidence that you may introduce at the trial of this matter.

- **please be specific the questions is burdensome please refer to a specific case number or investigation number other than what can be obtained from Calcasieu Parish Sheriff Department**

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1:

Please produce copies of your paystubs for the last six (6) months

- not available

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2:

Please produce copies of your W2s and your Federal and State income tax returns for the last three (3) years.

- **not available, relevance to this case? Has Amos provided these?**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3:

Please provide each and every item of documentary evidence that you may use at the trial hereto, including documents, reports, papers, statements, photos, diagrams, maps, video tapes, audio tapes, or any other evidence and state who originated each item of documentary evidence and whose possession it is presently in. **This Request for Production is intended to be all inclusive and continuing and at any time it is determined that any item of documentary evidence may use at trial you are required to supplement your answers. Notice is given that any item of documentary evidence not disclosed will be objected to at trial.**

- **Please be specific as this is burdensome and I cannot control what is available through District Attorney office or when it becomes available as it must be requested in writing and paid for**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4:

Please produce any and all copies of documents listed in your Response to Interrogatory No. 2.

- Question makes no sense, documents other than names listed

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5:

Please produce any and all copies of documents that support your Response to Interrogatory No. 3

- Question was incomplete does not specify a year therefore impossible to answer

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6:

Please produce any and all copies of documents that support your Response to Interrogatory No. 5.

Counsel must request their own copy of official stamped documents from the Calcasieu Sheriff Department there is a form that must be filled out and a fee assessed. I dont know the case #, timeframe or specifics. Better to request directly from them.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 7:

Please produce any and all copies of documents that support your Response to Interrogatory No. 6.

- **not available**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 8:

Please produce any and all copies of documents that support your Response to Interrogatory No. 7.

- **please be specific as to travels because of public transportation system this can be burdensome to keep up with daily subway, and train commute detail for every movement. Travels via plane, automobile, etc please be specifi**c

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 9:

Please produce any and all copies of documents that support your Response to Interrogatory No. 8.

- **Please clarify the question and provide examples of what types of documents could pertain to the answers provided**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 10:

Please produce any and all copies of documents that support your Response to Interrogatory No. 9.

- **This is provided in my initial petition written August 2023**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 11:

Please produce any and all copies of documents that support your Response to Interrogatory No. 10.

-please be specific the questions is burdensome please refer to a specific case number or investigation number other than what can be obtained from Calcasieu Parish Sheriff Department

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 12:

Please produce a copy of any and all documents you contend supports or refutes any claim, defense, or allegation made in this Action by any party to this Action, or that you otherwise believe relates to the subject matter of this Action, that you have not already produced in response to any other request.

- **Documentation supplied to Calcasieu Parish Sheriff Dept can be obtained by official request for the investigation and file**

Respectfully submitted,

_____

KAMIE T. DOMINIC, B. R. #40184
Law Office of Kamie T. Dominic LLC.
1400 Ryan Street
Lake Charles, LA 70601
Phone: 337-393-7059
Fax: 337-426-8763
Email: kamiedominiclaw@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served on Plaintiff, John King, via facsimile and/or electronic transmission and/or by United States mail, properly addressed and postage prepaid on this _____ day of _____, 2024.

_____

KAMIE T. DOMINIC

The Judiciary Commission of Louisiana

Office of Special Counsel

December 3, 2025

Mrs. Shonte Jones King
[23] N. Louisiana Ave.
Lake Charles, LA 70[6]

Re: Our File No. 25-[6]06

Dear Mrs. King:

We received your complaint on November 18, 2025. In your complaint you mentioned enclosing attachments. There were no attachments to your complaint. Please send those to my attention so that the attorney can review your complaint.

Sincerely,

Christine Mills

Christine Mills

The Judiciary Commission of Louisiana

Office of Special Counsel

December 3, 2025

Mrs. Shonte Jones King
[23] N. Louisiana Ave.
Lake Charles, LA 70[6]

Re: Our File No. 25-[6]06

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Sincerely,

Christine Mills

Christine Mills

Suit No.: 23-2124

JOHN CLIFFORD J KING

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Deft. Dep. #764.00

Third party Deposit $2900
Third party Cost $2900

Cost Summary	
Deposits:	$2,505.50
Court Cost:	($2,215.70)
Refund:	$0.00
Balance:	$289.80

Plaintiff Deposits (not including Transcript Deposit) → : $1000.00

Cost to date: $2186.70

Date	*Minutes*			
8/24/2023	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS.	*Code:*	AC	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
8/24/2023	DEFAULT COURT COST	*Code:*	DCC	*ServType:*
		Deposit:		
		Cost:	$56.50	*ServCost:*
8/24/2023	CLAIM: DAMAGESAS PER FAX FILED PETITION (6PAGES); C/SUPPLEMENTAL REPORT(2); CPSO OFFENSE REPORT(4); CPSO CASE REPORT(4) C/WELD INSPECTION(7); C/SOUTHWEST CREDIT UNION DOCS(2); C/CAPITAL ONE(7); C/REGISTRATION(1); C/VEHICLE APPLICATION(1); CASE REPORT SUMMARY(1); C/CERTIFICATE OF TITLE(2); C/LICENSE(1); C/CASE SUMMARY(1) FILED HEREINPETITION (6PAGES) 1/CC 1/CONFEXHIBITS(33)FAX FILING FEE $5.00	*Code:*	CL	*ServType:*
		Deposit:		
		Cost:	$95.00	*ServCost:*

9/1/2023	CITATION ISSUED (RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 AT 1208 17TH STREET LAKE CHARLES LA, 70601)	*Code:*	CII	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
9/5/2023	ADDED DEPOSIT FROM JOHN KING OF $255.00 ADV DEP	*Code:*	PD	*ServType:*	
		Deposit:	$255.00		
		Cost:		*ServCost:*	
9/5/2023	2 COPIES OF THE PETITION 1 FOR SERVICE, 1 FOR PLT12 PAGES @ $2.00	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$24.00	*ServCost:*	
9/12/2023	DEFENDANT RENEE AMOS PEREMPTORY EXCEPTIONS OF PRESCRIPTION, RULE TO SHOW CAUSE, C/JUDGMENT OF DISMISSAL WITH PREJUDICE, C/CPSO SUPPLEMENTAL NARRATIVE /INITIAL REPORT, C/CPSO OFFENSE REPORT RECEIPT, AND C/CASE REPORT FILED HEREIN.**ORDER SIGNED BY JUDGE JAMIE B. BICE 9/13/2023**EXCEPTIONRULE1 AT $6 EACH9 AT $2 EACH1 CONFORMED COPY TO ATTY DOMINIC1 CC TO BE SERVED TO PLTF	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$44.00	*ServCost:*	
9/12/2023	ADDED DEPOSIT FROM KAMIE DOMINIC OF $150.00 ADD DEP FOR EXCEPTION	*Code:*	DD	*ServType:*	
		Deposit:	$150.00		
		Cost:		*ServCost:*	
9/20/2023	HEARING NOTICE OF EXCEPTION RULE SET FOR WEDNESDAY 11/15/2023 AT 9:00 AM MAILED TO DEFT ATTY., KAMIE T. DOMINIC	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

9/20/2023	RULE: EXCEPTION DATE: WEDNESDAY 11/15/2023 AT 9:00 AM	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	
9/20/2023	CITATION ORDER ISSUED TO: (KING, JOHN CLIFFORD J AT 123 N. LOUISIANA AVENUE LAKE CHARLES LA 70601) EXCEPTION	*Code:*	CIO	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
11/7/2023	FAX FILED MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/08/23.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
11/13/2023	RECEIVED ORIGINAL MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/16/23.MOTION/2CCDOCS/2EXHIBITS/6COPIES/18	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$76.00	*ServCost:*	
11/13/2023	CC / JOHN KINGADD DEP / FOR MOTIONS TO CONTINUE AND QUASH	*Code:*	PD	*ServType:*	
		Deposit:	$255.00		
		Cost:		*ServCost:*	
11/28/2023	HEARING NOTICE FOR EXCEPTION SET FOR WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM MAILED TO DEFENDANT, RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC.	*Code:*	NO	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
11/28/2023	NOTICE OF MOTION FOR CONTINUANCE AND MOTION TO QUASH ISSUED TO: RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC AT 1400 RYAN ST., LAKE CHARLES, LA 70601	*Code:*	JF	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00

11/28/2023	RULE REFIXED: EXCEPTIONDATE: WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	
11/28/2023	CITATION ORDER ISSUED TO WITH C/MOTION FOR CONTINUANCE AND MOTION TO QUASH: JOHN CLIFFORD J KING AT 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601	*Code:*	CIO	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
1/4/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
1/5/2024	CC / JOHN KINGADD DEP / FOR FAX FILING FEE AND SUBPOENA	*Code:*	PD	*ServType:*	
		Deposit:	$55.00		
		Cost:		*ServCost:*	
1/5/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	*Code:*	SUB	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
1/16/2024	FAX FILED - MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
1/17/2024	RULE: EXCEPTION (RE-FIXED)DATE: THURSDAY, JANUARY 25, 2024 @ 9:00 AM**2 NOTICES MAILED**	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	

1/17/2024	PLTF FAILS TO APPEAR; DEFT APPEARS W/ATTY; MOTION TO CONTINUE GRANTED; CONTINUED UNTIL 1/25/2024 @ 9:00 AM; NOTICE TO BE SENT TO BOTH PARTIES. RCR	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
1/17/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $0.00	*ServCost:*		
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $0.00	*ServCost:*		
1/17/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	*Code:* SUB	*ServType:* MF3		
		Deposit:			
		Cost: $10.00	*ServCost:*	$30.00	
1/19/2024	REQUEST FOR A COPY OF THE EXCEPTIONS FILED HEREIN BY DEF ATTY KAMIE T DOMINIC	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $6.00	*ServCost:*		
1/19/2024	1 COPY OF DEFENDANT PEREMPTORY EXECEPTIONS OF PRESCRIPTION4 PAGES @ $2.00	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $8.00	*ServCost:*		

1/19/2024	ADDED DEPOSIT FROM KAMIE T. DONINIC OF $14.00 ADD DEP/CF OF PEREMPTORY EXECEPTIONS	*Code:* DD *Deposit:* $14.00 *Cost:*		*ServType:* *ServCost:*
1/22/2024	RECEIVED ORIGINAL LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.REQUESTDOC/1EXHIBIT/1	*Code:* JF *Deposit:* *Cost:*	$14.00	*ServType:* *ServCost:*
1/22/2024	ADDED DEPOSIT FROM JOHN KING OF $80.00 /SUBPOENA	*Code:* PD *Deposit:* $80.00 *Cost:*		*ServType:* *ServCost:*
1/23/2024	RECEIVED ORIGINAL MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE. **SIGNED BY JUDGE ** EXHIBIT ATTACHED (3 PAGES)MOTION/ORDEREXH - 3 PAGES	*Code:* JF *Deposit:* *Cost:*	$18.00	*ServType:* *ServCost:*
1/23/2024	LETTER TO CONTEST COURT FEES FOR JANUARY 17, 2024 FILED HEREIN BY PLTF **BUT NOT SIGNED**	*Code:* JF *Deposit:* *Cost:*	$6.00	*ServType:* *ServCost:*
1/24/2024	FAXED LETTER FILED HEREIN BY ATTY ORELIA R. LAWDINS-TRENT INFORMING THE COURT OF THE RECEIVED SERVICE OF A SUBP (ISSUED AT PLTF REQUEST) FOR CHARMAINE Y. COLSTON, AS THEY DO NOT REPRESENT MS. COLSTON IN THIS MATTER & SHE IS NOT A PARTY TO THIS PROCEEDING; SINCE OFFICE IMPROPERLY SERVED, HAS NOT FORWARDED TO MS. COLSTON; ADDITIONALLY CANNOT ASSUME ANY RESPONSIBILITY FOR HER APPEARANCE OR REQUIRE HER PRESENCE AT ANY HEARINGS IN THIS MATTER	*Code:* JF *Deposit:* *Cost:*	$6.00	*ServType:* *ServCost:*

1/25/2024	PLTF APPEARS THRU ATTY, DUSTAN ABSHIRE; DEFT APPEARS WITH ATTY, KAMIE DOMINIC; PRE-TRIAL CONFERENCE HELD; DUSTAN ABSHIRE APPEARS TODAY FOR THE LIMITED PURPOSE OF THIS EXCEPTION HEARING; ARGUMENT AND INFORMATION GIVEN; EXCEPTION REQUEST IS OVERRULED; OBJECTION TO RULING NOTED FOR THE RECORD; MATTER SET FOR TRIAL ON THURSDAY, MARCH 21, 2024 AT 9:00 AM; NOTICE GIVEN IN OPEN COURT AND TO BE MAILED. RCR	*Code:* JF *Deposit:* *Cost:* $7.00	*ServType:* *ServCost:*
2/7/2024	NOTICE OF ANSWER FILED HEREIN BY DEFENDANT RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 ISSUED TO PLTF JOHN KING, 123 N LOUISIANA AVENUE, LAKE CHARLES, LA 70601	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:* $30.00
2/7/2024	ANSWER FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; FAX: 337-426-8763; *CERTIFICATE OF SERVICE*ANSWER (2 PAGES)/1CC	*Code:* JF *Deposit:* *Cost:* $13.00	*ServType:* *ServCost:*
2/8/2024	ADDED DEPOSIT FROM KAMIE DOMINIC FOR ANSWER OF $25.00	*Code:* DD *Deposit:* $25.00 *Cost:*	*ServType:* *ServCost:*
2/23/2024	REQUEST FOR CERTIFIED COPIES RECEIVED BY CHARMAINE COLSTON. **NOTIFIED COST FOR CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00 PLUS REQ. $6.00 TOTAL AMT. REQUIRED - $29.00**	*Code:* NO *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
2/27/2024	REQUEST FOR CERTIFIED COPIES FILED HEREIN BY CHARMAINE COLSTON.	*Code:* JF *Deposit:* *Cost:* $6.00	*ServType:* *ServCost:*

Backed out this cost

2/27/2024	CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$23.00	*ServCost:*
2/27/2024	ADDED DEPOSIT FROM CREDIT CARD/CHARMAINE COLSTON FOR CERTIFIED COPIES OF $29.00	*Code:*	TPD	*ServType:*
		Deposit:	$29.00	
		Cost:		*ServCost:*
3/7/2024	TRIAL FIXED FOR THURSDAY, MARCH 21, 2024 @ 9:00 AM; 2 NOTICES MAILED.	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$8.00	*ServCost:*
3/7/2024	FAX FILED - REQUEST FOR SUBPOENA W/ATTACHED WITNESS SUBP. ACKNOWLEDGEMENT FORM FILED HEREIN BY PLTF IN PROPER PERSON. **REQUEST TO SERVE ATTY ORELIA LAWDINS-TRENT C/O HER CLIENT CHARMAINE COLSTON, LAWDINS GALLIEN FIRM, 1504 MARTIN LUTHER KING HWY STE A, LAKE CHARLES, LA 70601**FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*
		Deposit:		
		Cost:	$7.36	*ServCost:*
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*
		Deposit:		
		Cost:	$7.36	*ServCost:*

Backed out this cost

Do not give credit for this Deposit

3/11/2024	**PER JUDGE RICHARD - DISREGARD PLTFS REQUEST FOR SUBP TO BE SERVED TO ATTY ORELIA LAWDINS TRENT C/O HER CLIENT CHARMAINE Y. COLSTON - REFER TO ATTY ORELIA LAWDINS-TRENTS LETTER FILED INTO THE RECORD ON 1/24/2024 WHEREIN SHE ADVISED THE COURT SHE IS NOT THE ATTY OF RECORD FOR MS. COLSTON, AS SHE IS NOT A PARTY IN THIS MATTER**	*Code:* NO *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*	
3/19/2024	MOTION TO CONTINUE (2 PAGES); ORDER TO REFIX TRIAL FILED HEREIN BY DEFT THRU ATTY KAMIE T. DOMINIC **PLTF OPPOSES**MOTION (2 PAGES)/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $24.00	*ServType:* *ServCost:*		
3/19/2024	ADDED DEPOSIT FROM KAMIE TRAMAIN DOMINIC OF $100.00	*Code:* DD *Deposit:* $100.00 *Cost:*	*ServType:* *ServCost:*		
3/21/2024	TRIAL RE-FIXED DATE: WEDNESDAY, MAY 8, 2024 AT 9:00**NOTICE GIVEN IN OPEN COURT***	*Code:* JF *Deposit:* *Cost:* $8.00	*ServType:* *ServCost:*		
3/21/2024	PLTF APPEARS W/ATTY DUSTAN ABSHIRE; DEFT APPEARS W/ATTYS KAMIE DOMINIC & ED BAUMAN; FTR, OBJECTION TO THE MOTION TO CONTINUE BY PLTF ATTY DUSTAN ABSHIRE, REQUEST DENIED; MOTION TO CONTINUE BY DEFT ATTY KAMIE DOMINIC GRANTED & SIGNED IN OPEN COURT; TRIAL SET FOR WEDNESDAY, MAY 8, 2024 AT 9:00 AM; PLTF ATTY REQUESTS ZOOM COURT FOR MR. KING, REQUEST DENIED; NOTICE GIVEN TO ALL PARTIES IN OPEN COURT. RCR	*Code:* JF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
3/25/2024	NOTICE OF MOTION & ORDER TO CONTINUE & REFIX TRIAL ISSUED TO: (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	

4/25/2024	MOTION TO RECONSIDER DEFENDANT RENEE AMOS PEREMPTORY EXCEPTION OF PRESCRIPTION; MEMORANDUM IN SUPPORT OF MOTION TO RECONSIDER DEFT PEREMPTORY EXCEPTION (3 PAGES); EXH A (2 PAGES) FILED HEREIN BY DEFT THRU ATTY KAMIE DOMINIC.MOTION/MEMO (3 PAGES)/CC1 EXH (2 PAGES)	*Code:* JF *Deposit:* *Cost:* $25.00	*ServType:* *ServCost:*		
4/25/2024	NOTICE OF MOTION TO RECONSIDER DEFENDANTS PEREMPTORY EXCEPTION OF PRESCRIPTION ISSUED TO (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	
4/25/2024	ADDED DEPOSIT FROM CREDIT CARD/KAMIE TRAMAIN DOMINIC FOR MOTION TO RECONSIDER DEFT EXCEPTION OF $100.00	*Code:* DD *Deposit:* $100.00 *Cost:*	*ServType:* *ServCost:*		
5/8/2024	PLTF APPEARS W/ATTY JOHN CLIFFORD J. KING; DEFT APPEARS W/ATY KAMIE DOMINIC; COURT GRANTS PLAINTIFF'S ORAL MOTION TO RESET HEARING AND TO AMEND PLEADINGS TO INCLUDE HARTFORD LIFE INSURANCE COMPANY; MATTER RE-FIXED UNTIL THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; NOTICES TO BE SENT TO ALL PARTIES. RCR	*Code:* JF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
5/15/2024	TRIAL RE-FIXED FOR THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; 2 NOTICES MAILED.	*Code:* JF *Deposit:* *Cost:* $8.00	*ServType:* *ServCost:*		
5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY DUSTAN J. ABSHIRE, 334 KIRBY ST. LAKE CHARLES, LA 70601	*Code:* PC *Deposit:* *Cost:* $5.04	*ServType:* *ServCost:*		

5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*	
		Deposit:			
		Cost:	$5.04	*ServCost:*	
5/20/2024	FAX FILED - PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTFFAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
5/30/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $5.00	*Code:*	PD	*ServType:*	
		Deposit:	$5.00		
		Cost:		*ServCost:*	
5/31/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTF **UP FOR REVIEW ** DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD**	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
6/4/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD. CC TO PLTF ATTY DUSTAN ABSHIRE.	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$11.00	*ServCost:*	
6/13/2024	SUPPLEMENTING PETITION (2 PAGES); ORDER; AFFIDAVIT AND COVER LETTER FILED HEREINPETITION (2 PAGES)/3CCDOCS/3	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$41.00	*ServCost:*	
6/13/2024	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS. **AMENDING PARAGRAPH 2 AND ADD DEFENDANT HARTFORD FIRE INSURANCE COMPANY**	*Code:*	AC	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

6/13/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM OF $300.00 ADD DEP FOR SUPPLEMENTAL PETITION	*Code:* PD		*ServType:*	
		Deposit: $300.00			
		Cost:		*ServCost:*	
6/14/2024	CHECK REQUEST ID# 21090 FOR PREPAYMENT SERVICE FEE SUBMITTED TO COMPTROLLER	*Code:* NO		*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (RENEE AMOS THRU ATTY: KAMIE T. DOMINIC AT 1400 RYAN ST. LAKE CHARLES LA, 70601)	*Code:* CII		*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (HARTFORD FIRE INSURANCE COMPANY THRU: LOUISIANA SECRETARY OF STATE AT 8585 ARCHIVES AVE BATON ROUGE LA, 70809)**MAILED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE** CK. NO. 038877 ISSUED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE	*Code:* CII		*ServType:*	SF
		Deposit:			
		Cost:	$10.00	*ServCost:*	$40.40
6/17/2024	PREPAYMENT OF SERVICE FEE. CHECK #038725 PAID TO: SECRETARY OF STATES OFFICE	*Code:* SF		*ServType:*	
		Deposit:			
		Cost:	$50.00	*ServCost:*	
6/18/2024	MOTION AND ORDER TO WITHDRAW DUSTAN J. ABSHIRE AS COUNSEL OF RECORD FOR PLTF, JOHN CLIFFORD J KING; ORDER SIGNED BY JUDGE RONALD C. RICHARD ON 6/20/2024; COPY OF LETTER W/EMAIL FILED HEREIN BY ATTY DUSTAN J. ABSHIRE. CERT OF SERVICE. COVER LETTER FILED. COPY TO ATTY ABSHIRE. COPY TO PLTF.CVR LTR/MOTION/ORDER/COPY2 EXH	*Code:* JF		*ServType:*	
		Deposit:			
		Cost:	$25.00	*ServCost:*	

6/20/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM, LLC OF $25.00 ADD DEP MOTION& ORDER TO WITHDRAW AS COUNSEL OF RECORD	*Code:* PD *Deposit:* $25.00 *Cost:*		*ServType:* *ServCost:*
6/21/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO PLTF, JOHN CLIFFORD J KING @ 123 N LOUISIANA AVE, LAKE CHARLES, LA 70601	*Code:* NO *Deposit:* *Cost:*	$0.00	*ServType:* *ServCost:*
6/24/2024	COPY OF PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.**THE ORIGINAL THAT WAS FILED 5/31/2024 ATTACHED TO THIS COPY FOR JUDGE RICHARDS REVIEW** DENIED DUE TO NO 3RD PARTY AFFIANT PROVIDED**	*Code:* JF *Deposit:* *Cost:*	$0.00	*ServType:* *ServCost:*
6/27/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF HAS FAILED TO PROVIDE A THIRD PARTY AFFIANT. CC TO PLTF.ORDER/CC	*Code:* JF *Deposit:* *Cost:*	$11.00	*ServType:* *ServCost:*
7/3/2024	ANSWER FILED HEREIN BY DEFENDANT, HARTFORD FIRE INSURANCE COMPANY, THRU ATTY KAMIE T. DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; CERTIFICATE OF SERVICEANSWER (2 PAGES)	*Code:* JF *Deposit:* *Cost:*	$8.00	*ServType:* *ServCost:*
7/3/2024	ADDED DEPOSIT FROM KAMIE DOMINIC OF $25.00 ADD DEP FOR ANSWER	*Code:* DD *Deposit:* $25.00 *Cost:*		*ServType:* *ServCost:*
7/3/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $10.00	*Code:* PD *Deposit:* $10.00 *Cost:*		*ServType:* *ServCost:*

7/9/2024	SPOKE TO DEFT ATTY KAMIE DOMINIC AND SHE CONFIRMED SHE EMAIL THE ANSWER TO JOHN KING; THEREFORE, IT DID NOT NEED TO BE SERVED	*Code:*	NO	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
7/25/2024	AMENDING & SUPPLEMENTAL MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY DUSTAN J ABSHIRE & SIGNED BY JUDGE RONALD C. RICHARD ON 7/29/2024. CERT OF SERVICE. COVER LETTER FILED. CONF COPY TO ATTY ABSHIRE.CVR LTR/ORDER/COPY**CC MAILED TO PLTF; CC MAILED TO DEFT ATTY**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$15.00	*ServCost:*
7/25/2024	ADDED DEPOSIT FROM DUSTIN J. ABSHIRE OF $15.00 ADD DEP/ MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD	*Code:*	PD	*ServType:*
		Deposit:	$15.00	
		Cost:		*ServCost:*
7/30/2024	FAX FILED -PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*
8/2/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON ** UP FOR JUDGE REVIEW**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
8/13/2024	ORDER FOR PAUPER AFFIDAVIT SIGNED BY JUDGE RONALD C. RICHARD ON 8/13/2024 ** FROM THIS DATE PLTF WILL BE ALLOWED TO PROCEED IN PAUPER STATUS** NOTIFIED PLTF	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
10/31/2024	FAX FILED - MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*

10/31/2024	MOTION IN LIMINE TO EXCLUDE HEARSAY WITNESSES AND EVIDENCE (2 PAGES); ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION (2PGS)/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $24.00	*ServType:* *ServCost:*		
10/31/2024	MOTION TO STRIKE & MOTION FOR SANCTIONS; ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $22.00	*ServType:* *ServCost:*		
10/31/2024	ANSWER TO AMENDED PETITION FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE T DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059ANSWER/1CC	*Code:* JF *Deposit:* *Cost:* $11.00	*ServType:* *ServCost:*		
10/31/2024	NOTICE OF ANSWER TO AMENDED PETITION ISSUED TO (KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	
10/31/2024	ADDED DEPOSIT FROM RENEE E OR PATRICK S AMOS OF $350.00 ADD DEP FOR AMENDED ANSWER. MOTION IN LIMINE & MOTION TO STRIKE	*Code:* DD *Deposit:* $350.00 *Cost:*	*ServType:* *ServCost:*		
11/1/2024	FAX FILED - DEFENDANTS OPPOSITION TO PLAINTIFFS MOTION TO CONTINUE & MOTION TO QUASH (3 PAGES); ORDER FAX FILED HEREIN BY DEFTS THRU ATTY KAMIE DOMINIC. CERT OF SERVICE. COVER LETTER.FAX FILING	*Code:* CF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION IN LIMINE	*Code:* CIO *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	

11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION TO STRIKE & FOR SANCTIONS	*Code:* CIO	*ServType:* MF3		
		Deposit:			
		Cost: $10.00	*ServCost:* $30.00		
11/7/2024	FAX FILED - PLTFS MOTION TO RECONSIDER, MOTIONS TO INTERVENE LACK OF DUE PROCESS, MOTIONS TO DISMISS QUASH; ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	FAX FILED VIA EMAIL - MOTION TO STRIKE AND SEAL CERTAIN LANGUAGE FROM THE RECORD (2PAGES); ORDER; AFFIDAVIT FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	FAX FILED VIA EMAIL - NOTICE OF SUBP TO DEFT ATTY KAMIE T. DOMINIC FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	JUDGE RICHARD CALLED FOR AN INSTANT STATUS HEARING - PLTF APPEARS THRU ATTY OLIVER SCHRUMPF; DEFT APPEARS THRU ATTY KAMIE DOMINIC; 2-WIT SWORN; MOTION TO ENROLL AS COUNSEL OF RECORD FOR PLTF GRANTED & SIGNED; JUDGE RICHARD READ INTO THE RECORD ALL EMAIL PLEADINGS FROM PLTF & HIS SPOUSE RECEIVED 10/31/24 TO 11/7/2024; PLTFS MOTION TO CONTINUE TRIAL DENIED; COURT INFORMS DEFT ATTY THAT HER 10/31/24 MOTIONS FILED WOULD BE DENIED DUE TO UNTIMELINESS; COUNSEL K. DOMINIC WITHDRAWS MOTIONS & O. SCHRUMPF RENDERED HIS OPPOSITIONS MOOT; COURT ORDERED A REPORT BY DOCTOR CONFIRMING PLTF CANNOT TRAVEL. UPON RECEIPT JUDGE RICHARD WILL GRANT PLTF REQUEST TO APPEAR VIA ZOOM; MRS. KING & COUNSEL MUST APPEAR LIVE. (DR. REPORT DUE BY MONDAY, 11/11/2024). RCR	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $9.00	*ServCost:*		

11/7/2024	MOTION TO ENROLL AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY OLIVER JACKSON SCHRUMPF & SIGNED BY JUDGE RONALD C. RICHARD 11/7/2024. CERT OF SERVICE. CONF COPY TO PLTF ATTY.MOTION/CONF COPY	*Code:* JF *Deposit:* *Cost:* $9.00	*ServType:* *ServCost:*
11/7/2024	MOTION & ORDER TO CONTINUE NOV. 14, 2024 TRIAL FILED HEREIN BY PLTF THRU ATTY ***DENIED BY JUDGE RONALD C. RICHARD***	*Code:* JF *Deposit:* *Cost:* $6.00	*ServType:* *ServCost:*
11/8/2024	RECEIVED ORIGINAL MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. ATTACHED EXHIBITS (8 PAGES)MOTION (4 PAGES)/ORDER2 DOCSEXHIBITS (8 PAGES)	*Code:* JF *Deposit:* *Cost:* $46.00	*ServType:* *ServCost:*
11/12/2024	PRE-TRIAL BRIEF (4 PAGES) FILED VIA EMAIL BY PLTF THRU ATTY OLIVER SCHRUMPF.	*Code:* CF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*
11/14/2024	PLTF APPEARS W/ATTY OLIVER SCHRUMPF; DEFT APPEARS W/ATTY KAMIE DOMINIC; 5 WITS SWORN; 10 DOCS INTRO (34 PAGES); PLAINTIFF FAILED TO PROVE BY PREPONDERANCE OF EVIDENCE THAT AMOS DID ANYTHING INCORRECT IN PROCESSING THIS MATTER, MS. COLSTON'S TESTIMONY COULD HAVE SWAYED THE COURT BUT PLAINTIFF FAILED TO SUBPOENA HER; COSTS AWARDED TO PLAINTIFF; FORMAL JUDGMENT TO BE SIGNED UPON PRESENTATION; HEARING ON MOTION FOR CONTEMPT; COURT HOLDS JOHN KING IN DIRECT CONTEMPT OF COURT AND FINED $500.00. RCR	*Code:* JF *Deposit:* *Cost:* $85.00	*ServType:* *ServCost:*
11/14/2024	CONTEMPT OF COURT FINE ASSESSED TO PLTF, JOHN CLIFFORD KING IN THE AMOUNT OF $500.00	*Code:* CF *Deposit:* *Cost:* $500.00	*ServType:* *ServCost:*

ORig to 10/31/24 Fax Filing

11/15/2024	RULE TO SHOW CAUSE ORDER FOR SHUNTE KING TO APPEAR & SHOW CAUSE WHY SHE SHOULD NOT BE HELD IN CONTEMPT OF COURT, PURSUANT TO LSA - CCP ART 222 FILED HEREIN & SIGNED BY JUDGE RONALD C. RICHARD**RULE WILL BE SET UPON SERVICE INSTRUCTIONS OBTAINED**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
11/15/2024	EMAIL REQUEST FOR ESTIMATED COST OF TRIAL TRANSCRIPT BY PLTF ATTY OLIVER SCHRUMPF ** TESTIMONY APPROXIMATELY 2 HOURS / REGULAR (WITHIN 30 DAYS) 150 PAGES X $4.75/PAGE = $712.50 / RUSH (WITHIN 10 DAYS) 150 PAGES X $5.50/PAGE = $825.00** PROVIDED TO MR. SCHRUMPF VIA EMAIL	*Code:*	NO	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - PLTFS MOTION TO RECONSIDER, MOTIONS TO INTERVENE LACK OF DUE PROCESS, MOTIONS TO DISMISS QUASH; ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF.DOCS/6	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$36.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - MOTION TO STRIKE AND SEAL CERTAIN LANGUAGE FROM THE RECORD (2PAGES); ORDER; AFFIDAVIT FILED HEREIN BY PLTF.DOCS/3EXH (14 PAGES)	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$46.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL EXHIBIT 1FILED HEREIN BY PLTF.EXH 15 PAGES	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$30.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - NOTICE OF SUBP TO DEFT ATTY KAMIE T. DOMINIC FILED HEREIN BY PLTF.	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
11/19/2024	RULE: TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KINGDATE: WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM	*Code:*	RU	*ServType:*
		Deposit:		
		Cost:	$4.00	*ServCost:*

Orig. to 11-7-2024 Fax Filing

Orig. to 11-7-2024 Fax Filing

Orig. to 11-7-2024 Fax Filing

11/19/2024	CITATION ORDER ISSUED (SHUNTE KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601 OR 1648 PAVILLION DR., IOWA, LA 70647)CONTEMPT OF COURTSENT TO CALCASIEU PARISH SHERIFF	*Code:* CIO *Deposit:* *Cost:* $10.00	*ServType:* *ServCost:*
11/19/2024	HEARING NOTICE FOR RULE TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KING SET FOR WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM MAILED TO ATTORNEY OLIVER JACKSON SCHRUMPF	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/19/2024	HEARING NOTICE FOR RULE TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KING SET FOR WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM MAILED TO ATTORNEY KAMIE T. DOMINIC	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/20/2024	LETTER REQUEST FOR COPY OF TRIAL TRANSCRIPT (REGULAR - WITHIN 30 DAYS) FILED HEREIN BY PLTF THRU ATTY OLIVER SCHRUMPF.	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/20/2024	ADDED DEPOSIT FROM CK/SCHRUMPF LAW OFFICE FOR TRIAL TRANSCRIPT OF $712.50 Deposit goes toward Transcript	*Code:* PD *Deposit:* $712.50 *Cost:*	*ServType:* *ServCost:*
11/21/2024	JUDGMENT READ & SIGNED BY JUDGE RONALD C. RICHARD **IN FAVOR OF DEFT, RENEE AMOS & AGA PLTF, JOHN CLIFFORD J KING, DISMISSING WITH PREJUDICE, ALL COSTS ASSESSED TO PLTF, JOHN CLIFFORD J KING** CC TO PLTF ATTY SCHRUMPF; CC TO DEFT ATTY DOMINIC.ORDER/2CC	*Code:* JU *Deposit:* *Cost:* $16.00	*ServType:* *ServCost:*
11/21/2024	NOTICE OF JUDGMENT MAILED TO (JOHN CLIFFORD J KING THRU ATTY OLIVER JACKSON SCHRUMPF @ 3801 MAPLEWOOD DR., SULPHUR, LA 70663)	*Code:* NJ *Deposit:* *Cost:* $10.00	*ServType:* *ServCost:*

11/21/2024	NOTICE OF JUDGMENT MAILED TO (RENEE AMOS THRU ATTY KAMIE T. DOMINIC @ 1400 RYAN ST., LAKE CHARLES, LA 70601)	*Code:*	NJ	*ServType:*	
		Deposit:			
		Cost:	$10.00	*ServCost:*	
11/21/2024	CLERK CERTIFICATE CERTIFYING NOTICE OF JUDGMENT MAILED TO PLTF THRU ATTY OLIVER JACKSON SCHRUMPF AND TO DEFT, RENEE AMOS THRU ATTY KAMIE T. DOMINIC. COPY TO PLTF ATTY; COPY TO DEFT ATTY.	*Code:*	NO	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	


The Judiciary Commission of Louisiana
Office of Special Counsel
NEW ORLEANS LA
PERSONAL AND CONFIDENTIAL


The Judiciary Commission of Louisiana
Office of Special Counsel
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The Judiciary Commission of Louisiana
Office of Special Counsel
NEW ORLEANS LA
PERSONAL AND CONFIDENTIAL

Re: Case # 24-118583 more crimes reported

From: True King <truekingfile@gmail.com>

To: Meagan Smith <msmith@cpdao.org>

Cc: David Guidry <dguidry@cpdao.org>

Date: Fri, 14 Feb 2025 14:15:30 -0500

Attachments:
image003.jpg
image002.jpg

Hello,
There need to be more incidents and claims added as I have not been in the state and I found out today an insurance claim was also filed 04/2021 for collision payout for a wreck I wasn't involved in and on a policy I filed no claim against and this is affecting additional insurance rates and driving record.

Mutual funds
Cars being stolen
SBA fees and lending
Life insurance cash values and total policies transferred with agents testifying I walked in the office but proof i wasn't in the state
- the court of appeals has also agreed I was not in the state and could not have committed these crimes or the many other documents that are being forged mailed and signed out.

This is impersonation and it's on the trial transcript from court.

How much of this do i have to accept be you guys put a stop to it?
On Thu, Feb 13, 2025 at 5:41 PM True King <truekingfile@gmail.com> wrote:

> Calling now
>
> On Thu, Feb 13, 2025 at 10:38 AM Meagan Smith <msmith@cpdao.org> wrote:
>
>> I just tried to call you again and left you a voicemail. Please call us
>> when you can.
>>
>>
>>
>> Thanks,
>>
>>
>>
>>
>>
>> *Meagan Smith *
>>
>> *Felony Trial Assistant to ADA David Guidry*| Felony Division F

>>
>> Calcasieu Parish District Attorney’s Office
>>
>> 901 Lakeshore Dr. Lake Charles, LA 70601
>> <https://www.google.com/maps/search/901+Lakeshore+Dr.+Lake+Charles,+LA+70601?entry=gmail&source=g>
>>
>> Direct Line: (337) 437-3281 | Email: msmith@cpdao.org
>>
>>
>>
>> *From:* True King <truekingfile@gmail.com>
>>
>> *Sent:* Thursday, February 13, 2025 9:34 AM
>> *To:* Meagan Smith <msmith@cpdao.org>
>> *Cc:* David Guidry <dguidry@cpdao.org>
>> *Subject:* Re: Case # 24-118583
>>
>>
>>
>> Phone number is working fine.
>>
>> (318) 995-1705
>>
>>
>>
>> I have put in case requests with the Parish in December. Megan you
>> mentioned updating multiple times and never sent an email.
>>
>> I’ve emailed 4 times in a row since then no response this has been almost
>> 100 days and you’ve never asked for witness testimony or told me what’s
>> being done to stop the impersonation that is on the record and confirmed by
>> a judge.
>>
>>
>>
>> Could you please tell me if you’ve been given any recent evidence and
>> last day you received evidence? Something has to be done about this.
>>
>> On Thu, Feb 13, 2025 at 10:24 AM Meagan Smith <msmith@cpdao.org> wrote:
>>
>> Mr. King,
>>
>>
>>
>> We tried to contact you this morning, but the phone number was not

>> working. Can you please verify the number? Or give us a call.
>>
>>
>>
>>
>>
>> *Meagan Smith *
>>
>> *Felony Trial Assistant to ADA David Guidry*| Felony Division F
>>
>> Calcasieu Parish District Attorney’s Office
>>
>> 901 Lakeshore Dr. Lake Charles, LA 70601
>> <https://www.google.com/maps/search/901+Lakeshore+Dr.+Lake+Charles,+LA+70601?entry=gmail&source=g>
>>
>> Direct Line: (337) 437-3281 | Email: msmith@cpdao.org
>>
>>
>>
>> *From:* True King <truekingfile@gmail.com>
>> *Sent:* Wednesday, February 12, 2025 5:52 PM
>> *To:* David Guidry <dguidry@cpdao.org>; Meagan Smith <msmith@cpdao.org>
>> *Subject:* Re: Case # 24-118583
>>
>>
>>
>> Hello Many months I have inquired about this case and I have two new
>> cases of impersonation and it is now affecting my drivers license. I have
>> not been contacted and would like to appeal this to a higher authority as
>> it appears my case and crimes against me are continuing. My safety and
>> safety of those around me continues to be threatened and I have forged
>> expenses and loans that need to be addressed. I have witnesses, I have
>> evidence please provide a response or advise who to seek relief from at
>> Attorney General or US Department of Justice.
>>
>>
>>
>> This case is not being handled despite all of the evidence supporting the
>> crime.
>>
>> May I have a status update?
>>
>> Is there some other reason why Im being denied justice?
>>
>> Please advise?

>>
>>
>>
>> On Mon, Dec 9, 2024 at 6:44 PM True King <truekingfile@gmail.com> wrote:
>>
>> Mr Guidry
>>
>>
>>
>> Please contact me concerning a series of repeated impersonation illegal
>> activities that are continuing as there is a third party who is being used
>> to represent me to do a number of financial crimes etc additionally i have
>> never been married before my current wife but there appears to be some
>> discussion saying I was married while I was once again not in the state and
>> the person was under a restraining order.
>>
>>
>>
>> I have signed and notarized none of the documents that are circulating to
>> perpetuate my identity, harass my home and continue to attempt to set me up
>> for crimes and the person accused has become more embolden and I have been
>> suffering for many years this financial abuse and harassment stalking and
>> attempting to by force force me into marriages and representing herself as
>> my wife and saying my parents are legally her in laws and I have provided
>> affidavit of non marriage to prove I’ve never been married.
>>
>>
>>
>> I have reported several incidents please contact me regarding the matter
>> as the bulk of the evidence you have not even seen please and thank you .
>>
>> John C King
>>
>> 3189951934
>>
>>





Wednesday, July 12, 2023

CITY COURT
City of Lake Charles, Louisiana

P.O. Box 1664
Lake Charles, Louisiana 70602
(337) 491-1564

Hearing NOTICE

Defendant **COLSTON, CHARMAIN**

ATTN: DERRICK KEE
723 BROAD STREET
LAKE CHARLES, LA 70601

JOHN KING

VS SuitNo: **23-1206**
CHARMAIN COLSTON

Please be advised that the above numbered and entitled cause has been fixed for **Hearing** at **9:00 AM** on **Wednesday, August 16, 2023**, in the City Court Building located at **118 West Mill Street, Lake Charles, La.**

Should you need witnesses, please furnish us with the name and addresses at least 1 (one week in advance of the trial date. We require advance deposit to cover service and witness fees

If you have any type of audio/visual presentation, please contact our office at (337) 491-1564 to set up or got to www.lccitycourt.org for instructions.

Deputy Clerk

11.8.2024
Good Morning Mr Schrumpf,

Attached are links to the “guilty party” who created the documentation Judge Redd claims is the practice of law. Im pretty sure they would need to be served at a California address. This is 100% the guilty party as every word in the submitted motions is exactly as the evidence reflects was submitted to the clerks office.

Link #1 https://chatgpt.com/share/672df309-c7d4-8004-8d27-f00bdc0ca49a

Link # 2 https://chatgpt.com/share/672dfa04-b218-8004-81ac-2957ee97498a



Chat AI





Can you show me terms and conditions of the Hartford surety bond

I'm unable to access real-time information or specific documents from The Hartford or other external source, including their surety bond terms and conditions. For detailed information about The Hartford's surety bond terms and conditions, I recommend visiting their official website or contacting them directly.

Alternatively, if you have a specific surety bond from The Hartford and are looking for information within the bond agreement, I recommend reviewing the document itself or contacting The Hartford's customer service or legal team for assistance.

Can you show me terms and conditions of the Hartford surety bond for notaries

Chat AI

This is a conversation in between human and Chat AI. AI is friendly, smart and very helpful.

Can you help me find cases about Louisiana notary fraud

I can't browse the internet to find real-time information or specific legal cases. However, I can suggest general information about Louisiana notary fraud or guide you on where to look for such cases. Would you like me to provide some general information on the topic?

Can you tell me about cases involving Louisiana notary fraud peremptory exceptions

Peremptory exceptions in Louisiana are essentially summary judgment motions that allow a party to seek the dismissal of a case without a trial based on certain

Chat AI

How to prove discovery exceptions statute of limitations Louisiana

In Louisiana, to prove an exception based on the statute of limitations for discovery, you typically need to show that the cause of action was not reasonably discoverable by the plaintiff until a certain point in time. This often involves demonstrating that the plaintiff could not have known about the injury or cause of action through reasonable diligence.

Here are some steps to consider when proving the discovery exception statute of limitations in Louisiana:

1. Understand the Law: Familiarize yourself with the specific statute of limitations laws in Louisiana related to the type of case you are dealing with. Different types of legal actions have different statutes of limitations.

2. Gather Evidence: Collect all relevant evidence that supports your claim that the cause of action was not discoverable

discovery.

3. Build a Timeline: Create a timeline of events showing when the injury or cause of action was discovered or should have been discovered through reasonable diligence. This timeline can be crucial in demonstrating that the discovery exception applies.

4. Consult with an Attorney: Legal matters involving statutes of limitations can be complex, so it's advisable to consult with a qualified attorney who is experienced in Louisiana law. They can provide guidance on the specific requirements for proving the discovery exception and help you navigate the legal process.

5. File a Motion: If you believe that the discovery exception applies in your case, you may need to file a motion with the court to assert this defense. Your attorney can help you prepare and submit the necessary documentation to support your argument.

Remember that the specific steps and requirements for proving the discovery

justice in such complex legal matters.

What are some common challenges legal professionals face when negotiating with opposing parties in cases of notarial misconduct or negligence?

Legal professionals may encounter several challenges when negotiating with opposing parties in cases involving notarial misconduct or negligence. Some common challenges include:

1. Denial of Liability: The opposing party may deny any wrongdoing or may refuse to acknowledge the notarial misconduct or negligence, making negotiations challenging.

2. Lack of Cooperation: The opposing party may be uncooperative, making it difficult to gather information, reach agreements, or move forward with negotiations.

negotiations.

4. Emotional Factors: Emotions can run high in legal disputes, especially when allegations of misconduct or negligence are involved. Emotions can hinder rational decision-making and impede successful negotiations.

5. Power Imbalance: Power dynamics between the parties can affect negotiations. If one party has more resources, influence, or leverage, it can create an imbalance that makes negotiations challenging for legal professionals.

6. Multiple Parties: In some cases, there may be multiple parties involved, each with different interests and perspectives. Coordinating negotiations and reaching agreements with multiple parties can be complex.

7. Limited Communication: Communication breakdowns or lack of effective communication between the parties can hinder negotiations and make it challenging to find common ground or reach a settlement.

that:

- The email is what it claims to be
- The email was sent or received by the person claimed to have sent or received it
- The email is relevant to the case

- **Format**: The records must be in a court-admissible format.
- **Preservation**: Email evidence can be accidentally deleted or its authenticity questioned.
- **Requesting evidence**: Litigants can request email evidence through a Request for Production or written Interrogatories.
- **Authenticating evidence**: A single email can be validated by confirming it with other email sources.
- **Spoliation**: The destruction of emails and other electronic data is punishable by the

4:37

marylandinjurylawcenter.com

Free Case Evaluation: **800-553-8082**

TAP TO CALL TAP TO TEXT

one. How do you get the emails authenticated? Defendant claimed that the prosecution did not do what it had to do to allow the jury to consider, and convict in this case, the emails.

There are many paths to authenticate e-mails. It can be as easy as getting the witness who received the email to testify that the printed email was received. Emails also usually show the source so authentication can be done just like U.S. Mail can be authenticated. There is also the business record exception. So, on its face, this is not a big deal.

But the problem is emails are so easy to fake,

4:40

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TAP TO CALL TAP TO TEXT

as a condition precedent to admissibility is satisfied by evidence sufficient to support a finding that the matter in question is what its proponent claims." Ultimately, authentication serves the purpose of "requiring the presentation of evidence sufficient to show that the evidence sought to be admitted is genuine."

Hearsay Problem

In addition, emails may be subject to the hearsay rule, which generally prohibits the admission of out-of-court statements made by someone other than the witness who is testifying, unless an exception to the rule applies. One such exception is the business

4:44

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TAP TO CALL TAP TO TEXT

mail" (i.e. do they contain information that only the alleged sender would possess?), the use of names or nicknames, and any other identifying factors that could link an e-mail address to a certain person as to its sender or author.

The piece of circumstantial evidence that doomed Defendant and authenticated the e-mails as being written by him was the paper found in his house with the various email addresses recorded on it, some of which were used to communicate lies to the police and threats to the bar owner.

When coupled with the fact that the e-mails all covered the same subject, were written in the same tone, written during the same time

4:45

marylandinjurylawcenter.com

Free Case Evaluation: **800-553-8082**

TAP TO CALL TAP TO TEXT

Mr. Donati.

Combined with the direct evidence provided by the police officers as to the authenticity of their half of the electronic communications, the court found sufficient grounds to uphold the authentication of the e-mails by the trial court.

How to Present Email Evidence in Court Though a Witness

Here is an example of a lawyer admitting an email through a witness by laying a proper foundation:

Lawyer: Ms. Doe, I would like to direct your

4:46

marylandinjurylawcenter.com

Free Case Evaluation: **800-553-8082**

TAP TO CALL TAP TO TEXT

- The Federal Rule of Evidence 901 provides the standard for the authentication of evidence, including emails. Rule 901(a) requires that the proponent of the evidence must present sufficient evidence to support a finding that the item is what the proponent claims it is.
- The court reiterated the 5 step approach set forth by the U.S. Supreme Court in **Neil v. Biggers** 409 U.S. 188, 189 (1972) for determining the reliability of in-court voice identification: (1) the ability of the witness to hear the assailant speak, (2) the witness's degree of attention, (3) the accuracy of any prior identifications the witness made, (4) the period of time

Additionally evidence of the paid paralegals who assisted in past editing and review.

You will also find attached undisclosed evidence of exparte unethical communications that have been alleged against Ms Lawdins- Trent and LaKoshia Roberts. This is the root of the lies and Judge Richard has been played by them.

Please advise best ways to proceed in serving the “villian” who created the motions that Judge Richard alleges false allegations against Shunte King simply because technology has outpaced the speed of law.

There are also subscriptions to two other legal document preparation apps which are permissible for Pro Se use.

Notice of Correction of False Addresses and Appellate Misrepresentations

Plaintiff submits this Notice to correct multiple inaccuracies and fabricated statements that appear in the record. Plaintiff has never lived in or provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and all fees assessed for service at that location were created without factual basis and must be removed immediately.

Additionally statements made by attorney Mr Bauman regarding the location of a homicide are false. The incident referenced in the appellate filings occurred in Houston Texas not Iowa Louisiana. The claim that Plaintiff spouse called helicopters is also false and unsupported. These misrepresentations distorted the appellate record and contributed to inflated court costs and retaliatory actions taken by the Court.

Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

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Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

Tuesday, November 19, 2024

CITY COURT
City of Lake Charles, Louisiana

P.O. Box 1664
Lake Charles, Louisiana 70602
(337) 491-1564

Hearing NOTICE

Plaintiff **KING, JOHN CLIFFORD J**

ATTN: OLIVER JACKSON SCHRUMPF
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

JOHN CLIFFORD J KING

VS SuitNo: **23-2124**

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Contempt of Court on Shunte King

Please be advised that the above numbered and entitled cause has been fixed for **Hearing** at **9:00 AM** on **Wednesday, January 22, 2025**, in the City Court Building located at **118 West Mill Street, Lake Charles, La.**

Should you need witnesses, please furnish us with the name and addresses at least 1 (one week in advance of the trial date. We require advance deposit to cover service and witness fees

If you have any type of audio/visual presentation, please contact our office at (337) 491-1564 to set up or got to www.lccitycourt.org for instructions.

Clerk

RECD LC CITY COURT CIV
'24 NOV 15 PM 3:38

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS. NO. 23-2124	:	WARD 3, CALCASIEU PARISH
RENEE AMOS NOTARY PUBLIC ID# 29374	:	STATE OF LOUISIANA
FILED: 11-15-2024	:	M Clerk ~~DEPUTY~~ CLERK OF COURT

RULE TO SHOW CAUSE

SHUNTE KING (a non-party in the referenced matter) is hereby ordered to appear on the 22nd day of January, 2025 at 9:00 o'clock A.m., to show cause why she should not be held in contempt of court, pursuant to LSA – C.C.P. Art. 222, based on the following:

1. Willful disobedience of any lawful judgment, order, mandate, writ, or process of court (La C.C.P. Art. 224(2)); specifically, Shunte King willfully interrupted the course of the November 14, 2024 hearing on a contempt of court charge lodged against her husband, plaintiff John Clifford J King. Shunte King willfully and knowingly and unlawfully called 911 in an effort to remove her husband, John Clifford J King from the courtroom while under direct examination by Judge Ronald C. Richard. Shunte King intentionally and willfully disrupted and interfered with court proceedings.

SIGNED this 15th day of November, 2024.

RONALD C. RICHARD
JUDGE, DIVISION B

A TRUE COPY
Date: 11-19-2024
Clerk

Re: Contempt

From: True King <truekingfile@gmail.com>

To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

Date: Fri, 22 Nov 2024 12:44:02 -0500

Mr Schrumpf they keep increasing my cost unjustly. It's $55 per service and they just served my wife KNOWING service at your office was moot, I don't know where they even got an IOWA address, she doesn't live in lake charles and they were informed by her attorney and her that she is not a Nj resident and her address cannot appear on record.

They're changing receipt dates when tracking number says my mail was received many days before what they're putting on record:
- they're charging me for the device on the untimely motion filed by Kamie on Oct 31 and for the service that the judge signed and then threw out that's another $55
- they're charging me for email filings
When courts phones and fax lines were down nov 1- Nov 4 and I overnighted copies with tracking so
They're doubling my filing fees.

It was $2000 I had $1000 credit on record and you sent over $800. They wasted flight money and made me pay two hours of them accusing my wife of practicing law only to
Discover Chat GPT created the documents and they had real
Time receipts.
- he's charging my wife with contempt a full week after the hearing after finding out I filed impersonation charges with CPSO against charmaine colston so in retaliation he's doing more contempt charges and everytime we call or email attaching more charges saying we're not allowed to contact about the case.

I understand Renee Amos is his friend but this is so boldly unbalanced I cannot pay off fees they're intentionally adding more daily and creating fees out of thin air.
Please isn't there a way to suspend paying the fees as I am
A pauper in the interest of justice as this shouldn't prevent someone from Appealing and contempt fees and services are not apart of this case and should not go up with the case correct ?

On Fri, Nov 22, 2024 at 12:31 PM Oliver Schrumpf <oschrumpf@schrumpf-law.com> wrote:

> I am okay with the proposal to pay $1000.00 next week (Tuesday) and
> $1000.00 the week after (Friday).
>
>

>
> We will file the Motion and Order for Devolutive appeal on Monday,
> November 25.
>
>
>
> Cost will need to be paid As required by La. C.C.P. Art. 2126. Payment
> of costs
>
> A. The clerk of the trial court, immediately after the order of appeal
> has been granted, shall estimate the cost of the preparation of the record
> on appeal, including the fee of the court reporter for preparing the
> transcript and the filing fee required by the appellate court. The clerk
> shall send notices of the estimated costs by certified mail to the
> appellant and by first class mail to the appellee.
>
> B. Within twenty days of the mailing of notice, the appellant shall pay
> the amount of the estimated costs to the clerk. The trial court may grant
> one extension of the period for paying the amount of the estimated costs
> for not more than an additional twenty days upon written motion showing
> good cause for the extension.
>
> C. The appellant may question the excessiveness of the estimated costs by
> filing a written application for reduction in the trial court within the
> first twenty-day time limit, and the trial court may order reduction of the
> estimate upon proper showing. If an application for reduction has been
> timely filed, the appellant shall have twenty days to pay the costs
> beginning from the date of the action by the trial court on application for
> reduction.
>
> D. After the preparation of the record on appeal has been completed, the
> clerk of the trial court shall, as the situation may require, either refund
> to the appellant the difference between the estimated costs and the actual
> costs if the estimated costs exceed the actual costs, or send a notice by
> certified mail to the appellant of the amount of additional costs due, if
> the actual costs exceed the estimated costs. If the payment of additional
> costs is required, the appellant shall pay the amount of additional costs
> within twenty days of the mailing of the notice.
>
> E. If the appellant fails to pay the estimated costs, or the difference
> between the estimated costs and the actual costs, within the time
> specified, the trial judge, on his own motion or upon motion by the clerk
> or by any party, and after a hearing, shall:
>
> (1) Enter a formal order of dismissal on the grounds of abandonment; or
>

> (2) Grant a ten day period within which costs must be paid in full, in
> default of which the appeal is dismissed as abandoned.
>
> F. If the appellant pays the costs required by this Article, the appeal
> may not be dismissed because of the passage of the return day without an
> extension being obtained or because of an untimely lodging of the record on
> appeal.
>
> Amended by Acts 1976, No. 708, §2; Acts 1977, No. 198, §2, eff. Jan. 1,
> 1978; Acts 1978, No. 449, §1, eff. Jan. 1, 1979; Acts 1984, No. 937, §1;
> Acts 1995, No. 105, §1.
>
>
>
> Oliver “Jackson” Schrumpf
>
> Schrumpf Law Office (PLC)
>
> 3801 Maplewood Drive
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA%C2%A0+70
663?entry=gmail&source=g>
>
> Sulphur, LA 70663
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA%C2%A0+70
663?entry=gmail&source=g>
>
> Phone: 337-625-9077
>
> Fax: 337-625-8231
>
> oschrumpf@schrumpf-law.com
>
>
>
>
>
>
>
>
>
>
> *From:* True King <truekingfile@gmail.com>
> *Sent:* Friday, November 22, 2024 11:17 AM
> *To:* Jinnifer LeBlanc <Jleblanc@schrumpf-law.com>; Oliver Schrumpf <
> oschrumpf@schrumpf-law.com>
> *Subject:* Re: Contempt
>

>
>
> Ms Jinnifer,
>
> Thank you
>
> Please advise Mr Schrumpf I will be moving forward with the appeal on the
> small claims case.
>
>
>
> Please ask Mr Schrumpf due to the last minute extra travel expenses and
> unnecessary expenses being attached to my case if I can pay $1000.00 next
> week (Tuesday) and $1000.00 the week after (Friday) .
>
>
>
> Please ask him if the contempt charges are sent up with the case when it
> is reviewed for appeal or is it separate ? If it’s included it seems the
> contempt charges were placed to sway and damage chances for appeal and
> discredit my witness who is my spouse. Is there a way to stick only to the
> case and prevent any outside contempts from going up with the case?
>
>
>
> An appeal is needed and I’m grateful for his help with the matter
>
>
>
> Grateful
>
> The “REAL” John King
>
>
>
> On Fri, Nov 22, 2024 at 10:30 AM Jinnifer LeBlanc <
> jleblanc@schrumpf-law.com> wrote:
>
> Good morning,
>
> Attached is our letter to Judge Richard and the Contempt Hearing
> Notice and Rule.
>
>
> Thank you,
> Jinnifer Marcantel

> Paralegal to Oliver “Jackson” Schrumpf
>
> Schrumpf Law Office, PLC
> 3801 Maplewood Drive
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA+70663?entry
=gmail&source=g>
> Sulphur, LA 70663
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA+70663?entry
=gmail&source=g>
> (337) 625-9077
> (337) 625-8231 (fax)
>
> **If you have not executed a binding fee agreement or an agreement for
> representation, this firm does not represent you and this email is not an
> agreement of representation.**
>
> ***Please note that unless expressly stated otherwise, I have NOT
> expressly designated my email address as appropriate for electronic
> service of a pleading or other writing under LA CCP 1313.***
>
> Confidentiality Statement: This e-mail transmission, and any documents,
> files, or e-mail messages attached to it, may contain confidential
> information that is attorney work product and/or legally privileged. The
> information herein is also protected by the Electronic Communications
> Privacy Act, 18 U.S.C.A. 2510-2521. The information contained in this
> message and any file transmitted with it is transmitted in this form based
> upon a reasonable expectation of privacy consistent with ABA Formal
> Opinion No. 99-413. If you are not the intended recipient, or the person
> responsible for delivering it to the intended recipient, you are hereby
> notified that any disclosure, copying, distribution or use of any of the
> information contained in or attached to this transmission is STRICTLY
> PROHIBITED. If you have received this transmission in error, please notify
> sender immediately via return email or by telephone at (337) 625-9077 and
> destroy the original transmission and its attachments without reading them
> or saving them to disk or otherwise. Thank you.
>
>

**John CJ King Sr.
Plaintiff, Pro Se**
**VS Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana**

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions**
Dear Honorable Judge Richard,**

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions
Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  **Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601**
  kamiedominiclaw@gmail.com

- "The Hartford": Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of

further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant’s Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant's claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested
In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Thank you for your time and consideration.

Respectfully submitted,
John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Exhibits attached audio mailed separately.

Respectfully submitted by
John CJ King Sr.
123 N. Louisiana Avenue
Lake Charles LA 70601
truekingfile@gmail.com
318-995-1705

ORDER

Considering the foregoing motion IT IS ORDERED that this matter come on for trial on the ____ day of _____ or the year 2024 or 2025 at _____ o'clock AM Lake Charles, Louisiana this day of _____

STATE OF LOUISIANA
PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared John CJ King Sr., who, after being duly sworn, did depose and say:

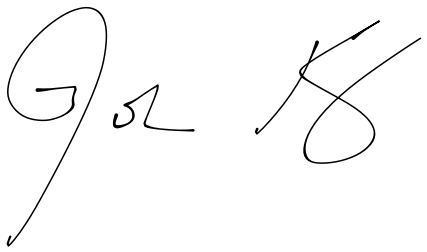
1. **Affiant's Personal Knowledge: I, John CJ King Sr., am the plaintiff in case number VS NO. 23-2124, currently pending before the Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.**
2. **Grounds for Motion: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.**
3. **Request for Continuance: Due to this medical condition, I am unable to attend the hearing scheduled for November 14, 2024, and respectfully request a continuance to allow sufficient time for my medical recovery and to secure adequate legal representation.**
4. **Truthfulness of Submissions: I affirm that all statements and evidence presented in this motion are submitted in good faith, without any intent to delay, defraud, or deceive the Court or any party. The attached documents are accurate and true representations of my medical status and travel**

records, provided to substantiate my request.

5. **Opposition to Frivolous Claims and Sanctions: I further affirm that my responses to the defendant's Motion to Strike and Motion for Sanctions are made in good faith, as I have provided evidence to support all claims filed in this matter. I deny any claims of fraudulent inducement, and I respectfully request that the Court deny the defendant's motions accordingly.**

Further, Affiant saith not.

Signature: _____



John CJ King Sr.

Date: ___10/31/2024_____

Sworn to and subscribed before me this _____ day of _____, 2023.

Notary Public

My Commission Expires: _____

This affidavit should be signed and notarized to accompany your motion.

4o

Official Witness Statement of…

Vincent Luu Co- Owner

Arrival Fitness

87 Halsey St, Newark NJ 07102

Vincentluu@arrivalfit.com

Date: March 11, 2024

I, Vincent Luu, being of sound mind and body and the owner of Arrival Fitness located in the state of New Jersey, USA, do hereby provide this witness statement in connection with the presence of John King Sr at my fitness facility on September 6, 7, and 8, 2021.

I affirm that John King Sr was physically present at Arrival Fitness on the aforementioned dates. On September 6, 2021, the workout session took place outdoors at Military Park, which is located within the state of New Jersey, due to the facility being closed in the days leading up to September 6, 2021, as a result of flooding. The state of New Jersey was under a state of emergency during this time, as confirmed by emails time-stamped and sent to John King Sr, notifying him that the workout would have to take place outside on the morning of September 6, 2021.

Several members attended the morning classes at Military Park on September 6, 2021, with John King Sr being one of them. Subsequent days, September 7 and 8, also saw John King Sr participating in the morning classes within the facility premises once it reopened.

I can attest to having known John King Sr for nearly three years, further confirming his regular attendance at Arrival Fitness. Attached herewith are screenshots of videos and photos, as well

as a copy of the attendance record for September 6, 7, and 8, 2021, all of which are date and time-stamped, serving as concrete evidence of John King Sr's presence.

The witnesses present alongside John King Sr during these sessions include Jason DeJesus, Romeo Delacruz, Justin Lewis, Chanel Alexander, Shunte King, and others listed in the attendance record. While some may not feature in the provided exhibits, their presence is duly noted.

Should further verification be required, I can be contacted at 862-231-5202 or via email at Vincentluu@arrivalfit.com. I am willing to confirm under oath that John King Sr was physically standing in the state of New Jersey at Arrival Fitness on September 6, 7, and 8, 2021.

Signed

Vincent Luu

Vincent Luu

Co- Owner, Arrival Fit

(Notary Stamp located under exhibits)

State of Florida
County of Miami-Dade
Sworn to (or affirmed) and subscribed before me by means of online notarization, this 03/11/2024 by Vincent Han Luu.

Carola Villamizar

CAROLA VILLAMIZAR
Notary Public - State of Florida
Commission # HH 427934
Expires on July 31, 2027

Carola Villamizar

___ Personally Known OR __✔ Produced Identification

Type of Identification Produced __DRIVER LICENSE

Notarized remotely online using communication technology via Proof.

Exhibits enclosed of attendance records for dates above, time stamped imaging/video, emails to John King Sr.

Attached here

Newark
September 8, 2021 8:33 AM

Edit



.



Add a Caption

Wednesday • Sep 8, 2021 • 8:33 AM

Adjust

IMG_2117

Apple iPhone 11

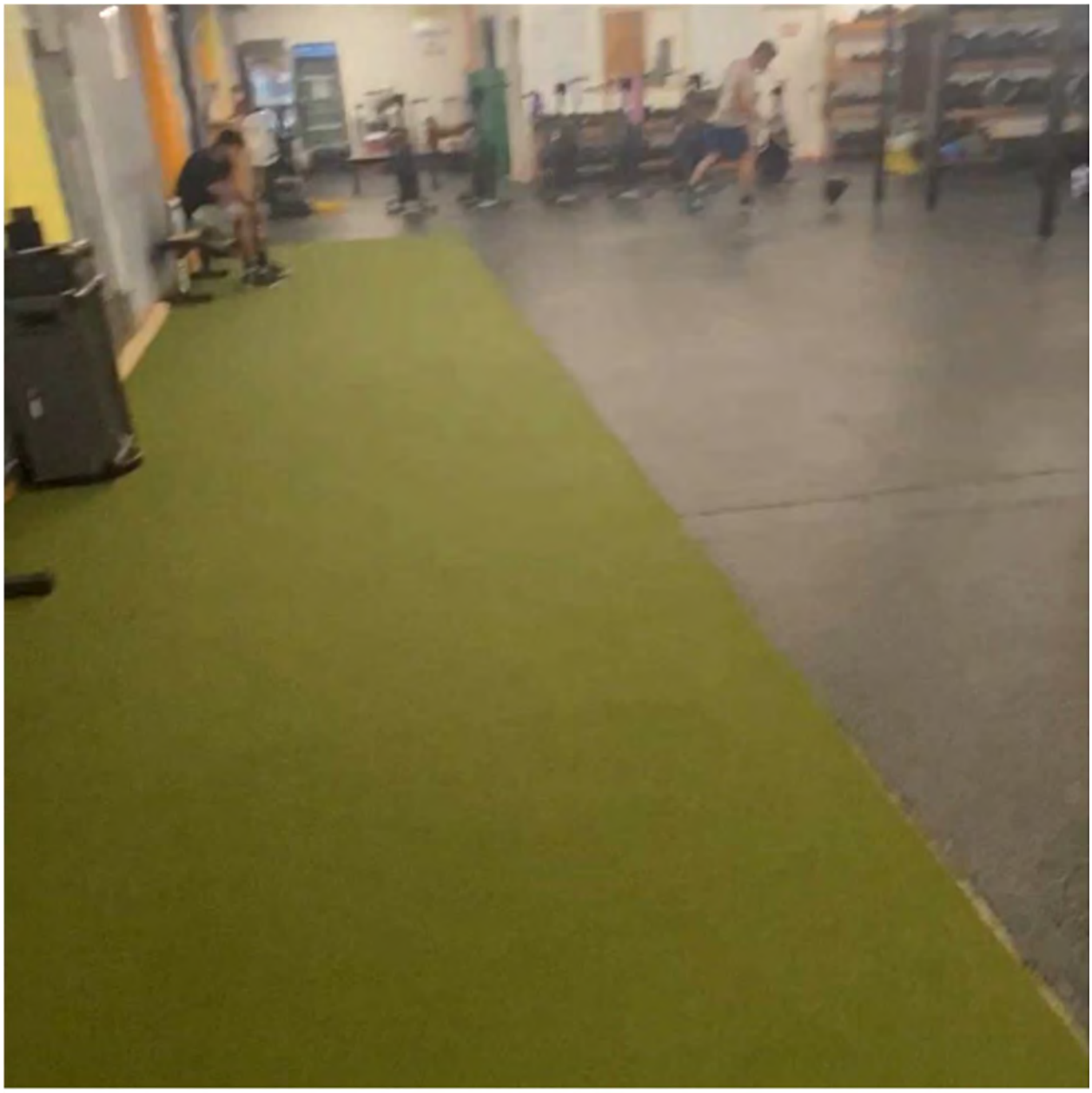
HEIF

Wide Camera — 26 mm ƒ1.8

12 MP · 3024 × 4032 · 2 MB

ISO200 | 32mm | 0ev | ƒ1.8 | 1/60s





Add a Caption

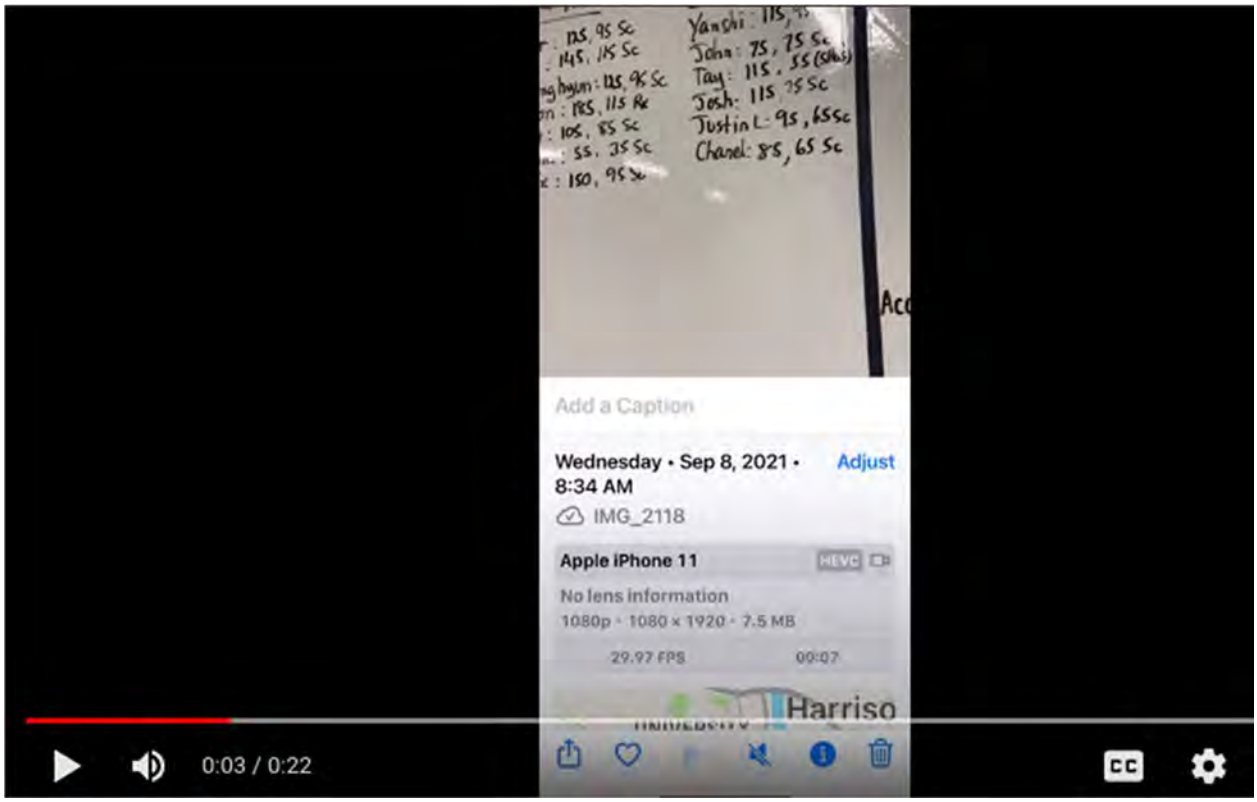
Wednesday • Sep 8, 2021 • 8:34 AM

Adjust

IMG_2118

Apple iPhone 11

HEVC



Sept 6 Morning attendance military park NJ

Military Park
September 6, 2021 9:18 AM

Edit



Add a Caption

Monday • Sep 6, 2021 • 9:18 AM

Adjust

IMG_1955

Apple iPhone 11

HEVC

No lens information

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Section Allocated for Notary Seal

I, Vincent Luu verify to the best of my knowledge that the statements and exhibits above are true.

Signed

Vincent Luu

Schrumpf Law Office

A Professional Law Corporation
3801 Maplewood Drive
Sulphur, Louisiana 70663

Oliver "Jackson" Schrumpf*
Stacy D. Saltzman†

(337) 625-9077
Fax: (337) 625-8231

* Licensed in LA and TEXAS
† Licensed in LA and MISSISSIPPI

November 22, 2024

VIA EMAIL: ron@lccitycourt.org and mabshire@lccitycourt.onmicrosoft.com

Honorable Judge Ron Richard
Lake Charles City Court
118 W. Mill Street
Lake Charles, LA 70601

Re: John Clifford J King
Vs. 2023-2124
Renee Amos, Notary Public
Notary ID #29374
Lake Charles City Court

Dear Judge Richard,

Please be advised that I do not represent Shunte King in the contempt of court proceeding. Attempted service on me for the contempt proceeding is not effective.

Respectfully,

Oliver Schrumpf

Oliver "Jackson" Schrumpf

OJS/jm


Patient Transport
General
Elevators

Gmail **John King <johncjking86@gmail.com>**

October continuance King Case #23-2124

2 messages

True King <truekingfile@gmail.com> Thu, Oct 31, 2024 at 5:27 PM
To: True King <truekingfile@gmail.com>, John King <johncjking86@gmail.com>
Cc: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Please find motion attached a fax copy has been faxed and physical copy mailed please call to process any payment but is a pauper

Contiuanceactober.pdf
368K

True King <truekingfile@gmail.com> Thu, Oct 31, 2024 at 9:12 PM
To: True King <truekingfile@gmail.com>, John King <johncjking86@gmail.com>
Cc: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Ms Abshire,
Please find video and images and audio files attached to accompany motion as I have confidentially spinal disease resulting from traumatic impact and has been degenerative and as of last week the paralysis has set in.

Ambulance photos hospital admissions and spinal cord compression prevents ability to walk without walker and neck brace. The seizures also accompany this disorder.

On top of having my assets stolen job taken yes I was told my son was dying had to have emergency surgery this was a lie to get me to run to lake charles and as a result I now have degenerative skeletal disease.

These games they are playing filing frivolous motions are playing with my life and is another form of financial abuse.

Please attach for Judge Richard they're trying to drag this out until I die in order to cover up what has been done to me.

Physical copy mailed separately only one faxed copy needs to be filed of continuance please tell me the amount owed.

And yes I'm still being harassed and so is my family.
JCJKing



[Quoted text hidden]

5 attachments



IMG_3394.jpeg
104K



IMG_3395.jpeg
89K



A2684C5B-4F83-4F62-853A-98E8FE6B5D64.jpeg
2031K



EAC37BC8-BFB1-41BE-872D-85E5FF774032.jpeg
2466K

IMG_1561.mp4
4706K

RE: Emailing: 23-2124 King vs. Amos - Statement (2)

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>, ed@lakecharlesattorney.com

Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>, Kay Bang <kay.bang@lccitycourt.org>

Bcc: truekingfile@gmail.com

Date: Thu, 09 Jan 2025 14:48:51 -0600

Monica, I believe I will also need a certified copy of the minutes of December 30, 2024 hearing and a certified copy of the prior Order granting In Forma Pauperis status to John King in this case.

Please advise when I may send a runner for these items. Thank you.

Oliver "Jackson" Schrumpf
Schrumpf Law Office (PLC)
3801 Maplewood Drive
Sulphur, LA 70663
Phone: 337-625-9077
Fax: 337-625-8231
oschrumpf@schrumpf-law.com

-----Original Message-----
From: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>
Sent: Tuesday, January 7, 2025 11:09 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>; ed@lakecharlesattorney.com
Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>; Kay Bang <kay.bang@lccitycourt.org>
Subject: Emailing: 23-2124 King vs. Amos - Statement (2)

Good Morning -

Please see attached the statement for cost of the transcript prepared for hearing held on 12/30/2024.

Mr. Schrumpf - Transcript is ready. Do you want to send someone to pick up or do you want me to place in the mail? Also, do you want a refund of the difference of the cost of transcript?

Mr. Bauman - If you would like a copy of transcript, please send request in writing along with the statement payment to Lake Charles City Court.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court

(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs. Amos - Statement (2)

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Emergency Notice of Prohibited Fee Enforcement

Plaintiff submits this Emergency Notice to preserve all rights before expiration of the statutory period and to document ongoing prohibited enforcement attempts. Plaintiff contacted the Clerk of Lake Charles City Court on this date to request removal of fees and costs that were entered after the Court was divested of jurisdiction on December 3 2024. The Clerk refused and stated that Judge Ronald C Richard is demanding that Plaintiff pay these fees.

All fees assessed after December 3 2024 are void under Louisiana Code of Civil Procedure article 2088. The Court lacked authority to issue orders hold hearings generate service returns or impose costs. Plaintiff has never provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and any fees based on those returns are fraudulent and unenforceable.

The Clerk refusal to remove void fees and the judge ongoing demand for payment constitute retaliation intimidation and abuse of authority. Plaintiff submits this Notice to ensure the record reflects that Plaintiff has objected to all post divestiture fees and that any attempt to enforce them now or in the future is unlawful and constitutes retaliation under state and federal law.

Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

Emergency Notice of Prohibited Fee Enforcement

Plaintiff submits this Emergency Notice to preserve all rights before expiration of the statutory period and to document ongoing prohibited enforcement attempts. Plaintiff contacted the Clerk of Lake Charles City Court on this date to request removal of fees and costs that were entered after the Court was divested of jurisdiction on December 3 2024. The Clerk refused and stated that Judge Ronald C Richard is demanding that Plaintiff pay these fees.

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Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

ORDER DIRECTING SERVICE ON DEFENDANTS

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff
Calcasieu Parish District Attorney
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator
Defendants

Civil Action No _____

ORDER GRANTING LEAVE TO AMEND

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity

Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

ORDER GRANTING LEAVE TO FILE FIRST AMENDED COMPLAINT

Considering Plaintiffs request for leave to file their First Amended Civil Rights Complaint

IT IS ORDERED that leave is GRANTED.

IT IS FURTHER ORDERED that the First Amended Civil Rights Complaint tendered by Plaintiffs is accepted and shall be filed into the record.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

WESTERN LOUISIANA FEDERAL COURT

NOTICE OF SUBMISSION

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

Civil Action No _____

NOTICE OF SUBMISSION

TO Clerk of Court
United States District Court
Western District of Louisiana
Lake Charles Division

PLEASE TAKE NOTICE that the following motions are hereby submitted to the Court for consideration on the papers unless the Court orders a hearing

1 Motion to Proceed Under Pseudonym
2 Motion for Temporary Restraining Order and Preliminary Injunction
3 Any related motions filed concurrently with Plaintiffs First Amended Civil Rights Complaint

Respectfully submitted
Dated November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

ORDER TO SHOW CAUSE

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAKE CHARLES DIVISION

S J K
and
J K
Plaintiffs

V

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

All Defendants listed above
Defendants

Civil Action No _____

ORDER TO SHOW CAUSE

Considering the allegations in Plaintiffs First Amended Civil Rights Complaint and the pendency of Plaintiffs Motion for Temporary Restraining Order

IT IS ORDERED that Defendants shall SHOW CAUSE in writing no later than _21___ days from entry of this Order why the preliminary relief requested should not be granted.

IT IS FURTHER ORDERED that Defendants shall specifically address the following issues

1 Whether Plaintiffs have demonstrated a likelihood of success on their constitutional claims
2 Whether Plaintiffs face ongoing irreparable harm
3 Whether Defendants oppose the requested injunction and on what factual and legal basis
4 Whether any factual disputes require an evidentiary hearing

Failure to respond may result in the issuance of injunctive relief based on the existing record.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

ORDER DIRECTING SERVICE ON DEFENDANTS

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff
Calcasieu Parish District Attorney
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator
Defendants

Civil Action No _____

ORDER DIRECTING SERVICE OF PROCESS

IT IS ORDERED that the Clerk of Court shall issue summonses for each named Defendant.

Hon Ronald C Richard
Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

City of Lake Charles
1001 Ryan Street
Lake Charles Louisiana 70601

Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

Calcasieu Parish Police Jury
1015 Pithon Street
Lake Charles Louisiana 70601

Calcasieu Parish Clerk of Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish Sheriff
5400 East Broad Street
Lake Charles Louisiana 70615

Calcasieu Parish District Attorney
1020 Ryan Street
Lake Charles Louisiana 70601

Fourteenth Judicial District Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish District Court Administrator
1000 Ryan Street
Lake Charles Louisiana 70601

IT IS FURTHER ORDERED that service of the First Amended Civil Rights Complaint and accompanying motions shall be made pursuant to Federal Rule of Civil Procedure 4 and all applicable local rules.

IT IS FURTHER ORDERED that Plaintiffs service address shall remain under seal and shall be disclosed only to the United States Marshal or other authorized service officer for purposes of effectuating service.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

PROPOSED SCHEDULING ORDER

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

Civil Action No _____

SCHEDULING ORDER

IT IS ORDERED that the following schedule shall govern this action unless modified by the Court

1 Initial disclosures under Federal Rule of Civil Procedure 26a shall be exchanged on or before _____

2 All amended pleadings shall be filed on or before _____
3 All motions to dismiss shall be filed on or before _____
4 All discovery shall be completed by _____
5 Expert reports shall be exchanged on or before _____
6 Dispositive motions shall be filed no later than _____
7 The pretrial conference is set for _____ at _____
8 Jury trial or bench trial is set for _____ at _____
9 Settlement conference as directed by the United States Magistrate Judge

SO ORDERED this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

WESTERN LOUISIANA DISTRICT

FOOTNOTES APPENDIX

FOOTNOTES APPENDIX

1 FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION protects the right to petition the government for redress and prohibits retaliation.

2 FOURTH AMENDMENT prohibits unreasonable seizures and unlawful detention.

3 FOURTEENTH AMENDMENT guarantees due process and equal protection.

4 NINTH AMENDMENT protects unenumerated rights including privacy and security.

5 42 U S C SECTION 1983 provides a cause of action for violations of constitutional rights under color of state law.

6 28 U S C SECTIONS 2201 AND 2202 authorize declaratory and injunctive relief.

7 LOUISIANA CONSTITUTION ARTICLE I SECTION 2 guarantees due process of law.

8 LOUISIANA CONSTITUTION ARTICLE I SECTION 3 prohibits arbitrary discrimination.

9 LOUISIANA REVISED STATUTES TITLE 46 SECTION 1844 provides for crime victim confidentiality.

10 LOUISIANA REVISED STATUTES TITLE 14 SECTION 72 addresses forgery.

11 LOUISIANA REVISED STATUTES TITLE 14 SECTION 67 addresses theft.

12 LOUISIANA REVISED STATUTES TITLE 14 SECTION 73 addresses computer fraud.

13 STATE CREATED DANGER doctrine recognizes liability when officials create or enhance danger.

14 MONELL LIABILITY under 42 U S C SECTION 1983 imposes liability on municipalities for unconstitutional policies or customs.

15 OFFICIAL CAPACITY suits are treated as actions against the governmental entity itself.

COURT OF APPEAL

THIRD CIRCUIT

STATE OF LOUISIANA

NO. 2025-0049-CA

JOHN CLIFFORD J. KING

Plaintiff/applicant

VERSUS

RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY

Defendants-respondents

DEVOLUTIVE APPEAL BRIEF OF PLAINTIFF

ON DEVOLUTIVE APPEAL FROM THE WARD 3 / LAKE CHARLES CITY COURT PARISH OF CALCASIEU, STATE OF LOUISIANA NO. 23-2124

HONORABLE RON RICHARD, PRESIDING

ORIGINAL BRIEF OF PLAINTIFF-APPELLANT, JOHN CLIFFORD J. KING,

A CIVIL CASE

Respectfully submitted:

Oliver Schrumpf

Oliver "Jackson" Schrumpf
Attorney for Applicant
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
Appeal Counsel
Bar Roll No. 11832

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La. Code of Civil Procedure Article 2081

JURISDICTIONAL STATEMENT

The Third Circuit Court of Appeal has jurisdiction to hear civil

appeals from the Ward 3- Lake Charles City Court for the Parish of Calcasieu, State of Louisiana, pursuant to La. Constitution of 1974, Article V., Section 10, granting authority to hear civil appeals from all cases arising in this Circuit; and based upon La. Code of Civil Procedure Articles 2081, et seq. This is an appeal from a final judgment dated November 21, 2024 dismissing plaintiff's claims with prejudice. [Record Vol. III, P. 547].

Notice of Judgment was sent November 21, 2024 [Record Vol. III, P. 570]

A Motion and Order of Devolutive Appeal was signed December 3, 2024 or December 5, 2024. [Record Vol. III, PP. 581, 583, 588]

7

4

I. STATEMENT OF THE CASE

FACTS:

John Clifford King, whose permanent residence was at his mother's house at 123 N. Louisiana Avenue, Lake Charles, La., worked out of town (in New Jersey and New York State) after Hurricane Laura. Mr. King

owned a 2011 red Chevrolet Traverse, La. license No. 346EYM, which he left at his mother's house and which he allowed his former girlfriend, Charmaine Colston, to drive to evacuate for Hurricane Laura. Unknown to Mr. King, while he was *in* New Jersey or working in New York state, on or about September 7, 2021, Charmaine Colston (either by herself or in conspiracy with someone else) appeared before a Notary, Renee Amos, in Lake Charles, La. and executed a fraudulent title transfer of the Chevrolet to Colston. Mr. King did not learn of this fraudulent transfer until August 25, 2022 when an investigative report of the Lake Charles Police Department was released to him. Meanwhile Charmaine Colston had sold the vehicle. When Mr. King stopped paying for insurance [Record Vol. III, P. 708 (Trial Transcript pp. 61-63)] on the Chevrolet, his license was suspended by the Louisiana Department of Motor Vehicles. It took money and effort by Mr. King to have his license re-instated. Also, Mr. King paid off the $8,400 balance owed on the vehicle. Mr. King instituted a suit against the Notary, Renee Amos, for executing a title transfer for Charmaine Colston when he, the title owner, was not present and did not sign [See

pleading Vol. I, PP. 9-13]. The trial on the merits was held November 14, 2024. The Trial Court, Hon. Ron Richard, was satisfied from the testimony

that John Clifford King was indeed out of state on September 7, 2021, when the title transfer occurred [Vol. IV, PP. 758-759 and record Vol. IV, PP 755-756 (See Trial Transcript p. 109, line 23-p. 110, line 16; and p. 115, lines 1-7)]. However, the Court relied upon the Notary's testimony that, although she had no recollection of this particular transaction, she testified that "my practice is to check the ID's of all parties, the buyer and the seller." [Record Vol. III, P. 665 (Transcript p. 19, lines 7-8)]. Mrs. Amos did not retain copies of the ID's [Record Vol. III, P. 666 (Transcript p. 20, line 21)].

She did not know Mr. King and would not have recognized him except for seeing him in Court in multiple proceedings. [Record Vol. III. PP. 666-667 (Transcript pp. 20-21)]. Ms. Amos had no memory of what happened on September 7, 2021. [Record Vol. III. P. 668 (Transcript p. 22, lines 11-12)].

Ms. Amos could not recall whether the alleged $100 consideration was paid or, if it was paid, in what manner it was paid [Record Vol. III. PP. 668-669 (Transcript p. 22, line 24 – p. 23, line 8)]. Ms. Amos did not keep a copy of the driver's license of the person she claimed signed the title transfer that day "because of the massive amount of people I see in a day, I could not possibly keep those records." [Record Vol. III, P. 669 (Transcript p. 23, lines 18-20)].

Mr. King paid off the balance owed on the car ($8400) on April 5, 2021. [Record P. 706] Mr. King kept the car continuously insured until February 2022 [Record P. 708]. Then Mr. King's Louisiana Driver's License was suspended because the car was not insured. [Record P. 709] It cost $875 to get his license re-instated [Record P. 709]

PRIOR PROCEEDINGS:

The trial court previously denied exceptions of prescription, not at

issue here.

The Court granted a Motion to Enroll for Oliver Schrumpf on November 7, 2024, but denied Schrumpf's motion to continue the trial. Trial was held November 14, 2024. The Court ruled the same day dismissing plaintiff's claims with prejudice and Judgment was signed November 21, 2024. [Vol. III, P. 547]

A Motion and Order for Devolutive Appeal was signed December 3, 2024. [Vol. III, P. 581]

The Court previously revoked pauper status after appeal was filed. This order was reversed by writ grant. (La. Third Circuit, CW 25-00044).

II. SPECIFICATIONS OF ERROR

A. **The Trial Court erroneously applied the burden of proof; after plaintiff proved he was out of state at the time the Notary allegedly notarized his signature to the title transfer, the burden of proof should have shifted back to the Notary to prove she properly identified John Clifford King as the signor.**

B. **The Trial Court erred in faulting plaintiff for not calling Charmaine**

Colston as a witness since Colston was the perpetrator who stole the vehicle; either party could have subpoenaed Colston. But Colston's testimony was unnecessary. The Notary failed to identify John King or anyone else as the signor.

ISSUES PRESENTED FOR REVIEW

Once the Trial Court was satisfied that John King proved that he was 1,500 miles away from Lake Charles, Louisiana at the time the Notary, Renee Amos, allegedly notarized a document transferring his Chevrolet to Charmaine Colston, did the burden of proof shift back to the Notary to show she was not negligent in identifying the person who signed the title transfer?

Did the Notary meet the burden of proof to show she was not negligent in executing a title transfer to Charmaine Colston when the owner, John King, was not present?

SUMMARY OF ARGUMENT

Once the plaintiff proved that he was in New York State or New Jersey on September 7, 2021, at the time the Notary, defendant Renee Amos, allegedly notarized his signature to a title transfer selling King's Chevrolet to Charmaine Colston for $100, the burden of proof should have shifted to defendant, Notary, to exculpate herself from presumed negligence or co-conspiracy with Colston in the transaction.

The Notary's claim that she "always checks ID's" but does not keep copies of the ID's and does not remember the incident on September 7, 2021, failed to absolve her of responsibility for executing a transfer when the owner was not present. The Notary and her bonding company should be held liable for the damages to the extent of the bond ($10,000.00).

III. MEMORANDUM OF LAW

IS A NOTARY LIABLE FOR FAILING TO IDENTIFY THE SELLER IN A BILL OF SALE? YES!

See Collins v. Collins, No. 93-CA-518. (Court of Appeal of Louisiana, Fifth Circuit. Dec. 15, 1993. Rehearing Denied Jan. 18, 1994. 629 So.2d 1274:

"In **Webb v. Pioneer Bank & Trust Co., 530 So.2d 115 (2nd Cir.1988)**, the court held that a wife was entitled to damages against her husband who had caused her signature to be forged on a mortgage affecting community property. Clearly, in the instant case, plaintiff Collins' petition stated a cause of action against his ex-wife for the sale of community property without his concurrence. ...

As to stating a cause of action against the notary, the law is clear that a notary is liable both for deliberate misfeasance in the course of his official duties, and for negligence in performing those duties.

In Summers Brothers, Inc. v. Brewer, 420 So.2d 197 (1st Cir. 1982) the court upheld a judgment against a notary who notarized a document containing forged signatures. The court said at page 204:

"Even if Mills did not know that the signatures on the contract were forgeries, he knew that by authenticating the document, as notary, he was telling the world that the parties had appeared before him and affixed their signatures in his presence. Thus, he committed fraud in that he purposely let third parties rely on a document purporting to be genuine but actually without validity as an authentic act. The 'proof' of validity he supplied was misleading to all who relied on the contract."

The court also recognized that a notary was liable for deliberate misfeasance occurring during the course of his official notarial duties.

In Webb, supra, the court found that the notary who notarized the note in the mortgage but could not recall whether the wife's signature was affixed in his presence was negligent for failing to exercise ordinary care in ascertaining the genuineness of the signature allegedly fixed in his presence, citing LSA- R.S. 35:2 and R.S. 35:198.

The court in Levy v. Western Casualty & Surety Co., 43 So.2d 291 (2nd Cir.1949) recognized that under certain circumstances, a notary could be negligent for failing to get proof of identification from a person signing a document in his presence.

Considering the above jurisprudence, we find it clear that plaintiff's petition stated a cause of action against both defendants Juanita Eskew Collins and notary Leonard J. Cline. Therefore, the exception of no cause of action must be overruled."

The Trial Court erroneously applied the burden of proof: after plaintiff proved he was out of state at the time the Notary allegedly notarized his signature to the title transfer, the burden of proof should have shifted back to the Notary to prove she properly identified the person who signed as if he were John Clifford King.

THE BURDEN OF PROOF SHIFTS TO DEFENDANT:

Once the plaintiff has established a prima facie case, the burden of proof shifts to the defendant to attempt to exculpate herself. In this case, defendant relied on her lack of memory and a claim that she always checks IDs.

Plaintiff proved at trial that he was not in the State of Louisiana at the time the Notary, Renee Amos, executed the transfer of the vehicle on behalf of Charmaine Colston. Therefore, the burden of proof shifted to the defendant Notary to explain how she notarized a bill of sale when the seller was not in her presence and in fact was approximately 1,500 miles away.

Louisiana courts have shifted the burden to defendants in numerous instances once plaintiffs have established basic facts.

For instance, see Lawrence V. Government Employees Insurance Company, La. Court of Appeal, 4th Cir, No. 2013-CA-1296, 10-14-2014), 151 So.3d 917, in which the Court stated:

The normal burden of proof in a personal injury case is upon the plaintiff. However, in exceptional cases when a plaintiff-motorist is without fault (such as when he is in his own lane and is struck head-on by an

oncoming motorist, as in Simon v. Ford Motor Co.,282 So.2d 126 (La.1973)), "the (defendant) driver is required to exculpate himself of any fault, however slight, contributing to the accident." Simon v. Ford Motor Co., 282 So.2d 126, 133. Simon v. Ford Motor Co., supra, followed the rationale of Rizley v. Cutrer, 232 La. 655, 95 So.2d 139 (1957), ...

[66] ... In Loescher v. Parr, 324 So.2d 441 (La.1975), we examined the principle of fault in Louisiana covered by Civil Code articles 2315-2322. There it was found that delictual responsibility did not necessarily depend upon negligent acts, but upon fault, and that the owner or custodian of an instrumentality which causes unreasonable risk of injury to others is at fault. Turner v. Bucher, 308 So.2d 270 (La. 1975); Holland v. Buckley, 305 So.2d 113 (La.1974). Once the injured person proves damages from an unreasonable risk of harm to others of the offending instrumentality, "the owner or guardian responsible for the person or thing can escape liability only if he shows the harm was caused by the fault of the victim, by the fault of a third person, or by an irresistible force." Loescher v. Parr, 324 So.2d 441, 447.

Arceneaux v. Domingue, No. 62446. (Supreme Court of Louisiana, Dec. 15, 1978; Rehearing Denied Jan. 26, 1979), 365 So.2d 1330

This incident is similar in that John Clifford King showed he was without fault (He was not in the State of Louisiana at the time the Notary claimed to be notarizing his signature to a bill of sale.). Therefore, the burden of proof shifted to the Notary to prove she was without fault. Mere

reliance on "I don't recall" or "I always get identification, but I did not keep copies." Is an inadequate defense.

Once John Clifford King proved he was not in the state of Louisiana on September 7, 2021, the burden of proof should have shifted to the Notary, Renee Amos, to prove she was not negligent in performing her notarial duties, including identifying the person (if any) whom she claimed signed the Bill of Sale as "John Clifford King". Mrs. Amos was unable to do so. Instead, Ms. Amos relied on her inability to recall the circumstances and her claim that she "always has the parties identify themselves". This

defense rings hollow when it is shown that John Clifford King was 1,500 miles away at the time she claims he appeared before her to sign the title.

The Trial Court erred in faulting plaintiff for not calling Charmaine Colston as a witness since she is the perpetrator who stole

the vehicle; either party could have subpoenaed Colston; the Notary could have Third-partied Colston; but this does not diminish the Notary's fault.

The trial court [Record Vol. IV., PP. 759 (Transcript p. 113)] ruled that without Charmaine Colston present to testify the Court could not find the defendant Notary at fault. The Court placed responsibility on plaintiff, John C. King, for not subpoenaing Charmaine Colston to be present to testify. Counsel confesses to watching many television episodes of Perry Mason and finding that upon Mason asking deep questions such as "What is your name?" the culprit who has acted deceptively, cunningly, and illegally up to that point suddenly becomes overwhelmingly remorseful and admits to having done the illegal act, absolving Perry Mason's client. However, undersigned counsel does not profess to be as good an attorney as Perry Mason was on his television episodes. The undersigned counsel would have expected Charmaine Colson to continue whatever subterfuge she had engaged in to obtain title to the car unlawfully. Counsel for plaintiff would not consider it reasonable to ask the conspirator or perpetrator to confess the

evil she had carried out; so why subpoena the thief to hope for a full confession?

Furthermore, the defendant, Rene Amos, had an equal right to subpoena Charmaine Colston to testify. Had defendant subpoenaed Colston, Colston could have testified to the specifics of how she carried out the fraud: Possible scenarios: (1) She had someone else sign the back of the title and presented it to Amos to notarize, or (2) She had a co-conspirator appear with a fake i.d. to sign in front of Amos; or (3) some other scenario. [Under each of these scenarios, the Notary would be at least negligent for notarizing the transfer without properly identifying the seller.]

Or maybe Colston would have testified that John Clifford King was present and signed the title in the presence of Renee Amos. But we know that John Clifford King did NOT appear before Renee Amos on 9-07-2021 and did not sign the title transfer. In fact, Mr. King did not know he had

lost the vehicle to Colston because he continued paying the insurance on it for almost another year until he learned it had been stolen and sold by Colston. [Record Vol. III, P. 708 (Trial transcript pp 61-63)]. So what did plaintiff have to gain by subpoenaing Colston to testify for plaintiff? In fact, if counsel for plaintiff had subpoenaed Colston to appear, he would have had to ask the Court to treat her testimony as that of an adverse witness, he could not rely on whatever she might say. Colston's absence from the proceeding was really not a factor. Under any scenario, the Notary was either part of the fraud or at least negligent in notarizing the transfer since John King was not present.

STANDARD OF REVIEW: De Novo. The trial court applied the incorrect burden of proof. There were no credibility issues.

"Generally, an appellate court may not set aside a trial court's findings of fact in the absence of "manifest error" or unless it is "clearly wrong." Rosell v. ESCO, 549 So.2d 840, 844 (La. 1989). However, if a legal error by the trial court interdicts the fact-finding process, the manifest error standard of review is no longer applicable, and, if the record is otherwise complete, the appellate court should conduct an independent de novo review of the record. Chambers v. Village of Moreauville, 11-898 (La. 1/24/12), 85 So.3d 593, 597. A legal error occurs when a trial court applies incorrect principles of law. Such errors are prejudicial when they materially affect the outcome of a matter and deprive a party of substantial rights. Chambers, 85 So.3d at 597. The failure of a trial court to apply a heightened burden of proof when required by law to do so is a prejudicial legal error that vitiates a trial court's factual findings, because the error skews the trial court's findings. See In re Succession of Jones, 08-1088 (La. App. 3d Cir. 3/4/09), 6 So.3d 331, 336. Accordingly, because the trial court committed legal error in not applying the heightened burden of proof applicable in this case, we will now conduct a de novo review of this matter." Estate of Robert E. Riggs v. Way-Jo, L.L.C; Sarah M. Kent vs. The Succession of Robert E. Riggs and Way-Jo, L.L.C.; 2011 CA 1651; 2011 CA 1652; State of Louisiana, Court of Appeal First Circuit; December 28, 2012, Not designated for publication.

ARGUMENT:

There were no credibility determinations in this case that the Court relied upon. The trial court found the testimony of all witnesses credible.

The Court simply applied the wrong burden of proof.

Once the Court was satisfied by the testimony that Mr. King was not present at the transaction on September 7, 2021 when the Notary, Renee Amos purportedly notarized his signature on a car title transfer; and, in fact, the Court found that Mr. King was out of the state of Louisiana (in New Jersey or New York), and that Mr. King could not have physically been present in Louisiana [Record pp. 755-756 (Transcript pp. 109-110)], the burden of proof should have shifted back to Renee Amos, to show that her

"procedures" were actually followed on September 7, 2021. Amos' claim that "my practice is to check the ID's of all parties, the buyer and the seller." [Record Vol. III, p. 665] is inadequate when compared to the fact that Mr. King was not present. Was Ms. Amos negligent in comparing the identification cards? Dis Ms. Amos err in checking the names or the photos? Ms. Amos should have produced a copy of the ID's used on September 7, 2021, or she should be held liable for the consequences of the

fraudulent transaction.

Renee Amos did not know Mr. King and would not have recognized him except for seeing him in Court in multiple proceedings. [Record Vol. III P. 666 (Transcript pp. 20-21)]. Ms. Amos had no memory of what happened on September 7, 2021. [Record Vol. III, P. 668 (Transcript p. 22, lines 11-12)]. Ms. Amos could not recall whether the alleged $100 consideration was paid or, if it was paid, in what manner it was paid [Record Vol. III, PP. 668-669 (Transcript p. 22, line 24 - p. 23, line 8)]. Ms. Amos did not keep a copy of the driver's license of the person she claimed signed the title transfer that day "because of the massive amount of people I see in a day, I could not possibly keep those records." [Record Vol. III, P. 669 (Transcript p. 23, lines 18-20)].

Renee Amos signed as Notary attesting that Mr. King appeared before her when he was in fact 1,500 miles away. There was obviously a flaw in her procedures. The burden should have fallen on Renee Amos to extricate

herself from liability. Mr. King proved he was not present.

CONCLUSION and PRAYER

The Court has before it all the facts and testimony from trial. The Court of Appeal should reverse the lower court judgment and render judgment in favor of plaintiff, John Clifford King, and against defendants, Renee Amos and her bonding insurer, Hartford, in the amount of the Notary bond, $10,000.00, plus all costs of court and this appeal.

Respectfully submitted by Attorney for Applicant, JOHN CLIFFORD J. KING and his attorney, Oliver Schrumpf

Oliver Schrempf

OLIVER "JACKSON" SCHRUMPF, Appeal Counsel
Bar Roll No. 11832
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
e-mail: oschrumpf@schrumpf-law.com

CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing Application for Writ of

Review and for Stay has been served on the presiding trial judge and all opposing counsel, by depositing a copy in the U.S. Mail, postage prepaid, properly addressed to all counsel, and to the Third Circuit Court of Appeal, to wit:

Third Circuit Court of Appeal Judges
1000 Main Street
Lake Charles, Louisiana 70615
P.O. Box 16577
Lake Charles, Louisiana 70616
Telephone: 337-433-9403
Fax: 337-491-2590

Ed Bauman
940 Ryan Street
Lake Charles, La. 70601
P.O. Box 1641
Lake Charles, La 70602
Telephone: 337-491-0570
Fax: 337-491-0593

by Hand Delivery

Via e-mail: ed@lakecharlesattorney.com

Counsel for Defendants, Renee Amos and Hartford Fire Insurance Co.

Judge RON RICHARD

ron@lccitycourt.org

Judge, Ward 3/Lake Charles City Court

118 W. Mill Street, 2nd Floor

Lake Charles, La 70601

Telephone: 337-491-1305

Fax: 337-491-8676

Thus done at Sulphur, La. This 20th day of February, 2025.

Oliver

Schrump

OLIVER "JACKSON" SCHRUMPF

MinuteID: **1869063**

STATE OF LOUISIANA, PARISH OF CALCASIEU CITY COURT OF LAKE CHARLES

NOTICE OF JUDGMENT

JOHN CLIFFORD **J KING**

Vs. No.

23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID**# 2937**

You are hereby notified that a:

TO: John Clifford J King

Thru: Attorney Oliver Jackson Schrumpf

3801 Maplewood Drive

SULPHUR, Louisiana

of said Parish Calcasieu

has been filed on

11/19/2024

JUDGMENT

and signed by Judge **Judge Richard**

.on

11/21/2024

in the above numbered **and** entitled cause as **per** certified copy **attached** heret

Witness the HONORABLE JAMIE B. BICE RONALD C. RICHARD, **Judges of said Court,**

this

21

day of

November

2024

май

TRUE COPY

Deputy **Clerk** of

Court

23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD **III**

STATE OF LOUISIANA

I hereby certify that Notice of Judgment was mailed to the **plaintiff, John Clifford** J **King** through attorney Oliver Jackson Schrumpf and to defendant**,** Renee Amos **through** attorney Kamie T. Dominic this **21st** day of November 2024**.**

Маккий

CLERK

Ronald C. Richard

Appendix
Page 1

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JOHN CLIFFORD J KING

:

LAKE CHARLES CITY COURT

VS. NO. 23-2124

:

PARISH OF CALCASIEU

RENEE AMOS
NOTARY PUBLIC

:

STATE OF LOUISIANA

NOTARY ID #29374

FILED:

11-19-2014

JUDGMENT

Maliki

DEPUTY CLERK OF COURT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, and his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing this matter and for reasons orally assigned, entered the following judgment:

IT **IS HEREBY ORDERED**, ADJUDGED **AND** DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT

2024, in Lake Charles, Calcasieu

READ and SIGNED this *21st* day of November *20*

Parish, Louisiana.

RON RICHARD, JUDGE DIVISION B JUDGE, LAKE CHARLES CITY COURT

Ronald C. Richard

Appendix

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11-21-2004

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Suit No. 23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a certified copy of the Motion and Order for Devolutive Appeal signed by Judge Ronald C. Richard has this 3rd day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

CLERK

Appendix

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RECD LC CITY COLAY CU
*24 DEC
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11:35

JOHN CLIFFORD J KING
:
WARD 3/LAKE CHARLES CITY COURT

VERSUS NO. 2023-2124
:
PARISH OF CALCASIEU

RENEE AMOS NOTARY PUBLIC
ID # 29374
:
STATE OF LOUISIANA

FILED:
122-2034
:
DEPUTY CLERK OF COURT

MOTI
MOTION AND ORDER FOR DEVOLUTIVE APPEAL

ON MOTION OF Oliver "Jackson" Schrumpf, counsel *for* John Clifford J King, plaintiff herein, for a devolutive appeal from the judgment rendered November 14, 2024, read and signed November 21, 2024, notice of which was mailed November 21, 2024, and from the judgment ("Ruling") denying plaintiff's claims against Renee Amos.

IT IS ORDERED that a devolutive appeal be and *is* hereby granted to John Clifford J King

and that the appeal be returnable to the Court of Appeal, Third Circuit, State of Louisiana, at

Lake

Charles, Louisiana, upon payment of costs in accordance with law.

SO ORDERED this 3rd day of

Decenatur

Calcasieu Parish, Louisiana.

Decenti

or

2024, in Lake Charles,

Prepared by:

JUDGE RON RICHARD

BY:

Oliver

Schrumpf

OLIVER "JACKSON" SCHRUMPF #11832
SCHRUMPF LAW OFFICE,
A Professional Law

Corporation
3801 Maplewood Drive
Sulphur, Louisiana
70663
(337) 625-9077; Fax (337) 625-8231
oschrumpf@schrumpf-law.com

Ronald C. Richard

12-3-2034

Appendix
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JOHN CLIFFORD J KING

VS.

RENEE AMOS NOTARY PUBLIC

NOTARY ID# 29374

TO:

NOTICE OF APPEAL
CIVIL CASE

JAMIS Control No.

Case No.
23-2124

Parish of CALCASIEU

State of LOUISIANA

OLIVER SCHRUMPF
SCHRUMPF LAW OFFICE, APLC
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

Division CIVIL

RONALD C. RICHARD
Presiding Judge

REBECCA BERKEN/KAREY BANG Court Reporter

TWO HOURS (2)
Estimated Hours of Testimony Taken

NOTICE is hereby given that on DECEMBER 2, 2024 upon motion of JOHN CLIFFORD J KING, PLAINTIFF (Give appellant's proper name and designate whether he or she is plaintiff, defendant, or intervenor, etc.), an order of appeal was entered on DECEMBER 3, 2024, granting an appeal from judgment of NOVEMBER 14, 2024, returnable to the COURT OF APPEAL, 3rd Circuit, 45 days from when costs. are paid.

The appeal taken
was:

[ ] Suspensive Bond **$**

According to
Law_

[X] Devolutive Bond set at $

[ ] In Forma Pauperis

[ ] Act La. R.S. 13:4521 & 13:4581

I certify that the foregoing notice was this day mailed by me in accordance with Article 2121, La. C.C.P.

LAKE CHARLES, Louisiana, this the___20TH day of DECEMBER, 2024.

Kareen bang

DEPUTY CLERK OF COURT

ATTENTION: Under Article 2126, La. C.C.P., all estimated costs of the appeal must be paid to the Clerk. within 20 days.

EXTENSION OF RETURN DAY GRANTED BY THE TRIAL COURT

The return day was extended
from

Order Signed by

Reason for Extension:

to

Date Signed:

I certify that the foregoing extension notice was this day mailed by me in accordance with Article 2125, La. C.C.P.,

Louisiana, this the

day *of*

DEPUTY CLERK OF COURT

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seated. We have everybody here? All right. All right, uh, in the matter of John Clifford King, Jr., number 2023-2124

MR. SCHRUMPF:

Senior.

THE COURT:

Oh, senior. Sorry. Versus Renee Amos, this matter came to trial today. The Court has heard from all witnesses, uh, all counsel have had the opportunity to present their case and the Court finds as follows. The burden of proof in a matter of this nature rests, of course, on plaintiff to prove by a preponderance of the evidence that indeed what they claim occurred, occurred. And in this matter, the claim was that Ms. Amos failed to, uh, one (1) committed fraud in allowing someone to commit a transfer of title of a vehicle, uh, without the proper party being present. There were some

allegations of forged signature, allegations of negligence, etcetera made. The Court finds, uh, however that the evidence showed as follows. One (1), the Court finds that Mr. King was indeed apparently in New York and New Jersey on September 7th of 2021. That he was

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indeed not in Lake Charles. His testimony and his wife's testimony, uh, is irrefuted and

undisputed that that's indeed where they were.

The Court finds as a matter of fact that he is

not, uh, Flash from Marvel Heros, and cannot

quickly proceed somehow from that far away from

to Lake Charles, execute a title, execute

a transfer, and then go back. I find basically

that his testimony is the Gospel truth. That

he got up that day. He went and worked out,

got a smoothie, went to his job and, uh, spent

the

evening

apparently

celebrating

the upcoming nuptials with his bride. I find, uh, Mrs. King testified to the same. They got up that day. They were in New York and New Jersey and he was not in Lake Charles. On the other hand, I find that, uh, Ms. Amos' testimony, uh, is also undisputed. Mr. King freely admits he wasn't there. He don't know what happened in her home whenever the transfer of the document ... on the document was, uh, occurred. And her testimony is that she, uh, was contacted; that Ms. Colston and, uh, some man

came, showed IDs. She verified their IDs. She notarized their signatures and that's the

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extent of it. She does not have a truly independent recollection of exactly what

everybody looked like but she testified that it is her custom and practice to require that everyone show her an ID. She verifies it and

if anything is "fishy" in the sense that if

that someone doesn't have an ID or the ID is

uh, doesn't match, OI if there's obviously, uh,

already a signature on a document that she did

not witness, she contacts the Justice of the

Peace regarding the matter. Her testimony. is

this is indeed how

indeed how she's done for, I can't

remember, I think she said twenty (20)

something years. I don't know. A long time.

Not trying to make you older than you are, Ms.

Amos.

MS. AMOS:

Thank you.

THE COURT:

But, she was very, very adamant in

that she does not deviate from her practice.

She does not recall, sitting here today, if it

was Mr. King or not and has no reason to argue that it was ... could indeed have been someone else utilizing a fake ID. The Court

the

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one (1) missing link that that the Court really needed so that the Court can make a

a decision here is Ms. Colston.

missing link,

a

She's the

to speak. Ms. Colston isn't

here to testify. Seems to me,

she'd of been

the one. You get her in here. You put her on

the stand. Who went with you? Who was there?

What happened? I find it of no moment that a

Notary who does, I think you know, she

testified thousands of these things over the

years, that a Notary who does this doesn't

specifically remember everything about a

particular deal. They just know their

protocol. Ms. Colston, however, this would be

a rather significant and unique event in her

life and, uh, she would be the party who would

be best situated to tell us what in the world

happened that day, who was with her, uh, etcetera. All right? So it's one of those cases where the Court doesn't have to think that a plaintiff is the only one telling the truth, or the defendant is the only one telling the truth, uh, it's one of those one of those cases where the Court can find that I believe everybody's telling the Gospel truth in here today. I think

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Pq

Mr. King wasn't lying about where he he was. I think Ms. Amos isn't lying about what her protocol is and that two (2) people showed up, a man and a woman. She checked their IDs, uh, and executed the documents. If Ms. Colston was here, I think that's the one we'd have to decide or we'd be calling her the proverbial liar, liar, pants on fire or not, okay? That all having been the case, uh, the Court finds that let me grab the pleadings. The Court finds that the plaintiff has failed to prove by a preponderance evi of the evidence that defendant undertook to provide illegal notarial services to Charmaine Colston, intentionally notarizing a false title transfer and a false bill of sale for the

subjects in this matter. Additionally, the Court finds that plaintiff failed to prove by a preponderance of the evidence

preponderance of the evidence that defendant failed, uh, to exercise whatever professional notarial powers and evaluation ·skill that needed to be done in executing this matter. In short, the Court finds that plaintiff failed to prove by a preponderance of the evidence

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that, uh, defendant Amos did anything

incorrect in processing this matter and the Court finds that her explanation of what occurred to be reasonable and that indeed, Ms. Colston's testimony could have swayed the Court one way or the other. That being the case, judgment in favor of defendant. Costs of court awarded to defendant and that is the

judgment in this matter. Ms. Dominic, Dominic, please prepare a judgment and circulate same in this matter. Counsel, any questions?

MR. SCHRUMPF:

No. I just want to make sure all of the offerings were proffered.

THE COURT:

All ali offerings were proffered.

MR. SCHRUMPF:

Whatever wasn't admitted into evidence is proffered.

THE COURT:

Yes. All is proffered. And I and

I'll speak to that quite frankly. All, uh, all documents that were made by proffer that this Court did not allow to be entered into evidence, the Court believes were all moot due

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to the fact that the Court did not feel those documents were necessary to prove that Mr. King was in New York and New Jersey. In fact, Mr. King's testimony and Mrs. King's testimony were more than sufficient to convince the Court that, uh, Mr. King was indeed in New Jersey or New York on September 7th of 2021. Now, do we have any other questions from counsel?

MS. DOMINIC:

Just to, uh, clarify Your Honor. The judgment is in favor of the defendant and, uh, court costs in our favor. Correct?

THE COURT:

Yes.

MS. DOMINIC:

Thank you.

END OF TRIAL

Appendix P./.....

Re: From Judge Ronald C. Richard re: King Contempt of Court

From: True King <truekingfile@gmail.com>

To: Kay Bang <kay.bang@lccitycourt.org>

Cc: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Date: Fri, 22 Nov 2024 10:45:04 -0500

You said she could not call about case # 23-2124 or it would be “practicing law” and previously said if my case number was represented by attorney nothing could be filed or written by myself. Now you’re telling her to call and email about my case when you were contacted no one responded. This is contradictory and incurs more illegitimate fees you filed three services one to an address in Iowa La just to run up court costs? How? I’ve never owned a home in Iowa and she’s never lived there but you’re charging her for service at that address without due process? And she’s not a resident?

What is her case number so she can get info about her separate case and separate fees as it appears you have attached her fees to my case and are adding extra fees sending mail to Iowa LA and Lake Charles LA and Sulphur LA incurring service fees and charging me for them even though Mr Schrumpf me and her attorney from out of state have all made clear you cannot serve her in LA she isn’t a resident and Schrumpf isn’t her attorney .

Please remove all fees related to my wife from my case # so she can have her own counsel enroll. As of now you’re charging me for inadequate service she must be served at her domicile and served to her own attorney and she has not.

Also please assign a new case number to my contempt as a separate attorney is needed for that matter.

She had been advised by her own counsel not to deal with this matter that has proceeded without due process and unsubstantiated allegations as these actions are causing trauma and financial consequences as the flights from last week were $850 dollars and she was ordered to appear without due process no certificate of service but told if she did not appear out of jurisdiction she would be thrown and jail. There was never any hearing on practicing law and the actions caused irreparable harm to her financial position and exposure of her life and safety for placing addresses after she specifically told you there would be life threatening consequences from one of her assailants which could result in another attempted murder on her life.
At this time due to the reckless regard for her life and safety and the lack of civil rights afforded which decimated her financial resources she will be seeking protective orders from the immediate abuses that have caused unnecessary damages and threats to her life and safety.

The appearance date was November 14,2024 she appeared as a courtesy out of her jurisdiction and as a result now fears for her life and my mother must relocate because of your public disclosures of a home address associated with her name. This trauma is irreversible and in her delicate condition will be seeking protections and relief afforded to her and all civil rights protections guaranteed by her jurisdiction.

Murder and sexual assault are not games. Racial hate crimes and being shot for your skin color is not a game and it appears that this isn't about justice anymore this is about other things and I agree to leave it to her own representatives to assign an appropriate title for what is being done to her.

Please remove me and my attorney from any correspondence pertaining to my wife and her safety as Mr Scrumpf has repeatedly told the court he does not represent her and your attaching fees and demanding flights in spite of the clarification and I am formally asking that it be amended on the record.

thank you

On Fri, Nov 22, 2024 at 10:02 AM Kay Bang <kay.bang@lccitycourt.org> wrote:

> Mr. King,
>
>
>
> The Court is in receipt of your email correspondence dated November 21,
> 2024 making inquiries regarding contempt matters concerning your wife, Mrs.
> Shunte King. You are not an attorney and you do not represent her. If
> Mrs. King has any written inquiries to the Court on issues pertaining to
> her contempt matter, she must send them herself.
>
>
>
> Judge Ronald C. Richard
>
> by Kay Bang
>
> <https://www.google.com/maps/search/118+W.+Mill+Street+%0D%0A+Lake+Charles,+LA
+70601?entry=gmail&source=g>
>
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>
>
>
>
> Kay Bang
>

> Paralegal
>
> Lake Charles City Court Judges’ Office
>
> 118 W. Mill Street
> <https://www.google.com/maps/search/118+W.+Mill+Street+%0D%0A+Lake+Charles,+LA+70601?entry=gmail&source=g>
>
> Lake Charles, LA
> <https://www.google.com/maps/search/118+W.+Mill+Street+%0D%0A+Lake+Charles,+LA+70601?entry=gmail&source=g>
> 70601
> <https://www.google.com/maps/search/118+W.+Mill+Street+%0D%0A+Lake+Charles,+LA+70601?entry=gmail&source=g>
>
> 337-491-1305 office
>
> 337-491-8676 fax
>
> kay.bang@lccitycourt.org
>
>
>
>
>

RE: From Judge Ronald C. Richard re: King Contempt of Court

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: Kay Bang <kay.bang@lccitycourt.org>, truekingfile@gmail.com

Cc: KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>, Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

Date: Fri, 22 Nov 2024 10:58:54 -0600

I do not represent Mr. King nor Mrs. King regarding any alleged contempt of court matter. My representation was strictly on the claim against Renee Amos. Please remove me from further correspondence on issues of contempt.

Oliver “Jackson” Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

From: Kay Bang <kay.bang@lccitycourt.org>
Sent: Friday, November 22, 2024 9:02 AM
To: truekingfile@gmail.com
Cc: Oliver Schrumpf <oschrumpf@schrumpf-law.com>; KAMIE DOMINIC <kamiedominiclaw@gmail.com>; Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>
Subject: From Judge Ronald C. Richard re: King Contempt of Court

Mr. King,

The Court is in receipt of your email correspondence dated November 21, 2024 making inquiries regarding contempt matters concerning your wife, Mrs. Shunte King. You are not an attorney and you do not represent her. If Mrs. King has any written inquiries to the Court on issues pertaining to her contempt matter, she must send them herself.

Judge Ronald C. Richard

by Kay Bang

Kay Bang

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Lake Charles City Court Judges’ Office

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From Judge Ronald C. Richard re: King Contempt of Court

From: Kay Bang <kay.bang@lccitycourt.org>

To: "truekingfile@gmail.com" <truekingfile@gmail.com>

Cc: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Date: Fri, 22 Nov 2024 15:01:56 +0000

Mr. King,

The Court is in receipt of your email correspondence dated November 21, 2024 making inquiries regarding contempt matters concerning your wife, Mrs. Shunte King. You are not an attorney and you do not represent her. If Mrs. King has any written inquiries to the Court on issues pertaining to her contempt matter, she must send them herself.

Judge Ronald C. Richard
by Kay Bang

Kay Bang
Paralegal
Lake Charles City Court Judges' Office
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Lake Charles, LA 70601
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Suit No.: 23-2124

JOHN CLIFFORD J KING

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Cost Summary	
Deposits:	$1,793.00
Court Cost:	($1,276.70)
Refund:	$0.00
Balance:	$516.30

Date	***Minutes***			
8/24/2023	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS.	***Code:***	AC	***ServType:***
		Deposit:		
		Cost:	$0.00	***ServCost:***
8/24/2023	DEFAULT COURT COST	***Code:***	DCC	***ServType:***
		Deposit:		
		Cost:	$56.50	***ServCost:***
8/24/2023	CLAIM: DAMAGESAS PER FAX FILED PETITION (6PAGES); C/SUPPLEMENTAL REPORT(2); CPSO OFFENSE REPORT(4); CPSO CASE REPORT(4) C/WELD INSPECTION(7); C/SOUTHWEST CREDIT UNION DOCS(2); C/CAPITAL ONE(7); C/REGISTRATION(1); C/VEHICLE APPLICATION(1); CASE REPORT SUMMARY(1); C/CERTIFICATE OF TITLE(2); C/LICENSE(1); C/CASE SUMMARY(1) FILED HEREINPETITION (6PAGES) 1/CC 1/CONFEXHIBITS(33)FAX FILING FEE $5.00	***Code:***	CL	***ServType:***
		Deposit:		
		Cost:	$95.00	***ServCost:***

9/1/2023	CITATION ISSUED (RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 AT 1208 17TH STREET LAKE CHARLES LA, 70601)	***Code:***	CII	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
9/5/2023	ADDED DEPOSIT FROM JOHN KING OF $255.00 ADV DEP	***Code:***	PD	***ServType:***	
		Deposit:	$255.00		
		Cost:		***ServCost:***	
9/5/2023	2 COPIES OF THE PETITION 1 FOR SERVICE, 1 FOR PLT12 PAGES @ $2.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$24.00	***ServCost:***	
9/12/2023	DEFENDANT RENEE AMOS PEREMPTORY EXCEPTIONS OF PRESCRIPTION, RULE TO SHOW CAUSE, C/JUDGMENT OF DISMISSAL WITH PREJUDICE, C/CPSO SUPPLEMENTAL NARRATIVE /INITIAL REPORT, C/CPSO OFFENSE REPORT RECEIPT, AND C/CASE REPORT FILED HEREIN.**ORDER SIGNED BY JUDGE JAMIE B. BICE 9/13/2023**EXCEPTIONRULE1 AT $6 EACH9 AT $2 EACH1 CONFORMED COPY TO ATTY DOMINIC1 CC TO BE SERVED TO PLTF	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$44.00	***ServCost:***	
9/12/2023	ADDED DEPOSIT FROM KAMIE DOMINIC OF $150.00 ADD DEP FOR EXCEPTION	***Code:***	DD	***ServType:***	
		Deposit:	$150.00		
		Cost:		***ServCost:***	
9/20/2023	HEARING NOTICE OF EXCEPTION RULE SET FOR WEDNESDAY 11/15/2023 AT 9:00 AM MAILED TO DEFT ATTY., KAMIE T. DOMINIC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	

9/20/2023	RULE: EXCEPTION DATE: WEDNESDAY 11/15/2023 AT 9:00 AM	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	
9/20/2023	CITATION ORDER ISSUED TO: (KING, JOHN CLIFFORD J AT 123 N. LOUISIANA AVENUE LAKE CHARLES LA 70601) EXCEPTION	***Code:***	CIO	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
11/7/2023	FAX FILED MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/08/23.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
11/13/2023	RECEIVED ORIGINAL MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/16/23.MOTION/2CCDOCS/2EXHIBITS/6COPIES/18	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$76.00	***ServCost:***	
11/13/2023	CC / JOHN KINGADD DEP / FOR MOTIONS TO CONTINUE AND QUASH	***Code:***	PD	***ServType:***	
		Deposit:	$255.00		
		Cost:		***ServCost:***	
11/28/2023	HEARING NOTICE FOR EXCEPTION SET FOR WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM MAILED TO DEFENDANT, RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC.	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
11/28/2023	NOTICE OF MOTION FOR CONTINUANCE AND MOTION TO QUASH ISSUED TO: RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC AT 1400 RYAN ST., LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00

11/28/2023	RULE REFIXED: EXCEPTIONDATE: WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	
11/28/2023	CITATION ORDER ISSUED TO WITH C/MOTION FOR CONTINUANCE AND MOTION TO QUASH: JOHN CLIFFORD J KING AT 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601	***Code:***	CIO	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/4/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/5/2024	CC / JOHN KINGADD DEP / FOR FAX FILING FEE AND SUBPOENA	***Code:***	PD	***ServType:***	
		Deposit:	$55.00		
		Cost:		***ServCost:***	
1/5/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	***Code:***	SUB	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/16/2024	FAX FILED - MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	RULE: EXCEPTION (RE-FIXED)DATE: THURSDAY, JANUARY 25, 2024 @ 9:00 AM**2 NOTICES MAILED**	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	

1/17/2024	PLTF FAILS TO APPEAR; DEFT APPEARS W/ATTY; MOTION TO CONTINUE GRANTED; CONTINUED UNTIL 1/25/2024 @ 9:00 AM; NOTICE TO BE SENT TO BOTH PARTIES. RCR	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
1/17/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	***Code:***	SUB	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/19/2024	REQUEST FOR A COPY OF THE EXCEPTIONS FILED HEREIN BY DEF ATTY KAMIE T DOMINIC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
1/19/2024	1 COPY OF DEFENDANT PEREMPTORY EXECEPTIONS OF PRESCRIPTION4 PAGES @ $2.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	

1/19/2024	ADDED DEPOSIT FROM KAMIE T. DONINIC OF $14.00 ADD DEP/CF OF PEREMPTORY EXECEPTIONS	***Code:***	DD	***ServType:***	
		Deposit:	$14.00		
		Cost:		***ServCost:***	
1/22/2024	ADDED DEPOSIT FROM JOHN KING OF $80.00 /SUBPOENA	***Code:***	PD	***ServType:***	
		Deposit:	$80.00		
		Cost:		***ServCost:***	
1/22/2024	RECEIVED ORIGINAL LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.REQUESTDOC/1EXHIBIT/1	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$14.00	***ServCost:***	
1/23/2024	RECEIVED ORIGINAL MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE. **SIGNED BY JUDGE ** EXHIBIT ATTACHED (3 PAGES)MOTION/ORDEREXH - 3 PAGES	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$18.00	***ServCost:***	
1/23/2024	LETTER TO CONTEST COURT FEES FOR JANUARY 17, 2024 FILED HEREIN BY PLTF **BUT NOT SIGNED**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
1/24/2024	FAXED LETTER FILED HEREIN BY ATTY ORELIA R. LAWDINS-TRENT INFORMING THE COURT OF THE RECEIVED SERVICE OF A SUBP (ISSUED AT PLTF REQUEST) FOR CHARMAINE Y. COLSTON, AS THEY DO NOT REPRESENT MS. COLSTON IN THIS MATTER & SHE IS NOT A PARTY TO THIS PROCEEDING; SINCE OFFICE IMPROPERLY SERVED, HAS NOT FORWARDED TO MS. COLSTON; ADDITIONALLY CANNOT ASSUME ANY RESPONSIBILITY FOR HER APPEARANCE OR REQUIRE HER PRESENCE AT ANY HEARINGS IN THIS MATTER	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	

1/25/2024	PLTF APPEARS THRU ATTY, DUSTAN ABSHIRE; DEFT APPEARS WITH ATTY, KAMIE DOMINIC; PRE-TRIAL CONFERENCE HELD; DUSTAN ABSHIRE APPEARS TODAY FOR THE LIMITED PURPOSE OF THIS EXCEPTION HEARING; ARGUMENT AND INFORMATION GIVEN; EXCEPTION REQUEST IS OVERRULED; OBJECTION TO RULING NOTED FOR THE RECORD; MATTER SET FOR TRIAL ON THURSDAY, MARCH 21, 2024 AT 9:00 AM; NOTICE GIVEN IN OPEN COURT AND TO BE MAILED. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $7.00	***ServType:*** ***ServCost:***	
2/7/2024	NOTICE OF ANSWER FILED HEREIN BY DEFENDANT RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 ISSUED TO PLTF JOHN KING, 123 N LOUISIANA AVENUE, LAKE CHARLES, LA 70601	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00	***ServType:*** MF3 ***ServCost:***	$30.00	
2/7/2024	ANSWER FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; FAX: 337-426-8763; *CERTIFICATE OF SERVICE*ANSWER (2 PAGES)/1CC	***Code:*** JF ***Deposit:*** ***Cost:*** $13.00	***ServType:*** ***ServCost:***		
2/8/2024	ADDED DEPOSIT FROM KAMIE DOMINIC FOR ANSWER OF $25.00	***Code:*** DD ***Deposit:*** $25.00 ***Cost:***	***ServType:*** ***ServCost:***		
2/23/2024	REQUEST FOR CERTIFIED COPIES RECEIVED BY CHARMAINE COLSTON. **NOTIFIED COST FOR CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00 PLUS REQ. $6.00 TOTAL AMT. REQUIRED - $29.00**	***Code:*** NO ***Deposit:*** ***Cost:*** $0.00	***ServType:*** ***ServCost:***		
2/27/2024	REQUEST FOR CERTIFIED COPIES FILED HEREIN BY CHARMAINE COLSTON.	***Code:*** JF ***Deposit:*** ***Cost:*** $6.00	***ServType:*** ***ServCost:***		

2/27/2024	CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$23.00	***ServCost:***	
2/27/2024	ADDED DEPOSIT FROM CREDIT CARD/CHARMAINE COLSTON FOR CERTIFIED COPIES OF $29.00	***Code:***	TPD	***ServType:***	
		Deposit:	$29.00		
		Cost:		***ServCost:***	
3/7/2024	TRIAL FIXED FOR THURSDAY, MARCH 21, 2024 @ 9:00 AM; 2 NOTICES MAILED.	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	
3/7/2024	FAX FILED - REQUEST FOR SUBPOENA W/ATTACHED WITNESS SUBP. ACKNOWLEDGEMENT FORM FILED HEREIN BY PLTF IN PROPER PERSON. **REQUEST TO SERVE ATTY ORELIA LAWDINS-TRENT C/O HER CLIENT CHARMAINE COLSTON, LAWDINS GALLIEN FIRM, 1504 MARTIN LUTHER KING HWY STE A, LAKE CHARLES, LA 70601**FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$7.36	***ServCost:***	
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$7.36	***ServCost:***	

3/11/2024	**PER JUDGE RICHARD - DISREGARD PLTFS REQUEST FOR SUBP TO BE SERVED TO ATTY ORELIA LAWDINS TRENT C/O HER CLIENT CHARMAINE Y. COLSTON - REFER TO ATTY ORELIA LAWDINS-TRENTS LETTER FILED INTO THE RECORD ON 1/24/2024 WHEREIN SHE ADVISED THE COURT SHE IS NOT THE ATTY OF RECORD FOR MS. COLSTON, AS SHE IS NOT A PARTY IN THIS MATTER**	***Code:*** NO ***Deposit:*** ***Cost:*** $0.00	***ServType:*** ***ServCost:***	
3/19/2024	MOTION TO CONTINUE (2 PAGES); ORDER TO REFIX TRIAL FILED HEREIN BY DEFT THRU ATTY KAMIE T. DOMINIC **PLTF OPPOSES**MOTION (2 PAGES)/ORDER/2CC	***Code:*** JF ***Deposit:*** ***Cost:*** $24.00	***ServType:*** ***ServCost:***		
3/19/2024	ADDED DEPOSIT FROM KAMIE TRAMAIN DOMINIC OF $100.00	***Code:*** DD ***Deposit:*** $100.00 ***Cost:***	***ServType:*** ***ServCost:***		
3/21/2024	TRIAL RE-FIXED DATE: WEDNESDAY, MAY 8, 2024 AT 9:00**NOTICE GIVEN IN OPEN COURT***	***Code:*** JF ***Deposit:*** ***Cost:*** $8.00	***ServType:*** ***ServCost:***		
3/21/2024	PLTF APPEARS W/ATTY DUSTAN ABSHIRE; DEFT APPEARS W/ATTYS KAMIE DOMINIC & ED BAUMAN; FTR, OBJECTION TO THE MOTION TO CONTINUE BY PLTF ATTY DUSTAN ABSHIRE, REQUEST DENIED; MOTION TO CONTINUE BY DEFT ATTY KAMIE DOMINIC GRANTED & SIGNED IN OPEN COURT; TRIAL SET FOR WEDNESDAY, MAY 8, 2024 AT 9:00 AM; PLTF ATTY REQUESTS ZOOM COURT FOR MR. KING, REQUEST DENIED; NOTICE GIVEN TO ALL PARTIES IN OPEN COURT. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $5.00	***ServType:*** ***ServCost:***		
3/25/2024	NOTICE OF MOTION & ORDER TO CONTINUE & REFIX TRIAL ISSUED TO: (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00	***ServType:*** MF3 ***ServCost:***	$30.00	

4/25/2024	MOTION TO RECONSIDER DEFENDANT RENEE AMOS PEREMPTORY EXCEPTION OF PRESCRIPTION; MEMORANDUM IN SUPPORT OF MOTION TO RECONSIDER DEFT PEREMPTORY EXCEPTION (3 PAGES); EXH A (2 PAGES) FILED HEREIN BY DEFT THRU ATTY KAMIE DOMINIC.MOTION/MEMO (3 PAGES)/CC1 EXH (2 PAGES)	***Code:*** JF ***Deposit:*** ***Cost:*** $25.00		***ServType:*** ***ServCost:***	
4/25/2024	NOTICE OF MOTION TO RECONSIDER DEFENDANTS PEREMPTORY EXCEPTION OF PRESCRIPTION ISSUED TO (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00		***ServType:*** MF3 ***ServCost:***	$30.00
4/25/2024	ADDED DEPOSIT FROM CREDIT CARD/KAMIE TRAMAIN DOMINIC FOR MOTION TO RECONSIDER DEFT EXCEPTION OF $100.00	***Code:*** DD ***Deposit:*** $100.00 ***Cost:***		***ServType:*** ***ServCost:***	
5/8/2024	PLTF APPEARS W/ATTY JOHN CLIFFORD J. KING; DEFT APPEARS W/ATY KAMIE DOMINIC; COURT GRANTS PLAINTIFF'S ORAL MOTION TO RESET HEARING AND TO AMEND PLEADINGS TO INCLUDE HARTFORD LIFE INSURANCE COMPANY; MATTER RE-FIXED UNTIL THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; NOTICES TO BE SENT TO ALL PARTIES. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $5.00		***ServType:*** ***ServCost:***	
5/15/2024	TRIAL RE-FIXED FOR THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; 2 NOTICES MAILED.	***Code:*** JF ***Deposit:*** ***Cost:*** $8.00		***ServType:*** ***ServCost:***	
5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY DUSTAN J. ABSHIRE, 334 KIRBY ST. LAKE CHARLES, LA 70601	***Code:*** PC ***Deposit:*** ***Cost:*** $5.04		***ServType:*** ***ServCost:***	

5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$5.04	***ServCost:***	
5/20/2024	FAX FILED - PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTFFAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
5/30/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $5.00	***Code:***	PD	***ServType:***	
		Deposit:	$5.00		
		Cost:		***ServCost:***	
5/31/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTF **UP FOR REVIEW ** DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/4/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD. CC TO PLTF ATTY DUSTAN ABSHIRE.	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
6/13/2024	SUPPLEMENTING PETITION (2 PAGES); ORDER; AFFIDAVIT AND COVER LETTER FILED HEREINPETITION (2 PAGES)/3CCDOCS/3	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$41.00	***ServCost:***	
6/13/2024	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS. **AMENDING PARAGRAPH 2 AND ADD DEFENDANT HARTFORD FIRE INSURANCE COMPANY**	***Code:***	AC	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	

6/13/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM OF $300.00 ADD DEP FOR SUPPLEMENTAL PETITION	***Code:***	PD	***ServType:***	
		Deposit:	$300.00		
		Cost:		***ServCost:***	
6/14/2024	CHECK REQUEST ID# 21090 FOR PREPAYMENT SERVICE FEE SUBMITTED TO COMPTROLLER	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (RENEE AMOS THRU ATTY: KAMIE T. DOMINIC AT 1400 RYAN ST. LAKE CHARLES LA, 70601)	***Code:***	CII	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (HARTFORD FIRE INSURANCE COMPANY THRU: LOUISIANA SECRETARY OF STATE AT 8585 ARCHIVES AVE BATON ROUGE LA, 70809)**MAILED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE** CK. NO. 038877 ISSUED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE	***Code:***	CII	***ServType:***	SF
		Deposit:			
		Cost:	$10.00	***ServCost:***	$40.40
6/17/2024	PREPAYMENT OF SERVICE FEE. CHECK #038725 PAID TO: SECRETARY OF STATES OFFICE	***Code:***	SF	***ServType:***	
		Deposit:			
		Cost:	$50.00	***ServCost:***	
6/18/2024	MOTION AND ORDER TO WITHDRAW DUSTAN J. ABSHIRE AS COUNSEL OF RECORD FOR PLTF, JOHN CLIFFORD J KING; ORDER SIGNED BY JUDGE RONALD C. RICHARD ON 6/20/2024; COPY OF LETTER W/EMAIL FILED HEREIN BY ATTY DUSTAN J. ABSHIRE. CERT OF SERVICE. COVER LETTER FILED. COPY TO ATTY ABSHIRE. COPY TO PLTF.CVR LTR/MOTION/ORDER/COPY2 EXH	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$25.00	***ServCost:***	

6/20/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM, LLC OF $25.00 ADD DEP MOTION& ORDER TO WITHDRAW AS COUNSEL OF RECORD	***Code:***	PD	***ServType:***	
		Deposit:	$25.00		
		Cost:		***ServCost:***	
6/21/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO PLTF, JOHN CLIFFORD J KING @ 123 N LOUISIANA AVE, LAKE CHARLES, LA 70601	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/24/2024	COPY OF PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.**THE ORIGINAL THAT WAS FILED 5/31/2024 ATTACHED TO THIS COPY FOR JUDGE RICHARDS REVIEW** DENIED DUE TO NO 3RD PARTY AFFIANT PROVIDED**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/27/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF HAS FAILED TO PROVIDE A THIRD PARTY AFFIANT. CC TO PLTF.ORDER/CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
7/3/2024	ANSWER FILED HEREIN BY DEFENDANT, HARTFORD FIRE INSURANCE COMPANY, THRU ATTY KAMIE T. DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; CERTIFICATE OF SERVICEANSWER (2 PAGES)	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	
7/3/2024	ADDED DEPOSIT FROM KAMIE DOMINIC OF $25.00 ADD DEP FOR ANSWER	***Code:***	PD	***ServType:***	
		Deposit:	$25.00		
		Cost:		***ServCost:***	
7/3/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $10.00	***Code:***	PD	***ServType:***	
		Deposit:	$10.00		
		Cost:		***ServCost:***	

7/9/2024	SPOKE TO DEFT ATTY KAMIE DOMINIC AND SHE CONFIRMED SHE EMAIL THE ANSWER TO JOHN KING; THEREFORE, IT DID NOT NEED TO BE SERVED	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
7/25/2024	AMENDING & SUPPLEMENTAL MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY DUSTAN J ABSHIRE & SIGNED BY JUDGE RONALD C. RICHARD ON 7/29/2024. CERT OF SERVICE. COVER LETTER FILED. CONF COPY TO ATTY ABSHIRE.CVR LTR/ORDER/COPY**CC MAILED TO PLTF; CC MAILED TO DEFT ATTY**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$15.00	***ServCost:***	
7/25/2024	ADDED DEPOSIT FROM DUSTIN J. ABSHIRE OF $15.00 ADD DEP/ MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD	***Code:***	PD	***ServType:***	
		Deposit:	$15.00		
		Cost:		***ServCost:***	
7/30/2024	FAX FILED -PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
8/2/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON ** UP FOR JUDGE REVIEW**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
8/13/2024	ORDER FOR PAUPER AFFIDAVIT SIGNED BY JUDGE RONALD C. RICHARD ON 8/13/2024 ** FROM THIS DATE PLTF WILL BE ALLOWED TO PROCEED IN PAUPER STATUS** NOTIFIED PLTF	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
10/31/2024	FAX FILED - MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	

10/31/2024	MOTION IN LIMINE TO EXCLUDE HEARSAY WITNESSES AND EVIDENCE (2 PAGES); ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION (2PGS)/ORDER/2CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$24.00	***ServCost:***	
10/31/2024	MOTION TO STRIKE & MOTION FOR SANCTIONS; ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION/ORDER/2CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$22.00	***ServCost:***	
10/31/2024	ANSWER TO AMENDED PETITION FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE T DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059ANSWER/1CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
10/31/2024	NOTICE OF ANSWER TO AMENDED PETITION ISSUED TO (KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601)	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	
10/31/2024	ADDED DEPOSIT FROM RENEE E OR PATRICK S AMOS OF $350.00 ADD DEP FOR AMENDED ANSWER. MOTION IN LIMINE & MOTION TO STRIKE	***Code:***	DD	***ServType:***	
		Deposit:	$350.00		
		Cost:		***ServCost:***	
11/1/2024	FAX FILED - DEFENDANTS OPPOSITION TO PLAINTIFFS MOTION TO CONTINUE & MOTION TO QUASH (3 PAGES); ORDER FAX FILED HEREIN BY DEFTS THRU ATTY KAMIE DOMINIC. CERT OF SERVICE. COVER LETTER.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION IN LIMINE	***Code:***	CIO	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	

11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION TO STRIKE & FOR SANCTIONS	***Code:***	CIO	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	

University Hospital

150 Bergen Street
Newark, New Jersey 07103-2425

Radiology Order Requisition

Patient Information

Pt Name	Account Number	Sex	Birthday
King, John C.J.		**Male**	**4/17/1986**

Patient Demographics

Address	Phone

ABN Associated with this Order

No ABN is associated with this order.

Encounter Information

	Provider	Department	Dept Phone
7/11/2024 2:00 PM	Adonay Castillo, MD	NEU NEUROLOGY UH	973-972-9107

Provider Information

Ordering User
Castillo, Adonay, MD
PCP
Rosenberg, Rachel K, MD

Authorizing Provider
Hillen, Machteld E, MD

MRI BRAIN WITHOUT CONTRAST [143648374]

Status: **Active**

Electronically signed by: **Castillo, Adonay, MD on 07/11/24 1528**
Ordering user: Castillo, Adonay, MD 07/11/24 1528
Authorized by: Hillen, Machteld E, MD
Indications of use: Seizure, [redacted] traumatic (Age 18-40y)

Screening Form

General Information

Patient Name: King, John C.J.
Date of Birth: 4/17/1986
Sex Assigned at Birth: Male

MRN: 014672314
Home Phone: [redacted]
Mobile: [redacted]

Procedure	Ordering Provider	Authorizing Provider	Appointment Information
MRI BRAIN WITHOUT CONTRAST		Hillen, Machteld E, MD . 973-972-[redacted]	

Screening Form Questions

No questions have been answered for this form.

Order Diagnosis

	ICD-10-CM	ICD-9-CM
Seizure - Primary	R56.9	780.39

Order Information

Priority:
ROUTINE

Allergies as of 7/11/2024

Reviewed on 7/11/2024

No Known Allergies

Medical History

Medical History (continued)

Diagnosis	Date	Comment	Source
Herniated lumbar intervertebral disc		L4-L5	
High blood pressure			

Electronically signed by: Castillo, Adonay, MD **Lic # < Not on File >** **NPI: < Not on File >**
Authorized by: Hillen, Machteld E, MD **Lic # 25MA071[redacted]** **NPI: 1255362463**

King, John C.J. (MR # 0146[redacted])

University Hospital

150 Bergen Street
Newark, New Jersey 07103-2425

Procedure Order Request

Patient Information

Pt Name	Sex	Birthday
King, John C.J. (0146[redacted])	**Male**	**4/17/1986**

Patient Demographics

Address	Phone	E-mail Address
[redacted]	[redacted] (Home) *Preferred* [redacted] (Mobile)	johncjking86@gmail.com

ABN Associated with this Order

No ABN is associated with this order.

Encounter Information

	Provider	Department	Dept Phone
7/11/2024 2:00 PM	Adonay Castillo, MD	NEU NEUROLOGY UH	973-972-9107

Provider Information

Ordering User	Authorizing Provider
Castillo, Adonay, MD	Hillen, Machteld E, MD

PCP
Rosenberg, Rachel K, MD

[redacted]

Electronically signed by: **Castillo, Adonay, MD on 07/11/24 1528** Status: **Active**
Ordering user: Castillo, Adonay, MD 07/11/24 1528 Authorized by: Hillen, Machteld E, MD
Order comments: Sleep Deprivation, he was instructed to wake up at 3am and stay awake

Order Diagnosis

	ICD-10-CM	ICD-9-CM
Seizure - Primary	R56.9	780.39

Order Information

Priority:
ROUTINE

Electronically signed by: Castillo, Adonay, MD **Lic # < Not on File >** **NPI: < Not on File >**
Authorized by: Hillen, Machteld E, MD **Lic # 25MA0710[redacted]** **NPI: 125536[redacted]**

FW: Emailing: 23-2124 King vs Amos - Cost Bill

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: Jinnifer Marcantel <jleblanc@schrumpf-law.com>

Cc: True King <truekingfile@gmail.com>

Date: Wed, 28 May 2025 14:02:32 -0500

Attachments:
23-2124 King vs Amos - Cost Bill.pdf

-----Original Message-----
From: Monica Abshire <mabshire@lccitycourt.org>
Sent: Wednesday, May 28, 2025 10:54 AM
To: oschrumpf@schrumpf-law.com; Jinnifer LeBlanc <jleblanc@schrumpf-law.com>
Cc: Rebecca Liles <rebeccaliles@lccitycourt.org>
Subject: Emailing: 23-2124 King vs Amos - Cost Bill

Good Morning Mr. Schrumpf -

Please see attached the Cost bill for Costs owing by Mr. King.
Any questions please do not hesitate to call me.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs Amos - Cost Bill

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

May 28, 2025

TO: Oliver "Jackson" Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Email: oschrumpf@schrumpf-law.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5,397.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)

Please remit payment for the amount listed above.

If you have any questions about the named suit above, please call the Accounting Section of Lake Charles City Court at (337) 491-8701, or Civil office at (337)491-1564.

Monica Abshire
Clerk of Court
mabshire@lccitycourt.org

Bond Department
One Hartford Plaza T-14
Hartford, CT 06155

May 11, 2023

VIA EMAIL ONLY

John C. King
123 N. Louisiana Ave.
Lake Charles, LA 70601

Re:		
	Surety:	Hartford Fire Insurance Company ("**Hartford**")
	Principal:	Renee E. Amos
	Obligee:	Louisiana Secretary of State
	Claim No.:	564 S 66413
	Bond No:	43 BSB IB3612 ("**Notary Bond**" or "**Bond**")
	Claimant:	John C. King

Dear Mr. King:

Hartford hereby acknowledges receipt of your e-mailed correspondence of May 8, 2023, in which the following documents in support of your claim against the above-referenced Bond were attached:

(1) Executed Affidavit of Claim dated May 4, 2023,
(2) Calcasieu Parish Sheriff's Office ('**CPSO**') Case Report Summary for Case No. 2021-00123665, reported on October 9, 2021,
(3) Correspondence from the CPSO dated August 4, 2022,
(4) CPSO's Offense Report Receipt for Report No. 21-123665 and received by the Calcasieu Parish February 2, 2022,
(5) CPSO's Supplement Narrative for Case No. 21-123665, not dated,
(6) CPSO's Offense Report Receipt for Case No. 2021-00123665 detailing the list of evidentiary items attached and stamped 'Received' on November 8, 2021,
(7) CPSO's 4-page Case Report for Case No. 2021-00123665, reported by John King on October 9, 2021,
(8) Weld Visual Inspection reports naming John King as the FTC Inspector dated September 7, 2021,
(9) Southwest Louisiana Credit Union Member Authorization forms,
(10) Capital One financial statements for John King's account during the month of September 2021,
(11) Vehicle Title Information for the 2011 Chevy Traverse, VIN 1GNKRJED5BJ220559,
(12) CPSO's Supplement Report for Case No. 2021-00123665, not dated,
(13) CPSO's Case Report Summary for Case No. 2021-00147277, reported December 9, 2021; and,
(14) Order in the matter of John Clifford Joseph King, Sr. VS No.2021-002773, Div. A Charmaine Colston filed August 13, 2021.

As you may be aware, the above-referenced Notary Bond is a statutory Bond. As such, coverage and the procedure for making a claim under the Bond are governed by Title 35, of the Louisiana Revised Statutes. Title 35 § 200 (A) states as follows:

> No action for damages against any notary public duly commissioned in any parish in this state. . . answerable for the damage occasioned by such notary public in the exercise of the functions of a notary public, whether based upon tort, or breach of contract, or otherwise, arising out of an engagement to

> provide notarial services shall be brought unless filed in a court of competent jurisdiction and proper venue within one year from the date of the alleged act, omission, or neglect, or within one year from the date that the alleged act, omission, or neglect is discovered or should have been discovered. . .

Based on the statutory language, action for damages against a notary public must be brought within one year from the date of the alleged act, omission, or neglect, or within one year from the date that the alleged act, omission, or neglect is discovered. The alleged act was reported to have occurred in or around September 2021 and the accompanying police report indicates that you were of the alleged act in or around October 2021.

Based on the above analysis, Hartford hereby respectfully denies John C. King 's claim, as being untimely. If there are additional facts, documentation, information or legal analysis that may alter the conclusions set forth herein, please forward such information to my attention for reconsideration.

Hartford reserves the right to supplement, modify and amend the defenses set forth in this letter based on further factual development or legal analysis. Please note that this letter is not, and shall not be, construed as an admission of liability under the Bond or any applicable law. All rights and defenses, which are or may become available to Hartford or Renee E. Amos, are and shall remain fully and strictly reserved whether mentioned in subsequent communications or not. Subject to this continuing reservation, please direct all future correspondence on this matter to my attention. Please include the Claim Number on all communications.

Sincerely,
Hartford Fire Insurance Company

Celeste Hibler

Celeste Hibler
Bond Claim Department
Phone: (847) 285-9034
Email: Celeste.Hibler@thehartford.com

CH

cc: New Orleans Regional Office, via facsimile
Louisiana Agencies LLC, via facsimile
Renee E. Amos; via mail



Proof I was at work on Sept 7, 2021
Clifford J King

6. KING'S WORK DOCUMENTS

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

☑ STRUCTURAL STEEL ☐ PIPE ☐ CURTAIN WALL ☐ PRECAST

☐ LIGHT GAUGE STEEL ☐ MISC. STEEL

CLIENT: JP Morgan Chase DATE: 09/07/2021

PROJECT: JP Morgan Chase - 270 Park Ave P3 Core and Shell FTC NO.: JPMC118P3

PROJECT LOCATION: 270 Park Avenue, New York, NY 10017 PAGE NO.: 1 OF 3

SHOP LOCATION: 1640 New Market Ave, S. Plainfield, NJ 07080 INSPECTOR: John King

WELDING CONTRACTOR: Banker Steel Company TIME IN: 12:00 pm TIME OUT: 8:30 pm

DESCRIPTION OF INSPECTION:
Monitoring the in process welding and fabrication of: 4082C004, 4082C005

LOCATION OF INSPECTION:
Banker Steel, South Plainfield, NJ Shop 7

REFERENCE DRAWINGS BY / DRAWINGS NO. / DATE / REVISION DATE:
TR.TJ/4082C004/11.16.2020/03.11.2021/R1 NT.MM/4082C005/11.11.2020/03.11.2021/R1

MATERIAL TYPE: A572-Gr 50 CVNA

WELD CHECKLIST	INSPECTION RESULTS	
	Accepted	Rejected
Joint Type: ☐ Fillet ☑ Groove ☐ _____	√	
Welding Process: SAW, FCAW	√	
Electrode: E70T-1C(Lincoln XP70), E71T-1C(HDC, UC71), F7A2-EM12K(L61)	√	
Size of Weld: Various	√	
Final Visual Inspection	*	

Welder 1: B. Thomas Cert. No.: 41054 Expiration: *

Welder 2: C. Dimaggio Cert. No.: 4690 Expiration: *

REMARKS:
Welder #3 C. Candelario 4715*

* See Banker Steel management for WQR expiration dates.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-84
(Rev 01/05/17)

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

4082C004 - bp2684, bp2649 - Welder #2, Welder #3 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

4082C005 - bp2684, bp2649 - Welder #1 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	3 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

NON CONFORMANCES: N/A

Inspections Witnessed: N/A

Final Inspection: N/A

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:** 12:00 pm	**TIME OUT:** 8:30 pm

3091C006 - BP31, BP2372, BP32 - Welder #1, Welder #2 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/18)

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	4 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:** 12:00 pm	**TIME OUT:** 8:30 pm

NON CONFORMANCES: 1A271G04 piping porosity the entire length of weld.

Inspections Witnessed: N/A

Final Inspection: 1A271G04 failed.

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

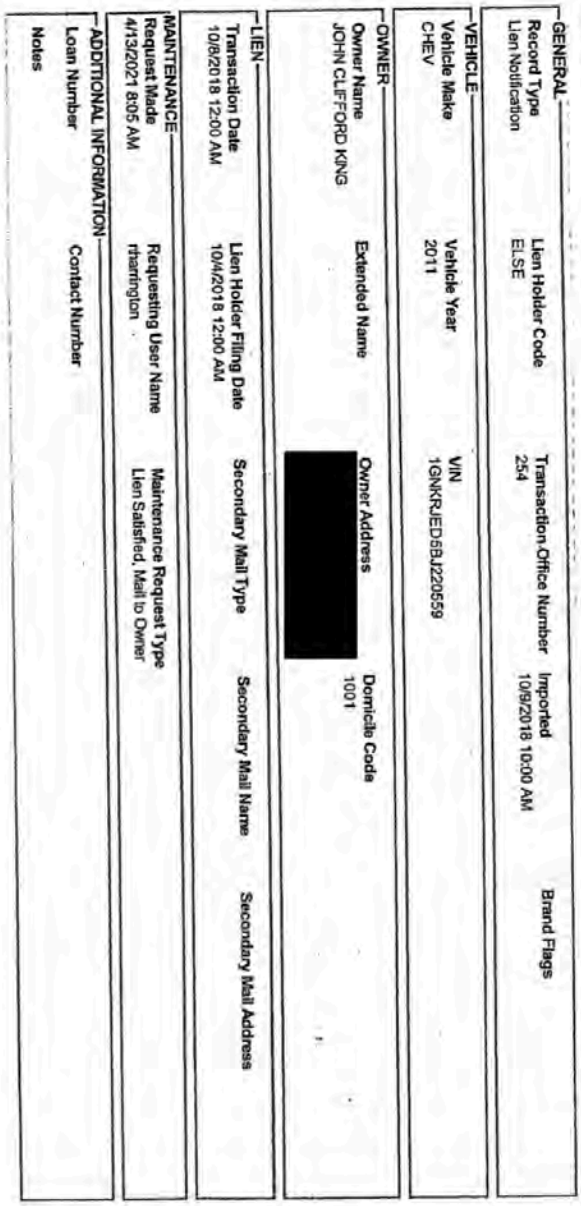
John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/16)

5. Southwest Louisiana Credit Union Documents



Details

GENERAL

Record Type	Lien Holder Code	Transaction Office Number	Imported	Brand Flags
Lien Notification	ELSE	254	10/9/2018 10:00 AM	

VEHICLE

Vehicle Make	Vehicle Year	VIN
CHEV	2011	1GNKRJED5BJ220559

OWNER

Owner Name	Extended Name	Owner Address	Domicile Code
JOHN CLEFFORD KING		[redacted]	1001

LIEN

Transaction Date	Lien Holder Filing Date	Secondary Mail Type	Secondary Mail Name	Secondary Mail Address
10/8/2018 12:00 AM	10/4/2018 12:00 AM			

MAINTENANCE

Request Made	Requesting User Name	Maintenance Request Type
4/13/2021 8:05 AM	rharrington	Lien Satisfied, Mail to Owner

ADDITIONAL INFORMATION

Loan Number	Contact Number

Notes

Credit union she impersonated my spouse was never married

Southwest
LOUISIANA CREDIT UNION

MEMBER TO MEMBER AUTHORIZATION FORM

Print to CDP Manage and Save as an Account Change Card

Member Name: CHARMAINE COLSTON

Member Number: 1000059007

Allow access to transfer to the following:

Member Name	Member Number	Relationship
JOHN KING	1000058944	HUSBAND

I, CHARMAINE COLSTON do hereby authorize Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I understand that any changes must be made by me in person at the Credit Union. I am aware that I'm allowed to make transfers only to other members share accounts and I'm not authorized to make inquiries on these accounts.

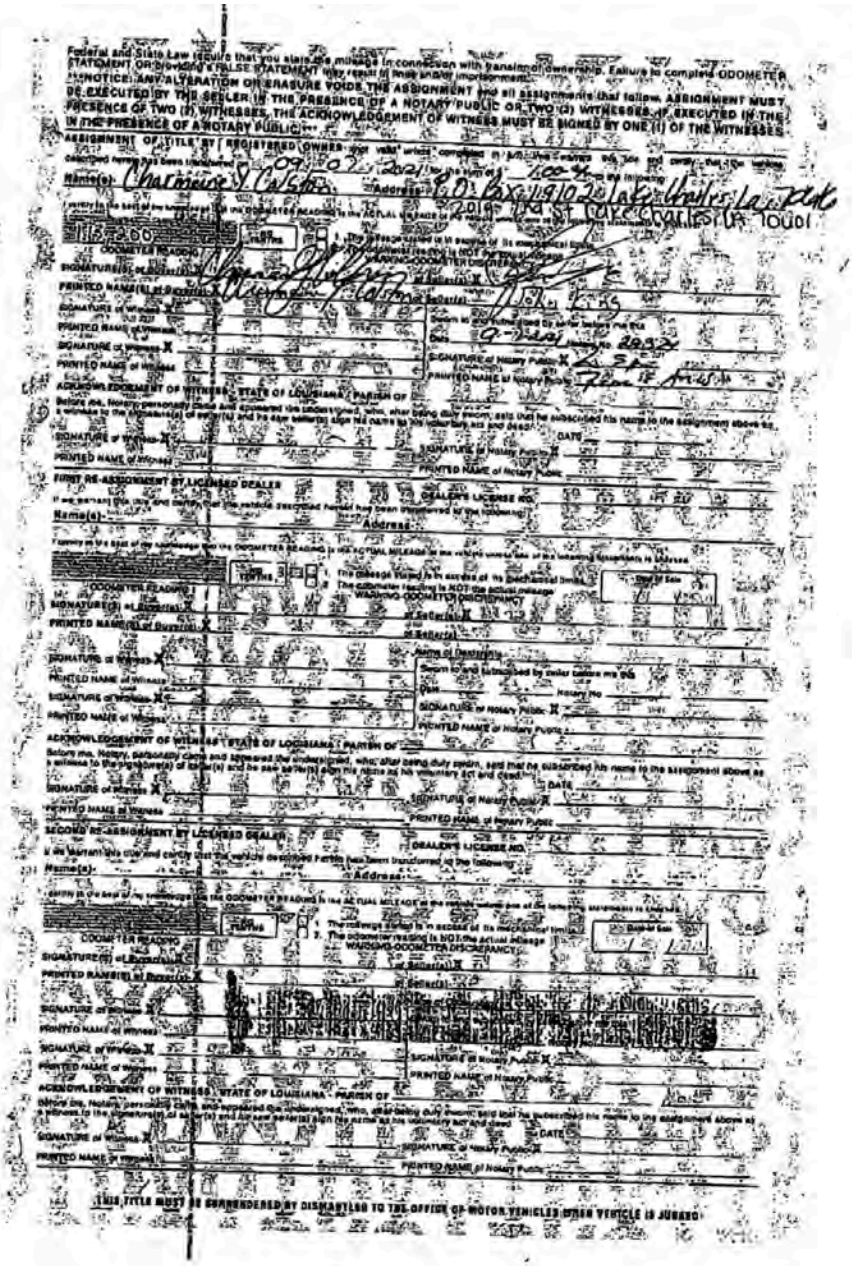
Member Signature [signature] Date: 3/14/17

I, _____ do hereby revoke Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I am aware that by revoking such authorization, I am no longer allowed to make transfers to these members share accounts

Member Signature _____ Date: _____

MSR: AW MSR #: 012

FORGED TITLE IS NOT MY SIGNATURE



Federal and State Law requires that you state the mileage in connection with transfer of ownership. Failure to complete ODOMETER STATEMENT OR providing a FALSE STATEMENT may result in fines and/or imprisonment.

NOTICE: ANY ALTERATION OR ERASURE VOIDS THE ASSIGNMENT

ASSIGNMENT OF TITLE BY [REGISTERED OWNER

Name(s): Charmaine J. Calder

Address: P.O. Box 11902 Lake Charles, La. 70601

2018 Ford F-150 Crew Cab

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

FIRST RE-ASSIGNMENT BY LICENSED DEALER

DEALER'S LICENSE NO.

Name(s):

Address:

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

SECOND RE-ASSIGNMENT BY LICENSED DEALER

DEALER'S LICENSE NO.

Name(s):

Address:

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

THIS TITLE MUST BE SURRENDERED BY DISMANTLER TO THE OFFICE OF MOTOR VEHICLES WHEN VEHICLE IS JUNKED



2019 2nd St
LC 70601

Louisiana Department of Public Safety and Corrections
Office of Motor Vehicles
PO Box 64886
Baton Rouge, LA 70896

APPLICANT'S SIGNATURE (IF REQUIRED)

VALIDATED BY

25U TY/CODE	34EEYM LICENSE PLATE	05/2023 EXPIRATION	1GNKRLED5BJ220569 VIN		10/06/2021 DATE	1001 DOMICILE	
CHEV MAKE	TRV MODEL/WEIGHT	40 BODY	RED/ COLOR	2011 YEAR	113200 ODOMETER	0941 MOS ST/RTE	ICL CITY LIMITS
4 SCD	NOREQ DEALER CODE	0101 CL CLASS	SPEC CODES	PRIV AUTO USE		02/2023 OLD EXP	CITATION DATE
	FLAGS			F1999405 PREVIOUS TITLE	LA STATE	OLD LIC NO	EXP
LI NAU	05/07/2021 DATE ACQUIRED	LPF EPT	CURRENT LA TITLE	TAXABLE VAL MANUF		05/07/2021 TAX DATE	10/06/2021 EFFECTIVE DATE
100.00 SPOV OR VALUE		TRADE VALUE	REBATE	700.00 TAXABLE VALUE			
254 OFFICE NUMBER		REPRINT		HIST			
1750 825 OPERSPID	52 SEQ #	11111111 MICROFILM #		BATCHUSER #			

Use Date

OWNER'S NAME
CHARMAINE Y COLSTON
2019 2ND STREET
LAKE CHARLES LA 70601
NT: 1

TAX & FEE INFORMATION

ST SALES TAX	6.42	LIC FEE	20.00
ST TAX PNLT		TOW FEE	
ST INTEREST		LIC CRDT	
ST TAX CRDT		LIC PNLT	
ST PNLT CRDT		LIC TRANSFER	
ST VNDRS COMP		LIC PNLT CRDT	
NET ST TAX	6.42	NET LIC FEE	20.00
TOURISM	.03	PARISH FEE	
PYM SALES TAX	5.75	MTC FEE	
PYM TAX PNLT		MISC FEE	
PYM INTEREST		SERVICE MNDL	
PYM CRDS TX CRDT		TITLE FEE	68.50
PYM PNLT CRDT		TITLE HOOL	8.00
PYM VNDRS COMP		EXP TITLE FEE	
WHCLCHAIR LIFT		ADMIN FEE	
NET PYM TAX	5.75	S.P. FEE	
TOTAL TAX	10.20	TRUCK ADVISORY	
		TOTAL FEES	96.50
TOTAL: 106.70		REMITTANCE:	

NT: 1

STATUS: MAIL-TO

CHARMAINE Y COLSTON
PO BOX 19102
LAKE CHARLES LA 70616

LOUISIANA OFFICE OF MOTOR VEHICLES
MICROFILMIMAGE COPY

[redacted]

0.00%	$0.00	30
ANNUAL PERCENTAGE YIELD (APY) EARNED	YTD INTEREST AND BONUSES	DAYS IN STATEMENT CYCLE

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 1	Opening Balance			$1.48
Sep 30	Closing Balance			$1.48

Fees Summary

	TOTAL FOR THIS PERIOD	TOTAL YEAR-TO-DATE
Total Fees	$0.00	$0.00

capitalone.com 1-888-464-0727 P.O. Box 60, St. Cloud, MN 56302 MEMBER FDIC

Proof I was at work on Sept 7, 2021
Clifford J King

6. KING'S WORK DOCUMENTS

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

☑ STRUCTURAL STEEL ☐ PIPE ☐ CURTAIN WALL ☐ PRECAST

☐ LIGHT GAUGE STEEL ☐ MISC. STEEL

CLIENT: JP Morgan Chase DATE: 09/07/2021

PROJECT: JP Morgan Chase - 270 Park Ave P3 Core and Shell FTC NO.: JPMC118P3

PROJECT LOCATION: 270 Park Avenue, New York, NY 10017 PAGE NO.: 1 OF 3

SHOP LOCATION: 1640 New Market Ave, S. Plainfield, NJ 07080 INSPECTOR: John King

WELDING CONTRACTOR: Banker Steel Company TIME IN: 12:00 pm TIME OUT: 8:30 pm

DESCRIPTION OF INSPECTION:
Monitoring the in process welding and fabrication of: 4082C004, 4082C005

LOCATION OF INSPECTION:
Banker Steel, South Plainfield, NJ Shop 7

REFERENCE DRAWINGS BY / DRAWINGS NO. / DATE / REVISION DATE:
TR.TJ/4082C004/11.16.2020/03.11.2021/R1 NT.MM/4082C005/11.11.2020/03.11.2021/R1

MATERIAL TYPE: A572-Gr 50 CVNA

WELD CHECKLIST	INSPECTION RESULTS	
	Accepted	Rejected
Joint Type: ☐ Fillet ☑ Groove ☐ _____	√	
Welding Process: SAW, FCAW	√	
Electrode: E70T-1C(Lincoln XP70), E71T-1C(HDC, UC71), F7A2-EM12K(L61)	√	
Size of Weld: Various	√	
Final Visual Inspection	*	

Welder 1: B. Thomas Cert. No.: 41054 Expiration: *

Welder 2: C. Dimaggio Cert. No.: 4690 Expiration: *

REMARKS:
Welder #3 C. Candelario 4715*

* See Banker Steel management for WQR expiration dates.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-84
(Rev 01/05/17)

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

4082C004 - bp2684, bp2649 - Welder #2, Welder #3 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

4082C005 - bp2684, bp2649 - Welder #1 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	3 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

NON CONFORMANCES: N/A

Inspections Witnessed: N/A

Final Inspection: N/A

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:** 12:00 pm	**TIME OUT:** 8:30 pm

3091C006 - BP31, BP2372, BP32 - Welder #1, Welder #2 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/18)

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	4 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:** 12:00 pm	**TIME OUT:** 8:30 pm

NON CONFORMANCES: 1A271G04 piping porosity the entire length of weld.

Inspections Witnessed: N/A

Final Inspection: 1A271G04 failed.

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

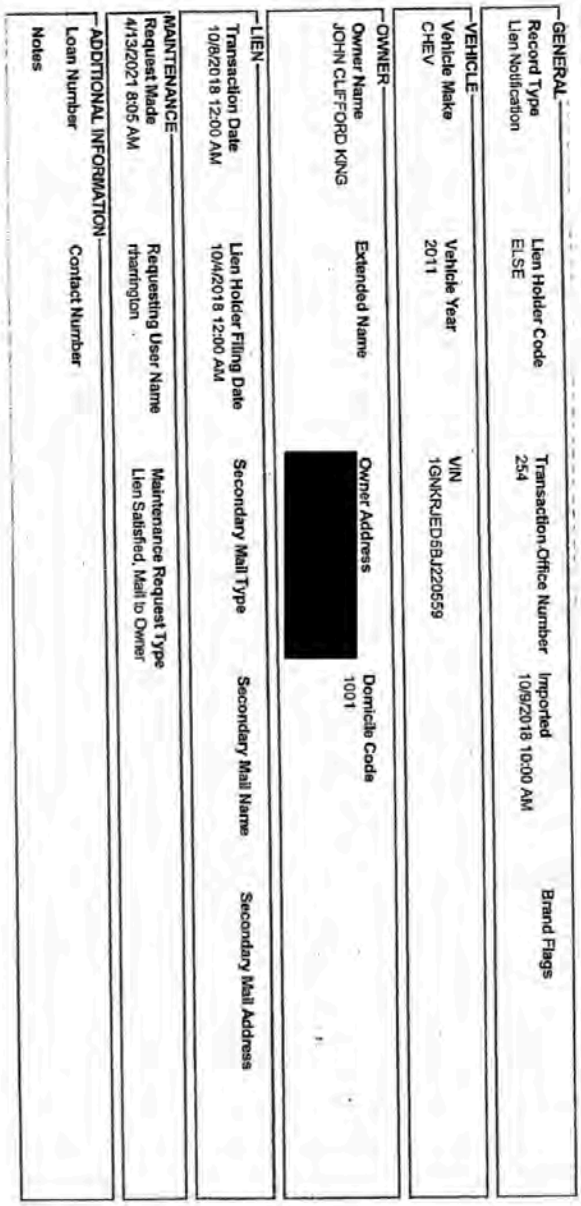
John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/16)

5. Southwest Louisiana Credit Union Documents



Details

GENERAL

Record Type	Lien Holder Code	Transaction Office Number	Imported	Brand Flags
Lien Notification	ELSE	254	10/9/2018 10:00 AM	

VEHICLE

Vehicle Make	Vehicle Year	VIN
CHEV	2011	1GNKRJED5BJ220559

OWNER

Owner Name	Extended Name	Owner Address	Domicile Code
JOHN CLEFFORD KING		[redacted]	1001

LIEN

Transaction Date	Lien Holder Filing Date	Secondary Mail Type	Secondary Mail Name	Secondary Mail Address
10/8/2018 12:00 AM	10/4/2018 12:00 AM			

MAINTENANCE

Request Made	Requesting User Name	Maintenance Request Type
4/13/2021 8:05 AM	rharrington	Lien Satisfied, Mail to Owner

ADDITIONAL INFORMATION

Loan Number	Contact Number

Notes

Credit union she impersonated my spouse was never married

Southwest
LOUISIANA CREDIT UNION

MEMBER TO MEMBER AUTHORIZATION FORM

Print to CDP Manage and Save as an Account Change Card

Member Name: CHARMAINE COLSTON

Member Number: 1000059007

Allow access to transfer to the following:

Member Name	Member Number	Relationship
JOHN KING	1000058944	HUSBAND

I, CHARMAINE COLSTON do hereby authorize Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I understand that any changes must be made by me in person at the Credit Union. I am aware that I'm allowed to make transfers only to other members share accounts and I'm not authorized to make inquiries on these accounts.

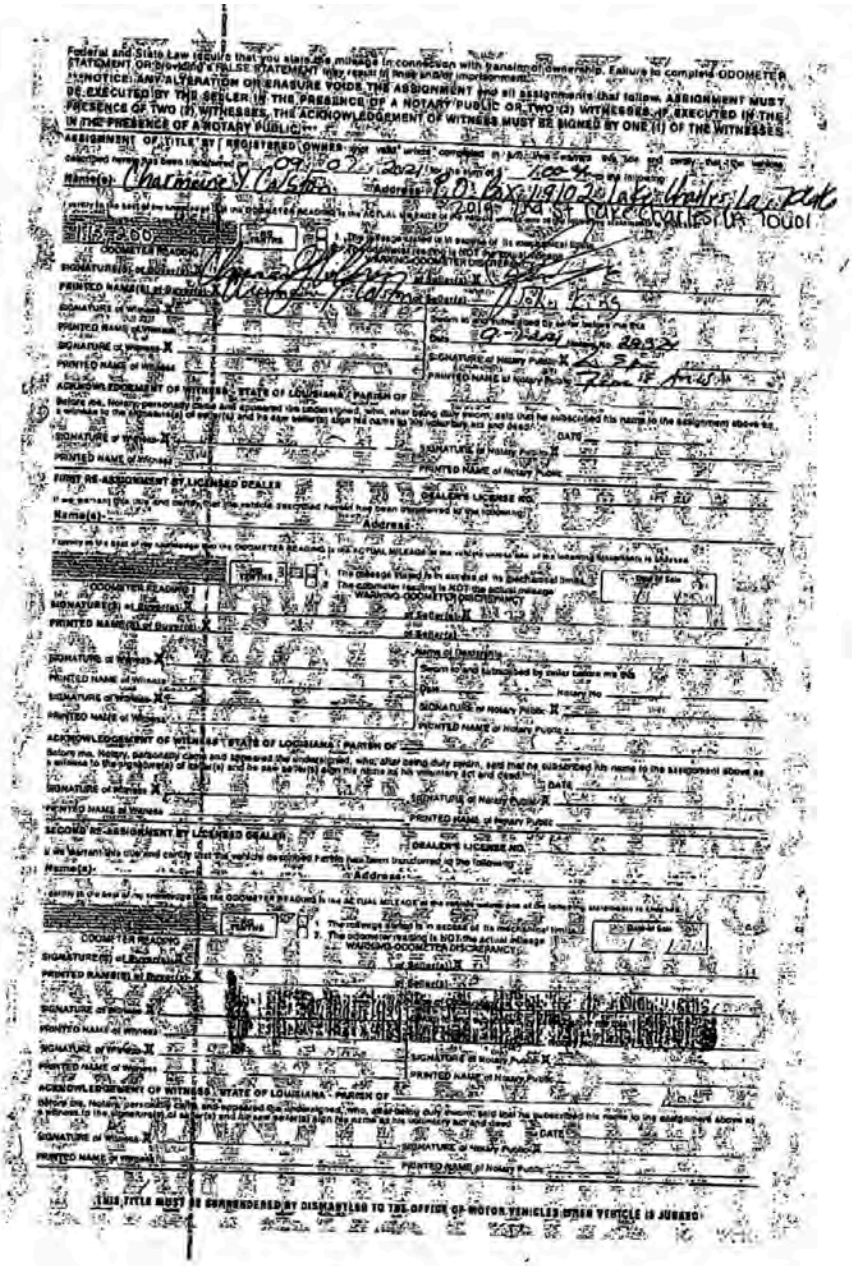
Member Signature [signature] Date: 3/14/17

I, _____ do hereby revoke Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I am aware that by revoking such authorization, I am no longer allowed to make transfers to these members share accounts

Member Signature _____ Date: _____

MSR: AW MSR #: 012

FORGED TITLE IS NOT MY SIGNATURE



Federal and State Law requires that you state the mileage in connection with transfer of ownership. Failure to complete ODOMETER STATEMENT OR providing a FALSE STATEMENT may result in fines and/or imprisonment.

NOTICE: ANY ALTERATION OR ERASURE VOIDS THE ASSIGNMENT

ASSIGNMENT OF TITLE BY [REGISTERED OWNER

Name(s): Charmaine J. Calder

Address: P.O. Box 11902 Lake Charles, La. 70601

2018 Ford F-150 Crew Cab

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

FIRST RE-ASSIGNMENT BY LICENSED DEALER

DEALER'S LICENSE NO.

Name(s):

Address:

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

SECOND RE-ASSIGNMENT BY LICENSED DEALER

DEALER'S LICENSE NO.

Name(s):

Address:

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

THIS TITLE MUST BE SURRENDERED BY DISMANTLER TO THE OFFICE OF MOTOR VEHICLES WHEN VEHICLE IS JUNKED



2019 2nd St
LC 70601

Louisiana Department of Public Safety and Corrections
Office of Motor Vehicles
PO Box 64886
Baton Rouge, LA 70896

APPLICANT'S SIGNATURE (IF REQUIRED)

VALIDATED BY

25U TY/CODE	34EEYM LICENSE PLATE	05/2023 EXPIRATION	1GNKRLED5BJ220569 VIN		10/06/2021 DATE	1001 DOMICILE	
CHEV MAKE	TRV MODEL/WEIGHT	40 BODY	RED/ COLOR	2011 YEAR	113200 ODOMETER	0941 MOS ST/RTE	ICL CITY LIMITS
4 SCD	NOREQ DEALER CODE	0101 CL CLASS	SPEC CODES	PRIV AUTO USE		02/2023 OLD EXP	CITATION DATE
	FLAGS			F1999405 PREVIOUS TITLE	LA STATE	OLD LIC NO	EXP
LI NAU	05/07/2021 DATE ACQUIRED	LPF EPT	CURRENT LA TITLE	TAXABLE VAL MANUF		05/07/2021 TAX DATE	10/06/2021 EFFECTIVE DATE
100.00 SPOV OR VALUE		TRADE VALUE	REBATE	700.00 TAXABLE VALUE			
254 OFFICE NUMBER		REPRINT		HIST			
1750 825 OPERSPID	52 SEQ #	11111111 MICROFILM #		BATCHUSER #			

Use Date

OWNER'S NAME
CHARMAINE Y COLSTON
2019 2ND STREET
LAKE CHARLES LA 70601
NT: 1

TAX & FEE INFORMATION

ST SALES TAX	6.42	LIC FEE	20.00
ST TAX PNLT		TOW FEE	
ST INTEREST		LIC CRDT	
ST TAX CRDT		LIC PNLT	
ST PNLT CRDT		LIC TRANSFER	
ST VNDRS COMP		LIC PNLT CRDT	
NET ST TAX	6.42	NET LIC FEE	20.00
TOURISM	.03	PARISH FEE	
PYM SALES TAX	5.75	MTC FEE	
PYM TAX PNLT		MISC FEE	
PYM INTEREST		SERVICE MNDL	
PYM CRDS TX CRDT		TITLE FEE	68.50
PYM PNLT CRDT		TITLE HOOL	8.00
PYM VNDRS COMP		EXP TITLE FEE	
WHCLCHAIR LIFT		ADMIN FEE	
NET PYM TAX	5.75	S.P. FEE	
TOTAL TAX	10.20	TRUCK ADVISORY	
		TOTAL FEES	96.50
TOTAL: 106.70		REMITTANCE:	

NT: 1

STATUS: MAIL-TO

CHARMAINE Y COLSTON
PO BOX 19102
LAKE CHARLES LA 70616

LOUISIANA OFFICE OF MOTOR VEHICLES
MICROFILMIMAGE COPY

[redacted]

0.00%	$0.00	30
ANNUAL PERCENTAGE YIELD (APY) EARNED	YTD INTEREST AND BONUSES	DAYS IN STATEMENT CYCLE

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 1	Opening Balance			$1.48
Sep 30	Closing Balance			$1.48

Fees Summary

	TOTAL FOR THIS PERIOD	TOTAL YEAR-TO-DATE
Total Fees	$0.00	$0.00

capitalone.com 1-888-464-0727 P.O. Box 60, St. Cloud, MN 56302 MEMBER FDIC

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

May 28, 2025

TO: Oliver "Jackson" Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Email: oschrumpf@schrumpf-law.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5,397.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)

Please remit payment for the amount listed above.

If you have any questions about the named suit above, please call the Accounting Section of Lake Charles City Court at (337) 491-8701, or Civil office at (337)491-1564.

Monica Abshire
Clerk of Court
mabshire@lccitycourt.org

John C. King vs Rene Amos

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: True King <truekingfile@gmail.com>

Cc: Dawn Brown <dbrown@schrumpf-law.com>, Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

Date: Fri, 08 Nov 2024 09:36:03 -0600

Mr. John C. King:

`This will confirm that we had a lengthy telephone conversation this morning. This will confirm that I advised you that the judge denied the motion for continuance but he said IF you supply a letter from a doctor explaining the reasons you cannot travel to court in Louisiana, he will allow you to testify via ZOOM.

1. Please attempt to get the treating physician to execute a letter SIGNED BY A PHYSICIAN BY MONDAY NOVEMBER 11 (A court holiday - so we should try to get it today (Friday Nov. 8, 2024, if possible) THE LETTER FROM THE PHYSICIAN NEEDS TO SAY THAT HE or SHE IS TREATING MR. JOHN C. KING, WHAT MR.KING'S CONDITION IS, AND THAT MR. KING IS medically PROHIBITED FROM TRAVELLING from New Jersey to Louisiana until (Date) BECAUSE OF SEVERE RISK OF PERMANENT INJURY (OR WHATEVER OTHER REASON THE DOCTOR HAS FOR PROHIBITING TRAVEL FROM NEW JERSEY TO LOUISIANA). IT MUST BE SIGNED BY THE DOCTOR AND DATED. IT MUST BE RECEIVED BY ME SO I CAN GET IT TO THE JUDGE FIRST THING TUESDAY MORNING or sooner.

2. Please advise if Shunte King will plan to be here Thursday November 14 for trial. I advised that Judge Richard may want to hold a contempt hearing based upon claims she made in various filings with the court claiming misconduct on the part of the judge and his staff) and Judge Richard said he may charge Shunte King with Practicing law without a license based upon filings she made in this case on your behalf. I advised her she should contact the Johnson Law firm 1419 Ryan St, Lake Charles, LA 70601; *Phone: *(337) 282-8556 <https://www.google.com/search?q=Johnson+law+firm%2C+Lake+Charles&rlz=1C1CHBF_enUS897US898&oq=Johnson+law+firm%2C+Lake+Charles&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTINCAEQLhivARjHARiABDIKCAIQABiABBiiBDIKCAMQABiiBBiJBTIKCAQQABiABBiiBDIKCAUQABiiBBiJBdIBCTc5MzZqMGoxNagCCLACAQ&sourceid=chrome&ie=UTF-8>; or Todd Clemons 1740 Ryan St, Lake Charles, LA 70601

*Phone: *(337) 477-0000 <https://www.google.com/search?q=todd+clemons+attorney+lake+charles&sca_esv=fc2e42ae252a1d83&rlz=1C1CHBF_enUS897US898&ei=PywuZ5bROo20ptQPsJibiQI&oq=Todd+Clemons%2C+Lake+Charles&gs_lp=Egxnd3Mtd2l6LXNlcnAiGlRvZGQgQ2xlbW9ucywgTGFrZSBDaGFybGVzKgIIATILEC4YgAQYxwEYrwEyBhAAGAgYHjICECYyCBAAGIAEGKIEMggQABiABBiiBDIIEAAYgAQYogRI0URQhwZY1i9wAXgBkAEAmAGSAaAB2QyqAQQ0LjExuAEByAEA-AEBmAINoAKUCsICChAAGLADGNYEGEfCAgYQABgHGB7CAggQABgHGAgYHsICDRAuGIAEGMcBGA0YrwHCAggQABgIGA0YHp

gDAIgGAZAGCJIHAzQuOaAHw1A&sclient=gws-wiz-serp>
if she wants to obtain representation at this hearing.

3. Please advise what accommodations you have to testify via ZOOM if we can get the doctor's letter in time.

4. Please make certain I have all of the following evidence :

a. A legible copy of the vehicle transfer (showing the date the document was notarized)

b. All available proof to show that John C. King was in New Jersey on the date the transfer was notarized

(Please share this with me via e-mail as soon as possible)

I believe this evidence would be sufficient
to prove that John King did not appear to perform the transfer of title.

Oliver "Jackson" Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

JAMIE B. BICE, JUDGE
RONALD C. RICHARD, JUDGE

OFFICE: 337-491-1305
FAX: 337-491-8676

CIVIL SECTION: 337-491-1564
CIVIL FAX: 337-491-1303

VIOLATION BUREAU: 337-491-1565
VIOLATION FAX: 337-491-8745

LAKE CHARLES CITY COURT
WARD 3 CALCASIEU PARISH

P.O. Box 1664/118 West Mill Street
Lake Charles, LA 70602-1664/70601-4217
www.lccitycourt.org

November 14, 2025

Mr. John Clifford King, Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601
Via CMRRR and email truekingfile@gmail.com

Re: Civil Action No. 23-2124; John Clifford King v Renee Amos

Dear Mr. King:

Our Clerk of Court has notified me of two fax filings you recently submitted in the above-referenced matter. Please be advised that those filings have been time-stamped but not filed into the record because once an appellate decision becomes final under La. C.C.P. art. 2166 and 2167 (as is the case in the above-referenced matter), the judgment acquires *res judicata* effect which bars further litigation of issues that have already been adjudicated. Simply stated, *res judicata* means that an issue that has been definitively settled by judicial decision. The essential elements of *res judicata* are (1) an earlier decision on the issue, (2) a final judgment on the merits, and (3) the involvement of the same parties, or parties in privity with the original parties. *Black's Law Dictionary,* 12th edition.

La. C.C.P. art. 2166 provides that "the judgment of a court of appeal becomes final and definitive if neither an application to the court of appeal for rehearing nor an application to the supreme court for a writ of certiorari is timely filed." La. C.C.P. art. 2166. Our records do not reflect that you filed an application for rehearing with the Third Circuit Court of Appeal following its judgment entered on May 21, 2025. Likewise, La. C.C.P. art. 2167 states that "a judgment of the supreme court becomes final and definitive when the delay for application for rehearing has expired and no timely application therefor has been made."

Additionally, La. R.S. Section 13:4231 codifies the *res judicata* doctrine, providing that "a valid and final judgment is conclusive between the same parties, except on appeal or other direct review." This means that once an appellate judgment becomes final and definitive, any subsequent proceedings in the trial court must be authorized by the remand instructions or must fall outside the scope of the issues already decided. As no such authorization exists here, and this matter has been closed at Lake Charles City Court, the two faxed documents you submitted are being **returned** to you. Finally, any future filings in a matter that has been fully adjudicated and after

all appeals have been exhausted may subject the filer to sanctions, including contempt of court. La. C.C.P. art. 224.

With regard to the cost bill sent to you on May 28, 2025 and again on July 10, 2025, please be aware that La. C.C.P. art. 5186 and 5188 establish that indigent parties (pauper status) who do not prevail on the merits of a case are still responsible to pay costs as cast. More specifically, La. C.C.P. art. 5186(c) states that when an indigent party loses, costs become due. Enclosed is an updated Cost Bill for your review. This updated Cost Bill reflects the Third Circuit ruling of May 21, 2025 and has been adjusted as a result. If you have any questions about the cost bill, please call Monica Abshire at 337-491-1564.

Sincerely,

Jamie B. Bice
Chief Judge, Lake Charles City Court

JBB/kb

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

November 17, 2025
UPDATED

TO: John Clifford J. King
123 N. Louisiana Ave
Lake Charles, LA 70601
Email: truekingfile@gmail.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5397.36 minus Credit $105.00 = New Balance of $5292.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)
Subject to Credit:	$105.00

Please remit payment to Lake Charles City Court for the amount listed above.
Credit cards are assessed an online transaction fee

If you have any questions about the named suit above, please call the Civil office at (337)491-1564.

Monica Abshire
Clerk of Court

FAX COVER SHEET

TO	Lake Charles City Fax
COMPANY	lake charles city court
FAX NUMBER	13374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 18:52:44
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is SUPPLEMENTAL FAX attached to earlier fax dated for today 11/13/2025

Notice of Lack of Jurisdiction and Divestiture Confirmation

Plaintiff submits this Notice to confirm that the Court was divested of jurisdiction on December 3 2024 upon the granting of a devolutive appeal pursuant to Louisiana Code of Civil Procedure article 2088. From that date forward the Court lacked authority to issue orders conduct hearings impose costs generate service attempts rescind pauper status or issue contempt citations. All actions taken after divestiture are void ab initio.

The Court nevertheless conducted hearings on December 18 and December 30 2024 generating additional costs service returns and contempt related entries. These actions were taken without authority and are null. Plaintiff submits this Notice to ensure that no post divestiture fees orders or actions are enforced now or in the future.

ELECTRONIC

FILE DATE: 11-13-2025

Emergency Notice of Prohibited Fee Enforcement

Plaintiff submits this Emergency Notice to preserve all rights before expiration of the statutory period and to document ongoing prohibited enforcement attempts. Plaintiff contacted the Clerk of Lake Charles City Court on this date to request removal of fees and costs that were entered after the Court was divested of jurisdiction on December 3 2024. The Clerk refused and stated that Judge Ronald C Richard is demanding that Plaintiff pay these fees.

All fees assessed after December 3 2024 are void under Louisiana Code of Civil Procedure article 2088. The Court lacked authority to issue orders hold hearings generate service returns or impose costs. Plaintiff has never provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and any fees based on those returns are fraudulent and unenforceable.

The Clerk refusal to remove void fees and the judge ongoing demand for payment constitute retaliation intimidation and abuse of authority. Plaintiff submits this Notice to ensure the record reflects that Plaintiff has objected to all post divestiture fees and that any attempt to enforce them now or in the future is unlawful and constitutes retaliation under state and federal law.

Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

ELECTRONIC

FILE DATE: 11-13-2025

Notice of Correction of False Addresses and Appellate Misrepresentations

Plaintiff submits this Notice to correct multiple inaccuracies and fabricated statements that appear in the record. Plaintiff has never lived in or provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and all fees assessed for service at that location were created without factual basis and must be removed immediately.

Additionally statements made by attorney Mr Bauman regarding the location of a homicide are false. The incident referenced in the appellate filings occurred in Houston Texas not Iowa Louisiana. The claim that Plaintiff spouse called helicopters is also false and unsupported. These misrepresentations distorted the appellate record and contributed to inflated court costs and retaliatory actions taken by the Court.

Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

ELECTRONIC

FILE DATE: 11-13-2025

Monica Abshire

From: Monica Abshire
Sent: Friday, November 14, 2025 7:36 AM
To: truekingfile@gmail.com
Subject: Emailing: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax
Attachments: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax.pdf

Please see attached the Affidavit of Transmission on Supplemental Fax to 11/13/2025 filings.

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King v Amos - Affidavit of Transmission - Supp. Fax

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Affidavit of Transmission

Attention: John C King Sr Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C King Sr vs Renee Amos – 4 pages received – Notice of Lack of Jurisdiction and Divestiture Confirmation; Emergency Notice of Prohibited Fee Enforcement; Notice of Correction of False Addresses and Appellate Misrepresentations

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

FAX COVER SHEET

TO	Clerk Abshire
COMPANY	
FAX NUMBER	3374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 12:40:05
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is a fax

23-2124 COVER LETTER

TO CLERK OF COURT

LAKE CHARLES CITY COURT WARD THREE

Please file the enclosed Motion Proposed Order and Certificate of Service in Case Number 23 2124 King versus Amos.

Respectfully

John C King Sr

Combined Motion to Vacate Divested Orders

NO 23 2124

CITY COURT OF LAKE CHARLES

WARD THREE

CALCASIEU PARISH LOUISIANA

JOHN C KING SR

Plaintiff

versus

RENEE AMOS AND THE HARTFORD

Defendants

Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard

Plaintiff John C King Sr submits this motion to preserve all rights before the statutory deadline. Plaintiff requests that the Court vacate all actions taken after divestiture of jurisdiction remove all improper and retaliatory costs strike all contempt related actions seal identifying information and recuse Judge Ronald C Richard due to bias hostility and misconduct.

Background

Plaintiff is the sole plaintiff in this matter. His spouse S J K has never been a party to this case. Judge Richard nevertheless ordered her to appear in court without jurisdiction service or lawful authority. She is a non resident and a protected crime victim.

Summary of Misconduct

Judge Richard did the following

Accused spouse of practicing law without basis.

Forced a non resident non party to appear under threat.

Threatened to send the District Attorney across state lines.

Denied Plaintiff and spouse access to legal counsel.

ELECTRONIC

FILE DATE: 11-13-2025

Forced disabled spouse to remain without medical accommodation.

Ordered courtroom doors locked during the November 2024 hearing.

Read spouse private address into the public record.

Created circumstances leading to a December 11 2024 intruder incident in Houston Texas.

Lost jurisdiction on December 3 2024 under article 2088.

Held hearings on December 18 and December 30 after divestiture.

Rescinded pauper status without a contradictory hearing.

Created fabricated Iowa Louisiana service addresses and false fees.

Issued retaliatory contempt without cause or notice.

Allowed false appellate statements by Mr Bauman including a false claim the homicide occurred in Iowa Louisiana.

Ignored that neither of Plaintiff parents ever lived in Iowa Louisiana.

Legal Basis

Orders after December 3 2024 are null under article 2088.

Recusal required under article 151.

Constitutional violations include amendments One Four and Fourteen.

Misconduct violates Louisiana Revised Statutes 14 134 14 118 14 122.

Disability protections under ADA Title Two were violated.

Victim protections under Louisiana and federal law were violated.

Relief Requested

Recusal of Judge Ronald C Richard.

Vacatur of all orders rulings costs and contempt actions after December 3 2024.

Removal of all fabricated service fees linked to Iowa Louisiana addresses.

Sealing of any document that contains Plaintiff or spouse identifying information.

Reassignment to an impartial judge.

Any further relief necessary to protect Plaintiff from retaliation.

Respectfully submitted

John C King Sr

123 N Louisiana Avenue

Lake Charles Louisiana 70601

Certificate of Service

I certify that a copy of this motion was served on all parties by email on this date.

Signed John C King Sr

23-2124 CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I certify that the Combined Motion Proposed Order and Cover Letter were served via email on all parties on November 13 2025.

Signed

Verified by pdfFiller
11/13/2025

John C King Sr

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

ACTS FAX

ACTS FAX **ACTS FAX ACTS** FAX **ACTS** FAX

ACTS FAX

DATE:

02/06/2025

From:

Heather Goleman, Deputy Clerk

(337) 433-9403

SUBJECT: **Louisiana** 3rd **Circuit Case** No. **CW** 25 **00044**

Lower Court Case No.: 2023-2124

Calcasieu

Fourteenth Judicial **District** C

To:

JOHN CLIFFORD J. KING VERSUS

RENEE AMOS NOTARY **PUBLIC**

ID #29374 **AND HARTFORD**

FIRE **INSURANCE** COMPANY

Hon. Ronald C. Richard Attorney at Law
330 Alamo Street
Lake Charles, LA 70601 Fax No.
(337) 494-1793 Work No. (337)
494-1900

Oliver Jackson Schrumpf Schrumpf &
Schrumpf 3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

LZS-1 8000/10ood L6Z-1

0697-161-*L88*

01001 PAY MORE 90:60 92-90-20

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson
Schrumpf

Edward Kelly Bauman

Counsel for:
John Clifford J. King

Counsel for:
Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider... motions [regarding pauper status]" Mason v. *Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v.* Ferrington, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of *the* order of appeal, the trial court does not have jurisdiction to hear *the* pro se motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

LZ8-1 8000/2000d 163-1

0692-167-188

o PAY WOUD 90:60 92-90-20

SIZ SJG

JWP

Affidavit of Transmission

Attention: John C. King Sr

Fax No. 508-524-2132

Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C. King Sr vs. Renee Amos – 12 pages received – Combined Motion to Vacate Divested Orders

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

Monica Abshire

From: Monica Abshire
Sent: Thursday, November 13, 2025 4:01 PM
To: True King
Subject: Emailing: 23-2124 King vs Amos - Affidavit of Transmission
Attachments: 23-2124 King vs Amos - Affidavit of Transmission.pdf

Please see attached the Affidavit of Transmission.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs Amos - Affidavit of Transmission

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

Person Name: JONES, LANICIA SHUNTE
, Category: VICTIM, Date Birth: 02/26/1984, Age Min: [redacted] Age Max: 0
, Sex: F, Race: B, Ethnicity: , Height: 505, Weight: 155, License State: TX, License_Number:
[redacted]
Business Name:

Tag: TX K90THP PC [redacted] VIN: [redacted]
Make: STRN Model: Year: [redacted] Color: PLE
Business: BEATY, CALVIN R & SHANNON D
Name: ,
Comments: TOMBALL COLLISION // FEB/03//5703 HEATHERBLOOM DR,HOUSTON,TX 77085

Complaint Type: ASSAULT - ASSAULT
Caller Name: [redacted]
Officer ID: MHANNSZ, Officer Name: MARK HANNSZ

[redacted] 00:41:35 : ssmith]
NEXT WRECKER/ 643 ON SCENE

[redacted] 00:27:19 : ssmith]
643 AT 5451

[redacted] 00:14:22 : ssmith]
DET TOOMBS CONTACTED, PER SGT HAMMOND/ HE WILL BE ENRT

[redacted] 00:11:58 : bbenton]
K90THP

[redacted] 00:02:48 : bbenton]
15770216

[redacted] 23:59:12 : ssmith]
VEH WAS AT ULRICH & ZION/ SEEN BY 635/ NO DIRECTION OF TRAVEL

[redacted] 23:57:50 : ssmith]
DK COLORED HONDA ACCORD

[redacted] 23:57:09 : ssmith]
630 ADVISED DRIVE-BY SHOOTING

[redacted] 23:56:30 : ssmith]
CALLER HAS GUNSHOT WOUND IN LEG, PER EMS//

[10/11/2004 23:55:22 : ssmith]
EMS SUPERVISOR IN FRT OF [redacted] AT THIS TIME, PER 625

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #.	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

[redacted] 23:53:59 : ssmith]
CALLER SAYS SHE'S BEEN SHOT/EMS ENRT

[redacted] 23:53:01 : ssmith]
PURPLE STRN/ FEMALE CALLER IS CRYING/BLEEDING

CASE#:
[redacted]04-002490

REPORTING OFFICER:
M. HANNSZUNIT 635

LOCATION:
13800 BLK OF ZION, TOMBALL, HARRIS COUNTY, TEXAS 77375

INTRODUCTION:
[redacted] AT APPROXIMATELY 2351 HOURS I OFFICER HANNSZ WAS DISPATCHED TO THE AREA OF TOMBALL HIGH SCHOOL FOR A REPORTED PERSON IN A PURPLE [redacted] SATURN FOUR DOOR WHO WAS BLEEDING. I ARRIVED IN THE AREA AND LOCATED THE VEHICLE PARKED IN THE DRIVE WAY OF TOMBALL JR. HIGH SCHOOL IN THE 13800 BLK OF ZION. THE VEHICLE WAS PARKED FACING EAST WITH THE HEADLIGHTS AND EMERGENCY FLASHERS ON. THERE WAS A FEMALE SUBJECT SITTING IN THE DRIVERS SEAT OF THE VEHICLE WAVING AT ME. I ADVISED DISPATCH THAT I HAD ARRIVED AND THE LOCATION OF THE VEHICLE.

SCENE SUMMARY:
THE 13800 BLOCK OF ZION IS LOCATED WEST OF THE INTERSECTION OF QUINN AND ZION. THE SCENE IS IN THE WESTERN MOST DRIVEWAY FOR [redacted] TOMBALL JR. HIGH SCHOOL OFF OF ZION.

REAL EVIDENCE:
A PURPLE [redacted] FOUR DOOR BEARING TX LP [redacted] TO BE PROCESSED BY CID/CSI UNIT.

DETAILS OF OFFENSE:
I EXITED MY PATROL VEHICLE AND APPROACHED THE DISTRAUGHT FEMALE DRIVER. AS I APPROACHED I OBSERVED THAT SHE WAS ON THE PHONE AND VERY HISTERICAL. I SAW BLOOD POOLOING ON THE DRIVERS FLOOR BOARD. I OBSERVED WHAT LOOKED LIKE A PUNCTURE WOUND THE SIZE OF A PENCILE. THERE WAS A STEADY DRIPPING OF BLOOD COMING FROM HER WOUND I ADVISED DISPATCH VIA RAIDO THAT I NEEDED EMS FOR WHAT APPEARED TO BE A GUN SHOT WOUND TO THE LEFT CALF. I ADVISED THE VICTIM THAT I WAS GOING TO MY CAR TO GET MY FIRST AID KIT AND WOULD BE BACK IN A MOMENT. I RETURNED TO MY VEHICLE AND DAWNED MY RUBBER GLOVES AND GOT SOME GAUZE TO PLACE ON THE WOUNDS UNTIL EMS ARRIVED. I THEN RETURNED TO

LOCATION
OFFENSE
VICTIM
ADMIN

INCIDENT REPORT

LOCATION

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted]

DATE(S) OF INCIDENT: TIME(S) OF INCIDENT:	REPORT TYPE	INCIDENT STATUS	EXCEPTIONAL CLEARANCE DATE	EXCEPTIONAL CLEARANCE
Start 10-11-[redacted] Start 23:51 End 10-11-[redacted] End 23:51	☑ INITIAL REPORT ☐ SUPPLEMENT	☐ UNFOUNDED ☐ CLEARED BY ARREST ☐ CLEARED EXCEPTIONAL ☐ PENDING ☑ INACTIVE		

LOCATION OF INCIDENT	COUNTY CODE	WEATHER:	LIGHTING:
13800 ZION	101	1 CLEAR	DARK (STREET LAMP LIT)

OFFENSE

	Statute / UCR CODE	Statute DESCRIPTION / UCR CODE DESCRIPTION	CJIS	STATUS COMPLETED	STATUS ATTEMPTED	OFFENDER
1	22.02(a)(2) 13A	AGG ASSLT W/DEADLY WEAPON 13A AGGRAVATED ASSAULT	13150005	☑	☐	UNKNOWN,
2				☐	☐	
3				☐	☐	

BIAS MOTIVATION (OFFENSE 1 - 3)
1 88 NONE (NO BIAS)
2
3

LOCATION OF OFFENSE (OFFENSE 1 - 3)
1 13800 BLK ZION
2
3

TYPE CRIMINAL ACTIVITY:
1
2
3

TYPE WEAPON/FORCE INVOLVED
1 11 FIREARM ☐ AUTOMATIC
2 ☐ AUTOMATIC
3 ☐ AUTOMATIC

(For Burglary Only) NUMBER OF PREMISES ENTERED: 0

METHOD OF ENTRY: F ☐ FORCIBLE; N ☑ NO FORCE

OFFENDER(S) USED: A ☐ ALCOHOL; C ☐ COMPUTER EQUIP; D ☐ DRUGS

☐ CARGO THEFT

VICTIM

VICTIM NAME: JONES, LANICIA SHUNTE PHONE: [redacted]

ADDRESS (Street, City, State, Zip): [redacted]

TYPE OF VICTIM	RACE:	SEX:	RESIDENT STATUS:	ETHNICITY:	AGE:
I PERSON/INDIVIDUAL (NOT A LAW ENFORCEMENT OFFICER)	BLACK/AFRICAN AMERICAN	FEMALE	N NON RESIDENT	N NOT HISPANIC/LATI	DOB: 02/26/1984 CONNECTED TO OFFENSE: 13A

AGGRAVATED ASSAULT CIRCUMSTANCES
1 10 UNKNOWN CIRCUMSTANCES
2

JUSTIFIABLE HOMICIDE CIRCUMSTANCE

INJURY TYPE
B ☐ BROKEN BONES; I ☐ POSS. INT INJURIES; L ☐ SEVERE LACERATION; U ☐ UNCONSCIOUSNESS
N ☐ NONE; M ☐ MINOR INJURY; O ☑ MAJOR INJURY; T ☐ LOSS OF TEETH

RELATIONSHIP OF VICTIM TO OFFENDER 1 - 10
1 2 3 4 5
6 7 8 9 10

ADMIN

REPORTING OFFICER	ID	DATE	REPORTING OFFICER SIGNATURE
HANNSZ, MARK	5811	[redacted]	

APPROVING SUPERVISOR	ID	DATE	APPROVING SUPERVISION SIGNATURE

INVESTIGATOR	ID	ASSISTING OFFICER	ID	ASSISTING OFFICER	ID
TOOMBS, DANNY	1528	GORMAN, VIRGINIA	3736	STACHMUS, FRANK	9613

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

THE VICTIM AND PLACED PRESSURE ON HER WOUND. I THEN NOTICED THAT THERE WAS A SECOND WOUND ON THE INNER CALF. I THEN APLLIED PRESSURE TO BOTH WOUNDS UNTIL EMS ARRIVED.

OFFICER GORMAN ARRIVED ON SCENE AND BEGAN GATHERING INFORMATION FROM THE VICTIM. SHE WAS IDENTIFIED BY HER TX DL AS JONES, LANICIA SHUNTE B/F 02/26/1984.

SGT. STACHMUS ARRIVED ON SCENE, MADE OBSERVATION OF THE SITUATION AND CONTACTED LT. SOLOMON VIA TELEPHONE AND ADVISED HIM OF THE SITIUATION AT HAND. LT. SOLOMON ADVISED SGT. STACHMUS TO CONTACT CID SGT. HAMMOND. SGT. HAMMOND THEN HAD DETECTIVE TOOMBS DISPATCHED TO THE SCENE FOR INVESTIGATION PURPOSES.

INVESTIGATOR TOOMBS ARRIVED ON SCENE AND MADE THE DETERMINATION THAT WE WOULD HAVE THE VEHICLE TOWED AND PLACED WITH AN IVESTIGATIVE HOLD. I THEN ADVISED DISPATCH TO SEND ME THE NEXT ROTATION WRECKER. THEY ADVISED THAT TOMBALL COLLISION WOULD BE ENROUTE.

I INVENTORIED THE VEHICLE AND LOCATED THE VICTIMS WALLET ON THE PASSENGER SIDE OF THE VEHICLE. I PLACED THE WALLET INTO MY PATROL CAR AND RELEASED THE VEHICLE TO THE DRIVER FOR TOMBALL COLLISION.

I ADVISED DISPATCH THAT I WOULD BE CLEAR FROM THE SCENE AND ENROUTE TO TOMBALL REGIONAL HOSPITAL TO FOLLOW UP ON THIS CASE AND DELIVER THE VICTIMS PROPERTY TO HER. I ARRIVED AT THE HOSPITAL AND MET WITH DETECTIVE TOOMBS AND OFFICER GORMAN. OFFICER GORMAN HAD ALREADY OBTAINED ALL THE INFORMATION FROM THE VICTIM SHE COULD BEFORE THE HOSPITAL STAFF MEDICATED HER. I RETURNED THE PROPERTY TO THE VICTIMS SISTER AND DETECTIVE TOOMBS SPOKE WITH HER ADVISING HER TO HAVE HER SISTER CONTACT HIM AS SOON AS SHE GATHERED HERSELF AAND COULD TELL US WHAT HAD HAPPENED.

I THEN CLEARED THE SCENE AND RETURNED TO THE TOMBALL POLICE DEPARTMENT FOR THIS REPORT.

COMPLAINANT/VICTIM
JONES, LANICIA SHUNTE B/F 02/26/1984

SUSPECT:
UNKNOWN AT THIS TIME

VEHICLE INVOLVED:
A PURPLE [redacted] BEARING TX/LP [redacted]

TOWED BY:

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

SUPPLEMENT

CASE NUMBER: 04-002490

[redacted]. AT APPROXIMATELY 2351 HRS., I OFFICER GORMAN RESPONDED TO CALL WITH OFFICER HANNSZ REGARDING A SUBJECT BLEEDING IN A VEHICLE ON ZION ROAD. UPON MY ARRIVAL OFFICER HANNSZ WAS ON LOCATION ASSISTING THE VICTIM, LANICIA SHUNTE JONES. MS. JONES WAS VERY UPSET, HYSTERICAL, STATING THAT SHE HAD BEEN SHOT. I OBSERVED A SMALL ROUND WOUND ON MS. JONES'S LEFT LEG AND BLOOD ON THE FLOOR BOARD OF THE VEHICLE. MS. JONES STATED AT THE SCENE THAT WHILE SHE WAS [redacted] MS. JONES POINTS IN THE DIRECTION OF TOMBALL HILLS. MS. JONES STATED AT THE SCENE THAT SHE DID NOT KNOW WHO COULD HAVE SHOT HER, BUT THAT SHE HAD SEEN A VEHICLE TRAVELING EAST BOUND LEAVING JUST AFTER SHE HEARD A LOUD POP. MS. JONES THOUGHT THAT SHE HAD [redacted]

NORTH WEST EMS ARRIVED AND TRANSPORTED MS. JONES TO TOMBALL HOSPITAL. I WAS TOLD BY SGT. STACHMUS TO MEET WITH MS. JONES AT THE TOMBALL HOSPITAL TO TRY AND GET ADDITIONAL INFORMATION.

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INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

SUPPLEMENT

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DISPOSITION.
REFERRED TO INVESTIGATIONS

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[redacted]-002490
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04-002490
D.R.TOOMBS

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SUPPLEMENT

04-002490
D R TOOMBS

[redacted] MS. JONES WAS TO COME TO THE POLICE STATION AT 400PM THIS DATE. AT 4:30PM MS. JONES CALLED AND SAID SHE WOULD NOT BE COMING TO THE STATION BECAUSE HER [redacted] HURT, AND IT [redacted] I ASKED MS. JONES TO TELL ME WHERE SHE WAS WHEN THE TWO [redacted], SHE SAID, SHE WAS JUST PASSING THE ENTRANCE TO NORTH STAR SUBDIVISION. THIS WOULD BE EAST OF THE ENTRANCE ON ZION RD. MS. JONES SAID, ALL SHE CAN REMEMBER OF THE [redacted] IT WAS DARK IN COLOR, AND LOOKED LIKE A DODGE [redacted], OR SOMETHING LIKE THAT. I ADVISED MS.JONES THAT I HAD COMPLETED PROCESSING HER VEHICLE, AND SHE COULD CLAIM IT FROM TOMBALL COLLISION.
I WILL RETURN TO ZION RD. ON [redacted] AND CHECK THE AREA FOR MORE POSSIBLE EVIDENCE.

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TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

Person Name: JONES, LANICIA SHUNTE
, Category: VICTIM, Date Birth: 02/26/1984, Age Min: [redacted] Age Max: 0
, Sex: F, Race: B, Ethnicity: , Height: 505, Weight: 155, License State: TX, License_Number:
[redacted]
Business Name:

Tag: TX K90THP PC [redacted] VIN: [redacted]
Make: STRN Model: Year: [redacted] Color: PLE
Business: BEATY, CALVIN R & SHANNON D
Name: ,
Comments: TOMBALL COLLISION // FEB/03//5703 HEATHERBLOOM DR,HOUSTON,TX 77085

Complaint Type: ASSAULT - ASSAULT
Caller Name: [redacted]
Officer ID: MHANNSZ, Officer Name: MARK HANNSZ

[redacted] 00:41:35 : ssmith]
NEXT WRECKER/ 643 ON SCENE

[redacted] 00:27:19 : ssmith]
643 AT 5451

[redacted] 00:14:22 : ssmith]
DET TOOMBS CONTACTED, PER SGT HAMMOND/ HE WILL BE ENRT

[redacted] 00:11:58 : bbenton]
K90THP

[redacted] 00:02:48 : bbenton]
15770216

[redacted] 23:59:12 : ssmith]
VEH WAS AT ULRICH & ZION/ SEEN BY 635/ NO DIRECTION OF TRAVEL

[redacted] 23:57:50 : ssmith]
DK COLORED HONDA ACCORD

[redacted] 23:57:09 : ssmith]
630 ADVISED DRIVE-BY SHOOTING

[redacted] 23:56:30 : ssmith]
CALLER HAS GUNSHOT WOUND IN LEG, PER EMS//

[10/11/2004 23:55:22 : ssmith]
EMS SUPERVISOR IN FRT OF [redacted] AT THIS TIME, PER 625

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04-002490

[redacted] 23:53:59 : ssmith]
CALLER SAYS SHE'S BEEN SHOT/EMS ENRT

[redacted] 23:53:01 : ssmith]
PURPLE STRN/ FEMALE CALLER IS CRYING/BLEEDING

CASE#:
[redacted]04-002490

REPORTING OFFICER:
M. HANNSZUNIT 635

LOCATION:
13800 BLK OF ZION, TOMBALL, HARRIS COUNTY, TEXAS 77375

INTRODUCTION:
[redacted] AT APPROXIMATELY 2351 HOURS I OFFICER HANNSZ WAS DISPATCHED TO THE AREA OF TOMBALL HIGH SCHOOL FOR A REPORTED PERSON IN A PURPLE [redacted] SATURN FOUR DOOR WHO WAS BLEEDING. I ARRIVED IN THE AREA AND LOCATED THE VEHICLE PARKED IN THE DRIVE WAY OF TOMBALL JR. HIGH SCHOOL IN THE 13800 BLK OF ZION. THE VEHICLE WAS PARKED FACING EAST WITH THE HEADLIGHTS AND EMERGENCY FLASHERS ON. THERE WAS A FEMALE SUBJECT SITTING IN THE DRIVERS SEAT OF THE VEHICLE WAVING AT ME. I ADVISED DISPATCH THAT I HAD ARRIVED AND THE LOCATION OF THE VEHICLE.

SCENE SUMMARY:
THE 13800 BLOCK OF ZION IS LOCATED WEST OF THE INTERSECTION OF QUINN AND ZION. THE SCENE IS IN THE WESTERN MOST DRIVEWAY FOR [redacted] TOMBALL JR. HIGH SCHOOL OFF OF ZION.

REAL EVIDENCE:
A PURPLE [redacted] FOUR DOOR BEARING TX LP [redacted] TO BE PROCESSED BY CID/CSI UNIT.

DETAILS OF OFFENSE:
I EXITED MY PATROL VEHICLE AND APPROACHED THE DISTRAUGHT FEMALE DRIVER. AS I APPROACHED I OBSERVED THAT SHE WAS ON THE PHONE AND VERY HISTERICAL. I SAW BLOOD POOLOING ON THE DRIVERS FLOOR BOARD. I OBSERVED WHAT LOOKED LIKE A PUNCTURE WOUND THE SIZE OF A PENCILE. THERE WAS A STEADY DRIPPING OF BLOOD COMING FROM HER WOUND I ADVISED DISPATCH VIA RAIDO THAT I NEEDED EMS FOR WHAT APPEARED TO BE A GUN SHOT WOUND TO THE LEFT CALF. I ADVISED THE VICTIM THAT I WAS GOING TO MY CAR TO GET MY FIRST AID KIT AND WOULD BE BACK IN A MOMENT. I RETURNED TO MY VEHICLE AND DAWNED MY RUBBER GLOVES AND GOT SOME GAUZE TO PLACE ON THE WOUNDS UNTIL EMS ARRIVED. I THEN RETURNED TO

LOCATION
OFFENSE
VICTIM
ADMIN

INCIDENT REPORT

LOCATION

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted]

DATE(S) OF INCIDENT: TIME(S) OF INCIDENT:	REPORT TYPE	INCIDENT STATUS	EXCEPTIONAL CLEARANCE DATE	EXCEPTIONAL CLEARANCE
Start 10-11-[redacted] Start 23:51 End 10-11-[redacted] End 23:51	☑ INITIAL REPORT ☐ SUPPLEMENT	☐ UNFOUNDED ☐ CLEARED BY ARREST ☐ CLEARED EXCEPTIONAL ☐ PENDING ☑ INACTIVE		

LOCATION OF INCIDENT	COUNTY CODE	WEATHER:	LIGHTING:
13800 ZION	101	1 CLEAR	DARK (STREET LAMP LIT)

OFFENSE

	Statute / UCR CODE	Statute DESCRIPTION / UCR CODE DESCRIPTION	CJIS	STATUS COMPLETED	STATUS ATTEMPTED	OFFENDER
1	22.02(a)(2) 13A	AGG ASSLT W/DEADLY WEAPON 13A AGGRAVATED ASSAULT	13150005	☑	☐	UNKNOWN,
2				☐	☐	
3				☐	☐	

BIAS MOTIVATION (OFFENSE 1 - 3)
1 88 NONE (NO BIAS)
2
3

LOCATION OF OFFENSE (OFFENSE 1 - 3)
1 13800 BLK ZION
2
3

TYPE CRIMINAL ACTIVITY:
1
2
3

TYPE WEAPON/FORCE INVOLVED
1 11 FIREARM ☐ AUTOMATIC
2 ☐ AUTOMATIC
3 ☐ AUTOMATIC

(For Burglary Only) NUMBER OF PREMISES ENTERED: 0

METHOD OF ENTRY: F ☐ FORCIBLE; N ☑ NO FORCE

OFFENDER(S) USED: A ☐ ALCOHOL; C ☐ COMPUTER EQUIP; D ☐ DRUGS

☐ CARGO THEFT

VICTIM

VICTIM NAME: JONES, LANICIA SHUNTE PHONE: [redacted]

ADDRESS (Street, City, State, Zip): [redacted]

TYPE OF VICTIM	RACE:	SEX:	RESIDENT STATUS:	ETHNICITY:	AGE:
I PERSON/INDIVIDUAL (NOT A LAW ENFORCEMENT OFFICER)	BLACK/AFRICAN AMERICAN	FEMALE	N NON RESIDENT	N NOT HISPANIC/LATI	DOB: 02/26/1984 CONNECTED TO OFFENSE: 13A

AGGRAVATED ASSAULT CIRCUMSTANCES
1 10 UNKNOWN CIRCUMSTANCES
2

JUSTIFIABLE HOMICIDE CIRCUMSTANCE

INJURY TYPE
B ☐ BROKEN BONES; I ☐ POSS. INT INJURIES; L ☐ SEVERE LACERATION; U ☐ UNCONSCIOUSNESS
N ☐ NONE; M ☐ MINOR INJURY; O ☑ MAJOR INJURY; T ☐ LOSS OF TEETH

RELATIONSHIP OF VICTIM TO OFFENDER 1 - 10
1 2 3 4 5
6 7 8 9 10

ADMIN

REPORTING OFFICER	ID	DATE	REPORTING OFFICER SIGNATURE
HANNSZ, MARK	5811	[redacted]	

APPROVING SUPERVISOR	ID	DATE	APPROVING SUPERVISION SIGNATURE

INVESTIGATOR	ID	ASSISTING OFFICER	ID	ASSISTING OFFICER	ID
TOOMBS, DANNY	1528	GORMAN, VIRGINIA	3736	STACHMUS, FRANK	9613

INCIDENT REPORT
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THE VICTIM AND PLACED PRESSURE ON HER WOUND. I THEN NOTICED THAT THERE WAS A SECOND WOUND ON THE INNER CALF. I THEN APLLIED PRESSURE TO BOTH WOUNDS UNTIL EMS ARRIVED.

OFFICER GORMAN ARRIVED ON SCENE AND BEGAN GATHERING INFORMATION FROM THE VICTIM. SHE WAS IDENTIFIED BY HER TX DL AS JONES, LANICIA SHUNTE B/F 02/26/1984.

SGT. STACHMUS ARRIVED ON SCENE, MADE OBSERVATION OF THE SITUATION AND CONTACTED LT. SOLOMON VIA TELEPHONE AND ADVISED HIM OF THE SITIUATION AT HAND. LT. SOLOMON ADVISED SGT. STACHMUS TO CONTACT CID SGT. HAMMOND. SGT. HAMMOND THEN HAD DETECTIVE TOOMBS DISPATCHED TO THE SCENE FOR INVESTIGATION PURPOSES.

INVESTIGATOR TOOMBS ARRIVED ON SCENE AND MADE THE DETERMINATION THAT WE WOULD HAVE THE VEHICLE TOWED AND PLACED WITH AN IVESTIGATIVE HOLD. I THEN ADVISED DISPATCH TO SEND ME THE NEXT ROTATION WRECKER. THEY ADVISED THAT TOMBALL COLLISION WOULD BE ENROUTE.

I INVENTORIED THE VEHICLE AND LOCATED THE VICTIMS WALLET ON THE PASSENGER SIDE OF THE VEHICLE. I PLACED THE WALLET INTO MY PATROL CAR AND RELEASED THE VEHICLE TO THE DRIVER FOR TOMBALL COLLISION.

I ADVISED DISPATCH THAT I WOULD BE CLEAR FROM THE SCENE AND ENROUTE TO TOMBALL REGIONAL HOSPITAL TO FOLLOW UP ON THIS CASE AND DELIVER THE VICTIMS PROPERTY TO HER. I ARRIVED AT THE HOSPITAL AND MET WITH DETECTIVE TOOMBS AND OFFICER GORMAN. OFFICER GORMAN HAD ALREADY OBTAINED ALL THE INFORMATION FROM THE VICTIM SHE COULD BEFORE THE HOSPITAL STAFF MEDICATED HER. I RETURNED THE PROPERTY TO THE VICTIMS SISTER AND DETECTIVE TOOMBS SPOKE WITH HER ADVISING HER TO HAVE HER SISTER CONTACT HIM AS SOON AS SHE GATHERED HERSELF AAND COULD TELL US WHAT HAD HAPPENED.

I THEN CLEARED THE SCENE AND RETURNED TO THE TOMBALL POLICE DEPARTMENT FOR THIS REPORT.

COMPLAINANT/VICTIM
JONES, LANICIA SHUNTE B/F 02/26/1984

SUSPECT:
UNKNOWN AT THIS TIME

VEHICLE INVOLVED:
A PURPLE [redacted] BEARING TX/LP [redacted]

TOWED BY:

INCIDENT REPORT
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04-002490
D R TOOMBS

[redacted] MS. JONES WAS TO COME TO THE POLICE STATION AT 400PM THIS DATE. AT 4:30PM MS. JONES CALLED AND SAID SHE WOULD NOT BE COMING TO THE STATION BECAUSE HER [redacted] HURT, AND IT [redacted] I ASKED MS. JONES TO TELL ME WHERE SHE WAS WHEN THE TWO [redacted], SHE SAID, SHE WAS JUST PASSING THE ENTRANCE TO NORTH STAR SUBDIVISION. THIS WOULD BE EAST OF THE ENTRANCE ON ZION RD. MS. JONES SAID, ALL SHE CAN REMEMBER OF THE [redacted] IT WAS DARK IN COLOR, AND LOOKED LIKE A DODGE [redacted], OR SOMETHING LIKE THAT. I ADVISED MS.JONES THAT I HAD COMPLETED PROCESSING HER VEHICLE, AND SHE COULD CLAIM IT FROM TOMBALL COLLISION.
I WILL RETURN TO ZION RD. ON [redacted] AND CHECK THE AREA FOR MORE POSSIBLE EVIDENCE.

ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX -

DATE: 02/06/2025

From: Heather Goleman, Deputy Clerk
(337) 433-9403

SUBJECT: Louisiana 3rd Circuit - Case No. CW 25 00044
Lower Court Case No.: 2023-2124
Calcasieu
Fourteenth Judicial District C

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

To: Hon. Ronald C. Richard
Attorney at Law
330 Alamo Street
Lake Charles, LA 70601
Fax No. (337) 494-1793
Work No. (337) 494-1900

Oliver Jackson Schrumpf
Schrumpf & Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson Schrumpf	Counsel for: John Clifford J. King
Edward Kelly Bauman	Counsel for: Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, . . . on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider . . . motions [regarding pauper status]" *Mason v. Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v. Ferrington*, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of the order of appeal, the trial court does not have jurisdiction to hear the pro se

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0002/0003 F-327

motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

SJG	JWP	CD

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0003/0003 F-327

King Continuance Confidential Medical Record. Motions to Dismiss Untimely filed motions

From: True King <truekingfile@gmail.com>

To: kay.bang@lccitycourt.org

Cc: KAMIE DOMINIC <kamiedominiclaw@gmail.com>, John King <johncjking86@gmail.com>

Date: Mon, 04 Nov 2024 17:51:13 -0500

Attachments:
23-2124 Redd Exhibits Amos (1).pdf
signed Not23-2124.pdf
LASAS # 380702-01 DCFS harassment.pdf
Charmaine USPS Harassment.pdf
Screenshot 2024-11-04 5.49.18 PM.png

Ms Bang, Honorable Judge
Attached you will find motion for continuance, motions to strike, motions to Quash.In addition to attached motions and medical chart provided by cancer center, ambulance transport, hospital admission and discharge, muscular skeletal and discharge you will find physical copies in the mail. Hon Judge Redd has helped me learn a great deal, and he will observe that Ms Kamie Dominic is not compliant with civil procedure. The motion she filed on Thursday October 31, has to be filed with the clerk's office and served upon me via email or in person 15 days prior to trial date and since Friday was a legal holiday she said on Friday Nov 1 2024 that she was only required to provide a courtesy copy. She is mistaken only in juvenile and family court that exception is permitted and per her filing last spring she refused to allow evidence or motions citing that they were untimely filed. Although she was served. I'm doing the best I can prove and am under intense harassment from a stalker who will not leave me alone.The following exhibits should clear up any lies told by the defendant and anyone calling on their behalf and I will be using all evidence to appeal this case if necessary until justice prevails and the law is followed. Colston and Amos have yet to provide a single exhibit or present a witness or even say they didn't do it. Ms Dominic aims to play politics and feels confident that Judge Richard doesnt want Ms Amos to suffer for AMos actions I assure you in the evidence you will no longer presume Amos as innocent she has done this before and their attempts to discredit a father who is a victim does not change that Im owed damages and have suffered enough from their games and lies. I'm asking that the playing field and any biases Dominic feels will weigh in her favor be disregarded and this case start over with full facts and justice.

Additionally we are requesting that medical records be sealed as you can see by the petition and is confirmed on the transaction Record Charmaine Y Colston has a disturbing history of continued harassment stalking and obsession and in March 2024 Charmaine Colston is on your

record on transactions for this case requesting conformed copies although her attorney later the next month said Charmaine could not be served and was irrelevant to the proceedings. This stalking caught on record further reiterates my need for protection of medical records as she also placed my former medical records from my neurosurgeon on facebook taunting my mother that I was going to die and she was going to collect all of the insurance money. This caused medical responses for my grandmother, illness for my mother and traumatic for my children and provoked more seizures. Judge Redd my medical was submitted as further proof of my cooperation and to dispute the disgraceful claims made by Kamie Dominic stating that my medical condition wasn't severe and or wasn't legitimate although in my motion for continuance I meet the Louisiana requirements for continuance based on medical emergency. Please note that previous records and exhibits of my degenerative condition were provided to you last year. Ive been discharged twice in the last 4 weeks and currently discharged unto a rolling walker and provided video of the therapy on the walker. Neurosurgeons are backed up and there is a shortage so I have appointments tomorrow and november 13 and in outpatient physical therapy and in treatment. This spinal cord injury and the permanent damage that followed is a result of the stalking and non stop harassment of Charmaine Colston she in one of many fake hospital emergencies told me my son was having emergency surgery and would die and i needed to rush back to Lake Charles from work in NJ I slipped and fell on the ice and lay there until my wife found me in the parking lot by my truck the compression from the fall leads to permanent damage after 24-48 hours and at the time I had no health insurance this was months before she stole the car. She runs around obtaining files and mailing them anonymously to my mother, upset and bragging about my death on facebook this is sickening behavior. I have been a victim of domestic violence repeatedly for over ten years and it is sexist and shameful that Ms Dominic would make a mockery of my disability by referring to Colston as a paramour. Its the equivalent of having female a rape victim referring to her attacker as a paramlour and I will be asking that the traumatizing misrepresentation be stricken from the record. It's time that the bullying and her back room efforts to undermine justice stop and that the truth of this fraudulent transaction come to light. The only reason the intense extent was not revealed earlier is because I was in custody proceedings and as you can tell from the attachments my concerns are warranted and she and Ms Amos were well aware I wasnt in the state at the time as I was not even able to fly the month and day the fraud occurred and had just finished a critical medical procedure in my spine this too will be introduced as previously I needed proof that she was accessing these case files for her own harassment and obsession. Your record on this case clearly show I am telling the

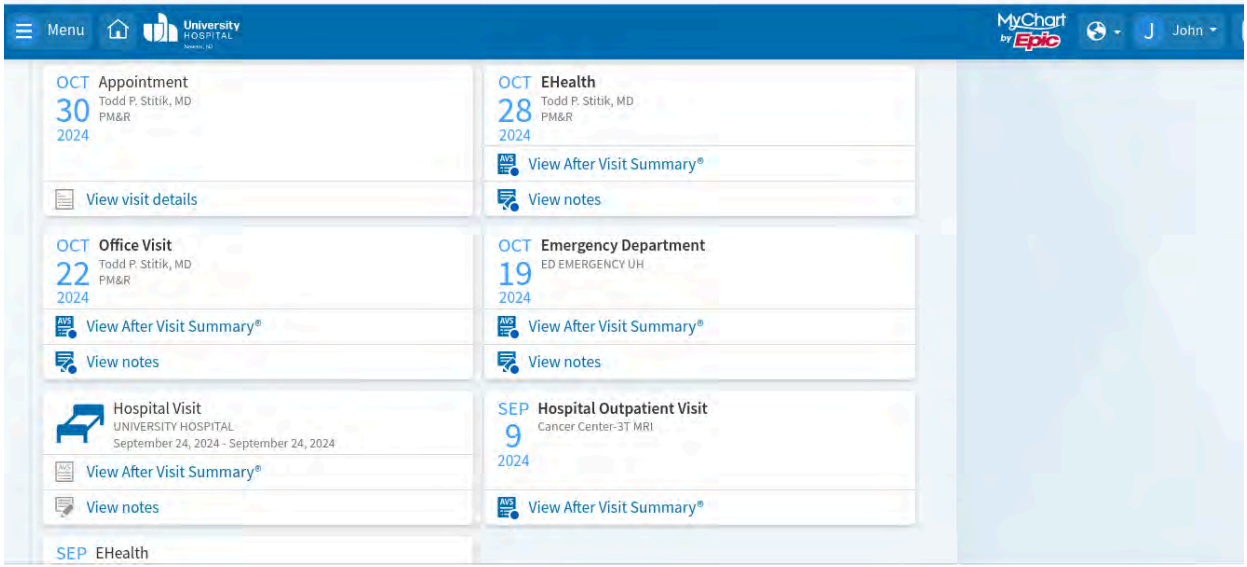
truth she will not leave me alone but isnt woman enough to own up to these crimes against me.

These motions filed on Thursday require litigation and proposed counsel called to enroll based on pricing for a scope of work, her additional untimely motions changed the fee, and scope of work and time. Therefore when counsel called to enroll on Thursday the additional motions which were not served upon me I had no copies to provide the context so counsel couldn't enroll blindly considering the seriousness and gravity of this case and the likelihood of appeal he didn't want to make mistakes such as the ones made by Ms Dominic, I couldn't have predicted a seizure and tearing my spinal cord so how are her filings untimely my fault? Judge Richard personal preference prevents my appearance via zoom and with my speech and spine affected all of this requires consideration. Please call me with any questions.

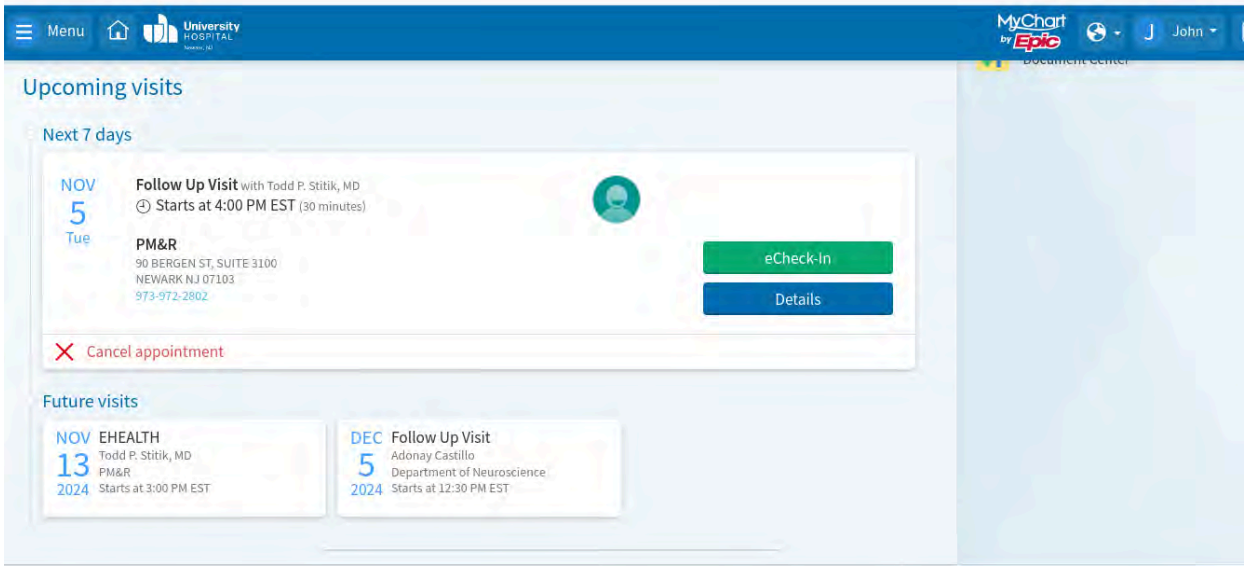
Please forgive me Im not an attorney and Im pro se and as Ms Dominic has displayed multiple times even attorneys get confused about the laws so I dont know whats needed to overrule her untruth in her motions filed untimely.
Thank You
John King

Case #23-2124 King VsAmos
11/04/2024
Confidential Medical Record from
Cancer center, Ambulance, Emergency Room, Hospital Admittance
Discharged on rolling walker to Muscular Skeletal and Neuro for seizures

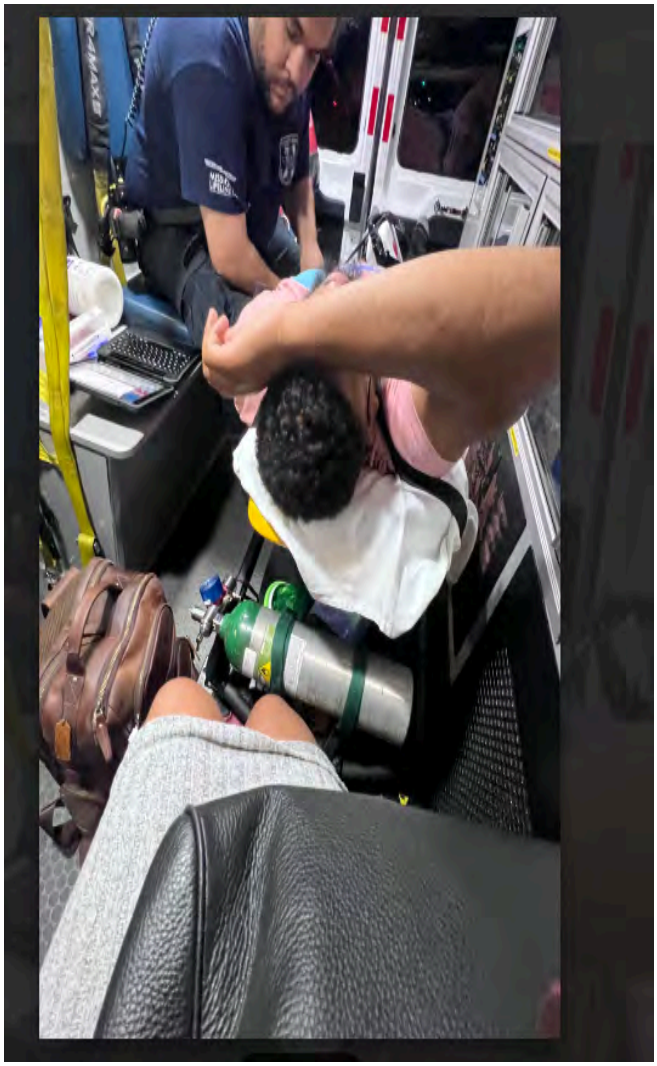
King Medical Records
September 9. 2024 - Cancer center outpatient
Oct 19, 2024 - taken to hospital by ambulance seizures - admitted temporary paralysis spinal tear
Oct 24, 2024 discharged to Muscular Skeletal and Neurology
Oct 28, 2024 - Muscular Skeletal
Oct 30, 2024 - Muscular Skeletal

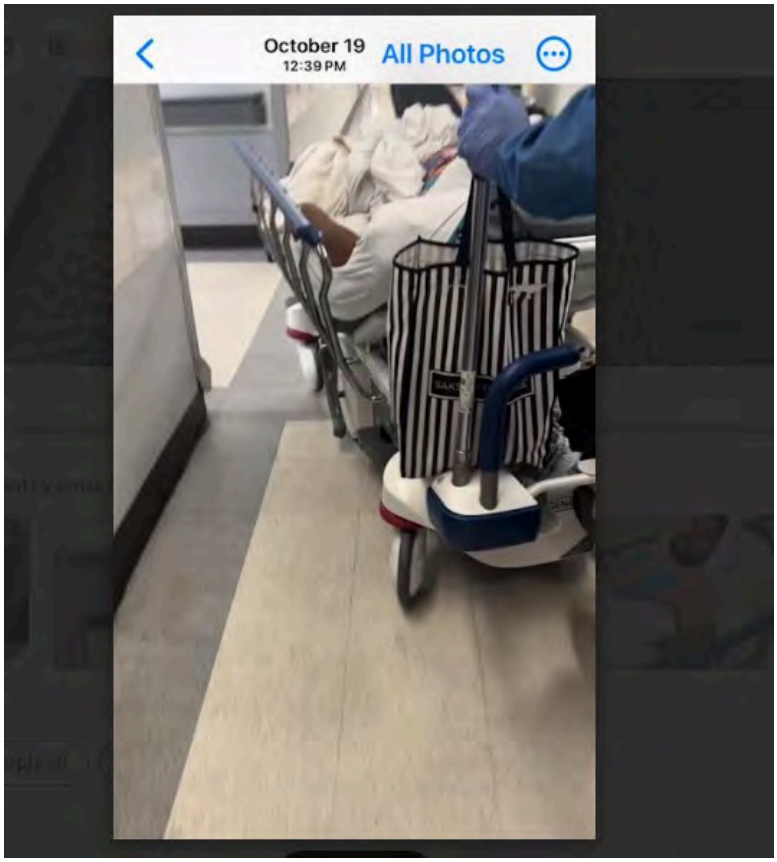


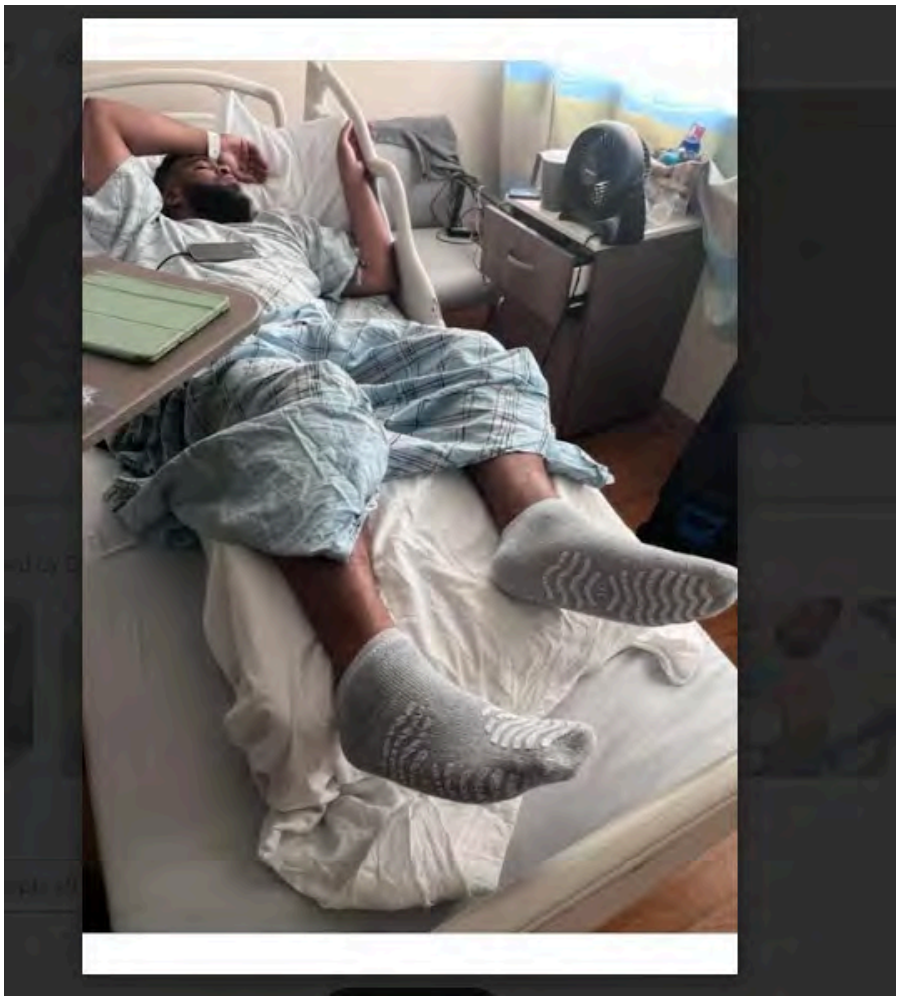
King Upcoming Nuerology and Muscular Skeletal
November 5, 2024 - Muscular Skeletal - review spinal cord swelling
November 13, 2023 - outpatient epidural to stabilize spinal tear
December 5, 2024 - Results of from neurosurgeon from outpatient treatment at cancer center and physical therapy


Menu
University HOSPITAL
MyChart by Epic
John
Upcoming visits
Next 7 days
NOV
5
Tue
Follow Up Visit with Todd P. Stitik, MD
Starts at 4:00 PM EST (30 minutes)
PM&R
90 BERGEN ST, SUITE 3100
NEWARK NJ 07103
973-972-2802
eCheck-In
Details
Cancel appointment
Future visits
NOV
13
2024
EHEALTH
Todd P. Stitik, MD
PM&R
Starts at 3:00 PM EST
DEC
5
2024
Follow Up Visit
Adonay Castillo
Department of Neuroscience
Starts at 12:30 PM EST

Photos

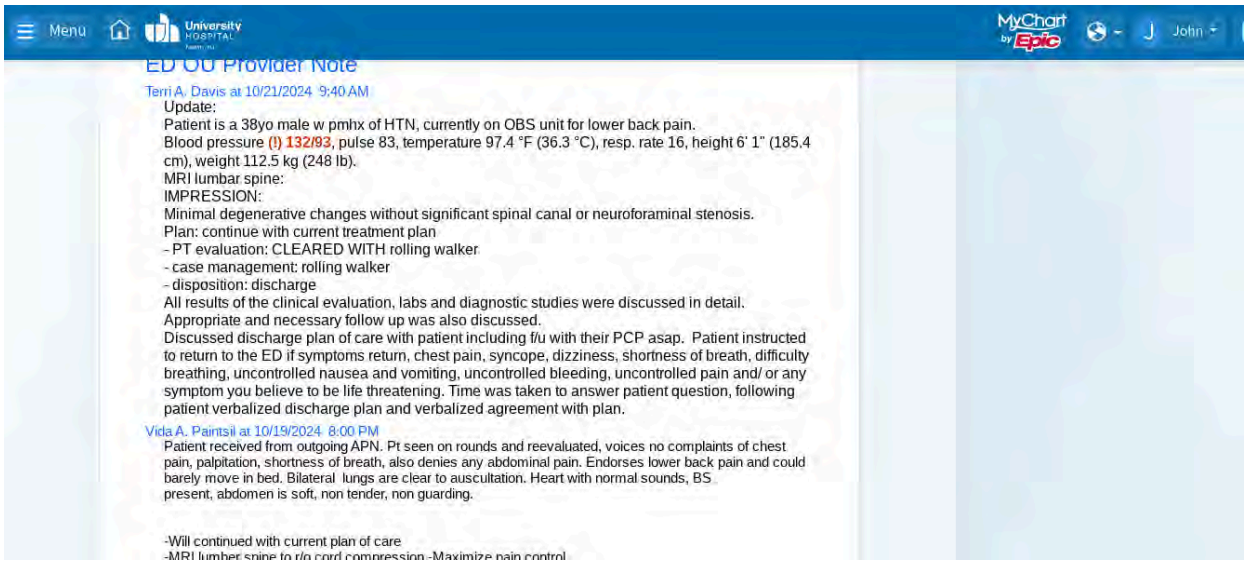



October 19
12:39 PM
All Photos





Discharged on Rolling Walker, Compressed Spine History of Seizures



Menu University Hospital MyChart by Epic John

ED OU Provider Note

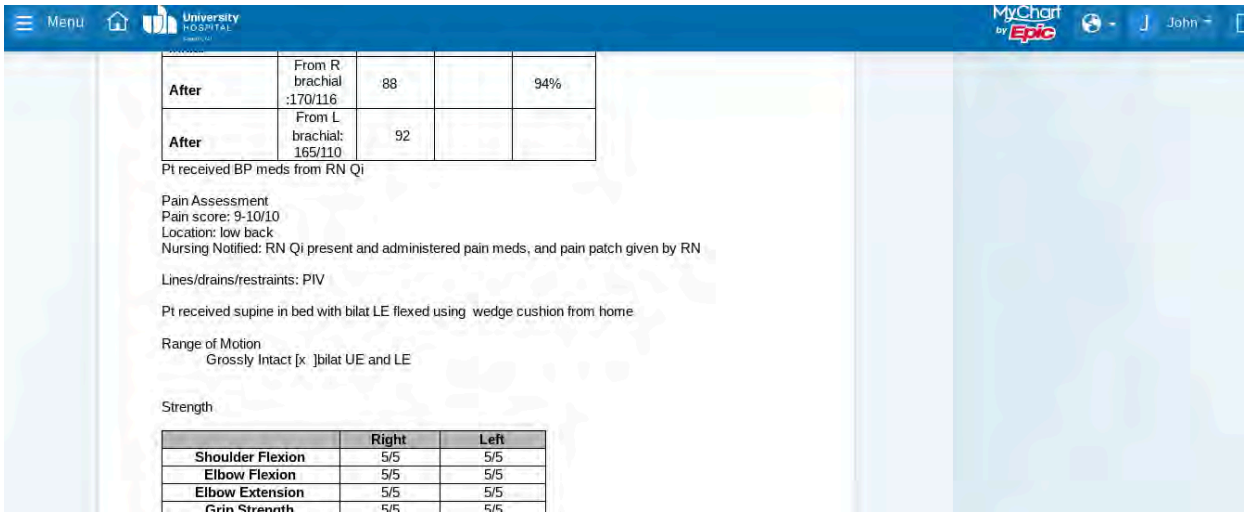
Terri A. Davis at 10/21/2024 9:40 AM

Update:
Patient is a 38yo male w pmhx of HTN, currently on OBS unit for lower back pain.
Blood pressure (!) 132/93, pulse 83, temperature 97.4 °F (36.3 °C), resp. rate 16, height 6' 1" (185.4 cm), weight 112.5 kg (248 lb).
MRI lumbar spine:
IMPRESSION:
Minimal degenerative changes without significant spinal canal or neuroforaminal stenosis.
Plan: continue with current treatment plan
- PT evaluation: CLEARED WITH rolling walker
- case management: rolling walker
- disposition: discharge
All results of the clinical evaluation, labs and diagnostic studies were discussed in detail.
Appropriate and necessary follow up was also discussed.
Discussed discharge plan of care with patient including f/u with their PCP asap. Patient instructed to return to the ED if symptoms return, chest pain, syncope, dizziness, shortness of breath, difficulty breathing, uncontrolled nausea and vomiting, uncontrolled bleeding, uncontrolled pain and/ or any symptom you believe to be life threatening. Time was taken to answer patient question, following patient verbalized discharge plan and verbalized agreement with plan.

Vida A. Paintsil at 10/19/2024 8:00 PM

Patient received from outgoing APN. Pt seen on rounds and reevaluated, voices no complaints of chest pain, palpitation, shortness of breath, also denies any abdominal pain. Endorses lower back pain and could barely move in bed. Bilateral lungs are clear to auscultation. Heart with normal sounds, BS present, abdomen is soft, non tender, non guarding.

-Will continued with current plan of care
-MRI lumber spine to r/o cord compression -Maximize pain control



After	From R brachial :170/116	88		94%
After	From L brachial: 165/110	92		

Pt received BP meds from RN Qi

Pain Assessment
Pain score: 9-10/10
Location: low back
Nursing Notified: RN Qi present and administered pain meds, and pain patch given by RN

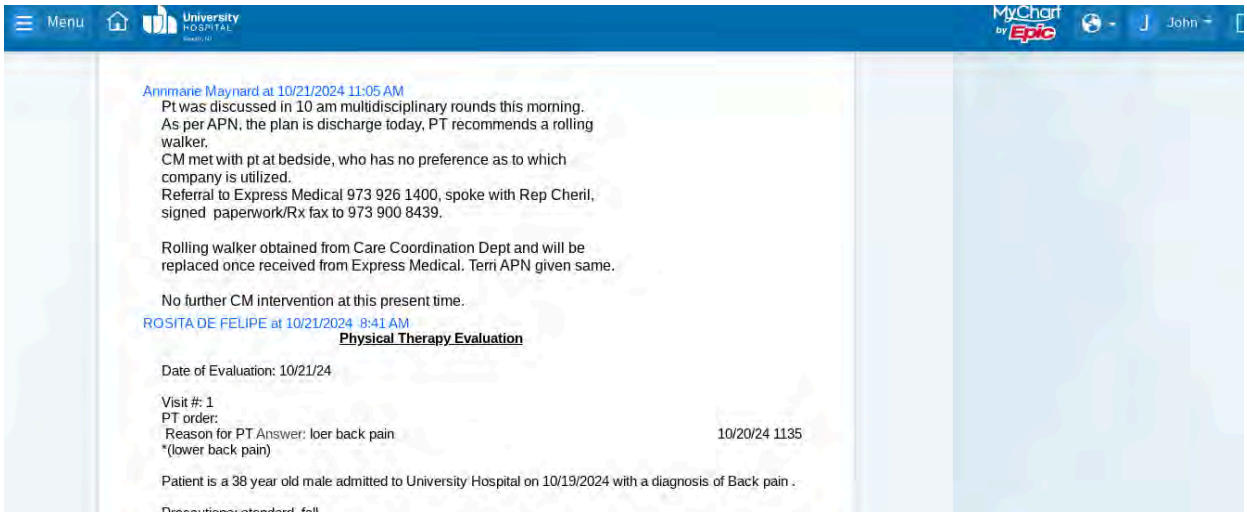
Lines/drains/restraints: PIV

Pt received supine in bed with bilat LE flexed using wedge cushion from home

Range of Motion
Grossly Intact [x]bilat UE and LE

Strength

	Right	Left
Shoulder Flexion	5/5	5/5
Elbow Flexion	5/5	5/5
Elbow Extension	5/5	5/5
Grip Strength	5/5	5/5



Annmarie Maynard at 10/21/2024 11:05 AM

Pt was discussed in 10 am multidisciplinary rounds this morning.
As per APN, the plan is discharge today, PT recommends a rolling walker.
CM met with pt at bedside, who has no preference as to which company is utilized.
Referral to Express Medical 973 926 1400, spoke with Rep Cheril, signed paperwork/Rx fax to 973 900 8439.

Rolling walker obtained from Care Coordination Dept and will be replaced once received from Express Medical. Terri APN given same.

No further CM intervention at this present time.

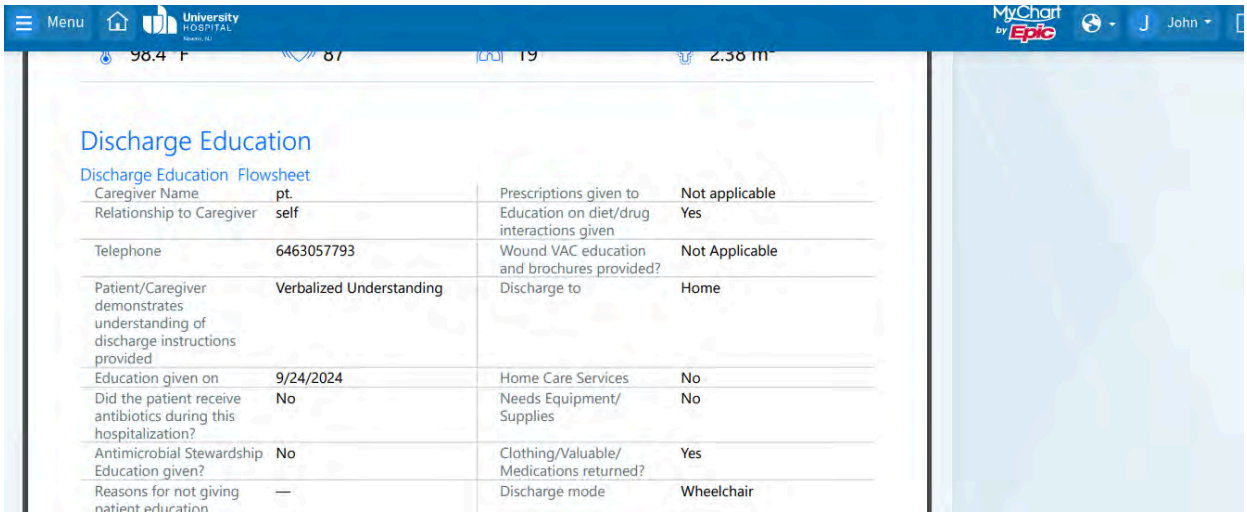
ROSITA DE FELIPE at 10/21/2024 8:41 AM

Physical Therapy Evaluation

Date of Evaluation: 10/21/24

Visit #: 1
PT order:
Reason for PT Answer: loer back pain 10/20/24 1135
*(lower back pain)

Patient is a 38 year old male admitted to University Hospital on 10/19/2024 with a diagnosis of Back pain .



98.4 °F 87 19 2.38 m²

Discharge Education

Discharge Education Flowsheet

Caregiver Name	pt.	Prescriptions given to	Not applicable
Relationship to Caregiver	self	Education on diet/drug interactions given	Yes
Telephone	6463057793	Wound VAC education and brochures provided?	Not Applicable
Patient/Caregiver demonstrates understanding of discharge instructions provided	Verbalized Understanding	Discharge to	Home
Education given on	9/24/2024	Home Care Services	No
Did the patient receive antibiotics during this hospitalization?	No	Needs Equipment/ Supplies	No
Antimicrobial Stewardship Education given?	No	Clothing/Valuable/ Medications returned?	Yes
Reasons for not giving patient education	—	Discharge mode	Wheelchair

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601
  kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant’s Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis

I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant's **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), "excited utterance"**, and **La. C.E. Art. 803(3), "then-existing mental, emotional, or physical condition"**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses' statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant's claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Case # 23-2124
King Vs Amos The Hartford

Motions Continuance DismissQuash
10/31/2024

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the 31st day of October, 2024, at 6:58 o'clock AM/PM, Lake Charles, Louisiana.

5/31/24

signature

STATE OF LOUISIANA

Case # 23-2124 Motions Continuance DismissQuash
King Vs Amos The Hartford 10/31/2024

PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared **John CJ King Sr.**, who, after being duly sworn, did depose and say:

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical



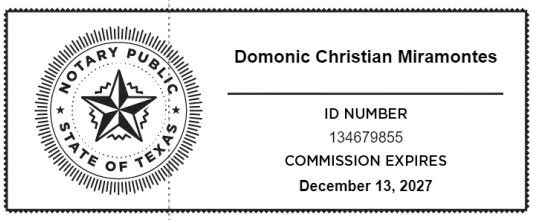
_____

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 10/31/2024

Number of Pages (including notarial certificate): 7



State of Texas

County of Bexar

This instrument was acknowledged before me by means of an interactive two-way audio and video communication on 10/31/2024 by John Clifford King.

June 3, 2024 *johncjking86@gmail.com*
LASES# 380702-01
John C King

Urgent Attention: Charde Carter
CC: Randall Sterrett Attorney DCFS Lake Charles,LA
DCFS Child Support Enforcement
PO Box 94065
Baton, Rouge LA 70821
Reference Calcasieu Civil Case # 2021-2773
King: Plaintiff
Colston: Defendant

LETTER OF WARNING: CRIMINAL ACTIVITY INVOLVED
Warning Disturbing Images Attached-*Memorialize this for the Record at DCFS*

Good Morning Ms Carter,

I am responding to a letter from Ms Charde Carter, (image below),as it is stated it is mandatory that I respond. It was dated May 22, 2022 and I had a surgical procedure that week. It is documented and recorded. Ms Carter I am ashamed that you and your office are being dragged into this increasingly contentious case that is becoming not only criminal in nature but violent as well and I must warn you and your supervisor so that your agency does not accidentally overstep into state and federal criminal and civil proceedings.

I am only responding because you contacted me and said it's mandatory and my legal counsel is on vacation and can't respond by your deadline.

I am tired and I want this to end but not with innocent people getting hurt like my children and family have been subjected to.

She has a mental illness and if after reading the notes and my ongoing medical record and employment history you cannot see that i don't know what else to do. Go pull my record. Why do I keep losing good jobs? Why are my coworkers the last 13+ years all saying the same thing in affidavit? Its a form of domestic violence and financial abuse and case workers such as yourself get roped in without knowing the destruction and violence and mood swings Charmaine Coslton is capable of. She is unstable and obsessed and its continuing to escalate with me as her intended victim.

I am also required to provide all correspondence that would interrupt my civil rights to indemnify me the rights to a company asset that has a lien against it by an FDIC accredited institution against the value of the automobile which takes precedent and since you do not know all of the

details involved in this complex legal minefield that Charmaine is dragging you into I caution you as Mr Sterret can attest the last person Renee Amos committed a federal crime she claims she was manipulated by Charmaine Colston with the poor single mother narrative only to now be on trial for felony involvement in stolen vehicle, fraud debt instrument, false power of attorney, false transfer of securities fraud all by agreeing to notarize documents while i was married and living out of state and I was not in the state with ID in hand nor did I provide signature. Ms Amos is now financially on the line for the mistake made.

She is now trying to loop Ms Carter and DCFS into the proceedings so that when State Farm and The Hartford seek recourse for federal laws being broken which state that Colston can by no means benefit from a crime she involved herself in with intent to defraud for financial gain. If a state government agency unknowingly involves themself then Charmaine will simply allow both insurance companies to sue the DCFS for recourse stating that you used the DCFS agency to circumvent federal law. If she burned my house down and an insurance company indemnify me for my losses and you send a letter to my lawyer stating that they must turn over the funds to Ms Colston and say that it is your authority as a government agency to aid in that criminal behavior i can assure you State Farm will seek recourse to recoup their losses. Child support does not involve indemnity, marital assets, or automobiles with liens against them which is the case in this matter. **A collateral loan was taken out against my stolen vehicle and the financial institution is demanding to be indemnified for their losses as I then lost my job. I will find it necessary in any proceedings with them to let them know that I did fight to get their funds back to them as liens and indemnity ARE NOT INCOME AND NOT SUBJECT TO CHILD SUPPORT JURISDICTION OR IT WOULD CAUSE CHILD SUPPORT TO ACT IN A CRIMINAL LAW ENFORCEMENT CAPACITY WHICH IT IS NOT EMPOWERED TO DO SO.** I will also welcome official proceedings to investigate the matter unfortunately if opening that investigation finds Colston responsible she may stand trial for multiple federal crimes and if found guilty prison time. She is so one track minded all she sees is trying to hurt me not what shes doing to her. and prison that has not been my intention as I know she is mentally ill , and its not healthy for my children and simply as you can see by images attached cannot move past a failed relationship which I tried to escape and I am still trying to escape. She will not go away. She is obsessed with every job, every court settlement, she won't accept the IRS payments that would clear my arrears. Ms Carter , Charmaine Colston has tunnel vision for revenge only and is recklessly destroying the lives of every individual or agency that is attached to our cases. She doesn't care if you lose your job proof is that she didn't tell you that the auto case goes to trial November 14, 2024 Lake Charles City Court Case # 23-2124 and Mr Sterret, your legal counsel for the state, would back me up in telling you she lured you into writing a letter which would hold your agency liable, and you and your job in danger. I highly recommend that you make Charmaine Colston communicate with you in writing with no visits to your office as she is putting it on facebook as if it is your fault or that I somehow am evading justice for 1. She gets me fired multiple times and promises to do it again. 2. She caused my fall

and injury by making up a lie stating my son was dying and in emergency surgery and I needed to rush to Lake Charles which was an attempt for her to sleep with me.

I am expressing that Charmaine Colstonno longer be allowed to use the DCFS office as her personal bullying service and that on the record something be done about this continued abuse of power which is contributing to extremely tense, unhealthy and sometimes violent interactions and confrontations with friends, family, shouting matches at the DCFS office threats to the charter school board. We will get to the bottom of exactly the extent these abuses have been allowed to highlight the exact number of phone calls, texts, emails, acts of contempt by blatantly refusing court orders. I will no longer all Charmaine to continue to violate harassment laws by using the DCFS as an extension and tool to continue her terrorizing and down right despicable behavior; which has affected ny employability, caused injury to my nervous system and resulted in several surgeries and intense medical evaluations from the never ending 24/7 torment of the last 15 years. Please pay attention, as for as long as I was a victim to this woman's deranged advances for years there were no child support issues but ever since then you see repeated terminations and constant outside phone calls to employers who have affidavits, provided evidence of her phone calls which has at times tied up dispatch lines for an entire day costing them hundreds of thousands in production as no 18 wheelers could move or communicate while dispatch was tied up. I am sick of this and have contacted the authorities to conduct a full thorough investigation into how many times shes contacted family, friends, employers, law enforcement, judges, written my attorneys ex parte, and openly and definitely stated she won't obey Judge Mitchell Redd or Mr. She provokes and seeks violence by coercive control and refuses to leave my family alone and all members who she contacts via text phone and email are participating in this investigation and will be seeking permanent protective orders for themselves, their families and employers.

Ms Carter and Mr Sterret, I am writing to you on behalf of the best interest of my children minors Jayla King, John King Jr, and Jakai King. Over the case of this trial and support proceedings all of us including the DCFS headquarters have been subjected to an excessive amount of daily abuses by Charmaine Colston including but not limited to phone calls, emails, pop up visits, harassment, multiple case workers being put on the case. This does not even include the amount of continued stalking, slander, and calling employers which resulted in multiple terminations. I have signed affidavits from coworkers the last 13 years each highlighting violent incidents where Colston's behavior has and continues to affect my employment opportunities. My health and work history are plagued by excessive non stop texting phone calls, showing up on job sites, she has even contacted over 300 different coworkers at different extensions at the best employer I ever had in New York. Resulting in an investigation and my ban from Banker Steele projects. They have provided recordings of her numerous and excessive phone calls saying I don't take care of my kids, saying I beat her, saying I needed to lose my job to the point where law enforcement has had to become involved on multiple occasions. Colston during this investigation has and continues to engage in cyberstalking crimes where she has hacked the

google emails , text, illegal gps tracking, hacking multiple apps to forward myself and family members texts to her phone. She then pretends as though she “obtained” these texts from family. I am writing to warn this will not be tolerated anymore and I have taken appropriate action with the appropriate agencies to free myself from this psychological bondage of this clearly mentally disturbed fatally attracted individual. I ask only that she not use your offices as a tool as an extension of her abuse and harassment. The threats she makes to Ms Carter and multiple falling outs at the DCFS office is sickening. It's disgusting what you all have to endure and even more disgusting that her actions have caused to me financially, mentally and emotionally there are existing court orders that prevent her from slandering me and my family but as you can see form below she not only slanders me but is telling the public it is your offices that are responsible.

It is the duty of DCFS to act non biased, legally in accordance with the law so that if and when this investigation proceeds DCFS is not found to have aided this monster and any violent consequences that result from her threats and erratic behavior. I have worked and been respectful to my caseworkers at DCFS. It is Colston who bombards your office daily with emotionally uncontrolled tantrums. If this is what she's doing in broad daylight, imagine what I'm experiencing behind closed doors that are disrupting my medical care, licensing, and treatment. She has refused child support payments in the past on multiple occasions to the point where I no longer trust or know which method is legally binding at the moment. The state law says she is entitled to all $21,000.00 of my unpaid tax returns this would clear all arrears but Colston doesn't want the money she wants my drivers license suspended, she wants my credentials revoked she is bitter and scorned for no reason over a failed relationship from five years ago that she herself in writing ended and said she was involved sexually with other men and women and since then has withheld my children, stalked, stolen vehicles, committed SEC and insurance fraud, continues act in a way that is increasing felony level harassment charges as she is now putting my wifes face and name on her facebook page. Along with slander and harassment of my family, parents and grandparents. What does any of this have to do with my children? (please read below)

In accordance with state law, both parents must legally comply and both employers must be contacted. I am requesting that my civil rights by matter of procedure be upheld and that her employer at Homsi in Lake Charles Louisiana be sent a letter just as you willingly send letters to whomever she demands without proof that the income of Charmaine Y Colston be provided to the DCFS office. Address: Homsi's Tobacco and Beer 2612 Kirkman Street, B, Lake Charles LA 70601 as you can see from the facebook posts she is admitting to working there committing perjury as Mr Sterret witnessed her on the stand under oath say she doesnt work there and hasn't been employed there. The children are entitled to equal share of both parents' incomes and I am entitled to fair calculations.

Additionally Charmaine Colston has participated in criminal activity one of which is the stealing of my automobile and this case is ongoing. As you know Charmaine Colston is legally prohibited from benefiting financially from any crime she willingly participated in for the sole purpose of financial gain and indemnity is NOT a source of income. (Ex state farm replacing a stolen or damaged work car or piece of equipment) if it is found she committed a crime with the strategy to increase her revenue and did in create capital gains she will be prosecuted by the insurance company from which she benefitted from which will result in felony criminal charges as both State Farm and The Hartford are entitled to recourse. Once DCFS is made aware that she stands to gain from criminal activity there is protocol and procedure to take action so that the state agency does not unintentionally interfere in either criminal, or federal laws which would then pull Ms Charde Carter and the Lake Charles office into the trials initiated by the insurance groups. This would allow the state to be named defendant if they ordered a crime to be committed by omission. I assure you that the insurance company will without a doubt be investigating if Colston stands to benefit by manipulating a government agency to aid in her crimes while knowing full well the proceedings are open and ongoing as her own attorney attended the proceedings on April 21, 2024 and will also be called as a witness.

I have supplied links to the case numbers attached for your office to review and consult with legal counsel. Colston nor DCFS have justification to violate my civil rights and action to indemnify me so that I may obtain transportation to feed my children. A driver's license and transportation are required to feed my children. I do not wish to have Ms Carter, the Lake Charles DCFS office, Mr Sterret or others subject to federal investigations as you know for example arsonists cannot benefit from the structure they burned down for the insurance money. Similarly the insurance company will seek damages from Colston as she cannot benefit financially from a car she stole and to my knowledge there are cases in existence where the Louisiana Supreme Court has ruled on this.

I am tired of Colston and exhausted from her 15 years of unending stalking manipulation and refusal to make my children's needs a priority. I desire to provide unlimited financial means for my children, I always have. If I were a different gender the abuse would be bold and non deniable but since this is not the case I've had to go to a federal level to seek protection for myself, my family, my children and yes protections for the DCFS office and their employees as we were all sick of hearing from her. If this were about money she would open the letters from the IRS sent to her at her Country Club Road address and release the $21,00.00 held in tax returns. All it takes is me carrying one child, she carries the other two and nearly $21k -$24 K will fall into the DCFS account and we will all be free of her. But no she doesn't want the money, she says she earns over $50k per year and is above the system and no one can stop her not the Judge Redd, not DCFS, not Mr Sterrett she doesnt want money so please exercise discretion why is she terrorizing me if Im fighting for my children and fighting to get transportation to provide for them.

Please refer to the following criminal case numbers
Calcasieu Parish - Case criminal case # 2021-00123665
Lake Charles City Court - Case # 23-2124
(Charge;Statute 14: 67.26. C(2)- * Theft of a motor vehicle between five thousand and twenty five thousand dollars)
Charge (Statute 14:72.A) Forgery

It is important that Ms Carter refer this case to the legal department and seek protections for herself by redacting any letters she sent out that would imply the agency's reach would supersede any court rulings and criminal investigations. My intention is not to have anyone else harmed unknowingly like Colston did to Renee Amos. She convinced Renee Amos to commit a crime and as a result Renee Amos is on trial for Colston's actions and deceit. Ms Carter this isn't a case about a "poor single mother" this is a criminal. I have suffered loss of employment and financial losses as a result of this crime and I do not want decent people's jobs to be hurt.

Coming after my drivers license and my right to have work transportation is not about money it's an attempt to keep me handicapped from being unable to earn income. She knows I had to declare bankruptcy and when she got me fired my car was repossessed. THIS ALL IS INTENTIONAL LOOK AT THE FACEBOOK BRAGGING! SHE WILL INTENTIONALLY MAKE ALL OF YOU LOSE YOUR JOBS PLEASE HEED THE WARNING OF THIS LETTER AND MAKE YOUR SUPERIORS AWARE SO THAT THEY MAY ESCALATE IT. Because the insurance companies lawyers will have to investigate the beneficiary of these dealings and if it is found that Coslton was involved it will open a can of worms unnecessarily. I want only to heal from my surgeries, no longer be susceptible to stroke from harassment, buy my work car and use it to provide for my children.

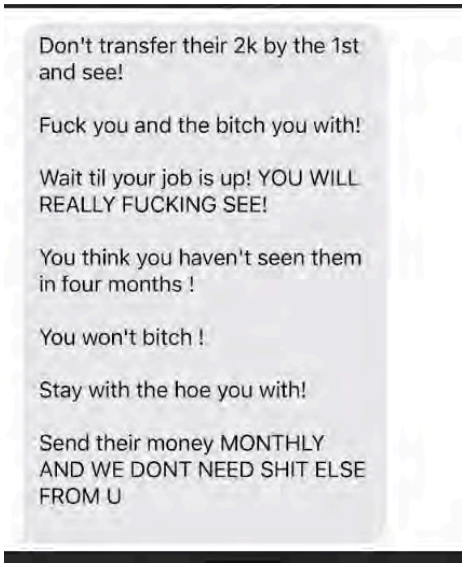
Examples Below and Thank You
John C King Sr.

1. Link Child Support Payments :https://docs.google.com/spreadsheets/d/1BuQcTOiXrdlEquP4TqxJqgwFLiDjqczbRxGqas0d26Q/edit?usp=sharing
2. May 25 2024 Stipulated Judgement https://drive.google.com/file/d/1ABusjfytIrVy0oB2Y9GRPieXZc5H69h3/view?usp=sharing

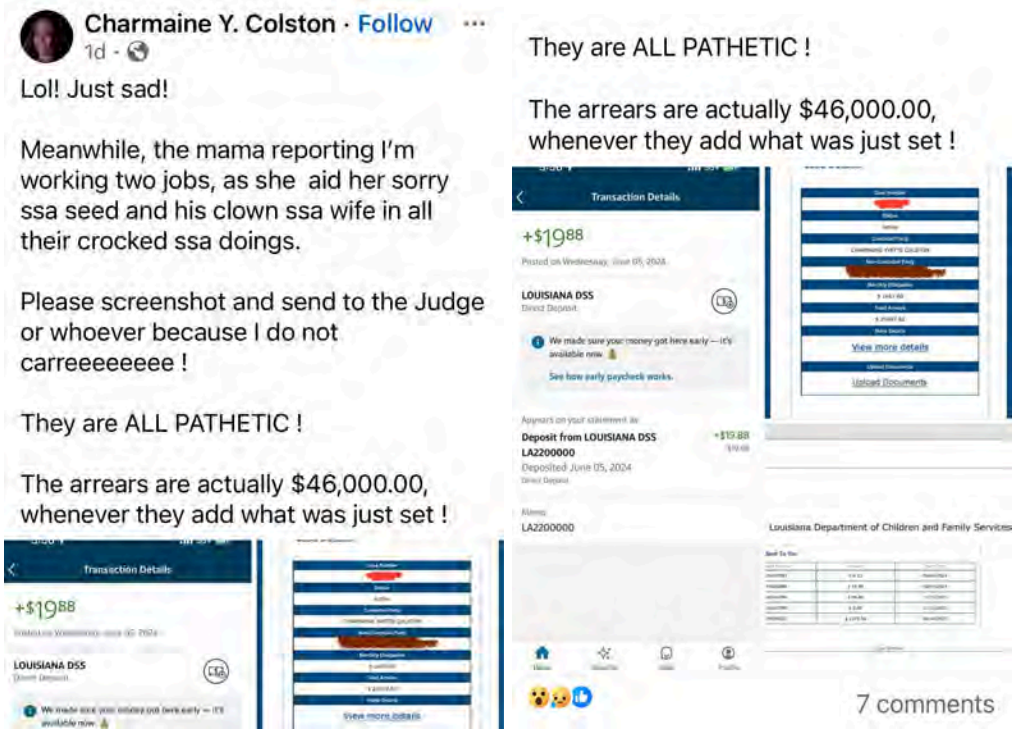
    - Provided OFW App correspondence where i've offered to pay her and she refused the payments.

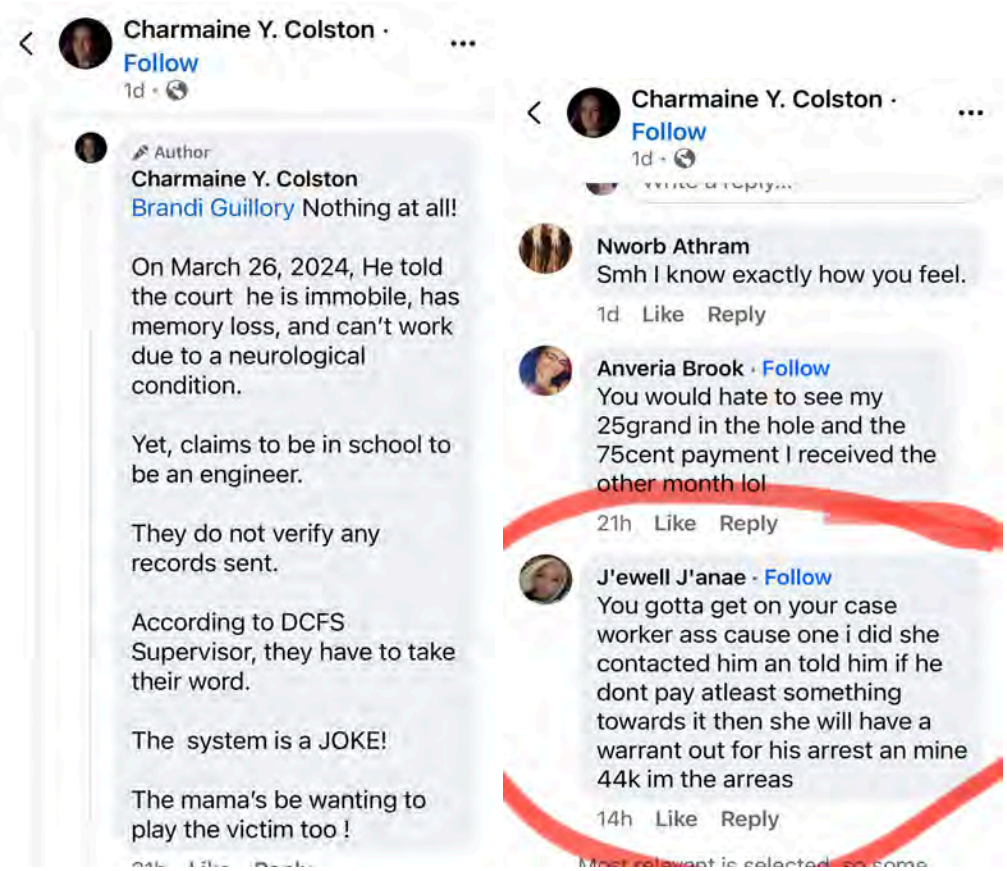
- Has stated in courts that the payments on the child support register are gifts
- Continues to lie about the current stipulated judgment she does not know nor will she be owed $46,000.00 when the judgment you read clearly says $24,000.00 total. Everything is a trick with her. I provided my income last year was $30K and the year before $15 k ive paid her almost $55k for 2021, 2022, and 2023 so what kinda math would entitle her to $46K more dollars? The hell is ongoing and never ending and she will not stop pursuing me and my family and harassing my wife calling her “itches” in writing to hundreds of ppl this is evidence she is attempting to use your agency instead of allowing the courts to exercise justice and should be banned from your office until investigations and all litigations are complete on all state and federal levels.

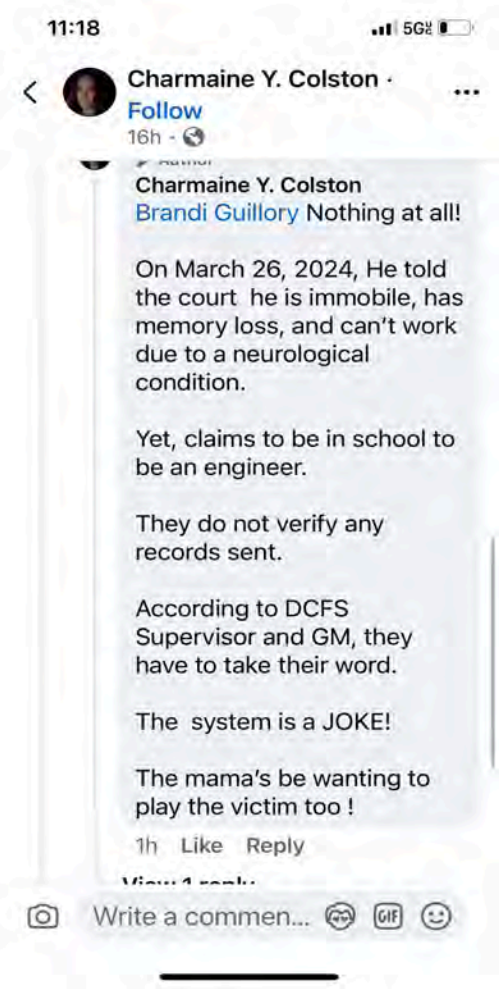
3. Text threatening to call my next job and get me fired again



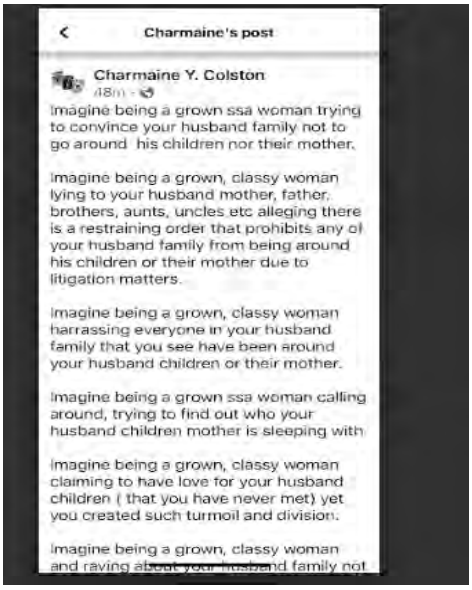
4. Facebook threats June 2, 2024 concerning DCFS OFFICE AND MS CARTER THE CASE WORKER AND CHILD SUPPORT

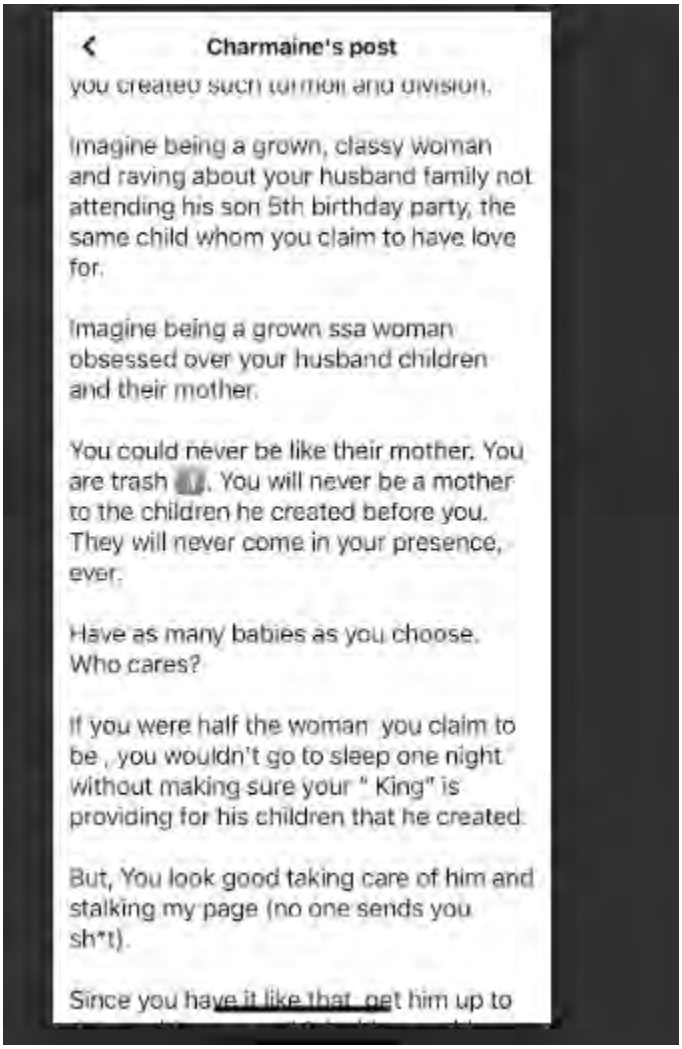

Charmaine Y. Colston · Follow
1d -
Lol! Just sad!
Meanwhile, the mama reporting I'm working two jobs, as she aid her sorry ssa seed and his clown ssa wife in all their crocked ssa doings.
Please screenshot and send to the Judge or whoever because I do not carreeeeeeee !
They are ALL PATHETIC !
The arrears are actually $46,000.00, whenever they add what was just set !
Transaction Details
+$1988
LOUISIANA DSS
Direct Deposit
We made sure your money got here early — it's available now.
See how early paycheck works.
Deposit from LOUISIANA DSS
LA2200000
Deposited June 05, 2024
+$19.88
LA2200000
View more details
Upload Documents
Louisiana Department of Children and Family Services
They are ALL PATHETIC !
The arrears are actually $46,000.00, whenever they add what was just set !
7 comments

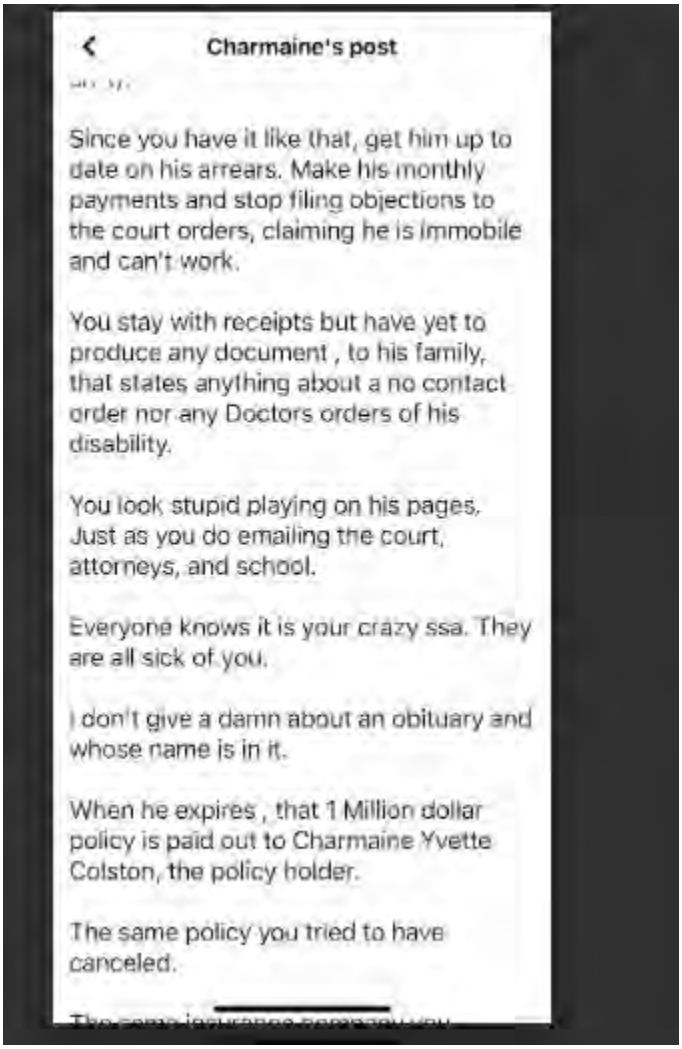

Charmaine Y. Colston ·
Follow
1d ·
Author
Charmaine Y. Colston
Brandi Guillory Nothing at all!
On March 26, 2024, He told the court he is immobile, has memory loss, and can't work due to a neurological condition.
Yet, claims to be in school to be an engineer.
They do not verify any records sent.
According to DCFS Supervisor, they have to take their word.
The system is a JOKE!
The mama's be wanting to play the victim too !
Charmaine Y. Colston ·
Follow
1d ·
Nworb Athram
Smh I know exactly how you feel.
1d Like Reply
Anveria Brook · Follow
You would hate to see my 25grand in the hole and the 75cent payment I received the other month lol
21h Like Reply
J'ewell J'anae · Follow
You gotta get on your case worker ass cause one i did she contacted him an told him if he dont pay atleast something towards it then she will have a warrant out for his arrest an mine 44k im the arreas
14h Like Reply

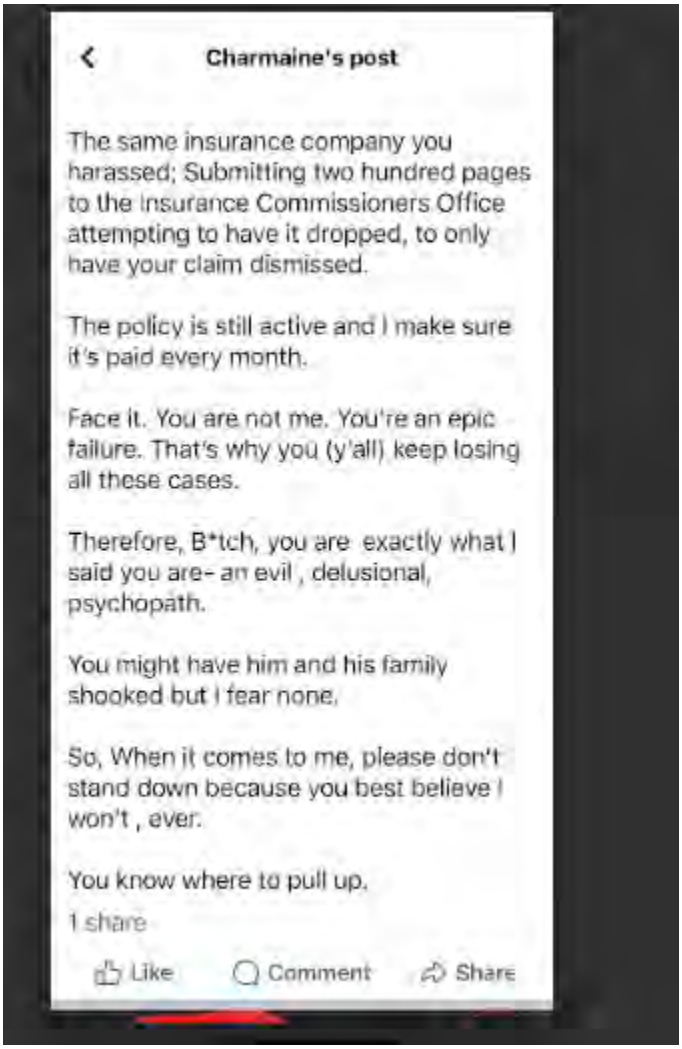


5. Facebook Threats/Slander of DCFS and Judge Redd Nov23-May24
    - Colston implies that the DCFS office is somehow communicating and siding with her abuse and harassment and no one has the power to stop her.


Charmaine's post
Charmaine Y. Colston
48m
Imagine being a grown ssa woman trying to convince your husband family not to go around his children nor their mother.
Imagine being a grown, classy woman lying to your husband mother, father, brothers, aunts, uncles etc alleging there is a restraining order that prohibits any of your husband family from being around his children or their mother due to litigation matters.
Imagine being a grown, classy woman harrassing everyone in your husband family that you see have been around your husband children or their mother.
Imagine being a grown ssa woman calling around, trying to find out who your husband children mother is sleeping with
Imagine being a grown, classy woman claiming to have love for your husband children (that you have never met) yet you created such turmoil and division.
Imagine being a grown, classy woman and raving about your husband family not


Charmaine's post
you created such turmoil and division.
Imagine being a grown, classy woman and raving about your husband family not attending his son 5th birthday party, the same child whom you claim to have love for.
Imagine being a grown ssa woman obsessed over your husband children and their mother.
You could never be like their mother. You are trash [redacted]. You will never be a mother to the children he created before you. They will never come in your presence, ever.
Have as many babies as you choose. Who cares?
If you were half the woman you claim to be , you wouldn't go to sleep one night without making sure your " King" is providing for his children that he created.
But, You look good taking care of him and stalking my page (no one sends you sh*t).
Since you have it like that, get him up to


Charmaine's post
Since you have it like that, get him up to date on his arrears. Make his monthly payments and stop filing objections to the court orders, claiming he is immobile and can't work.
You stay with receipts but have yet to produce any document , to his family, that states anything about a no contact order nor any Doctors orders of his disability.
You look stupid playing on his pages. Just as you do emailing the court, attorneys, and school.
Everyone knows it is your crazy ssa. They are all sick of you.
I don't give a damn about an obituary and whose name is in it.
When he expires , that 1 Million dollar policy is paid out to Charmaine Yvette Colston, the policy holder.
The same policy you tried to have canceled.


Charmaine's post
The same insurance company you harassed; Submitting two hundred pages to the Insurance Commissioners Office attempting to have it dropped, to only have your claim dismissed.
The policy is still active and I make sure it's paid every month.
Face it. You are not me. You're an epic failure. That's why you (y'all) keep losing all these cases.
Therefore, B*tch, you are exactly what I said you are- an evil , delusional, psychopath.
You might have him and his family shooked but I fear none.
So, When it comes to me, please don't stand down because you best believe I won't , ever.
You know where to pull up.
1 share
Like
Comment
Share



6. Facebook harassment continued….



Charmaine Y. Colston
13h ·

Diesha Radasha · Follow
Reels · Jan 15 ·

I remember asking my counselor " What if I leave and he gives the next girl everything I ever asked for?" And she said something that'll forever stick with me! "What if someone finds you and they give you everything without even asking?" And a year later all is well. Never settle❤️

❤️Add me on TikTok to see a smidget of my story _DieshaRadasha

❤️https://www.facebook.com/share/r/E8rLEdZcqKDWaVka/?mibextid=PkCAf5

Diesha Radasha Follow



Charmaine Y. Colston · Follow
34m ·

Good Morning !

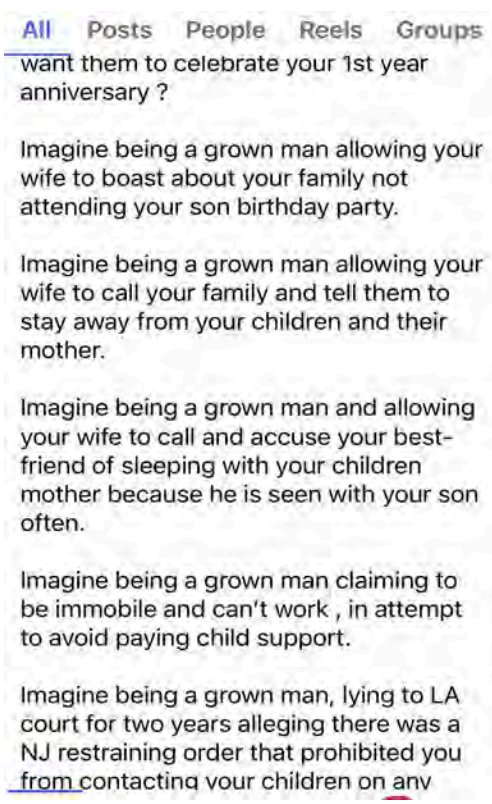
Thank you Father God for another day! Thank you for your protection, your grace, and your favor.

I ask in advance that you (God), The Judge, My Attorney, My Family , My Father N Law, My Children family , and MY FBF please forgive me for this lengthy post.

I try so hard to be meek and humble. Just as hard as I try to be still/ silent and better my ways/past.

I usually take the high road. I have done so for awhile now but the truth must be told.

I'll deal with the Judge next month; if the other party does not file a continuance and have it granted, again. 😊



All Posts People Reels Groups

want them to celebrate your 1st year anniversary ?

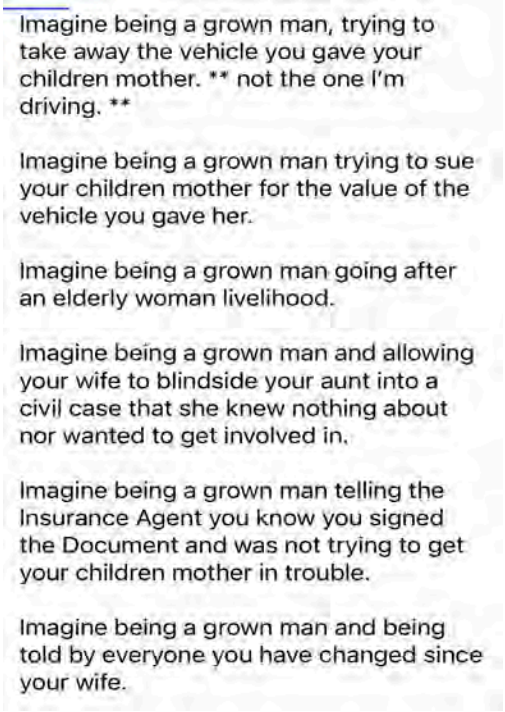
Imagine being a grown man allowing your wife to boast about your family not attending your son birthday party.

Imagine being a grown man allowing your wife to call your family and tell them to stay away from your children and their mother.

Imagine being a grown man and allowing your wife to call and accuse your best-friend of sleeping with your children mother because he is seen with your son often.

Imagine being a grown man claiming to be immobile and can't work , in attempt to avoid paying child support.

Imagine being a grown man, lying to LA court for two years alleging there was a NJ restraining order that prohibited you from contacting your children on any



Imagine being a grown man, trying to take away the vehicle you gave your children mother. ** not the one I'm driving. **

Imagine being a grown man trying to sue your children mother for the value of the vehicle you gave her.

Imagine being a grown man going after an elderly woman livelihood.

Imagine being a grown man and allowing your wife to blindside your aunt into a civil case that she knew nothing about nor wanted to get involved in.

Imagine being a grown man telling the Insurance Agent you know you signed the Document and was not trying to get your children mother in trouble.

Imagine being a grown man and being told by everyone you have changed since your wife.

Imagine being a grown man allowing your wife to act as you and email the court stating your children mother killed your children and she was admitted into a psychiatric institution.

Imagine being a grown woman , at your big age, creating multiple fake IG accounts to harass your husband children mother.

Imagine being a grown woman posting literally over 500 post regarding your husband , children mother.

Imagine being a grown woman stalking your husband children and their mother.

Imagine being a grown woman and inserting yourself in a matter that has never involved you.

Imagine being a grown woman pillow talking with a man about his children mother relationship history from sixteen

because your father in law loves his grandchildren mother and not you.

Imagine being grown woman portraying to have this so called relationship with your nlaws knowing they don't want anything to do with you.

Imagine being a grown woman and not telling your husband audience how many times your lunatic ssa have been told by your nlaws to stop contacting them.

Imagine being grown woman claiming to refuse to drag your father n law on facebook but disrespects him in private.

Imagine being a grown woman harrassing your mother n law and being the reason she totaled her vehicle.

More than a few things are clear here:

One being, Your husband is not a man and has not given up his childish ways.

Imagine being a grown woman pillow talking with a man about his children mother relationship history from sixteen years a go.

Imagine being a grown woman still stuck on what happened two years ago, after you harassed and provoked me.

Imagine being a grown woman thinking your idiotic plan was going to hold up in court.

Imagine being a grown woman who believes her own lies.

Imagine being a grown woman lying about being pregnant.

Imagine being a grown woman butt hurt because your father in law loves his grandchildren mother and not you.

Imagine being grown woman portraying to have this so called relationship with

are you happy thinking of me everyday? You email the court twelve page letters every damn day. You think your behavior is normal?

You are a fan, admit it. What is it about me that has you hooked?

If you wanted to be my friend, you should have said that. I don't hold grudges but I don't play with b*tches either. With that said, You have broken the camels back.

You don't want to be cordial. You like discord.

You are jealous of me for whatever reason. I don't want your man. That's why you have him.

You're welcome.

You want him and his family to despise me so bad.

You are really sick and it is very

Two, You are not a woman , you are evil, a narcissist, manipulative, unstable, spiteful, overbearing, envious, and controlling.

Three, you need to see a psychiatrist , immediately.

Four, you seek validation/love and appear to have a deeper issue embed.

Five, you choose to live in the past and keep confusion going.

In October of 2021, The Hearing Officer advised to move forward with a clean slate. That wasn't good enough for you.

Six, You are a joke and I am a force to be reckoned with.

Unlike you, I don't have to speak from a fake page nor someone elses page.

All Posts People Reels Groups

for them, who celebrates them. The invite was extended. They have me and plenty of family who loves, support and backs them, without your approval.

The only last name you should be concerned about is the one you write the childsupport check out to and that would be me, Colston. So that I may spend your money on my children. Since your husband can't keep a job.

Okay. I am done for real this time.

I put my faith in God and the system that everything will be taken care of him.

Justice will be served for me and my children.

God Bless,

Ms. Colston

1 comment

You are really sick and it is very concerning.

Your actions and hate for me is the very reason why you will never be around my children, ever in life.

Nothing will trump what I say.

Screen shot and send it to the court.

You need to stop stressing yourself trying to get a win, you won't.

Relax, you already lost all your edges.

I am convinced you both are on some sort of drug because who goes to this extent. How do you sleep?

In conclusion,

God blessed me with my children. I don't care who support them, who shows up for them, who celebrates them. The invite was extended. They have me and plenty

Charmaine Y. Colston

Posts About Videos More

Calling people to see if I am sleeping with them.

Lying to our nlaws telling them they can't be around me nor my children.

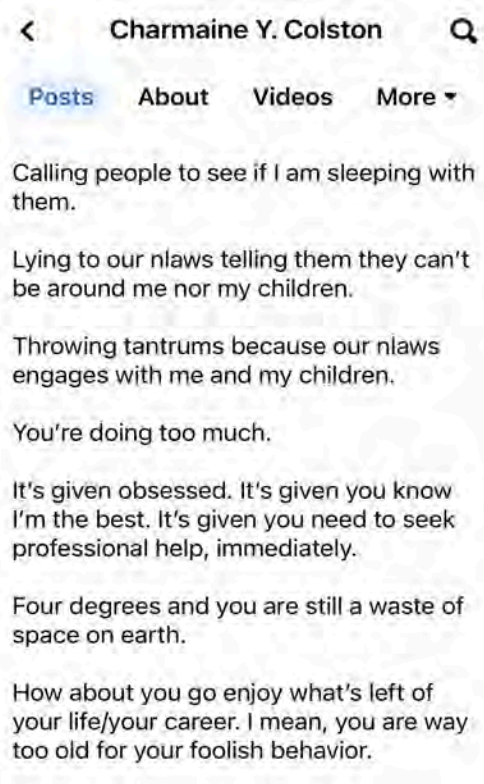
Throwing tantrums because our nlaws engages with me and my children.

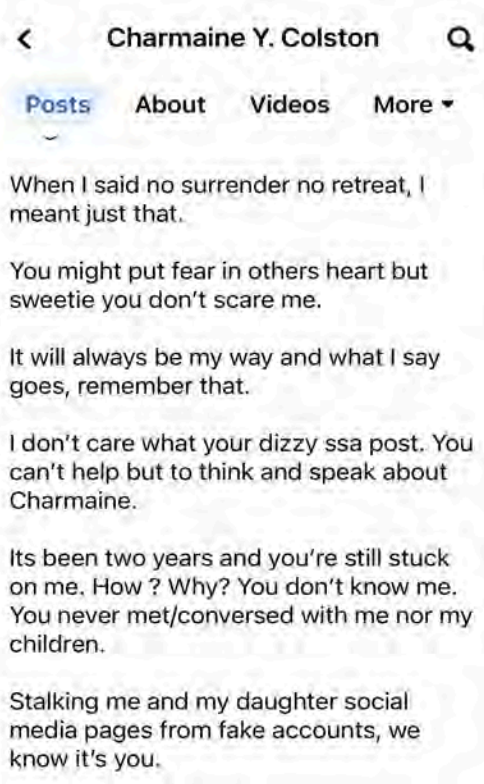
You're doing too much.

It's given obsessed. It's given you know I'm the best. It's given you need to seek professional help, immediately.

Four degrees and you are still a waste of space on earth.

How about you go enjoy what's left of your life/your career. I mean, you are way too old for your foolish behavior.


Charmaine Y. Colston
Posts
About
Videos
More
Calling people to see if I am sleeping with them.
Lying to our nlaws telling them they can't be around me nor my children.
Throwing tantrums because our nlaws engages with me and my children.
You're doing too much.
It's given obsessed. It's given you know I'm the best. It's given you need to seek professional help, immediately.
Four degrees and you are still a waste of space on earth.
How about you go enjoy what's left of your life/your career. I mean, you are way too old for your foolish behavior.


Charmaine Y. Colston
Posts
About
Videos
More
When I said no surrender no retreat, I meant just that.
You might put fear in others heart but sweetie you don't scare me.
It will always be my way and what I say goes, remember that.
I don't care what your dizzy ssa post. You can't help but to think and speak about Charmaine.
Its been two years and you're still stuck on me. How ? Why? You don't know me. You never met/conversed with me nor my children.
Stalking me and my daughter social media pages from fake accounts, we know it's you.


Charmaine Y. Colston
Posts
About
Videos
More
It's given obsessed. It's given you know I'm the best. It's given you need to seek professional help, immediately.
Four degrees and you are still a waste of space on earth.
How about you go enjoy what's left of your life/your career. I mean, you are way too old for your foolish behavior.
Nevertheless, I look forward to finally meeting you.
Like
Comment
Share
Charmaine Y. Colston
16h
What do you do when
Follow
Message

Mail weekly sent to my mothers house she goes to the post office and mails things to keep my mother and grandmother sick.
Charmaine does not recognize this behavior as insane or inappropriate seeing as though my wife has never met my children and has never even had a conversation with charmaine. This is years later after stealing the car and she does this and brags that there won't be justice for me or a punishment for her.

This is sick. This isn't a paramour this is a mentally disturbed individual and Ms Dominic should remain ethical when dealing with victims. I hadn't seen Charmaine colston in person in 13 months at time of car theft so how is that a paramour? I was married and living with my wife. It's more lies this is the harassment contributing to my seizures and paralysis and to discriminate against my gender is unethical and slander.



9:21 49%

← Replies

Replies to Tyria's comment on your post

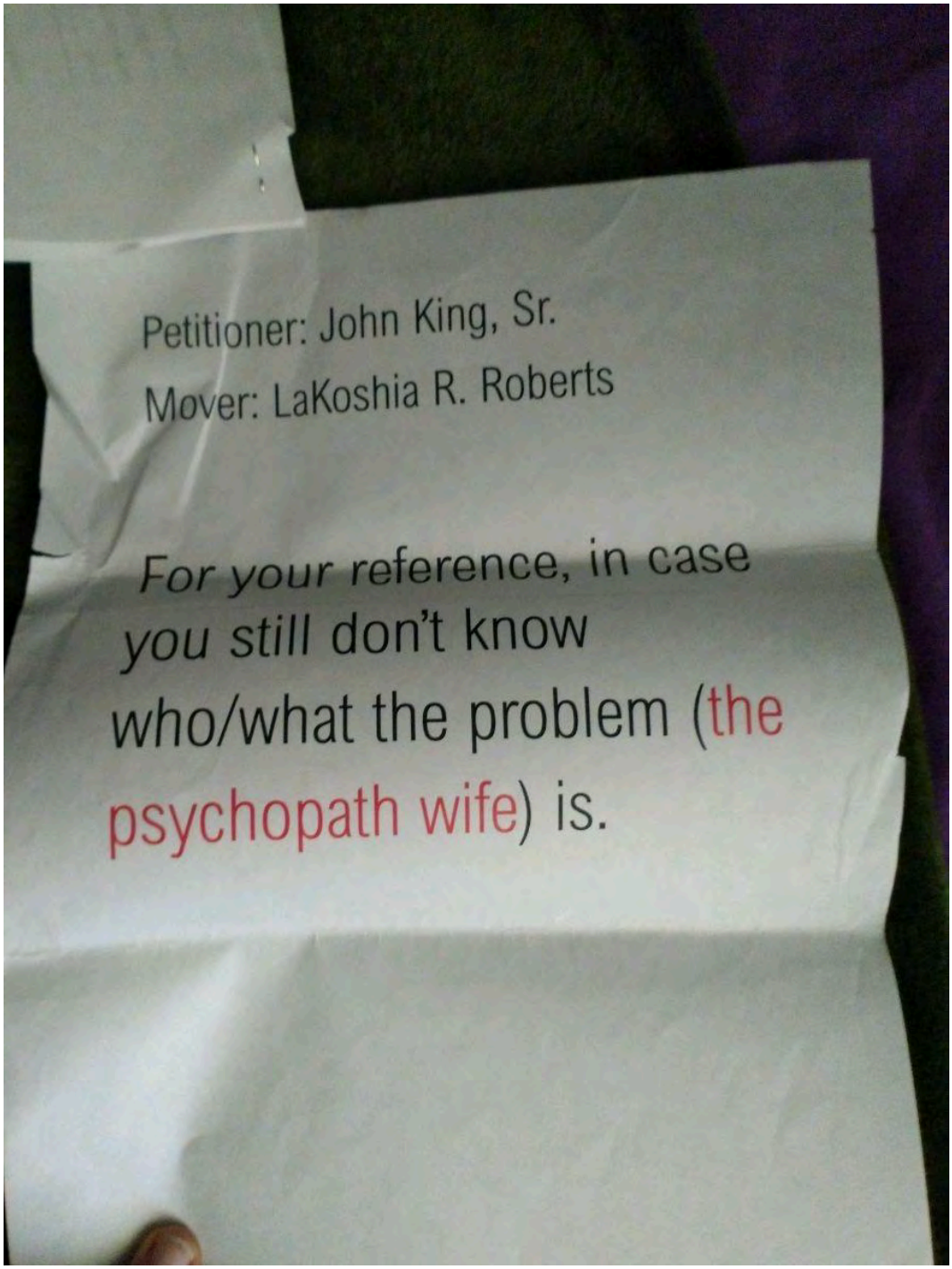
Tyria Guillory
I don't agree with him on make it work that is not good for a women or man that only wants control and not have a relationship for the kids. My nephew stayed with his kids mother regardless to the mental and physical abuse that he was hiding from his family. She cut him, burned him, she it him in the head with an object that left him with seizures. you have to do what is best for you, especially i... See more

7h Like Reply 1

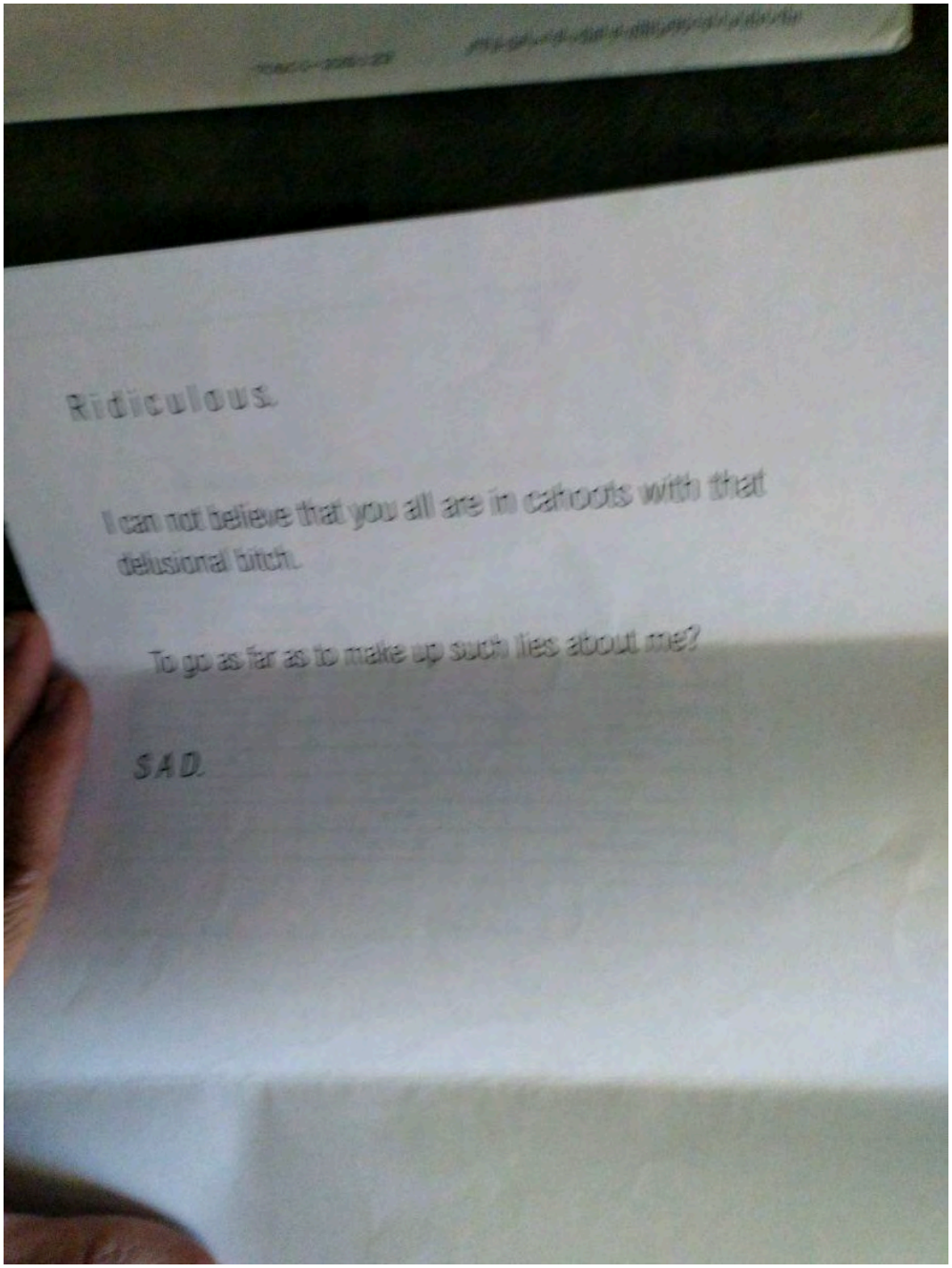
King Tay
Tyria Guillory I would settle for just keeping my photos, name, my likeness , my husbands god baby photos, shoot just don't post anyone that isn't posting you.

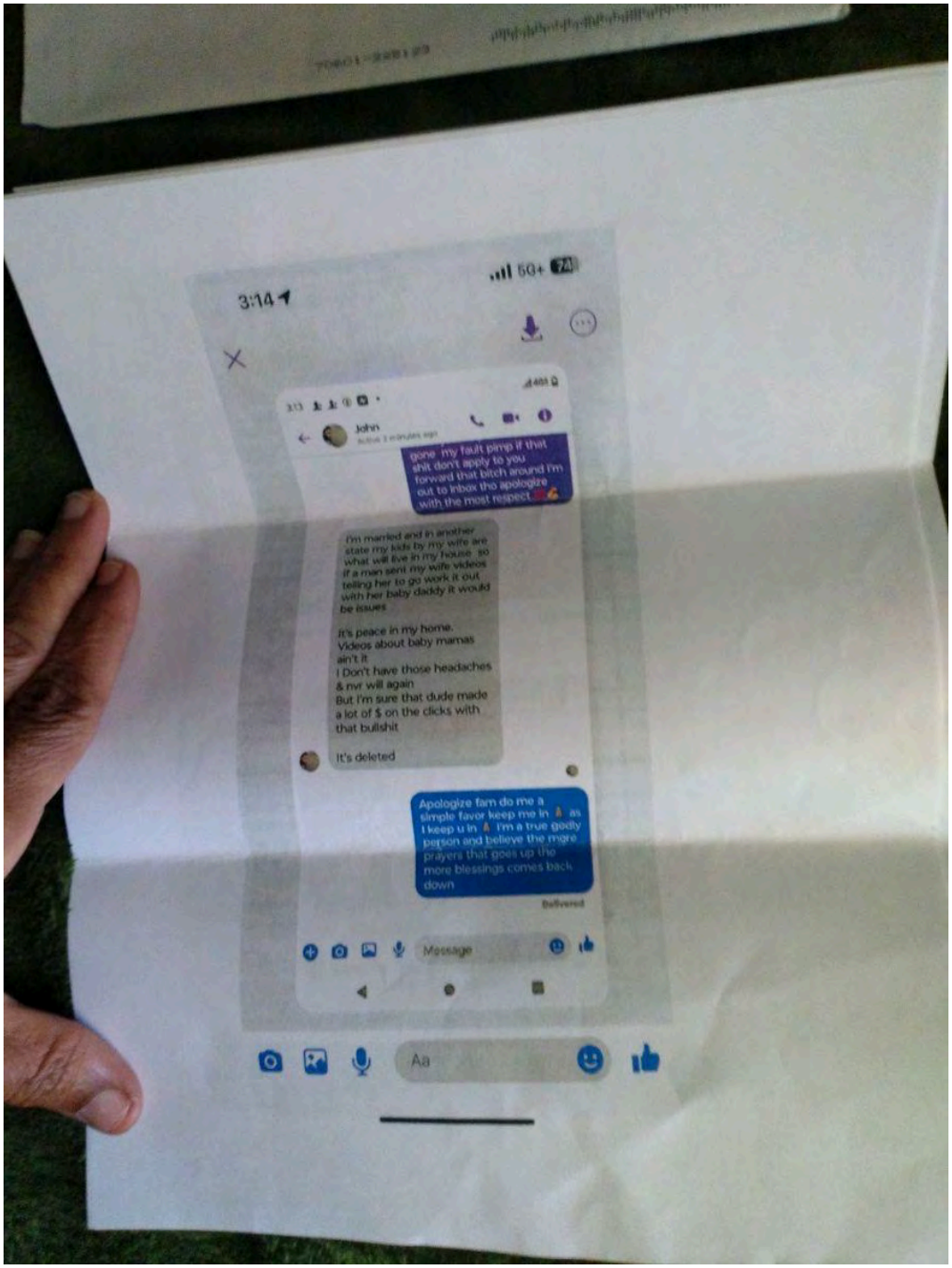
Or you will be subpoenaed to court if you deal with them and lose money off work...
-OR you will be accused of harassment. She gonna initiate every text, email, and mail stuff to your house "good morning ALL", as if you got a wedding ring t... See more

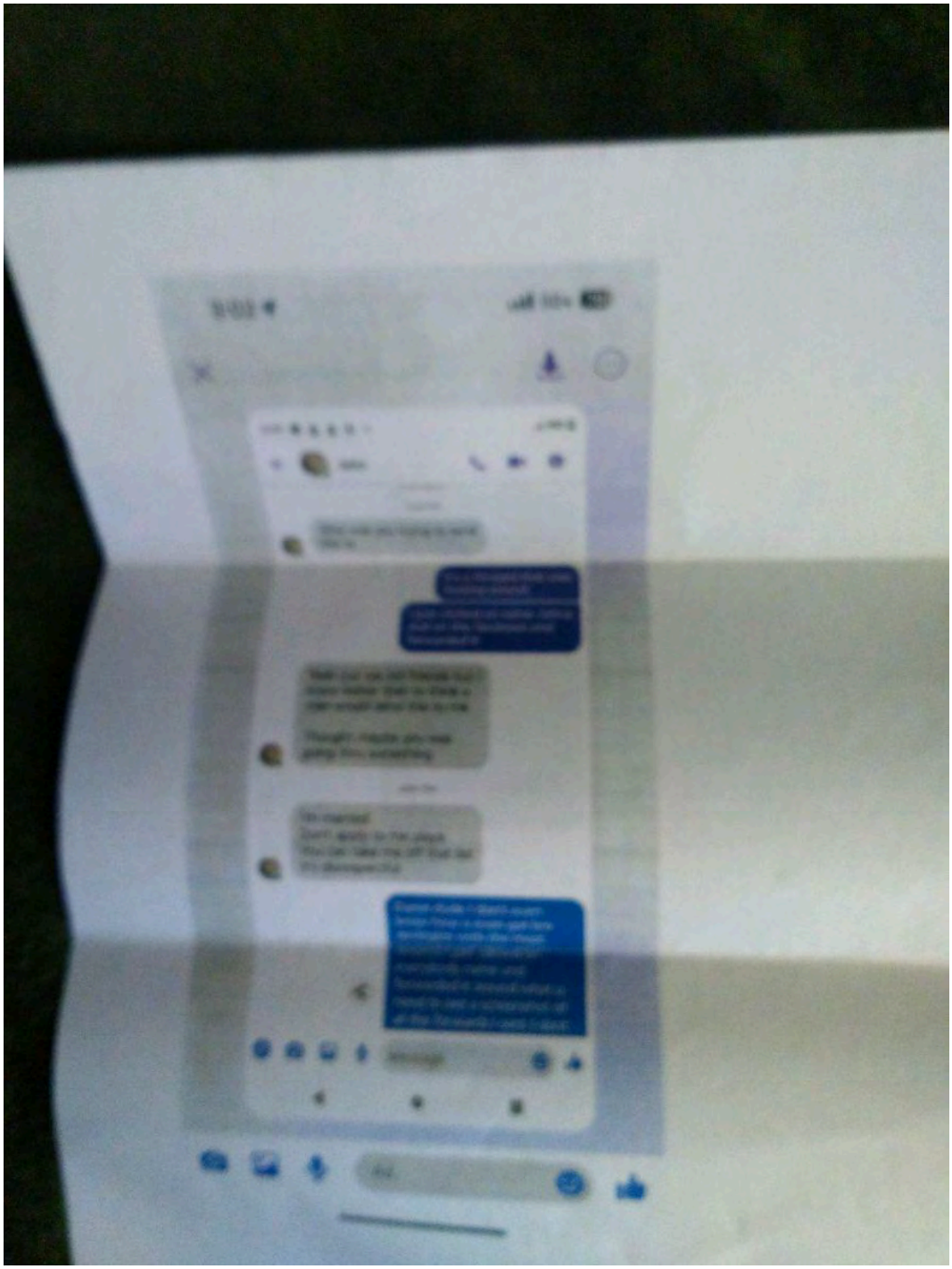
23m Like Reply


Petitioner: John King, Sr.
Mover: LaKoshia R. Roberts
For your reference, in case you still don't know who/what the problem (the psychopath wife) is.


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
821 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123


Ridiculous.
I can not believe that you all are in cahoots with that delusional bitch.
To go as far as to make up such lies about me?
SAD.


3:14
5G+
John
gone my fault pimp if that shit don't apply to you forward that bitch around I'm out to inbox tho apologize with the most respect
I'm married and in another state my kids by my wife are what will live in my house so if a man sent my wife videos telling her to go work it out with her baby daddy it would be issues
It's peace in my home. Videos about baby mamas ain't it
I Don't have those headaches & nvr will again
But I'm sure that dude made a lot of $ on the clicks with that bullshit
It's deleted
Apologize fam do me a simple favor keep me in 🙏 as I keep u in 🙏 I'm a true godly person and believe the more prayers that goes up the more blessings comes back down
Delivered
Message
Aa




King
921 Moss St.
Lake Charles, La 70601
BATON ROUGE LA 707
19 JUL 2024 PM 1 L
FREEDOM
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123


King
821 Moss St.
Lake Charles, LA 70601
BATON ROUGE LA 707
7 AUG 2024 PM 3 L
FREEDOM
Monica King Guillory
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123




BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
821 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123

5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.

Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail



January 29, 2026

NOTICE OF HEARING

JOHN KING, SR.
vs. 2021-2773
CHARMAINE COLSTON

State of Louisiana
14TH Judicial District Court
Clerk of Court: H. LYNN JONES, II

Attorneys:
ORELIA LAWDINS-TRENT
JOHN KING, SR., PRO SE

NOTICE sent VIA EMAIL ONLY to all counsel as per LA C.C.P. Art. 1313(C)

THE ABOVE CASE HAS BEEN ASSIGNED TO

AD HOC JUDGE H. WARD FONTENOT

VERIFIED MOTION TO RECUSE

HAS BEEN SET FOR:
FEBRUARY 10, 2026 @ 9:00 A.M.

ALL PARTIES ARE DIRECTED TO FOLLOW RULE 9.9 OR 9.10 OF THE UNIFORM DISTRICT COURT RULES CONCERNING FILINGS OR MEMORANDA AND AFFIDAVITS.

ALL PARTIES MUST SEND LETTERS, PRE-TRIAL MEMOS, AND OTHER COMMUNICATIONS ELECTRONICALLY TO
bistre@14jdc.org
FILE ORIGINAL IN RECORD

Direct all inquiries to:
Breanne Istre @ bistre@14jdc.org
Telephone Number (337) 721-3100, Ext. 6406

Re: LAKE CHARLES CITY COURT pauper affidavit

From: True King <truekingfile@gmail.com>

To: baleigh@abshirelawfirm.com

Cc: Dustan Abshire <dustan@abshirelawfirm.com>, Krissy Dupre <krissy@abshirelawfirm.com>

Date: Wed, 29 May 2024 12:54:16 -0400

Hello,
It was filed before Dustan was retained and refiled once they said they didn’t receive it.

What doesn’t he mean “not happy” they’re the ones that told us no one had enrolled as counsel for the March date with Kami which is why we had to fly out there?

Not “happy”? As in “joy”? The standards required by the law for pauper were met as he is a pauper for Calcasieu parish he has no income . Zero. And has had two surgeries in last two weeks.

None of our emails to you guys about the matter received responses you were sent everything and you said Dustan would answer the questions he was just super busy we received no response.

Monica Abshire told John he had to refile and that at the time they had no attorney of record. What is this game ? She told us last week to refile and he has and how would he even know as the judge who filed it ?

None of this makes any sense cause a paper trail was kept of emails and faxes and no one provided any feedback .

We have reviewed the standards for Pauper and he meets the standard.

Please advise if we have instructions in writing how “feelings “ are coming into play? Seeking to understand as none of the pauper emails have responses and there hasn’t been any phone calls about the matter
Thank you

On Wed, May 29, 2024 at 10:37 AM <baleigh@abshirelawfirm.com> wrote:

> Lake Charles City Court called our office and spoke with me.
>
>
>
> They advised that the Judge is *not happy* with John filing the pauper
> application on his own, and wanted to inform you that once you have
> retained counsel, *all pleadings are to go through your counsel*.
>
>
>
> They also stated that John is *NOT PAUPER*. They require the original and
> the $5 transmission fee.

>
>
>
> *From:* True King <truekingfile@gmail.com>
> *Sent:* Tuesday, May 28, 2024 11:44 AM
> *To:* baleigh@abshirelawfirm.com
> *Subject:* Re: LAKE CHARLES CITY COURT pauper affidavit
>
>
>
> Good morning
>
> Because they’re dysfunctional. If Kamie files something it’s signed within
> 24 hours .they pick and choose . She said she is Asking Judge Richard for
> the confirmation.
>
>
>
> Give me two hours please .
>
> Juggling a lot thank you dear
>
>
>
> On Tue, May 28, 2024 at 12:33 PM <baleigh@abshirelawfirm.com> wrote:
>
> See attached.
>
> Also, I called their office twice. They told me that John IS NOT pauper. I
> am not sure what the confusion is.
>
>
>
> *From:* True King <truekingfile@gmail.com>
> *Sent:* Tuesday, May 28, 2024 10:59 AM
> *To:* baleigh@abshirelawfirm.com
> *Subject:* Re: LAKE CHARLES CITY COURT pauper affidavit
>
>
>
> Just spoke with Monica Abshire. She confirmed it’s been received. For no
> reason at all it’s just sitting there . Judge Richard has it and for no
> reason at all has not signed it yet. She says she will try to send him an
> email to process it today.
>
>

>
> Also can you send a copy of wte it is your trying to file so that we can
> read it before it is filed and so that we have a copy and know what’s going
> on please dear?
>
>
>
> Thank you
>
>
>
> On Tue, May 28, 2024 at 11:28 AM True King <truekingfile@gmail.com> wrote:
>
> Baleigh that is Not true it has been received and processed I will call
> them and let them call you we have the confirmation in writing it was
> received and processed
>
>
>
> On Tue, May 28, 2024 at 9:54 AM <baleigh@abshirelawfirm.com> wrote:
>
> I called Lake Charles City Court. Their office advised that Mr. King is
> not pauper and that they have not received a pauper application.
>
>
>
> I need Mr. King to provide our office with the $300 filing fee to be able
> to file the Supplementing Petition to include Hartford Insurance Company.
>
>
>
> *From:* True King <truekingfile@gmail.com>
> *Sent:* Tuesday, May 21, 2024 4:20 PM
> *To:* baleigh@abshirelawfirm.com
> *Subject:* LAKE CHARLES CITY COURT pauper affidavit
>
>
>
> Pauper affidavit processed again yesterday
>
>
>
> Received confirmation
>
>
>

> <truekingfile@gmail.com>
>
>
>
>
>
>
>
>
> Sent from my iPhone
>
>

Gmail

John King <johncjking86@gmail.com>

Parent Teacher Conference and Parent Pick up tomorrow

7 messages

John King <johncjking86@gmail.com> Thu, Sep 29, 2022 at 1:30 PM
To: "tcook1@lakecharlescharter.org" <tcook1@lakecharlescharter.org>
Bcc: "fit4thekings@gmail.com" <fit4thekings@gmail.com>, ijohncjking@gmail.com

PDF aredmon@14jdcfjc.org_20220913…

Good Afternoon Ms Cook,

This is John King Sr, writing to remind you that tomorrow is my court ordered custodial time with My son john king sr. My mother Monica Guillory is the assigned pick up person via court order. Charmaine Colston his mother shares “joint” custody not sole custody and is the “domiciliary parent” not the custodial parent. She has been presenting challenges and blocking custodial time. The judge and hearing officer told me in writing see attached that I am instructed to pick my children up from school tomorrow Sept drop them off on Monday morning.

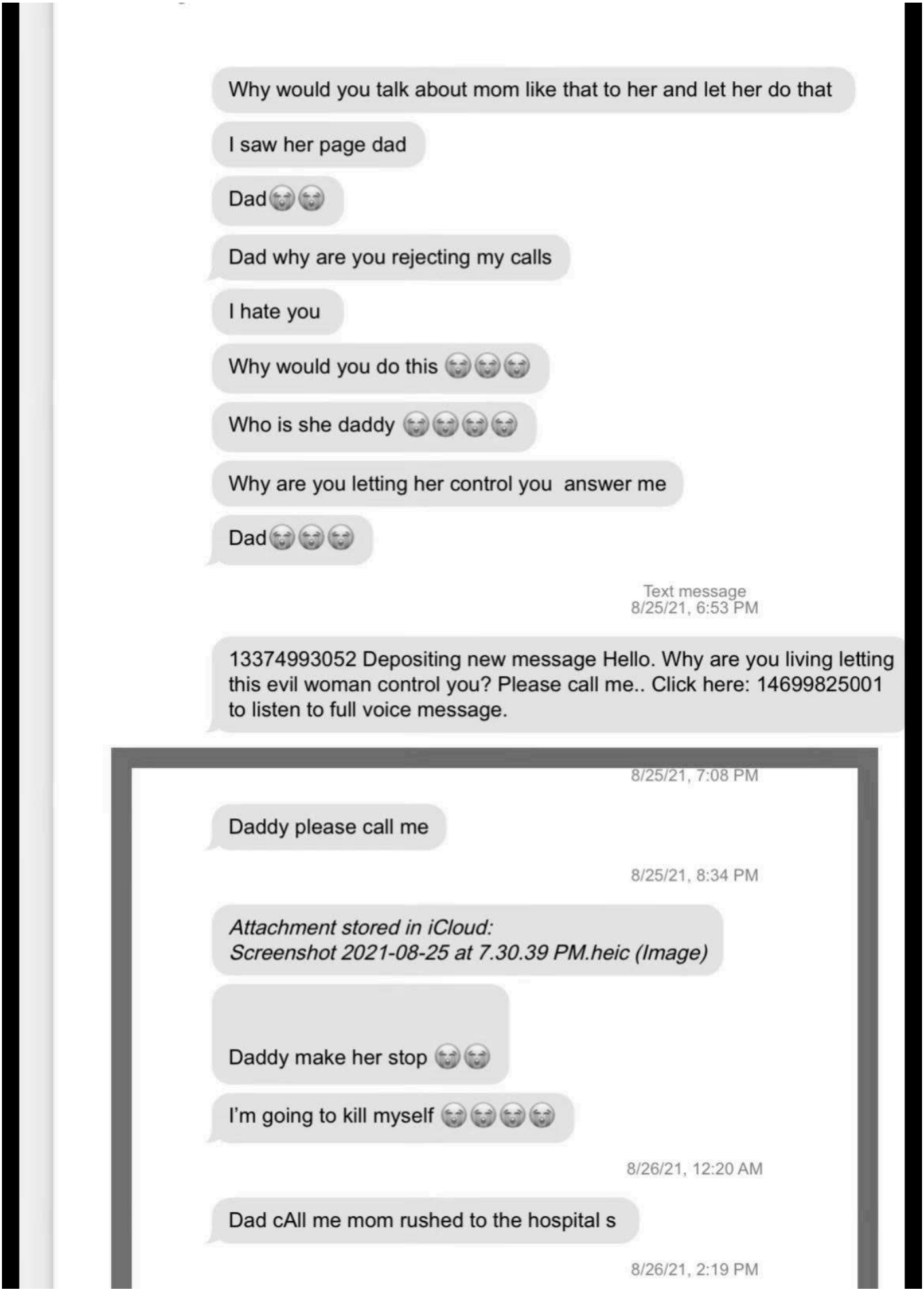
I want to be certain this is meaningful time spent with my children as she is constantly trying to block me from seeing them and she has an active restraining order from Nj which prevents her from knowing my whereabouts and showing up on the same campus at same time as me or contacting me directly. I want to provide these court orders attached and restraining orders so that tomorrow goes smoothly.

Is there anything you can advise as to how to avoid her high conflict behavior and avoid her being in the school office same time as me? Is there someone who can be alerted to aid with this? I am trying my hardest to get to my children but as you can see attached I don’t want issues at the school. The court orders and restraining orders are attached and that’s all that is needed to pick up my children.

Thank you
John King Sr
318-995-1705

Please advise John King Sr
(Enclosed restraining orders and court orders)


46
Colston.charmaine89@gmail.com
We will rise without you
Just dont know how close i am to pulling the fucking trigger!
I HATE YOUR ASS!!
BITCH
So serious !


Why would you talk about mom like that to her and let her do that
I saw her page dad
Dad😡😡
Dad why are you rejecting my calls
I hate you
Why would you do this 😡😡😡
Who is she daddy 😡😡😡😡
Why are you letting her control you answer me
Dad😡😡😡
Text message
8/25/21, 6:53 PM
13374993052 Depositing new message Hello. Why are you living letting this evil woman control you? Please call me.. Click here: 14699825001 to listen to full voice message.
8/25/21, 7:08 PM
Daddy please call me
8/25/21, 8:34 PM
Attachment stored in iCloud:
Screenshot 2021-08-25 at 7.30.39 PM.heic (Image)
Daddy make her stop 😡😡
I'm going to kill myself 😡😡😡😡
8/26/21, 12:20 AM
Dad cAll me mom rushed to the hospital s
8/26/21, 2:19 PM


Dad
Daddy please call me
8/26/21, 4:24 PM
Dad I have been calling , why are you letting this crazy lady keep yo
from us
8/26/21, 6:08 PM
Dad
Daddy please call me
8/26/21, 7:50 PM

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART
COUNTY OF ESSEX

FAMILY
N057
004
JUGBELA

****

STATE OF NJ , PLTF

VS

COLSTON CHARMAINE Y , DEFN

NOTICE OF

ARRAIGNMENT

DOCKET NO.(s):
FO-07-000131-22-F

JOHN C. [redacted] (K0196514)
50-[redacted]

Dear Litigant:

REMOTE ARRAIGNMENT IS SCHEDULED FOR 12:15 P.M ON MARCH 04, 2022 WITH HONORABLE JOHN ZUNIC. YOU MUST ATTEND VIA VIDEO AS SCHEDULED. PLEASE CONTACT THE COURT FOR FURTHER DETAILS.

QUESTIONS ABOUT THIS NOTICE???
CONTACT OFFICE DOMESTIC VIOLENCE, AT 973-776-9300 EXT.56616
BRING THIS NOTICE WITH YOU WHEN YOU APPEAR

DATED: 02/14/22

KESHA MANNING
DIVISION MANAGER, FAMILY PART

REFER TO ABOVE DOCKET NUMBER(S) ON ANY INQUIRES IN THIS MATTER

***PLEASE NOTIFY COURT OF DISABILITY ACCOMMODATION NEEDS ***
*** CALL THE NUMBER LISTED ABOVE THIS MESSAGE ONE WEEK IN ADVANCE IF YOU NEED AN INTERPRETER ***
Llame al numero que figura arriba de este mensaje con una semana de anticipacion si necesita un interprete.

(REV.03/00)

Gmail - Mr Shea evidence of abuse,...

Thank you

FOURTEENTH JUDICIAL DISTRICT COURT
LAKE CHARLES, LOUISIANA

[redacted]

6

parties. And given the age of the two older children, they are certainly welcome to call their father at any time. I don't believe there is objection to that.

MS. TRENT: There is no objection to that, Your Honor; that is correct. Further, the pick-up and drop-off for the summertime -- the pick-up will be from a safe spot which will be a police station that is designated by the court. And since our review will be some time in November during the school year, the children will be picked up directly from the school by Mr. King or one of his agents.

MR. HAWKINS: Again, Your Honor. For the purpose of clarification, pick-up and drop-off for the summer will take place at the Lake Charles Police Department in the safe exchange zone which is monitored by the police. Visitation for the summer -- excuse me for school will take place in accordance with the stipulation from the school with Mr. King or one of his relatives that are duly designated -- Ms. King, excuse me, Ms. Colston is to instruct the school that someone's allowed to pick the children up. Usually there's an authorized pick-up/drop-off. Mr. King will provide the name of the person that's coming, if it's not him. We also have agreed that there is an effectuation clause that if for some reason the children are not able to be picked up or dropped off at

that point, the party that is picking up or dropping off can utilize the Lake Charles Police Department and/or the Calcasieu Parish Sheriff to facilitate an exchange. Hopefully that will not be necessary, but --

MS. TRENT: That is correct, Your Honor. In addition to that, I believe some housekeeping matters

JACLYN ISTRE, CCR
OFFICIAL COURT REPORTER
FOURTEENTH JUDICIAL DISTRICT COURT
LAKE CHARLES, LOUISIANA

On Thu, Sep 8, 2022 at 6:01 PM John King <johncjking86@gmail.com> wrote:

> Mr Shea,
>
> Please see where Ms Lawdins lied again it says here and she agrees that there will be school pickups she twisted her words to say it was discussed. Is the transcript honored or is it not? Who is doing the deciding as to which sentences are honored the

--

J.C.J. King

3 attachments



IMG_2085.jpeg
147K



IMG_2087.jpeg
240K

06.08.2022 Amended TRO 817-22.pdf
214K

Tammey Cook <tcook1@lakecharlescharter.org> Thu, Sep 29, 2022 at 7:05 PM
To: John King <johncjking86@gmail.com>, Farrah Eckard <feckard@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>

Hello Mr. King,

Unfortunately I am away from work until Tuesday. I am forwarding this email to the principals and assistance principal who can assist you in this matter.

Sent from my iPhone

> On Sep 29, 2022, at 6:31 PM, John King <johncjking86@gmail.com> wrote:
>
> **Security WARNING**
> This is an external email. Do not click links or open attachments unless you recognize the sender and know that the content is safe.
>
> aredmon@14jdcfjc.org_20220913… [drive.google.com]
>
> [Quoted text hidden]

--
J.C.J. King

---

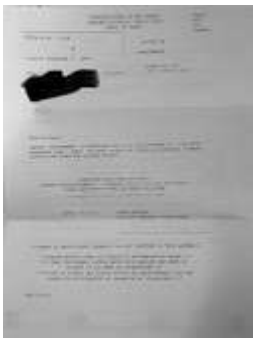
11 attachments



IMG_2083.jpeg
61K



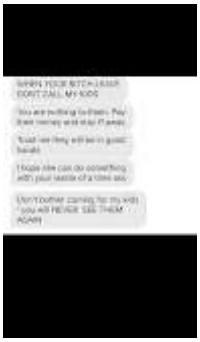
IMG_2084.jpeg
225K



IMG_2086.jpeg
15K



IMG_2082.jpeg
17K



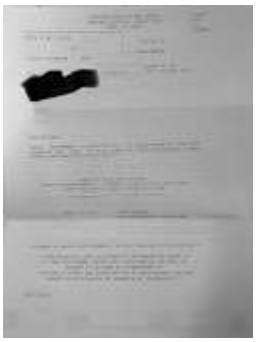
IMG_2085.jpeg
147K



IMG_2087.jpeg
240K



IMG_2083.jpeg
61K



IMG_2086.jpeg
529K



IMG_2082.jpeg
405K



IMG_2084.jpeg
225K

06.08.2022 Amended TRO 817-22.pdf
214K

John King <johncjking86@gmail.com> Thu, Sep 29, 2022 at 8:24 PM
To: Tammey Cook <tcook1@lakecharlescharter.org>
Cc: Farrah Eckard <feckard@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>

The court order is attached at top of the email .

Please see attached.

aredmon@14jdcfjc.org_20220913…

[Quoted text hidden]
--
J.C.J. King

Tammey Cook <tcook1@lakecharlescharter.org> Thu, Sep 29, 2022 at 8:56 PM
To: John King <johncjking86@gmail.com>, Farrah Eckard <feckard@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>

We've reviewed all documents. Monica can pick up the kids but it is recommended that she is accompanied by someone from the sheriff's department to avoid any unwarranted protest from Charmaine.

Sent from my iPhone

> On Sep 30, 2022, at 1:25 AM, John King <johncjking86@gmail.com> wrote:
>
> **Security WARNING**
> This is an external email. Do not click links or open attachments unless you recognize the sender and know that the content is safe.
>
> The court order is attached at top of the email .
>
> Please see attached.
>
> aredmon@14jdcfjc.org_20220913… [drive.google.com]
>
> [Quoted text hidden]

John King <johncjking86@gmail.com> Fri, Sep 30, 2022 at 12:21 PM
To: Tammey Cook <tcook1@lakecharlescharter.org>
Cc: Farrah Eckard <feckard@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>

Thank you for responding. We're trying to get this done with least amount of conflict but that seems to be impossible as Charmaine is aware she is once again blocking access to my children intentionally against the court order.

She is not allowed to check them out on my pick up days or be on the campus. She has been constantly contacting their schools last couple weeks to block the court order.

The sheriff needs a civil warrant or has to wait until the crime or violence occurs before they can do anything. Unless you have the email to send to the hearing officer that says she's telling you guys not to allow me to see my children .

Please let me know next steps.
John King Sr.
[Quoted text hidden]
--
J.C.J. King

John King <johncjking86@gmail.com> Mon, Oct 3, 2022 at 4:01 PM
To: Tammey Cook <tcook1@lakecharlescharter.org>
Cc: Farrah Eckard <feckard@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>

Good afternoon,

Thank you for reviewing the emails. I will be coming more often to see my children and Friday Charmaine put up alot of challenges that the courts have told her to stop doing. Because of the dangerous nature and her recent erratic behavior claiming my children are threatening suicide and murder in order to try to get me to answer the phone for her I want to attend safely and support their activities until the custody trial is completed.

Could someone please alert John Jr football coach and campus security to make sure they have the court orders and restraining orders and the threats so that they are aware that conflict is likely to occur at his games/ practice etc. I do not want this for my children I only want to exercise joint custody as I always have been. Also please note that Charmaine is not my wife and never has been married to me. I am Married to a good woman and that is the reason for Charmaine behavior and why she is hurting my children. I hope and pray this is resolved safely very soon and I will try to minimize the Chance for conflict until we go to court on Nov 15, 2022

Thank you all I'm trying my best.
Tell John Jr I love him and will see him soon
Thank You
JK
[Quoted text hidden]
--
J.C.J. King

John King <johncjking86@gmail.com> Thu, Feb 22, 2024 at 4:10 PM
To: baleigh@abshirelawfirm.com, dustan@abshirelawfirm.com

Dustin for your records. Even the school counselor said charmaine was protesting me picking my son up from school. Additional evidence of her lies attached. This is bold parental alienation

J.C.J. King
[Quoted text hidden]

Letter

From: Kay Bang <kay.bang@lccitycourt.org>

To: "truekingfile@gmail.com" <truekingfile@gmail.com>

Cc: Monica Abshire <mabshire@lccitycourt.org>

Date: Mon, 17 Nov 2025 21:25:23 +0000

Attachments:
MX-M264N_20251117_155017.pdf

Mr. King,

Please see the attached letter from Judge Jamie Bice regarding your most recent filings, along with an updated Cost Bill.

The original letter with attachments will be sent to you today via Certified Mail, Return Receipt Requested.

Best regards,

Kay Bang

Kay Bang
Court Administrator and Judicial Paralegal
Lake Charles City Court
118 W. Mill Street
Lake Charles, LA 70601
337-491-8699 office
337-491-8676 fax
kay.bang@lccitycourt.org<mailto:kay.bang@lccitycourt.org>

JAMIE B. BICE, JUDGE
RONALD C. RICHARD, JUDGE

OFFICE: 337-491-1305
FAX: 337-491-8676

CIVIL SECTION: 337-491-1564
CIVIL FAX: 337-491-1303

VIOLATION BUREAU: 337-491-1565
VIOLATION FAX: 337-491-8745

LAKE CHARLES CITY COURT
WARD 3 CALCASIEU PARISH

P.O. Box 1664/118 West Mill Street
Lake Charles, LA 70602-1664/70601-4217
www.lccitycourt.org

November 14, 2025

Mr. John Clifford King, Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601
Via CMRRR and email truekingfile@gmail.com

Re: Civil Action No. 23-2124; John Clifford King v Renee Amos

Dear Mr. King:

Our Clerk of Court has notified me of two fax filings you recently submitted in the above-referenced matter. Please be advised that those filings have been time-stamped but not filed into the record because once an appellate decision becomes final under La. C.C.P. art. 2166 and 2167 (as is the case in the above-referenced matter), the judgment acquires *res judicata* effect which bars further litigation of issues that have already been adjudicated. Simply stated, *res judicata* means that an issue that has been definitively settled by judicial decision. The essential elements of *res judicata* are (1) an earlier decision on the issue, (2) a final judgment on the merits, and (3) the involvement of the same parties, or parties in privity with the original parties. *Black's Law Dictionary,* 12th edition.

La. C.C.P. art. 2166 provides that "the judgment of a court of appeal becomes final and definitive if neither an application to the court of appeal for rehearing nor an application to the supreme court for a writ of certiorari is timely filed." La. C.C.P. art. 2166. Our records do not reflect that you filed an application for rehearing with the Third Circuit Court of Appeal following its judgment entered on May 21, 2025. Likewise, La. C.C.P. art. 2167 states that "a judgment of the supreme court becomes final and definitive when the delay for application for rehearing has expired and no timely application therefor has been made."

Additionally, La. R.S. Section 13:4231 codifies the *res judicata* doctrine, providing that "a valid and final judgment is conclusive between the same parties, except on appeal or other direct review." This means that once an appellate judgment becomes final and definitive, any subsequent proceedings in the trial court must be authorized by the remand instructions or must fall outside the scope of the issues already decided. As no such authorization exists here, and this matter has been closed at Lake Charles City Court, the two faxed documents you submitted are being **returned** to you. Finally, any future filings in a matter that has been fully adjudicated and after

all appeals have been exhausted may subject the filer to sanctions, including contempt of court. La. C.C.P. art. 224.

With regard to the cost bill sent to you on May 28, 2025 and again on July 10, 2025, please be aware that La. C.C.P. art. 5186 and 5188 establish that indigent parties (pauper status) who do not prevail on the merits of a case are still responsible to pay costs as cast. More specifically, La. C.C.P. art. 5186(c) states that when an indigent party loses, costs become due. Enclosed is an updated Cost Bill for your review. This updated Cost Bill reflects the Third Circuit ruling of May 21, 2025 and has been adjusted as a result. If you have any questions about the cost bill, please call Monica Abshire at 337-491-1564.

Sincerely,

Jamie B. Bice
Chief Judge, Lake Charles City Court

JBB/kb

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

November 17, 2025
UPDATED

TO: John Clifford J. King
123 N. Louisiana Ave
Lake Charles, LA 70601
Email: truekingfile@gmail.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5397.36 minus Credit $105.00 = New Balance of $5292.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)
Subject to Credit:	$105.00

Please remit payment to Lake Charles City Court for the amount listed above.
Credit cards are assessed an online transaction fee

If you have any questions about the named suit above, please call the Civil office at (337)491-1564.

Monica Abshire
Clerk of Court

FAX COVER SHEET

TO	Lake Charles City Fax
COMPANY	lake charles city court
FAX NUMBER	13374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 18:52:44
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is SUPPLEMENTAL FAX attached to earlier fax dated for today 11/13/2025

Notice of Lack of Jurisdiction and Divestiture Confirmation

Plaintiff submits this Notice to confirm that the Court was divested of jurisdiction on December 3 2024 upon the granting of a devolutive appeal pursuant to Louisiana Code of Civil Procedure article 2088. From that date forward the Court lacked authority to issue orders conduct hearings impose costs generate service attempts rescind pauper status or issue contempt citations. All actions taken after divestiture are void ab initio.

The Court nevertheless conducted hearings on December 18 and December 30 2024 generating additional costs service returns and contempt related entries. These actions were taken without authority and are null. Plaintiff submits this Notice to ensure that no post divestiture fees orders or actions are enforced now or in the future.

ELECTRONIC

FILE DATE: 11-13-2025

Emergency Notice of Prohibited Fee Enforcement

Plaintiff submits this Emergency Notice to preserve all rights before expiration of the statutory period and to document ongoing prohibited enforcement attempts. Plaintiff contacted the Clerk of Lake Charles City Court on this date to request removal of fees and costs that were entered after the Court was divested of jurisdiction on December 3 2024. The Clerk refused and stated that Judge Ronald C Richard is demanding that Plaintiff pay these fees.

All fees assessed after December 3 2024 are void under Louisiana Code of Civil Procedure article 2088. The Court lacked authority to issue orders hold hearings generate service returns or impose costs. Plaintiff has never provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and any fees based on those returns are fraudulent and unenforceable.

The Clerk refusal to remove void fees and the judge ongoing demand for payment constitute retaliation intimidation and abuse of authority. Plaintiff submits this Notice to ensure the record reflects that Plaintiff has objected to all post divestiture fees and that any attempt to enforce them now or in the future is unlawful and constitutes retaliation under state and federal law.

Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

ELECTRONIC

FILE DATE: 11-13-2025

Notice of Correction of False Addresses and Appellate Misrepresentations

Plaintiff submits this Notice to correct multiple inaccuracies and fabricated statements that appear in the record. Plaintiff has never lived in or provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and all fees assessed for service at that location were created without factual basis and must be removed immediately.

Additionally statements made by attorney Mr Bauman regarding the location of a homicide are false. The incident referenced in the appellate filings occurred in Houston Texas not Iowa Louisiana. The claim that Plaintiff spouse called helicopters is also false and unsupported. These misrepresentations distorted the appellate record and contributed to inflated court costs and retaliatory actions taken by the Court.

Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

ELECTRONIC

FILE DATE: 11-13-2025

Monica Abshire

From: Monica Abshire
Sent: Friday, November 14, 2025 7:36 AM
To: truekingfile@gmail.com
Subject: Emailing: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax
Attachments: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax.pdf

Please see attached the Affidavit of Transmission on Supplemental Fax to 11/13/2025 filings.

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King v Amos - Affidavit of Transmission - Supp. Fax

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Affidavit of Transmission

Attention: John C King Sr Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C King Sr vs Renee Amos – 4 pages received – Notice of Lack of Jurisdiction and Divestiture Confirmation; Emergency Notice of Prohibited Fee Enforcement; Notice of Correction of False Addresses and Appellate Misrepresentations

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Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

FAX COVER SHEET

TO	Clerk Abshire
COMPANY	
FAX NUMBER	3374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 12:40:05
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is a fax

23-2124 COVER LETTER

TO CLERK OF COURT

LAKE CHARLES CITY COURT WARD THREE

Please file the enclosed Motion Proposed Order and Certificate of Service in Case Number 23 2124 King versus Amos.

Respectfully

John C King Sr

Combined Motion to Vacate Divested Orders

NO 23 2124

CITY COURT OF LAKE CHARLES

WARD THREE

CALCASIEU PARISH LOUISIANA

JOHN C KING SR

Plaintiff

versus

RENEE AMOS AND THE HARTFORD

Defendants

Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard

Plaintiff John C King Sr submits this motion to preserve all rights before the statutory deadline. Plaintiff requests that the Court vacate all actions taken after divestiture of jurisdiction remove all improper and retaliatory costs strike all contempt related actions seal identifying information and recuse Judge Ronald C Richard due to bias hostility and misconduct.

Background

Plaintiff is the sole plaintiff in this matter. His spouse S J K has never been a party to this case. Judge Richard nevertheless ordered her to appear in court without jurisdiction service or lawful authority. She is a non resident and a protected crime victim.

Summary of Misconduct

Judge Richard did the following

Accused spouse of practicing law without basis.

Forced a non resident non party to appear under threat.

Threatened to send the District Attorney across state lines.

Denied Plaintiff and spouse access to legal counsel.

ELECTRONIC

FILE DATE: 11-13-2025

Forced disabled spouse to remain without medical accommodation.

Ordered courtroom doors locked during the November 2024 hearing.

Read spouse private address into the public record.

Created circumstances leading to a December 11 2024 intruder incident in Houston Texas.

Lost jurisdiction on December 3 2024 under article 2088.

Held hearings on December 18 and December 30 after divestiture.

Rescinded pauper status without a contradictory hearing.

Created fabricated Iowa Louisiana service addresses and false fees.

Issued retaliatory contempt without cause or notice.

Allowed false appellate statements by Mr Bauman including a false claim the homicide occurred in Iowa Louisiana.

Ignored that neither of Plaintiff parents ever lived in Iowa Louisiana.

Legal Basis

Orders after December 3 2024 are null under article 2088.

Recusal required under article 151.

Constitutional violations include amendments One Four and Fourteen.

Misconduct violates Louisiana Revised Statutes 14 134 14 118 14 122.

Disability protections under ADA Title Two were violated.

Victim protections under Louisiana and federal law were violated.

Relief Requested

Recusal of Judge Ronald C Richard.

Vacatur of all orders rulings costs and contempt actions after December 3 2024.

Removal of all fabricated service fees linked to Iowa Louisiana addresses.

Sealing of any document that contains Plaintiff or spouse identifying information.

Reassignment to an impartial judge.

Any further relief necessary to protect Plaintiff from retaliation.

Respectfully submitted

John C King Sr

123 N Louisiana Avenue

Lake Charles Louisiana 70601

Certificate of Service

I certify that a copy of this motion was served on all parties by email on this date.

Signed John C King Sr

23-2124 CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I certify that the Combined Motion Proposed Order and Cover Letter were served via email on all parties on November 13 2025.

Signed

Verified by pdfFiller
11/13/2025

John C King Sr

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

ACTS FAX

ACTS FAX **ACTS FAX ACTS** FAX **ACTS** FAX

ACTS FAX

DATE:

02/06/2025

From:

Heather Goleman, Deputy Clerk

(337) 433-9403

SUBJECT: **Louisiana** 3rd **Circuit Case** No. **CW** 25 **00044**

Lower Court Case No.: 2023-2124

Calcasieu

Fourteenth Judicial **District** C

To:

JOHN CLIFFORD J. KING VERSUS

RENEE AMOS NOTARY **PUBLIC**

ID #29374 **AND HARTFORD**

FIRE **INSURANCE** COMPANY

Hon. Ronald C. Richard Attorney at Law
330 Alamo Street
Lake Charles, LA 70601 Fax No.
(337) 494-1793 Work No. (337)
494-1900

Oliver Jackson Schrumpf Schrumpf &
Schrumpf 3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

LZS-1 8000/10ood L6Z-1

0697-161-*L88*

01001 PAY MORE 90:60 92-90-20

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson
Schrumpf

Edward Kelly Bauman

Counsel for:
John Clifford J. King

Counsel for:
Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider... motions [regarding pauper status]" Mason v. *Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v.* Ferrington, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of *the* order of appeal, the trial court does not have jurisdiction to hear *the* pro se motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

LZ8-1 8000/2000d 163-1

0692-167-188

o PAY WOUD 90:60 92-90-20

SIZ SJG

JWP

Affidavit of Transmission

Attention: John C. King Sr

Fax No. 508-524-2132

Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C. King Sr vs. Renee Amos – 12 pages received – Combined Motion to Vacate Divested Orders

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

Monica Abshire

From: Monica Abshire
Sent: Thursday, November 13, 2025 4:01 PM
To: True King
Subject: Emailing: 23-2124 King vs Amos - Affidavit of Transmission
Attachments: 23-2124 King vs Amos - Affidavit of Transmission.pdf

Please see attached the Affidavit of Transmission.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs Amos - Affidavit of Transmission

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Letter and Plea to Civil Court Judge Small Claims

John CJ King Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601
johncjking86@gmail.com **July 02, 2023**

VS Case # 23-1206

Charmaine Y. Colston
(through her attorney)

Dear Honorable Judge Lake Charles City Court, Civil Divison Lake Charles Louisiana. A terrible injustice has occurred wherein my property was taken via title fraud and forgery by force from my ex girlfriend while under two restraining orders. One of which was for stalking. Additionally I had no access to an open investigation for case number 2021-00123665 until the detective released it November 2023 confirming without a doubt that the suspect Charmaine Y Colston had committed title fraud by

1. **Fraudulantly appearing in front of a notary whom was a friend while I was not in the state on 09/07/2021 and intentionally and knowingly while under a restraining order forged my signature onto a notarized document of notary Renee Amos. I was 2000 miles away on this day and there is no way I could have been in the state of Louisiana and this is confirmed by Charmaine Colston herself and a thorough investigation by the Calcasieu Parish Sheriff Department and Lake Charles Police Department. Evidence attached shows Charmaine Colston fraudulently and intentionally stealing my car title even though she was under a restraining order. These exceptions for stalking, restraining order and period of discovery as shown within the investigation shows I am well within the statute of limitations. As the defendants attorney herself made a motion saying I must "prove" through evidence that she stole the car. This evidence was released to me November 2022 and I proceeded to seek the proper remedy.**
2. **Charmaine Colston abused her position as a former employee with the city of Sulphur LA where her previous role was the transfer of auto titles for the city. Witness testimony will confirm that Charmaine Colston maliciously and intentionally engaged in scams to obtain my assets illegally. She was trained in how to do so and if you refer to the investigation conducted by Detective Castille You will see without a donut on camera that I was not there when she stole the title to my car and transferred the joint assets of myself and my spouse. The Chevrolet Traverse was obtained by title fraud the results of the investigation confirm this and she not only has scammed me but also did a fake racial discrimination lawsuit against the City of Sulphur when she was fired for disorderly conduct. She used the race card to file suit and obtain a $55k settlement from the City of Sulphur Louisiana, Colston has aslo engaged in FEMA fraud, forged life insurance and securities fraud of which the stolen policies had to be reissued back to me with a formal apology. Colston forges multiple documents pretending to be my spouse and although my ex girlfriend we have never been**

married or represented ourselves as married. I have over 35 pages of evidence from independent investigations that prove that Charmaine intentionally got the title notarized when I was not present by fraud. She also claims to have paid me "$100" for the car of which I have never received payment and it would have been impossible as Colston was under a restraining order in two different states at the time.

3. **I am asking that the dates be rescheduled to allow me the opportunity to be able to walk and my broken bones heal from my many surgeries. I humbly ask if it can be accommodate that the court notice from the Doctors note that I cannot add pressure unto my bones until after August 31, 2023 I ask the court if possible to have the hearing on a non physical therapy date the available dates are**
    a) **9/14/2023- 09/15/2023**
    b) **09/21/2023 - 09/22/2023**
    c) **10/4/2023- 10/6/2023**
    d) **10/19/2023 - 10/20/2023**

Monday - Wednesday are difficult as I have physical therapy so I humble ask that if this can be accommodated please do so.

Enclosed. You will find evidence that without a doubt shows Charmaine Colston stole my car with Maliceand as a result it has affected my ability to have transportation and employment. There are also several liens and bills against the vehicles such as tolls, lack of insurance etc that are my liability and I do not possess the financial means to recover from a robbery of this scale. Please allow me the opportunity to subpoena my witnesses from the local and state governments who conducted the investigations.

Thank You for your courtesy with this delicate matter.

John CJ King

AFFIDAVIT OF MONICA GUILLORY

I, **Monica Guillory**, fear for the life and safety of my son **John King Sr.**, my grandchildren, my son's spouse **Mrs. John King Sr.**, our family, and our extended family due to the ongoing harassment, coercive control, and civil rights violations perpetrated by **Charmaine Y. Colston** over the past **17+ years**.

Statement of Facts

1. **Pattern of Stalking, Harassment, and Coercive Control**
    - Charmaine Colston has engaged in **continuous harassment and coercive control**, which includes **electronic surveillance, hacking, social media harassment, false legal claims, excessive litigation, fraudulent court filings, and threats** against my family.
    - Under **Louisiana Revised Statutes § 14:40.2**, **stalking** is defined as **intentional and repeated harassment that causes a person to feel alarmed or distressed**, including threats of harm to the victim's safety. Ms. Colston has exhibited such behavior continuously.
2. **Mail Fraud and False Representation as a Government Agency**
    - Over the past **two years**, Ms. Colston has sent fraudulent mail to my home **misrepresenting herself as a government agency**, violating **18 U.S. Code § 1341 (Mail Fraud)** and **18 U.S. Code § 912 (False Impersonation of a Government Official)**, both federal offenses.
    - She has **illegally enrolled my address in USPS Informed Delivery, intercepted and removed mail from my mailbox**, violating **U.S. Postal Regulations (18 U.S. Code § 1708 - Theft of Mail Matter)**.
3. **Illegal Stipulated Judgment & Judicial Misconduct**
    - On **May 31, 2022**, I personally witnessed an **illegal stipulated judgment** in which Attorney **Scott Hawkins** and **Orelia Lawdins-Trent** falsely claimed my son **agreed to a judgment**, violating his **due process rights** under the **Fifth and Fourteenth Amendments of the U.S. Constitution**.
    - **Judicial Canon 2, Louisiana Code of Judicial Conduct**, prohibits judges from engaging in conduct that undermines the **integrity and impartiality** of the judiciary. The judicial actions taken in **Case #2021-2773 before Judge Mitchell Redd** directly violate these ethical guidelines.
4. **Hacking, Electronic Surveillance, and Privacy Violations**
    - Ms. Colston has **illegally accessed emails, texts, and GPS tracking** of multiple family members, including myself, **John King Sr.**, and **John T. King**, violating:
        - **18 U.S. Code § 1030 - Computer Fraud and Abuse Act (CFAA)**

        - **Louisiana R.S. 14:73.5 - Unlawful Access to Stored Communications**
5. **Child Endangerment & Psychological Abuse of Grandchildren**

    - Ms. Colston has placed my **grandchildren in danger** for over a decade, including a **documented incident where she attempted to drive into an oncoming train**, threatening to **kill everyone in the car** unless my son unlocked his phone.
    - Under **Louisiana R.S. 14:93 - Cruelty to Juveniles**, her actions constitute **child endangerment** and **psychological abuse**, punishable under Louisiana law.
6. **Excessive Litigation as Coercive Control**

    - Ms. Colston has engaged in **malicious prosecution** and **excessive litigation** as a form of **harassment and coercive control**, violating:
        - **Louisiana Code of Civil Procedure Art. 863 - Frivolous Pleadings & Abuse of Process**
        - **42 U.S. Code § 1983 - Civil Action for Deprivation of Rights**
7. **Federal Restraining Order and Property Exclusion**

    - **Effective immediately**, I, **Monica Guillory**, along with **John King Sr. and our entire immediate family**, will be filing a **federal restraining order** against **Charmaine Y. Colston**.
    - As a **homeowner**, I have the legal right under **Louisiana Civil Code Art. 3421** and **Fourth Amendment property rights** to **exclude any individual from my property whom I deem a threat to safety**. Ms. Colston is:
        - **Prohibited from visiting any immediate family residences or businesses**
        - **Banned from hacking, social media harassment, GPS tracking, and stalking through third-party representatives**
        - **Forbidden from using stolen text messages, recordings, or documents** against our family
8. **Recent Escalation of Threats & Public Acts of Instability**

    - In **September 2024**, Ms. Colston **auctioned off birthday presents** purchased by our family for **Jayla and John King Jr.**, an act of **emotional instability and psychological manipulation**.
    - In **December 2024**, **death threats were sent from anonymous Google numbers**, increasing the need for **immediate legal intervention**.
9. **Contradictory Statements in Court & Continued Harassment**

    - Ms. Colston **claimed in court that my grandchildren did not want to see their father**, yet she **privately begs to be in his presence** and has **attempted to interfere in his marriage**.
    - She has **falsely signed legal documents in my son's name through third parties**, a criminal offense under **Louisiana R.S. 14:72 - Forgery**.

Legal Notice to Charmaine Colston & Her Counsel

This affidavit serves as **official notice** that Ms. **Charmaine Y. Colston** is **prohibited** from:

1. **Entering any property owned or occupied by the Guillory or King families**
2. **Contacting, harassing, or interfering with our family in any manner**
3. **Accessing emails, social media, or electronic communications**
4. **Engaging in litigation as a form of harassment**
5. **Using third parties to stalk, harass, or collect information on our family**

Conclusion

Ms. **Charmaine Y. Colston** has repeatedly violated **state and federal laws** related to **harassment, stalking, mail fraud, forgery, hacking, child endangerment, and coercive control**. The ongoing misconduct, threats, and legal manipulation **will no longer be tolerated**.

We, **Monica Guillory and the immediate family of John King Sr.**, are **pursuing all available legal remedies**, including:

- **Federal Restraining Order**
- **Legal Action under Louisiana and Federal Law**
- **Affidavits prohibiting access to all family homes & businesses**

This affidavit is **sworn under penalty of perjury** and will be **submitted with exhibits** documenting:

- **Mail fraud committed by Ms. Colston**
- **Threats and harassment directed at our family**
- **Slanderous statements made online**

Executed this ____ day of _____, 2025
Monica Guillory
123 North Louisiana Avenue
Lake Charles, Louisiana 70601
kmonica610@gmail.com

Sworn before me this ____ day of _____, 2025
Notary Public Signature & Seal

IN RE: JOHN CLIFFORD J. KING

Lake Charles City Court

Calcasieu Parish, Louisiana

Filed _____

_____
Deputy Clerk of Court

MOTION TO BE EXCUSED FROM HEARING

Now comes Oliver "Jackson" Schrumpf, attorney, individually, who respectfully shows:

1. On November 7, 2024, Movant enrolled as attorney for John King in the matter entitled John King vs. Rene Amos, No. 2023-2124, Lake Charles City Court.
2. The King vs Amos matter was tried on November 14, 2024.
3. Judgment was signed in that matter on November 21, 2024 and Notice of Judgment was mailed by the Clerk on the same day.
4. An order granting a devolutive appeal of that judgment was granted on December 5, 2024.
5. In accordance with La. C.C.P. Art. 2088. Divesting of jurisdiction of trial court:

   A. **The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, ... on the granting of the order of appeal, in the case of a devolutive appeal.** Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following: (none applicable in this case).
6. John King has subsequently filed other pleadings in Lake Charles City Court and John King, and his wife, have been cited to appear in other matters not involving the Judgment subject to appeal. (Even if the wording of the pleadings filed by King was vague or ambiguous, or even if it intended to refer to the judgment in 2023-2124, regardless, the Court would not have jurisdiction to take any action on that particular matter because the jurisdiction of the Court is "divested").
7. Oliver "Jackson Schrumpf does not represent the John King or Shunte King in the contempt matters or any other matters other than the devolutive appeal in King vs. Rene Amos, No. 2023-2124.

8. On December 18, 2024, after e-mail exchanges by the Judge's paralegal and Oliver Schrumpf, the Court, Judge Ron Richard, called Oliver Schrumpf and, by telephone, ordered Schrumpf to appear at a hearing on December 30, 2024 at 9:00 AM. Schrumpf protested that he does not represent the Kings on the newly filed pleadings or on the contempt matters. Judge Richard, nevertheless said that the King pleadings sought recusal of the judge as to all judgments, which Judge Richard believes means even the judgment described in paragraph 3 above.

9. As attorney for John King in the King vs. Rene Amos, No. 2023-2124, Oliver Schrumpf here shows that the trial court's jurisdiction over that judgment has been divested and no action can be taken as to that judgment by the trial court.

Accordingly, Oliver Schrumpf requests the Court rescind its order for Oliver Schrumpf to appear on December 30, 2024 and excuse Oliver Schrumpf from appearing, reserving to John King the right to retain other counsel to represent him in that matter.

Respectfully Submitted By

SCHRUMPF LAW OFFICE,
A PROFESSIONAL LAW CORPORATION

BY: Oliver Schrumpf
OLIVER "JACKSON" SCHRUMPF
LA Bar Roll No. 11832
3801 Maplewood Drive
Sulphur, LA 70663
Tel - 337/625-9077
Fax-337-625-8231
oschrumpf@schrumpf-law.com

O R D E R

Considering the foregoing Motion, let OLIVER "JACKSON" SCHRUMPF be excused from appearing at the hearing currently fixed for December 30, 2024 at 9:00 AM.

SIGNED in Chambers in Lake Charles, Louisiana, on this _____ day of _____, 2024.

_____
RON RICHARD, CITY JUDGE

CERTIFICATE OF SERVICE

I CERTIFY THAT A COPY OF THE FOREGOING pleading has been mailed to counsel for all parties, by depositing a copy of same in the U.S. Mail, properly addressed and postage prepaid.

Kamie T. Dominic
Law Offices of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles LA 70601

also VIA EMAIL: kamiedominiclaw@gmail.com

And

Ed K. Bauman
1801 Ryan St,
Lake Charles, LA 70601

also VIA EMAIL: ed@lakecharlesattorney.com

JOHN CLIFFORD J. KING via e-mail: truekingfile@gmail.com

Sulphur, Louisiana , this 19th day of December, 2024.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

STATE OF LOUISIANA
SECRETARY OF STATE

R. Kyle Ardoin
Secretary of State

Notary Division
(225) 925-4704

Fax Numbers
(225) 932-5359 Notary

TRANSMITTAL INFORMATION
For All Notary Filings

JCK

~~John C. King Sr.~~ John Clifford King
Name of person filing document

123 N. Louisiana Ave.
Address

Lake Charles	Louisiana	70615
City	State	Zip Code

318-995-1705		johncjking86@gmail.com
Daytime phone number	Fax number	Email address

R. Kyle Ardoin
Secretary of State

COMPLAINT ALLEGING UNAUTHORIZED EXERCISE OF NOTARIAL POWERS

La. R.S. 35:601 *et seq*.

RETURN COMPLETED FORM TO:
Secretary of State Notary Division,
P.O. Box 94125
Baton Rouge, LA 70804

Parish of Calcasieu

Before me, the undersigned authority came and appeared the undersigned complainant, who in accordance with the provisions of La. R.S. 35:603, and being duly sworn, did depose and say that

Renee Amos — **Printed name of subject of complaint**

29374 — **Notary ID# if known**

is in violation of the following provision(s) of La. R.S. 601 *et seq*. (UNAUTHORIZED EXERCISE OF NOTARIAL POWERS)

Violation(s): check all that apply

_____ Commission or authority to exercise notary function is statutorily or judicially suspended.
_____ Commission or authority to exercise notary function is statutorily or administratively revoked.
_____ No longer validly commissioned**.**
_____ Commission in retirement status under provisions of R.S.35:202(G)
_____ No longer validly possessed of the office or position from which authority to exercise notarial functions were derived**.**
_____ Convicted of a felony and has not been pardoned.
__✓__ Not authorized by law to exercise that particular notarial function**.**
__✓__ Violated any provision of any law governing the office of notary or the exercise of notary authority**.**
_____ Abandoned his commission.
_____ Failed to pay over money entrusted to him in his official capacity as a notary public.
_____ Failed to satisfy any final judgment rendered against him in his official capacity as a notary public.
__✓__ Not authorized to exercise notarial powers**.**

Complainant's statement to include details of violation(s), its nature, the dates, time(s), address(es) where violation(s) occurred and address of subject of the complaint. (attach additional page(s) if necessary):

On September 7, 2021 Amos notarized a document, stating that I sold my car to Charmaine Colston. I did not sell my car to Colston and I was not in louisiana or present in the action of said notary. I was not in louisiana when Colston walked in the office of Amos to get my title notarized and transfered to her which resulted in the transfer of my title to colston, which was entirely unknown to me at the time of the transaction. I became aware of the situation months after.

Complainant name: ~~John C King Sr.~~ John Clifford King JCK **Phone:** 318-995-1705

Complainant address: 123 N. Louisiana Ave. **City, State, Zip:** Lake Charles, LA 70601

State of Florida, County of Palm Beach

Signature of Complainant

Sworn to and subscribed before me this ~~28th~~ 26 day of ~~April~~ March, 20 23

He/she is personally known __ or has produced ✓ driver's license, as identification.

Signature of notary

EGLARINE HARRISON
Notary Public - State of Florida
Commission # HH146993
Expires on October 11, 2025

Eglarine Harrison — Printed name of notary

HH146993 — FL ~~La.~~ Notary ID#

Notarized online using audio-video communication

STATE OF LOUISIANA
SECRETARY OF STATE

R. Kyle Ardoin
Secretary of State

Notary Division
(225) 925-4704

Fax Numbers
(225) 932-5359 Notary

TRANSMITTAL INFORMATION
For All Notary Filings

JCK

~~John C. King Sr.~~ John Clifford King
Name of person filing document

123 N. Louisiana Ave.
Address

Lake Charles	Louisiana	70615
City	State	Zip Code

318-995-1705		johncjking86@gmail.com
Daytime phone number	Fax number	Email address

R. Kyle Ardoin
Secretary of State

COMPLAINT ALLEGING UNAUTHORIZED EXERCISE OF NOTARIAL POWERS

La. R.S. 35:601 *et seq*.

RETURN COMPLETED FORM TO:
Secretary of State Notary Division,
P.O. Box 94125
Baton Rouge, LA 70804

Parish of Calcasieu

Before me, the undersigned authority came and appeared the undersigned complainant, who in accordance with the provisions of La. R.S. 35:603, and being duly sworn, did depose and say that

Renee Amos — **Printed name of subject of complaint**

29374 — **Notary ID# if known**

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Violation(s): check all that apply

_____ Commission or authority to exercise notary function is statutorily or judicially suspended.
_____ Commission or authority to exercise notary function is statutorily or administratively revoked.
_____ No longer validly commissioned**.**
_____ Commission in retirement status under provisions of R.S.35:202(G)
_____ No longer validly possessed of the office or position from which authority to exercise notarial functions were derived**.**
_____ Convicted of a felony and has not been pardoned.
__✓__ Not authorized by law to exercise that particular notarial function**.**
__✓__ Violated any provision of any law governing the office of notary or the exercise of notary authority**.**
_____ Abandoned his commission.
_____ Failed to pay over money entrusted to him in his official capacity as a notary public.
_____ Failed to satisfy any final judgment rendered against him in his official capacity as a notary public.
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Complainant name: ~~John C King Sr.~~ John Clifford King JCK **Phone:** 318-995-1705

Complainant address: 123 N. Louisiana Ave. **City, State, Zip:** Lake Charles, LA 70601

State of Florida, County of Palm Beach

Signature of Complainant

Sworn to and subscribed before me this ~~28th~~ 26 day of ~~April~~ March, 20 23

He/she is personally known __ or has produced ✓ driver's license, as identification.

Signature of notary

EGLARINE HARRISON
Notary Public - State of Florida
Commission # HH146993
Expires on October 11, 2025

Eglarine Harrison — Printed name of notary

HH146993 — FL ~~La.~~ Notary ID#

Notarized online using audio-video communication

Notice of Lack of Jurisdiction and Divestiture Confirmation

Plaintiff submits this Notice to confirm that the Court was divested of jurisdiction on December 3 2024 upon the granting of a devolutive appeal pursuant to Louisiana Code of Civil Procedure article 2088. From that date forward the Court lacked authority to issue orders conduct hearings impose costs generate service attempts rescind pauper status or issue contempt citations. All actions taken after divestiture are void ab initio.

The Court nevertheless conducted hearings on December 18 and December 30 2024 generating additional costs service returns and contempt related entries. These actions were taken without authority and are null. Plaintiff submits this Notice to ensure that no post divestiture fees orders or actions are enforced now or in the future.

Notice of Lack of Jurisdiction and Divestiture Confirmation

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NOTICE OF APPEAL
CIVIL CASE

JOHN CLIFFORD J KING

VS.

RENEE AMOS NOTARY PUBLIC
NOTARY ID# 29374

JAMIS Control No. _____

Case No. 23-2124

Parish of CALCASIEU

State of LOUISIANA

TO: OLIVER SCHRUMPF
SCHRUMPF LAW OFFICE, APLC
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

Division CIVIL

RONALD C. RICHARD
Presiding Judge

REBECCA BERKEN/KAREY BANG
Court Reporter

TWO HOURS (2)
Estimated Hours of Testimony Taken

NOTICE is hereby given that on DECEMBER 2, 2024 upon motion of JOHN CLIFFORD J KING, PLAINTIFF (Give appellant's proper name and designate whether he or she is plaintiff, defendant, or intervenor, etc.), an order of appeal was entered on DECEMBER 3, 2024, granting an appeal from judgment of NOVEMBER 14, 2024, returnable to the COURT OF APPEAL, 3rd Circuit, 45 days from when costs are paid.

The appeal taken was:

[ ] Suspensive Bond $_____ [ ] In Forma Pauperis

According to Law_____

[X] Devolutive Bond set at $_____ [ ] Act La. R.S. 13:4521 & 13:4581

I certify that the foregoing notice was this day mailed by me in accordance with Article 2121, La. C.C.P.

LAKE CHARLES, Louisiana, this the 20TH day of DECEMBER, 2024.

Karey Bang
DEPUTY CLERK OF COURT

ATTENTION: Under Article 2126, La. C.C.P., all estimated costs of the appeal must be paid to the Clerk within 20 days.

EXTENSION OF RETURN DAY GRANTED BY THE TRIAL COURT

The return day was extended from _____, _____, to _____, _____

Order Signed by _____ Date Signed: _____

Reason for Extension:_____

I certify that the foregoing extension notice was this day mailed by me in accordance with Article 2125, La. C.C.P., _____, Louisiana, this the _____ day of _____, _____

_____
DEPUTY CLERK OF COURT

October 19
12:39 PM
All Photos



JOHN CLIFFORD JOSEPH KING, SR.	:	14TH JUDICIAL DISTRICT COURT
VS. NO. 2021-002773, DIV. A	:	PARISH OF CALCASIEU
CHARMAINE COLSTON	:	STATE OF LOUISIANA
FILED: AUG 13 2021	:	DEPUTY CLERK

ORDER

The foregoing petition, prayer, affidavit, and premises considered:

IT IS ORDERED that the Defendant, CHARMAINE COLSTON, be served with a certified copy of this Petition with notice and citation.

IT IS FURTHER ORDERED that a Temporary Restraining Order is issued herein, without notice and without bond, restraining and enjoining CHARMAINE COLSTON from unnecessarily disturbing, harassing, stalking, or threatening JOHN CLIFFORD JOSEPH KING, SR. in any manner whatsoever, including, but not limited to, telephonic and electronic communications- such as text, email, and social media messaging.

IT IS FURTHER ORDERED that the Defendant, CHARMAINE COLSTON, appear before the Hearing Officer of this Honorable Court on the 4th day of October, 2021, at 9 o'clock A.M and show cause why: Via Zoom with Tom Shea.

A. The parties should not be awarded joint custody of the minor children, with Defendant being designated as the domiciliary parent and Petitioner having reasonable visitation, including the option to exercise additional visitation in Lake Charles during extended school holiday weekends pursuant to the Calcasieu Parish School Calendar and one week for vacation during the summer, all in accordance with the attached suggested Joint Custody Plan;

B. Petitioner should not be ordered to pay child support in an amount consistent with the Louisiana Child Support Guidelines, pursuant to Revised Statute 9:315 et seq.;

C. Petitioner should not be granted permission to claim the children as dependents for State and Federal income tax purposes every year; and

D. A preliminary injunction and, in due course, a permanent injunction, should not be issued enjoining and restraining CHARMAINE COLSTON, and her agents, from unnecessarily disturbing, harassing, stalking, or threatening JOHN CLIFFORD JOSEPH KING, SR. in any manner whatsoever, including, but not limited to, telephonic and electronic communications- such as text, email, and social media messaging.

THUS DONE AND SIGNED this 19th day of August, 2021 at Lake Charles, Louisiana.

JUDGE, 14TH JUDICIAL DISTRICT COURT

W. Mitchell Redd

CAL CLERK-FAMILY COUR
AUG 13 2021 PM3:00:55

CMS7820303
Filing Date: 08/13/2021 02:59 PM
Case Number: 2021-002773
Document Name: ORDER
Page Count: 1

Physical Medicine and Rehabilitation
Occupational/Musculoskeletal Medicine
EMG and Nerve Conduction Studies
Fluoroscopic-Guided Injection Procedures
Independent Medical Exams (IMEs)
Musculoskeletal Ultrasound
Pain Management
Sports Medicine

NEW JERSEY MEDICAL SCHOOL
DOCTORS OFFICE CENTER

New Jersey Medical School
University Rehabilitation Associates
90 Bergen Street, D.O.C. Suite 3100
Newark, N.J. 07103-2499
Tel: 973-972-2802
Fax: 973-972-2825

Consultation Request

Patient: King, John
Date: 4-3-24
To: Susan Szapiel MD (973-877-5080), (973-877-5158)

Reason for consultation:

36-year-old male with recurrent falls of unclear origin along with possible cognitive dysfunction (neurology evaluation for this is pending in 7/24). Please assess for possible balance dysfunction.

electronically signed after review

Todd P. Stitik MD
Professor of PM&R, Rutgers-New Jersey Medical School

Phone: 973-972-2802 stitikto@njms.rutgers.edu

Response: (Please either write response/results here or send a separate report to my office.)

RUTGERS
New Jersey Medical School

Physical Medicine and Rehabilitation
University Rehabilitation Associates
New Jersey Medical School
Doctors Office Center, Suite 3100
Rutgers, The State University of New Jersey
90 Bergen Street Newark, NJ 07103

Musculoskeletal Medicine
Pain Management
Work Injuries
Musculoskeletal Ultrasound
Coccyx Pain Center
Phone: 973-972-2802
Fax: 973-972-2825

WORK RETURN STATEMENT

Today's Date: 4 -- 3 - 2024

To:

Date of Injury: 4 -- _____ - 2021

☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313

☐ The patient's **Supervisor**.

☐ Other (specify):

Patient Name: John King was seen (_____ AM/ PM until ____ AM/ PM) today in the Physical Medicine and Rehabilitation department (DOC-3100).
Or: ☐ The patient was seen in the office on the following date: _____ -- _____ - 201___

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ **Return to *FULL* duty on** _____--_____-- 201____.

☒ **MODIFIED duty** starting on 4 -- 3 -- 2024. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:
- ☐ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
- ☐ No overhead activities.
- ☒ Other: No crawling, climbing. only stand for limited lengths of time. Cannot fly

☒ ***Kept Out-of-Work*** from 4 -- 3 -- 2024 until & including 7 -- 15 -- 2024
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ ***After*** this date: the patient is then medically **cleared** (as of the following day) to return to:
- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☐ **FOLLOW-UP HERE** is scheduled _____--_____--201___, or in ____ week(s).

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.
If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD
Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

Todd Stitik, MD

Other:

Revised 9-16-14

Notice of Subpoena

November 4, 2024

VIA E-MAIL:
Kamie T. Dominic, Esq.
Attorney for Renee Amos / The Hartford
Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

John Clifford Joseph King, Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601

Re: John Clifford King, Sr. vs. Renee Amos / The Hartford
State of Louisiana, No. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

Dear Ms. Dominic,

Pursuant to the Louisiana Code of Civil Procedure and applicable evidentiary statutes, this letter serves as formal notice of intent to issue subpoenas for the production of all electronic mail (including the complete content of email bodies, attachments, and any relevant written correspondence) relating to Calcasieu Parish Case Nos. 23-2124 and 2021-2773. This subpoenaed information is sought on behalf of John Clifford King, Sr., and pertains specifically to correspondence with or directed to the following individuals:

- Scott Hawkins, Esq, and Scott Hawkins and Associates
- Mark Judson, Executive Director, Southwest Louisiana Law Association
- Lakoshia Roberts, Esq., Southwest Louisiana Law Association Inc.
- Dustan J. Abshire, Esq., Abshire and Associates

Please find attached the **Notice of Production Only Subpoena** in relation to this request.

In accordance with La. Code Civ. Proc. arts. 1354 and 1355, please advise within seven (7) days from the date of this notice if there is any opposition to this subpoena. Additionally, given the recent procedural issues surrounding the filing of your motions on October 31, 2024, with service effected via “courtesy

copy" on November 1, 2024, in lieu of the mandated procedural timeline, I respectfully request a waiver of the seven-day objection period. The motions filed included, but were not limited to, Motions for Sanctions, motions concerning witness and evidence exclusion, and allegations of misconduct. All subpoenaed communications are critical to refuting these motions and supporting the position of the Plaintiff in the above-referenced cases.

I appreciate your timely attention to this matter. Please notify me at your earliest convenience if you consent to waive the objection period, or if you will require the full seven-day timeframe.

With kind regards, I remain,

Sincerely,

John Clifford J. King, Sr.
Pro Se Litigant
truekingfile@gmail.com

CC: File

Kent Castille <kcastille@cpso.com> Thu, Jul 28, 2022 at 9:59 AM
To: John King <johncjking86@gmail.com>

The case had been submitted to the District Attorney's Office for review. I am currently waiting for their decision.

From: John King <johncjking86@gmail.com>
Sent: Tuesday, July 26, 2022 4:15 PM
To: Kent Castille <kcastille@CPSO.COM>
Subject: Re: Insurance case [EXT]

Good Evening Mr Castillle,

It is now almost august and I haven't heard any updates.

State Farm admitted to wrong doing on one policy and reissued it back to my ownership as Charmaine forged the transfer and this was proven.

The second policy is still being investigated.

5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.

Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail



Gmail **True King <truekingfile@gmail.com>**

Fwd: Harris County Lab

4 messages

The Kings <fit4thekings@gmail.com> Thu, Nov 14, 2024 at 9:07 AM
To: truekingfile@gmail.com

---------- Forwarded message ---------
From: **Tay Jones** <msjonesbeaty@gmail.com>
Date: Thu, Nov 14, 2024 at 6:41 AM
Subject: Fwd: Harris County Lab
To: <fit4thekings@gmail.com>

---------- Forwarded message ---------
From: **Janet Barcelona** <JBarcelona@tomballtx.gov>
Date: Mon, Oct 1, 2018 at 4:49 PM
Subject: Harris County Lab
To: msjonesbeaty@gmail.com <msjonesbeaty@gmail.com>

The Harris County lab just called me back and they prefer to have a Buccal Swab from you to go with the bullet to the lab. So I will submit it on Friday this week.

Janet Barcelona

Property & Evidence Tech

Crime Scene Investigations

Tomball Police Department

Ph: (Direct) 281-290-1339

Fax: 281-351-2615

True King <truekingfile@gmail.com> Thu, Nov 14, 2024 at 9:09 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, True King <truekingfile@gmail.com>

Mrs King Protected crime victim off the record .
[Quoted text hidden]

True King <truekingfile@gmail.com> Thu, Nov 14, 2024 at 9:12 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, True King <truekingfile@gmail.com>

Address for crime victims services
[Quoted text hidden]

True King <truekingfile@gmail.com> Thu, Nov 14, 2024 at 9:38 AM
Draft To: True King <truekingfile@gmail.com>, Oliver Schrumpf <oschrumpf@schrumpf-law.com>

Crime scene investigations case has not been finalized .
[Quoted text hidden]

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601
  kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant’s Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis

I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant's **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), "excited utterance"**, and **La. C.E. Art. 803(3), "then-existing mental, emotional, or physical condition"**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses' statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant's claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Case # 23-2124
King Vs Amos The Hartford

Motions Continuance DismissQuash
10/31/2024

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the 31st day of October, 2024, at 6:58 o'clock AM/PM, Lake Charles, Louisiana.

5/31/24

signature

STATE OF LOUISIANA

Case # 23-2124 Motions Continuance DismissQuash
King Vs Amos The Hartford 10/31/2024

PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared **John CJ King Sr.**, who, after being duly sworn, did depose and say:

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical



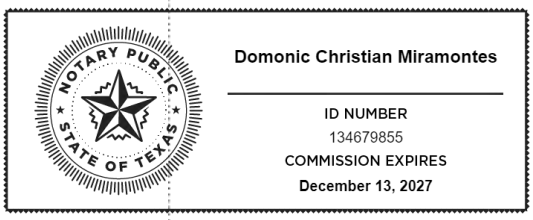
_____

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 10/31/2024

Number of Pages (including notarial certificate): 7



State of Texas

County of Bexar

This instrument was acknowledged before me by means of an interactive two-way audio and video communication on 10/31/2024 by John Clifford King.

EMERGENCY REQUEST FOR FEDERAL COURT CLERK

S J K
P.O. Box 12198
c/o L. Shunte Jones
Austin, TX 78711 2198
Email: kingshunte@gmail.com
Date: _____

Clerk of Court
U.S. District Court
Western District of Louisiana
Lake Charles Division
(337) 437 3871

Re: Request for Emergency Fax/Email Filing Authorization Under Local Rule 5.7.08

To the Clerk of Court:

I respectfully request emergency authorization to file my civil rights complaint today by fax or email, pursuant to Local Rule 5.7.08, due to urgent safety concerns and an expiring filing deadline.

I am proceeding pro se and under a pseudonym (S J K) because I am a documented crime victim enrolled in the Texas Attorney General Address Confidentiality Program (ACP). I cannot safely travel to Louisiana or appear in person, and disclosure of my physical location presents a direct and ongoing threat to my safety.

My filing is an emergency civil complaint under 42 U.S.C. 1983, seeking declaratory and injunctive relief against a Louisiana judicial officer involving continued retaliation, due process violations, and conduct that places me at risk of further harm. The circumstances require immediate filing today to preserve my rights and avoid irreparable injury.

Because I am pro se, I do not have CM/ECF access and cannot electronically file through the attorney portal. Under the circumstances, fax or email submission is the only safe, immediate, and feasible method available to me by today deadline.

Please note the following:

1. The original wet signed complaint, civil cover sheet, motions, and exhibits have been mailed to the Clerk Office, but will not arrive in time to satisfy today filing deadline.
2. A money order for the filing fee is being mailed separately, along with a wet signed copy of all filings.
3. I respectfully request that the Court accept my faxed or emailed filings today, with the understanding that the originals and payment are already en route.

Given my ACP status, safety considerations, and the emergency nature of this filing, I respectfully request immediate authorization to transmit my complaint package today by fax or secure email, with the assurance that the originals will follow by mail as required.

Thank you for your time, understanding, and assistance in ensuring my safety while preserving my right of access to the Court.

Respectfully,

S J K
Pro Se
Texas ACP Crime Victim
Email: kingshunte@gmail.com

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K et al
Plaintiffs

v

Hon Ronald C Richard et al
Defendants

FIRST AMENDED CIVIL RIGHTS COMPLAINT UNDER 42 U S C 1983

Submitted by
S J K and et al Plaintiffs proceeding under pseudonyms for safety and confidentiality

Date
November 10 2025

Filed in the

United States District Court

Western District of Louisiana

Lake Charles Division

MOTION TO PROCEED UNDER PSEUDONYM

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

MOTION TO PROCEED UNDER PSEUDONYM
AND TO FILE SERVICE ADDRESS UNDER SEAL

NOW COME Plaintiffs S J K and J K by and through themselves and respectfully move this Honorable Court for leave to proceed under pseudonyms and to file their service address under seal and as grounds state as follows

Plaintiffs are the victims of long term organized harassment impersonation identity theft cyber intrusion mail interception and threats which culminated in a violent home intrusion on December 11 2024.

II Plaintiff S J K is enrolled in the Texas Attorney General Crime Victims Program. The purpose of this program is to protect the confidentiality and safety of crime victims whose lives remain at risk.

III Plaintiffs have alleged that certain court officials and parish actors in Calcasieu Parish disclosed confidential information about Plaintiff S J K including her address despite warnings that such disclosure would place her at risk of serious harm.

IV Three weeks after Plaintiff S J K sought to protect her information a deadly home intrusion occurred at her family residence as described in the First Amended Civil Rights Complaint.

V Plaintiffs continue to experience digital surveillance cyberbanking interference Google Timeline tracking and threats connected to the events described in the Complaint.

VI Disclosure of Plaintiffs full names and current address in public filings would place them at grave risk of further physical harm stalking retaliation and harassment and would undermine the protections provided by the Texas Attorney General Crime Victims Program.

VII Federal courts have inherent authority to permit pseudonym filings and sealed addresses where a litigant's safety would be seriously endangered by disclosure of identifying information and where specific evidence of danger exists.

VIII Plaintiffs request permission to proceed under pseudonyms and to file their service address under seal to be available to the Clerk and to Defendants counsel pursuant to further order of this Court.

WHEREFORE Plaintiffs respectfully request that this Court

A Grant Plaintiffs leave to proceed under pseudonyms S J K and J K
B Authorize Plaintiffs to file their service address under seal with the Clerk
C Direct that Plaintiffs names and service address not appear in any public docket entry and
D Grant such other and further relief as the Court deems just and proper.

Respectfully submitted

Dated November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

AFFIDAVIT OF S J K

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

AFFIDAVIT OF S J K

I I am the Plaintiff identified in this case as S J K and I submit this affidavit in support of my First Amended Civil Rights Complaint and related motions.

II I am a protected crime victim enrolled in the Texas Attorney General Crime Victims Program. I have previously experienced attempts on my life and repeated stalking and harassment.

III I have personal knowledge of the facts stated in the First Amended Civil Rights Complaint except where statements are expressly based on information and belief. As to those matters I believe them to be true based on documents, records and communications in my possession.

IV I affirm that the events described in the Complaint including but not limited to unlawful detention in Lake Charles City Court denial of medical accommodations threats of contempt and jail fabricated service attempts suppression of filings interference with counsel denial of restraining orders refusal to investigate impersonation exposure of confidential victim information and the December 11 2024 home intrusion occurred thereafter substantially as alleged resulting in the shooting of intruder..

V I further affirm that the impersonation identity theft digital stalking cyberbanking interference mail interception and Google Timeline tracking described in the Complaint have occurred and are documented in records messages or other evidence that I am prepared to provide to the Court as needed.

VI I make this affidavit under penalty of perjury pursuant to 28 U S C section 1746.

Executed on November 10 2025
Location withheld for safety

S J K
Electronically signed
Plaintiff under pseudonym

MOTION FOR TRO AND PRELIMINARY INJUNCTION

MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

NOW COME Plaintiffs S J K and J K and move this Court for a temporary restraining order and preliminary injunction and in support state

I Plaintiffs incorporate all factual allegations of the First Amended Civil Rights Complaint.

II Plaintiffs face ongoing danger of retaliation, stalking, impersonation, digital intrusion and misuse of their personal information by or through Defendants in Calcasieu Parish.

III Plaintiffs have alleged that Defendants exposed confidential crime victim information and that within weeks a violent home intrusion occurred on December 11 2024 resulting in a death.

IV Plaintiffs further allege that Defendants continue to

A ignore impersonation and identity theft & slander & conspiracy
B suppress filings
C fabricate addresses
D threaten contempt and jail
E maintain unclear and ongoing proceedings in parish courts

V Plaintiffs are likely to succeed on the merits of their constitutional claims including violations of the First Fourth Ninth and Fourteenth Amendments and Monell claims against municipal entities.

VI Plaintiffs face irreparable harm in the form of further physical danger, emotional trauma, loss of parental rights and denial of access to the courts if relief is not granted.

VII The balance of equities favors Plaintiffs because the requested relief only requires Defendants to follow the law to protect crime victims, cease retaliation and refrain from using fabricated records.

VIII The public interest is served by protecting constitutional rights, ensuring integrity in judicial proceedings and ensuring that crime victims are not retraumatized by disclosure of confidential data.

WHEREFORE Plaintiffs respectfully request that this Court

A Issue a temporary restraining order prohibiting Defendants and their agents from
retaliating against Plaintiffs
disclosing Plaintiffs confidential identifying information
using fabricated addresses or service entries
and continuing any proceedings against Plaintiffs without clear jurisdiction and notice

B Set this matter for a hearing on preliminary injunction at the earliest practicable time and permit appearance of plaintiff by zoom for victims protection form further harm.

C After hearing issue a preliminary injunction continuing the protections requested above and

D Grant such other equitable relief as the Court deems just and proper.

Dated November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAKE CHARLES DIVISION

S J K under pseudonym

and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

ORDER REGARDING FIRST AMENDED CIVIL RIGHTS COMPLAINT

Before the Court is Plaintiffs First Amended Civil Rights Complaint filed pursuant to 42 U S C section 1983 seeking declaratory and injunctive relief against the above named Defendants.

The Court having considered the filing its accompanying affidavits and motions and recognizing that Plaintiffs proceed under pseudonyms for safety and confidentiality

IT IS ORDERED that the First Amended Civil Rights Complaint is hereby FILED into the record of this Court.

IT IS FURTHER ORDERED that Defendants shall file an answer or other responsive pleading within the time prescribed by the Federal Rules of Civil Procedure.

IT IS FURTHER ORDERED that the Clerk of Court shall ensure that Plaintiffs pseudonyms be used in all publicly accessible docket entries pending further order of this Court.

IT IS FURTHER ORDERED that Plaintiffs service address shall remain under seal pending the Courts ruling on the Motion to Proceed Under Pseudonym.

IT IS FURTHER ORDERED that this matter is referred to the assigned United States Magistrate Judge for further case management consistent with the Federal Rules of Civil Procedure and local rules of this Court.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

_____

UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____
Judge _____
Magistrate Judge _____

FIRST AMENDED CIVIL RIGHTS COMPLAINT
Filed Under Pseudonym For Safety And Confidentiality

I PARTIES

1 Plaintiff S J K is a United States citizen who proceeds under pseudonym due to active threats to her safety and confidentiality as a protected crime victim enrolled in the Texas Attorney General Crime Victims Program.

2 Plaintiff J K is the spouse of Plaintiff S J K and proceeds under pseudonym to protect the confidential identity and location of Plaintiff S J K.

3 Defendant Hon Ronald C Richard is the presiding judge of Lake Charles City Court Ward 3 and is sued in his official capacity for declaratory and injunctive relief only.

4 Defendant City of Lake Charles is responsible for the funding oversight and operation of Lake Charles City Court including personnel policies and court practices.

5 Defendant Lake Charles City Court Ward 3 is a municipal judicial entity responsible for courtroom procedures recordkeeping and actions undertaken by its judges, clerks and staff.

6 Defendant Calcasieu Parish Police Jury is the governing authority of Calcasieu Parish responsible for parish policies, supervision funding of parish departments and oversight of parish level judicial administrative and law enforcement functions.

7 Defendant Calcasieu Parish Clerk of Court is responsible for filing procedures docketing record management access to filings issuance of certified copies and handling of public court business.

8 Defendant Calcasieu Parish Sheriff is responsible for law enforcement service of process criminal investigation and protection of parish residents including crime victims.

9 Defendant Calcasieu Parish District Attorney is responsible for criminal prosecution, receipt of criminal complaints, investigation of impersonation fraud and review of criminal allegations affecting citizens.

10 Defendant Fourteenth Judicial District Court of Louisiana is responsible for family court criminal court and civil court adjudications including hearings restraining order determinations and judicial conduct.

11 Defendant Calcasieu Parish District Court Administrator oversees court administration scheduling judicial support staffing and compliance with judicial policies.

II JURISDICTION

12 This Court has jurisdiction under 28 U S C section 1331 and 28 U S C section 1343 because this action arises under the Constitution and laws of the United States including 42 U S C section 1983.

13 Declaratory and injunctive relief are authorized by 28 U S C sections 2201 and 2202.

14 Plaintiffs seek only prospective equitable and structural relief from judicial and official capacity defendants.

III VENUE

15 Venue is proper in the Western District of Louisiana under 28 U S C section 1391 because all events giving rise to this civil rights action occurred in Calcasieu Parish, Louisiana.

IV INTRODUCTION

16 This lawsuit arises from a sustained pattern of coordinated constitutional violations by Lake Charles City Court Calcasieu Parish government officials parish courts sheriff personnel district attorney personnel clerks magistrates and administrative officers.

17 Plaintiffs allege violations of the First Fourth Ninth and Fourteenth Amendments including unlawful detention suppression of filings deprivation of due process equal protection violations exposure of confidential crime victim information refusal to investigate crimes impersonation stalking identity theft and threats culminating in a violent home intrusion.

18 Plaintiffs seek declaratory injunctive and structural relief to stop ongoing retaliation, protect their rights and ensure future proceedings comply with the Constitution.

V FACTUAL ALLEGATIONS

Part 1 Lake Charles City Court and Judge Richard

19 Plaintiff J K filed a small claims case in August 2023 regarding a stolen automobile. Plaintiff S J K was not a party and had never filed any pleading in the case.

20 The case was reassigned internally to Judge Ronald C Richard without notice providing him full control over proceedings.

21 Plaintiff S J K had no involvement in the case and had never appeared, communicated or filed anything in Lake Charles City Court prior to Judge Richard inserting her name into the record.

22 Plaintiffs allege Judge Richard exerted jurisdiction over Plaintiff S J K without service without cause and without lawful authority.

23 Plaintiffs allege Judge Richard falsely accused Plaintiff S J K of practicing law although she had filed nothing and Plaintiff J K had used lawful document preparers.

24 Plaintiffs allege this accusation was retaliatory for Plaintiffs questioning the conduct of court clerks and the handling of filings.

25 At the time of these accusations Plaintiff S J K was in New Jersey caring for her spouse who had been hospitalized and temporarily paralyzed due to spinal cord injury.

VI MEDICAL CRISIS AND UNLAWFUL DETENTION

26 Plaintiffs allege medical records showed that travel created risk of permanent spinal injury for Plaintiff J K yet Judge Richard denied continuances and threatened jail for failure to appear.

27 Plaintiffs allege Plaintiff J K collapsed on the courtroom floor during the November 14 2024 hearing and was denied medical care.

28 Plaintiffs allege Judge Richard ordered court officers to lock the courtroom doors preventing Plaintiffs from leaving for medication or assistance.

29 Plaintiffs allege this constituted unlawful seizure and deliberate indifference to a serious medical need.

VII FAVORITISM AND RACIAL DISCRIMINATION

30 Plaintiffs allege Judge Richard told former counsel he did not want the opposing party held responsible because she lacked means and was acquainted with court staff.

31 Plaintiffs allege the opposing party was Caucasian and received favorable unlawful treatment while Plaintiffs who are Black received hostility, retaliation and unequal treatment.

32 Plaintiffs allege this establishes discriminatory motive in violation of the Fourteenth Amendment.

VIII FABRICATED ADDRESSES AND FALSE SERVICE ATTEMPTS

33 Plaintiffs allege Lake Charles City Court staff created fabricated addresses in Iowa Louisiana and falsely recorded service attempts at these locations.

34 Plaintiffs allege Plaintiffs have never lived in Iowa Louisiana and never provided any address in Iowa Louisiana to any court.

35 Plaintiffs allege fabricated service entries were used to increase court costs, create false records and justify adverse rulings.

36 Plaintiffs allege fabricated service continued even after Plaintiffs alerted the court in writing and through appeals.

IX EX PARTE COMMUNICATIONS BLOCKING COUNSEL

37 Plaintiffs allege several attorneys reported that Lake Charles City Court staff warned them not to enroll because Judge Richard would retaliate.

38 Plaintiffs allege at least four attorneys communicated they were discouraged from enrolling due to off record interference by court staff.

39 Plaintiffs allege such interference deprived Plaintiffs of their right to counsel.

40 Plaintiffs allege former counsel withdrew after repeated intimidation by Lake Charles City Court staff.

41 Plaintiffs allege Judge Richard retaliated further after learning Plaintiffs had consulted additional attorneys.

X SUPPRESSION OF FILINGS

42 Plaintiffs allege Lake Charles City Court clerks suppressed filings including motions for continuance emergency medical documentation and objections to improper rulings.

43 Plaintiffs allege motions were withheld mislabeled or refused without lawful basis.

44 Plaintiffs allege these actions denied fair process and access to the court.

XI RETALIATION BY JUDGE RICHARD

45 Plaintiffs allege Judge Richard retaliated against Plaintiffs by escalating threats, accusations and invented charges after Plaintiffs raised concerns about court staff misconduct.

46 Plaintiffs allege Plaintiff J K was threatened with jail if he did not retract truthful statements made regarding the Spring 2024 chamber hearing where Judge Richard stated he did not want the opposing party punished.

47 Plaintiffs allege Plaintiff J K refused to recant and Judge Richard increased retaliation as a result.

XII APPEAL INTERFERENCE AND FALSE STATEMENTS

48 Plaintiffs allege after Plaintiff J K filed an appeal Judge Richard unlawfully continued issuing orders including increasing fees forcing counsel to appear and creating new contempt accusations.

49 Plaintiffs allege Judge Richard made false statements to the Louisiana Third Circuit about Plaintiffs including denying the December 11 home intrusion occurred.

50 Plaintiffs allege such actions obstructed appellate oversight and distorted the record.

XIII FOURTEENTH JUDICIAL DISTRICT COURT MISCONDUCT

A Denial of Restraining Orders and Forced False Statements

51 Plaintiffs allege a Fourteenth Judicial District Court judge denied lawful restraining orders requested by Plaintiff J K despite clear evidence of threats, impersonation and harassment.

52 Plaintiffs allege the judge forced Plaintiff J K to swear to statements the judge knew were false including a statement that Plaintiffs could not obtain restraining orders anywhere in the United States.

53 Plaintiffs allege such statements exceeded the judge’s authority and violated constitutional rights.

B Untimely Filings Accepted Against Plaintiffs

54 Plaintiffs allege the Fourteenth Judicial District Court accepted untimely filings from opposing individuals without requiring compliance with procedural rules.

55 Plaintiffs allege Plaintiffs motions were denied or ignored despite being properly submitted.

56 Plaintiffs allege this unequal treatment demonstrates discriminatory motive and denial of due process.

C Trial With No Charges Stated

57 Plaintiffs allege Plaintiff J K was repeatedly placed on trial with no statement of charges, issues or claims being adjudicated.

58 Plaintiffs allege Plaintiff J K requested clarification in writing and orally and the court refused to identify any basis for the hearings.

59 Plaintiffs allege such refusal prevented Plaintiff from securing counsel or preparing any defense.

D Use of Criminal Allegations in Family Court Without Charges

60 Plaintiffs allege parish judges inserted criminal allegations into family court orders without any criminal process.

61 Plaintiffs allege such actions were unconstitutional and resulted in family separation and ongoing harm.

E Ex Parte Communications by Parish Clerks

62 Plaintiffs allege Fourteenth Judicial District Court clerks engaged in ex parte communication with opposing individuals including those hostile to Plaintiffs.

63 Plaintiffs allege clerks withheld filings, transcripts and orders from Plaintiffs while distributing information to others.

64 Plaintiffs allege these clerks acted with bias and participated in coordinated retaliation.

F Refusal to Enforce Court Orders Favorable to Plaintiffs

65 Plaintiffs allege the Fourteenth Judicial District Court refused to enforce its own orders when enforcement would protect Plaintiffs.

66 Plaintiffs allege the court selectively enforced only those orders that harmed Plaintiffs.

XIV CALCASIEU PARISH SHERIFF FAILURE TO PROTECT

67 Plaintiffs allege the Sheriff’s Office refused to investigate impersonation stalking threats and identity theft despite repeated reports.

68 Plaintiffs allege deputies refused to interview identified suspects even when Plaintiffs provided evidence including photographs, videos , messages and witness statements.

69 Plaintiffs allege the Sheriff's Office made false legal statements including that anybody can get a life insurance policy on anybody causing additional fear given the context of threats.

70 Plaintiffs allege the Sheriff's Office failed to classify incidents properly, failed to file reports and failed to follow investigatory procedure.

XV DISTRICT ATTORNEY FAILURE TO INVESTIGATE IMPERSONATION

71 Plaintiffs allege the District Attorney and Assistant District Attorneys were provided clear evidence of impersonation and ongoing criminal violations yet refused to investigate.

72 Plaintiffs allege the ADA Office made no attempts to identify or question the impersonator.

73 Plaintiffs allege such refusal to act allowed impersonation to continue harming Plaintiffs across states.

XVI DECEMBER 11 2024 HOME INVASION CAUSED BY DEFENDANTS

74 Plaintiffs allege that on December 11 2024 an intruder entered Plaintiffs home placing their lives in immediate danger.

75 Plaintiffs allege the intrusion occurred after Defendants exposed Plaintiff S J K's confidential address despite warnings that disclosure endangered her life.

76 Plaintiffs allege Defendants maliciously disclosed the address withdrawing protections guaranteed to a crime victim.

77 Plaintiffs allege the intrusion caused permanent trauma including inability to travel to Louisiana and continuous fear.

XVII CYBER INTRUSION MAIL INTERCEPTION AND DIGITAL TRACKING

78 Plaintiffs allege Defendants ignored evidence that Plaintiffs were subjected to cyberbanking interference, illegal text forwarding hacking of USPS mail tracking Google Timeline surveillance and continuous digital monitoring.

79 Plaintiffs allege court officers concealed evidence of such stalking and used illegally obtained data to intimidate Plaintiffs.

80 Plaintiffs allege these acts constitute unlawful intrusion and state created danger.

XVIII SUPERVISORY WRIT RULING IN PLAINTIFFS FAVOR

81 Plaintiffs allege the Louisiana Third Circuit Court of Appeal granted a supervisory writ on February 6 2025 confirming Judge Richard had been divested of jurisdiction and all actions after Plaintiffs appeal were void.

82 Plaintiffs allege the appellate ruling confirmed misconduct and disregard for jurisdictional limits.

XIX CONTINUING RETALIATION AND COORDINATED HARASSMENT

83 Plaintiffs allege that beginning in 2022 and continuing through 2025 they experienced coordinated retaliation across multiple Calcasieu Parish agencies including courts clerks, sheriff deputies, district attorney staff and city court officials.

84 Plaintiffs allege multiple county and parish employees communicated off record about Plaintiffs cases as confirmed by an officer of the court who admitted in January 2025 that every judge in the county knows now indicating widespread ex parte discussion.

85 Plaintiffs allege this coordination resulted in harassment, stalking , denial of access to justice, manipulation of filings and suppression of evidence.

86 Plaintiffs allege these acts occurred after Plaintiffs sought justice regarding a stolen automobile and after Plaintiffs reported impersonation fraud and criminal interference.

XX FALSE CRIMINALIZATION OF PLAINTIFFS

87 Plaintiffs allege Judge Richard fabricated a contempt charge against Plaintiff S J K several days after a hearing to intimidate her and deter her from testifying on behalf of her spouse.

88 Plaintiffs allege Plaintiff S J K had never appeared in court, never filed anything in the case and had no notice of any alleged violation.

89 Plaintiffs allege Plaintiff S J K was accused without evidence of practicing law despite having never signed or submitted any pleadings in Lake Charles City Court.

90 Plaintiffs allege these unlawful accusations were made solely to harm and silence her.

XXI MISUSE OF AUTHORITY TO INFLICT PERSONAL HARM

91 Plaintiffs allege Judge Richard repeatedly stated his intent to teach them a lesson and threatened jail without lawful grounds.

92 Plaintiffs allege Judge Richard blocked the courtroom exit on November 14 2024 and refused to allow Plaintiffs to leave to seek medication or assistance.

93 Plaintiffs allege this was a knowing violation of Plaintiffs Fourth and Fourteenth Amendment rights.

XXII DELIBERATE INDIFFERENCE TO MEDICAL NEEDS

94 Plaintiffs allege Plaintiff J K was in medical crisis during the November 14 2024 hearing visibly collapsing exhibiting symptoms of spinal nerve compression seizure like inability to stand or walk.

95 Plaintiffs allege Judge Richard ignored these medical emergencies, refused medication breaks and proceeded with hearing while Plaintiff lay on the floor.

96 Plaintiffs allege these actions caused lasting harm and increased spinal damage.

XXIII DENIAL OF RIGHT TO TESTIFY AND PRESENT EVIDENCE

97 Plaintiffs allege Judge Richard refused to permit Plaintiff J K to testify in his own defense.

98 Plaintiffs allege Judge Richard allowed opposing counsel to submit unauthenticated print outs while refusing to admit Plaintiffs evidence even when originals were provided.

99 Plaintiffs allege this deprived Plaintiffs of due process and equal protection.

XXIV IMPROPER INVOLVEMENT OF OUTSIDE INDIVIDUALS

100 Plaintiffs allege several unrelated attorneys and court officers appeared inside closed proceedings despite not representing any party.

101 Plaintiffs allege one individual was the attorney for a person who had previously harassed Plaintiffs and was permitted to sit in the courtroom though the public had been cleared.

102 Plaintiffs allege these appearances were intimidating and violated procedural rules.

XXV IMPACT OF DEFENDANTS ACTIONS ON PLAINTIFFS LIVES

103 Plaintiffs allege Defendants conduct caused ongoing trauma, severe emotional distress, inability to travel to Louisiana, loss of parental rights, loss of financial security, professional harm and continual fear for personal safety.

104 Plaintiffs allege the home intrusion on December 11 2024 was the foreseeable result of Defendants exposing confidential victim information.

105 Plaintiffs allege the intrusion permanently affected their ability to sleep, work , travel or feel safe and remains a source of terror.

106 Plaintiffs allege Defendants refusal to act on identity theft allowed impersonators to continue attacking Plaintiffs credit records, financial accounts, mail and employment.

XXVI CAUSES OF ACTION

COUNT 1
VIOLATION OF FOURTEENTH AMENDMENT PROCEDURAL DUE PROCESS

107 Plaintiffs incorporate all prior paragraphs.

108 Defendants deprived Plaintiffs of notice service opportunity to be heard and fair procedure.

109 Plaintiffs were placed on trial without charges, denied counsel, denied access to filings and given fabricated addresses.

110 These actions violated the Fourteenth Amendment.

COUNT 2
FOURTEENTH AMENDMENT EQUAL PROTECTION VIOLATIONS

111 Plaintiffs incorporate all prior paragraphs.

112 Plaintiffs were treated less favorably than similarly situated parties including the opposing party who received repeated procedural leniency.

113 Plaintiffs allege discrimination based on race and animus.

COUNT 3
FOURTH AMENDMENT UNLAWFUL DETENTION

114 Plaintiffs incorporate all prior paragraphs.

115 Judge Richard locked Plaintiffs in the courtroom preventing medical access constituting an unreasonable seizure.

COUNT 4
FIRST AMENDMENT RETALIATION

116 Plaintiffs incorporate all prior paragraphs.

117 Plaintiffs exercised their right to petition for redress by questioning misconduct.

118 In response Defendants escalated threats, increased fees created false charges intimidated attorneys and blocked access to filings.

COUNT 5
NINTH AMENDMENT RIGHT TO PRIVACY

119 Plaintiffs incorporate all prior paragraphs.

120 Defendants unlawfully exposed confidential crime victim information resulting in a violent home intrusion.

COUNT 6
STATE CREATED DANGER
FOURTEENTH AMENDMENT SUBSTANTIVE DUE PROCESS

121 Plaintiffs incorporate all prior paragraphs.

122 Defendants affirmative actions created and increased danger to Plaintiffs and directly preceded the December 11 2024 home intrusion.

COUNT 7
FAILURE TO INVESTIGATE AND PROTECT
AGAINST THE SHERIFF AND DISTRICT ATTORNEY

123 Plaintiffs incorporate all prior paragraphs.

124 Defendants refused to investigate impersonation threats, stalking and identity theft.

125 Defendants' failure to act allowed the danger to escalate.

COUNT 8
MONELL LIABILITY
AGAINST CITY OF LAKE CHARLES AND CALCASIEU PARISH POLICE JURY

126 Defendants engaged in conspiracy, slander,libel, and unethical ex parte communication.

127 Defendants maintained customs policies and practices that violated constitutional rights including suppression of filings, intimidation of counsel ex parte communications and refusal to investigate crimes.

COUNT 9
DECLARATORY JUDGMENT

128 Plaintiffs seek a declaration that Defendants practices described herein violate federal constitutional rights.

COUNT 10
INJUNCTIVE RELIEF
PROSPECTIVE ONLY

129 Plaintiffs seek a permanent injunction prohibiting future retaliation suppression of filings misuse of confidential information and unlawful detention.

XXVII PRAYER FOR RELIEF

130 Plaintiffs incorporate all prior paragraphs.

131 Plaintiffs respectfully request that this Court enter judgment in their favor and award the following prospective declaratory and injunctive relief.

132 A declaration pursuant to 28 U S C sections 2201 and 2202 that Defendants conduct described herein violates the First Fourth Ninth and Fourteenth Amendments to the United States Constitution.

133 A declaration that Judge Ronald C Richard and Lake Charles City Court violated Plaintiffs due process rights by exercising jurisdiction without service manufacturing accusations blocking medical access suppressing filings intimidating counsel fabricating addresses and retaliating against Plaintiffs.

134 A declaration that the Calcasieu Parish Police Jury, Calcasieu Parish Clerk, Calcasieu Parish Sheriff, and Calcasieu Parish District Attorney maintained unconstitutional customs practices and policies that violated Plaintiffs rights including refusal to investigate threats impersonation cyber intrusion stalking identity theft and related crimes.

135 A permanent injunction prohibiting Judge Richard Lake Charles City Court Calcasieu Parish Police Jury Calcasieu Parish Clerk Calcasieu Parish Sheriff and Calcasieu Parish District Attorney from engaging in retaliation ex parte communication suppression of filings unlawful detention misuse of confidential crime victim information discriminatory treatment and denial of medical accommodation.

136 A permanent injunction requiring the Calcasieu Parish Sheriff to conduct a full and thorough investigation into the individual or individuals impersonating Plaintiffs engaging in forgery, cyber intrusion, mail interception stalking and the illegal transfer of Plaintiffs property and financial instruments.

137 A requirement that the Calcasieu Parish District Attorney identify, charge and prosecute the individual or individuals responsible for impersonation identity theft forgery fraud and related criminal acts as recognized by Defendants own records and statements.

138 An order requiring the City of Lake Charles Calcasieu Parish Police Jury and Lake Charles City Court to correct all fabricated service entries, remove all invalid court costs, remove all fees associated with fictitious addresses and update Plaintiffs records to reflect accurate procedural history.

139 An order requiring the Calcasieu Parish Clerk of Court to properly file the March 2024 court order with transcript attached to reflect the true judicial demand date of July 2021 and to correct all inaccuracies including unauthorized provisions added without transcript basis.

140 An order prohibiting Defendants from interfering with Plaintiffs parenting rights requiring future proceedings to comply with due process and requiring equal enforcement of all court orders including enforcement of orders favorable to Plaintiffs.

141 An order requiring all individuals who engaged in impersonation forgery identity theft and theft of Plaintiffs vehicle and assets to undergo psychological evaluations and prohibiting all contact with Plaintiffs.

142 A permanent no contact order between Plaintiffs and any individual persons identified as participants in impersonation forgery stalking or harassment.

143 A change of venue for all ongoing matters involving Plaintiffs in Calcasieu Parish to prevent further retaliation, intimidation and constitutional violations.

144 A public acknowledgment or apology from Lake Charles City Court Ward 3 and Judge Ronald C Richard acknowledging misconduct including the improper December 30 2024 hearing convened while the case was divested.

145 Any additional equitable relief this Court deems just and proper to prevent further irreparable harm.

XXVIII VERIFICATION PURSUANT TO 28 U S C SECTION 1746

146 I Plaintiff S J K declare under penalty of perjury that I have read this First Amended Civil Rights Complaint and that the facts stated herein are true and correct to the best of my knowledge, information and belief.

Executed on November 10 2025
Location withheld for safety

S J K
Electronically signed
Plaintiff under pseudonym

XXIX PSEUDONYM DECLARATION

147 I Plaintiff S J K certify that I am a protected crime victim enrolled in the Texas Attorney General Crime Victims Program.

148 Disclosure of my full name or address would place me in grave danger of further stalking, impersonation retaliation and physical harm.

149 I therefore proceed under pseudonym and request that identifying information remain sealed or filed under seal in accordance with court order.

Executed on November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

XXX CERTIFICATE OF SERVICE

150 I certify that on November 10 2025 a true and correct copy of this First Amended Civil Rights Complaint will be served on each Defendant by United States Mail or as otherwise permitted by Federal Rule of Civil Procedure 5.

151 Plaintiffs proceed under pseudonyms. Plaintiffs service address is filed under seal pursuant to Court order.

152 Copies will be served on

Hon Ronald C Richard
Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

City of Lake Charles
1001 Ryan Street
Lake Charles Louisiana 70601

Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

Calcasieu Parish Police Jury
1015 Pithon Street
Lake Charles Louisiana 70601

Calcasieu Parish Clerk of Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish Sheriff
5400 East Broad Street
Lake Charles Louisiana 70615

Calcasieu Parish District Attorney
1020 Ryan Street
Lake Charles Louisiana 70601

Fourteenth Judicial District Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish District Court Administrator
1000 Ryan Street
Lake Charles Louisiana 70601

Executed on November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

FOOTNOTES

1 FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION protects the right to petition the government for redress and prohibits retaliation for exercising that right.

2 FOURTH AMENDMENT TO THE UNITED STATES CONSTITUTION prohibits unreasonable seizures including unlawful detention.

3 FOURTEENTH AMENDMENT TO THE UNITED STATES CONSTITUTION guarantees due process equal protection and substantive protections.

4 NINTH AMENDMENT protects unenumerated rights including privacy and personal safety.

5 42 U S C SECTION 1983 provides a cause of action for deprivation of constitutional rights under color of state law.

6 28 U S C SECTIONS 2201 AND 2202 authorize declaratory and injunctive relief.

7 LOUISIANA CONSTITUTION ARTICLE I SECTION 2 guarantees due process.

8 LOUISIANA CONSTITUTION ARTICLE I SECTION 3 prohibits arbitrary discrimination.

9 LOUISIANA REVISED STATUTES TITLE 46 SECTION 1844 provides crime victim confidentiality protection.

10 LOUISIANA REVISED STATUTES TITLE 14 SECTION 72 addresses forgery.

11 LOUISIANA REVISED STATUTES TITLE 14 SECTION 67 addresses theft.

12 LOUISIANA REVISED STATUTES TITLE 14 SECTION 73 addresses computer fraud.

13 STATE CREATED DANGER DOCTRINE recognizes liability where officials create or increase danger.

14 MONELL LIABILITY under 42 U S C SECTION 1983 holds municipalities liable for unconstitutional practices.

15 OFFICIAL CAPACITY SUITS treat actions against officials as actions against the governmental entity.

16 PSEUDONYM FILINGS permitted where disclosure threatens safety. SK

Verified by pdfFiller
11/13/2025

PROPOSED ORDER GRANTING PSEUDONYM

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

PROPOSED ORDER GRANTING LEAVE TO PROCEED UNDER PSEUDONYM AND TO FILE SERVICE ADDRESS UNDER SEAL

Considering Plaintiffs Motion to Proceed Under Pseudonym and to File Service Address Under Seal and the showing of good cause therein

IT IS ORDERED that the Motion is GRANTED.

IT IS FURTHER ORDERED that Plaintiffs may proceed in this action under the pseudonyms S J K and J K.

IT IS FURTHER ORDERED that Plaintiffs service address shall be filed under seal with the Clerk of Court and shall not appear on the public docket.

IT IS FURTHER ORDERED that Plaintiffs full names and service address shall be disclosed only as necessary to the Court and to counsel of record subject to any further protective order that may be entered.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

_____

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

CERTIFICATE OF SERVICE

I certify that on November 10 2025 I will cause a true and correct copy of the following documents

First Amended Civil Rights Complaint
Affidavit of S J K
Motion to Proceed Under Pseudonym
Proposed Order Granting Pseudonym
Motion for Temporary Restraining Order and Preliminary Injunction
Proposed Order for Temporary Restraining Order and Preliminary Injunction

to be served by United States Mail or other method authorized by Federal Rule of Civil Procedure 5 on the following

Hon Ronald C Richard
Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

City of Lake Charles
1001 Ryan Street
Lake Charles Louisiana 70601

Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

Calcasieu Parish Police Jury
1015 Pithon Street
Lake Charles Louisiana 70601

Calcasieu Parish Clerk of Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish Sheriff
5400 East Broad Street
Lake Charles Louisiana 70615

Calcasieu Parish District Attorney
1020 Ryan Street
Lake Charles Louisiana 70601

Fourteenth Judicial District Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish District Court Administrator
1000 Ryan Street
Lake Charles Louisiana 70601

Plaintiffs appear under pseudonyms. Plaintiffs service address is filed under seal with the Clerk of Court pursuant to Court order.

Executed on November 10 2025

S J K

Verified by pdfFiller
11/13/2025

Electronically signed
Plaintiff under pseudonym

PROPOSED ORDER FOR TRO AND PRELIMINARY INJUNCTION

PROPOSED ORDER
GRANTING TEMPORARY RESTRAINING ORDER
AND SETTING HEARING ON PRELIMINARY INJUNCTION

Considering Plaintiffs Motion for Temporary Restraining Order and Preliminary Injunction and the showing made therein

IT IS ORDERED that the Motion is GRANTED IN PART as follows

1 Defendants and their officers agents servants employees and all persons in active concert or participation with them are hereby temporarily restrained from

A Retaliating against Plaintiffs for filing or pursuing this action
B Disclosing Plaintiffs confidential personal identifying information including any address filed under seal
C Relying on or further recording fabricated addresses or fabricated service entries associated with Plaintiffs
D Using illegally obtained digital or mail based information to harass or intimidate Plaintiffs.

E. Contacting the plaintiffs in any method of communication.

F. Bullying, stalking, harassing of plaintiffs family members.

E. Refrain from any contact or retaliation against plaintiffs children.

2 Defendants are ORDERED to preserve all records, electronic data emails and files referenced in Plaintiffs Complaint.

3 A hearing on Plaintiff's request for a preliminary injunction is set for the _____ day of _____ 2025 at _____ in the United States District Court for the Western District of Louisiana Lake Charles Division.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

Transcript evidence of impersonation

From: True King <truekingfile@gmail.com>

To: Kent Castille <kcastille@cpso.com>

Date: Thu, 02 Jan 2025 15:29:15 -0500

Attachments:
Transcript pages 32-72.pdf

Judge ruled I was not in Louisiana at time of notary forgery.

There are multiple crimes that are occurring and here is the evidence on transcript

Paralegal to Oliver “Jackson” Schrumpf

Schrumpf Law Office, PLC
3801 Maplewood Drive
Sulphur, LA 70663
(337) 625-9077
(337) 625-8231 (fax)

If you have not executed a binding fee agreement or an agreement for representation, this firm does not represent you and this email is not an agreement of representation.

Please note that unless expressly stated otherwise, I have NOT expressly designated my email address as appropriate for electronic service of a pleading or other writing under LA CCP 1313.

Confidentiality Statement: This e-mail transmission, and any documents, files, or e-mail messages attached to it, may contain confidential information that is attorney work product and/or legally privileged. The information herein is also protected by the Electronic Communications Privacy Act, 18 U.S.C.A. 2510-2521. The information contained in this message and any file transmitted with it is transmitted in this form based upon a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. If you are not the intended recipient, or the person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify sender immediately via return email or by telephone at (337) 625-9077 and destroy the original transmission and its attachments without reading them or saving them to disk or otherwise. Thank you.

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

RE: Transcript Impersonation Case # 24-118583

From: Kent Castille <kcastille@CPSO.COM>

To: 'True King' <truekingfile@gmail.com>

Date: Thu, 02 Jan 2025 20:54:47 +0000

The documents you previously submitted to me in December of 2024 were attached to a report and forwarded to the District Attorney's Office. As of now, I have not received any documentation of the District Attorney's Office's ruling regarding the stated documents. Please contact the District Attorney's Office if you have any additional inquiries. Thank you.

From: True King <truekingfile@gmail.com>
Sent: Thursday, January 2, 2025 2:31 PM
To: Kent Castille <kcastille@CPSO.COM>
Subject: : Transcript Impersonation Case # 24-118583

3 part transcript . Evidence is undeniable there continues to be third person fraud please provide update on my case please ---------- Forwarded message --------- From: Jinnifer LeBlanc <jleblanc@ schrumpf-law. com> Date: Thu, Dec 26, 2024

3 part transcript . Evidence is undeniable there continues to be third person fraud please provide update on my case please

---------- Forwarded message ---------
From: Jinnifer LeBlanc <jleblanc@schrumpf-law.com<mailto:jleblanc@schrumpf-law.com>>
Date: Thu, Dec 26, 2024 at 1:35 PM
Subject: Transcript
To: True King <truekingfile@gmail.com<mailto:truekingfile@gmail.com>>

Thank you,
Jinnifer Marcantel
Paralegal to Oliver "Jackson" Schrumpf

Schrumpf Law Office, PLC
3801 Maplewood Drive
Sulphur, LA 70663
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LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING Plaintiff	*	
VERSUS	*	NO. 23-2124
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 Defendant	*	

* *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 14th day of November 2024, beginning at 11:00 a.m.

APPEARANCES

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P-3 Copy of front of Vehicle Title 28

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P-10 Copy of GEICO Declarations Page 63

DEFENDANTS' EXHIBITS:

None

PROFFERS

BY PLAINTIFF:

Proffer-1
Copy of CrossFit check-in dated 9-7-21 (previous marked as plaintiff exhibit 4) 30, 114

Proffer-2
Copy of CrossFit check-in dated 9-8-21 (previous marked as plaintiff exhibit 5) 34, 114

Proffer-3
Affidavit of CrossFit (previous marked as plaintiff exhibit 6) ... 38, 114

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* * *

PROCEEDINGS

* * *

COURT CALLED TO ORDER

* * *

THE COURT:

Good morning everyone. We have a number of things on the docket. I'm gonna try to move the, what I would call the quickie stuff, uh, and so I believe we have an eviction matter on the docket.

* * *

OTHER MATTERS CALLED

* * *

THE COURT:

All right. You may be seated. All right, counselors do we have everybody here? Do we ... I'm gonna call the matter of John Clifford J King versus Renee Amos, docket number 23-2124. Looks like we all have counselors here. All right, counselors make your appearance and then we'll have the witnesses sworn in.

MS. DOMINIC:

Good morning Your Honor. Kamie Dominic

on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

All right. Oliver?

MR. SCHRUMPF:

Oliver Shrumpf for John Clifford King.

THE COURT:

All right, now, Miss Amos, please raise your right hand. Mr. King, uh, you stay seated. I know you got your back. Raise your right hand, let's get you sworn in. Oh whoa, whoa, we got another witness. Any other witnesses in here? You a witness sir?

MS. DOMINIC:

No.

THE COURT:

Where's Ms. King?

MR. SCHRUMPF:

Ms. King is outside.

MR. KING:

In the lobby.

THE COURT:

Let's ... let's grab her real quick. We'll just get everybody sworn in at one time and that way we get it knocked out.

MS. DOMINIC:

And Your Honor, and then any witnesses besides Mr. King and my client, ask to be sequestered from the courtroom.

THE COURT:

Okay. No problem. No problem. We gonna do that and I can give them the sequestration speech when they come in. Just FYI, my staff, uh, we have ordered lunch and we will eat right through trial, uh, because I think we can move this along rather quickly. But, we hadn't had breakfast since 6:30 and we hungry. All right, now we got her in here ... all right, ma'am give us your full ... well, let me get you sworn in first and then we can ... all right, everybody raise your right hand.

(THREE WITNESSES SWORN)

* * *

RENEE AMOS

JOHN CLIFFORD J KING

SHUNTE KING

* * *

Witnesses called on behalf of the plaintiff, John Clifford J King and on behalf of the defendant, Renee Amos Notary Public

Notary ID# 29374, having been duly sworn by the Deputy Clerk of Court, were examined, and testified on their oath as follows:

THE COURT:

All right. So, I've got them, uh, uh, notified ... ma'am, give us your full name for the record real quick. Just speak loudly towards the microphone.

MRS. KING:

My name is Shunte Jones King.

THE COURT:

All right. Good deal. All right, Ms. King, what we're gonna do is, uh, he's a witness, she's a witness, but they're also parties so they get to stay in the room. You're a witness ... are you a witness? Okay, so, uh, you're gonna be put under what's called the rule of sequestration. That means you got to sit outside in the lobby and hang out until it's ... you're called to get on the witness stand. After you get on the witness stand and they're done with you, then you get to stay in the courtroom, okay? So you're gonna have to just take a seat outside and hang out until they call you in.

MRS. KING:

I'm supposed to bring something to your attention. I'm required by law, uh, by the state attorney general to ...

THE COURT:

Not right now. We'll do that when I bring you in, okay?

MRS. KING:

Okay.

THE COURT:

The rule of sequestration is in effect. Please remove yourself to the lobby. All right. All parties may have a seat. Now, uh, Mr. Schrumpf, you're the moving party with the plaintiff. So, uh, the ball is in your court and the way we're set up here with minimum number of witnesses, uh, I suggest we just keep everybody in their seats. Makes it easier, plus I don't want Mr. King having to come up and down where the witness stand is, okay? And just everybody remember, speak to the microphone. Mr. King, you got to get it to the microphone. Ms. Amos, got to get it to the microphone, okay? All right, go ahead Mr. Schrumpf.

MR. SCHRUMPF:

Your Honor ...

THE COURT:

... Any pretrial matters we need to address?

MR. SCHRUMPF:

Did you receive the pretrial memo that I sent?

THE COURT:

I did. I've received your pretrial memorandum.

MR. SCHRUMPF:

Okay.

THE COURT:

I've reviewed it ...

MS. DOMINIC:

And Your Honor, at this time, I would like to object to certain things that's in the pretrial brief. I wasn't ... my understanding it wasn't required of the Court ...

THE COURT:

It was not required.

MS. DOMINIC:

But I do ... oh so sorry.

THE COURT:

Get that mic. Sorry.

MS. DOMINIC:

Sorry. As I was saying Your Honor, I would like to object to certain things that's in a pretrial brief. As I ... as I mentioned, it wasn't a requirement of the Court but I am requesting, uh, to the Court to strike the mention of the fifteen thousand (15,000) purchase price from the pretrial brief due to lack of supporting evidence. Uh, the fifteen thousand (15,000) was due to the purchase ...

THE COURT:

.. let me, let me ...

MS. DOMINIC:

... alleged purchase price.

THE COURT:

Let me cut you off real, real quick. The pretrial brief is not evidence.

MS. DOMINIC:

Okay.

THE COURT:

It is not considered as such. I don't think it was actually even filed into the record. It was just provided to the Court 'cuz

that's what pretrial briefs generally are done. I'm sorry ma'am. I'm not worried about the pretrial brief. It don't mean anything to me one way or the other. It's just one side's way of kind of saying, hey here's what we're gonna do and here's what we think. It's got to get on here under oath before it means squat diddly to me, so don't ... I'm ...

MS. DOMINIC:

Yes Your Honor.

THE COURT:

... I'm just going to disabuse you of your concerns. You don't have to worry about that.

MS. DOMINIC:

Thank you Your Honor.

THE COURT:

Okay. So don't ... don't sweat that. Do we have any other pretrial matters? Any agreement on evidence? Anything of that nature?

MS. DOMINIC:

No Your Honor.

THE COURT:

You don't' have anything? Okay, well

let's get this party started. Go ahead Mr. Schrumpf.

MR. SCHRUMPF:

I'd like to call Renee Amos under cross examination.

THE COURT:

Okay. Now, Ms. Amos let me ... your lawyer will tell you this but let me give you sort of the quickie protocol. He's calling you as a witness under what's cross examination. He's not calling you under direct examination. That means he basically gets to treat you as a hostile witness in the sense of he gets to ask some leading questions and he gets to do things a little differently than he would be allowed to do, say with his own client, under direct examination. So, listen to the question. Answer the question to the best you can. If you're unsure, you have counsel. Look at counsel, uh, and I caution both sides. If you're testifying in any way Ms. Amos or Mr. King and your lawyer starts talking, quit talking all right? He's trying to, she's trying to do her job. Be quiet and let them do their job, okay? All right. Go ahead.

MR. SCHRUMPF:

May I approach?

THE COURT:

Yes sir. Thank you Ollie. It'd be nice if the judge can see some stuff.

MR. SCHRUMPF:

I'm gonna do it.

THE COURT:

Merci bon. Let me see ...

* * *

RENEE AMOS

* * *

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on her oath as follows:

* * *

CROSS EXAMINATION

BY MR. SCHRUMPF:

Q. Ms. Amos, please state your full name.

A. Renee Amos.

Q. And, what is your address?

A. I beg your pardon.

Q. Your address?

A. 1208 17th Street, Lake Charles, Louisiana.

Q. Are you a Louisiana Notary?

A. Yes, I am.

Q. Notary number 29374?

A. Correct.

Q. And you furnished a bond as required by law?

A. Yes.

Q. To be a notary? Do you have any additional insurance besides the insurance bond?

A. No, I do not.

Q. Do you know Charmaine Colston?

A. I'm aware of the name. I do not have a relationship with her.

Q. On September 7, 2021, did you do notary work for Charmaine Colston?

A. On September 7th of 2021, per the back of this title, that is my signature but I would also say ... I would stipulate that and explain there were two (2) people present.

Q. So is Exhibit 1 the, uh, notary work that you did on that date, September 7th 2021?

A. This is what you're talking about?

Q. Yes ma'am. I've labeled it Exhibit 1.

A. Since there's not a front of it, I do not see the front of the title, but it is my signature, so ...

Q. I have ... I have the front. It's coming up ...

A. Well, I don't see the front so this is my signature, if that's what you're asking.

Q. Okay. I offer Exhibit number 1 Your Honor.

THE COURT:

Okay. I'm ... and I'm trying to see where everything is too. I see a Charmaine name. I see a P.O. Box. I see a Charmaine (indiscernible) maybe ... I'm ... I'm trying ... and it's just so dad-gum blurry, I'm trying to figure out what it ... what it's saying.

MS. AMOS:

Uh huh.

THE COURT:

Where is ... oh, I see Ms. Amos' signature, uh, okay, all right, I got that part down. All right. Any objection counselor to the introduction of this into evidence as Plaintiff 1?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it will be admitted as Plaintiff 1. There you go Madame Clerk.

BY MR. SCHRUMPF:

Q. And the import of Exhibit 1 is a transferred title from John King to Charmaine Colston?

A. That is what it indicates, yes.

Q. Okay. And you kept an ID for that transaction, did you not?

A. My practice is to check the IDs of all parties, the buyer and the seller.

Q. And, I've shown you exhibit 2. Is ... exhibit 2 is the ID that you had for that transaction?

A. I cannot see the ID. I see the name of Charmaine Colston, so I will make the assumption that this is in fact her ID although it's not legible.

Q. Okay. I offer Exhibit 2 Your Honor.

THE COURT:

All right, subject to our identification issues, I think we all agree that that's the ID or driver's license or something. Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it'll be entered as Plaintiff 2.

BY MR. SCHRUMPF:

Q. Those documents were obtained by the Calcasieu Parish Sheriff's Office? Did ... did they get them directly from you?

A. No ma'am, no sir.

Q. I see there was no ID attached for John King.

A. I do not have a duty to keep copies of IDs. I check the ID and validate it when they're in my office. I would not have a copy of Mr. King's ID nor Ms. Colston's ID for that matter.

Q. And John King, uh, you have no ID for him from September 7th 2021?

A. I beg ... ask that question again. I'm sorry.

Q. You do not have an ID showing that John King was present on December ...

A. ... I ...

Q. ... September 7th 2021?

A. On September 7th 2021, per my practice, I would have seen the ID of John King as the purchaser, as the seller excuse me, and Charmaine Colston as the, uh, as the purchaser, but I do not have copies of those IDs.

Q. Do you know John King?

A. I do not know him.

Q. Would you recognize John King if you saw him?

A. The first time I ... I would ... I don't ... I saw

him that one (1) time in my home. Would I have recognized him if I had not seen him in this courtroom previously, no sir I would not.

Q. It's your testimony that two (2) people showed up on September 7th 2021. One of them was Charmaine Colston. Did you identify John King?

A. My testimony is that I identify the buyer and the seller. Two (2) people showed up. I identified Ms. Colston and I identified Mr. King. I had to have identification. That identification could have been an ID, a driver's license, in some cases a passport, but both parties were properly identified before I proceeded.

Q. Ma'am, was the title ... the back of that title already signed by someone before Ms. Colston came in with it?

A. No. The title was blank on the back. My ... my policy is to look at the title. I look at the front of the title first to make sure who the sellers are. Sometimes there are more than one sellers. I then turn the title on the back. Had there been a signature on the back, I could not have proceeded.

Q. It would have been wrong to notarize it if it had already been signed, correct?

A. If it was ... if it was already signed, I would

have ... if it was signed by Charmaine Colston I would have identified her and asked her why she signed it. If it was signed by John King, I would have validated that, but there was no signature on the back of the title. In those instances, the next thing I would have done if I had some suspicion was I would have gone to the Justice of the Peace. So, I would not have proceeded if I saw anything wrong.

Q. So you have an excellent memory of what occurred on that date?

A. I do not have a memory of what occurred on that date. That's been four (4) years ago. I do have an excellent memory of my process and procedure and my process and procedure does not change.

Q. This says that the consideration was one hundred dollars ($100.00)?

A. Sometimes when people do not want to do donations, they put a small price on it. What price they tell me that they pay is the price that I put in there. I have no obligation and no ... I do not have to watch money transfer. I ask what they paid. That is not part of what I am required to do. I am required to validate identification.

Q. So you did not see the hundred dollars ($100.00) transferred?

A. I cannot remember.

Q. Was it a check?

A. I do not know sir. They could ... I have no idea how they transferred it. It's very possible they transferred money in front of me but I do so many of these, uh, often times money is transferred, yes, and I'm not involved in that. I don't count it. I don't have anything to do with that. Not my job.

Q. Ms. Amos, would you agree that if John King was in New Jersey on September 7th 2021 that he could not have been the one that signed that document?

A. I have no idea, uh, I will not agree or disagree with that. I'm going to say that someone was in my residence on that day representing themselves as John King. I looked at a driver's license, identified it.

Q. But you did not keep a copy of the driver's license of the person that said he was John King?

A. Sir, I don't keep any driver's license. The massive amount of people that I see in a day, I could not possibly keep those records. I identify them and I move on.

MR. SCHRUMPF:

I tender the witness.

THE COURT:

All right. Ma'am, I guess if you wish

to, uh, do some directing and some follow up on his cross, go ahead.

MS. DOMINIC:

At this time Your Honor, I will waive that and wait, uh, to do my ... I'm sorry, call of chief ... chief of ...

THE COURT:

Call your case in chief?

MS. DOMINIC:

... to call my case in ...

THE COURT:

I hear you. I got you, okay. All right, thank you ma'am. I ... I want to commend you. You're doing ... you ... you talk into the microphones. That is a big deal, y'all. Keep it up. It helps Madame Clerk. It's hard on the lawyers and I guess maybe we need to get body mics before it's over with 'cuz the lawyers need to move around. They don't want to use you deputy, I don't know. You can hand them to the deputies and they'll do all the transporting around that way you don't have to ... to scurry.

MR. SCHRUMPF:

Yes, okay.

THE COURT:

And deputies, feel free to step up to get the stuff. You don't have to wait for him. I get it. The Marshal likes that process. I like that process. It keeps things orderly.

MR. SCHRUMPF:

Judge, I'm want to call John King.

THE COURT:

All right. All right, Mr. King, you are on the witness stand even though you're sitting in your seat, okay?

MR. KING:

Yes sir.

* * *

JOHN CLIFFORD J KING

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on his oath as follows:

* * *

DIRECT EXAMINATION

BY MR. SCHRUMPF:

Q. Please state your name.

A. John Clifford Joseph King, Sr.

Q. And where do you reside currently?

A. I am a resident of Louisiana, but I'm currently in, uh, New Jersey due to my wife ...

THE COURT:

Louder.

A. I am currently ...

THE COURT:

There you go.

A. I am a resident of Louisiana. I am currently living in New Jersey with my wife. She is a dual resident of New Jersey and Texas. She owns her house.

Q. How long have you been living in New Jersey?

A. I initially got my contract, uh, to go to New Jersey November of 2020 and, uh, I've been working ... well, I was working there until the end of 2021 and I got hurt and I'm using her insurance to ... while I'm hurt. So I've been there since 20 ... November of 2020.

THE COURT:

Mr. Schrumpf, we got to get you to the mic because the clerk ...

MR. SCHRUMPF:

I'm sorry.

THE COURT:

The court reporter ...

MR. KING:

I'm sorry.

MR. SCHRUMPF:

We'll both have to ...

BY MR. SCHRUMPF:

Q. All right. I show you exhibit 3, what I've labeled exhibit 3. That's the front of the Certificate of Title. Is ... is this for a vehicle that you had purchased?

A. Yes.

Q. And this says it's a 2011 Chevrolet Traverse and it's got the V-I-N number and all. Shows that you, uh, received this in April of 2021?

A. Yes. That's when I, uh, I paid it off, uh, April 5th 2021.

Q. You said that's when you paid it off?

A. I paid it off. The day I paid it off was April 5th 2021.

Q. When did you first acquire the vehicle?

A. I acquired the vehicle, uh, October of 2018.

Q. And what did you use to purchase it? How'd you fund it?

A. Uh, I, uh, I was working as a welding inspector and I used my funds from my job to pay for that.

Q. Did you borrow money against the car?

A. Yes. Yes, I borrowed money.

Q. Who'd you borrow the money from?

A. Southwest Louisiana Credit Union.

Q. And in April of 2021, you paid it off?

A. Yes sir.

Q. We'll get to that document later. All right, I offer Exhibit 3.

THE COURT:

Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. And then it will be entered as defense 3. I mean, Plaintiff 3.

BY MR. SCHRUMPF:

Q. And you're currently under medical care for a back injury?

A. Yes sir.

Q. When did that back injury occur?

A. Uh, May of 2021, I want to say. May or June. I'm not sure the exact day.

Q. All right. And you learned about Charmaine Colston having your car title after you paid it off?

A. Yes sir. The, uh ...

Q. Do you recall how you found out about that?

A. Yes sir. I, uh, I initially ... I went to the court

because she had it and I ... then I couldn't find it and then I filed a police report and when I got the police report back on, uh, October 3rd is when I was able to download the police report, October 3rd of 2022, that's when I discovered who exactly had it.

Q. Did you ever intend to give the car or sell the car to Charmaine Colston?

A. No, not at the time.

Q. Did you intend to, uh, transfer it to her?

A. No sir.

Q. Did you appear on September 7, 2021 before Ms. Amos and sign the ... the transfer of that document?

A. No sir.

Q. Now on Exhibit 1, this says that Charmaine Colston and you both ... and she's testified that both of you appeared. Were you there on September 7, 2021?

A. No sir. I was in New Jersey. I ... at the time, I would ... it would have ... I would have actually been at work.

Q. Did you ever actually see the title?

A. I've never seen the title. This is the only copy I've ever seen.

Q. And this came from the Sheriff's Department?

A. Yes.

Q. After you filed a complaint?

A. Yes.

Q. Do you have evidence that you were in New Jersey on September 7, 2021?

A. Yes. I have multiple pictures, multiple videos. I have, uh, I have my work reports.

Q. All right. Hold a minute. We'll start with exhibit 4.

MR. SCHRUMPF:

One for the judge and one for each of you.

BY MR. SCHRUMPF:

Q. Okay. Can you tell us what exhibit 4 is?

A. Exhibit 4 is my Cross Fit check in. Everyday when we go to class, we get checked in.

Q. All right. You go to class?

A. It's Cross Fit.

Q. And ...

MS. DOMINIC:

And Your Honor, I'd like to ...

Q. ... at the top left of this ...

THE COURT:

Hold on a second. I believe we have an objection.

MR. SCHRMPF:

Okay.

THE COURT:

Go ahead counselor.

MS. DOMINIC:

Yes. I would like to object to it. Lack of foundation, lack of authentication. It really doesn't tell ... it just has Cross Fit on it. It doesn't say where he's at or anything Your Honor.

MR. SCHRUMPF:

So ...

MR. KING:

Okay.

MR. SCHRUMPF:

We'll get to that.

MR. KING:

Yes sir.

MR. SCHRUMPF:

Your Honor, if I may, uh, ask him some more questions about it, I think we'll clear that up.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. At the top left is a date, September 7, 2021. It says HEIC Image. Is this something you get on your phone?

A. This is actually from the, uh, this is from the

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

Suit No.: 23-2124 *Trial Date:* 5/8/2024
Time: 9:00 AM

JOHN CLIFFORD J KING — Atty: Dustan J. Abshire

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 — Atty: Kamie T. Dominic

NOTES:

Rec 5/8/2024 CR2 9:47:44 /10:50

P- appears w/atty John Clifford J. King
D- appears w/atty Kamie Dominic

Hearing 5.00
Witness(es)
Documents
$5.00

Court grants plaintiff's oral motion to reset hearing and to amend pleadings to include Hartford Life Insurance Company; matter re-fixed until Thursday, November 14, 2024 @ 9:00 am; notices to be sent to all parties

BEFORE THE JUDICIARY COMMISSION OF LOUISIANA
SUMMARY OF ETHICAL VIOLATIONS

Submitted by:
Mrs Shunte King
fit4thekings@gmail.com
Date: 02/23/26

To the Honorable Members of the Judiciary Commission:

This submission summarizes serious procedural and ethical concerns arising from proceedings before Judge Ronald C. Richard involving:

Lake Charles City Court Case Nos. 23-2124 and 23-1206
14th Judicial District Court Case No. 24-5624
Calcasieu Parish Case No. 2021-2773
Impersonation Investigation Case No. 24-118583
Vehicle Investigation Case No. 2021-00123665
Third Circuit Appeal CA-25-0049
Western District of Louisiana Case No. 25-cv-1759
Essex County New Jersey Cases FV-07-000817-22 and C21039526

The concerns presented fall into the following categories:[1]

1. Exercise of jurisdiction without verified service
2. Constructive contempt without written notice or proper service
3. Identity and address irregularities in connection with contempt and warrant proceedings
4. Criminal referral under Case No. 24-5624 raising probable cause and identification concerns
5. Escalated and potentially inequitable cost imposition totaling approximately $5,000 on December 30, 2024
6. Transcript fee assessments that may have impaired appellate access
7. Post-appeal jurisdictional limitations under La. C.C.P. art. 2088
8. Overlapping involvement in matters connected to Calcasieu Parish Case No. 2021-2773
9. Request for review of communications involving Lake Charles College Prep leadership during 2021–2022

This complaint does not ask the Commission to adopt factual conclusions.

It respectfully requests that the Commission:

---

[1]

• Obtain full transcripts
• Review service returns and cost ledgers
• Review warrant affidavit in Case No. 24-5624
• Review communications between judicial staff and involved parties
• Consider interviews of relevant witnesses

The integrity of judicial proceedings requires clarity in service, notice, jurisdiction, and neutrality.

This complaint is submitted respectfully and in good faith for independent review.

Respectfully submitted,

Shunte King
fit4thekings@gmail.com

25-606

VERIFIED MOTION TO RECUSE
EMERGENCY MOTION TO STAY PROCEEDINGS
MOTION TO CONTINUE PRETRIAL AND TRIAL
AND MOTION TO CHANGE VENUE

FOURTEENTH JUDICIAL DISTRICT COURT
PARISH OF CALCASIEU, STATE OF LOUISIANA

JOHN KING SR.
Plaintiff

VERSUS

CHARMAINE COLSTON
Defendant

CASE NO. 2021-2773

VERIFIED MOTION

NOW INTO COURT, comes Plaintiff, John C. King Sr., appearing pro se, who files this Verified Consolidated Motion to Recuse the Honorable Judge Mitchell Redd and Disqualify Court Staff, Emergency Motion to Stay Proceedings, Motion to Continue Pretrial and Trial, and Motion to Change Venue, and respectfully states as follows.

This motion incorporates by reference all prior motions, objections, affidavits, and pleadings filed by Plaintiff in this matter, including filings made in September 2022, May 2023, November 23, 2024, December 2024, and February 2025, which placed the Court on notice of service defects, transcript violations, improper communications, and denial of constitutional rights.

Plaintiff verifies under oath that the facts stated herein are true and correct to the best of his knowledge and belief.

I. VERIFIED STATEMENT OF FACTS

1. Plaintiff is a lifelong Louisiana resident whose address of record has continuously been 123 North Louisiana Avenue, Lake Charles, Louisiana 70601.
2. Plaintiff has repeatedly documented that pleadings, notices, and court correspondence were sent to incorrect or fabricated addresses despite written corrections being on file with the Clerk of Court, resulting in missed deadlines and denial of notice.

3. Multiple court orders have been enforced against Plaintiff despite not being supported by a stipulated judgment transcript entered into the record, rendering such orders legally unenforceable under Louisiana law.[1]
4. Plaintiff placed the Court on notice, both in writing and on the record, that court staff engaged in communications and procedural actions affecting this case after Plaintiff's counsel withdrew and without notice to Plaintiff.
5. Plaintiff filed sworn affidavits and objections identifying improper service, transcript discrepancies, and ex parte conduct. Proceedings nevertheless continued without corrective action.
6. Opposing counsel, Orelia Lawdins Trent, threatened Plaintiff's spouse, an out of state resident, with contempt and incarceration if she did not comply with proposed depositions and discovery that were not authorized by court order, despite opposing counsel having no authority to compel or threaten across state lines.
7. Opposing counsel further contacted Plaintiff's spouse's graduate school with unfounded accusations and allegations, conduct outside the scope of lawful advocacy and unrelated to any court order.
8. Attorney Lakoshia Roberts never enrolled as counsel of record in Plaintiff's presence before the Court, yet Plaintiff was denied direct access to the Court and deprived of the right to fair counsel when the Court allowed her participation over Plaintiff's objection.
9. As a result of the cumulative conduct of the Court, its staff, and opposing counsel, Plaintiff, his spouse, his children, and extended family have suffered irreparable emotional distress, physical health impacts, and ongoing safety concerns.

II. MOTION TO RECUSE HONORABLE JUDGE MITCHELL REDD AND DISQUALIFY COURT STAFF

Louisiana Code of Civil Procedure article 151(B)(5) mandates recusal where a judge's conduct gives rise to a reasonable belief of bias or where the judge becomes personally embroiled in disputed facts.[2]

The Louisiana Supreme Court has held that even the appearance of impropriety is sufficient to require recusal where public confidence in judicial neutrality is undermined.[3]

A. Objective Appearance of Bias

The standard is whether a reasonable person, knowing all the circumstances, would harbor doubts as to the judge's ability to remain impartial. Continued oversight of proceedings marked by repeated service failures, enforcement of null orders, and disputed staff conduct meets this standard.

B. Structural Due Process Violations

Due process is violated where the tribunal is no longer neutral. When court staff act in coordination with one party or counsel, those actions are imputed to the court itself.[4]

C. Mandatory Recusal and Staff Disqualification

Because the Court and its staff are now material actors and potential witnesses to disputed facts, continued participation violates Louisiana Constitution article I, section 2 and the Fourteenth Amendment to the United States Constitution. Disqualification of chambers staff is necessary to cure the taint. Reassignment alone is insufficient.

III. EMERGENCY MOTION TO STAY ALL PROCEEDINGS

Once a motion to recuse is filed, all substantive proceedings must halt until recusal is resolved.[5]

Proceeding with pretrial conferences, discovery enforcement, or trial settings while recusal is pending creates irreparable harm and risks voidable proceedings.

Plaintiff respectfully requests an immediate stay of all hearings, discovery, deadlines, enforcement actions, and trial settings pending resolution of recusal.

IV. MOTION TO CONTINUE PRETRIAL AND TRIAL

Because a stay is mandated during the pendency of a recusal motion, any scheduled pretrial conference or trial must be continued as a matter of law.

Good cause exists to continue all settings until jurisdiction, judicial neutrality, and venue are lawfully resolved.

V. MOTION TO CHANGE VENUE

Due to cumulative due process violations, loss of a neutral tribunal, and involvement of court staff as disputed actors, venue in the Fourteenth Judicial District Court is no longer constitutionally viable.

Transfer to a neutral judicial district is required to preserve Plaintiff’s right to an impartial tribunal and public confidence in judicial proceedings.

VI. TIMELINE OF DUE PROCESS AND CIVIL RIGHTS VIOLATIONS

September 2022
Plaintiff filed objections and motions citing lack of service and improper filings.

May 2023
Plaintiff objected to unapproved counsel participation and denial of access to the Court.

November 23, 2024
Plaintiff filed sworn affidavits documenting service manipulation and transcript issues.

December 2024
Plaintiff filed emergency pleadings citing continued improper service and staff conduct.

February 2025
Plaintiff filed motions placing the Court on notice of federal due process violations and civil rights deprivations.

VII. PRESERVATION OF FEDERAL RIGHTS

Plaintiff expressly preserves all claims under 42 U.S.C. sections 1983 and 1985. No waiver of federal remedies is intended by participation in state proceedings.[6]

VIII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Honorable Court:

Order immediate recusal of Honorable Judge Mitchell Redd
Disqualify all chambers staff involved in this matter
Stay all proceedings pending reassignment
Continue all pretrial and trial settings
Transfer venue to a neutral judicial district
Grant all further relief deemed just and proper

FOOTNOTES

1. ***Dolsen v. City of New Orleans, 157 La. 486, 102 So. 583 (1925).***
2. ***La. Code Civ. Proc. art. 151(B)(5).***
3. ***State v. Connolly, 2006-0540 (La. 6/2/06).***
4. ***In re Murchison, 349 U.S. 133 (1955).***
5. ***State v. Price, 274 So.2d 194 (La. 1973).***
6. ***U.S. Const. amend. XIV; 42 U.S.C. sections 1983 and 1985.***

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served this date by electronic mail upon counsel of record for Defendant, Orelia Lawdins Trent, and copied to the Clerk of Court, Fourteenth Judicial District Court.

DATED this ___ day of _____ 2026.

John C. King Sr.
Pro Se
123 North Louisiana Avenue
Lake Charles, Louisiana 70601
truekingfile@gmail.com

ORDER

IT IS ORDERED that the Motion to Recuse is ☐ GRANTED ☐ DENIED.
IT IS FURTHER ORDERED that all proceedings are ☐ STAYED.
IT IS FURTHER ORDERED that pretrial and trial are ☐ CONTINUED.
IT IS FURTHER ORDERED that venue is ☐ TRANSFERRED ☐ DENIED.

SIGNED this ___ day of _____ 2026.

JUDGE PRESIDING

_____

COVER LETTER TO CLERK

John C. King Sr.
123 North Louisiana Avenue
Lake Charles, Louisiana 70601
truekingfile@gmail.com

Date: _____ 2026

Clerk of Court
Fourteenth Judicial District Court
Calcasieu Parish
Lake Charles, Louisiana

Re: King v. Colston, Case No. 2021-2773
Filing of Consolidated Verified Motion

Dear Clerk,

Please file the enclosed Consolidated Verified Motion to Recuse, Emergency Motion to Stay Proceedings, Motion to Continue Pretrial and Trial, and Motion to Change Venue in the above referenced matter.

This filing includes proposed orders and a certificate of service. The motion is submitted for immediate docketing and consideration.

Please confirm filing and provide stamped copies for my records.

Thank you for your attention.

Respectfully,

John C. King Sr.
Pro Se

_____

COURT OF APPEAL

THIRD CIRCUIT

STATE OF LOUISIANA

NO. _____

JOHN CLIFFORD J. KING
Plaintiff/applicant
VERSUS
RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY
Defendants-respondents

APPLICATION FOR WRIT OF REVIEW TO THE
THIRD CIRCUIT COURT OF APPEAL
NO. _____

FROM THE WARD 3 / LAKE CHARLES CITY COURT
PARISH OF CALCASIEU, STATE OF LOUISIANA
NO. 23-2124
HONORABLE RON RICHARD, PRESIDING

ORIGINAL APPLICATION AND BRIEF OF PLAINTIFF-APPLICANT, JOHN CLIFFORD J. KING, FOR WRIT OF REVIEW TO THE LAKE CHARLES CITY COURT And REQUEST FOR EXPEDITED CONSIDERATION And STAY

A CIVIL CASE

Respectfully submitted:

Oliver "Jackson" Schrumpf
Attorney for Applicant
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
Appeal Counsel
Bar Roll No. 11832

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I. APPLICATION FOR WRIT OF CERTIORARI

The application of JOHN CLIFFORD J. KING, plaintiff, and Oliver Schrumpf, Attorney, respectfully represents:

A. Applicant is aggrieved by the orders of the Honorable Ronald Richard, Ward 3 / Lake Charles City Court Judge on December 30, 2024 and applicant is entitled to have this honorable court grant a supervisory writ to review and reverse those orders.

B. A statement of the considerations required by Rule 4-5 C. of the Uniform Rules of Courts of Appeal, a memorandum setting forth the statement of the case, an assignment of errors, a summary of the argument, and an argument addressing the assignments of error on the facts and law; a verification of the application, and appendix containing the requisite exhibits, are all annexed here and made a part of this application.

A request for expedited consideration and stay of proceedings pending decision is attached.

Wherefore, applicant prays that after due consideration, in the discretion of this honorable court, that a supervisory writ be granted, and that thereafter the orders of the Ward 3/ Lake Charles City Court aggrieving applicant be reversed:

A. Reinstating the pauper status of John Clifford J. King, Plaintiff; and

B. Staying further hearings pending the devolutive appeal.

OLIVER "JACKSON" SCHRUMPF
Attorney for applicant

Sworn to and subscribed before me this 23rd day of January, 2025.

Notary Public Jinnifer L. LeBlanc
Notary No. 55493

REQUEST FOR EXPEDITED CONSIDERATION AND STAY OF PROCEEDINGS

The Trial Court has granted a stay suspending the Court's Order for counsel to appear on January 15, 2025 to represent John King and/or Shunte King in matters set by the Court for hearing (contempt and hearings on the motions filed by King In Proper Person), but counsel prays that this Court of Appeal grant expedited consideration of this application and stay all trial court proceedings pending decision on this application and eventually the devolutive appeal.

The trial Court's sua sponte retroactive rescission of its pauper order in this case will prevent the pauper plaintiff, John King, from pursuing a devolutive appeal unless this application is granted and the trial court order is reversed.

Additionally, the trial court is attempting to exert its control over the plaintiff (and plaintiff's spouse) who reside in New Jersey, by ordering local counsel to appear at hearings for which Counsel does not represent the plaintiff and for which counsel will not be compensated.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

II. STATEMENT OF THE CONSIDERATIONS WARRANTING THE GRANTING OF WRITS

A. **Orders issued after jurisdiction divested.**

A judgment was rendered on November 14, 2024, after trial on the merits. The judgment denying all of plaintiff's requested relief was signed on November 21, 2024.

An order of appeal was entered on December 3, 2024 granting a Devolutive appeal from the Judgment dated November 21, 2024. In accordance with La. C.C.P. 2088, jurisdiction is "divested" except for certain limited exceptions (none pertinent here). On December 30, 2024, the Court issued orders not allowed under La. C.C.P. 2088.

(1) Retroactively rescinding the Order granting plaintiff Pauper status, and

(2) Ordering Oliver Schrumpf to represent the plaintiff in contempt proceedings for pleadings and communications made by plaintiffs with court personnel before and after the appeal was entered.

B. **Interference with Attorney-Client contract.**

Despite the jurisdiction of the Court being divested, the Trial Court ordered counsel for John King in the primary case (King vs Amos and Hartford) to appear on December 30, 2024 without any advance notice of what issues were to be heard; and then on December 30, 2024 ordered counsel to appear again on January 15, 2025, [Apparently, post trial, John King filed pleadings In Proper Person after the trial court jurisdiction was divested and the Court wants to hold King in Contempt for the allegations

being made by King or the Court wants counsel to represent King in the claims King made In Proper Person. [The trial Court should have merely declined to take any action since its jurisdiction is divested.] Counsel only represents John King on the claim against the Notary and her bonding company for executing a bill of sale when John King was in New Jersey or New York and not present in Lake Charles, La. Counsel has advised King to retain separate counsel for any contempt proceedings. But since King continues to reside in New Jersey, the Court is attempting to gain control over King through counsel in the core case. Counsel has less control over the actions of John King than the Court does.

C. **Sua Sponte Rescission of In Forma Pauperis order.**

Not only was jurisdiction of the Trial Court divested by the appeal order, but the Trial Court then, without notice or contradictory hearing, announced that the Court was Sua Sponte Rescinding the previous order granting pauper status. The Court claimed grounds as Mr. King's spouse is not a "third party" suitable to sign the affidavit of poverty. {But see La. C.C.P. 5183, prohibiting only the party's **attorney** from signing as the third party.} The Trial Court also made reference to some out of court communication by King about attorney fees, but without advance notice, no opportunity for meaningful response was granted to plaintiff. The effect of rescinding pauper status is to require plaintiff to pay thousands of dollars in Court fees immediately in order to have the Trial Court's decision reviewed by the Court of Appeal, effectively denying plaintiff an appeal. Additionally, the Court is ordering counsel to represent King in matters that

counsel has not been retained to represent King in. This is taking time and effort of counsel without compensation.

C. Why expedited granting of writs is appropriate in this case.

Plaintiff fully intends to pursue the devolutive appeal on the merits of this case and believes that upon review, the Trial Court decision will be reversed. However, the actions of the trial court, taken after jurisdiction was divested, effectively deny plaintiff a right of appeal.

CONCLUSION:

The decisions of the Trial Court made on December 30, 2024 should be reversed:

A. John King's Pauper Status should be maintained.

B. Oliver Schrumpf should be relieved of the Order that he represent John King in contempt proceedings, or in issues filed In Proper Person by King after jurisdiction divested.

C. Further proceedings in the trial court should be stayed while the matter is heard by the Court of Appeal.

III. MEMORANDUM OF LAW

A. Statement of the Case and Prior Proceeding

FACTS:

John Clifford J. King contacted Oliver Schrumpf on October 31, 2024 requesting Schrumpf represent him in a case against a Louisiana Notary (Rene Amos) who had notarized a vehicle transfer of King's vehicle on September 7, 2021 at a time when the owner of the vehicle (John King) was out of the state of Louisiana (in New Jersey or New York). King e-mailed a

copy of the petition and a copy of the investigation report from the Calcasieu Parish Sheriff's office to Schrumpf. On November 6, 2024, Schrumpf agreed to represent King in the matter against the Notary. On November 7, 2024 Schrumpf filed a Motion to Enroll and a Motion to Continue the case (then set for trial on November 14, 2024). The trial court ordered Schrumpf to appear for a hearing that day (November 7, 2024) before authorizing the enrollment. Judge Ron Richard advised Schrumpf that John King had been filing ex parte communications with the Court making allegations that the Court did not appreciate and that the case had been set for trial several times. The Court granted the enrollment but denied the Motion to Continue and confirmed that trial would occur on November 14, 2024. The Court also denied a request for plaintiff to appear via Zoom unless he could provide to the court an excuse signed by a physician by Monday, November 11, 2024 (a judicial holiday). Schrumpf advised his client that he must obtain a signed excuse from a doctor and have it to the Court by Monday, November 11, 2024 or make arrangements to be present for trial on November 14, 2024. The Court and Schrumpf's office were closed November 11, 2024 (Veteran's Day). King e-mailed a document signed by a doctor to the court on November 11, 2024, but, despite a back condition, managed to fly from New Jersey to Lake Charles to be present for the trial. The trial court found that Mr. King in deed was not in Lake Charles on the date the notary claimed she notarized his signature, but the court ruled against Mr. King on November 14, 2024, and signed a judgment denying his claim on November 21, 2024. The result of the trial is the

subject of a devolutive appeal granted December 3, 2024. However, this present Writ Application involves the Court's order for Schrumpf to appear for a hearing on December 30, 2024 after jurisdiction of the trial court had divested, and the Court's Sua Sponte rescission on December 30, 2024 of the Pauper Order previously entered in the case.

IV. ACTIONS BELOW:

A. On December 30, 2024, the Trial Court SUA SPONTE and without prior notice, rescinded its prior order granting pauper status to John King. This in effect denies King's right to appeal the decision on the merits of the case unless he can find several thousand dollars to pay costs within 20 days.

B. On December 30, 2024, the Trial Court Ordered Oliver Schrumpf to represent John King in contempt proceedings for filing of ex parte pleadings with the Lake Charles City Court on December 12, 2024 or at trial of the issues raised by those pleadings. The pleadings were filed by John King via e-mail. Even though King copied the pleadings to Schrumpf, Schrumpf neither assisted, counseled, or even knew that the pleadings were being prepared or filed by King. Schrumpf did not contract to represent King on contempt charges or on the clams raised in those pleadings, and after the claims were brought to Schrumpf's attention by the Court, Schrumpf advised King he should contact an attorney with criminal law expertise to represent him on the contempt counts.

Schrumpf does not hold himself out as current in practicing criminal law.

V. SPECIFICATIONS OF ERROR AND ISSUES FOR REVIEW

A. The Trial Court erred in taking action after trial court jurisdiction divested to retroactively rescind the Pauper status of John King, thereby depriving the pauper plaintiff of a right of devolutive appeal.

B. The Trial Court erred in ordering attorney Oliver Schrumpf to defend John King on charges for contempt of court or to try allegations raised in pleadings filed by John King In Proper Person which were done without knowledge, assistance, or counsel of attorney Schrumpf.

VI. SUMMARY OF ARGUMENT

A. **Pauper Status**: Jurisdiction of the trial court divested on December 3, 2024 with the granting of the devolutive appeal [See Order Granting Appeal, Appendix C and La. C.C.P. 2088]. Thereafter the trial court did not have jurisdiction to order counsel to a hearing on December 30, 2024 or to SUA SPONTE retroactively rescind the order granting pauper status to John King. {See transcript December 30, 2024, p. 21} Furthermore, the Court's reasoning for rescinding the Pauper Order was erroneous: Mrs. King is not a "third party disallowed from signing as an affiant". See La. C.C.P. 5183 A. (2). Additionally, the Court may only reconsider its original order granting the application "in a contradictory hearing" [La. C.C.P. 5183 B.

(3)]. This process would require notice and an opportunity to prepare for the hearing, which did not occur on December 30, 2024.

B. **Ordering Counsel to represent Mr. King in a Contempt Proceeding.** When John King sent an e-mail to the Lake Charles City Court on December 12, 2024 (and copied the e-mail to Oliver Schrumpf), the Court was upset with Mr. King's conduct and wanted to punish him, but the Court did not have jurisdiction to entertain Mr. King's pleadings. The proper action of the Court would have been to decline to take any action on the pleadings until jurisdiction is returned to the trial court. Instead, the Court ordered Oliver Schrumpf to appear on December 30, 2024 and on that date, the Court Ordered Oliver Schrumpf to appear January 15, 2025 to defend John King on contempt charges and/or to represent Mr. King on the matters in his December 12, 2024 In Proper Person pleadings. Oliver Schrumpf did not counsel Mr. King to file the December 12, 2024 pleadings, did not prepare the pleadings, did not sign the pleadings, and did not know that Mr. King had in mind to file the pleadings. More importantly, Oliver Schrumpf did not contract to represent Mr. King on any of the claims made in his December 12, 2024 filing. The Court Ordering Oliver Schrumpf to pursue claims on behalf of John King that Schrumpf did not contract to perform exceeds the authority of the Court. When jurisdiction is returned to the trial court, the Court may set a hearing and notify John King of the hearing date and if Mr. King appears in person or hires an attorney to represent him, the Court may then make rulings on Mr. Kings' pleadings as appropriate.

Oliver Schrumpf should not be commanded to use his time and effort to pursue matters he did not undertake in his agreement with Mr. King.

VII. ARGUMENT AND LAW

A. THE TRIAL COURT'S JURISDICTION OVER THE CASE DIVESTED WHEN THE ORDER OF DEVOLUTIVE APPEAL WAS GRANTED ON DECEMBER 3, 2024.

See Order granting Devolutive Appeal. Appendix C.

La. C.C.P 2088 provides:

> Art. 2088. Divesting of jurisdiction of trial court
>
> A. The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal and the timely filing of the appeal bond, in the case of a suspensive appeal or on the granting of the order of appeal, in the case of a devolutive appeal. Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following:
>
> (1) Allow the taking of a deposition, as provided in Article 1433.
>
> (2) Extend the return day of the appeal, as provided in Article 2125.
>
> (3) Make, or permit the making of, a written narrative of the facts of the case, as provided in Article 2131.
>
> (4) Correct any misstatement, irregularity, informality, or omission of the trial record, as provided in Article 2132.
>
> (5) Test the solvency of the surety on the appeal bond as of the date of its filing or subsequently, consider objections to the form, substance, and sufficiency of the appeal bond, and permit the curing thereof, as provided in Articles 5123, 5124, and 5126.
>
> (6) Grant an appeal to another party.
>
> (7) Execute or give effect to the judgment when its execution or effect is not suspended by the appeal.
>
> (8) Enter orders permitting the deposit of sums of money within the meaning of Article 4658.
>
> (9) Impose the penalties provided by Article 2126, or dismiss the appeal, when the appellant fails to timely pay the estimated costs or the difference between the estimated costs and the actual costs of the appeal.

(10) Set and tax costs, expert witness fees, and attorney fees.

(11) Certify a partial judgment or partial summary judgment in accordance with Article 1915(B).

(12) Amend a judgment to provide proper decretal language under Article 1918 or 1951.

B. In the case of a suspensive appeal, when the appeal bond is not timely filed and the suspensive appeal is thereby not perfected, the trial court maintains jurisdiction to convert the suspensive appeal to a devolutive appeal, except in an eviction case.

Amended by Acts 1964, No. 4, §1. Acts 1968, No. 128, §1. Acts 1977, No. 175, §1, eff. Jan. 1, 1978. Acts 1983, No. 126, §1; Acts 2008, No. 658, §1; Acts 2021, No. 259, §2.

Accordingly, the Trial Court had no authority to Sua Sponte rescind the In Forma Pauperis Order previously granted in the case, nor to Order Oliver Schrumpf to appear at hearings or to defend John King on contempt charges or pursue Mr. King's In Proper Person filings which occurred after the Court's jurisdiction had divested. The trial court should have simply declined to take any action on the In Proper Person pleadings filed by Mr. King after jurisdiction divested.

Alternatively, even if this Court finds that the trial court retained jurisdiction to reconsider the granting of the application for pauper status, the Court's ruling should be reversed because: the grounds stated are contrary to law: [Transcript of December 30, 2024 p. 21 the Court found that Mrs. King was "not a third party" as required by La. C.C.P. 5083]. In fact, La. C.C.P. 5083 A. (2) specifically states: "the affidavit of a third person other than the applicant's attorney...". Therefore, a spouse qualifies to sign the affidavit of poverty unless she is also "the applicant's attorney".

Finally, even if the Court of Appeal does not find fault with any of the foregoing, the statute allows the court to reconsider its original order

"on its own motion at any time **in a contradictory hearing**." {La. C.C.P. 5083 B. (3). A contradictory hearing would provide notice and an opportunity to be heard which did not occur on December 30, 2024. Had there been notice of the issues to be considered (including reconsideration of pauper status), counsel may have been able to offer evidence to contradict the Court's claims. For instance, Mr. King did not have $12,000 to pay attorneys. But Mr. King may have received grants from civic organizations to help him pay attorneys because of the wrongs which had been done to him when his vehicle was stolen and a Louisiana Notary purportedly notarized his signature on September 7, 2021 at a time when Mr. King was in New Jersey or New York.

CONCLUSION

This application for supervisory writs should be granted to reverse the orders of the trial court on December 30, 2024: A. Retroactively rescinding the Pauper Status Order previously granted to John King; and B. Ordering Oliver Schrumpf to appear and represent John King on contempt or other matters raised in In Proper Person pleadings filed by John King after the Court's Jurisdiction had been divested.

Respectfully submitted by Attorney for Applicant, JOHN CLIFFORD J. KING and his attorney, Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF, Appeal Counsel
Bar Roll No. 11832
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077

VERIFICATION

I certify that the allegations in the foregoing application for writ of certiorari are true and correct, to the best of my knowledge, information, and belief, and that a copy of this application has been delivered to the Trial Judge, Ron Richard, via e-mail ron@lccitycourt.org

and to the below listed counsel for defendant:

Ed Bauman via e-mail ed@lakecharlesattorney.com

Oliver Schrumpf

Date OLIVER "JACKSON" SCHRUMPF

Sworn to and subscribed before me this 23rd day of January, 2025.

Jinnifer L. LeBlanc

Jinnifer L. LeBlanc
Notary No. 55493

Notary

CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing Application for Writ of Review and for Stay has been served on the presiding trial judge and all opposing counsel, by depositing a copy in the U.S. Mail, postage prepaid, properly addressed to all counsel, and to the Third Circuit Court of Appeal, to wit:

Third Circuit Court of Appeal — by Hand Delivery
Judges
P.O. Box 16577
Lake Charles, Louisiana 70616

Ed Bauman
Counsel for Defendants,
Amos and Hartford — Via e-mail: ed@lakecharlesattorney.com
Lake Charles, La. 70602-3010

Judge RON RICHARD — ron@lccitycourt.org
Judge, Ward 3/Lake Charles City Court

Thus done at Sulphur, La. This 24 day of January, 2025.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

APPENDIX

TAB #		Page(s)
A.	Final Judgement November 21,2024	19-20
B.	Motion for Devolutive Appeal	21
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D.	Copy of order granting Pauper status August 13, 2024	24-27
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MinuteID: 1869063

STATE OF LOUISIANA, PARISH OF CALCASIEU

CITY COURT OF LAKE CHARLES

NOTICE OF JUDGMENT

JOHN CLIFFORD J KING

Vs. No. **23-2124**

RENEE AMOS NOTARY PUBLIC NOTARY ID# 2937

TO: John Clifford J King
Thru: Attorney Oliver Jackson Schrumpf
3801 Maplewood Drive
SULPHUR, Louisiana
of said Parish Calcasieu

You are hereby notified that a:

JUDGMENT

has been filed on **11/19/2024** and signed by Judge **Judge Richard** on **11/21/2024** in the above numbered and entitled cause as per certified copy attached heret

Witness the HONORABLE JAMIE B. BICE RONALD C. RICHARD, Judges of said Court,

this **21** day of **November**, **2024**

Deputy Clerk of Court

TRUE COPY

23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that Notice of Judgment was mailed to the plaintiff, John Clifford J King through attorney Oliver Jackson Schrumpf and to defendant, Renee Amos through attorney Kamie T. Dominic this 21st day of November 2024.

CLERK

Ronald C. Richard

A TRUE COPY
Date: 11-21-2024
CLERK

REC'D LC CITY COURT CIV
'24 NOV 19 AM8:39

JOHN CLIFFORD J KING : LAKE CHARLES CITY COURT

VS . NO. 23-2124 : PARISH OF CALCASIEU

RENEE AMOS : STATE OF LOUISIANA
NOTARY PUBLIC
NOTARY ID #29374

FILED: 11-19-2024 : _____
~~DEPUTY~~ CLERK OF COURT

JUDGMENT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, and his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing this matter and for reasons orally assigned, entered the following judgment:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT READ and SIGNED this 21st day of November, 2024, in Lake Charles, Calcasieu Parish, Louisiana.

RON RICHARD, JUDGE DIVISION B
JUDGE, LAKE CHARLES CITY COURT

Ronald C. Richard

A TRUE COPY
11-21-2024
Clerk

RECD LC CITY COURT CIV
'24 DEC 2 AM11:38

JOHN CLIFFORD J KING	:	WARD 3/LAKE CHARLES CITY COURT
VERSUS NO. 2023-2124	:	PARISH OF CALCASIEU
RENEE AMOS NOTARY PUBLIC ID #29374	:	STATE OF LOUISIANA
FILED: 12-2-2024	:	~~DEPUTY~~ CLERK OF COURT

MOTION AND ORDER FOR DEVOLUTIVE APPEAL

ON MOTION OF Oliver "Jackson" Schrumpf, counsel for John Clifford J King, plaintiff herein, for a devolutive appeal from the judgment rendered November 14, 2024, read and signed November 21, 2024, notice of which was mailed November 21, 2024, and from the judgment ("Ruling") denying plaintiff's claims against Renee Amos.

IT IS ORDERED that a devolutive appeal be and is hereby granted to John Clifford J King and that the appeal be returnable to the Court of Appeal, Third Circuit, State of Louisiana, at Lake Charles, Louisiana, upon payment of costs in accordance with law.

SO ORDERED this 3rd day of December, 2024, in Lake Charles, Calcasieu Parish, Louisiana.

JUDGE ~~RON~~ RICHARD

Ronald C. Richard

Prepared by:

BY: Oliver Schrumpf
OLIVER "JACKSON" SCHRUMPF #11832
SCHRUMPF LAW OFFICE,
A Professional Law Corporation
3801 Maplewood Drive
Sulphur, Louisiana 70663
(337) 625-9077; Fax (337) 625-8231
oschrumpf@schrumpf-law.com

12-3-2024

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS. NO. 23-2124		PARISH OF CALCASIEU
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374	:	STATE OF LOUISIANA
FILED: 12/5/2024	:	DEPUTY CLERK

ORDER

Considering the petition for devolutive appeal wherein JOHN CLIFFORD J KING was granted a devolutive appeal from the judgment rendered in the above entitled and numbered cause, returnable in the Court of Appeal, Third Circuit, State of Louisiana, on the 16th day of January, 2025.

Lake Charles, Louisiana, this 5th day of December, 2025.

RONALD C. RICHARD
CITY JUDGE, DIVISION B

Suit No. 23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a certified copy of the Motion and Order for Devolutive Appeal signed by Judge Ronald C. Richard has this 3rd day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

CLERK

LAKE CHARLES CITY COURT
WARD THREE
CALCASIEU PARISH
STATE OF LOUISIANA

John C. J. King Sr. :
Vs. No. 23-2124 :
Renee Amos :
7-30-2024 :
FILED

DEPUTY CLERK OF COURT

In Forma Pauperis AFFIDAVIT

All questions must be answered in full.
Clients of Federally Chartered Legal Services Corporations only answer questions 1-8 and 11-13.

1. **Full Name** John C. J. King Sr
   Social Security No. 1934 **Date of Birth** 04-17-1986 **Sex** M

2. **Address** 123 N. Louisiana Ave. Lake Charles,LA
   (Box No. or Street Address) (City) (State and Zip Code)

3. **Telephone No(s).** 318-995-1705
   (Home) (Work)

4. **Are you a student?** yes **If so, please indicate the name of the school you are attending:** Essex Vocational and Technical

5. **What is your occupation?** Temoirary Disabled Unemployment **Are you employed?**
6. Injured
   Name of your employer None **Employer's Address** N/A **Telephone No.**
   How long have you been so employed?
   If unemployed, list the name of your last employer FTC
   If unemployed, how long have you been unemployed 6 Months

6. **Income: Weekly Wages** $0 **Monthly Wages** $0
   Monthly deductions: Federal Income Tax 14944 **FICA**
   Other deductions
   Any other income
   Is your income less than or equal to 125% of the federal poverty level? yes

7. **Marital Status:**
   Single ___ **Married** ✓ **Separated** ___ **Divorced** ___ **Widowed** ___ **Concubine** ___
   How many children do you support who are under 18? 3
   How many children live with you? 3
   Do you have any other dependents? 0 **State names, ages, and relationship:**

19

ELECTRONIC
FILE DATE: 7-30-2024

Jayla King;15;daughter / John King Jr;14;son / Jakai King,5;son

Is your spouse employed? No **If so, please indicate the name of your spouse's employer** Graduate Student
Spouse's employer's address N/A
Telephone No. 318-995-1705 **Wages: Weekly$**_____ **Monthly $**_____

8. **Do you or your spouse receive any of the following income or support?**_____
   If so, please state the monthly amount:
   SSI 0
   TANF 0
   Child support 0
   Disability 0
   Workers comp 0
   Rent Supplement 0
   Unemployment benefits 0
   Food stamps 0

9. **Do you own or have an interest in any of the following? (Including community property)**

House 0	**Value $** 0	**Balance owed $** 0			
Auto 0	**Value $** 0	**Balance owed $** 0			
Truck 0	**Value $** 0	**Balance owed $** 0			
Watercraft 0	**Value $** 0	**Balance owed $** 0			
Livestock 0	**Value $** 0	**Balance owed $** 0			
Machinery 0	**Value $** 0	**Balance owed $** 0			
Stock 0	**Value $** 0	**Bonds** 0	**Value $** 0		
Certificates of Deposit 0	**Value $** 0				
Other immovable property 0	**Equity $** 0	**Debt $** 0			
Bank account 0	**Value $** 0				

Name and location of bank:
Capital One

10. **Please list your monthly expenses:**

Rent 1600 Student	**Lot rent**	**House note**	**Gas**
Electric 200	**Water**	**Telephone** 90	**Cable**
Garbage	**Property taxes**	**House ins.**	**Med. ins.**
Medical expenses	**Dental expenses**	**Prescriptions**	
Life ins. 120 Monthly	**Car note**	**Car ins.**	**Transportation**
Food	**Barber/beauty**	**Entertainment**	**Child support**
Daycare	**Cleaning supplies/toiletries**	**Other**	

Support for children other than those of this marriage **Garnishment**

Credit cards (List type of card and monthly payment)

Discover	$ 15500	200	$
Mastercard	$ 4000	150	$
Visa	$ 2000	220	$
Visa	$ 1800	140	$

Loans (List the financial institution and the amount you pay monthly)

	$		$
	$		$
	$		$
	$		$

TOTAL MONTHLY EXPENSES $ 2820

11. **Does anyone regularly help you pay your expenses?** no **If so, please state that person's name and relationship to you** N/A

Do you have any additional income or assets that are not shown above?_____
If so, please explain N/A

12. **What arrangements have you made to pay your attorney's fee and what amount, if any have you paid? (You are required to answer fully.)**
Pro-Se

13. **Has your attorney explained to you that it is a crime punishable by imprisonment to intentionally give a false answer to any of the above questions?** yes

State of Louisiana, Parish of Calcasieu

BEFORE ME, personally came and appeared John C J. King SR
who after being duly sworn, deposed and said that:

(S)he is a citizen of the United States of America and is presently domiciled in and a resident of Louisiana.

(S)he is the person who furnished the information above; that (s)he has signed the petition; that the information is furnished to the court for the purpose of requesting permission to litigate the above captioned lawsuit without paying the costs in advance or as they accrue or furnishing security therefor.

That the foregoing petition and that all allegations of fact therein contained are true and correct; and that because of his/her poverty and want of means, (s)he is unable to pay the costs of court in advance or as they accrue, nor is (s)he able to provide bond therefor.

Applicant's Signature

NOTICE

Although you may be granted the privilege of proceeding without prepayment of costs, should judgment be rendered against you, YOUR STATUS AS A PAUPER DOES NOT RELIEVE YOU OF THE ORLIGATION TO PAY THESE COSTS.

The privilege to proceed *In Forma Pauperis* is restricted to litigants who are clearly entitled to do so, with due regard to the nature of the proceeding, the court costs which otherwise would have to be paid, and the ability of the litigant to pay them ro to furnish security therefor, so that the indiscriminate filing of lawsuits may be discouraged, without depriving a litigant of the benefit of proceeding *In Forma Pauperis* if (s)he is entitled to do so.

SWORN TO AND SUBSCRIBED BEFORE ME, a Notary Public in Hudson County
~~**Louisiana;**~~ **this** 30th **day of** July, **20** 24.
New Jersey

Notary Public

JAKE G MULRENAN
Notary Public, State of New Jersey
Comm. # 50215247
My Commission Expires 10/16/2028

THIRD PARTY AFFIDAVIT

BEFORE ME, personally came and appeared Shirley Jones King
who after being sworn, deposed and said that (s)he knows John C J King
well and that (s)he knows that because of his/her poverty and want of means, (s)he is unable to pay the costs of court in advance or as they accrue, nor is (s)he able to provide bond therefor.

Affiant

SWORN TO AND SUBSCRIBED BEFORE ME, a Notary Public in Hudson County, ~~Louisiana~~, **this** 30th **day of** July, **20** 24. New Jersey

Notary Public

JAKE G MULRENAN
Notary Public; State of New Jersey
Comm. # 50215247
My Commission Expires 10/16/2028

LEGAL SERVICES DECLARATION

BEFORE ME, personally came and appeared _____ **who is a duly authorized representative of Acadiana Legal Services Corporation or Southwest Louisiana Legal Services, or a pro bono program receiving referrals from one of the aforementioned organizations, states that** _____ **has produced evidence that (s)he receives public assistance benefits, or that (s)he has qualified to receive free legal services based on his/her income being less than or equal to 125% of the federal poverty level and therefore is entitled to a rebuttable presumption that (s)he is entitled to the privilege of litigating without prior payment of costs.**

_____
Legal Services Representative

ORDER

Considering the foregoing petition and affidavits:

IT IS HEREBY ORDERED that _____ **be permitted to prosecute or defend this litigation in accordance with Louisiana Code of Civil Procedure Article 5181, without paying the costs in advance or as they accrue or furnishing security therefor.**

Signed this chambers 13th **day of** Aug **20** 24 **in Lake Charles, Louisiana.**

~~JUDGE, 14th JUDICIAL DISTRICT COURT~~

Ronald C. Richard

A TRUE COPY
Date: 1-10-2025
Clerk

FAX COVER SHEET

TO	Attn Clerk of Court
COMPANY	
FAX NUMBER	13374911303
FROM	John King
DATE	2024-05-20 20:56:37 GMT
RE	King vs Amos 23-2124

COVER MESSAGE

Pauper Affidavit

Fax file fee already paid!

REC'D LC CITY COURT CIV
'24 DEC 19 PM2:29

IN RE: JOHN CLIFFORD J. KING

Lake Charles City Court

Calcasieu Parish, Louisiana

Filed 12-19-2024

~~Deputy~~ Clerk of Court

MOTION TO BE EXCUSED FROM HEARING

Now comes Oliver "Jackson" Schrumpf, attorney, individually, who respectfully shows:

1. On November 7, 2024, Movant enrolled as attorney for John King in the matter entitled John King vs. Rene Amos, No. 2023-2124, Lake Charles City Court.
2. The King vs. Amos matter was tried on November 14, 2024.
3. Judgment was signed in that matter on November 21, 2024 and Notice of Judgment was mailed by the Clerk on the same day.
4. An order granting a devolutive appeal of that judgment was granted on December 5, 2024.
5. In accordance with La. C.C.P. Art. 2088. Divesting of jurisdiction of trial court:

   A. **The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, ... on the granting of the order of appeal, in the case of a devolutive appeal.** Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following: (none applicable in this case).
6. John King has subsequently filed other pleadings in Lake Charles City Court and John King, and his wife, have been cited to appear in other matters not involving the Judgment subject to appeal. (Even if the wording of the pleadings filed by King was vague or ambiguous, or even if it intended to refer to the judgment in 2023-2124, regardless, the Court would not have jurisdiction to take any action on that particular matter because the jurisdiction of the Court is "divested").
7. Oliver "Jackson Schrumpf does not represent the John King or Shunte King in the contempt matters or any other matters other than the devolutive appeal in King vs. Rene Amos, No. 2023-2124.

8. On December 18, 2024, after e-mail exchanges by the Judge's paralegal and Oliver Schrumpf, the Court, Judge Ron Richard, called Oliver Schrumpf and, by telephone, ordered Schrumpf to appear at a hearing on December 30, 2024 at 9:00 AM. Schrumpf protested that he does not represent the Kings on the newly filed pleadings or on the contempt matters. Judge Richard, nevertheless said that the King pleadings sought recusal of the judge as to all judgments, which Judge Richard believes means even the judgment described in paragraph 3 above.

9. As attorney for John King in the King vs. Rene Amos, No. 2023-2124, Oliver Schrumpf here shows that the trial court's jurisdiction over that judgment has been divested and no action can be taken as to that judgment by the trial court.

Accordingly, Oliver Schrumpf requests the Court rescind its order for Oliver Schrumpf to appear on December 30, 2024 and excuse Oliver Schrumpf from appearing, reserving to John King the right to retain other counsel to represent him in that matter.

Respectfully Submitted By

SCHRUMPF LAW OFFICE,
A PROFESSIONAL LAW CORPORATION

BY: Oliver Schrumpf
OLIVER "JACKSON" SCHRUMPF
LA Bar Roll No. 11832
3801 Maplewood Drive
Sulphur, LA 70663
Tel - 337/625-9077
Fax-337-625-8231
oschrumpf@schrumpf-law.com

ORDER

Considering the foregoing Motion, let OLIVER "JACKSON" SCHRUMPF be excused from appearing at the hearing currently fixed for December 30, 2024 at 9:00 AM.

SIGNED in Chambers in Lake Charles, Louisiana, on this 26 day of December, 2024.

RON RICHARD, CITY JUDGE

Suit No. 23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a copy of the Motion To Be Excused From Hearing DENIED by Judge Ronald C. Richard has this 27 day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

CLERK

MINUTES OF THE COURT

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

DECEMBER 30, 2024

JUDGE RONALD C. RICHARD

Monica Abshire, Clerk

Arnold Bellow, Bailiff

Plaintiff, John Clifford J King, appears through attorney, Oliver Schrumpf

Defendant, Renee Amos Notary Public Notary ID# 29374 and Hartford Fire Insurance Company, appears through attorney Edward Bauman

COURT RULING:

The Court ruled that the four (4) motions filed by plaintiff John Clifford J King (not through his attorney) are fixed for hearing on Wednesday, January 15, 2025 at 9:00 a.m. and notice given to all parties in open court. The motions are: (1) Plaintiff's Emergency Motion to Recuse/Remove Honorable Judge Ron Richard; (2) Plaintiff's Motion to Vacate Retaliatory Judgments; (3) Plaintiff's Motion to Strike and Seal Identifying Information from Public Record; and (4) Plaintiff's Motion to Intervene to Prevent Further Judicial Harassment and Loss of Life.

The Court ordered plaintiff's counsel, Oliver Schrumpf, to provide the plaintiff's New Jersey address to be sealed in an envelope for the Court only. Upon review of the address provided by Mr. Schrumpf, the Court rescinds the order as the address provided is already in the record (plaintiff's address on N. Louisiana Avenue in Lake Charles, LA).

The Court *sua sponte* rescinds the Order granting plaintiff's *in forma pauperis* status retroactive to the day of granting same, or August 13, 2024.

A TRUE COPY
Date: 1-10-2025
Clerk

LAKE CHARLES CITY COURT
118 West Mill Street
Lake Charles, LA 70601

STATEMENT

January 7, 2025

John Clifford J King
vs. 23-2124
Renee Amos Notary Public Notary ID# 29374
and
Hartford Fire Insurance Company

Transcript of testimony of hearing on December 30, 2024
Judge Ronald C. Richard

31 pages $ 170.50

paid in full
MA

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING Plaintiff	*	
VERSUS	*	NO. 23-2124
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 Defendant	*	

* *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 30th day of December 2024, beginning at 9:00 a.m.

APPEARANCES

FOR THE PLAINTIFF,
JOHN CLIFFORD J KING:

OLIVER SCHRUMPF
SCHRUMPF LAW OFFICE, APLC
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663
(337) 625-9077
EMAIL: oschrumpf@schrumpf-law.com

FOR THE DEFENDANTS,
RENEE AMOS NOTARY PUBLIC
NOTARY ID# 29374
and
HARTFORD FIRE INSURANCE COMPANY:

EDWARD K. BAUMAN
1801 RYAN STREET
LAKE CHARLES, LA 70601
(337) 491-0570
EMAIL: ed@lakecharlesattorney.com

* * *

PROCEEDINGS

* * *

COURT CALLED TO ORDER

* * *

THE COURT:

Good morning everyone.

MR. SCHRUMPF:

Good morning Judge.

MR. BAUMAN:

Good morning Your Honor.

THE COURT:

Before we start court, I would love to recognize the incredible Miss Lois. Today is her 80th birthday. Miss Lois, my intention, uh, since we had to drag y'all in today for this special fixing, my intention was to take you to lunch somewhere fancy but in light of Marshal Alcede's funeral, I would ask that if I could take you to lunch maybe later this week. All right. Okay. Calling the matter of ... let me get my binders unclipped ... the matter of, uh, John Clifford King ... good Lord, I can't find

one good style on this thing. Hold on. John Clifford King versus Renee Amos and The Hartford Insurance Company, docket number 23-2124. I have called, sort of, this ... this quickie hearing to address a couple of matters. This case was ... the trial in this matter came before this court back on what date madame clerk?

CLERK:

14th. November 14th.

THE COURT:

November 14th? On November 14th trial was had in this matter. Immediately thereafter, a hearing on contempt was had with regard to Mr. King and having said all that and having the history in place, let's go ahead and have appearances from counsel and then we'll discuss the matter. I believe we have new counsel on board for ....

MR. BAUMAN:

That's correct Your Honor. Ed Bauman and I will be enrolling on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

Okay. I believe I signed, uh, a motion with the other lady ...

MR. BAUMAN:

Yes. You did Your Honor.

THE COURT:

I can't remember ... I just ... her name slips ...

MR. BAUMAN:

Kamie ...

THE COURT:

Kamie. Miss Kamie. Uh, she withdrew and you're enrolled, correct?

MR. BAUMAN:

Correct.

THE COURT:

Okay. Good deal. All right, go ahead Mr. Oliver. Make your appearance.

MR. SCHRUMPF:

I'm Oliver Schrumpf and as you know, I represent John King in the matter which is on appeal now and this Court has no jurisdiction to do anything on that case.

THE COURT:

Uh, well, we'll talk about that, all right?

MR. SCHRUMPF:

Okay.

THE COURT:

I ... I tend to ... tend to agree with you initially that, uh, appeal gets filed and we send it all up to the Third Circuit and we let them take care of things, but I want to clarify something real real quick. On ... at trial, uh, and before trial, I made it very clear to your client Mr. King that there had been a history of multiple filings, letters, phone calls, contact, various things, with the judge's office. He, uh, ultimately retained you and I cautioned him then as well as yourself that as he has counsel and is represented, all pleadings are to be filed through you, okay? That's why we have lawyers in the case. I also will note for the record that at ... at the trial of this matter, we had the trial, and then immediately subsequent to trial, we held

our rule for contempt with regard to various behaviors of Mr. King. The ... unfortunately, you advised the court that you were not retained to represent him with regard to the contempt matter and you existed the courtroom sir.

MR. SCHRUMPF:

Absolutely.

THE COURT:

Uh, and since that time, Mr. King's efforts at filing things with this court have continued okay? As you well are aware and you've been copied on this and opposing counsel was not copied on these filings and pleadings that were, I believe, made on December 12th, okay? And the reason I'm taking this rather unusual action of having us here today to talk about the matter is that, uh, on December 12th Mr. King filed various motions with the court which I believe you have copies of. Am I correct counsel?

MR. SCHRUMPF:

I was copied on the email.

THE COURT:

Okay. And, uh, we all agree that opposing counsel, Miss Kamie at the time, was not copied.

MR. SCHRUMPF:

I don't know.

THE COURT:

Well, if you look at his emails, she wasn't, okay? You were. I was and madame clerk was but opposing counsel was not copied. Once again, this leads to more confusion about all parties not being properly advised as to what's going on in the matter. Specifically, he filed motions entitled Emergency Motion to Recuse / Remove Honorable Judge Ron Richard; Motion to Vacate Retaliatory Judgments; Motion to Strike and Seal Identifying Information from Public Record; Motion to Intervene to Prevent further Judicial Harassment and Loss of Life. Once again, in those motions making the very substantially similar statements that led to the contempt rule in the first place. Now, I will admit Mr. Schrumpf, you caught me off guard when you

said, I don't represent this gentleman with regard to contempt and you walked out the courtroom. There was so much going on that day due to the behavior of your client and quite frankly, his wife, that it caught me off guard. In hindsight, I would have instructed you to remain in the courtroom and advised you that you signed on to represent the guy and if you represent him, you can't just bifurcate the representation on his actions with regard to the court and I would have required that you stay for the matter of the rule for contempt, okay? Now since this filing of December 12th that he has made, the glaring confusion and chaos created by a lawyer saying, I represent the guy but not in everything in this case, has become more apparent, okay? And so I am instructing you now that you represent him in this docket number, okay? And I am going to set everything he filed. I'm going to set for hearing and I'm gonna give notice to everyone in this courtroom of that hearing date and we're gonna come

back and have a hearing on it. The reason I'm not having a hearing on these things today because I think we had to get out of the way first, who's who. Okay, who's driving the ship? And you're either driving that ship or you're not driving that ship. This isn't a family matter where one lawyer takes over property settlement issues that come after custody and child support and all those sorts of things. This is the matter and in the very matter, he is continuing his behavior that is causing much chaos and confusion with the actual legal process. All right? I am setting the matter for January 15th at 9 a.m. You can have your client here or not. I prefer that all parties be here. All parties are entitled to be here. I am instructing everyone to have their clients here, all right? But, we're gonna have a hearing on these matters that day.

MR. SCHRUMPF:

What ...

THE COURT:

... now I want to ...

MR. SCHRUMPF:

... what is being said ...

THE COURT:

... hold on one second.

MR. SCHRUMPF:

Okay.

THE COURT:

One of the reasons why I'm having to take this extraordinary action is that in Mr. King's motion that he filed himself without you, his lawyer, he makes again statements allegedly accusing this court and its staff of improper behavior. In fact, on January, I believe it was 12th, uh, I mean I'm sorry, December ... I'm already jumping to next month. I'm just hoping. On December 12th, uh, when these motions were filed, Mrs. King had either that day or immediately before, called this courthouse, got Miss Kay Bang on the phone who is the paralegal that basically runs upstairs for us and advised her that my behavior and her behavior had led to the murder of a man in Iowa, Louisiana on December 11th and that there were, uh, a

quote/unquote, white man went her in-laws house looking for her due to me, uh, this court putting this case on PACER. Let the record reflect PACER is a federal court record retention filing service. Nothing from Lake Charles City Court would be available on PACER, whatsoever and that this gentleman was shot six (6) times and killed in Iowa and that me and Miss Kay Bang are responsible for that. And then on top of it, that it was such a big deal, three (3) police helicopters were circling that part of Calcasieu Parish to locate the man. Okay? I'm giving you some background as to why we gonna get who's who running the ship on each side here. All right? I will just note for the record that I have verified, and my staff has verified, through law enforcement in Calcasieu Parish, that there were indeed no murders in Iowa, Louisiana on December 11th or according to one of the chiefs at the Sheriff's Department, no murders in Iowa at all this year. All right? And the closest police helicopter to be used in

... in Louisiana with relations to Lake Charles would be Baton Rouge and I don't believe we have three (3) of them. Okay? It's that kind of behavior that is necessitating me having a hearing on these issues but having me do what I'm doing today which is to say, we're having the hearing and you're they're lawyer. You're his lawyer. Okay? That's the order of the court. Now, in another matter, another issue, as you're aware, there is currently a rule of contempt that has been filed for this, noticed by this court with regard to Mr. King's wife, Mrs. Shunte King and, uh, service with regard to that rule, uh, this being due to her calling ... illegally calling 9-1-1 in the middle of the trial and having EMTs show up in this courtroom concerned that someone was having ... they had been told that someone was having a seizure in the courtroom which was all a complete lie and a complete fabrication and untruth. The addresses provided by your client, both on Louisiana Avenue, Simmons Street, and the Iowa address have

all come back as, she does not live there, neither does he, although that's the information provided. Now, Mrs. King made certain assertions, uh, both in various writings, phone calls and on the stand in the trial wherein you were counsel, that there is some ... some very important reason as to why she is in witness protection or something of that nature and her ... her personal information should not be provided to the public or put in a public record due to, uh, some bad people wanting to get her and, uh, our understanding is that is what she alleged happened December 11th. That we released her whereabouts, or her contact information, and these ... this bad man showed up at her in-laws house in Iowa, Louisiana and a death resulted, all of which we have established is completely not true. So what we have here is your client filing things with the court; his wife calling the court making statements; this court unable to serve her with regard to that because the addresses they have

provided locally are indeed not valid. So, I am ordering you, and you may do this under seal and no one will see this. I want to be very clear. It will be placed in the record under seal. I am ordering you to provide the address of Mr. King at his home in New Jersey. This court, I will tell you right now, intends to have her served through Long Arm Statute.

MR. SCHRUMPF:

I'm sorry. Say that again please.

THE COURT:

This court intends to have her served through Long Arm service. Okay? I'm ordering you to provide that today before you leave the courtroom.

MR. SCHRUMPF:

If I have it.

THE COURT:

You have an address for him. You have received payment from him. You have it. This court is done with people playing coy with the rules and with the law. This is the way it works. People get

a lawyer or they don't get a lawyer. They come to court. They state their case. If they win, they win. If they don't like it, they appeal. This is how it works but the kind of behavior that has been exhibited here will not be allowed and this court and it's staff being accused of being involved in a murder will not be allowed. Period. Now, having said my peace and what I have ordered to be done, the court can hear you.

MR. SCHRUMPF:

The court will what?

THE COURT:

Will hear you.

MR. SCHRUMPF:

Judge, I did not prepare the motions that were filed by Mr. King. I did not ...

THE COURT:

... I agree with you.

MR. SCHRUMPF:

... get counsel from it. I didn't know it was gonna be filed.

THE COURT:

I believe you.

MR. SCHRUMPF:

And I ... I have nothing to do with those motions.

THE COURT:

I believe you.

MR. SCHRUMPF:

Okay.

THE COURT:

One hundred percent (100%). I do not think that you have been involved in any of this behavior. I think you have the reality of a client who is probably not listening to what I believe would probably be your very good advice. I ... I ... you are very well respected by me. I have always believed you to be an upright and intelligent and very capable attorney, uh, and I simply am going to require that, since you're the attorney on this case, you're the attorney for everything on this case with regard to Mr. King, okay? Now, so, my order is that's when the hearing on all of these things he filed, unless he

withdraws them before that date, okay? That's ... I guess that resolves that matter.

MR. SCHRUMPF:

Unless what?

THE COURT:

Unless he withdraws them before that date, we're gonna have a hearing on those matters on that date, okay? I am ordering that you provide his home address. It will be placed under seal. Mr. Bauman, we've sort of ignored you. My apologies. Do you have anything you wish ...

MR. BAUMAN:

... quite all right, Your Honor.

THE COURT:

... to say?

MR. BAUMAN:

Just absorbing it all in.

THE COURT:

Okay. Now, having said all that, we do have one other matter that needs to be addressed. I granted, back on

August 13th of this year, I had granted pauper ... I granted pauper status to Mr. King. Now, this came after he had made multiple attempts at achieving pauper status and I had denied them each time simply because there was no affidavit attached, or there ... whatever. Things weren't filed in the record. Anyhow, it was just procedural stuff and quite frankly, I wasn't denying it based on any of the information he placed in it, it just wasn't procedurally correct so we would deny it, send it back and say hey you need, one two three, or whatever it was. In August, I received his pauper status request and, uh, and it looked procedurally right so I signed off on it and I granted pauper status. Okay? Subsequent to that, he hired counsel and in fact, in one of his hearings subsequent to me granting pauper status, he advised that he spent twelve thousand dollars ($12,000.00) on lawyers in this past year, okay? Information which he did not place in the pauper affidavit and which would

have been a ... a very relevant piece of information to me in granting pauper status because if you've got twelve (12) grand to hire lawyers, then you can pay the court costs in City Court. Having recalled that and after he made that statement, I actually went back and took a look at the pauper status, uh, pauper request and I noticed something else that, uh, I am rather embarrassed that I missed, but I just don't know if I didn't remember the wife's name or whatever, or if I really knew, but, uh, and I'll provide this for everyone in the courtroom to look at. But, the ... as you well know, any pauper affidavit must be accompanied by a third party affidavit by someone who knew he person, knows their situation and can say, uh, I know Lois and she's, uh, hadn't worked in ten (10) years, and whatever. And I can say speak some truth to her assertion that she is a pauper. And of course, a third party would be, in my case, Mr. Bauman or you would be a third party to me. You're not married to me. You're

not my first cousin or you know, whatever, my dad or ... etcetera. However, in reviewing this, I realized that the third party affidavit was executed by Mr. King's wife, Shunte King. Okay? Now, uh, I did not realize at the time that was his wife, uh, and when everything's written in cursive, it's kind of open to some interpretation but going back and taking a good look at it, I realized, uh, that she did that. That would of course be improper and would make the affidavit null and void because it's not executed by a third party. It's executed by his wife. She's not a third party. Not only is she not a third party, she's such a close party that Louisiana law would require that we couldn't even make her testify against him because of spousal privilege. The very nature of being a third party would mean no privilege there. So, this Court will sua sponte rescind the order for pauper. It is not procedurally correct. It is not properly done. It is therefore not a legal filing and so the court is gonna order

that the pauper status be rescinded retroactive to the date of granting and the court would caution everyone to be mindful in any statements made in any, uh, future such motions, uh, because a statement of having twelve thousand dollars ($12,000.00) to spend on lawyers means you got a couple hundred dollars to spend on court costs. Anyhow, all right ...

MR. SCHRUMPF:

Judge, I ... I ... as the ... since I am their attorney, at this point I have to say that this Court has no jurisdiction to take the action you just ordered under Code of Civil Procedure Article 208a, there are certain things that the court can do ...

THE COURT:

... uh huh ...

MR. SCHRUMPF:

... after the appeal has been granted.

THE COURT:

Right.

MR. SCHRUMPF:

And that's not one of them.

THE COURT:

But you ... your problem here sir is that your client continues in the behavior. Your client can't keep invoking the jurisdiction of this court and then claim that this court has no jurisdiction. There has to be consequences for continuing to involve. So what I suggest is, shall I speak bluntly? Get a grip on your client and tell him to stop. Okay? Because as long as he's gonna file things here, this court's gonna have jurisdiction. Okay? You don't get to say, oh, I'm appealing it and therefore I can just do and say whatever I want to this court. I can make whatever allegations, assertions I want regarding this court. I can file things in the record. I can continue to obey court orders and if you think that the Code of Civil Procedure in any way, shape or form allows for this kind of behavior and then you get to hide behind, I filed an appeal, I beg to differ.

Okay. That is not what it meant. I'm not able to make any rulings generally. I can't go back and redo things. I can't undo things. I can't ... there's all sorts of things I shouldn't be able to do except he keeps addressing the court and filing pleadings and his wife continues with her contemptuous behavior. Okay? And so, I don't like doing this. I don't know what the right thing is to truly do but I know that this behavior's gonna stop one way or the other, period. We're not gonna have this. Anything Mr. Bauman?

MR. BAUMAN:

No Your Honor.

THE COURT:

All right. Mr. Schrumpf ...

MR. SCHRUMPF:

I will see ...

THE COURT:

Do we have an envelope Miss Bang? Somebody get me an envelope. He's gonna put the address in the envelope. It's gonna be sealed and tendered to the court. This information will not be

revealed to anyone other than immediate court staff or, uh, or deputy marshals who are involved in the Long Arm Service process regarding Miss King.

MR. BAUMAN:

Your Honor, I'm filing a motion to enroll with the Third Circuit regarding the appeal.

THE COURT:

Yes sir.

MR. SCHRUMPF:

And ... and Judge, there's no jurisdiction to sign any kind of order. And, I ... I went through this in Allen Parish trying to enroll in a case where someone had taken an appeal and it was denied. I couldn't even enroll in ... because that's not one of the things allowed.

THE COURT:

He's ... he's enrolling in the Third Circuit I believe he just said.

MR. BAUMAN:

Yea.

THE COURT:

He's not enrolling here.

MR. SCHRUMPF:

Oh okay. In the Third Circuit?

THE COURT:

Yea. Once again, uh, your clients have made this difficult situation putting me, you and all parties in a difficult mess. And I'm stuck with trying to find a way to handle this behavior. Give that to Mr. Schrumpf please so he may ... and give him a, uh, he's got a note pad if he can just tear a piece of paper, write the address, put it in it. It'll be returned to me and sealed per my order. Mr. Pete, if you will provide me that, then I'll seal it.

MR. SCHRUMPF:

Judge, you should look at this right now before I leave. That's the address I have in my file.

THE COURT:

Okay. This address is an incorrect address that ...

MR. SCHRUMPF:

... well, that's what you're telling me. That they're not ... you said you tried serving them and they can't be served there. As far as I know ...

THE COURT:

Let me be very clear ...

MR. SCHRUMPF:

... he lives in New Jersey.

THE COURT:

Let me ... let me be very clear. I haven't tried to serve anybody. The Marshal's Office, in doing their lawful duties, has made service, attempted service at three (3) addresses provided by your client. Okay? None of those addresses are where your client actually resides, okay? Your client testified in court that he resided in New Jersey.

MR. SCHRUMPF:

Yes sir.

THE COURT:

His wife testified to that as well, all right? I, due to her statements that she was in witness protection, I did

not require that she provide any information on the record, okay? So, I want to make very sure ... very clear here, you as an officer of the court are telling me that you do not know or have an address where they live in New Jersey?

MR. SCHRUMPF:

I do not have their New Jersey address, correct.

THE COURT:

Okay. All you have is this one?

MR. SCHRUMPF:

This is his address in my file but I used ... all communications have been by the email address which I provided to ...

THE COURT:

... well that's how they're ... that's how they're cooperating with this court. I'm just unaware of any way to do service via email, okay? This is being placed into the record. It's not being sealed because it's the address that's already in the record. I'll see you on the

15th Mr. Schrumpf.

MR. SCHRUMPF:

Okay.

MR. BAUMAN:

Thank you, Your Honor.

THE COURT:

Thank you gentlemen. Court's adjourned.

* * *

END OF HEARING

* * *

STATE OF LOUISIANA :

PARISH OF CALCASIEU :

REPORTER'S PAGE

I, **Karey J. Bang, Certified Digital Reporter (1072019)** for the Lake Charles City Court in and for State of Louisiana, do hereby state on the Record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) and/or ellipsis (…) have been used to indicate pauses, changes in thought, and/or talk-overs; that same is the proper method for a Court Reporter's transcription of proceeding, and that the dashes (--) and/or ellipsis (…) do not indicate that words or phrases have been left out of this transcript.

Lake Charles, Louisiana; January 7, 2025.

KAREY J. BANG
Certified Digital Reporter

STATE OF LOUISIANA :

PARISH OF CALCASIEU :

REPORTER'S CERTIFICATE

I, Karey J. Bang, Certified Digital Reporter (1072019) for the Lake Charles City Court in and for State of Louisiana, do hereby certify that this testimony was reported to Shelia Hasty in the digital reporting method, was prepared and transcribed by me or under my direction and supervision, and is a true and correct transcript to the best of my ability and understanding; that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board, or by the Supreme Court of Louisiana, and that I am not related to counsel or to the parties herein, nor am I otherwise interested in the outcome of this matter.

Lake Charles, Louisiana; January 7, 2025.

KAREY J. Bang
Certified Digital Reporter

LAKE CHARLES CITY COURT
POST OFFICE BOX 1664
LAKE CHARLES, LA. 70602

ESTIMATED COST OF DEVOLUTIVE APPEAL

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

COURT COST TO DATE----------	$ 2,228.80
COPIES OF EXHIBITS AND PLEADINGS----------	$ 2,668.00
TESTIMONY – COURT REPORTER (TYPING OF TRANSCRIPTS) -	$ 712.50
HON. RENEE R. SIMIEN, CLERK, COURT OF APPEAL----------	$ 341.00
POSTAGE FEE----------	$ 10.08
Subtotal	$ 5,960.38
Minus Transcript Prepaid	($ 712.50)
Minus Court Cost Deposits	($ 1,000.00)
TOTAL DUE	$ 4,247.88

MAILED TO APPELLANT
CERTIFIED MAIL, RETURNED RECEIPT REQUESTED

THIS 12th DAY OF DECEMBER 2024

APPELLANT:

JOHN CLIFFORD J KING
THRU OLIVER SCHRUMPF
SCHRUMPF LAW OFFICE
3801 Maplewood Drive
SULPHUR, LA 70663

Make Check payable to Lake Charles City Court Under **Article 2126, La. C.C.P. all estimated costs of the appeal must be paid to the Clerk within 20 days.**

COPY

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING Plaintiff	*	
VERSUS	*	NO. 23-2124
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 Defendant	*	

* *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 14th day of November 2024, beginning at 11:00 a.m.

APPEARANCES

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P-2 Copy of ID of Charmaine Colston 19

P-3 Copy of front of Vehicle Title 28

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DEFENDANTS' EXHIBITS:

None

PROFFERS

BY PLAINTIFF:

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Copy of CrossFit check-in dated 9-7-21 (previous marked as plaintiff exhibit 4) 30, 114

Proffer-2
Copy of CrossFit check-in dated 9-8-21 (previous marked as plaintiff exhibit 5) 34, 114

Proffer-3
Affidavit of CrossFit (previous marked as plaintiff exhibit 6) ... 38, 114

Proffer-4
Copy of Bank Statement (previous marked as plaintiff exhibit 7)... 43, 114

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* * *

PROCEEDINGS

* * *

COURT CALLED TO ORDER

* * *

THE COURT:

Good morning everyone. We have a number of things on the docket. I'm gonna try to move the, what I would call the quickie stuff, uh, and so I believe we have an eviction matter on the docket.

* * *

OTHER MATTERS CALLED

* * *

THE COURT:

All right. You may be seated. All right, counselors do we have everybody here? Do we ... I'm gonna call the matter of John Clifford J King versus Renee Amos, docket number 23-2124. Looks like we all have counselors here. All right, counselors make your appearance and then we'll have the witnesses sworn in.

MS. DOMINIC:

Good morning Your Honor. Kamie Dominic

on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

All right. Oliver?

MR. SCHRUMPF:

Oliver Shrumpf for John Clifford King.

THE COURT:

All right, now, Miss Amos, please raise your right hand. Mr. King, uh, you stay seated. I know you got your back. Raise your right hand, let's get you sworn in. Oh whoa, whoa, we got another witness. Any other witnesses in here? You a witness sir?

MS. DOMINIC:

No.

THE COURT:

Where's Ms. King?

MR. SCHRUMPF:

Ms. King is outside.

MR. KING:

In the lobby.

THE COURT:

Let's ... let's grab her real quick. We'll just get everybody sworn in at one time and that way we get it knocked out.

MS. DOMINIC:

And Your Honor, and then any witnesses besides Mr. King and my client, ask to be sequestered from the courtroom.

THE COURT:

Okay. No problem. No problem. We gonna do that and I can give them the sequestration speech when they come in. Just FYI, my staff, uh, we have ordered lunch and we will eat right through trial, uh, because I think we can move this along rather quickly. But, we hadn't had breakfast since 6:30 and we hungry. All right, now we got her in here ... all right, ma'am give us your full ... well, let me get you sworn in first and then we can ... all right, everybody raise your right hand.

(THREE WITNESSES SWORN)

* * *

RENEE AMOS

JOHN CLIFFORD J KING

SHUNTE KING

* * *

Witnesses called on behalf of the plaintiff, John Clifford J King and on behalf of the defendant, Renee Amos Notary Public

Notary ID# 29374, having been duly sworn by the Deputy Clerk of Court, were examined, and testified on their oath as follows:

THE COURT:

All right. So, I've got them, uh, uh, notified ... ma'am, give us your full name for the record real quick. Just speak loudly towards the microphone.

MRS. KING:

My name is Shunte Jones King.

THE COURT:

All right. Good deal. All right, Ms. King, what we're gonna do is, uh, he's a witness, she's a witness, but they're also parties so they get to stay in the room. You're a witness ... are you a witness? Okay, so, uh, you're gonna be put under what's called the rule of sequestration. That means you got to sit outside in the lobby and hang out until it's ... you're called to get on the witness stand. After you get on the witness stand and they're done with you, then you get to stay in the courtroom, okay? So you're gonna have to just take a seat outside and hang out until they call you in.

MRS. KING:

I'm supposed to bring something to your attention. I'm required by law, uh, by the state attorney general to ...

THE COURT:

Not right now. We'll do that when I bring you in, okay?

MRS. KING:

Okay.

THE COURT:

The rule of sequestration is in effect. Please remove yourself to the lobby. All right. All parties may have a seat. Now, uh, Mr. Schrumpf, you're the moving party with the plaintiff. So, uh, the ball is in your court and the way we're set up here with minimum number of witnesses, uh, I suggest we just keep everybody in their seats. Makes it easier, plus I don't want Mr. King having to come up and down where the witness stand is, okay? And just everybody remember, speak to the microphone. Mr. King, you got to get it to the microphone. Ms. Amos, got to get it to the microphone, okay? All right, go ahead Mr. Schrumpf.

MR. SCHRUMPF:

Your Honor ...

THE COURT:

... Any pretrial matters we need to address?

MR. SCHRUMPF:

Did you receive the pretrial memo that I sent?

THE COURT:

I did. I've received your pretrial memorandum.

MR. SCHRUMPF:

Okay.

THE COURT:

I've reviewed it ...

MS. DOMINIC:

And Your Honor, at this time, I would like to object to certain things that's in the pretrial brief. I wasn't ... my understanding it wasn't required of the Court ...

THE COURT:

It was not required.

MS. DOMINIC:

But I do ... oh so sorry.

THE COURT:

Get that mic. Sorry.

MS. DOMINIC:

Sorry. As I was saying Your Honor, I would like to object to certain things that's in a pretrial brief. As I ... as I mentioned, it wasn't a requirement of the Court but I am requesting, uh, to the Court to strike the mention of the fifteen thousand (15,000) purchase price from the pretrial brief due to lack of supporting evidence. Uh, the fifteen thousand (15,000) was due to the purchase ...

THE COURT:

.. let me, let me ...

MS. DOMINIC:

... alleged purchase price.

THE COURT:

Let me cut you off real, real quick. The pretrial brief is not evidence.

MS. DOMINIC:

Okay.

THE COURT:

It is not considered as such. I don't think it was actually even filed into the record. It was just provided to the Court 'cuz

that's what pretrial briefs generally are done. I'm sorry ma'am. I'm not worried about the pretrial brief. It don't mean anything to me one way or the other. It's just one side's way of kind of saying, hey here's what we're gonna do and here's what we think. It's got to get on here under oath before it means squat diddly to me, so don't ... I'm ...

MS. DOMINIC:

Yes Your Honor.

THE COURT:

... I'm just going to disabuse you of your concerns. You don't have to worry about that.

MS. DOMINIC:

Thank you Your Honor.

THE COURT:

Okay. So don't ... don't sweat that. Do we have any other pretrial matters? Any agreement on evidence? Anything of that nature?

MS. DOMINIC:

No Your Honor.

THE COURT:

You don't' have anything? Okay, well

let's get this party started. Go ahead Mr. Schrumpf.

MR. SCHRUMPF:

I'd like to call Renee Amos under cross examination.

THE COURT:

Okay. Now, Ms. Amos let me ... your lawyer will tell you this but let me give you sort of the quickie protocol. He's calling you as a witness under what's cross examination. He's not calling you under direct examination. That means he basically gets to treat you as a hostile witness in the sense of he gets to ask some leading questions and he gets to do things a little differently than he would be allowed to do, say with his own client, under direct examination. So, listen to the question. Answer the question to the best you can. If you're unsure, you have counsel. Look at counsel, uh, and I caution both sides. If you're testifying in any way Ms. Amos or Mr. King and your lawyer starts talking, quit talking all right? He's trying to, she's trying to do her job. Be quiet and let them do their job, okay? All right. Go ahead.

MR. SCHRUMPF:

May I approach?

THE COURT:

Yes sir. Thank you Ollie. It'd be nice if the judge can see some stuff.

MR. SCHRUMPF:

I'm gonna do it.

THE COURT:

Merci bon. Let me see ...

* * *

RENEE AMOS

* * *

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on her oath as follows:

* * *

CROSS EXAMINATION

BY MR. SCHRUMPF:

Q. Ms. Amos, please state your full name.

A. Renee Amos.

Q. And, what is your address?

A. I beg your pardon.

Q. Your address?

A. 1208 17th Street, Lake Charles, Louisiana.

Q. Are you a Louisiana Notary?

A. Yes, I am.

Q. Notary number 29374?

A. Correct.

Q. And you furnished a bond as required by law?

A. Yes.

Q. To be a notary? Do you have any additional insurance besides the insurance bond?

A. No, I do not.

Q. Do you know Charmaine Colston?

A. I'm aware of the name. I do not have a relationship with her.

Q. On September 7, 2021, did you do notary work for Charmaine Colston?

A. On September 7th of 2021, per the back of this title, that is my signature but I would also say ... I would stipulate that and explain there were two (2) people present.

Q. So is Exhibit 1 the, uh, notary work that you did on that date, September 7th 2021?

A. This is what you're talking about?

Q. Yes ma'am. I've labeled it Exhibit 1.

A. Since there's not a front of it, I do not see the front of the title, but it is my signature, so ...

Q. I have ... I have the front. It's coming up ...

A. Well, I don't see the front so this is my signature, if that's what you're asking.

Q. Okay. I offer Exhibit number 1 Your Honor.

THE COURT:

Okay. I'm ... and I'm trying to see where everything is too. I see a Charmaine name. I see a P.O. Box. I see a Charmaine (indiscernible) maybe ... I'm ... I'm trying ... and it's just so dad-gum blurry, I'm trying to figure out what it ... what it's saying.

MS. AMOS:

Uh huh.

THE COURT:

Where is ... oh, I see Ms. Amos' signature, uh, okay, all right, I got that part down. All right. Any objection counselor to the introduction of this into evidence as Plaintiff 1?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it will be admitted as Plaintiff 1. There you go Madame Clerk.

BY MR. SCHRUMPF:

Q. And the import of Exhibit 1 is a transferred title from John King to Charmaine Colston?

A. That is what it indicates, yes.

Q. Okay. And you kept an ID for that transaction, did you not?

A. My practice is to check the IDs of all parties, the buyer and the seller.

Q. And, I've shown you exhibit 2. Is ... exhibit 2 is the ID that you had for that transaction?

A. I cannot see the ID. I see the name of Charmaine Colston, so I will make the assumption that this is in fact her ID although it's not legible.

Q. Okay. I offer Exhibit 2 Your Honor.

THE COURT:

All right, subject to our identification issues, I think we all agree that that's the ID or driver's license or something. Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it'll be entered as Plaintiff 2.

BY MR. SCHRUMPF:

Q. Those documents were obtained by the Calcasieu Parish Sheriff's Office? Did ... did they get them directly from you?

A. No ma'am, no sir.

Q. I see there was no ID attached for John King.

A. I do not have a duty to keep copies of IDs. I check the ID and validate it when they're in my office. I would not have a copy of Mr. King's ID nor Ms. Colston's ID for that matter.

Q. And John King, uh, you have no ID for him from September 7th 2021?

A. I beg ... ask that question again. I'm sorry.

Q. You do not have an ID showing that John King was present on December ...

A. ... I ...

Q. ... September 7th 2021?

A. On September 7th 2021, per my practice, I would have seen the ID of John King as the purchaser, as the seller excuse me, and Charmaine Colston as the, uh, as the purchaser, but I do not have copies of those IDs.

Q. Do you know John King?

A. I do not know him.

Q. Would you recognize John King if you saw him?

A. The first time I ... I would ... I don't ... I saw

him that one (1) time in my home. Would I have recognized him if I had not seen him in this courtroom previously, no sir I would not.

Q. It's your testimony that two (2) people showed up on September 7th 2021. One of them was Charmaine Colston. Did you identify John King?

A. My testimony is that I identify the buyer and the seller. Two (2) people showed up. I identified Ms. Colston and I identified Mr. King. I had to have identification. That identification could have been an ID, a driver's license, in some cases a passport, but both parties were properly identified before I proceeded.

Q. Ma'am, was the title ... the back of that title already signed by someone before Ms. Colston came in with it?

A. No. The title was blank on the back. My ... my policy is to look at the title. I look at the front of the title first to make sure who the sellers are. Sometimes there are more than one sellers. I then turn the title on the back. Had there been a signature on the back, I could not have proceeded.

Q. It would have been wrong to notarize it if it had already been signed, correct?

A. If it was ... if it was already signed, I would

have ... if it was signed by Charmaine Colston I would have identified her and asked her why she signed it. If it was signed by John King, I would have validated that, but there was no signature on the back of the title. In those instances, the next thing I would have done if I had some suspicion was I would have gone to the Justice of the Peace. So, I would not have proceeded if I saw anything wrong.

Q. So you have an excellent memory of what occurred on that date?

A. I do not have a memory of what occurred on that date. That's been four (4) years ago. I do have an excellent memory of my process and procedure and my process and procedure does not change.

Q. This says that the consideration was one hundred dollars ($100.00)?

A. Sometimes when people do not want to do donations, they put a small price on it. What price they tell me that they pay is the price that I put in there. I have no obligation and no ... I do not have to watch money transfer. I ask what they paid. That is not part of what I am required to do. I am required to validate identification.

Q. So you did not see the hundred dollars ($100.00) transferred?

A. I cannot remember.

Q. Was it a check?

A. I do not know sir. They could ... I have no idea how they transferred it. It's very possible they transferred money in front of me but I do so many of these, uh, often times money is transferred, yes, and I'm not involved in that. I don't count it. I don't have anything to do with that. Not my job.

Q. Ms. Amos, would you agree that if John King was in New Jersey on September 7th 2021 that he could not have been the one that signed that document?

A. I have no idea, uh, I will not agree or disagree with that. I'm going to say that someone was in my residence on that day representing themselves as John King. I looked at a driver's license, identified it.

Q. But you did not keep a copy of the driver's license of the person that said he was John King?

A. Sir, I don't keep any driver's license. The massive amount of people that I see in a day, I could not possibly keep those records. I identify them and I move on.

MR. SCHRUMPF:

I tender the witness.

THE COURT:

All right. Ma'am, I guess if you wish

to, uh, do some directing and some follow up on his cross, go ahead.

MS. DOMINIC:

At this time Your Honor, I will waive that and wait, uh, to do my ... I'm sorry, call of chief ... chief of ...

THE COURT:

Call your case in chief?

MS. DOMINIC:

... to call my case in ...

THE COURT:

I hear you. I got you, okay. All right, thank you ma'am. I ... I want to commend you. You're doing ... you ... you talk into the microphones. That is a big deal, y'all. Keep it up. It helps Madame Clerk. It's hard on the lawyers and I guess maybe we need to get body mics before it's over with 'cuz the lawyers need to move around. They don't want to use you deputy, I don't know. You can hand them to the deputies and they'll do all the transporting around that way you don't have to ... to scurry.

MR. SCHRUMPF:

Yes, okay.

THE COURT:

And deputies, feel free to step up to get the stuff. You don't have to wait for him. I get it. The Marshal likes that process. I like that process. It keeps things orderly.

MR. SCHRUMPF:

Judge, I'm want to call John King.

THE COURT:

All right. All right, Mr. King, you are on the witness stand even though you're sitting in your seat, okay?

MR. KING:

Yes sir.

* * *

JOHN CLIFFORD J KING

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on his oath as follows:

* * *

DIRECT EXAMINATION

BY MR. SCHRUMPF:

Q. Please state your name.

A. John Clifford Joseph King, Sr.

Q. And where do you reside currently?

A. I am a resident of Louisiana, but I'm currently in, uh, New Jersey due to my wife ...

THE COURT:

Louder.

A. I am currently ...

THE COURT:

There you go.

A. I am a resident of Louisiana. I am currently living in New Jersey with my wife. She is a dual resident of New Jersey and Texas. She owns her house.

Q. How long have you been living in New Jersey?

A. I initially got my contract, uh, to go to New Jersey November of 2020 and, uh, I've been working ... well, I was working there until the end of 2021 and I got hurt and I'm using her insurance to ... while I'm hurt. So I've been there since 20 ... November of 2020.

THE COURT:

Mr. Schrumpf, we got to get you to the mic because the clerk ...

MR. SCHRUMPF:

I'm sorry.

THE COURT:

The court reporter ...

MR. KING:

I'm sorry.

MR. SCHRUMPF:

We'll both have to ...

BY MR. SCHRUMPF:

Q. All right. I show you exhibit 3, what I've labeled exhibit 3. That's the front of the Certificate of Title. Is ... is this for a vehicle that you had purchased?

A. Yes.

Q. And this says it's a 2011 Chevrolet Traverse and it's got the V-I-N number and all. Shows that you, uh, received this in April of 2021?

A. Yes. That's when I, uh, I paid it off, uh, April 5th 2021.

Q. You said that's when you paid it off?

A. I paid it off. The day I paid it off was April 5th 2021.

Q. When did you first acquire the vehicle?

A. I acquired the vehicle, uh, October of 2018.

Q. And what did you use to purchase it? How'd you fund it?

A. Uh, I, uh, I was working as a welding inspector and I used my funds from my job to pay for that.

Q. Did you borrow money against the car?

A. Yes. Yes, I borrowed money.

Q. Who'd you borrow the money from?

A. Southwest Louisiana Credit Union.

Q. And in April of 2021, you paid it off?

A. Yes sir.

Q. We'll get to that document later. All right, I offer Exhibit 3.

THE COURT:

Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. And then it will be entered as defense 3. I mean, Plaintiff 3.

BY MR. SCHRUMPF:

Q. And you're currently under medical care for a back injury?

A. Yes sir.

Q. When did that back injury occur?

A. Uh, May of 2021, I want to say. May or June. I'm not sure the exact day.

Q. All right. And you learned about Charmaine Colston having your car title after you paid it off?

A. Yes sir. The, uh ...

Q. Do you recall how you found out about that?

A. Yes sir. I, uh, I initially ... I went to the court

because she had it and I ... then I couldn't find it and then I filed a police report and when I got the police report back on, uh, October 3rd is when I was able to download the police report, October 3rd of 2022, that's when I discovered who exactly had it.

Q. Did you ever intend to give the car or sell the car to Charmaine Colston?

A. No, not at the time.

Q. Did you intend to, uh, transfer it to her?

A. No sir.

Q. Did you appear on September 7, 2021 before Ms. Amos and sign the ... the transfer of that document?

A. No sir.

Q. Now on Exhibit 1, this says that Charmaine Colston and you both ... and she's testified that both of you appeared. Were you there on September 7, 2021?

A. No sir. I was in New Jersey. I ... at the time, I would ... it would have ... I would have actually been at work.

Q. Did you ever actually see the title?

A. I've never seen the title. This is the only copy I've ever seen.

Q. And this came from the Sheriff's Department?

A. Yes.

Q. After you filed a complaint?

A. Yes.

Q. Do you have evidence that you were in New Jersey on September 7, 2021?

A. Yes. I have multiple pictures, multiple videos. I have, uh, I have my work reports.

Q. All right. Hold a minute. We'll start with exhibit 4.

MR. SCHRUMPF:

One for the judge and one for each of you.

BY MR. SCHRUMPF:

Q. Okay. Can you tell us what exhibit 4 is?

A. Exhibit 4 is my Cross Fit check in. Everyday when we go to class, we get checked in.

Q. All right. You go to class?

A. It's Cross Fit.

Q. And ...

MS. DOMINIC:

And Your Honor, I'd like to ...

Q. ... at the top left of this ...

THE COURT:

Hold on a second. I believe we have an objection.

MR. SCHRMPF:

Okay.

THE COURT:

Go ahead counselor.

MS. DOMINIC:

Yes. I would like to object to it. Lack of foundation, lack of authentication. It really doesn't tell ... it just has Cross Fit on it. It doesn't say where he's at or anything Your Honor.

MR. SCHRUMPF:

So ...

MR. KING:

Okay.

MR. SCHRUMPF:

We'll get to that.

MR. KING:

Yes sir.

MR. SCHRUMPF:

Your Honor, if I may, uh, ask him some more questions about it, I think we'll clear that up.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. At the top left is a date, September 7, 2021. It says HEIC Image. Is this something you get on your phone?

A. This is actually from the, uh, this is from the

Gmail

The Kings <fit4thekings@gmail.com>

Urgent Request to make Judge Richard aware that protected crime victim is testifying.

3 messages

The Kings <fit4thekings@gmail.com> Thu, Nov 14, 2024 at 12:59 PM
To: Ron@lccitycourt.org
Cc: kay.bang@lccitycourt.org
Bcc: truekingfile@gmail.com

Good Ms Bace, and Judge Richard,
memo 11.14.2024

I'm required in writing to inform Judge Richard that I am a protected crime victim by the Texas state Attorney general and I am requesting that all crime victims rights for protection and privacy be afforded to me in light of recent events. I fear a misstep will expose myself and my family to danger. The notices from the Attorney General are attached as well as a police report detailing my somewhat gruesome crime with certain details of assault by these men being redacted for my safety. I'm asking that Judge Richard be informed of these exceptions prior to public record testimony .

I am willing to discuss and explain in Chambers with my lawyer and advocate so that I am not requested to testify to anything that may threaten my life and the lives of my family..

Please handle the attached with utmost discretion as my life and safety depends on it and the case against the gentlemen is ongoing.

Thank You and thank you in advance for your professional courtesy in this matter.
Shunte Jones King
(enclosure three attachments with exhibits.

Thank You so much

3 attachments

Crime Victim Letter Judge R Richard 11.14.2024 (1).pdf
344K

Shooting of King Case still open .pdf
105K

Judge Richard Assault Victims Report
3711K

The Kings <fit4thekings@gmail.com> Tue, Nov 19, 2024 at 11:52 AM
To: truekingfile@gmail.com

[Quoted text hidden]

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3711K

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

***Amended to include evidence of grounds for Judicial Intervention due to what appears to be efforts of judicial bias that may be known to Judge Richard. There have been repeated efforts to intimidate existing counsels, and dissuade new counsel from enrolling into the case by means of ex parte communications. Efforts to deny rights to legal counsel, documented multiple attorneys have attempted to enroll and have been dissuaded by the clerk's office with misleading rhetoric. Special privileges such as the attendance of Orelia Lawdins - Trent legal counsel for Charmaine Y. Colston whom I am a registered domestic violence victim and continue to suffer harassment and stalking examples of this are seen in the Court Records for case #23-2124 as Charmaine Y Colstons attorney said she could not be served as she was not party to the case however the documents she requested by conformed copy mailed to her are in fact grounds for adequate service as Charmaine Colston herself requested the documents. Her then attorney was allowed to attend closed proceedings for the trial on May 21, 2024 prior to a non related family court trial on May 25, 2024 and her presence was inaccurately not recorded into the record as required by law as all non interested parties were asked to be removed from the courtroom and she was not enrolled as council nor was she a witness and this violation was permitted .

Clerk's office denies ever speaking to any attorneys but their efforts to enroll have happened repeatedly since July and they were told Judge Richard is unhappy (refer to evidence and exhibit attached) please refer to documented emails and subpoenas that show at least 5 separate attorneys were either intimidated, told misinformation, told information with intent to dissuade enrollment. There is also the disregard of the untimely filed motions of Kamie Dominic on Oct 31, 2024 where she was required by law to serve concurrently upon both Judge Richard and the plaintiff John King Sr her motions and arguments and she did not. Counsel was allowed to make defamatory lies of infidelity in Kings marriage claiming involvement of a paramour where no such paramour exists. Refer to Louisiana legal definition of paramour, (current sexual / romantic nature person of interest or mistress) how can this be when King was cohabitating with spouse and married at the time the negligence and fraud by Amos occurred ? Additionally all ex girlfriends cannot be considered paramours and Colston is not the immediate preceding romantic partner prior to Kings spouse. If there was a paramour by legal definition it would apply to any persons of romantic nature prior to current spouse, and post any involvement with

on/ off again relationship with ex girlfriend Charmaine Y Colston. In addition Ms Dominic leaves room for misinterpretation as she makes a salacious claim of paramour without any relevance to the case. She screams that Amos' reputation deserves consideration yet it is unethical and she has no evidence of any paramour as King had not seen Colston in person for 13 months prior to transfer of his vehicle illegally. Im asking that this line of Kamie Dominic petition be stricken from the record as it creates risk for King in future legal proceedings that either his current wife, or ex girlfriend can use Dominics petition as proof of an existing Paramour during the marriage and depending on state in which possible divorce proceedings could be filed this could have detrimental financial damaging effects to King.

Lastly and most importantly after reviewing this case with hospital attorney, and the policy of SW Airlines, United Airlines, TSA, Port Authority and the laws of HIPAA and the additional medical procedural protections allowed by the state of New Jersey to seek legal injunction and or restraining order if evidence of violation of civil rights exists or any order by an out of state judge poses immediate threat to patients life or standard of care. Judge Richards inability to consider zoom appearance on an immobile plaintiff who cannot meet clearance standards to fly prior to November 13, 2024 as right now a no fly order is in place for John King due to spinal cord swelling resulting in temporary paralysis and seizure. The request by Judge Richard to appear only in person less than 24 hours after admission for follow up care as documented in the patient chart is not only unreasonable but unconstitutional and deadly. No reasons have been provided as to why Kamie Dominic had 6 months to file her motions timely and she did not file within the 15 day window and did not file concurrently as required by law. As a result this intruded on my right to legal counsel. She also served me on November 1 a legal holiday and I have 7 days from that date to have a motion for continuance received by the clerk's office and Tracking number says the wet signature motions were received timely as Nov 1 was a legal holiday in the state of Louisiana.

Additionally, on November 6, 2024 repeated efforts to reach Lake Charles City Court were prevented as the fax and phone lines were down per Dominic, Bash and my wife Shunte King made repeated attempts to contact and was denied on dates of deadline. Additionally this happened on Oct 31, 2024 and I had to send evidence to Monica Abshire via email to be time stamped in time with exhibits and this was not permitted as Monica Abshire claims she could not see attachments to the notarized petition.

At this time and the lack of a status conference or any audio or court transcripts from prior proceedings how can Plaintiff defend the untimely motions presented by Kamie Dominic as all of the evidence points to some sort of bias in the proceedings as “Renee doesn't have a pot to piss in” has taken priority of the life and civil rights of plaintiff John King and requires the intervention of Judge Richard to stop the influences coming from the clerks office as more than one attorney has sent email complaints of clerks office unwillingness to send case file information, unwillingness to act in a timely fashion, and an eager willingness to share Judge Richard position and emotion towards case # 23-2124 which would be grounds for mistrial with the addition of Orelia Lawdins - Trents presence in the court room being left out of the minutes for a

closed hearing as well as Charmaine Colston by order of conformed copy received appropriate service from the clerk's office.

Dear Honorable Judge Richard,
After repeated denials of due process, and several attempts to deny a fair and balanced trial, and repeated ex parte communications, lack of service, and overall what appears to be an effort to provide Renee Amos with a documented unfair judicial advantage it is now necessary to file evidence and petition ito the record for case number #23-2124 and to serve in proceedings for medical intervention protections for grounds for appeal and for out of state judicial proceedings including but not limited medical injunctions to prevent ordered removal from the States of New York and New Jersey for which NJ/NY Port Authority, TSA, and state transportation guidelines for disabled transport are in place that prevent the transport of John C King Sr plaintiff for means of medical emergency.

Additionally as per the evidence attached opposing counsel is being granted liberties that are in violation of due process and Judge Richards own legal precedent that does not permit untimely served motions and evidence to be permitted unto the record. Please refer to

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant’s recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Tracking # 9505514194044309 63

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the "interest of justice" standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant's Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received

notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant’s claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant’s motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the ____ day of _____, 2024, at _____ o'clock AM, Lake Charles, Louisiana.

_____
signature

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

STATE OF LOUISIANA
PARISH OF CALCASIEU

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical

4. Exhibits to accompany motion to intervene to protect civil rights.

John C King Sr
!!/5/2024

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS . NO. 23-2124	:	PARISH OF CALCASIEU
RENEE AMOS NOTARY PUBLIC NOTARY ID #29374	:	STATE OF LOUISIANA
FILED: _____	:	_____ DEPUTY CLERK OF COURT

JUDGMENT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, and his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing this matter and for reasons orally assigned, entered the following judgment:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT READ and SIGNED this _____ day of _____, 2024, in Lake Charles, Calcasieu Parish, Louisiana.

_____
RON RICHARD, JUDGE DIVISION B
JUDGE, LAKE CHARLES CITY COURT

**John CJ King Sr.
Plaintiff, Pro Se**
**VS Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana**

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions**
Dear Honorable Judge Richard,**

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions
Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  **Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601**
  kamiedominiclaw@gmail.com

- "The Hartford": Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of

further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

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In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

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I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

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- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

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Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested
In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Thank you for your time and consideration.

Respectfully submitted,
John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Exhibits attached audio mailed separately.

Respectfully submitted by
John CJ King Sr.
123 N. Louisiana Avenue
Lake Charles LA 70601
truekingfile@gmail.com
318-995-1705

ORDER

Considering the foregoing motion IT IS ORDERED that this matter come on for trial on the ____ day of _____ or the year 2024 or 2025 at _____ o'clock AM Lake Charles, Louisiana this day of _____

STATE OF LOUISIANA
PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared John CJ King Sr., who, after being duly sworn, did depose and say:

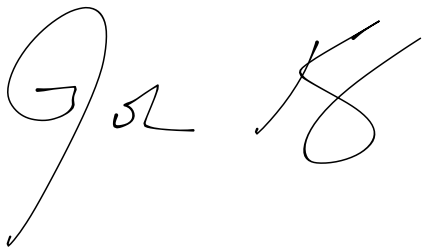
1. **Affiant's Personal Knowledge: I, John CJ King Sr., am the plaintiff in case number VS NO. 23-2124, currently pending before the Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.**
2. **Grounds for Motion: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.**
3. **Request for Continuance: Due to this medical condition, I am unable to attend the hearing scheduled for November 14, 2024, and respectfully request a continuance to allow sufficient time for my medical recovery and to secure adequate legal representation.**
4. **Truthfulness of Submissions: I affirm that all statements and evidence presented in this motion are submitted in good faith, without any intent to delay, defraud, or deceive the Court or any party. The attached documents are accurate and true representations of my medical status and travel**

records, provided to substantiate my request.

5. **Opposition to Frivolous Claims and Sanctions: I further affirm that my responses to the defendant's Motion to Strike and Motion for Sanctions are made in good faith, as I have provided evidence to support all claims filed in this matter. I deny any claims of fraudulent inducement, and I respectfully request that the Court deny the defendant's motions accordingly.**

Further, Affiant saith not.

Signature: _____



John CJ King Sr.

Date: ___10/31/2024_____

Sworn to and subscribed before me this _____ day of _____, 2023.

Notary Public

My Commission Expires: _____

This affidavit should be signed and notarized to accompany your motion.

4o

Shunte Jones-King
P.O. Box 12198
c/o L. Shunte Jones
CVC # [Texas Attorney General]
Austin, Texas 78711-2198
11/14/2024

The Honorable Judge R. Richard
Case # NO. 23-2124

Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana**]
Lake Charles, LA 70601

Re: Request for Sealed Records and Testimony for Protected Crime Victim, Shunte Jones-King, in Accordance with Texas and Louisiana Crime Victims' Rights and Confidentiality Laws

Dear Judge Richard,

I am writing as **Ms. Shunte Jones-King**, a protected crime victim under the State of Texas Attorney General's Office, with ongoing investigations in both Texas and Louisiana related to the violent assault I suffered. It is not with pride that I admit I was the victim of a violent assault by three different men who assaulted, shot me, and left me on the side of the road to die. This was after a Ku Klux Klan march and rally in the areas nearby and I was assaulted by multiple men violently which now has me listed as a protected crime victim with the Texas State Attorney General (case provided attached can provide more information if interviewed in private and all my records and statements be protected in your courts and not to be accessed by public record. Due to the continued threats and the extreme nature of the crime, I respectfully request the Court seal all records, testimony, and identifying information pertaining to my case. This request is made to ensure my safety, as well as the safety of those close to me, as provided for under Texas and Louisiana Crime Victims' Rights and related confidentiality laws.

Confidentiality and Victims' Rights Under Texas and Louisiana Law

Under **Texas Code of Criminal Procedure, Article 56** and **Louisiana Crime Victims Reparations Act (La. R.S. 46:1801 et seq.)**, I am entitled to the following rights and protections as a crime victim:

1. **Confidentiality of Personal Information**
    - **Texas Code of Criminal Procedure, Article 56.82** provides for confidentiality through the **Address Confidentiality Program (ACP)**, which protects the residential address of victims of family violence, sexual assault, human trafficking, and stalking.

    - **Louisiana Code of Criminal Procedure, Article 322** and **Article 325** provide confidentiality measures for victims in similar circumstances, with special protections to ensure the victim's safety by keeping personal identifiers private.
2. **Protection from Further Harm and Threats**
    - Texas **Article 56.02** grants victims the right to be reasonably protected from the accused throughout the criminal justice process. Louisiana similarly acknowledges this right under **La. R.S. 46:1844**, which mandates that all state law enforcement and judicial systems take every possible precaution to avoid public exposure of a victim's personal information.
3. **Sealing of Sensitive Evidence and Documents**
    - **Texas Code of Criminal Procedure, Article 56.45** and **Louisiana Code of Evidence, Article 412** both provide for the sealing of sensitive records in cases involving violent crime and sexual assault. This includes testimony, medical records, and documentation that contain sensitive information about physical injuries or mental trauma suffered by the victim.
4. **Privacy in Court Proceedings and Communications**
    - Texas law further protects victims by allowing them to **consult with the prosecutor** regarding the type of evidence shared with the defense, and by securing privacy of photos, medical records, and other documents that could compromise the victim's safety.
    - Louisiana law offers equivalent protections under **La. R.S. 46:1842** and **La. C.Cr.P. Art. 325**, ensuring that victims of violent crimes are treated with fairness and respect throughout judicial processes and are protected from any unnecessary exposure that could lead to further harm.
5. **Participation in the Address Confidentiality Program (ACP)**
    - I am an active participant in the ACP, as administered by the Texas Attorney General's Crime Victims Services Division. Under this program, I am permitted to utilize an official substitute address (P.O. Box 12198, c/o L. Shunte Jones, Austin, TX 78711-2198) to keep my actual residential address confidential.

Request for Specific Protections in Court Proceedings

To safeguard my rights under Texas and Louisiana law, I respectfully request that the Court:

1. **Seal all identifying information** about me, including personal details, addresses, and any location-specific information in records or testimony.
2. **Protect sensitive records**, such as medical reports, photos, and personal testimonies, under seal or permit them only for in-camera review by the Court and involved parties to prevent public disclosure.
3. **Restrict public access** to case-related documents and information to ensure the safety of myself and others in my immediate environment.
4. **Apply privacy measures to all communications** about my case in line with Texas Code of Criminal Procedure and Louisiana Crime Victims' Rights laws to prevent unnecessary exposure of my identity.

Additional Confidentiality Protections for Victims of Violent Crimes

Given the sensitive nature of this case and the continued threat to my safety, I request that the following rights be respected under Texas Code of Criminal Procedure and Louisiana Crime Victims' laws:

- **Non-disclosure of injury details**: Any confidential victim report sections discussing specific injuries or bodily harm inflicted during the crime should be redacted to protect my safety.
- **Access limitations**: The Court should limit public access to my statements, allowing only authorized personnel to view sensitive details related to this case.
- **Notification of proceedings and defendant's status**: Both Texas and Louisiana law grant victims the right to be informed of all court proceedings, as well as parole or release status of the defendant. I request that such information be provided to me confidentially.

Conclusion

Thank you for your attention to these requests. I trust the Court will ensure that my rights under Texas and Louisiana confidentiality laws are upheld, so I may proceed through this process with the protections guaranteed to victims of violent crimes. Your assistance in applying these safeguards is greatly appreciated.

Respectfully,

Mrs. Shunte Jones-King

Enclosure: Confidential Victim Report (with sections redacted for privacy and safety reasons)

November 14, 2024

Schrumpf Law Office

A Professional Law Corporation
3801 Maplewood Drive
Sulphur, Louisiana 70663

Oliver "Jackson" Schrumpf*
Stacy D. Saltzman†

(337) 625-9077
Fax: (337) 625-8231

* Licensed in LA and TEXAS
† Licensed in LA and MISSISSIPPI

November 22, 2024

VIA EMAIL: ron@lccitycourt.org and mabshire@lccitycourt.onmicrosoft.com

Honorable Judge Ron Richard
Lake Charles City Court
118 W. Mill Street
Lake Charles, LA 70601

Re: John Clifford J King
Vs. 2023-2124
Renee Amos, Notary Public
Notary ID #29374
Lake Charles City Court

Dear Judge Richard,

Please be advised that I do not represent Shunte King in the contempt of court proceeding. Attempted service on me for the contempt proceeding is not effective.

Respectfully,

Oliver Schrumpf

Oliver "Jackson" Schrumpf

OJS/jm

Re: Motion to Continue has been denied. Trial is November 14, 2024

1 message

True King <truekingfile@gmail.com> Fri, Nov 8, 2024 at 7:24 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>
Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>, Dawn Brown <dbrown@schrumpf-law.com>, Taye King <kingshunte@gmail.com>

GM
Thank you for enrolling Mr Schrumpf Ms Jinnifer was right when she said you are an actual litigator who knows and practices the law and Im grateful.
My wifes name is Shunte King, she is attached to this email as Kingshunte@gmail.com the household accounts we use are in her name.

My wife will be coming on Wednesday in person to defend me. If I have to be rolled in with medical assistance Im doing everything in my power to come but Im going to be clear Im going to be in excruciating pain and unable to walk unassisted or stand unassisted but I will have to add this to my damages as without us there in person the evidence will not hold. That s what theyre tring to achieve and attempting to scare my wife away from testifying but she will stand by me so that this abuse ends. Weve been living in hell for 4,5 years nonstop and the covering up and bullying has to stop.

After prayer and discussion my wife and brother will be showing up as witnesses as well as my brother but please dont tell Judge Richard she is coming because she was submitted as a witness during discovery. After reviewing this email and proving our innocence I can also show you confidential emails between attorneys that highlight that ex parte communication is happening and that unfortunately Judge Richards claims are identical to what is evidenced in writing. I only ask that you do not share the names of the attorneys supplying the information as one of them went too far in writing and told everything and we dont even know what to do with evidence that is this bold. I would prefer to attach it without your assistants and allow you to decide whether to share it.
I am innocent. My wife is innocent. We have the emails to prove it. But are not sure we want to provide proof against people who are acting unethically for fear of retaliation.

Every word of the petitions are true and the bullying has occurred in writing Judge Richard just doesnt know we have the evidence.

Click the attachment for all of the information to the actual "imposter" who is practicing law Im pretty sure it will be amusing to see the truth.
See attached

On Thu, Nov 7, 2024 at 6:12 PM True King <truekingfile@gmail.com> wrote:
>
> Mr Schrumpf,
>
> As you can tell from the evidence no one is practicing law. When a plaintiff doesn’t have money their own motions must be filed.
>
> When those motions aren’t filed they punish you.
>

> This case was reset multiple times due to opposing counsel.
>
> Additionally Shunte King is NOT a resident of Louisiana and cannot practice law.
>
> These claims would need to be supported by evidence . Someone in the clerks office is friends with Renee Amos.
> As you can tell by the motions an effort was made to screw John king over with tricks . None of this has anything to do with the case except when someone is ill their caretaker must respond.
>
> Per the medical report John King Sr is suffering from cognitive dysfunction and they were attempting to force him to board a plane on a torn spinal cord or have default sanctions. Therefore motions had to be filed.
>
> They can make allegations but freelance.com receipts of paralegal preparation say otherwise as well as numerous other attorneys who have in writing said the clerk and the judge's paralegal have threatened multiple times.
>
> Mr Schrumpf we were told you were experienced and cannot be told about the law because you know the law. The evidence in this case shows efforts to "free" Ms Amos from liability than indemnifying John King.
>
> Additionally it is prejudicial for them to assume if one spouse is educated they wouldn't proof read documents for the other who struggles.
>
> What's the real underlying issue because that's what we're trying to show you.
>
> Please advise opportunity to get on a call.
>
> Thank You
>
>
>
>
> On Thu, Nov 7, 2024 at 5:58 PM Oliver Schrumpf <oschrumpf@schrumpf-law.com> wrote:
>>
>> I just got back from about a two hour hearing. Judge Ron Richard had counsel for both parties come to court about 1:30 today. He signed my motion to enroll as counsel, but before taking up the motion to continue, he insisted on reading through multiple e-mails, motions, and requests, and complaints which he believes were written by Mrs. King (Shaunte King) and e-mailed from truekingfile@gmail.com
>>
>>
>>
>> Judge Richard said he will consider allowing Mr. King to testify via ZOOM ONLY IF THE COURT RECEIVES A LETTER SIGNED BY A PHYSICIAN BY MONDAY NOVEMBER 11 (A COURT HOLIDAY) SO WE SHOULD TRY TO GET IT TOMORROW IF POSSIBLE) THE LETTER FROM THE PHYSICIAN NEEDS TO SAY THAT HE IS TREATING MR. JOHN C. KING, WHAT MR.KING'S CONDITION IS, AND THAT MR. KING IS PROHIBITED FROM TRAVELLING BECAUSE OF SEVERE RISK OF PERMANENT INJURY (OR WHATEVER OTHER REASON THE DOCTOR HAS FOR PROHIBITING TRAVEL FROM NEW JERSEY TO LOUISIANA). IT MUST BE SIGNED BY THE DOCTOR AND DATED. OTHERWISE, IF MR. KING DOES NOT APPEAR IN COURT NOVEMBER 14, 2024, THE TRIAL (WHICH HAS BEEN SET FOUR TIMES) WILL GO FORWARD.
>>
>>
>>
>>
>>
>> Also, the judge believes that Shaunte King has violated La. R.S. 37:212 (Practicing Law without a license):
>>
>> La. R.S. §212. "Practice of law" defined
>>
>> A. The practice of law means and includes:
>>
>> (1) In a representative capacity, the appearance as an advocate, or the drawing of papers, pleadings or documents, or the performance of any act in connection with pending or prospective proceedings before any court of record in this state; or
>>
>> (2) For a consideration, reward, or pecuniary benefit, present or anticipated, direct or indirect;
>>
>> (a) The advising or counseling of another as to secular law;
>>

>> (b) In behalf of another, the drawing or procuring, or the assisting in the drawing or procuring of a paper, document, or instrument affecting or relating to secular rights;
>>
>> (c) The doing of any act, in behalf of another, tending to obtain or secure for the other the prevention or the redress of a wrong or the enforcement or establishment of a right; or
>>
>> (d) Certifying or giving opinions, or rendering a title opinion as a basis of any title insurance report or title insurance policy as provided in R.S. 22:512(17), as it relates to title to immovable property or any interest therein or as to the rank or priority or validity of a lien, privilege or mortgage as well as the preparation of acts of sale, mortgages, credit sales or any acts or other documents passing titles to or encumbering immovable property.
>>
>> B. Nothing in this Section prohibits any person from attending to and caring for his own business, claims, or demands; or from preparing abstracts of title; or from insuring titles to property, movable or immovable, or an interest therein, or a privilege and encumbrance thereon, but every title insurance contract relating to immovable property must be based upon the certification or opinion of a licensed Louisiana attorney authorized to engage in the practice of law. Nothing in this Section prohibits any person from performing, as a notary public, any act necessary or incidental to the exercise of the powers and functions of the office of notary public, as those powers are delineated in Louisiana Revised Statutes of 1950, Title 35, Section 1, et seq.
>>
>> C. Nothing in this Section shall prohibit any partnership, corporation, or other legal entity from asserting or defending any claim, not exceeding five thousand dollars, on its own behalf in the courts of limited jurisdiction or on its own behalf through a duly authorized partner, shareholder, officer, employee, or duly authorized agent or representative. No partnership, corporation, or other entity may assert any claim on behalf of another entity or any claim assigned to it.
>>
>> D. Nothing in Article V, Section 24, of the Constitution of Louisiana or this Section shall prohibit justices or judges from performing all acts necessary or incumbent to the authorized exercise of duties as judge advocates or legal officers.
>>
>> Amended by Acts 1976, No. 515, §1; Acts 1980, No. 161, §1; Acts 1981, No. 535, §1; Acts 1985, No. 783, §1; Acts 1989, No. 22, §1, eff. June 14, 1989; Acts 1992, No. 673, §1; Acts 2010, No. 24, §1; Acts 2011, No. 325, §2, eff. Jan. 1, 2012.
>>
>>
>>
>> As a result of this, Judge Richard ordered that Shaunte King appear in his Court November 14, 2024 at 9:00 AM. I advised the Court that I represent John C. King, not Mrs. King, but he said Shaunte King has been filing papers in this court and acting as an attorney and she must appear in person or he will hold her in contempt and may refer the case to the District Attorney for prosecution.
>>
>>
>>
>>
>>
>> ALSO, Judge Richard read into the record numerous documents from truekingfile@gmail.com asserting unethical and criminal conduct by Judge Richard and/or his staff members. He intends to have you defend a contempt of Court charge.
>>
>>
>>
>> Again, I advised the Court that I was retained only to represent John C. King on the claim for the Notary bond and I do not represent Shaunte King.
>>
>>
>>
>> 1. Please attempt to get the treating physician to execute a letter SIGNED BY A PHYSICIAN BY MONDAY NOVEMBER 11 (A court holiday- so we should try to get it tomorrow if possible) THE LETTER FROM THE PHYSICIAN NEEDS TO SAY THAT HE IS TREATING MR. JOHN C. KING, WHAT MR.KING'S CONDITION IS, AND THAT MR. KING IS PROHIBITED FROM TRAVELLING from New Jersey to Louisiana until (Date) BECAUSE OF SEVERE RISK OF PERMANENT INJURY (OR WHATEVER OTHER REASON THE DOCTOR HAS FOR PROHIBITING TRAVEL FROM NEW JERSEY TO LOUISIANA). IT MUST BE SIGNED BY THE DOCTOR AND DATED. IT MUST BE RECEIVED BY ME SO I CAN GET IT TO THE JUDGE FIRST THING TUESDAY MORNING.
>>
>> 2. Please advise if Shaunte King will plan to be here Thursday November 14 for trial.
>>
>> 3. Please advise what accommodations you have to testify via ZOOM if we can get the doctor's letter in time.
>>

>>
>>
>> Oliver “Jackson” Schrumpf
>>
>> Schrumpf Law Office (PLC)
>>
>> 3801 Maplewood Drive
>>
>> Sulphur, LA 70663
>>
>> Phone: 337-625-9077
>>
>> Fax: 337-625-8231
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>> oschrumpf@schrumpf-law.com
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Chat GPTDocumentation and Paralegal.pdf
4121K

Case # 23-2124
King Vs Amos Hartford

Exhibits to accompany judicial filings
Please refer to case law in motions

EXHIBITS 1: DENIAL OF RIGHT TO FAIR COUNSEL IN JUDICIAL PROCEEDINGS KAMIE DOMINIC MOTIONS ALLOWED TO CIRCUMVENT DUE PROCESS TO DISCOURAGE ENROLLMENT BY QUALIFIED COUNSEL IN TIME AS HER MOTIONS WERE NOT FILED AND SERVED SAME DAY MOTION TO QUASH AND STRIKE WAS FILED BUT NO STATUS CONFERENCE ABOUT THE CONCERNS

Correspondence from 4 of 7 Attorneys, 6 in total have had contact with the Clerk's office but when Shunte King POA / spouse John King Sr Spoke with Ms Monica Abshire on Monday Nov 4, 2024 after the legal holiday on Friday Nov 1 Ms Abshire told Shunte King that the clerk's office had had zero contact with any attorneys about the nature of the case of Judge Richards mood concerning the case but attached are 4 different Louisiana attorneys correspondence all stating the same sentiment and one attorney whose correspondence has not been provided for fear of retribution by Judge Richard it is emphasized that Judge Redd STRONGLY wants Renee Amos not to suffer damages of any sort as ‘she does not have a pot to piss in”; and there have been off record ex parte communications coming from the someone in the clerk's office who another attorney in writing has warned to get an attorney because the case appears to be heavily biased and there is resistance to cooperation within the clerk's office. In an urgent conversation with Ms Bash Judge Richards paralegal she asked Shunte King “are you implying that the clerk's office is dissuading counsel from enrolling on your case and that ex parte communication is taking place” ? When Shunte King responded “No I'm simply relying what the attorneys are saying . Ms Bash then said “I don't believe that at all King has had plenty of time to enroll counsel” then Shunte King told bash there was evidence of multiple attorneys complaining that the clerk's office was creating hurdles to enrollment by saying it would be a long time to send the case file then offering personal expressions on behalf of Judge Redds mood and sentiment. This would be a violation of King civil rights, and any order placing King in medical danger once Richard is made aware there would be grounds for medical injunction by the state of new jersey to prevent orders to move an unreleased patient out of state documented with heightened risk for stroke, permanent paralysis or death from seizure as documented in the hospital inpatient records King currently suffers from seizures as a result of a fall and is experiencing rehabilitation treatments daily until November 13 2024 to coerce spinal cord back into spinal cavity. The extent of the disease's damage was reassessed Nov 5 and MRI results have not come back. The plaintiff is proceeding assuming that Judge Richard will intervene to stop this once the Judge is aware.

23-2124 John C. J. King Sr. vs. Renee Amos

Monica Abshire <mabshire@lccitycourt.onmicrosoft.com> Tue, Aug 13, 10:48 AM
to me

Good Morning Mr. King –

This is to inform you Judge Richard has granted your Pauper Affidavit.
You will be allowed from this date, August 13, 2024 to file in Pauper status, waiving any deposits required, but not relieving you of costs.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

True King <truekingfile@gmail.com> Wed, Oct 23, 12:22 PM
to shantell, Monica, bcc: me, bcc: Tyria

Monica
Thank you for the update.

Attached is Shantell from our attorneys office.
We're in need of some things that are not clear and hope that you could help Shantell.

Shantell,
This is Ms Abshire the Lake Charles City Court Clerk. She may be able to answer your questions.

Whitney Triplet <whitney@rouzanlaw.com> Thu, Aug 1, 4:06 PM
to me

Good afternoon,

I've finally made it back into the office, and I looked again through what you've sent. The car case is missing documentation of orders that you told me exist. Specifically, the motion to reconsider that she filed should have a signed judgment issued by the judge, and I don't know what else may be out there that she has secretly filed.

In order to proceed at a by the hour billing, this firm requires a $10,000 retainer that my boss requires to be paid prior to any work that is not on a contingency.

Again, I really would like to take this on for you; but there is too much information and background things that have happened that are unknown to me. Once you are able to gather and confirm all pleadings and judgments that have been filed and stamped by the clerk, then we can revisit this. In the meantime, if you decide to handle this pro se, (and this is my personal opinion, not legal advice) your next step may want to be to deliver to the opposing counsel some interrogatories where you are asking specific questions about the incident. You should send them to Ms. Amos through her attorney. You could copy the format of the questions she sent you. Be very specific with your questions. Also make sure to send some to the insurance so they see you are serious about pursuing this.

At this time, that is the most that I can do to assist you. There are just too many gaps in the information available to me.

Whitney Simone Triplet
Attorney at Law
Don A. Rouzan & Associates, L.L.C.
Mailing Address:
P.O. Box 871687
New Orleans, LA 70187-1687
Physical Address:

-

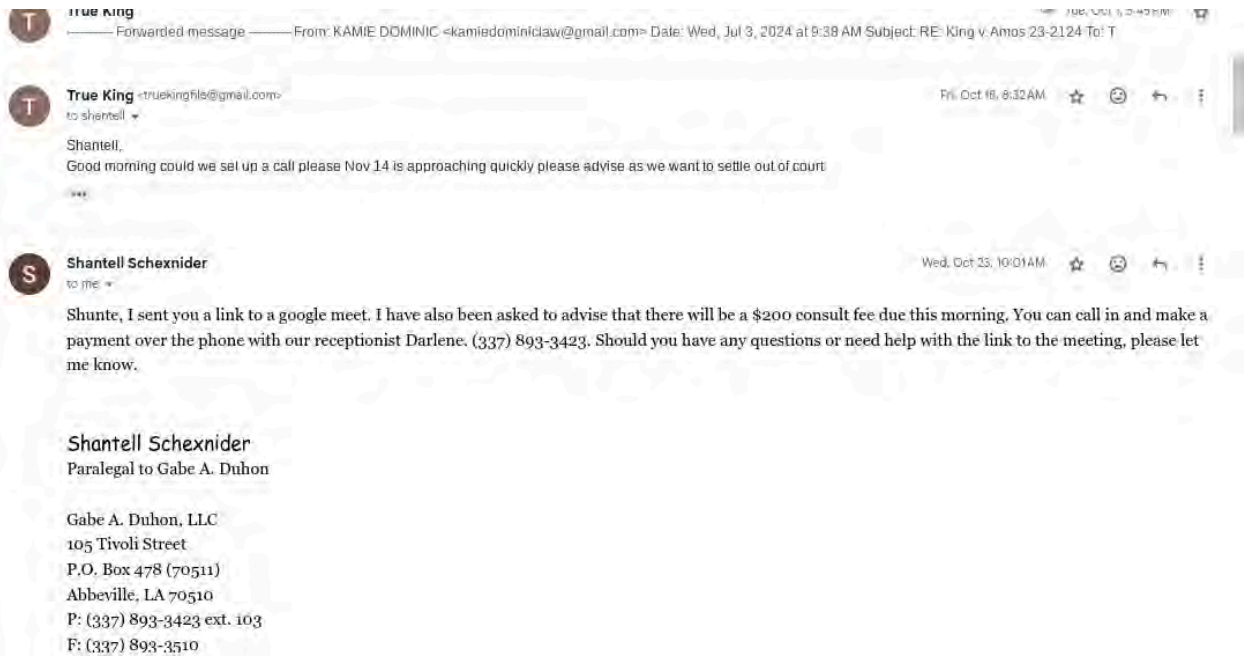
**

True King Oct 23, 2024, 10:28 AM
Hello Shantel,Where is the link I just saw this email.

Shantell Schexnider Oct 23, 2024, 10:30 AM
https://meet.google.com/kau-eoqx-hyb From: True King <truekingfile@gmail.com> Sent: Wednesday, October 23, 2024 2:28 PM To: Shantell Schexnider <shantell@vermil

True King <truekingfile@gmail.com> Oct 23, 2024, 10:33 AM
to Shantell

**



True King
---------- Forwarded message ---------- From: KAMIE DOMINIC <kamiedominiclaw@gmail.com> Date: Wed, Jul 3, 2024 at 9:38 AM Subject: RE: King v. Amos 23-2124 To: T

True King <truekingfile@gmail.com> Fri, Oct 18, 8:32 AM
to shantell

Shantell,
Good morning could we set up a call please Nov 14 is approaching quickly please advise as we want to settle out of court

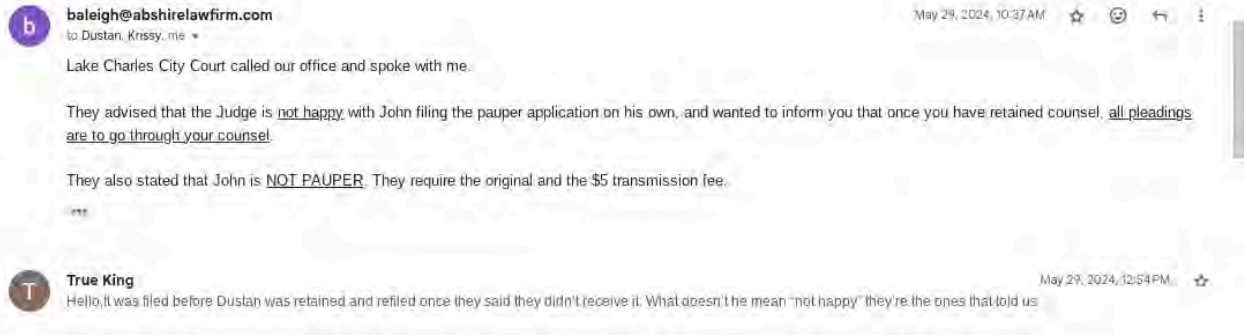
Shantell Schexnider Wed, Oct 23, 10:01 AM
to me

Shunte, I sent you a link to a google meet. I have also been asked to advise that there will be a $200 consult fee due this morning. You can call in and make a payment over the phone with our receptionist Darlene. (337) 893-3423. Should you have any questions or need help with the link to the meeting, please let me know.

Shantell Schexnider
Paralegal to Gabe A. Duhon

Gabe A. Duhon, LLC
105 Tivoli Street
P.O. Box 478 (70511)
Abbeville, LA 70510
P: (337) 893-3423 ext. 103
F: (337) 893-3510

**



baleigh@abshirelawfirm.com May 29, 2024, 10:37 AM
to Dustan, Krissy, me

Lake Charles City Court called our office and spoke with me.

They advised that the Judge is not happy with John filing the pauper application on his own, and wanted to inform you that once you have retained counsel, all pleadings are to go through your counsel.

They also stated that John is NOT PAUPER. They require the original and the $5 transmission fee.

True King May 29, 2024, 12:54 PM
Hello,It was filed before Dustan was retained and refiled once they said they didn't receive it. What doesn't he mean "not happy" they're the ones that told us

***



Joseph Burke Nov 1, 2024, 11:22 AM (5 days ago)
to me, Chelsea, Hannah

Mrs. King,

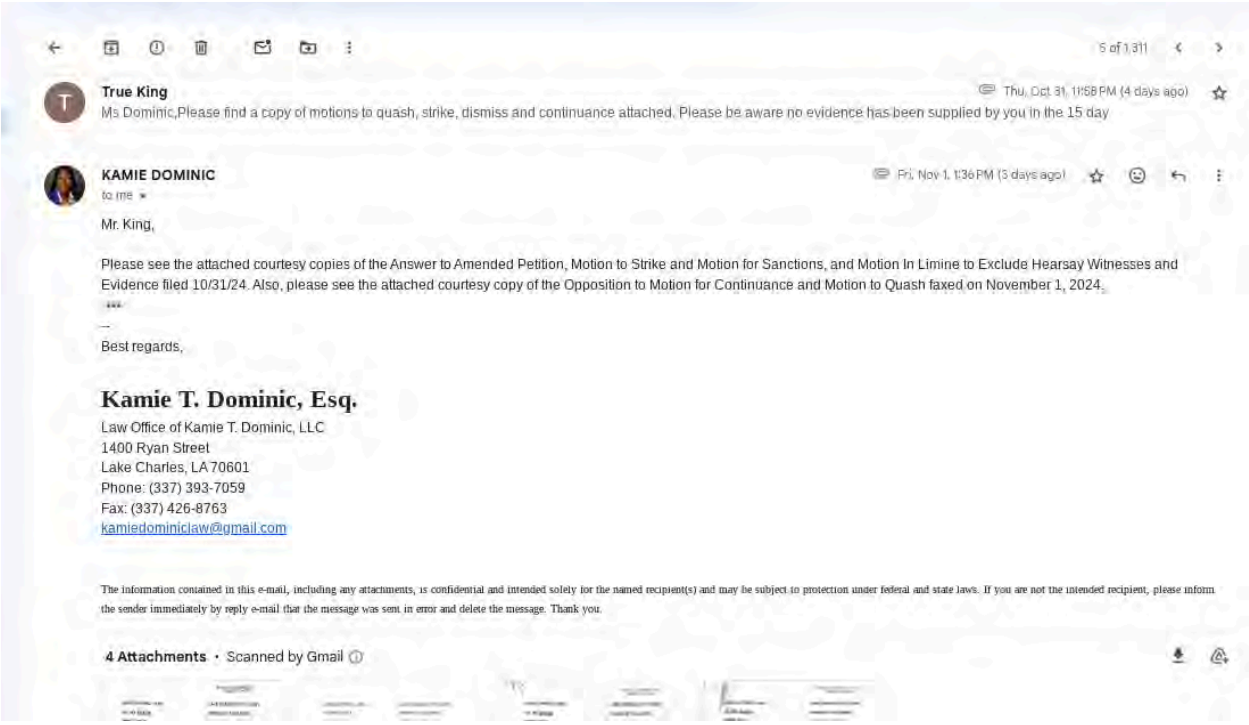
I was simply relaying the docket information provided to me from the court's clerk. I do now know what the subject of the motion or sanctions is.

Thanks,

Joe
Sent from my iPhone

> On Oct 31, 2024, at 1:14 PM, True King <truekingfile@gmail.com> wrote:

***



5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.
Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail

*** Medical Exhibits sent to Judge Richard and Kamie Dominic on Monday Nov 4, 2024 with request to be sealed.***

EXHIBITS SECTION #2 HARASSMENT OF COLSTON AND HER ATTORNEY ATTEMPTS AT UNETHICAL INVOLVEMENT IN COURT PROCEEDINGS AND UNDOCUMENTED ATTENDANCE AT CLOSED COURT HEARING FOR CASE #23-2124

Mail weekly sent to my mothers house. She goes to the post office and mails things to keep my mother and grandmother sick.
Charmaine does not recognize this behavior as insane or inappropriate seeing as though my wife has never met my children and has never even had a conversation with charmaine. This is years later after stealing the car and she does this and brags that there won't be justice for me or a punishment for her.

This is sick. This isn't a paramour, this is a mentally disturbed individual and Ms Dominic should remain ethical when dealing with victims. I hadn't seen Charmaine colston in person in 13 months at the time of car theft so how is that a paramour? I was married and living with my wife. It's more lies this is the harassment contributing to my seizures and paralysis and to discriminate against my gender is unethical and slander.



lies

Tyria's comment on your post

Tyria Guillory
I don't agree with him on make it work that is not good for a women or man that only wants control and not have a relationship for the kids. My nephew stayed with his kids mother regardless to the mental and physical abuse that he was hiding from his family. She cut him, burned him, she it him in the head with an object that left him with seizures. you have to do what is best for you, especially i... See more

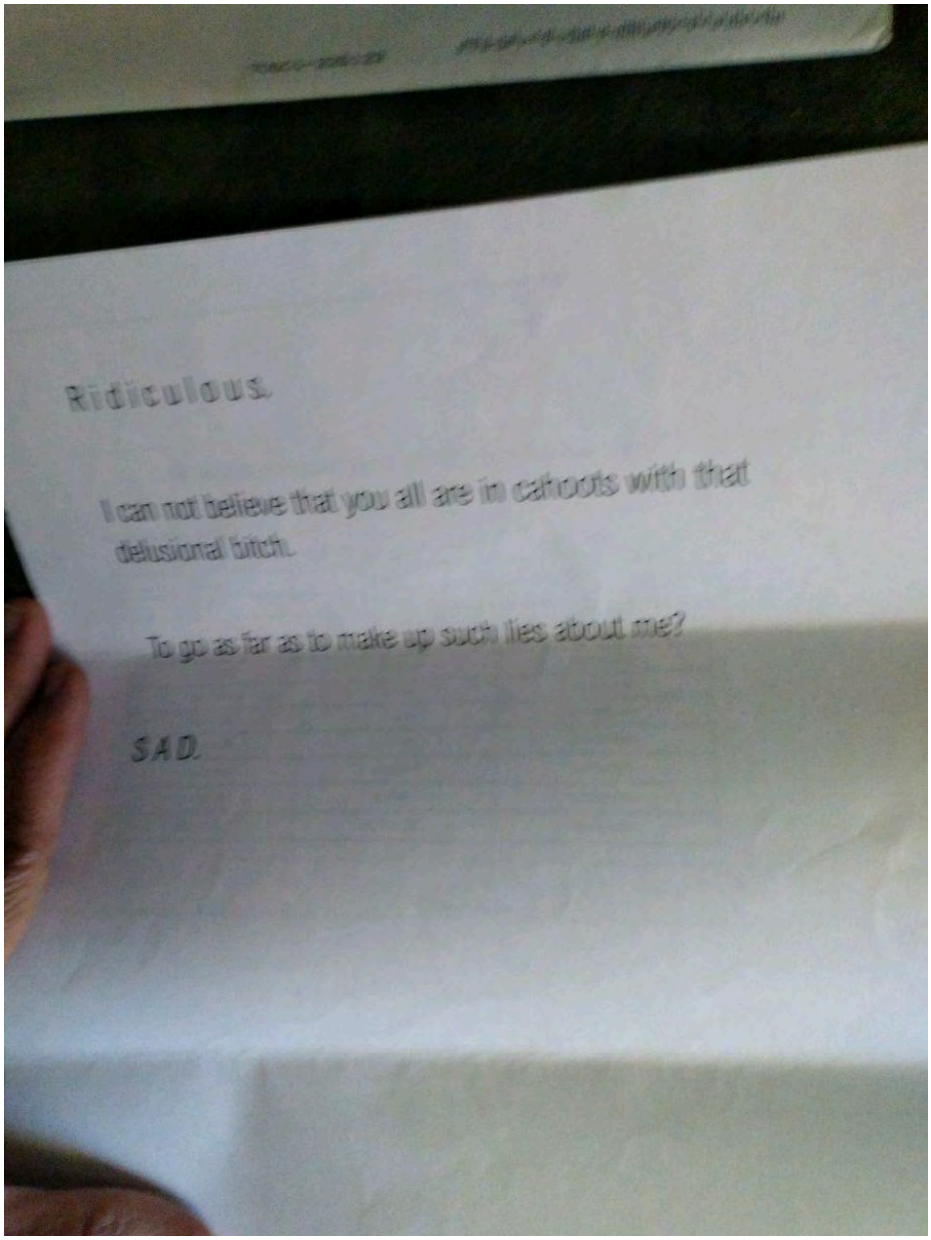
7h Like Reply 1

King Tay
Tyria Guillory I would settle for just keeping my photos, name, my likeness , my husbands god baby photos, shoot just don't post anyone that isn't posting you.

Or you will be subpoenaed to court if you deal with them and lose money off work...
-OR you will be accused of harassment. She gonna initiate every text, email, and mail stuff to your house "good morning ALL", as if you got a wedding ring t... See more

33m Like Reply


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123

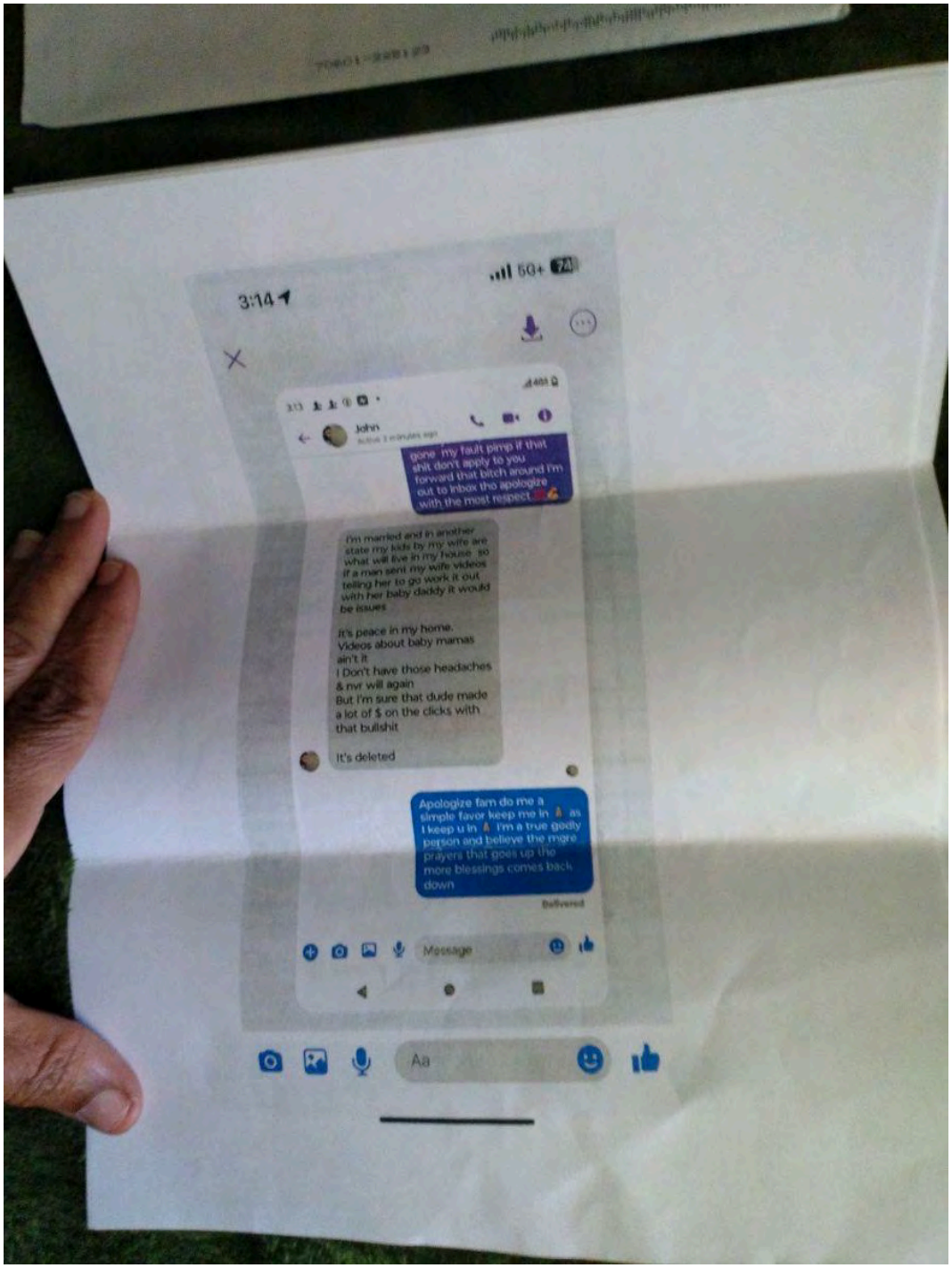


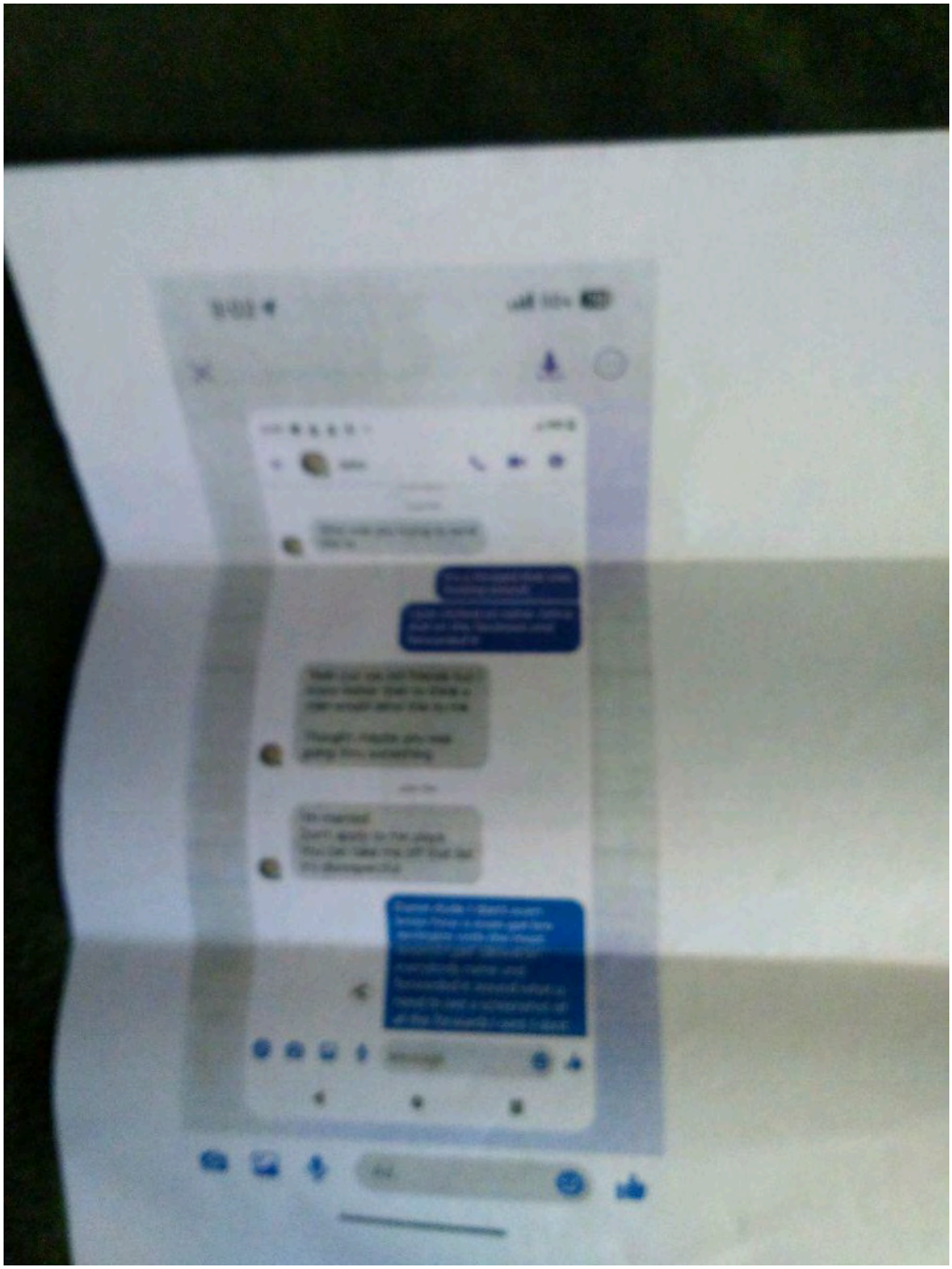
Ridiculous.

I can not believe that you all are in cahoots with that delusional bitch.

To go as far as to make up such lies about me?

SAD.

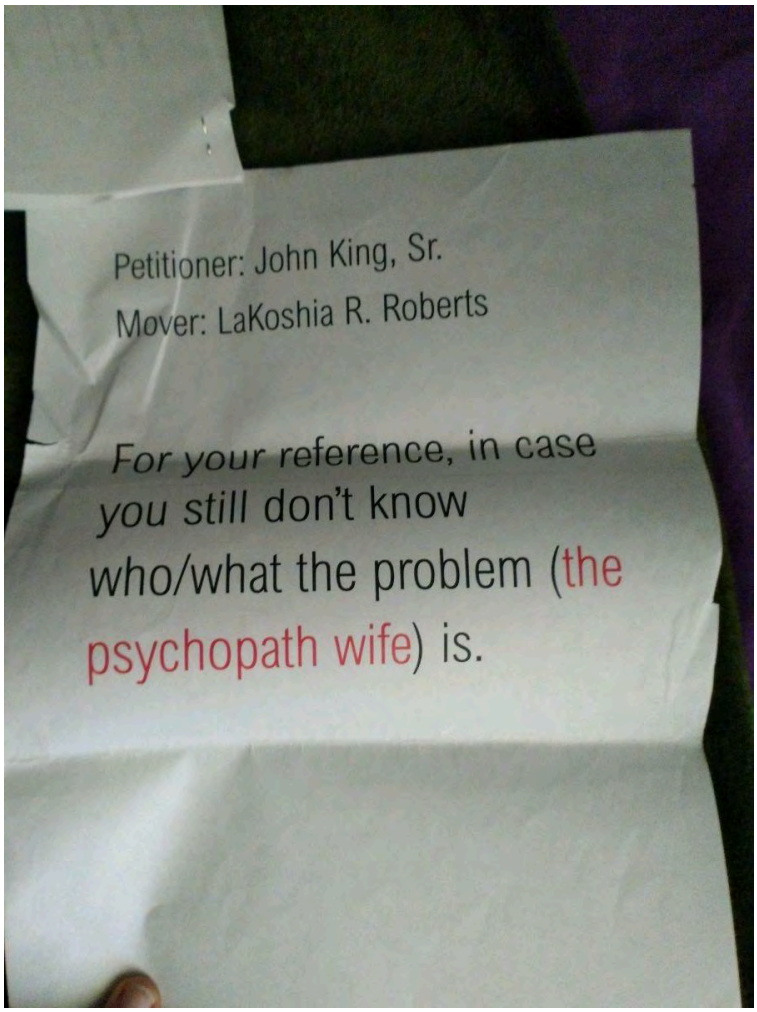

3:14
5G+
John
gone my fault pimp if that shit don't apply to you forward that bitch around I'm out to inbox tho apologize with the most respect
I'm married and in another state my kids by my wife are what will live in my house so if a man sent my wife videos telling her to go work it out with her baby daddy it would be issues
It's peace in my home. Videos about baby mamas ain't it
I Don't have those headaches & nvr will again
But I'm sure that dude made a lot of $ on the clicks with that bullshit
It's deleted
Apologize fam do me a simple favor keep me in 🙏 as I keep u in 🙏 I'm a true godly person and believe the more prayers that goes up the more blessings comes back down
Delivered
Message
Aa




King
921 Moss St.
Lake Charles, La 70601
BATON ROUGE LA 707
19 JUL 2024 PM 1 L
FREEDOM
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123


King
821 Moss St.
Lake Charles, LA 70601
BATON ROUGE LA 707
7 AUG 2024 PM 3 L
FREEDOM
Monica King Guillory
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123




Petitioner: John King, Sr.
Mover: LaKoshia R. Roberts
For your reference, in case you still don't know who/what the problem (the psychopath wife) is.


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave
Lake Charles, La 70601
70601-225123

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

***Amended to include evidence of grounds for Judicial Intervention due to what appears to be efforts of judicial bias that may be known to Judge Richard. There have been repeated efforts to intimidate existing counsels, and dissuade new counsel from enrolling into the case by means of ex parte communications. Efforts to deny rights to legal counsel, documented multiple attorneys have attempted to enroll and have been dissuaded by the clerk's office with misleading rhetoric. Special privileges such as the attendance of Orelia Lawdins - Trent legal counsel for Charmaine Y. Colston whom I am a registered domestic violence victim and continue to suffer harassment and stalking examples of this are seen in the Court Records for case #23-2124 as Charmaine Y Colstons attorney said she could not be served as she was not party to the case however the documents she requested by conformed copy mailed to her are in fact grounds for adequate service as Charmaine Colston herself requested the documents. Her then attorney was allowed to attend closed proceedings for the trial on May 21, 2024 prior to a non related family court trial on May 25, 2024 and her presence was inaccurately not recorded into the record as required by law as all non interested parties were asked to be removed from the courtroom and she was not enrolled as council nor was she a witness and this violation was permitted .

Clerk's office denies ever speaking to any attorneys but their efforts to enroll have happened repeatedly since July and they were told Judge Richard is unhappy (refer to evidence and exhibit attached) please refer to documented emails and subpoenas that show at least 5 separate attorneys were either intimidated, told misinformation, told information with intent to dissuade enrollment. There is also the disregard of the untimely filed motions of Kamie Dominic on Oct 31, 2024 where she was required by law to serve concurrently upon both Judge Richard and the plaintiff John King Sr her motions and arguments and she did not. Counsel was allowed to make defamatory lies of infidelity in Kings marriage claiming involvement of a paramour where no such paramour exists. Refer to Louisiana legal definition of paramour, (current sexual / romantic nature person of interest or mistress) how can this be when King was cohabitating with spouse and married at the time the negligence and fraud by Amos occurred ? Additionally all ex girlfriends cannot be considered paramours and Colston is not the immediate preceding romantic partner prior to Kings spouse. If there was a paramour by legal definition it would apply to any persons of romantic nature prior to current spouse, and post any involvement with

on/ off again relationship with ex girlfriend Charmaine Y Colston. In addition Ms Dominic leaves room for misinterpretation as she makes a salacious claim of paramour without any relevance to the case. She screams that Amos' reputation deserves consideration yet it is unethical and she has no evidence of any paramour as King had not seen Colston in person for 13 months prior to transfer of his vehicle illegally. Im asking that this line of Kamie Dominic petition be stricken from the record as it creates risk for King in future legal proceedings that either his current wife, or ex girlfriend can use Dominics petition as proof of an existing Paramour during the marriage and depending on state in which possible divorce proceedings could be filed this could have detrimental financial damaging effects to King.

Lastly and most importantly after reviewing this case with hospital attorney, and the policy of SW Airlines, United Airlines, TSA, Port Authority and the laws of HIPAA and the additional medical procedural protections allowed by the state of New Jersey to seek legal injunction and or restraining order if evidence of violation of civil rights exists or any order by an out of state judge poses immediate threat to patients life or standard of care. Judge Richards inability to consider zoom appearance on an immobile plaintiff who cannot meet clearance standards to fly prior to November 13, 2024 as right now a no fly order is in place for John King due to spinal cord swelling resulting in temporary paralysis and seizure. The request by Judge Richard to appear only in person less than 24 hours after admission for follow up care as documented in the patient chart is not only unreasonable but unconstitutional and deadly. No reasons have been provided as to why Kamie Dominic had 6 months to file her motions timely and she did not file within the 15 day window and did not file concurrently as required by law. As a result this intruded on my right to legal counsel. She also served me on November 1 a legal holiday and I have 7 days from that date to have a motion for continuance received by the clerk's office and Tracking number says the wet signature motions were received timely as Nov 1 was a legal holiday in the state of Louisiana.

Additionally, on November 6, 2024 repeated efforts to reach Lake Charles City Court were prevented as the fax and phone lines were down per Dominic, Bash and my wife Shunte King made repeated attempts to contact and was denied on dates of deadline. Additionally this happened on Oct 31, 2024 and I had to send evidence to Monica Abshire via email to be time stamped in time with exhibits and this was not permitted as Monica Abshire claims she could not see attachments to the notarized petition.

At this time and the lack of a status conference or any audio or court transcripts from prior proceedings how can Plaintiff defend the untimely motions presented by Kamie Dominic as all of the evidence points to some sort of bias in the proceedings as “Renee doesn't have a pot to piss in” has taken priority of the life and civil rights of plaintiff John King and requires the intervention of Judge Richard to stop the influences coming from the clerks office as more than one attorney has sent email complaints of clerks office unwillingness to send case file information, unwillingness to act in a timely fashion, and an eager willingness to share Judge Richard position and emotion towards case # 23-2124 which would be grounds for mistrial with the addition of Orelia Lawdins - Trents presence in the court room being left out of the minutes for a

closed hearing as well as Charmaine Colston by order of conformed copy received appropriate service from the clerk's office.

Dear Honorable Judge Richard,
After repeated denials of due process, and several attempts to deny a fair and balanced trial, and repeated ex parte communications, lack of service, and overall what appears to be an effort to provide Renee Amos with a documented unfair judicial advantage it is now necessary to file evidence and petition ito the record for case number #23-2124 and to serve in proceedings for medical intervention protections for grounds for appeal and for out of state judicial proceedings including but not limited medical injunctions to prevent ordered removal from the States of New York and New Jersey for which NJ/NY Port Authority, TSA, and state transportation guidelines for disabled transport are in place that prevent the transport of John C King Sr plaintiff for means of medical emergency.

Additionally as per the evidence attached opposing counsel is being granted liberties that are in violation of due process and Judge Richards own legal precedent that does not permit untimely served motions and evidence to be permitted unto the record. Please refer to

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant’s recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Tracking # 950551419404430963 00

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the "interest of justice" standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant's Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received

notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant’s claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant’s motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the ____ day of _____, 2024, at _____ o'clock AM, Lake Charles, Louisiana.

_____
signature

Case # 23-2124 King Vs Amos The Hartford 11/6/2024
Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

STATE OF LOUISIANA
PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared **John CJ King Sr.**, who, after being duly sworn, did depose and say:

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical

_____

Emergency Complaint Against Judge Ron Richard, Lake Charles City Court

12 messages

True King <truekingfile@gmail.com> Mon, Feb 17, 2025 at 12:23 PM
To: True King <truekingfile@gmail.com>
Bcc: osc@lasc.org, stephen.street@la.gov, joe.lotwick@la.gov, alisa.jones@la.gov

John C. J. King

123 N. Louisiana Avenue

Lake Charles, LA, 70615

Truekingfile@gmail.com

318-995-6021

01-05-25

Judicial Commission of Louisiana

RETURN THIS FORM TO:

The Judiciary Commission of Louisiana

Office of Special Counsel

601 St. Charles Avenue

New Orleans, Louisiana 70130

osc@lasc.org

Subject: Judicial Complaint Against Judge Ron Richard

Lake Charles City Court Judge

118 W Mill St, Lake Charles, LA 70601

To Whom It May Concern,

I am submitting this formal complaint against the Honorable Judge Ron Richard of the City Court of Lake Charles, Louisiana, regarding conduct in Case No. 23-2124 (King v. Amos, The Hartford). This complaint

arises from repeated incidents of judicial misconduct, bias, procedural irregularities, and actions that have resulted in severe harm to me and my family.

1. Basis for Complaint

Judge Richard has demonstrated persistent bias and unfair treatment throughout the proceedings, including:

• Judicial Bias & Prejudice: Making inappropriate comments, engaging in retaliatory behavior, and allowing ex parte communications that compromised my legal representation.

• Violation of Due Process: Denying me adequate notice for hearings, allowing opposing counsel to submit untimely motions, and proceeding without ensuring my legal representation.

• Endangerment of a Protected Witness: Ignoring my medical condition, requiring in-person appearances despite physical immobility, and disregarding my warnings about threats to my spouse's safety, which ultimately resulted in a fatal incident.

• Procedural Misconduct: Improper courtroom procedures, misrepresentation by court clerks regarding counsel enrollment, and the use of fabricated addresses to harass my family.

2. Specific Incidents of Concern

1. Retaliatory Conduct: Judge Richard issued contempt charges against my spouse days after she sought medical treatment during a hearing, despite my seizure in court being ignored.

2. Ex Parte Communications & Intimidation: Legal counsel was dissuaded from representing me due to private discussions with the judge, violating ethical standards.

3. Unlawful Detention & Threats: My spouse was unlawfully detained in a sealed courtroom, denied restroom access, and threatened with incarceration despite not being on trial.

4. Failure to Act on Safety Warnings: I repeatedly warned the court that its negligence would lead to harm, which tragically resulted in a homicide directly tied to this case.

3. Request for Investigation & Action

Given these serious violations, I respectfully request the Judicial Commission to:

• Conduct a formal investigation into Judge Ron Richard's conduct in Case No. 23-2124.

• Review his actions for violations of judicial ethics, including bias, due process violations, and endangerment of a witness.

• Take appropriate disciplinary action to prevent further harm to litigants appearing before his court.

I have attached supporting documentation, including my motion to recuse Judge Richard, which outlines additional details. Please confirm receipt of this complaint and advise on any further steps necessary.

Sincerely,

John C. King Sr

123 N. Louisiana Avenue
Lake Charles La 70601
truekingfile@gmail.com

one Judicial complaint -King against Ron Richard.pdf
28K

Office of Special Counsel <osc@lasc.org> Wed, Feb 19, 2025 at 12:48 PM
To: True King <truekingfile@gmail.com>

Mr. King,

In your email below, you stated that:

”I have attached supporting documentation, including my motion to recuse Judge Richard, which outlines additional details.”

We did not receive any supporting documentations. Please forward any supporting information, you would like to include with your complaint.

Thanks,

The Judiciary Commission of Louisiana

Office of Special Counsel

601 St. Charles Avenue

New Orleans, LA 70130

Phone: (504) 568-8299

From: True King <truekingfile@gmail.com>
Sent: Monday, February 17, 2025 11:24 AM
To: True King <truekingfile@gmail.com>
Subject: Emergency Complaint Against Judge Ron Richard, Lake Charles City Court

EXTERNAL EMAIL: Please use caution as this email originated from an external source.

[Quoted text hidden]

True King <truekingfile@gmail.com> Wed, Feb 19, 2025 at 1:13 PM
To: Office of Special Counsel <osc@lasc.org>

Good morning it is being mailed in as the online instructions said no attachments.

Is this incorrect
[Quoted text hidden]

Office of Special Counsel <osc@lasc.org> Wed, Feb 19, 2025 at 1:43 PM
To: True King <truekingfile@gmail.com>

We do take attachments, but not over 20 pages. I will put a note on your file re documentation being mailed.

[Quoted text hidden]

Office of Special Counsel <osc@lasc.org> Wed, Feb 26, 2025 at 9:48 AM
To: True King <truekingfile@gmail.com>

Good morning Mr. King,

Just following up to check to see if you have mailed the additional documentations. We have not received it as of 2/25/2025.

Thanks,

The Judiciary Commission of Louisiana

Office of Special Counsel

601 St. Charles Avenue

New Orleans, LA 70130

Phone: (504) 568-8299

[Quoted text hidden]

True King <truekingfile@gmail.com> Wed, Feb 26, 2025 at 12:38 PM
To: Office of Special Counsel <osc@lasc.org>

Good afternoon yes it was mailed had to wait for all parties to be served and have confirmation of service for the lawsuit. My lawyer just finished providing remainder of the documentation and will arrive it's been taking about 7 days and they were served on this last Thursday.

Thank you for circling back
[Quoted text hidden]

Joe Lotwick <Joe.Lotwick@la.gov> Wed, Feb 26, 2025 at 3:11 PM
To: True King <truekingfile@gmail.com>

Mr. King,

The Office of State Inspector General has received your email in which you state a complaint against Lake Charles City Court Judge Ron Richard. OIG has no jurisdiction or authority to investigate judges as our jurisdiction is limited to the executive branch of state government. It appears that you may have also sent your complaint to the Judiciary Commission of Louisiana, Office of Special Counsel. I believe that is the proper office in which to lodge such a complaint.

Joe Lotwick

OIG General Counsel

From: True King <truekingfile@gmail.com>
Sent: Monday, February 17, 2025 11:24 AM
To: True King <truekingfile@gmail.com>
Subject: Emergency Complaint Against Judge Ron Richard, Lake Charles City Court

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

[Quoted text hidden]

True King <truekingfile@gmail.com> Thu, Feb 27, 2025 at 2:45 PM
To: Joe Lotwick <Joe.Lotwick@la.gov>

Mr lotwick
The evidence will show it involves several pieces and people that fall in your jurisdiction.

I contacted federal divisions and provided descriptions and was provided website with info as to instances where the inspector general office would be appropriate for this investigation.

Wouldn't it be appropriate to review the evidence to make sure this doesn't involve members from those branches as this involves more than one official

Also what do you mean it appears I also issued a complaint with special counsel?
[Quoted text hidden]

True King <truekingfile@gmail.com> Sun, Mar 16, 2025 at 6:10 PM
To: Tyria Guillory <msteetax@gmail.com>, John King <johncjking86@gmail.com>, kguillorymonica@gmail.com

This shows John never once read this cause he would simply change the judges names and change the complaints and be done.
---------- Forwarded message ---------
From: **True King** <truekingfile@gmail.com>
Date: Mon, Feb 17, 2025 at 12:23 PM
Subject: Emergency Complaint Against Judge Ron Richard, Lake Charles City Court
To: True King <truekingfile@gmail.com>
[Quoted text hidden]

---

one Judicial complaint -King against Ron Richard.pdf
28K

True King <truekingfile@gmail.com> Mon, May 19, 2025 at 10:04 AM

To: Office of Special Counsel <osc@lasc.org>

Hello I never received any correspondence in regards to my judicial review request may i please have an update?

[Quoted text hidden]

Office of Special Counsel <osc@lasc.org> Mon, May 19, 2025 at 10:58 AM
To: True King <truekingfile@gmail.com>

[Quoted text hidden]

John C.J. King 25-062.pdf
58K

True King <truekingfile@gmail.com> Mon, May 19, 2025 at 2:55 PM
To: Office of Special Counsel <osc@lasc.org>

Will have my lawyer rewrite it for both myself and a separate one for my wife .

He’s denying my wife access to an attorney how is this not judicial misconduct?

We will have two separate detailed investigations submitted with evidence of unethical behavior thank you
[Quoted text hidden]

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

Against Judge Ronald Richard

Lake Charles City Court

Calcasieu Parish Louisiana

Submitted by

John C J King Sr

Telephone 3189951705

Email truekingfile@gmail.com

Date April 2 2026

Mailing Address for Complaint

Judiciary Commission of Louisiana

Office of Special Counsel

601 St Charles Avenue

New Orleans Louisiana 70130 3481

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

Against Judge Ronald Richard

Lake Charles City Court

Calcasieu Parish Louisiana

Submitted by

John C J King Sr

Telephone 3189951705

Email truekingfile@gmail.com

Date April 2 2026

Mailing Address for Complaint

Judiciary Commission of Louisiana

Office of Special Counsel

601 St Charles Avenue

New Orleans Louisiana 70130 3481

I INTRODUCTION

This complaint is submitted as a separate and independent complaint regarding the conduct of Judge Ronald Richard of the Lake Charles City Court. My purpose is not simply to express disagreement with rulings. My concern is a broader pattern of intimidation, unequal treatment, procedural irregularities, disregard of medical vulnerability, and conduct that created the appearance that ordinary rules were not being applied fairly in matters involving me and my family.

I have also previously complained about Judge Richard. The Judiciary Commission acknowledged receipt of an earlier complaint and assigned File No. 25 062. I am submitting this complaint as a separate and expanded statement because additional facts, surrounding circumstances, and related events are relevant to understanding the full pattern of conduct and why I believe formal review is warranted.

II PRIOR SMALL CLAIMS CASE INVOLVING THEFT OF MY VEHICLE

Before the later notary case, I filed a small claims matter against the person who stole my vehicle. That earlier matter was also assigned to Judge Richard. In that case, I filed a motion that clearly stated my argument, and I attached exhibits that I believed supported it. The proof I relied on included materials that came from law enforcement. My concern is not limited to the fact that the case was dismissed with prejudice. My concern is that there appears to be no accessible minutes or transcript that would allow any later reviewer to evaluate what was argued, what evidence was actually considered, what objections were made, or how the ruling was justified.

I also recall that the person I sued was allowed to have a colleague appear for him in court. During that hearing, the atmosphere felt belittling. I perceived that the judge and that individual reminisced and interacted in a way that made me feel diminished as a litigant. At the same time, I was not afforded the same sense that my evidence would receive a fair and orderly review under normal procedure. My concern is not simply that the case was dismissed. My concern is that the absence of a record prevents meaningful review of whether proper procedure was followed at all.

III THE LATER NOTARY CASE AND RETURN OF THE MATTER TO JUDGE RICHARD

After the earlier vehicle related case, I was informed that because the later matter involved allegations of fraud by a notary, and because that notary was allegedly connected to other fraudulent events, justice might still be available through a different procedural path. I then pursued the later matter involving the notary, which became Case No. 23 2124. The uploaded court materials reflect that judgment in that case was rendered in open court on November 14 2024 and read and signed on November 21 2024, after which a devolutive appeal was granted on December 3 2024. The appellate writ materials also reflect that on December 30 2024 the trial court rescinded pauper status and ordered counsel to appear on matters outside the original attorney client agreement.

What troubled me in the later proceedings was that after a different judge had been assigned, the matter was reassigned back to Judge Richard. That reassignment heightened my concern that the same judge who had already made earlier decisions would again control later proceedings involving overlapping facts and credibility issues. In court, I believed Judge Richard was guiding the defense even though the

defendant was represented by counsel. I also believed that late, sloppy, or untimely filings were allowed for the defense even though I was given no comparable grace. Earlier filings in the uploaded record also state that motions by defense counsel were not served concurrently as required and that attorneys trying to enroll for me encountered resistance and discouragement from the clerk side of the court.

IV MEDICAL VULNERABILITY AND FAILURE TO ACCOMMODATE

A major part of my concern is the way my physical condition was handled. In filings related to the notary case, I raised that I was medically unable to travel safely and that forcing in person appearance posed serious risk. Those filings state that I was dealing with spinal cord swelling, temporary paralysis, seizure activity, inability to travel safely, and an urgent need for accommodation. A separate letter submitted to Judge Richard on November 14 2024 also requested privacy protections for my wife as a protected crime victim and asked the court to safeguard sensitive testimony and records. Later correspondence in this project also documents additional serious medical limitations.

On one of the court days that is central to this complaint, I had already been waiting while court matters were being heard. I was in extreme pain. I could not take my medicine when I needed it. I was on a walker. I was visibly vulnerable. I was twitching, crying uncontrollably, and in obvious distress. I believe that any reasonable judicial officer should have recognized the need for caution, de escalation, and accommodation rather than escalation and intimidation.

V POST RULING COMMAND TO LOCK THE COURTROOM DOORS

The event that most clearly reflected coercion to me happened after Judge Richard had already ruled on the matter that was before him. On that day, I had counsel present. I had previously appeared pro se in earlier stages, but for that hearing I had an attorney. After the ruling was issued and the case was complete, Judge Richard directly caused the courtroom doors to be locked. As I have stated, he said words to the effect of, "Nobody going anywhere yall lock them doors."

That was not my understanding of normal courtroom procedure after a completed ruling. I was on a walker at the time. Because of my physical condition, I could not move freely or quickly. Under those circumstances, locking the doors after the matter had concluded felt intimidating and threatening. I do not describe that moment as merely uncomfortable. I describe it as an assertion of control over me at a time when the case before the court was already over, when I was physically vulnerable, and when I was not in a position to safely or confidently navigate a coercive confrontation.

VI ATTEMPT TO FORCE MY ATTORNEY TO REPRESENT ME ON A MATTER NOT BEFORE THE COURT

While the courtroom was secured and movement restricted, Judge Richard tried to make my lawyer for the completed case represent me on another issue that had not occurred and was not the matter for which counsel had been retained. The appellate writ materials already in this project state that on December 30 2024 the trial court ordered Oliver Schrumpf to appear and represent John King in contempt proceedings or on matters raised in later in proper person pleadings even though counsel had not prepared those pleadings and had not undertaken to represent me on those issues.

That matters because it shows that my complaint is not just emotional disagreement with a courtroom moment. There is already documentary support in this project showing that the court ordered counsel to appear beyond the scope of the original representation after the case had proceeded to appeal. My concern is that the court was using its authority to expand the proceeding, pressure counsel, and create legal exposure outside the actual matter that had been adjudicated.

VII ACCUSATIONS THAT I WAS PRACTICING LAW AND USE OF UNRELATED CASE KNOWLEDGE

At the same time, Judge Richard accused me of practicing law or acted as though my prior lawful self representation was somehow improper. I had represented myself earlier in the case before retaining counsel. I was attempting to protect my own interests. I had also used technology tools, including AI drafting assistance, to help me prepare filings. I was not holding myself out as licensed counsel for the public. I was not purporting to be an attorney.

The accusation felt especially improper because it occurred while the judge was also making references to other cases in which he was not the assigned judge or was raising matters that were not before him at that time. That gave me the impression that he was drawing on outside knowledge and using it to try to coerce admissions, force explanations, or manufacture fault in me and in my wife after the case already in front of him had concluded.

VIII SCHOOL BOARD CONFLICT CONCERN

Another concern that I believe belongs in this complaint is that during the same general period as my first case in Judge Richard's court, he was also on the board of my children's charter school, Lake Charles Charter Academy. At that time I had obtained a restraining order in New Jersey because I was being stalked, my job was being harassed, and threats of violence from the opposing parent were constant. I have stated that I had an order allowing me to pick my children up from school in order to avoid conflict.

I was informed that even though I had that order, school personnel were told not to release my children to me. As I have stated it, I was told that the school's board member instructed them not to release my children to me despite me having an order which allowed it. I include this not as a stray grievance, but because it raised concern for me that Judge Richard's institutional role outside the courtroom may have intersected with family conflict involving me while he was also presiding over matters affecting me in court. Whether that concern proves a formal conflict is for investigators to decide. But it is part of the full context in which I experienced his conduct.

IX ESCALATION AGAINST MY WIFE

I have also alleged that after complaints were made regarding Judge Richard's behavior, the situation escalated against my wife. I have stated that an effort was first made to accuse her of practicing law, which I disputed and explained by stating that I used AI for help and that I had been the one protecting my own interests. I have further alleged that after that explanation, the focus shifted and a police officer fabricated a report and affidavit that were then used to create an unlawful warrant for my wife's arrest. I understand that such allegations are serious. I include them because they are part of the retaliatory

pattern that I believe followed our efforts to object, appeal, and complain.

An earlier complaint in this project already asserted that Judge Richard issued contempt related action against my spouse after she sought medical treatment during a hearing, that she was unlawfully detained in a sealed courtroom, denied restroom access, and threatened with incarceration despite not being on trial, and that repeated warnings about safety were disregarded. I am preserving those earlier allegations here because they are part of the same overall pattern I want the Commission to review.

X WHY I AM ASKING FOR INVESTIGATION

When I look at these events together, I do not see isolated misunderstandings. I see a pattern. I see an earlier vehicle theft related matter dismissed with prejudice without a meaningful record for review. I see later reassignment of the notary matter back to the same judge. I see unequal treatment in filings and courtroom management. I see disregard for medical vulnerability. I see a completed hearing turning into a locked courtroom confrontation. I see an attempt to force my lawyer into matters outside the representation. I see accusations that I was practicing law when I was trying to protect myself. I see references to unrelated cases. I see concern about outside institutional power through the school board. And I see escalation directed at my wife after complaints were made.

For those reasons, I respectfully request that the Judiciary Commission investigate Judge Richard's conduct in these matters, including the absence of a meaningful record in the earlier case, the handling of Case No. 23 2124, the events that occurred after the ruling when the courtroom doors were locked, the treatment of my attorney and my wife, and any conflict or improper influence that may have existed in connection with outside roles or retaliatory actions.

XI DECLARATION

I declare under penalty of perjury that the facts stated in this complaint are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

John C J King Sr 

Case # 23-2124
King Vs Amos Hartford

Exhibits to accompany judicial filings
Please refer to case law in motions

EXHIBITS 1: DENIAL OF RIGHT TO FAIR COUNSEL IN JUDICIAL PROCEEDINGS KAMIE DOMINIC MOTIONS ALLOWED TO CIRCUMVENT DUE PROCESS TO DISCOURAGE ENROLLMENT BY QUALIFIED COUNSEL IN TIME AS HER MOTIONS WERE NOT FILED AND SERVED SAME DAY MOTION TO QUASH AND STRIKE WAS FILED BUT NO STATUS CONFERENCE ABOUT THE CONCERNS

Correspondence from 4 of 7 Attorneys, 6 in total have had contact with the Clerk's office but when Shunte King POA / spouse John King Sr Spoke with Ms Monica Abshire on Monday Nov 4, 2024 after the legal holiday on Friday Nov 1 Ms Abshire told Shunte King that the clerk's office had had zero contact with any attorneys about the nature of the case of Judge Richards mood concerning the case but attached are 4 different Louisiana attorneys correspondence all stating the same sentiment and one attorney whose correspondence has not been provided for fear of retribution by Judge Richard it is emphasized that Judge Redd STRONGLY wants Renee Amos not to suffer damages of any sort as ‘she does not have a pot to piss in”; and there have been off record ex parte communications coming from the someone in the clerk's office who another attorney in writing has warned to get an attorney because the case appears to be heavily biased and there is resistance to cooperation within the clerk's office. In an urgent conversation with Ms Bash Judge Richards paralegal she asked Shunte King “are you implying that the clerk's office is dissuading counsel from enrolling on your case and that ex parte communication is taking place” ? When Shunte King responded “No I'm simply relying what the attorneys are saying . Ms Bash then said “I don't believe that at all King has had plenty of time to enroll counsel” then Shunte King told bash there was evidence of multiple attorneys complaining that the clerk's office was creating hurdles to enrollment by saying it would be a long time to send the case file then offering personal expressions on behalf of Judge Redds mood and sentiment. This would be a violation of King civil rights, and any order placing King in medical danger once Richard is made aware there would be grounds for medical injunction by the state of new jersey to prevent orders to move an unreleased patient out of state documented with heightened risk for stroke, permanent paralysis or death from seizure as documented in the hospital inpatient records King currently suffers from seizures as a result of a fall and is experiencing rehabilitation treatments daily until November 13 2024 to coerce spinal cord back into spinal cavity. The extent of the disease's damage was reassessed Nov 5 and MRI results have not come back. The plaintiff is proceeding assuming that Judge Richard will intervene to stop this once the Judge is aware.

23-2124 John C. J. King Sr. vs. Renee Amos

Monica Abshire <mabshire@lccitycourt.onmicrosoft.com> Tue, Aug 13, 10:48 AM
to me

Good Morning Mr. King –

This is to inform you Judge Richard has granted your Pauper Affidavit.
You will be allowed from this date, August 13, 2024 to file in Pauper status, waiving any deposits required, but not relieving you of costs.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

True King <truekingfile@gmail.com> Wed, Oct 23, 12:22 PM
to shantell, Monica, bcc: me, bcc: Tyria

Monica
Thank you for the update.

Attached is Shantell from our attorneys office.
We're in need of some things that are not clear and hope that you could help Shantell.

Shantell,
This is Ms Abshire the Lake Charles City Court Clerk. She may be able to answer your questions.

Whitney Triplet <whitney@rouzanlaw.com> Thu, Aug 1, 4:06 PM
to me

Good afternoon,

I've finally made it back into the office, and I looked again through what you've sent. The car case is missing documentation of orders that you told me exist. Specifically, the motion to reconsider that she filed should have a signed judgment issued by the judge, and I don't know what else may be out there that she has secretly filed.

In order to proceed at a by the hour billing, this firm requires a $10,000 retainer that my boss requires to be paid prior to any work that is not on a contingency.

Again, I really would like to take this on for you; but there is too much information and background things that have happened that are unknown to me. Once you are able to gather and confirm all pleadings and judgments that have been filed and stamped by the clerk, then we can revisit this. In the meantime, if you decide to handle this pro se, (and this is my personal opinion, not legal advice) your next step may want to be to deliver to the opposing counsel some interrogatories where you are asking specific questions about the incident. You should send them to Ms. Amos through her attorney. You could copy the format of the questions she sent you. Be very specific with your questions. Also make sure to send some to the insurance so they see you are serious about pursuing this.

At this time, that is the most that I can do to assist you. There are just too many gaps in the information available to me.

Whitney Simone Triplet
Attorney at Law
Don A. Rouzan & Associates, L.L.C.
Mailing Address:
P.O. Box 871687
New Orleans, LA 70187-1687
Physical Address:

-

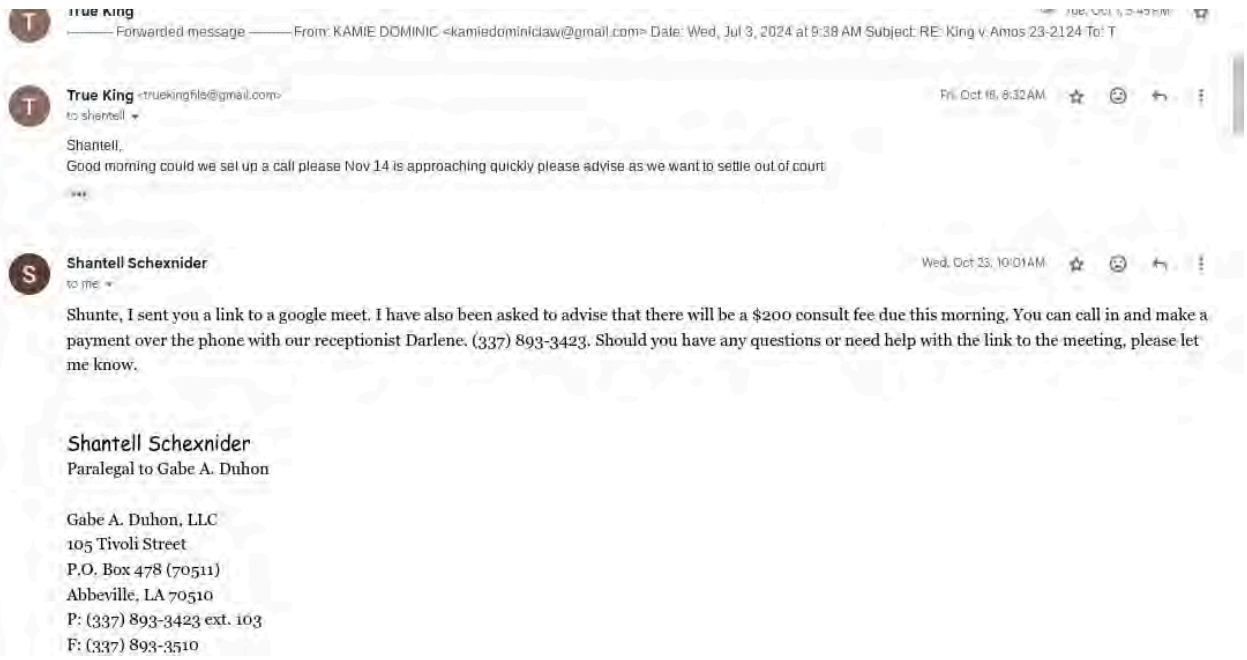
**

True King Oct 23, 2024, 10:28 AM
Hello Shantel,Where is the link I just saw this email.

Shantell Schexnider Oct 23, 2024, 10:30 AM
https://meet.google.com/kau-eoqx-hyb From: True King <truekingfile@gmail.com> Sent: Wednesday, October 23, 2024 2:28 PM To: Shantell Schexnider <shantell@vermil

True King <truekingfile@gmail.com> Oct 23, 2024, 10:33 AM
to Shantell

**



True King
---------- Forwarded message ---------- From: KAMIE DOMINIC <kamiedominiclaw@gmail.com> Date: Wed, Jul 3, 2024 at 9:38 AM Subject: RE: King v. Amos 23-2124 To: T

True King <truekingfile@gmail.com> Fri, Oct 18, 8:32 AM
to shantell

Shantell,
Good morning could we set up a call please Nov 14 is approaching quickly please advise as we want to settle out of court

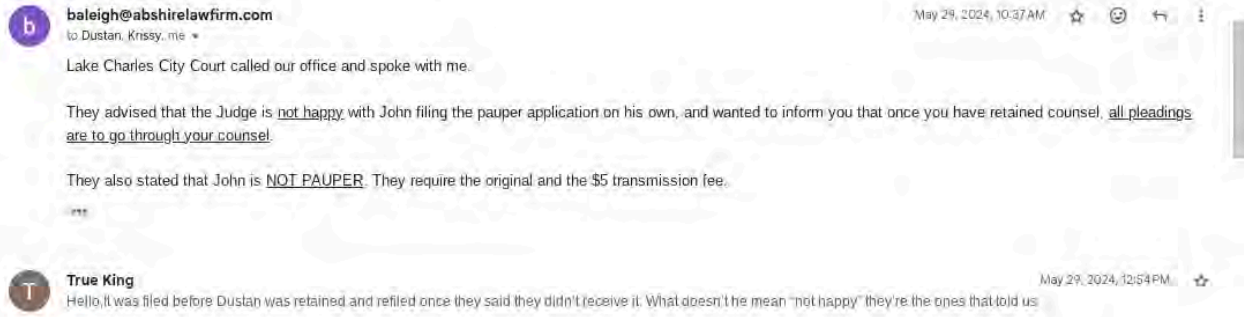
Shantell Schexnider Wed, Oct 23, 10:01 AM
to me

Shunte, I sent you a link to a google meet. I have also been asked to advise that there will be a $200 consult fee due this morning. You can call in and make a payment over the phone with our receptionist Darlene. (337) 893-3423. Should you have any questions or need help with the link to the meeting, please let me know.

Shantell Schexnider
Paralegal to Gabe A. Duhon

Gabe A. Duhon, LLC
105 Tivoli Street
P.O. Box 478 (70511)
Abbeville, LA 70510
P: (337) 893-3423 ext. 103
F: (337) 893-3510

**



baleigh@abshirelawfirm.com May 29, 2024, 10:37 AM
to Dustan, Krissy, me

Lake Charles City Court called our office and spoke with me.

They advised that the Judge is not happy with John filing the pauper application on his own, and wanted to inform you that once you have retained counsel, all pleadings are to go through your counsel.

They also stated that John is NOT PAUPER. They require the original and the $5 transmission fee.

True King May 29, 2024, 12:54 PM
Hello,It was filed before Dustan was retained and refiled once they said they didn't receive it. What doesn't he mean "not happy" they're the ones that told us

***



Joseph Burke Nov 1, 2024, 11:22 AM (5 days ago)
to me, Chelsea, Hannah

Mrs. King,

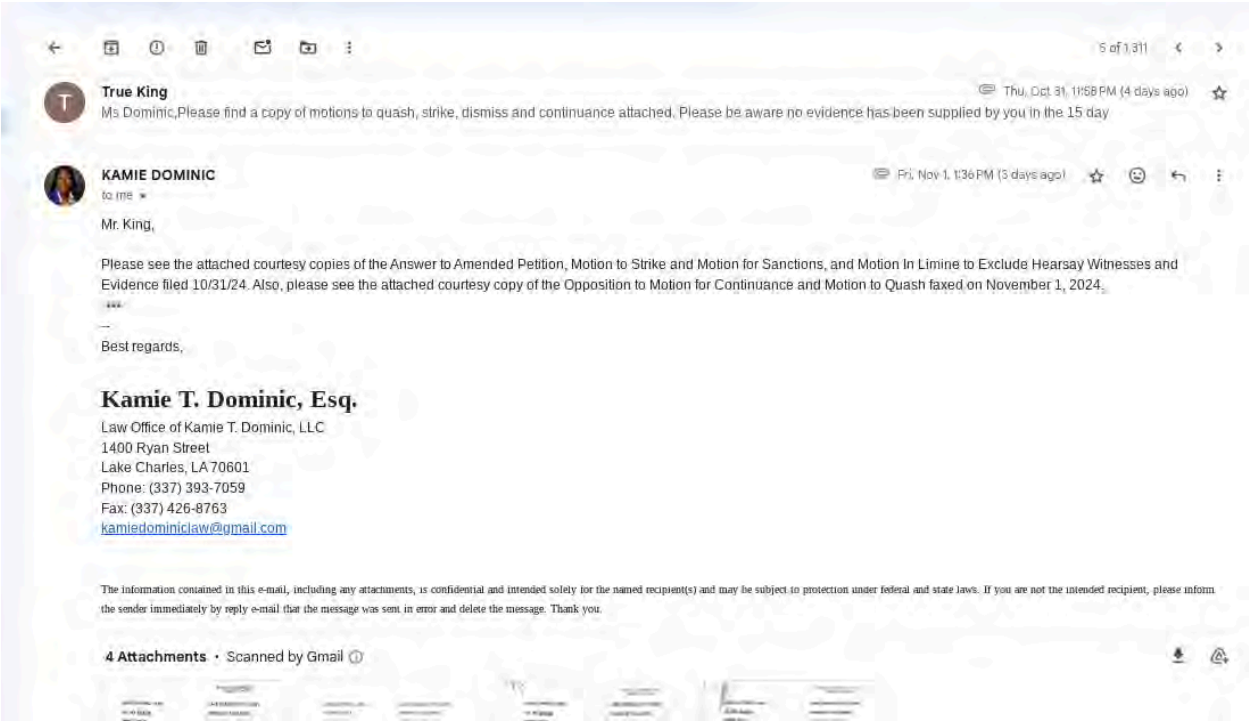
I was simply relaying the docket information provided to me from the court's clerk. I do now know what the subject of the motion or sanctions is.

Thanks,

Joe
Sent from my iPhone

> On Oct 31, 2024, at 1:14 PM, True King <truekingfile@gmail.com> wrote:

***



5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.
Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail

*** Medical Exhibits sent to Judge Richard and Kamie Dominic on Monday Nov 4, 2024 with request to be sealed.***

EXHIBITS SECTION #2 HARASSMENT OF COLSTON AND HER ATTORNEY ATTEMPTS AT UNETHICAL INVOLVEMENT IN COURT PROCEEDINGS AND UNDOCUMENTED ATTENDANCE AT CLOSED COURT HEARING FOR CASE #23-2124

Mail weekly sent to my mothers house. She goes to the post office and mails things to keep my mother and grandmother sick.
Charmaine does not recognize this behavior as insane or inappropriate seeing as though my wife has never met my children and has never even had a conversation with charmaine. This is years later after stealing the car and she does this and brags that there won't be justice for me or a punishment for her.

This is sick. This isn't a paramour, this is a mentally disturbed individual and Ms Dominic should remain ethical when dealing with victims. I hadn't seen Charmaine colston in person in 13 months at the time of car theft so how is that a paramour? I was married and living with my wife. It's more lies this is the harassment contributing to my seizures and paralysis and to discriminate against my gender is unethical and slander.



lies

Tyria's comment on your post

Tyria Guillory
I don't agree with him on make it work that is not good for a women or man that only wants control and not have a relationship for the kids. My nephew stayed with his kids mother regardless to the mental and physical abuse that he was hiding from his family. She cut him, burned him, she it him in the head with an object that left him with seizures. you have to do what is best for you, especially i... See more

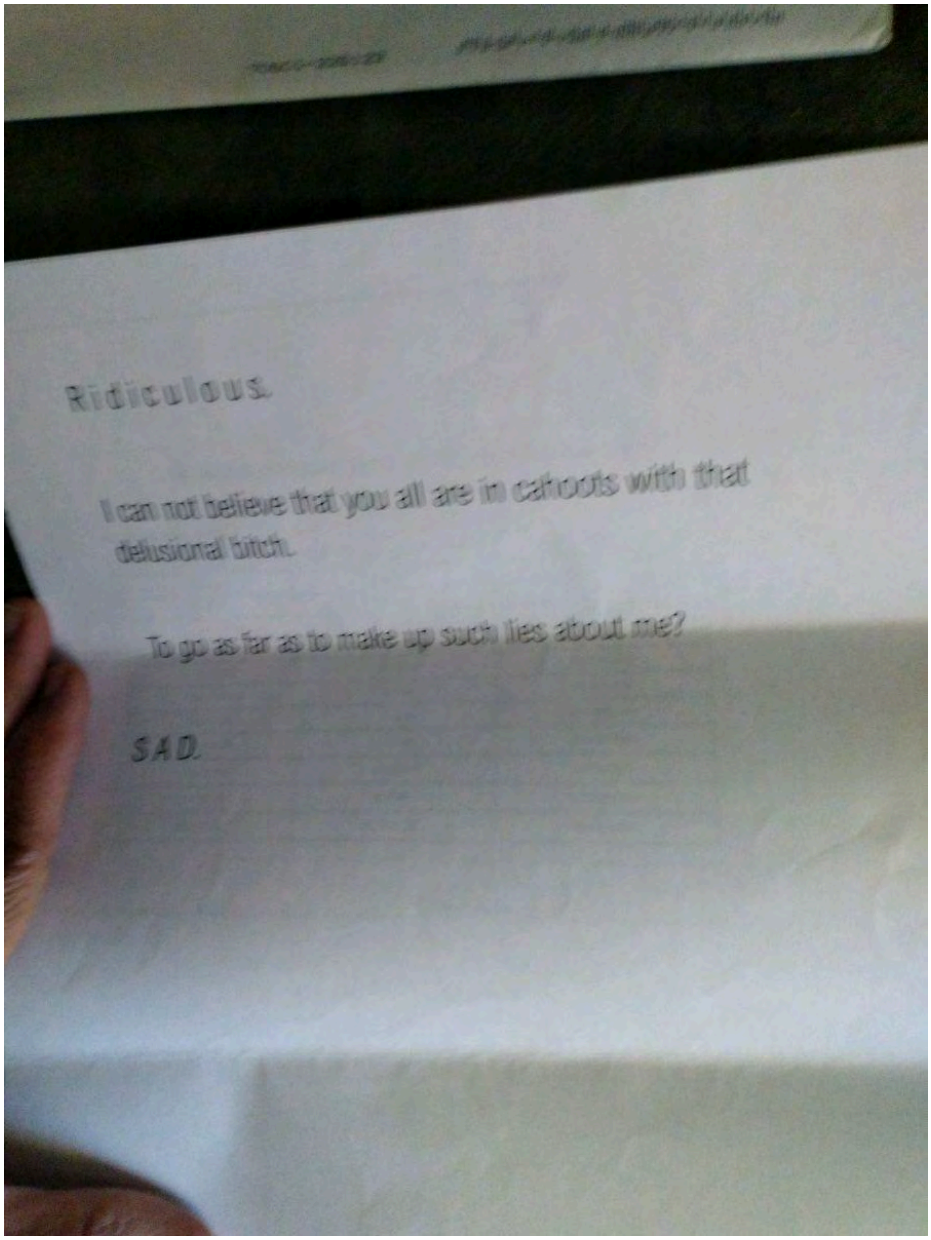
7h Like Reply 1

King Tay
Tyria Guillory I would settle for just keeping my photos, name, my likeness , my husbands god baby photos, shoot just don't post anyone that isn't posting you.

Or you will be subpoenaed to court if you deal with them and lose money off work...
-OR you will be accused of harassment. She gonna initiate every text, email, and mail stuff to your house "good morning ALL", as if you got a wedding ring t... See more

33m Like Reply


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123

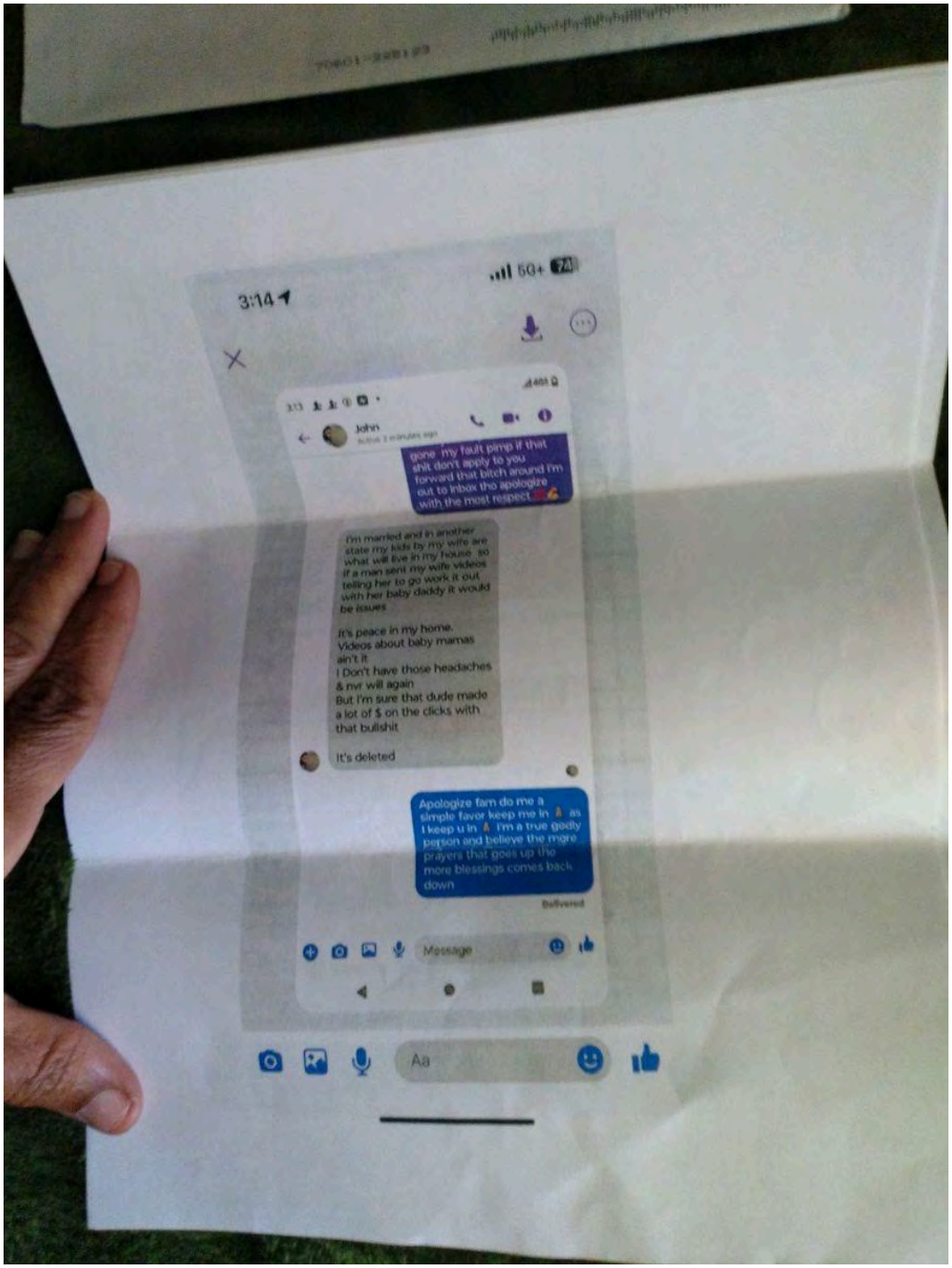


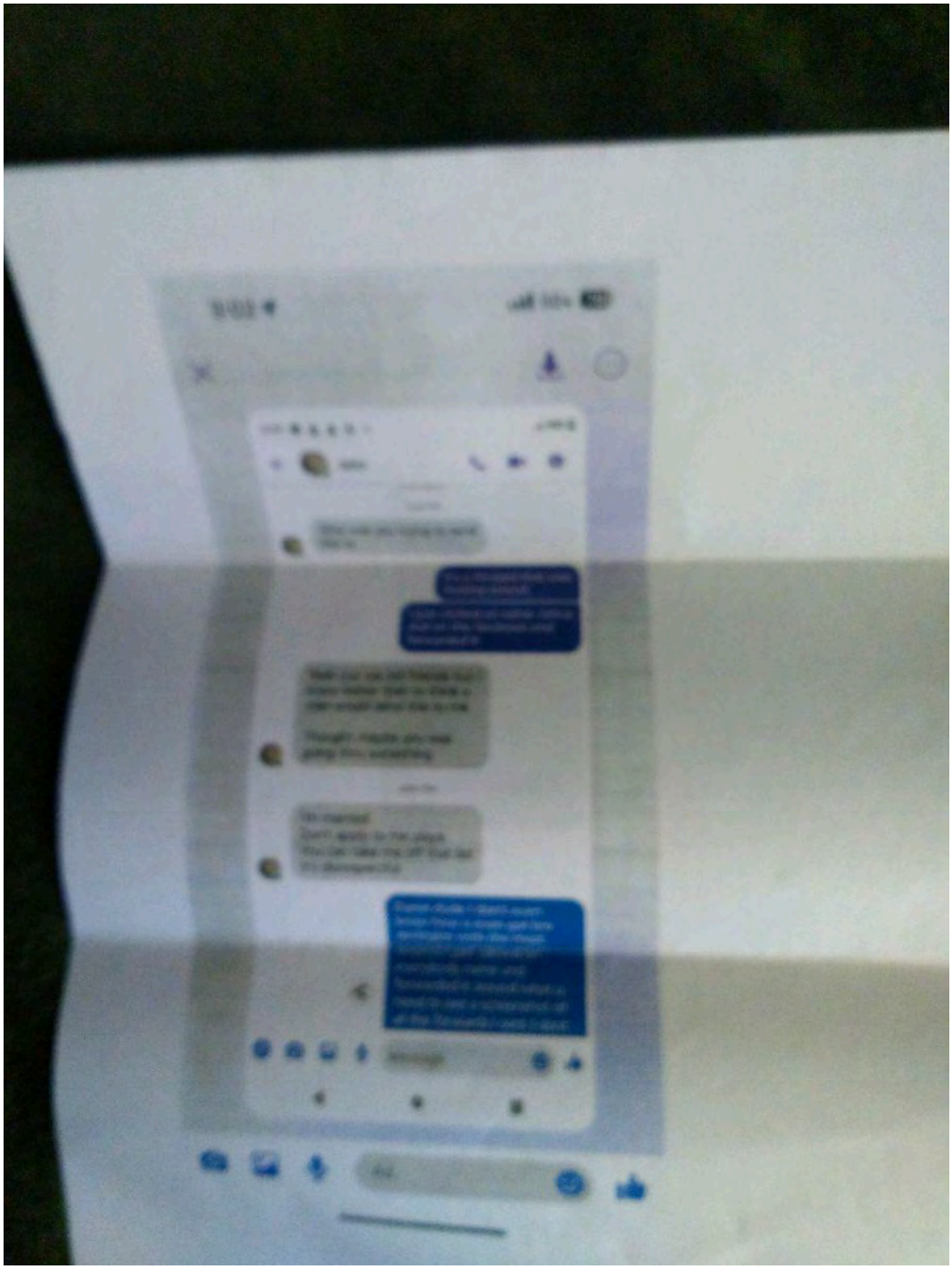
Ridiculous.

I can not believe that you all are in cahoots with that delusional bitch.

To go as far as to make up such lies about me?

SAD.

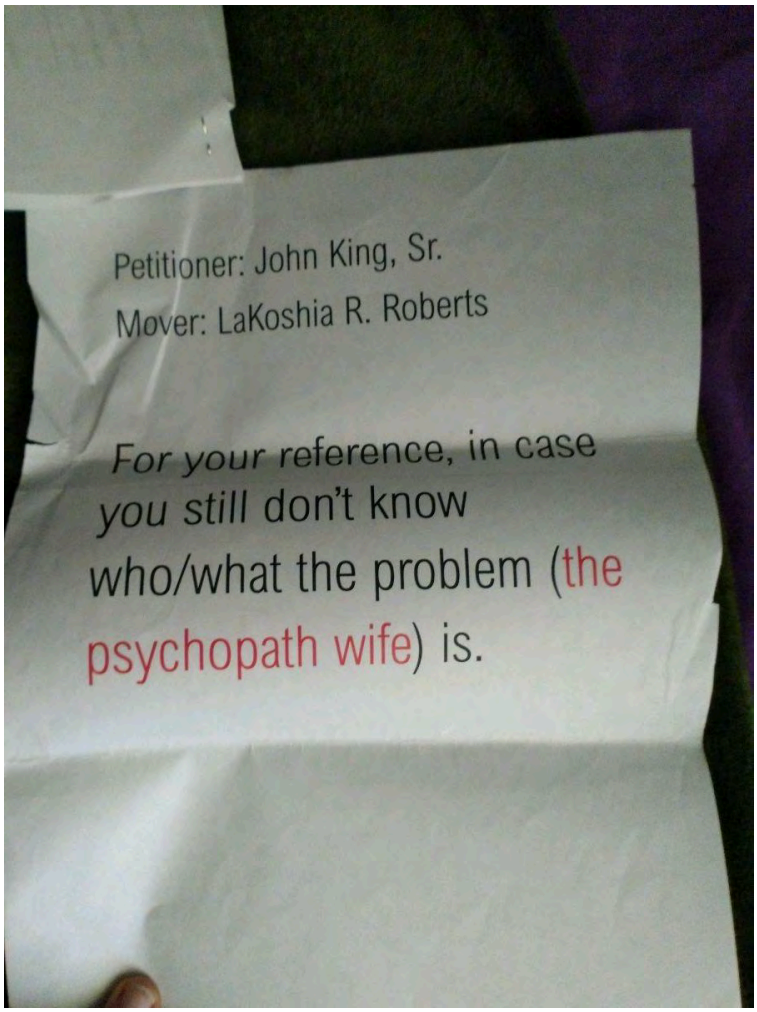

3:14
5G+
John
gone my fault pimp if that shit don't apply to you forward that bitch around I'm out to inbox tho apologize with the most respect
I'm married and in another state my kids by my wife are what will live in my house so if a man sent my wife videos telling her to go work it out with her baby daddy it would be issues
It's peace in my home. Videos about baby mamas ain't it
I Don't have those headaches & nvr will again
But I'm sure that dude made a lot of $ on the clicks with that bullshit
It's deleted
Apologize fam do me a simple favor keep me in 🙏 as I keep u in 🙏 I'm a true godly person and believe the more prayers that goes up the more blessings comes back down
Delivered
Message
Aa




King
921 Moss St.
Lake Charles, La 70601
BATON ROUGE LA 707
19 JUL 2024 PM 1 L
FREEDOM
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123


King
821 Moss St.
Lake Charles, LA 70601
BATON ROUGE LA 707
7 AUG 2024 PM 3 L
FREEDOM
Monica King Guillory
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123




Petitioner: John King, Sr.
Mover: LaKoshia R. Roberts
For your reference, in case you still don't know who/what the problem (the psychopath wife) is.


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave
Lake Charles, La 70601
70601-225123

John C. J. King

123 N. Louisiana Avenue

Lake Charles, LA, 70615

Truekingfile@gmail.com

318-995-6021

01-05-25

Judicial Commission of Louisiana

Subject: Judicial Complaint Against Judge Ron Richard

Lake Charles City Court Judge

Lake Charles, Louisiana

To Whom It May Concern,

I am submitting this formal complaint against the Honorable Judge Ron Richard of the City Court of Lake Charles, Louisiana, regarding conduct in Case No. 23-2124 (King v. Amos, The Hartford). This complaint arises from repeated incidents of judicial misconduct, bias, procedural irregularities, and actions that have resulted in severe harm to me and my family.

1. Basis for Complaint

Judge Richard has demonstrated persistent bias and unfair treatment throughout the proceedings, including:

- Judicial Bias & Prejudice: Making inappropriate comments, engaging in retaliatory behavior, and allowing ex parte communications that compromised my legal representation.

- Violation of Due Process: Denying me adequate notice for hearings, allowing opposing counsel to submit untimely motions, and proceeding without ensuring my legal representation.

- Endangerment of a Protected Witness: Ignoring my medical condition, requiring in-person appearances despite physical immobility, and disregarding my warnings about threats to my spouse’s safety, which ultimately resulted in a fatal incident.

- Procedural Misconduct: Improper courtroom procedures, misrepresentation by court clerks regarding counsel enrollment, and the use of fabricated addresses to harass my family.

2. Specific Incidents of Concern

1. Retaliatory Conduct: Judge Richard issued contempt charges against my spouse days after she sought medical treatment during a hearing, despite my seizure in court being ignored.

2. Ex Parte Communications & Intimidation: Legal counsel was dissuaded from representing me due to private discussions with the judge, violating ethical standards.

3. Unlawful Detention & Threats: My spouse was unlawfully detained in a sealed courtroom, denied restroom access, and threatened with incarceration despite not being on trial.

4. Failure to Act on Safety Warnings: I repeatedly warned the court that its negligence would lead to harm, which tragically resulted in a homicide directly tied to this case.

3. Request for Investigation & Action

Given these serious violations, I respectfully request the Judicial Commission to:

- Conduct a formal investigation into Judge Ron Richard's conduct in Case No. 23-2124.

- Review his actions for violations of judicial ethics, including bias, due process violations, and endangerment of a witness.

- Take appropriate disciplinary action to prevent further harm to litigants appearing before his court.

I have attached supporting documentation, including my motion to recuse Judge Richard, which outlines additional details. Please confirm receipt of this complaint and advise on any further steps necessary.

Sincerely,

John C. King Sr
123 N. Louisiana Avenue
Lake Charles La 70601
truekingfile@gmail.com

URGENT ATTN:
12/12/2024

IN THE CITY COURT OF LAKE CHARLES STATE OF LOUISIANA

John C. King Sr., Plaintiff/Defendant, v. Amos The Hartford, Defendant/Plaintiff.

CASE NO. 23-2124

EMERGENCY MOTION TO RECUSE/REMOVE HONORABLE JUDGE RON RICHARD

MOTION TO VACATE RETALIATORY JUDGMENTS

MOTION TO STRIKE AND SEAL IDENTIFYING INFORMATION FROM PUBLIC RECORD

MOTION TO INTERVENE TO PREVENT FURTHER JUDICIAL HARASSMENT AND LOSS OF LIFE

NOW INTO COURT, through undersigned counsel, comes John C. King, Pro Se litigant, respectfully moving this Honorable Court to:

1. Recuse the Honorable Judge Ron Richard from presiding over this matter due to bias, prejudice, and conduct endangering a protected witness.
2. Vacate retaliatory judgments against John & Shunte King.
3. Strike and seal identifying information of King and spouse from public record.
4. Intervene to prevent further judicial harassment and loss of life following preventable homicide occurring December 11, 2024 that was forewarned would be an attempt on the life and safety of Mrs King and was ignored.

I. FACTUAL BACKGROUND

1. The undersigned has raised concerns about Judge Richard's impartiality based on specific actions and comments that exhibit bias and prejudice against the Plaintiff.
2. Judge Richard's conduct includes, but is not limited to:
    - Allowing ex parte communications that intimidated existing legal counsel and dissuaded new counsel from enrolling.
    - Disregarding procedural rules, such as timely service and filing requirements, to the detriment of the Plaintiff.
    - Permitting opposing counsel to submit untimely and defamatory motions, including false allegations of infidelity, without evidence.
    - Endangering a protected witness by failing to consider Plaintiff's medical condition and imposing unreasonable demands for in-person appearances despite physical immobility.
3. These actions have resulted in loss of legal representation, procedural disadvantages, and endangerment to Plaintiff's life and safety.

4. Specific incidents include:
    - Misrepresentation by court clerks regarding enrollment of counsel.
    - Improper courtroom presence of unrecorded non-parties, such as Orelia Lawdins-Trent.
    - Denial of motions submitted via alternative means during technical failures at the clerk's office.
    - False claims of practicing law brought against Plaintiff’s spouse, Shunte King, resulting in financial abuse due to unnecessary travel expenses and threats by the District Attorney, only to later find no evidence of such claims.
    - Retaliatory contempt charges filed seven days after Plaintiff’s spouse sought medical care during court proceedings, despite Plaintiff suffering a seizure in the courtroom and Judge Richard refusing required medical breaks. These actions resulted in permanent nerve damage to Plaintiff.
    - Holding immediate hearings without notice or legal representation for the accused, in violation of due process rights.
    - Engaging in unlawful detention by sealing the courtroom, preventing Plaintiff’s spouse from leaving post-proceedings, denying restroom access, and threatening incarceration despite her not being on trial or subpoenaed, and not residing in Judge Richard’s jurisdiction.
    - Making references to unrelated cases involving other judges and asserting that Plaintiff did not fear for his life, despite being warned that such recklessness would lead to harm. This resulted in a homicide three weeks later, directly tied to the warnings issued to Judge Richard.
    - Referencing Plaintiff’s social media and engaging in discriminatory retaliation, which endangered Plaintiff’s spouse, Shunte King, who later experienced an attempt on her life at her home, resulting in one fatality.
    - Inconsistent application of judgment, such as refusing to serve Charmaine Coslton at her attorney's office while insisting on serving Plaintiff’s spouse, a non-Louisiana resident, on November 21, 2024, at Attorney Schrumpf’s office. Schrumpf had explicitly stated in writing that he did not represent Mrs. King, making the service ineffective.
    - Judge Richard repeatedly attempted to serve Mrs. King at improper addresses, including fabricated addresses in Iowa, Louisiana, solely to inflate fees and harass Plaintiff’s family.

II. LEGAL GROUNDS FOR RECUSAL

4. Pursuant to Louisiana Code of Civil Procedure Article 151, a judge shall be recused if:
    - They exhibit personal bias or prejudice concerning a party.
    - Their impartiality might reasonably be questioned due to their actions or comments.
5. Canon 3E of the Louisiana Code of Judicial Conduct mandates judges to disqualify themselves in any proceeding where their impartiality might reasonably be questioned.
6. The following evidence supports the need for recusal:
    - Disregard for Plaintiff's procedural and substantive rights.
    - Actions and comments that create a perception of bias and unfair treatment.
    - Endangerment of Plaintiff's health and safety due to unreasonable judicial orders.

III. SPECIFIC CLAIMS AND SUPPORTING LAWS

1. Judicial Bias:

- Inappropriate comments and unequal treatment.
- Louisiana Code of Civil Procedure Article 151 and Canon 3E of the Louisiana Code of Judicial Conduct.

2. Procedural Misconduct:

- Failure to enforce timely filing and service requirements (La. Code Civ. Proc. art. 1313).
- Allowing unsubstantiated claims to enter the record, causing potential harm to Plaintiff's legal and financial standing.

3. Endangerment of Witness Safety:

- Refusal to accommodate Plaintiff's medical condition for remote appearances, violating constitutional rights to due process and safety.
- Relevant federal protections under the Americans with Disabilities Act (ADA) and HIPAA.

4. Improper Service:

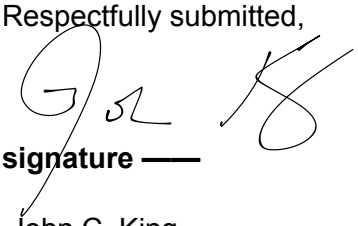
- Serving non-residents at incorrect or fabricated addresses in violation of La. Code Civ. Proc. art. 1231.
- Ignoring written statements from legal counsel regarding representation and jurisdiction.

IV. REQUEST FOR RELIEF

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests this Honorable Court to:

1. Recuse the Honorable Judge Ron Richard from all proceedings related to this matter.
2. Vacate all retaliatory judgments against John & Shunte King.
3. Strike and seal identifying information of Plaintiff and spouse from the public record to ensure their safety.
4. Intervene to prevent further judicial harassment, ensure a fair trial, and protect Plaintiff's constitutional rights.
5. Reverse all unjustified fees resulting from retaliatory judgments.
6. Amend existing judgment to require Renee Amos to pay her own court costs.

Respectfully submitted,



signature ——

John C. King

123 N. Louisiana Avenue

Lake Charles, LA 70601

truekingfile@gmail.com

318.995.1705

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was served upon all parties or their counsel of record via email or fax on this —— day of ——, 20——. 12th Day of December, 2024

signature ——

John C. King

ORDER

Considering the foregoing motion:

IT IS HEREBY ORDERED that:

1. The Honorable Judge Ron Richard is recused from presiding over any further proceedings in this matter.
2. All retaliatory judgments against John & Shunte King are vacated.
3. Identifying information of Plaintiff and spouse shall be stricken and sealed from public records.
4. All unjustified fees resulting from retaliatory judgments are reversed.
5. The existing judgment is amended to require Renee Amos to pay her own court costs.

SIGNED this —— day of ——, 20——.

HONORABLE JUDGE, Calcasieu Parish, Louisiana

URGENT ATTN:
12/12/2024

IN THE CITY COURT OF LAKE CHARLES STATE OF LOUISIANA

John C. King Sr., Plaintiff/Defendant, v. Amos The Hartford, Defendant/Plaintiff.

CASE NO. 23-2124

EMERGENCY MOTION TO RECUSE/REMOVE HONORABLE JUDGE RON RICHARD

MOTION TO VACATE RETALIATORY JUDGMENTS

MOTION TO STRIKE AND SEAL IDENTIFYING INFORMATION FROM PUBLIC RECORD

MOTION TO INTERVENE TO PREVENT FURTHER JUDICIAL HARASSMENT AND LOSS OF LIFE

NOW INTO COURT, through undersigned counsel, comes John C. King, Pro Se litigant, respectfully moving this Honorable Court to:

1. Recuse the Honorable Judge Ron Richard from presiding over this matter due to bias, prejudice, and conduct endangering a protected witness.
2. Vacate retaliatory judgments against John & Shunte King.
3. Strike and seal identifying information of King and spouse from public record.
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I. FACTUAL BACKGROUND

1. The undersigned has raised concerns about Judge Richard's impartiality based on specific actions and comments that exhibit bias and prejudice against the Plaintiff.
2. Judge Richard's conduct includes, but is not limited to:
    - Allowing ex parte communications that intimidated existing legal counsel and dissuaded new counsel from enrolling.
    - Disregarding procedural rules, such as timely service and filing requirements, to the detriment of the Plaintiff.
    - Permitting opposing counsel to submit untimely and defamatory motions, including false allegations of infidelity, without evidence.
    - Endangering a protected witness by failing to consider Plaintiff's medical condition and imposing unreasonable demands for in-person appearances despite physical immobility.
3. These actions have resulted in loss of legal representation, procedural disadvantages, and endangerment to Plaintiff's life and safety.

4. Specific incidents include:
    - Misrepresentation by court clerks regarding enrollment of counsel.
    - Improper courtroom presence of unrecorded non-parties, such as Orelia Lawdins-Trent.
    - Denial of motions submitted via alternative means during technical failures at the clerk's office.
    - False claims of practicing law brought against Plaintiff’s spouse, Shunte King, resulting in financial abuse due to unnecessary travel expenses and threats by the District Attorney, only to later find no evidence of such claims.
    - Retaliatory contempt charges filed seven days after Plaintiff’s spouse sought medical care during court proceedings, despite Plaintiff suffering a seizure in the courtroom and Judge Richard refusing required medical breaks. These actions resulted in permanent nerve damage to Plaintiff.
    - Holding immediate hearings without notice or legal representation for the accused, in violation of due process rights.
    - Engaging in unlawful detention by sealing the courtroom, preventing Plaintiff’s spouse from leaving post-proceedings, denying restroom access, and threatening incarceration despite her not being on trial or subpoenaed, and not residing in Judge Richard’s jurisdiction.
    - Making references to unrelated cases involving other judges and asserting that Plaintiff did not fear for his life, despite being warned that such recklessness would lead to harm. This resulted in a homicide three weeks later, directly tied to the warnings issued to Judge Richard.
    - Referencing Plaintiff’s social media and engaging in discriminatory retaliation, which endangered Plaintiff’s spouse, Shunte King, who later experienced an attempt on her life at her home, resulting in one fatality.
    - Inconsistent application of judgment, such as refusing to serve Charmaine Coslton at her attorney's office while insisting on serving Plaintiff’s spouse, a non-Louisiana resident, on November 21, 2024, at Attorney Schrumpf’s office. Schrumpf had explicitly stated in writing that he did not represent Mrs. King, making the service ineffective.
    - Judge Richard repeatedly attempted to serve Mrs. King at improper addresses, including fabricated addresses in Iowa, Louisiana, solely to inflate fees and harass Plaintiff’s family.

II. LEGAL GROUNDS FOR RECUSAL

4. Pursuant to Louisiana Code of Civil Procedure Article 151, a judge shall be recused if:
    - They exhibit personal bias or prejudice concerning a party.
    - Their impartiality might reasonably be questioned due to their actions or comments.
5. Canon 3E of the Louisiana Code of Judicial Conduct mandates judges to disqualify themselves in any proceeding where their impartiality might reasonably be questioned.
6. The following evidence supports the need for recusal:
    - Disregard for Plaintiff's procedural and substantive rights.
    - Actions and comments that create a perception of bias and unfair treatment.
    - Endangerment of Plaintiff's health and safety due to unreasonable judicial orders.

III. SPECIFIC CLAIMS AND SUPPORTING LAWS

1. Judicial Bias:

- Inappropriate comments and unequal treatment.
- Louisiana Code of Civil Procedure Article 151 and Canon 3E of the Louisiana Code of Judicial Conduct.

2. Procedural Misconduct:

- Failure to enforce timely filing and service requirements (La. Code Civ. Proc. art. 1313).
- Allowing unsubstantiated claims to enter the record, causing potential harm to Plaintiff's legal and financial standing.

3. Endangerment of Witness Safety:

- Refusal to accommodate Plaintiff's medical condition for remote appearances, violating constitutional rights to due process and safety.
- Relevant federal protections under the Americans with Disabilities Act (ADA) and HIPAA.

4. Improper Service:

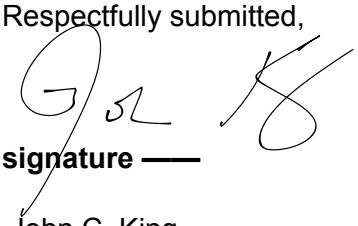
- Serving non-residents at incorrect or fabricated addresses in violation of La. Code Civ. Proc. art. 1231.
- Ignoring written statements from legal counsel regarding representation and jurisdiction.

IV. REQUEST FOR RELIEF

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests this Honorable Court to:

1. Recuse the Honorable Judge Ron Richard from all proceedings related to this matter.
2. Vacate all retaliatory judgments against John & Shunte King.
3. Strike and seal identifying information of Plaintiff and spouse from the public record to ensure their safety.
4. Intervene to prevent further judicial harassment, ensure a fair trial, and protect Plaintiff's constitutional rights.
5. Reverse all unjustified fees resulting from retaliatory judgments.
6. Amend existing judgment to require Renee Amos to pay her own court costs.

Respectfully submitted,



signature ——

John C. King

123 N. Louisiana Avenue

Lake Charles, LA 70601

truekingfile@gmail.com

318.995.1705

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was served upon all parties or their counsel of record via email or fax on this —— day of ——, 20——. 12th Day of December, 2024

signature ——

John C. King

ORDER

Considering the foregoing motion:

IT IS HEREBY ORDERED that:

1. The Honorable Judge Ron Richard is recused from presiding over any further proceedings in this matter.
2. All retaliatory judgments against John & Shunte King are vacated.
3. Identifying information of Plaintiff and spouse shall be stricken and sealed from public records.
4. All unjustified fees resulting from retaliatory judgments are reversed.
5. The existing judgment is amended to require Renee Amos to pay her own court costs.

SIGNED this —— day of ——, 20——.

HONORABLE JUDGE, Calcasieu Parish, Louisiana

Tuesday, November 19, 2024

CITY COURT
City of Lake Charles, Louisiana

P.O. Box 1664
Lake Charles, Louisiana 70602
(337) 491-1564

Hearing NOTICE

Plaintiff **KING, JOHN CLIFFORD J**

ATTN: OLIVER JACKSON SCHRUMPF
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

JOHN CLIFFORD J KING

VS SuitNo: **23-2124**

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Contempt of Court on Shunte King

Please be advised that the above numbered and entitled cause has been fixed for **Hearing** at **9:00 AM** on **Wednesday, January 22, 2025**, in the City Court Building located at **118 West Mill Street, Lake Charles, La.**

Should you need witnesses, please furnish us with the name and addresses at least 1 (one week in advance of the trial date. We require advance deposit to cover service and witness fees

If you have any type of audio/visual presentation, please contact our office at (337) 491-1564 to set up or got to www.lccitycourt.org for instructions.

Clerk

RECD LC CITY COURT CIV
'24 NOV 15 PM 3:38

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS. NO. 23-2124	:	WARD 3, CALCASIEU PARISH
RENEE AMOS NOTARY PUBLIC ID# 29374	:	STATE OF LOUISIANA
FILED: 11-15-2024	:	M Clerk ~~DEPUTY~~ CLERK OF COURT

RULE TO SHOW CAUSE

SHUNTE KING (a non-party in the referenced matter) is hereby ordered to appear on the 22nd day of January, 2025 at 9:00 o'clock A.m., to show cause why she should not be held in contempt of court, pursuant to LSA – C.C.P. Art. 222, based on the following:

1. Willful disobedience of any lawful judgment, order, mandate, writ, or process of court (La C.C.P. Art. 224(2)); specifically, Shunte King willfully interrupted the course of the November 14, 2024 hearing on a contempt of court charge lodged against her husband, plaintiff John Clifford J King. Shunte King willfully and knowingly and unlawfully called 911 in an effort to remove her husband, John Clifford J King from the courtroom while under direct examination by Judge Ronald C. Richard. Shunte King intentionally and willfully disrupted and interfered with court proceedings.

SIGNED this 15th day of November, 2024.

RONALD C. RICHARD
JUDGE, DIVISION B

A TRUE COPY
Date: 11-19-2024
Clerk

Gmail

True King <truekingfile@gmail.com>

From Judge Ronald C. Richard re: King Contempt of Court

Oliver Schrumpf <oschrumpf@schrumpf-law.com> Fri, Nov 22, 2024 at 11:58 AM
To: Kay Bang <kay.bang@lccitycourt.org>, <truekingfile@gmail.com>
Cc: KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>, Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

I do not represent Mr. King nor Mrs. King regarding any alleged contempt of court matter. My representation was strictly on the claim against Renee Amos. Please remove me from further correspondence on issues of contempt.

Oliver “Jackson” Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

[Quoted text hidden]

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

***Amended to include evidence of grounds for Judicial Intervention due to what appears to be efforts of judicial bias that may be known to Judge Richard. There have been repeated efforts to intimidate existing counsels, and dissuade new counsel from enrolling into the case by means of ex parte communications. Efforts to deny rights to legal counsel, documented multiple attorneys have attempted to enroll and have been dissuaded by the clerk's office with misleading rhetoric. Special privileges such as the attendance of Orelia Lawdins - Trent legal counsel for Charmaine Y. Colston whom I am a registered domestic violence victim and continue to suffer harassment and stalking examples of this are seen in the Court Records for case #23-2124 as Charmaine Y Colstons attorney said she could not be served as she was not party to the case however the documents she requested by conformed copy mailed to her are in fact grounds for adequate service as Charmaine Colston herself requested the documents. Her then attorney was allowed to attend closed proceedings for the trial on May 21, 2024 prior to a non related family court trial on May 25, 2024 and her presence was inaccurately not recorded into the record as required by law as all non interested parties were asked to be removed from the courtroom and she was not enrolled as council nor was she a witness and this violation was permitted .

Clerk's office denies ever speaking to any attorneys but their efforts to enroll have happened repeatedly since July and they were told Judge Richard is unhappy (refer to evidence and exhibit attached) please refer to documented emails and subpoenas that show at least 5 separate attorneys were either intimidated, told misinformation, told information with intent to dissuade enrollment. There is also the disregard of the untimely filed motions of Kamie Dominic on Oct 31, 2024 where she was required by law to serve concurrently upon both Judge Richard and the plaintiff John King Sr her motions and arguments and she did not. Counsel was allowed to make defamatory lies of infidelity in Kings marriage claiming involvement of a paramour where no such paramour exists. Refer to Louisiana legal definition of paramour, (current sexual / romantic nature person of interest or mistress) how can this be when King was cohabitating with spouse and married at the time the negligence and fraud by Amos occurred ? Additionally all ex girlfriends cannot be considered paramours and Colston is not the immediate preceding romantic partner prior to Kings spouse. If there was a paramour by legal definition it would apply to any persons of romantic nature prior to current spouse, and post any involvement with

on/ off again relationship with ex girlfriend Charmaine Y Colston. In addition Ms Dominic leaves room for misinterpretation as she makes a salacious claim of paramour without any relevance to the case. She screams that Amos' reputation deserves consideration yet it is unethical and she has no evidence of any paramour as King had not seen Colston in person for 13 months prior to transfer of his vehicle illegally. Im asking that this line of Kamie Dominic petition be stricken from the record as it creates risk for King in future legal proceedings that either his current wife, or ex girlfriend can use Dominics petition as proof of an existing Paramour during the marriage and depending on state in which possible divorce proceedings could be filed this could have detrimental financial damaging effects to King.

Lastly and most importantly after reviewing this case with hospital attorney, and the policy of SW Airlines, United Airlines, TSA, Port Authority and the laws of HIPAA and the additional medical procedural protections allowed by the state of New Jersey to seek legal injunction and or restraining order if evidence of violation of civil rights exists or any order by an out of state judge poses immediate threat to patients life or standard of care. Judge Richards inability to consider zoom appearance on an immobile plaintiff who cannot meet clearance standards to fly prior to November 13, 2024 as right now a no fly order is in place for John King due to spinal cord swelling resulting in temporary paralysis and seizure. The request by Judge Richard to appear only in person less than 24 hours after admission for follow up care as documented in the patient chart is not only unreasonable but unconstitutional and deadly. No reasons have been provided as to why Kamie Dominic had 6 months to file her motions timely and she did not file within the 15 day window and did not file concurrently as required by law. As a result this intruded on my right to legal counsel. She also served me on November 1 a legal holiday and I have 7 days from that date to have a motion for continuance received by the clerk's office and Tracking number says the wet signature motions were received timely as Nov 1 was a legal holiday in the state of Louisiana.

Additionally, on November 6, 2024 repeated efforts to reach Lake Charles City Court were prevented as the fax and phone lines were down per Dominic, Bash and my wife Shunte King made repeated attempts to contact and was denied on dates of deadline. Additionally this happened on Oct 31, 2024 and I had to send evidence to Monica Abshire via email to be time stamped in time with exhibits and this was not permitted as Monica Abshire claims she could not see attachments to the notarized petition.

At this time and the lack of a status conference or any audio or court transcripts from prior proceedings how can Plaintiff defend the untimely motions presented by Kamie Dominic as all of the evidence points to some sort of bias in the proceedings as “Renee doesn't have a pot to piss in” has taken priority of the life and civil rights of plaintiff John King and requires the intervention of Judge Richard to stop the influences coming from the clerks office as more than one attorney has sent email complaints of clerks office unwillingness to send case file information, unwillingness to act in a timely fashion, and an eager willingness to share Judge Richard position and emotion towards case # 23-2124 which would be grounds for mistrial with the addition of Orelia Lawdins - Trents presence in the court room being left out of the minutes for a

closed hearing as well as Charmaine Colston by order of conformed copy received appropriate service from the clerk's office.

Dear Honorable Judge Richard,
After repeated denials of due process, and several attempts to deny a fair and balanced trial, and repeated ex parte communications, lack of service, and overall what appears to be an effort to provide Renee Amos with a documented unfair judicial advantage it is now necessary to file evidence and petition ito the record for case number #23-2124 and to serve in proceedings for medical intervention protections for grounds for appeal and for out of state judicial proceedings including but not limited medical injunctions to prevent ordered removal from the States of New York and New Jersey for which NJ/NY Port Authority, TSA, and state transportation guidelines for disabled transport are in place that prevent the transport of John C King Sr plaintiff for means of medical emergency.

Additionally as per the evidence attached opposing counsel is being granted liberties that are in violation of due process and Judge Richards own legal precedent that does not permit untimely served motions and evidence to be permitted unto the record. Please refer to

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant’s recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Tracking # 9505514194044309 63

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the "interest of justice" standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant's Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received

notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant’s claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant’s motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the ____ day of _____, 2024, at _____ o'clock AM, Lake Charles, Louisiana.

_____
signature

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

STATE OF LOUISIANA
PARISH OF CALCASIEU

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical

4. Exhibits to accompany motion to intervene to protect civil rights.

John C King Sr
!!/5/2024

ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX -

DATE: 02/06/2025

From: Heather Goleman, Deputy Clerk
(337) 433-9403

SUBJECT: Louisiana 3rd Circuit - Case No. CW 25 00044
Lower Court Case No.: 2023-2124
Calcasieu
Fourteenth Judicial District C

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

To: Hon. Ronald C. Richard
Attorney at Law
330 Alamo Street
Lake Charles, LA 70601
Fax No. (337) 494-1793
Work No. (337) 494-1900

Oliver Jackson Schrumpf
Schrumpf & Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson Schrumpf	Counsel for: John Clifford J. King
Edward Kelly Bauman	Counsel for: Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, . . . on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider . . . motions [regarding pauper status]" *Mason v. Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v. Ferrington*, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of the order of appeal, the trial court does not have jurisdiction to hear the pro se

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0002/0003 F-327

motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

SJG JWP CD

SJG JWP CD

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0003/0003 F-827

ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX -

DATE: 02/06/2025

From: Heather Goleman, Deputy Clerk
(337) 433-9403

SUBJECT: Louisiana 3rd Circuit - Case No. CW 25 00044
Lower Court Case No.: 2023-2124
Calcasieu
Fourteenth Judicial District C

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

To: Hon. Ronald C. Richard
Attorney at Law
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Fax No. (337) 494-1793
Work No. (337) 494-1900

Oliver Jackson Schrumpf
Schrumpf & Schrumpf
3801 Maplewood Dr.
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Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson Schrumpf	Counsel for: John Clifford J. King
Edward Kelly Bauman	Counsel for: Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, . . . on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider . . . motions [regarding pauper status]" *Mason v. Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v. Ferrington*, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of the order of appeal, the trial court does not have jurisdiction to hear the pro se

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0002/0003 F-327

motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

SJG JWP CD

SJG JWP CD

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0003/0003 F-827

COURT OF APPEAL

THIRD CIRCUIT

STATE OF LOUISIANA

NO.

JOHN CLIFFORD J. KING

Plaintiff/applicant

VERSUS

RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY

Defendants-respondents

APPLICATION FOR WRIT OF REVIEW TO THE THIRD CIRCUIT
COURT OF APPEAL

NO.

FROM THE WARD 3 / LAKE CHARLES CITY COURT PARISH OF
CALCASIEU, STATE OF LOUISIANA NO. 23-2124

HONORABLE RON RICHARD, PRESIDING

ORIGINAL APPLICATION AND BRIEF OF PLAINTIFF- APPLICANT,
JOHN CLIFFORD J. KING,
FOR WRIT OF REVIEW TO THE LAKE CHARLES CITY COURT And REQUEST FOR EXPEDITED CONSIDERATION And STAY

A CIVIL CASE

Respectfully
submitted:

Oliver Schrumpf

Oliver "Jackson" Schrumpf"
Attorney for Applicant
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
Appeal Counsel
Bar Roll No. 11832

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I. APPLICATION FOR WRIT OF CERTIORARI

The application of JOHN CLIFFORD J. KING, plaintiff, and Oliver Schrumpf, Attorney, respectfully represents:

A. Applicant is aggrieved by the orders of the Honorable Ronald Richard, Ward 3 / Lake Charles City Court Judge on December 30, 2024 and applicant *is* entitled to have this honorable court grant a supervisory writ to review and reverse those orders.

B. A statement of the considerations required by Rule 4-5 C. of the Uniform Rules of Courts of Appeal, a memorandum setting forth the statement of the case, an assignment of errors, a summary of the argument, and an argument addressing the assignments of error on the facts and law; a verification of the application, and appendix containing the requisite

exhibits, are all annexed here and made a part of this application.

A request for expedited consideration and stay of proceedings pending decision is attached.

Wherefore, applicant prays that after due consideration, in the discretion of this honorable court, that a supervisory writ be granted, and that thereafter the orders of the Ward 3/ Lake Charles City Court aggrieving applicant be reversed:

A. Reinstating the pauper status of John Clifford J. King, Plaintiff;

and

B. Staying further hearings pending the devolutive appeal.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF Attorney for applicant

Sworn to and subscribed before me this

Bla ne

Notary Public

Jinhifer L. LeBlanc
Notary No. 55493

23rd day of January, 2025.

REQUEST FOR EXPEDITED CONSIDERATION AND STAY OF PROCEEDINGS

The Trial Court has granted a stay suspending the Court's Order for counsel to appear on January 15, 2025 to represent John King and/or Shunte King in matters set by the Court for hearing (contempt and hearings on the motions filed by King In Proper Person), but counsel prays that this Court of Appeal grant expedited consideration of this application and stay all trial court proceedings pending decision on this application and eventually the devolutive appeal.

The trial Court's sua sponte retroactive rescission of its pauper order in this case will prevent the pauper plaintiff, John King, from pursuing a devolutive appeal unless this application is granted and the trial court order is reversed.

Additionally, the trial court is attempting to exert its control over the plaintiff (and plaintiff's spouse) who reside in New Jersey, by ordering local

counsel to appear at hearings for which Counsel does not represent the plaintiff and for which counsel will not be compensated.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

II. STATEMENT OF THE CONSIDERATIONS WARRANTING THE GRANTING OF WRITS

A. **Orders issued after jurisdiction divested.**

A judgment was rendered on November 14, 2024, after trial on the merits. The judgment denying all of plaintiff's requested relief was signed on November 21, 2024.

In

An order of appeal was entered on December 3, 2024 granting a Devolutive appeal from the Judgment dated November 21, 2024. accordance with La. C.C.P. 2088, jurisdiction is "divested" except for certain limited exceptions (none pertinent here). On December 30, 2024, the Court issued orders not allowed under La. C.C.P. 2088.

(1) Retroactively rescinding the Order granting plaintiff Pauper status, and

(2) Ordering Oliver Schrumpf to represent the plaintiff in contempt proceedings for pleadings and communications made by plaintiffs with court personnel before and after the appeal was entered.

B. **Interference with Attorney-Client** contract.

Despite the jurisdiction of the Court being divested, the Trial Court ordered counsel for John King in the primary case (King vs Amos and Hartford) to appear on December 30, 2024 without any advance notice of what issues were to be heard; and then on December 30, 2024 ordered counsel to appear again on January 15, 2025, [Apparently, post trial, John King filed pleadings In Proper Person after the trial court jurisdiction was

divested and the Court wants to hold King in Contempt for the allegations

being made by King or the Court wants counsel to represent King in the claims King made In Proper Person. [The trial Court should have merely declined to take any action since its jurisdiction is divested.] Counsel only represents John King on the claim against the Notary and her bonding company for executing a bill of sale when John King was in New Jersey or New York and not present in Lake Charles, La. Counsel has advised King to retain separate counsel for any contempt proceedings. But since King continues to reside in New Jersey, the Court is attempting to gain control over King through counsel in the core case. Counsel has less control over the actions of John King than the Court does.

C. **Sua Sponte Rescission of In Forma Pauperis order**.

Not only was jurisdiction of the Trial Court divested by the appeal

order, but the Trial Court then, without notice or contradictory hearing, announced that the Court was Sua Sponte Rescinding the previous order granting pauper status. The Court claimed grounds as Mr. King's spouse is not a "third party" suitable to sign the affidavit of poverty. {But see La. C.C.P. 5183, prohibiting only the party's **attorney** from signing as the third party.} The Trial Court also made reference to some out of court communication by King about attorney fees, but without advance notice, no opportunity for meaningful response was granted to plaintiff. The effect of rescinding pauper status is to require plaintiff to pay thousands of dollars in Court fees immediately in order to have the Trial Court's decision reviewed by the Court of Appeal, effectively denying plaintiff an appeal. Additionally, the Court is ordering counsel to represent King in matters that

counsel has not been retained to represent King in. This is taking time and

effort of counsel without compensation.

C. Why expedited granting of writs is appropriate in this case.

Plaintiff fully intends to pursue the devolutive appeal on the merits of

this case and believes that upon review, the Trial Court decision will be

reversed. However, the actions of the trial court, taken after jurisdiction

was divested, effectively deny plaintiff a right of appeal.

CONCLUSION:

The decisions of the Trial Court made on December 30, 2024 should be reversed:

A. John King's Pauper Status should be maintained.

B. Oliver Schrumpf should be relieved of the Order that he represent John King in contempt proceedings, or in issues filed In Proper Person by King after jurisdiction divested.

C. Further proceedings in the trial court should be stayed while the matter is heard by the Court of Appeal.

III. MEMORANDUM OF LAW

A. Statement of the Case and Prior Proceeding

FACTS:

John Clifford J. King contacted Oliver Schrumpf on October 31, 2024 requesting Schrumpf represent him in a case against a Louisiana Notary (Rene Amos) who had notarized a vehicle transfer of King's vehicle on September 7, 2021 at a time when the owner of the vehicle (John King) was out of the state of Louisiana (in New Jersey or New York). King e-mailed a

copy of the petition and a copy of the investigation report from the Calcasieu Parish Sheriff's office to Schrumpf. On November 6, 2024, Schrumpf agreed to represent King in the matter against the Notary. On November 7, 2024 Schrumpf filed a Motion to Enroll and a Motion to Continue the case (then set for trial on November 14, 2024). The trial court ordered Schrumpf to appear for a hearing that day (November 7, 2024) before authorizing the enrollment. Judge Ron Richard advised Schrumpf that John King had been filing ex parte communications with the Court making allegations that the Court did not appreciate and that the case had

been set for trial several times. The Court granted the enrollment but denied the Motion to Continue and confirmed that trial would occur on November 14, 2024. The Court also denied a request for plaintiff to appear via Zoom unless he could provide to the court an excuse signed by a physician by Monday, November 11, 2024 (*a* judicial holiday). Schrumpf advised his client that he must obtain a signed excuse from a doctor and have it to the Court by Monday, November 11, 2024 or make arrangements to be present for trial on November 14, 2024. The Court and Schrumpf's office were closed November 11, 2024 (Veteran's Day). King e-mailed a document signed by a doctor to the court on November 11, 2024, but, despite a back condition, managed to fly from New Jersey to Lake Charles to be present for the trial. The trial court found that Mr. King in deed was not in Lake Charles on the date the notary claimed she notarized his signature, but the court ruled against Mr. King on November 14, 2024, and signed a judgment denying his claim on November 21, 2024. The result of the trial is the

subject of a devolutive appeal granted December 3, 2024. However, this present Writ Application involves the Court's order for Schrumpf to appear for a hearing on December 30, 2024 after jurisdiction of the trial court had divested, and the Court's Sua Sponte rescission on December 30, 2024 of the Pauper Order previously entered in the case.

IV. ACTIONS BELOW:

A. On December 30, 2024, the Trial Court SUA SPONTE and without prior notice, rescinded its prior order granting pauper status to John King. This in effect denies King's right to appeal the decision on the merits of the case unless he can find several thousand dollars to pay costs within 20 days.

B. On December 30, 2024, the Trial Court Ordered Oliver Schrumpf to represent John King in contempt proceedings for filing of ex parte pleadings with the Lake Charles City Court on December 12, 2024 or at trial of the issues raised by those pleadings. The pleadings were filed by John King via e-mail. Even though King copied the pleadings to Schrumpf, Schrumpf neither assisted,

counseled, or even knew that the pleadings were being prepared or filed by King. Schrumpf did not contract to represent King on contempt charges or on the clams raised in those pleadings, and after the claims were brought to Schrumpf's attention by the Court, Schrumpf advised King he should contact an attorney with criminal law expertise to represent him on the contempt counts.

Schrumpf does not hold himself out as current in practicing criminal law.

V. SPECIFICATIONS OF ERROR AND ISSUES FOR REVIEW

A. The Trial Court erred in taking action after trial court jurisdiction divested to retroactively rescind the Pauper status of John King, thereby depriving the pauper plaintiff of a right of devolutive appeal.

B. The Trial Court erred in ordering attorney Oliver Schrumpf to defend

John King on charges for contempt of court or to try allegations raised in pleadings filed by John King In Proper Person which were done without knowledge, assistance, or counsel of attorney Schrumpf.

VI. SUMMARY OF ARGUMENT

A. **Pauper Status:** Jurisdiction of the trial court divested on December 3, 2024 with the granting of the devolutive appeal [See Order Granting Appeal, Appendix C and La. C.C.P. 2088]. Thereafter the trial court did not have jurisdiction to order counsel to a hearing on December 30, 2024 or to SUA SPONTE retroactively rescind the order granting pauper status to John King. {See transcript December 30, 2024, p. 21} Furthermore, the Court's reasoning for rescinding the Pauper Order was erroneous: Mrs. King is not a "third party disallowed from signing as an affiant". See La. C.C.P. 5183 A. (2). Additionally, the Court may only reconsider its original order granting the application "in a contradictory hearing" [La. C.C.P. 5183 B.

(3)]. This process would require notice and an opportunity to prepare for the hearing, which did not occur on December 30, 2024.

B. **Ordering Counsel to represent Mr. King in a Contempt Proceeding.**

When John King sent an e-mail to the Lake Charles City Court on December 12, 2024 (and copied the e-mail to Oliver Schrumpf), the Court was upset with Mr. King's conduct and wanted to punish him, but the Court did not have jurisdiction to entertain Mr. King's pleadings. The proper action of the Court would have been to decline to take any action on the pleadings until jurisdiction is returned to the trial court. Instead, the Court ordered Oliver Schrumpf to appear on December 30, 2024 and on that date, the Court Ordered Oliver Schrumpf to appear January 15, 2025 to defend John King on contempt charges and/or to represent Mr. King on the matters in his December 12, 2024 In Proper Person pleadings. Oliver Schrumpf did not counsel Mr. King to file the December 12, 2024 pleadings, did not prepare the pleadings, did not sign the pleadings, and did not know that Mr. King had in mind to file the pleadings. More importantly, Oliver Schrumpf did not contract to represent Mr. King on any of the claims made in his December 12, 2024 filing. The Court Ordering Oliver Schrumpf to pursue

claims on behalf of John King that Schrumpf did not contract to perform exceeds the authority of the Court. When jurisdiction is returned to the trial court, the Court may set *a* hearing and notify John King of the hearing date and if Mr. King appears in person or hires an attorney to represent him, the Court may then make rulings on Mr. Kings' pleadings as appropriate.

Oliver Schrumpf should not be commanded to use his time and effort to pursue matters he did not undertake in his agreement with Mr. King.

VII. ARGUMENT AND LAW

A. THE TRIAL COURT'S JURISDICTION OVER THE CASE DIVESTED WHEN THE ORDER OF DEVOLUTIVE APPEAL WAS GRANTED ON DECEMBER 3, 2024.

See Order granting Devolutive Appeal. Appendix C.

La. C.C.P 2088 provides:

Art. 2088. Divesting of jurisdiction of trial court

A. The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal and the timely filing of the appeal bond, in the case of a suspensive appeal or on the granting of the order of appeal, in the case of a devolutive appeal. Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following:

1433.

2125.

(1) Allow the taking of a deposition, as provided in Article

(2) Extend the return day of the appeal, as provided in Article

(3) Make, or permit the making of, a written narrative of the facts of the case, as provided in Article 2131.

(4) Correct any misstatement, irregularity, informality, or omission of the trial record, as provided in Article 2132.

(5) Test the solvency of the surety on the appeal bond as of the date of its filing or subsequently, consider objections to the form, substance, and sufficiency of the appeal bond, and permit the curing thereof, as provided in Articles 5123, 5124, and 5126.

(6) Grant an appeal to another party.

(7) Execute or give effect to the judgment when its execution or effect is not suspended by the appeal.

(8) Enter orders permitting the deposit of sums of money within the meaning of Article 4658.

(9) Impose the penalties provided by Article 2126, or dismiss the appeal, when the appellant fails to timely pay the estimated costs or the difference between the estimated costs and the actual costs of the appeal.

(10) Set and tax costs, expert witness fees, and attorney fees. (11) Certify a partial judgment or partial summary judgment in accordance with Article 1915(B).

(12) Amend a judgment to provide proper decretal language under Article 1918 or 1951.

B. In the case of a suspensive appeal, when the appeal bond is not timely filed and the suspensive appeal is thereby not perfected, the trial court maintains jurisdiction to convert the suspensive appeal to a devolutive appeal, except in an eviction case.

Amended by Acts 1964, No. 4, §1. Acts 1968, No. 128, §1. Acts 1977, No. 175, §1, eff. Jan. 1, 1978. Acts 1983, No. 126, §1; Acts 2008, No. 658, §1; Acts 2021, No. 259, §2.

Accordingly, the Trial Court had no authority to Sua Sponte rescind the In Forma Pauperis Order previously granted in the case, nor to Order Oliver Schrumpf to appear at hearings or to defend John King on contempt charges or pursue Mr. King's In Proper Person filings which occurred after the Court's jurisdiction had divested. The trial court should have simply declined to take any action on the In Proper Person pleadings filed by Mr. King after jurisdiction divested.

Alternatively, even if this Court finds that the trial court retained jurisdiction to reconsider the granting of the application for pauper status, the Court's ruling should be reversed because: the grounds stated are contrary to law: [Transcript of December 30, 2024 p. 21 the Court found that Mrs. King was "not a third party" as required by La. C.C.P. 5083]. In fact, La. C.C.P. 5083 A. (2) specifically states: "the affidavit of a third person other than the applicant's attorney...". Therefore, a spouse qualifies to sign the affidavit of poverty unless she is also "the applicant's attorney".

Finally, even if the Court of Appeal does not find fault with any of the foregoing, the statute allows the court to reconsider its original order

"on its own motion at any time **in a contradictory hearing.**" {La. C.C.P. 5083 B. (3). A contradictory hearing would provide notice and an opportunity to be heard which did not occur on December 30, 2024. Had there been notice of the issues to be considered (including reconsideration of pauper status), counsel may have been able to offer evidence to contradict the Court's claims. For instance, Mr. King did not have $12,000 to pay attorneys. But Mr. King may have received grants from civic organizations to help him pay attorneys because of the wrongs which had been done to him when his vehicle was stolen and a Louisiana Notary purportedly notarized his signature on September 7, 2021 at a time when Mr. King was in New Jersey or New York.

CONCLUSION

This application for supervisory writs should be granted to reverse the orders of the trial court on December 30, 2024: A. Retroactively rescinding the Pauper Status Order previously granted to John King; and B. Ordering Oliver Schrumpf to appear and represent John King on contempt or other matters raised in In Proper Person pleadings filed by John King after the Court's Jurisdiction had been divested.

Respectfully submitted by Attorney for Applicant, JOHN CLIFFORD J. KING and his attorney, Oliver Schrumpf

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF, Appeal Counsel

Bar Roll No. 11832

3801 Maplewood Drive

Sulphur, LA 70663

Phone: (337) 625-9077

VERIFICATION

I certify that the allegations in the foregoing application for writ of certiorari are true and correct, to the best of my knowledge, information, and belief, and that a copy of this application has been delivered to the Trial Judge, Ron Richard, via e-mail ron@lccitycourt.org

Date

and to the below listed counsel for defendant:

Ed Bauman via e-mail ed@lakecharlesattorney.com

Oliver Schrumpe

OLIVER "JACKSON" SCHRUMPF

•23rd

Sworn to and subscribed before me this

Leb

lon

Jinnifer L. LeBlanc
Notary No.
55493

Notary

day of January, 2025.

CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing Application for Writ of Review and for Stay has been served on the presiding trial judge and all opposing counsel, by depositing a copy in the U.S. Mail, postage prepaid, properly addressed to all counsel, and to the Third Circuit Court of Appeal, to wit:

Third Circuit Court of Appeal
Judges
P.O. Box 16577
Lake Charles, Louisiana 70616
by Hand Delivery

Ed Bauman
Counsel for Defendants,
Amos and Hartford
Lake Charles, La. 70602-3010
Via e-mail: ed@lakecharlesattorney.com

Judge RON RICHARD
ron@lccitycourt.org
Judge, Ward 3/Lake Charles City Court

Thus done at Sulphur, La. This 24 day of January, 2025.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

APPENDIX

TAB #

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A. Final Judgement November 21.2024 19-20

B. Motion for Devolutive Appeal 21

C. Order granting Devolutive Appeal December 3, 2024 22-23

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E. Motion to be Excused from Hearing denied by Judge 29-30

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MinuteID: 1869063

JOHN CLIFFORD J KING

STATE OF LOUISIANA, PARISH OF CALCASIEU CITY
COURT OF LAKE CHARLES

Vs. No.
23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 2937

You are hereby notified that a:

NOTICE OF

JUDGMENT

TO: **John** Clifford J King

Thru: Attorney Oliver Jackson Schrumpf
3801 Maplewood Drive
SULPHUR, Louislana

of said **Parish** Calcasieu

JUDGMENT

has **been** filed on

11/21/2024

11/19/2024

and signed by Judge Judge
Richard

.on.

in the above numbered and entitled cause as per certified copy attached heret

Witness the HONORABLE JAMIE B. **BICE** RONALD C. RICHARD**, Judges** of said **Court**,

this 21 day of November 2024

май

TRUE **COPY**

Deputy Clerk of **Court**

23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that Notice of Judgment was mailed to the plaintiff, John Clifford J King through attorney Oliver Jackson Schrumpf and to defendant, Renee Amos through attorney Kamie T. Dominic this 21st day of November 2024.

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CLER K

Ronald G. Richard

10 11-21-2004

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JOHN CLIFFORD J KING

:

RECD LG CITY COURT CIV

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LAKE CHARLES CITY COURT

VS. NO. 23-2124

RENEE AMOS
NOTARY PUBLIC
NOTARY ID #29374

FILED:
11-19-2014

PARISH OF CALCASIEU

STATE OF LOUISIANA

JUDGMENT

Malini

DEPUTY CLERK OF COURT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, **and** his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing

this matter and for reasons orally assigned, entered the following judgment:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT READ and SIGNED this 21st day of November 2024, in Lake Charles, Calcasieu Parish, Louisiana.

RON RICHARD, JUDGE DIVISION B JUDGE, LAKE CHARLES CITY COURT

Ronald G. Richard

AY QUE COPY 1846
1-21-2004
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Chork

JOHN CLIFFORD J KING

VERSUS NO. 2023-2124

WARD 3/LAKE CHARLES CITY COURT

PARISH OF CALCASTEU

RENEE AMOS NOTARY PUBLIC ID #29374

STATE OF LOUISIANA.

FILED:

122-2034

Malekin

DEPUTY CLERK OF COURT

MOTION AND ORDER FOR DEVOLUTIVE **APPEAL**

ON MOTION OF Oliver "Jackson" Schrumpf, counsel for John Clifford J King, plaintiff

herein, for a devolutive appeal from the judgment rendered November 14, 2024, read and signed

November 21, 2024**,** notice of which was mailed November 21, 2024, and from the judgment

(Ruling") denying plaintiff's claims against Renee Amos.

IT IS ORDERED that a devolutive appeal be and is hereby granted to John Clifford J King

and that the appeal be returnable to the Court of Appeal, Third Circuit, State of Louisiana, at Lake

Charles, Louisiana, upon payment *of* costs in accordance with law.

SO ORDERED *this* 3rd day of Decendo 2024, in Lake Charles,

Calcasieu Parish, Louisiana.

Prepared by:

JUDGE ROR RICHARD

Ronald G. Richard

BY:

Oliver

Schramgez

OLIVER JACKSON" SCHRUMPF #11832
SCHRUMPF LAW OFFICE,
A Professional Law
Corporation
3801 Maplewood *Drive*
Sulphur, Louisiana
70663
(337) 625-9077; Fax (337) 625-8231
oschrumpf@schrumpf-law.com

*:
.

12-3-2004 Math

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

FILED:
12/5/2004

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU

STATE OF LOUISIANA

Kinky Bay

DEPUTY CLERK

ORDER

Considering the petition for devolutive appeal wherein JOHN CLIFFORD J

KING was granted a devolutive appeal from the judgment rendered in the above entitled and numbered cause, returnable in the Court of Appeal, Third Circuit, State of Louisiana, on the 16th day of January, 2025.

Lake Charles, Louisiana, this 5th day of December, 2025.

RONALD RICHARD
CITY JUDGE,
DIVISION B

Suit No. **23-2124**

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a certified copy *of* the Motion and Order for Devolutive Appeal signed by Judge Ronald C. Richard has this 3rd day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

Malkie

CLERK

John C. J. King Sr.

Vs. No. 23-2124

Renee Amos

1-30.2024

FILED

LAKE CHARLES CITY COURT

WARD THREE

CALCASIEU PARISH

STATE OF LOUISIANA

жавий

TY CLERK OF COURT

In *Forma Pauperis* AFFIDAVIT

All questions must be answered in full.
Clients **of** Federally Chartered Legal **Services Corporations** only answer questions **1-8 and 11-13.**

1 Full Name John **C.** J. King Sr

Social Security No. 1934

Date of Birth 04-17-1986

Ser M

2. Address 123 N. Louisiana Ave. Lake Charles, LA

(Box **No.** or Street **Address)**
(**City**)

3. Telephone **No(s).**
318-995-1705

(Home**)**

(State and Zip **Code**)

(**Work**)

4. Are you a student**?** yes

If **so,** please indicate the name of the school **you are** attending**: Essex** Vocational and Technical

5. What is your occupation**?** Temoirary Disabled UnemploymentAre you employed**?** 6. **Injured**

Name of your employer
Address

None

N/A

How long have you been **so employed?**

Telephone No.

If unemployed, list the name of your last **employer** ETC If unemployed**,** how long have you been unemployed

6 Months

Monthly Wages

Federal Income **Tax 14944**

6. Income: Weekly Wages $0

$0

Monthly deductions:

Employer's

FICA

Other

deductions

Any others.

Încome

Is your income **less** than or equal to 125**%** of **the** federal poverty level**? yes**

7. Marital Status:

Single___Married

Separated_

How many children do you support who are under **18?** 3 How many children live with **you?** 2

Do you have **any** other dependents**?** relationship:

ELECTRONIC

FILE DATE:

7-30-2004

Divorced Widowed Concubine

State names, ages, and

24

Jayla King:15;daughter / **John** King Jr;14**;son /** Jakai King,**5;son**

Is your spouse employed**? No** spouse's **employer**

Graduate Student Spouse's
employer's address N/A
Telephone No. 318-995-1705

If so, please indicate the name **of** your

Wages**:**
Weeklys

Monthly **S**

8. Do you or your spouse receive any **of the following** income or **support?**

If so, please state the monthly amount:
SSIO
TANFO
Child support
Disability **0**
Workers **comp**
0
Rent Supplement ©
Unemployment benefits
Food **stamps**

9. **Do you own or** have **an** interest in any **of** the following**?** (Including community **property)**

House o
Value $0

Balance **owed** $0

Auto 0

Value $0

Balance owed $0

Truck **0**

Value $0

Balance owed 30

Watercraft

Value $D

Balance owed **$0**

Livestock 0

Value $0

Balance owed **$0**

Machinery

Value $0

Balance owed $0

Stock

Value **$0**

Bonds

Value $0

Certificates of Deposit

Value $0

Other immovable **property 2**

Equity $**0**

Debt $0

Value $0

Bank account

Name and location of bank**:**

Capital One

10. Please list your monthly expenses:

Rent 1600 Student Lot rent

Garbage

Electric 200

Medical expenses

Water Property taxes

House note

Telephone **90**

House ins.

Gas

Dental expenses_

Life ins.

120 Monthly Car note

Food

Barber/beauty

Car ins Entertainment

Cable

Med. ins.

Prescriptions

Transportation_

Child support_

Daycare

Cleaning **supplies**/toiletries

Support for children other than those of this marriage

Credit cards (List type of card and monthly payment**)**

Other

Garnishment

Discover			
Mastercard			
Visa			
Visa			
	$15500		
	$ **4000**		
	$ **2000**		
	$ 1800		
		200	
		150	
		220	
		140	

Loans **(**List the financial institution **and the** amount **you** pay monthly**)**

TOTAL MONTHLY EXPENSES **$ 2820**

$

$

11. **Does** anyone regularly help you pay your **expenses?** no

person's name and relationship to you N/A

If so, please state that

Do you have **any** additional income or assets that are not shown above**? If so**, please explain_

N/A

12. What arrangements have you made to **pay** your attorney's fee and what amount, **if** any have you paid**? (You** are required to answer fully**.)**

Pro-Se

13. Has your attorney **explained to** you that it is a crime punishable by imprisonment to intentionally give a false answer to any **of** the above questions**?** yes

State of Louisiana, **Parish** of **Calcasieu**

BEFORE ME, personally came and appeared_

who **after** being duly sworn, deposed and said that:

John C. 3'

Kiay SR

(S)he is a citizen of the United **States** of America **and** is presently **domiciled** in **and a** resident of Louisiana.

(S)he is the person who furnished the information **above**; **that (s)he** has signed the petition**;** that the information is furnished to the court for the purpose **of** requesting permission to litigate the **above** captioned lawsuit without **paying** the costs in advance or as they accrue or furnishing security therefor**.**

That the foregoing petition and that all allegations of fact therein contained **are** true and correct**;** and that because of his/her poverty and want of means**, (s)**he is unable to pay the costs of court in advance or as they accrue, nor is (**s**)he able to provide bond therefor.

3/

Applicant's Signature

NOTICE

Although you may be granted **the** privilege of proceeding without **prepayment of** costs, should judgment **be** rendered against you, YOUR **STATUS** AS A **PAUPER** DOES NOT RELIEVE YOU OF THE OBLIGATION TO PAY THESE COSTS.

The privilege to proceed **In** Forma Pauperis is restricted to litigants who are **clearly** entitled to do so, with due regard to the nature of the proceeding, the court costs which otherwise

would have to be **paid**, and the ability of the litigant to pay them ro **to** furnish security therefor, so that the indiscriminate filing of lawsuits may be **discouraged,** without depriving a litigant of the benefit of proceeding In Forma Pauperis **if (s)**he is entitled to **do**

SWORN **TO** AND SUBSCRIBED BEFORE ME, **a Notary Public in** Hudson County

Louisiana, this

New

Jersey

IMPRM MA

30

day of

ERDE WARDR, MA

20 24

Sale Medicum

Notary **Public**

THIRD PARTY AFFIDAVIT

The BEFORE ME, personally come and appeared Muple Jover King

who after being sworn, deposed **and** said **that (s)he knows** con CT hey ! well and that (s)he knows that because of his/her poverty **and** want of means, **(she** is unable to pay the costs of court in advance or as they accrue, nor is **(s)he** able to **provide** bond therefor.

JAKE **G** MULRENAN Notary **Public**, State of New Jersey Comm. **#50215247**
My Commission Expires
10/16/2028

Afiíap
t

SWORN TO AND SUBSCRIBED BEFORE ME, a Notary Public in

Hudson County

Lonistama, **this**

20

24. New

Jersey

30m

Notary Public

day

of

July

JAKE G MULRENAN
Notary Public, State **of** New Jersey Comm. # 50215247
My Commission Expires 10/16/2028

LEGAL SERVICES DECLARATION

BEFORE ME, personally came and appeared

who is a duly authorized representative of Acadiana Legal Services Corporation or Southwest Louisiana Legal Services, or a pro bono program receiving referrals from **one of** the aforementioned organizations, states that

has

produced evidence that (s)he **receives** public assistance benefits, or that **(s)he** has qualified to receive free legal services based on his/her income being **less** than or equal to **125**% of the federal poverty level and therefore is entitled to a rebuttable presumption that **(s)he is** entitled to the privilege of litigating without prior payment **of** costs.

Legal Services Representative

ORDER

Considering the foregoing petition and

affidavits:

IT **IS** HEREBY ORDERED that

be permitted **to** prosecute or defend this litigation in accordance with Louisiana Code of Civil Procedure Article **5181,** without **paying the** costs in advance or as they accrue or furnishing-**security** therefor.

Signed this
chambers

13th day
ading 2024

Lake Charles, Louisiana.

Ronald C. Richard

A TRUE COPY
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10-2015

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Clerk

FAX COVER SHEET

TO

COMPANY

FAX NUMBER

FROM

DATE

RE

COVER MESSAGE

Pauper **Affidavit**

Attn **Clerk** of Court

13374911303

John **King**

2024-05-20 20:56:37 GMT King vs **Amos 23-2124**

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IN RE: JOHN CLIFFORD J. KING

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REC'D LC CITY COURT CIV.
$24 DEC 19 PM2:29

Lake Charles City
Court

Calcasieu Parish,
Louisiana

TACT

Deputy Clerk of
Court

MOTION TO BE EXCUSED FROM **HEARING**

Now comes Oliver "Jackson" Schrumpf, attorney, individually, who respectfully shows:

1. On November 7, 2024, Movant enrolled as attorney for John King in the matter

entitled John King vs. Rene Amos, No. 2023-2124, Lake Charles City Court.

2. The King vs Amos matter was tried on November 14, 2024.

3. Judgment was signed in that matter **on** November 21, 2024 and Notice of Judgment

was mailed by the Clerk on the same day.

4. An order granting a devolutive appeal of that judgment was granted on December 5,

2024.

5. In accordance with La. C.C.P. Art. 2088. Divesting *of* jurisdiction of trial court:

on

A. The jurisdiction **of the** trial court **over all** matters in the case **reviewable**

under **the appeal** *is* divested, **and that** of the **appellate** court **attaches,**

the granting of the **order of appeal**, in **the case of a** devolutive **appeal**.

Thereafter, the trial court has jurisdiction in the case only over those matters not

reviewable under the appeal, including the right to do any of the following: (none

applicable in this
case).

6. Jolm King has subsequently filed other pleadings in Lake Charles City Court and

John King, and his wife, have been cited to appear in other matters not involving the

Judgment subject to appeal. (Even if the wording of the pleadings filed by King was

vague or ambiguous, or even if it intended to refer to the judgment in 2023-2124,

regardless, the Court would not have jurisdiction to take any action on that particular

matter because the jurisdiction of the Court is
"divested").

7. Oliver "Jackson Schrumpf does not represent the John King or Shunte King in the

contempt matters or any other matters other than the devolutive appeal in King vs.

Rene Amos, No. 2023-2124.

8. On December 18, 2024, after e-mail exchanges by the Judge's paralegal and Oliver

Schrumpf, the Court, Judge Ron Richard, called Oliver Schrumpf and, by telephone, ordered Schrumpf to appear at a hearing on December 30, 2024 at 9:00 AM. Schrumpf protested that he does not represent the Kings on the newly filed pleadings

or on the contempt matters. Judge Richard, nevertheless said that the King pleadings

sought recusal *of* the judge as to all judgments, which Judge Richard believes means

even the judgment described in paragraph 3 above.

9. As attorney for John King in the King vs. Rene Amos, No. 2023-2124, Oliver

Schrumpf here shows that the trial court's jurisdiction over that judgment has been

divested and no action can be taken as to that judgment by the trial court.

Accordingly, Oliver Schrumpf requests the Court rescind its order for Oliver

Schrumpf to appear on December 30, 2024 and excuse Oliver Schrumpf from

appearing, reserving to John King the right to retain other counsel to represent him in

that matter.

Respectfully Submitted
By

SCHRUMPF LAW OFFICE,
A PROFESSIONAL LAW CORPORATION

BY:

Olien
Schrumpf
OLIVER JACKSON" SCHRUMPF
LA Bar Roll No. 11832
3801 Maplewood
Drive Sulphur, LA
70663 Tel-337/625-9077
Fax-337-625-8231
oschrumpf@schrumpf-law.co
m

ORDER

Considering the foregoing Motion, let OLIVER "JACKSON" SCHRUMPF be excused from

SCH

RU

appearing at the hearing currently fixed *for* December 30/2024 at 9:00 AM.

SIGNED in Chambers in Lake Louisiana, on this day of

Decembe

r

2024.

RON RICHARD, CITY JUDGE

Suit **No. 23-2124**

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARÍSH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a copy of the Motion To Be Excused From Hearing DENIED by Judge Ronald C. Richard has this 27 day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

Mechani

CLERK

i

MINUTES OF THE COURT

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

DECEMBER 30, 2024

JUDGE RONALD C. RICHARD

Monica Abshire, Clerk

Arnold Bellow, Bailiff

Plaintiff, John Clifford J King, appears through attorney, Oliver Schrumpf

Defendant, Renee Amos Notary Public Notary *ID*# 29374 and Hartford Fire Insurance Company, appears through attorney Edward Bauman

COURT RULING:

The Court ruled that the four (4) motions filed by plaintiff John Clifford J King (not through *his* attorney) are fixed for hearing on Wednesday, January 15, 2025 at 9:00 a.m. and notice given to all parties in open court. The motions are: (1) Plaintiff's Emergency Motion to Recuse/Remove Honorable Judge Ron

Richard; (2) Plaintiff's Motion to Vacate Retaliatory Judgments; (3) Plaintiff's Motion to Strike and Seal Identifying Information from Public Record; and (4) Plaintiff's Motion to Intervene to Prevent Further Judicial Harassment and Loss of Life.

The Court ordered plaintiff's counsel, Oliver Schrumpf, to provide the plaintiff's New Jersey address to be sealed in an envelope for the Court only. Upon review of the address provided by Mr. Schrumpf, the Court rescinds the order as the address provided is already in the record (plaintiff's address on N. Louisiana Avenue in Lake Charles, LA).

The Court *sua* sponte rescinds the Order granting plaintiff's in forma pauperis status retroactive to the day of granting same, or August 13, 2024.

A TRUE COPY
1-10-2005
Maha
Date:

Clark

31 pages

LAKE CHARLES CITY COURT

118 West-Mill **Street** Lake **Charles**, LA 70601

STATEMENT

January 7, 2025

John Clifford J King

vs. 23-2124

Renee Amos Notary Public Notary ID# 29374

and

Hartford Fire Insurance Company

Transcript of testimony of hearing on December 30, 2024
Judge Ronald C. Richard

$ 170.50

paid in full

TA

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING

Plaintiff

*

*

NO. 23-2124

VERSUS

RENEE AMOS NOTARY PUBLIC

NOTARY ID# 29374

Defendant

* **** *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 30th day of December 2024, beginning at 9:00 a.m.

APPEARANCES

FOR THE PLAINTIFF,

JOHN CLIFFORD J KING:

OLIVER SCHRUMPF

SCHRUMPF LAW OFFICE, APLC 3801 MAPLEWOOD DRIVE

SULPHUR, LA 70663

(337) 625-9077

EMAIL:

oschrumpf@schrumpf-law.com

FOR THE DEFENDANTS,

RENEE AMOS NOTARY PUBLIC

NOTARY ID# 29374

and

HARTFORD FIRE INSURANCE COMPANY:

EDWARD K. BAUMAN

1801 RYAN STREET

LAKE CHARLES, LA 70601

(337) 491-0570

EMAIL:

ed@lakecharlesattorney.com

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PROCEEDINGS

* *

COURT CALLED TO ORDER

THE COURT:

co

Good morning everyone.

MR. SCHRUMPF:

Good morning Judge.

MR. BAUMAN:

Good morning Your Honor.

THE COURT:

Before we start court, I

would love
to recognize the
incredible
Miss Lois. Today is her 80th birthday. Miss
Lois, my intention,
uh,
since we had to
drag y'all
in today
for
this
special
fixing, my intention was to take you to
lunch
somewhere fancy but in light
of
Marshal Alcede's funeral, I would ask that
if I could take you to lunch maybe later
this week. All right. Okay. Calling the

23

matter of

let

me get

my

binders

24

unclipped

the matter

of,

uh,

John

25

Clifford King

good Lord, I can't find

one good style on this thing. Hold on.

John Clifford King versus Renee Amos and The Hartford Insurance Company, docket number 23-2124. I have called, sort of, this this quickie hearing to address a couple of matters. This case was the trial in this matter came before this court back on what date madame clerk?

CLERK:

14th. November 14th,

THE COURT:

November 14th? On November 14th trial was had in this matter.

Immediately thereafter, a hearing on contempt was had with regard to Mr. King and having said all that and having the history in place, let's go ahead and have appearances from counsel and then we'll discuss the matter. I believe we have new

counsel on board for

MR. BAUMAN:

That's correct Your Honor. Ed Bauman and I will be enrolling on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

Okay. I believe I signed, uh, a motion with the other lady

MR. BAUMAN:

Yes. You did Your Honor.

THE COURT:

I can't remember her name slips I just

MR. BAUMAN:

Kamie

THE COURT:

Kamie. Miss Kamie. Uh, she withdrew and you're enrolled, correct?

MR. BAUMAN:

Correct.

THE COURT:

Okay. Good deal. All right, go ahead Mr. Oliver. Make your appearance.

MR. SCHRUMPF:

I'm Oliver Schrumpf and as you know, I represent John King in the matter which is on appeal now and this Court has no jurisdiction to do anything on that case.

THE COURT:

Uh, well, we'll talk about that, all right?

MR. SCHRUMPF:

Okay.

THE COURT:

I I tend to tend to agree with you initially that, uh, appeal gets filed and we send it all up to the Third Circuit and we let them take care of

things, but I want to clarify something

real real quick. On

at trial, uh, and

before trial, I made it very clear to your

client Mr.

there King that

had been a

letters,

history

filings, of multiple

phone calls, contact, various things, with

the judge's

judge's office. He, uh, ultimately

retained you and I cautioned him then as

as as yourself that

he has counsel

well

and is represented, all pleadings are

to

be filed through you, okay? That's why we have lawyers in the case. I also will note for the record that at at the trial of this matter, We had the trial, and then immediately subsequent to trial, we held

our rule with for contempt regard to various behaviors of Mr. King. The

unfortunately, you advised the court that you were not retained to represent him with regard to the contempt matter and you existed the courtroom sir.

MR. SCHRUMPF:

Absolutely.

THE COURT:

Uh, and since that time, Mr.

King's efforts at filing things with this court have continued okay? As you well are aware and you've been copied on this and opposing counsel was not copied on these filings and

pleadings that were,

believe, made on December 12th, okay? And the reason I'm taking this rather unusual action of having us here today to talk about the matter is that, uh, on December 12th Mr. King filed various motions with the court which I believe you have copies of. Am I correct counsel?

MR. SCHRUMPF:

I was copied on the email.

THE COURT:

Okay. And, uh, we all agree that opposing counsel, Miss Kamie at the time, was not copied.

MR. SCHRUMPF:

I don't know.

THE COURT:

Well, if you look at his emails, she wasn't, okay? You were. I was

and madame clerk was but opposing counsel was not copied. Once again, this leads to more confusion about all parties not being properly advised as to what's going on in the matter. Specifically, he filed motions entitled Recuse to / Emergency Motion Remove Honorable Judge Ron Richard; Motion to Vacate Retaliatory Judgments; Motion to Strike and Seal Identifying Information from Public Record; Motion to Intervene to Prevent Harassment further Judicial and

Loss of Life. Once again, in those motions making substantially the very similar statements that led to the contempt rule in the first place. Now, I will admit Mr. Schrumpf, you caught me off guard when you

said, T

don't represent this gentleman with regard to contempt and you walked out the courtroom. There was so much going on that day due to the behavior of your client and quite frankly, his wife, that it caught me off guard. In hindsight, I would have instructed you to remain in the courtroom and advised you that you signed on to represent the guy

and
if
you
represent him, you can't just bifurcate
on his actions with
the representation
regard
to the
court
and
I
would have
required that you stay for the matter of
the rule
for contempt, okay? Now
since

this filing of December 12th that he has

and confusion the glaring made,

created by a lawyer saying,

chaos

I represent

the guy but not in everything in this case,

has become more apparent, okay? And so I

am instructing you now that you represent

him in this docket number, okay? And I am

going to set everything he

2

2

22

23

going to set

24

25

filed. I'm

set for hearing and I'm gonna

give notice to everyone in this courtroom

of that hearing date and we're gonna come

back and have a hearing on it. The reason I'm not having a hearing on these things today because I think we had to get out of the way who's first, who. Okay, who's driving the And ship? you're either driving that ship or you're or you're not driving that ship. isn't a This family matter where one takes lawyer over property

settlement issues that come after custody and child support and all those sorts of things. This is the matter and in the very matter, he is continuing his behavior that is causing much chaos and confusion with the actual legal process. All right? I am

setting the matter for January 15th at a.m. You can have your client here or not. I prefer that all parties be here.

All parties are entitled here. to be I am instructing everyone to have their clients here, all right? But, we're gonna have hearing on these matters that day.

MR. SCHRUMPF:

What

THE COURT:

now I want to

MR. SCHRUMPF:

what is being said

THE COURT:

hold on one second.

MR. SCHRUMPF:

Okay.

THE COURT:

One of the reasons why I'm having to take this extraordinary action is that in Mr. King's motion that he filed himself without you, his lawyer, he makes

again statements allegedly accusing this court and its staff of improper behavior. In fact, on January, I believe it was 12th, uh, I mean I'm sorry, December I'm to next month. I'm just already jumping to hoping. On December 12th, uh, when these motions were filed, were filed, Mrs. King had either that day immediately before, OF called this courthouse, got Miss Kay Bang on the phone who is the paralegal that basically

runs upstairs for us and advised her that

my behavior and her behavior

had led to

the murder of a man in Iowa, Louisiana on

December 11th and that there were, uh,

quote/unquote, white man went her in-laws house looking for her due to me, uh, this court putting this case on PACER. Let the record reflect PACER is a federal court record retention filing service. Nothing from Lake Charles City Court would be available on PACER, whatsoever and that this gentleman was shot six (6) times and

killed in Iowa and that me and Miss Kay Bang are responsible for that. And then on top of it, that it was such a big deal, three (3) police helicopters were circling that part of Calcasieu Parish to locate the man. I'm Okay? giving you some background as to why we gonna get who's who running the ship on each side here.

All right? I will just note for the record that I have verified, verified, and my staff has law enforcement through Calcasieu Parish, that there were indeed no murders in Iowa, Louisiana on December 11th or according to one of the chiefs at the Sheriff's Department, no murders in Iowa at all this year. All right? And the closest police helicopter to be used in

in Louisiana with relations to

to Lake Charles would be Baton Rouge and I don't believe we have three (3) of them. Okay?

It's kind that of behavior that is necessitating me having a hearing on these issues but having me do what I'm doing today which is to say,

we're having the hearing and you're they're lawyer. You're his lawyer. Okay? That's the order of the

court. Now, in another matter, another issue, as you're aware, there is currently a rule of contempt that has been filed for this, noticed by this court with regard to Mr. King's wife, Mrs. Shunte King and, uh, service with regard to that rule, uh, this being due to her calling illegally calling 9-1-1 in the middle of the trial and having EMTs show up in this courtroom concerned that someone was having they had been told that someone was having a

seizure in the courtroom which was all a complete lie and a complete fabrication and untruth. The addresses provided by your client, both on Louisiana Avenue, Simmons Street, and the Iowa address have

all come back as, she does not live there, neither does he, although that's the information provided. Now, Mrs. King made certain assertions, uh, both in various writings, phone calls and on the stand in the trial wherein you were counsel, that there is some some very important reason as to why she is in witness

her

protection or something of that nature and her personal information should not be provided to the public or put in a public record due to, uh, some bad people wanting to get her and, uh, our understanding is that is what she alleged happened December 11th. That we released her whereabouts, or her contact

this bad man

information, and these

showed up at her in-laws house in Iowa,

of

death resulted, all

We have established is completely

Louisiana and

a

which

not true.

So what we

have here is your

client filing things with the court; his

wife calling the court making statements;

this court unable to serve her with regard

to that because the addresses they have

provided locally are indeed not valid. So, I am ordering you, and you may do this under seal and no will one See this. H want to be very clear. It will be placed in the record under seal. I am ordering you to provide the address of Mr. King at his home in New Jersey. This court, I will tell you right now, intends to have her served through Long Arm Statute.

MR. SCHRUMPF:

I'm

Say sorry. that again please.

THE COURT:

This court intends to have her served through Long Arm service. Okay? I'm ordering you to provide that today before you leave the courtroom.

MR. SCHRUMPF:

If I have it.

THE COURT:

You have an address for him.

You have received payment from him.

You

23

24

have it. This court is

court is done with people

playing coy with the rules and with the

25

law. This is the way it works. People get

a lawyer or they don't get a lawyer. They come to court. They state their case. If they win, they win. If they don't like it, they appeal. This is how it works but the kind of behavior that has been exhibited here will not be allowed and this court and it's staff being being accused of being involved in a murder will not be allowed.

Period. Now, having said my peace and what I have ordered to be done, the court can hear you.

MR. SCHRUMPF:

The court will what?

THE COURT:

Will hear you.

MR. SCHRUMPF:

Judge, I did not prepare the motions that were filed by Mr. King. I did not

THE COURT:

I agree with you.

MR. SCHRUMPE:

get counsel from it. I didn't know it was gonna be filed.

THE COURT:

I believe you.

MR. SCHRUMPF:

And I I have nothing to do with those motions.

THE COURT:

I believe you.

MR. SCHRUMPF:

Okay.

THE COURT:

One hundred percent (100%). I

do not think that you have been involved

in any of this behavior. I think you have

the reality of a a client who is probably

not listening to what I believe would probably be your very good advice. I .

I

you are very well respected by me.

I have always believed you to be an upright and intelligent and very capable attorney, uh, and I simply am going to require that, since you're the attorney on this case, you're the attorney for everything on this case with regard to Mr. King, okay? Now, so, my order is that's when the hearing on all of these things he filed, unless he

withdraws them before that date, okay?

That's I that guess resolves that matter.

MR. SCHRUMPF:

Unless what?

THE COURT:

he Unless withdraws them before that date, we're gonna have a hearing on those matters on that date, okay? I am ordering that you provide his

home address. It will be placed under seal. Mr. Bauman, we've sort of ignored you. My apologies.

My apologies. Do you have anything you wish

MR. BAUMAN:

quite all right, Your Honor.

THE COURT:

to say?

MR. BAUMAN:

Just absorbing it all in.

THE COURT:

Now, Okay. having said all that, We do have one other matter that needs to be addressed. I granted, back on

August 13th of this year, I had granted pauper I granted pauper status to Mr. King. Now, this came after he had made multiple attempts at achieving pauper status and I had denied them each time simply because there was no affidavit attached, there or whatever. Things weren't filed in the record. Anyhow, it was just procedural stuff and

quite

frankly, I wasn't denying it based on any of the information he placed in it, it just wasn't procedurally

correct SO We would deny it, send it back and say hey you need, one two three, or whatever it was.

In August, I received his pauper status request and, uh, and it looked procedurally right so I signed off on it and I

granted
status. pauper
Okay?

Subsequent to that, he hired counsel and in fact, in one of his hearings subsequent to me granting pauper status, he advised that he spent twelve thousand dollars ($12,000.00) on lawyers in this past year, okay? Information which he did not place in the pauper affidavit and which would

have been a

information a very relevant piece of

to me in granting pauper

status because if you've got twelve (12)

grand to hire lawyers, then you can pay

the court costs in City Court. Having

recalled that and after he made that

statement, I actually went back and took a look at the pauper status, uh, pauper request and I noticed something else that, uh, I am rather embarrassed that I missed, but I just don't know if I didn't remember the wife's name or whatever, or if I really knew, but, uh, and I'll provide this for everyone in the courtroom to look at. But, as you well know, any pauper affidavit must be accompanied by a third party affidavit by someone who knew he person, knows their situation and can say,

uh, I and know Lois she's, uh, hadn't worked in ten (10) years, and whatever. And I can say speak some truth to her assertion that she is a pauper. And of course, a third party would be, in my case, Mr. Bauman or you would be a third party to me. You're not married to me. You're

not my first cousin or you know, whatever, my dad or etcetera. However, in reviewing this, I realized that the third party affidavit was executed by Mr. King's wife, Shunte King. Okay? Now, uh, I did not realize at the time that was his wife, uh, and when everything's written in it's kind of open to some

cursive,

interpretation but going back and taking a good look at it, I realized, uh, that she

That did that.

would of course be improper and would make the affidavit null and void because it's not executed by a third party. It's executed by his wife. She's not a third party. Not only is she not a third party, she's such a close party

that Louisiana law would require that we couldn't even make her testify against him because of spousal privilege. The very nature of being a third party would mean no privilege there. So,

this Court will sua sponte rescind the order for pauper. It is not procedurally correct. It is not properly done. It is therefore not a legal filing and So the court is gonna order

that the pauper status be rescinded retroactive to the date of granting and the court would caution everyone to be mindful in any statements made in any, uh, future such motions, uh, because a statement of having twelve thousand dollars ($12,000.00) to spend on lawyers means you got a couple hundred dollars to spend on court costs. Anyhow, all right

MR. SCHRUMPF:

Judge, I ... I ... as the since I am their attorney, at this point I have to say that this Court has no jurisdiction to take the action you just ordered under Code of Civil Procedure Article 208a, there are certain things that the court can do

THE COURT:

uh huh

MR. SCHRUMPF:

after the appeal has been granted.

THE COURT:

Right.

MR. SCHRUMPF:

And that's not one of them.

THE COURT:

But you your problem here sir is that your client continues in the behavior. Your client can't keep invoking the jurisdiction of this court and then

claim that this court has no jurisdiction.

There has to be consequences for continuing to involve. So what I suggest is, shall I speak bluntly? Get a grip on your client and tell him to stop. Okay? Because as long as he's gonna file things here, this court's gonna have jurisdiction. Okay? You don't get to say, oh, I'm appealing it and therefore I can just do and say whatever I want to this court. I make whatever allegations, assertions I want regarding this court. I

can in file things the record. I can continue to obey court orders and if you think that the Code of Civil Procedure in any way, shape OF form allows for this kind of behavior and then you get to hide behind, I filed an appeal, I beg to differ.

Okay. That is not what it meant. I'm not able to make

rulings generally. any

I

go back and redo

and redo things. I can't

can't go back

undo things. I can't

there's all sorts

of things I shouldn't be able to do except

he keeps addressing the court and filing

pleadings and his wife continues with her

contemptuous behavior. Okay? And SO,

I

don't like doing this. I don't know what

the right thing is to truly do but I know

that this behavior's gonna stop one way or

the other, period. We're

period. We're not gonna have

this. Anything Mr. Bauman?

MR. BAUMAN:

No Your Honor.

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THE COURT:

17

All right. Mr. Schrumpf

MR. SCHRUMPF:

I will see

THE COURT:

Do we have an envelope Miss

Somebody get me an envelope. He's

Bang?

gonna put the

in address

the envelope.

It's gonna be sealed and tendered to the

court. This

information

will not be

revealed to anyone other than immediate court staff or, uh, or deputy marshals who are involved in the Long Arm Service process regarding Miss King.

MR. BAUMAN: Your Honor, I'm filing motion to enroll with the Third Circuit regarding the appeal.

THE COURT: Yes sir.

MR. SCHRUMPF:

And

and Judge, there's no jurisdiction to sign any kind of order.

And, I I went through this in Allen Parish trying to enroll in a case where someone had taken an appeal and it was denied. I couldn't even enroll in because that's not one of the things allowed.

THE COURT:

He's

he's

enrolling in

the Third Circuit I believe he just said.

MR. BAUMAN:

Yea.

THE COURT:

He's not enrolling here.

MR. SCHRUMPF:

Oh okay. In the Third Circuit?

THE COURT:

Yea. Once again, uh, your clients have made this difficult situation putting me, you and all parties in a difficult mess. And I'm stuck with trying to find

way to handle this behavior.

Give that to Mr. Schrumpf please so he may

and give him a, uh, he's got a note

pad if he can just tear a piece of paper,

write the address, put it in it. It'll be

returned to me and sealed per my order.

Mr. Pete,

if you will provide me

that,

then I'll seal it.

MR. SCHRUMPF:

Judge, you should

look at

this right now before I leave. That's the address I have in my file.

THE COURT:

This Okay.

address

incorrect address that ...

is

an

Frank

MR. SCHRUMPF:

well, that's what you're telling me. That they're not you said you tried serving them and they can't be served there. As far as I know

THE COURT:

Let me be very clear

MR. SCHRUMPF:

he lives in New Jersey.

THE COURT:

Let me

let me be very clear. I haven't tried to serve anybody. The Marshal's in Office, doing their lawful duties, has made service, attempted service at three (3) addresses provided by your client. Okay? None of those addresses are where your client actually resides, okay? Your client testified in court that he resided in New Jersey.

MR. SCHRUMPF:

Yes sir.

THE COURT:

His wife testified to that as well, all right? I, due to her statements that she was in witness protection, I did

not

information require that she provide any

on the record, okay?

okay? So, I want to make very sure very clear here,

you as an officer of the court are telling me that you do not know or have an address where they live in New Jersey?

MR. SCHRUMPF:

do.

not

have their

New

Jersey address, correct.

THE COURT:

is Okay. All you have

this

one?

MR. SCHRUMPF:

This is his address

in my

file but I used

all

communications

have been by the email address

address which

I

provided to

THE COURT:

well that's how they're

that's how they're cooperating with this court. I'm just unaware of any way to do service via email, okay? This is being placed into

into the record.

It's not being sealed because it's the address

that's already in the record. I'll see you on the

15th Mr. Schrumpf.

MR. SCHRUMPF:

Okay.

MR. BAUMAN:

Thank you, Your Honor.

THE COURT:

Thank you gentlemen. Court's adjourned.

END OF HEARING

* * *

STATE OF LOUISIANA

PARISH OF CALCASIEU :

REPORTER'S PAGE

I, **Karey** J. **Bang, Certified Digital Reporter (1072019)** for the Lake Charles City Court in and for State of Louisiana, do hereby state on the Record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) and/or ellipsis (...) have been used to indicate pauses, changes in thought, and/or talk-overs; that same is the proper method for a Court Reporter's transcription of proceeding, and that the dashes (--) and/or ellipsis (...) do

not indicate that words or phrases have been left out of this transcript.

Lake Charles, Louisiana; January 7, 2025.



Кразо вану

KAREY BANG

Certified Digital Reporter

STATE OF LOUISIANA

PARISH OF CALCASIEU

REPORTER'S CERTIFICATE

I, Karey J. Bang, Certified Digital Reporter (1072019) for the Lake Charles City Court in and for State of Louisiana, do hereby certify that this testimony was reported to Shelia Hasty in the digital reporting method, was prepared and transcribed by me or under my direction and supervision, and is a true and

correct transcript to the best of my ability and understanding; that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board, or by the Supreme Court of Louisiana, and that I am not related to counsel or to the parties herein, nor am I otherwise interested in the outcome of this matter.

Lake Charles, Louisiana; January 7, 2025.

KAREY J. Bang

Certified igital Reporter

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Submitted by: Mrs Shunte King
Mailing Address for Confidentiality
123 North Louisiana, Lake Charles, LA 70601

Contact: fit4thekings@gmail.com
Case # 24-5634 Warrant # 26-13913
02/23/2026

MOTION TO QUASH WARRANT
14TH JUDICIAL DISTRICT COURT
CASE NO 24 5624

MOTION TO QUASH BILL OF INFORMATION, MOTION FOR FRANKS HEARING, MOTION TO RECUSE JUDGE FAZZIO, MOTION FOR CHANGE OF VENUE AND APPOINTMENT OF JUDGE AD HOC, MOTION TO REFER MATTER TO LOUISIANA ATTORNEY GENERAL

** I write this correspondence in fear for my life and safety, because of previous inability for those involved with Ron Richard to respect my crime victims status- as a result I will be using extended relatives addresses to receive correspondence**

NOW INTO COURT appears Defendant in fear of her life and safety, and the life of safety of loved ones following repeated threats to life and safety of Defendant, defendants child (ren), following an unwarranted break in resulting in homicide December 2024, appearing under duress harassment and threats by numerous Calcasieu Parish judges and officials to suppress evidence of theft, fraud, threats of suicide of children, dismissal of crime victims protections stalking by Calcasieu parish magistrate with imaginary crimes after contacting employers, law schools, graduate schools, bomb threats to NY & NJ employers, threats to various graduate and law schools in New Jersey, specially and without waiving jurisdictional objections and moves to quash the arrest warrant issued under the name Lanicia Shunte Jones.

I. Lack of Particularity Under Fourth Amendment

The Fourth Amendment requires particularized probable cause tied to a specific identifiable individual.

The warrant was issued under the name Lanicia Shunte Jones.

However the transcript record of November 14 2024 reflects identification as Shunte King.

No government issued identification was taken in open court.

No sworn domicile confirmation was made.

No independent verification of identity was established prior to criminal referral.

An impersonation investigation Case No 24 118583 was pending at the time.

When identity is inconsistent or unverified, probable cause lacks constitutional particularity.

II. Defective Address and Service

Service records reflect Iowa Louisiana address not associated with Defendant's domicile.

Under Louisiana service law, process must be directed to actual domicile or personally served.

Criminal process built upon defective identity and address information violates constitutional safeguards.

III. Relief Requested

Defendant requests that the arrest warrant be quashed, that any associated entry be removed, and that the prosecution be dismissed for lack of particularized probable cause.

MOTION TO QUASH BILL OF INFORMATION

NOW INTO COURT appears Defendant and moves to quash the Bill of Information pursuant to Louisiana Code of Criminal Procedure Article 532.

I. Defect in Institution of Prosecution

The charging instrument reflects identity inconsistent with the civil record.

No verified identification preceded referral.

Service documentation reflects incorrect domicile.

II. Due Process Defect

Due process requires notice and certainty in charging instrument.

Where identity is materially uncertain the prosecution is constitutionally infirm.

III. Relief Requested

Dismissal of the Bill of Information.

MOTION FOR FRANKS HEARING

Defendant moves for evidentiary hearing pursuant to Franks v Delaware.

Material omissions in affidavit include:

Failure to disclose lack of identity verification

Failure to disclose identity discrepancy in transcript.

Failure to disclose pending impersonation investigation.
Failure to disclose medical emergency context.

If corrected, probable cause would not exist.

Defendant requests production of the affidavit and evidentiary hearing.

MOTION TO RECUSE JUDGE FAZZIO

Pursuant to Louisiana Code of Criminal Procedure Article 671.

The validity of the warrant and referral is challenged.

The Court would be required to review its own probable cause determination.

Interconnected matters within Calcasieu Parish create objective appearance concerns.

Defendant requests recusal and reassignment.

MOTION FOR CHANGE OF VENUE AND APPOINTMENT OF JUDGE AD HOC

Pursuant to Louisiana Code of Criminal Procedure Article 621.

Due to interconnected civil litigation, documented threats, financial coercion, ex parte evidence, and institutional entanglement, Calcasieu Parish is no longer a neutral forum.

Defendant requests transfer outside the 14th Judicial District or appointment of judge ad hoc.

MOTION TO REFER MATTER TO LOUISIANA ATTORNEY GENERAL

Pursuant to Louisiana Constitution Article IV Section 8.

Due to extensive overlap between civil disputes and criminal referral, independent review is warranted.

Defendant requests referral to Louisiana Attorney General for review of probable cause and prosecutorial integrity.

NUMBERED CONSTITUTIONAL AND STATUTORY VIOLATIONS

This pleading and or filing requests court review of judicial conduct in connection with the following proceedings:

Louisiana – Lake Charles City Court
- Case No. 23-2124 – King v. Amos
- Case No. 23-1206 – King v. Colston

Louisiana – 14th Judicial District Court
- Case No. 24-5624
- Case No. 2021-2773
- Case No. 24-118583
- Case No. 2021-00123665

Louisiana – Third Circuit Court of Appeal
- CA-25-0049 – John Clifford King v. Renee Amos and Hartford Fire Insurance Company

Federal – Western District of Louisiana
- Case No. 25-cv-1759

New Jersey – Essex County
- FV-07-000817-22
- C21039526

LACK OF PERSONAL JURISDICTION AND SERVICE DEFECT

Violation 1
La. C.C.P. art. 1201 – Citation and Service Required
Violation 2
La. C.C.P. art. 225 – Constructive Contempt Requires Written Rule and Service
Violation 3
Fourteenth Amendment – Procedural Due Process

Facts:

- No written Rule to Show Cause was personally served upon me prior to November 14, 2024.
- No verified identification was taken in open court.

• Service was attempted at an Iowa, Louisiana address not associated with my domicile.
• December 30, 2024 correspondence reflects the Court did not possess confirmed address information.

Legal Concern:

A court cannot exercise personal jurisdiction absent valid service.
Any contempt adjudication without service is voidable under La. C.C.P. art. 2002(2).

SECTION II
NOTICE DEFICIENCY AND SHIFTING CONTEMPT GROUNDS

Violation 4
La. C.C.P. art. 225 – Specificity Requirement
Violation 5
Fourteenth Amendment – Notice and Opportunity to Defend
Violation 6
In re Oliver, 333 U.S. 257

Facts:

• Verbal allegation of "practicing law"- please refer to collusion with Orelia Lawdins - Trent and Lakoshia Roberts attached emails attacking Shunte King in New Jersey graduate schools, then refer to Orelia Lawdins on the cost sheet she is the lawyer for Charmaine Y Colston review case # 23-2124 cost sheet and refer to witness testimony of Lawdins- Trent payment to Kamie Dominic and attendance at 23-2124 hearings yet wasn't allowed to be served.

Ron richard through ex - parte communication imposed a false criminal charge across state lines on Shunte King and his, Lakoshia Roberts, and Magistrate Orelia Lawdins- Trent obsession with Shunte King.

In addition to the former ADA Ross Murray audio Recordings threatening the charges that Ron Richard imposed on Shunte King who was currently assistant ada and present coworker of Lakoshia Roberts (fraudulent counsel for John King , SKings husband)

• Later reference to "communication with intent to cause emergency response"
• Criminal referral under 14th JDC Case No. 24-5624

Concern:

Contempt cannot be imposed on shifting or unspecified grounds without amended written notice and service.

DENIAL OF COUNSEL IN CONTEMPT CONTEXT

Violation 7
Sixth Amendment – Right to Counsel
Violation 8
Louisiana Constitution Art. I §13
Violation 9
La. C.C.P. art. 225

Facts:

• Counsel formally disclaimed representation for contempt matters
• No separate appointment or opportunity to secure counsel
• Contempt proceeding carried punitive exposure

Concern:

Punitive contempt requires procedural safeguards equivalent to criminal protections.

IDENTITY AND WARRANT IRREGULARITIES
(14th JDC Case No. 24-5624)

Violation 10
Fourth Amendment – Particularity Requirement
Violation 11
La. C.Cr.P. art. 202 – Probable Cause for Warrant
Violation 12
Fourteenth Amendment – Due Process

Facts:

• Civil proceedings reflect name "Shunte King"
• Criminal charge entered under "Lanicia Shunte Jones"
• No identification verified in court
• Address irregularity involving Iowa, Louisiana
• Impersonation investigation under Case No. 24-118583

Concern:

Warrant issuance requires particular identification of the person to be seized.

SECTION V
FEE ESCALATION AND TRANSCRIPT COST IMPOSITION
(23-2124; December 30, 2024)

Violation 13
La. C.C.P. art. 1920 – Costs Must Be Equitable
Violation 14
La. C.C.P. art. 2088 – Divestiture of Jurisdiction
Violation 15
Fourteenth Amendment – Access to Courts Doctrine

Facts:

• Approximately $5,000 in costs imposed December 30, 2024
• $800 transcript cost
• Prior minimal handwritten minute sheets
• Costs assessed against individual disputing service

Concern:

Transcript fees may not be used as artificial barriers to appellate review.

SECTION VI
POST-APPEAL JURISDICTIONAL REVIEW

Appeal signed December 4, 2024.
Under La. C.C.P. art. 2088, trial court jurisdiction is limited post-appeal.

United States Department of Justice review requested for any post-divestiture actions.

SECTION VII
RELATED PROCEEDINGS REQUIRING RECORD REVIEW

This complaint specifically requests the court obtain full records from:

Lake Charles City Court
23-2124
23-1206

14th Judicial District Court
24-5624
2021-2773
24-118583
2021-00123665

Third Circuit Court of Appeal
CA-25-0049

Western District of Louisiana
25-cv-1759

Essex County, New Jersey
FV-07-000817-22
C21039526

2021
• Calcasieu Parish Case 2021-2773 initiated
• Vehicle investigation Case 2021-00123665

2022
• Essex County FV-07-000817-22
• Amended TRO filings

2023
• Lake Charles City Court 23-1206
• Lake Charles City Court 23-2124

November 13–14, 2024
• Civil trial proceedings
• Verbal contempt references
• No documented personal service

November 15–19, 2024
• Rule to show cause references
• Cost entries reflect “Shunte King” at Iowa address

November 21, 2024
• Judgment signed

December 4, 2024
• Appeal signed \ CA-25-0049
• Divestiture under La. C.C.P. art. 2088

December 11, 2024
• Emergency recusal motion filed

December 30, 2024
• $5,000 cost imposition
• Transcript charges
• Address request in open court

2025
• Federal filing 25-cv-1759

2026
• Criminal Case 24-5624 warrant issue

The concerns presented fall into the following categories:

1. Exercise of jurisdiction without verified service
2. Constructive contempt without written notice or proper service
3. Identity and address irregularities in connection with contempt and warrant proceedings
4. Criminal referral under Case No. 24-5624 raising probable cause and identification concerns
5. Escalated and potentially inequitable cost imposition totaling approximately $5,000 on December 30, 2024
6. Transcript fee assessments that may have impaired appellate access
7. Post-appeal jurisdictional limitations under La. C.C.P. art. 2088
8. Overlapping involvement in matters connected to Calcasieu Parish Case No. 2021-2773
9. Request for court and district attorney to review of communications involving Lake Charles College Prep leadership during 2021–2022

Lake Charles City Court
• Case No. 23-2124 – King v. Amos
• Case No. 23-1206 – King v. Colston

14th Judicial District Court – Calcasieu Parish
• Case No. 24-5624 (criminal charge and warrant)
• Case No. 2021-2773

• Case No. 24-118583 (impersonation investigation)
• Case No. 2021-00123665 (vehicle investigation)

Third Circuit Court of Appeal
• CA-25-0049

Western District of Louisiana
• Case No. 25-cv-1759

Essex County, New Jersey
• FV-07-000817-22
• C21039526

This complaint does not request that the court adopt factual conclusions.
It respectfully requests independent review of transcripts, service records, cost ledgers, and related communications.

PRIMARY AREAS OF CONCERN

1. Personal Jurisdiction and Service Irregularities

• No written Rule to Show Cause was personally served upon me prior to November 14, 2024.
• No identification was verified in open court.
• Service was attempted at an Iowa, Louisiana address not associated with my residence.
• December 30, 2024 court correspondence reflects uncertainty regarding my address.

Relevant Law:
La. C.C.P. art. 1201; art. 225; Fourteenth Amendment due process.

Investigative Request:
Review service returns and transcript record to determine whether personal jurisdiction properly attached before contempt proceedings were pursued.

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2. Constructive Contempt Procedure and Notice Deficiency

• Verbal allegation of "practicing law" during proceedings.
• Later references to "communication with intent to cause emergency response."
• Criminal referral under 14th JDC Case No. 24-5624 followed.
• No amended written rule served reflecting change in alleged conduct.

Relevant Law:
La. C.C.P. art. 225; In re Oliver, 333 U.S. 257; Fourteenth Amendment.

Investigative Request:
Review transcripts dated November 14, 15, and 19, 2024 to determine whether proper written notice and opportunity to defend were provided.

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3. Criminal Referral and Warrant Concerns
(14th JDC Case No. 24-5624; Warrant Issued February 6, 2026)

• Civil proceedings reference "Shunte King."
• Criminal matter references "Lanicia Shunte Jones."
• No identification documented in open court.
• Address inconsistencies present in civil cost records.
• Impersonation investigation (Case No. 24-118583) overlapped in time.

Relevant Law:
Fourth Amendment – Particularity Requirement
La. C.Cr.P. art. 202 – Probable Cause
Fourteenth Amendment – Due Process

Investigative Request:
Obtain warrant affidavit and supporting documentation to determine how identity and probable cause were established.

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4. Fee Escalation and Transcript Cost Assessment
(23-2124; December 30, 2024)

• Approximately $5,000 assessed December 30, 2024.
• $800 transcript fee imposed.
• Earlier hearings reflected minimal handwritten minute entries.
• Costs assessed against an individual disputing service.

Relevant Law:
La. C.C.P. art. 1920 – Costs must be equitable
La. C.C.P. art. 2088 – Divestiture upon appeal
Constitutional access to courts doctrine

Investigative Request:
Review cost ledger and transcript billing practices to determine whether fee imposition was equitable and consistent with appellate access protections.

COST DISCREPANCY ANALYSIS
Lake Charles City Court

I. CASE NO. 23-2124 – KING v. AMOS

A. Early 2024 Cost Pattern (Baseline)

On February 23, 2024, in Case No. 23-2124 (King v. Amos), the record reflects:

"Request for certified copies received by Charmaine Colston.
Cost for certified copy of petition (6 pages) and court minute sheet (1 page):
$23.00 + $6.00 = $29.00."

This entry demonstrates:

• Standardized pricing
• Transparent per-page calculation
• Routine administrative cost structure

Earlier 2024 proceedings in 23-2124 reflect:

• Single-page handwritten minute sheets
• Routine filing fees
• No extraordinary billing events

This establishes a clear baseline pattern of ordinary court costs.

B. November 14 and December 30, 2024 Escalation

In sharp contrast, the cost ledger for 23-2124 reflects:

• Approximately $5,000.00 imposed December 30, 2024
• $800.00 assessed for transcript preparation
• Additional service and administrative entries

This represents a dramatic and sudden escalation from the routine $29 certified copy charge earlier in the same case.

C. Disparity Within the Same Case

The discrepancy is not between different cases — it exists within Case No. 23-2124 itself.

Comparison inside 23-2124:

February 23, 2024
• $29 total for certified petition and minute sheet

November 14 – December 30, 2024
• ~$5,000 total assessed in one day
• $800 transcript fee
• Multiple administrative entries

This internal contrast highlights:

• A shift from routine administrative billing
• To concentrated, high-value cost imposition late in the litigation

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D. Transcript Fee Discrepancy

Earlier hearings in 23-2124 are reflected by:

• Minimal handwritten minute entries
• No multi-volume transcript references

Yet November 14 proceedings resulted in:

• $800 transcript cost

If the record volume was comparable to earlier hearings, this magnitude of transcript charge requires explanation.

E. Service Charges at Disputed Address

The cost ledger reflects:

• Charges for service at an Iowa, Louisiana address
• Entries under “Shunte King”
• No confirmed domicile at that location

If service was not legally perfected, assessment of service costs against a disputed address raises concerns under:

La. C.C.P. art. 1920 – costs must be equitable.

F.Post-Divestiture Timing

Appeal order signed December 4, 2024.

Under La. C.C.P. art. 2088:

Upon appeal, jurisdiction transfers to the appellate court except for limited matters.

The largest cost concentration occurred December 30, 2024, after divestiture.

If transcript fees were imposed as a precondition to appellate review after appeal was signed, that raises jurisdictional and access-to-courts concerns.

II. COMPARISON WITH CASE NO. 23-1206 – KING v. COLSTON

Case No. 23-1206 reflects:

• Routine small-claims-level fees
• Standard service charges
• No comparable $5,000 single-day spike
• No comparable transcript escalation

The absence of a similar escalation in 23-1206 highlights the magnitude of the December 30, 2024 cost concentration in 23-2124.

III. SUMMARY OF GLARING DISCREPANCIES

1. Internal escalation within the same case (23-2124)
2. $29 routine certified copy vs. ~$5,000 single-day assessment
3. $800 transcript charge following minimal minute entries
4. Service fees tied to disputed Iowa address

5. Cost imposition after appeal signed December 4, 2024

COST DISCREPANCY ANALYSIS
Lake Charles City Court

Category	***Case No. 23-2124 King v. Amos***	***Case No. 23-1206 King v. Colston***
Early 2024 Baseline Costs	*February 23, 2024 certified copy request: $29.00 [1]*	*Routine filing and service fees only; no comparable escalation*
November 14 and December 30, 2024 Activity	*Approximately $5,000.00 imposed December 30, 2024 [2] $800.00 transcript charge [3]*	*No comparable single day cost spike*
Service and Address Entries	*Service fees entered at Iowa, Louisiana address under 'Shunte King' [4]*	*Standard service entries; no address irregularity reflected*

Footnotes:

[1] February 23, 2024 entry: Request for certified copies, total cost $29.00.

[2] Cost ledger reflects approximately $5,000.00 assessed December 30, 2024 in Case No. 23-2124.

[3] Transcript preparation fee of $800.00 reflected in cost bill.

[4] Service entries reflect Iowa, Louisiana address not associated with domicile, raising equity concerns under La. C.C.P. art. 1920.

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5. Post-Appeal Jurisdictional Boundaries

• Appeal order signed December 4, 2024 (CA-25-0049).
• Jurisdiction transfers to appellate court under La. C.C.P. art. 2088.

Post-Divestiture Timing

Appeal order signed December 4, 2024.

Under La. C.C.P. art. 2088:

Upon appeal, jurisdiction transfers to the appellate court except for limited matters.

The largest cost concentration occurred December 30, 2024, after divestiture.

If transcript fees were imposed as a precondition to appellate review after appeal was signed, that raises jurisdictional and access-to-courts concerns.

II. COMPARISON WITH CASE NO. 23-1206 – KING v. COLSTON

Case No. 23-1206 reflects:

• Routine small-claims-level fees
• Standard service charges

- *No comparable $5,000 single-day spike*
- *No comparable transcript escalation*

The absence of a similar escalation in 23-1206 highlights the magnitude of the December 30, 2024 cost concentration in 23-2124.

III. SUMMARY OF GLARING DISCREPANCIES

1. *Internal escalation within the same case (23-2124)*
2. *$29 routine certified copy vs. ~$5,000 single-day assessment*
3. *$800 transcript charge following minimal minute entries*
4. *Service fees tied to disputed Iowa address*
5. *Cost imposition after appeal signed December 4, 2024*

Judicial Investigative Request:
Review any actions taken after December 4, 2024 to determine whether jurisdictional limits were observed.

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6. Related Educational Institution Communications (2021–2022)

This complaint respectfully requests review of potential communications involving:

Lake Charles College Prep
Board of Directors
Administrative leadership during 2022

In connection with:

Calcasieu Parish Case No. 2021-2773
Lake Charles City Court Case Nos. 23-1206 and 23-2124

District Attorney Investigative Request:
Consider interviews of relevant former administrative personnel to determine whether external judicial involvement occurred during active litigation.

This request is made solely for independent review and fact verification.

III.Exhibits Included

EXHIBIT APPENDIX
Case No 24 5624
State of Louisiana v. Lanicia Shunte Jones

The following exhibits are incorporated by reference and attached in support of all motions filed contemporaneously herewith.

Exhibit A
Ross Murray ADA recordings alleging crimes and confirming judicial intervention regarding warrants of Charmaine Colston.

Exhibit B
Transcript reference to Derrick Kee in King v Colston in the courtroom of Judge Ron Richard referencing Ross Murray.

Exhibit C
December 30 2024 cost spike documentation and billing concentration in Case No 23 2124.

Exhibit D
Full transaction report comparison for Case No 23 2124.

Exhibit E
Handwritten minute sheet contrast from earlier hearing sessions.

Exhibit F
Judge Bice cost confirmation letter and related filing.

Exhibit G
Schrumpf email disclaiming representation of Mrs. King.

Exhibit H
Service discrepancy record entry reflecting Iowa Louisiana address.

Exhibit I
Impersonation investigation acknowledgment Case No 24 118583.

Exhibit J
Emails of attorneys threatened by Lake Charles City Court staff and deterred from enrolling.

Exhibit K
Transcripts of Judge Ron Richard threatening Attorney Oliver Schrumpf.

Exhibit L
Emails from Lake Charles City Court staff stating Judge Ron Richard was not happy and intimidating Attorney Dustan Abshire.

Exhibit M
Recordings and witness statements that Judge Ron Richard stated he did not want Renee Amos found guilty because she did not have a pot to piss in.

Exhibit N
Full Calcasieu Parish investigation records of auto theft, securities fraud, and life insurance fraud referenced in related proceedings.

Exhibit O
Record evidence that Calcasieu Parish officials misrepresented homicide details to appellate court.

Exhibit P
Calcasieu District Attorney office recordings and emails confirming concealment of crimes of notary public.

Exhibit Q
Emails of Magistrate Orelia Lawdins Trent and Lakoshia Roberts Esq conspiring to create criminal charges and contacting courts, hospitals, and schools in New Jersey alleging false crimes.

Exhibit R
Recordings of Magistrate Orelia Lawdins Trent communicating with Essex County NJ officials abusing position to threaten Mrs. King.

Exhibit S
Affidavits from former 14th JDC staff regarding internal interference.

Exhibit T
Affidavits from Lake Charles College Prep High School staff confirming Ron Richard board member activity interfering with custody orders in Case No 2021 2773.

Exhibit U
Evidence of ex parte communication between 14th JDC staff and Orelia Lawdins Trent.

Exhibit V
Evidence of ex parte communication between 14th JDC staff and Lakoshia Roberts.

Exhibit W
Evidence of Southwest Louisiana law office withholding subpoenaed documents.

Exhibit X
Evidence of conspiracy to deprive John King of right to legal representation.

Exhibit Y
Audio recordings of City Clerk Monica Abshire.

Exhibit Z
Audio recordings of Lake Charles City Court staff Kay Bang.

Exhibit AA
Testimony of former court staff attesting that Judge Richard requested Case No 23 2124 be transferred to him.

Exhibit AB
Evidence Calcasieu Parish Police suppressed impersonation investigation at request of Judge Richard.

Exhibit AC
Evidence of who retained Kamie Dominic and testimony of ex parte communication to impose sanctions in Case No 23 2124.

Exhibit AD
Audio recordings of Lake Charles Charter employees detailing harassment and threats to employment.

Exhibit AE
Medical records confirming stroke and paralysis of John King Sr.

Exhibit AF
Medical records confirming removal of spinal vertebrae.

Exhibit AG
Transcript evidence of seizure of John King Sr on courtroom floor November 14 2024 Case No 23 2124.

Exhibit AH
Federal filings against 14th JDC and subsequent warrant issuance after notice of federal investigation January 28 2026.

The accompanying complaint packet includes:

• November 14, 2024 transcript (pages 1–31)
• November 14, 2024 transcript (pages 32–72)
• Cost bills and transaction reports

- Notice of appeal and writ documentation
- Service records reflecting Iowa, Louisiana address
- Correspondence dated December 18–30, 2024
- Impersonation investigation references
- Criminal case documentation (24-5624)

I respectfully request that the Calcasieu District Attorney's Office

- Obtain full certified transcripts
- Review service returns and cost ledgers
- Review warrant affidavit in Case No. 24-5624
- Review any communications between court staff and counsel
- Review appellate rulings in CA-25-0049
- Determine whether judicial conduct complied with the Louisiana Code of Judicial Conduct

This submission is made in good faith and requests fair and ethical review.

PLEASE NOTE EXHIBIT ATTACHMENTS ARE ONGOING AND MORE WITNESSES ARE SUBMITTING AFFIDAVITS

STRUCTURED EVIDENTIARY MATRIX
Case No 24 5624
Mrs. John C. King Sr.

This matrix cross references constitutional claims to attached exhibits.

I. FOURTH AMENDMENT
Particularized Probable Cause and Identity Certainty

Legal Standard
A warrant must particularly describe the person to be seized.
U.S. Const. Amend IV
Franks v Delaware 438 U.S. 154

Elements

1. Accurate identification of accused
2. Verified identity prior to issuance
3. No material omissions in affidavit
4. Probable cause tied to specific identifiable person

Supporting Exhibits

Exhibit A
Ross Murray ADA recordings referencing intervention and warrant handling

Exhibit B
Transcript reference to Derrick Kee and identity record in open court

Exhibit I
Impersonation investigation Case No 24 118583 pending at time of charge

Exhibit H
Service discrepancy showing Iowa Louisiana address

Exhibit AG
Transcript evidence of November 14 2024 proceedings

Exhibit AB
Evidence impersonation investigation suppressed

How Exhibits Satisfy Claim

These exhibits demonstrate inconsistent identity, pending impersonation concerns, and lack of particularized verification before issuance of criminal process.

II. FOURTEENTH AMENDMENT
Procedural Due Process

Legal Standard
Notice, opportunity to be heard, valid jurisdiction, neutral adjudicator

Elements

1. Proper service
2. Clear notice of charge
3. Neutral tribunal
4. No arbitrary cost burdens

Supporting Exhibits

Exhibit H
Service discrepancy record

Exhibit D
Transaction report comparison

Exhibit C
December 30 2024 cost spike

Exhibit F
Judge Bice cost confirmation

Exhibit K
Transcript of Judge Ron Richard threatening counsel

Exhibit L
Emails intimidating enrolled counsel

Exhibit S
Affidavits from former 14th JDC staff

How Exhibits Satisfy Claim

These documents show service irregularities, disproportionate financial burdens, intimidation of counsel, and structural entanglement undermining neutrality.

III. SIXTH AMENDMENT
Right to Counsel and Fair Adjudication

Legal Standard
Criminally exposed individual must have meaningful access to counsel

Elements

1. No coercion deterring representation
2. No interference with counsel enrollment
3. No intimidation of defense attorneys

Supporting Exhibits

Exhibit J
Emails of attorneys deterred from enrolling

Exhibit K
Transcript threats toward Attorney Schrumpf

Exhibit L
Emails regarding dissatisfaction with defense counsel

Exhibit X
Evidence conspiracy to deprive right to legal representation

How Exhibits Satisfy Claim

Shows systemic deterrence and intimidation affecting access to counsel.

IV. ADA AND ACCESS TO COURTS
Reasonable Accommodation and Equal Access

Legal Standard
Title II ADA and Due Process require reasonable accommodation and meaningful access

Elements

1. Documented medical disability
2. Denial of accommodation
3. Forcing unsafe travel or physical exposure

Supporting Exhibits

Exhibit AE
Medical records confirming stroke and paralysis

Exhibit AF
Medical records confirming spinal vertebrae removal

Exhibit AG
Transcript evidence of medical emergency in courtroom

How Exhibits Satisfy Claim

Demonstrates medical vulnerability and potential failure to accommodate.

V. EX PARTE COMMUNICATION AND JUDICIAL ETHICS
Canon 2 and Canon 3 Violations

Legal Standard
Judges must avoid impropriety and appearance of impropriety

Elements

1. Ex parte communications
2. Preferential treatment
3. Retaliatory conduct

Supporting Exhibits

Exhibit U
Evidence of ex parte communications with Orelia Lawdins Trent

Exhibit V
Evidence of ex parte communications with Lakoshia Roberts

Exhibit AA
Testimony case reassignment to Judge Richard

Exhibit M
Recordings of statements regarding desired outcome for Renee Amos

Exhibit AC
Evidence of ex parte communication to impose sanctions

How Exhibits Satisfy Claim

Shows potential preferential treatment and improper communications outside presence of opposing party.

VI. RETALIATION AND STRUCTURAL ENTANGLEMENT
Fourteenth Amendment and First Amendment Implications

Legal Standard
Government may not retaliate for lawful filings or federal complaints

Elements

1. Protected activity
2. Adverse action
3. Temporal proximity

Supporting Exhibits

Exhibit AH
Federal filings and subsequent warrant issuance

Exhibit O
Appellate misrepresentations

Exhibit P
DA recordings regarding concealment

Exhibit Q
Emails conspiring to create criminal charges

How Exhibits Satisfy Claim

Shows temporal proximity between federal activity and criminal escalation.

VII. PROSECUTORIAL INTEGRITY AND INSTITUTIONAL CONFLICT

Legal Standard
Neutral charging authority and absence of institutional conflict

Elements

1. Independent prosecutorial review
2. No local entanglement
3. No suppression of material investigations

Supporting Exhibits

Exhibit A
Ross Murray recordings

Exhibit AB
Evidence impersonation investigation suppressed

Exhibit N
Full Calcasieu investigations

How Exhibits Satisfy Claim

Supports request for Attorney General review and external oversight.

Respectfully Submitted,

_____

Mrs. Shunte King

Pro Se / Non Specified Identity Characteristics Party

JAMIE B. BICE, JUDGE
RONALD C. RICHARD, JUDGE

OFFICE: 337-491-1305
FAX: 337-491-8676

CIVIL SECTION: 337-491-1564
CIVIL FAX: 337-491-1303

VIOLATION BUREAU: 337-491-1565
VIOLATION FAX: 337-491-8745

LAKE CHARLES CITY COURT
WARD 3 CALCASIEU PARISH

P.O. Box 1664/118 West Mill Street
Lake Charles, LA 70602-1664/70601-4217
www.lccitycourt.org

November 14, 2025

Mr. John Clifford King, Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601
Via CMRRR and email truekingfile@gmail.com

Re: Civil Action No. 23-2124; John Clifford King v Renee Amos

Dear Mr. King:

Our Clerk of Court has notified me of two fax filings you recently submitted in the above-referenced matter. Please be advised that those filings have been time-stamped but not filed into the record because once an appellate decision becomes final under La. C.C.P. art. 2166 and 2167 (as is the case in the above-referenced matter), the judgment acquires *res judicata* effect which bars further litigation of issues that have already been adjudicated. Simply stated, *res judicata* means that an issue that has been definitively settled by judicial decision. The essential elements of *res judicata* are (1) an earlier decision on the issue, (2) a final judgment on the merits, and (3) the involvement of the same parties, or parties in privity with the original parties. *Black's Law Dictionary,* 12th edition.

La. C.C.P. art. 2166 provides that "the judgment of a court of appeal becomes final and definitive if neither an application to the court of appeal for rehearing nor an application to the supreme court for a writ of certiorari is timely filed." La. C.C.P. art. 2166. Our records do not reflect that you filed an application for rehearing with the Third Circuit Court of Appeal following its judgment entered on May 21, 2025. Likewise, La. C.C.P. art. 2167 states that "a judgment of the supreme court becomes final and definitive when the delay for application for rehearing has expired and no timely application therefor has been made."

Additionally, La. R.S. Section 13:4231 codifies the *res judicata* doctrine, providing that "a valid and final judgment is conclusive between the same parties, except on appeal or other direct review." This means that once an appellate judgment becomes final and definitive, any subsequent proceedings in the trial court must be authorized by the remand instructions or must fall outside the scope of the issues already decided. As no such authorization exists here, and this matter has been closed at Lake Charles City Court, the two faxed documents you submitted are being **returned** to you. Finally, any future filings in a matter that has been fully adjudicated and after

all appeals have been exhausted may subject the filer to sanctions, including contempt of court. La. C.C.P. art. 224.

With regard to the cost bill sent to you on May 28, 2025 and again on July 10, 2025, please be aware that La. C.C.P. art. 5186 and 5188 establish that indigent parties (pauper status) who do not prevail on the merits of a case are still responsible to pay costs as cast. More specifically, La. C.C.P. art. 5186(c) states that when an indigent party loses, costs become due. Enclosed is an updated Cost Bill for your review. This updated Cost Bill reflects the Third Circuit ruling of May 21, 2025 and has been adjusted as a result. If you have any questions about the cost bill, please call Monica Abshire at 337-491-1564.

Sincerely,

Jamie B. Bice
Chief Judge, Lake Charles City Court

JBB/kb

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

November 17, 2025
UPDATED

TO: John Clifford J. King
123 N. Louisiana Ave
Lake Charles, LA 70601
Email: truekingfile@gmail.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5397.36 minus Credit $105.00 = New Balance of $5292.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)
Subject to Credit:	$105.00

Please remit payment to Lake Charles City Court for the amount listed above.
Credit cards are assessed an online transaction fee

If you have any questions about the named suit above, please call the Civil office at (337)491-1564.

Monica Abshire
Clerk of Court

FAX COVER SHEET

TO	Lake Charles City Fax
COMPANY	lake charles city court
FAX NUMBER	13374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 18:52:44
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is SUPPLEMENTAL FAX attached to earlier fax dated for today 11/13/2025

Notice of Lack of Jurisdiction and Divestiture Confirmation

Plaintiff submits this Notice to confirm that the Court was divested of jurisdiction on December 3 2024 upon the granting of a devolutive appeal pursuant to Louisiana Code of Civil Procedure article 2088. From that date forward the Court lacked authority to issue orders conduct hearings impose costs generate service attempts rescind pauper status or issue contempt citations. All actions taken after divestiture are void ab initio.

The Court nevertheless conducted hearings on December 18 and December 30 2024 generating additional costs service returns and contempt related entries. These actions were taken without authority and are null. Plaintiff submits this Notice to ensure that no post divestiture fees orders or actions are enforced now or in the future.

ELECTRONIC

FILE DATE: 11-13-2025

Emergency Notice of Prohibited Fee Enforcement

Plaintiff submits this Emergency Notice to preserve all rights before expiration of the statutory period and to document ongoing prohibited enforcement attempts. Plaintiff contacted the Clerk of Lake Charles City Court on this date to request removal of fees and costs that were entered after the Court was divested of jurisdiction on December 3 2024. The Clerk refused and stated that Judge Ronald C Richard is demanding that Plaintiff pay these fees.

All fees assessed after December 3 2024 are void under Louisiana Code of Civil Procedure article 2088. The Court lacked authority to issue orders hold hearings generate service returns or impose costs. Plaintiff has never provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and any fees based on those returns are fraudulent and unenforceable.

The Clerk refusal to remove void fees and the judge ongoing demand for payment constitute retaliation intimidation and abuse of authority. Plaintiff submits this Notice to ensure the record reflects that Plaintiff has objected to all post divestiture fees and that any attempt to enforce them now or in the future is unlawful and constitutes retaliation under state and federal law.

Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

ELECTRONIC

FILE DATE: 11-13-2025

Notice of Correction of False Addresses and Appellate Misrepresentations

Plaintiff submits this Notice to correct multiple inaccuracies and fabricated statements that appear in the record. Plaintiff has never lived in or provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and all fees assessed for service at that location were created without factual basis and must be removed immediately.

Additionally statements made by attorney Mr Bauman regarding the location of a homicide are false. The incident referenced in the appellate filings occurred in Houston Texas not Iowa Louisiana. The claim that Plaintiff spouse called helicopters is also false and unsupported. These misrepresentations distorted the appellate record and contributed to inflated court costs and retaliatory actions taken by the Court.

Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

ELECTRONIC

FILE DATE: 11-13-2025

Monica Abshire

From: Monica Abshire
Sent: Friday, November 14, 2025 7:36 AM
To: truekingfile@gmail.com
Subject: Emailing: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax
Attachments: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax.pdf

Please see attached the Affidavit of Transmission on Supplemental Fax to 11/13/2025 filings.

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King v Amos - Affidavit of Transmission - Supp. Fax

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Affidavit of Transmission

Attention: John C King Sr Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C King Sr vs Renee Amos – 4 pages received – Notice of Lack of Jurisdiction and Divestiture Confirmation; Emergency Notice of Prohibited Fee Enforcement; Notice of Correction of False Addresses and Appellate Misrepresentations

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

FAX COVER SHEET

TO	Clerk Abshire
COMPANY	
FAX NUMBER	3374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 12:40:05
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is a fax

23-2124 COVER LETTER

TO CLERK OF COURT

LAKE CHARLES CITY COURT WARD THREE

Please file the enclosed Motion Proposed Order and Certificate of Service in Case Number 23 2124 King versus Amos.

Respectfully

John C King Sr

Combined Motion to Vacate Divested Orders

NO 23 2124

CITY COURT OF LAKE CHARLES

WARD THREE

CALCASIEU PARISH LOUISIANA

JOHN C KING SR

Plaintiff

versus

RENEE AMOS AND THE HARTFORD

Defendants

Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard

Plaintiff John C King Sr submits this motion to preserve all rights before the statutory deadline. Plaintiff requests that the Court vacate all actions taken after divestiture of jurisdiction remove all improper and retaliatory costs strike all contempt related actions seal identifying information and recuse Judge Ronald C Richard due to bias hostility and misconduct.

Background

Plaintiff is the sole plaintiff in this matter. His spouse S J K has never been a party to this case. Judge Richard nevertheless ordered her to appear in court without jurisdiction service or lawful authority. She is a non resident and a protected crime victim.

Summary of Misconduct

Judge Richard did the following

Accused spouse of practicing law without basis.

Forced a non resident non party to appear under threat.

Threatened to send the District Attorney across state lines.

Denied Plaintiff and spouse access to legal counsel.

ELECTRONIC

FILE DATE: 11-13-2025

Forced disabled spouse to remain without medical accommodation.

Ordered courtroom doors locked during the November 2024 hearing.

Read spouse private address into the public record.

Created circumstances leading to a December 11 2024 intruder incident in Houston Texas.

Lost jurisdiction on December 3 2024 under article 2088.

Held hearings on December 18 and December 30 after divestiture.

Rescinded pauper status without a contradictory hearing.

Created fabricated Iowa Louisiana service addresses and false fees.

Issued retaliatory contempt without cause or notice.

Allowed false appellate statements by Mr Bauman including a false claim the homicide occurred in Iowa Louisiana.

Ignored that neither of Plaintiff parents ever lived in Iowa Louisiana.

Legal Basis

Orders after December 3 2024 are null under article 2088.

Recusal required under article 151.

Constitutional violations include amendments One Four and Fourteen.

Misconduct violates Louisiana Revised Statutes 14 134 14 118 14 122.

Disability protections under ADA Title Two were violated.

Victim protections under Louisiana and federal law were violated.

Relief Requested

Recusal of Judge Ronald C Richard.

Vacatur of all orders rulings costs and contempt actions after December 3 2024.

Removal of all fabricated service fees linked to Iowa Louisiana addresses.

Sealing of any document that contains Plaintiff or spouse identifying information.

Reassignment to an impartial judge.

Any further relief necessary to protect Plaintiff from retaliation.

Respectfully submitted

John C King Sr

123 N Louisiana Avenue

Lake Charles Louisiana 70601

Certificate of Service

I certify that a copy of this motion was served on all parties by email on this date.

Signed John C King Sr

23-2124 CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I certify that the Combined Motion Proposed Order and Cover Letter were served via email on all parties on November 13 2025.

Signed

Verified by pdfFiller
11/13/2025

John C King Sr

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

ACTS FAX

ACTS FAX **ACTS FAX ACTS** FAX **ACTS** FAX

ACTS FAX

DATE:

02/06/2025

From:

Heather Goleman, Deputy Clerk

(337) 433-9403

SUBJECT: **Louisiana** 3rd **Circuit Case** No. **CW** 25 **00044**

Lower Court Case No.: 2023-2124

Calcasieu

Fourteenth Judicial **District** C

To:

JOHN CLIFFORD J. KING VERSUS

RENEE AMOS NOTARY **PUBLIC**

ID #29374 **AND HARTFORD**

FIRE **INSURANCE** COMPANY

Hon. Ronald C. Richard Attorney at Law
330 Alamo Street
Lake Charles, LA 70601 Fax No.
(337) 494-1793 Work No. (337)
494-1900

Oliver Jackson Schrumpf Schrumpf &
Schrumpf 3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

LZS-1 8000/10ood L6Z-1

0697-161-*L88*

01001 PAY MORE 90:60 92-90-20

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson
Schrumpf

Edward Kelly Bauman

Counsel for:
John Clifford J. King

Counsel for:
Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider... motions [regarding pauper status]" Mason v. *Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v.* Ferrington, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of *the* order of appeal, the trial court does not have jurisdiction to hear *the* pro se motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

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0692-167-188

o PAY WOUD 90:60 92-90-20

SIZ SJG

JWP

Affidavit of Transmission

Attention: John C. King Sr

Fax No. 508-524-2132

Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C. King Sr vs. Renee Amos – 12 pages received – Combined Motion to Vacate Divested Orders

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

Monica Abshire

From: Monica Abshire
Sent: Thursday, November 13, 2025 4:01 PM
To: True King
Subject: Emailing: 23-2124 King vs Amos - Affidavit of Transmission
Attachments: 23-2124 King vs Amos - Affidavit of Transmission.pdf

Please see attached the Affidavit of Transmission.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs Amos - Affidavit of Transmission

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX -

DATE: 02/06/2025

From: Heather Goleman, Deputy Clerk
(337) 433-9403

SUBJECT: Louisiana 3rd Circuit - Case No. CW 25 00044
Lower Court Case No.: 2023-2124
Calcasieu
Fourteenth Judicial District C

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

To: Hon. Ronald C. Richard
Attorney at Law
330 Alamo Street
Lake Charles, LA 70601
Fax No. (337) 494-1793
Work No. (337) 494-1900

Oliver Jackson Schrumpf
Schrumpf & Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson Schrumpf	Counsel for: John Clifford J. King
Edward Kelly Bauman	Counsel for: Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, . . . on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider . . . motions [regarding pauper status]" *Mason v. Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v. Ferrington*, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of the order of appeal, the trial court does not have jurisdiction to hear the pro se

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0002/0003 F-327

motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

SJG	JWP	CD

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0003/0003 F-327

COURT OF APPEAL

THIRD CIRCUIT

STATE OF LOUISIANA

NO.

JOHN CLIFFORD J. KING

Plaintiff/applicant

VERSUS

RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY

Defendants-respondents

APPLICATION FOR WRIT OF REVIEW TO THE THIRD CIRCUIT
COURT OF APPEAL

NO.

FROM THE WARD 3 / LAKE CHARLES CITY COURT PARISH OF
CALCASIEU, STATE OF LOUISIANA NO. 23-2124

HONORABLE RON RICHARD, PRESIDING

ORIGINAL APPLICATION AND BRIEF OF PLAINTIFF- APPLICANT,
JOHN CLIFFORD J. KING,
FOR WRIT OF REVIEW TO THE LAKE CHARLES CITY COURT And REQUEST FOR EXPEDITED CONSIDERATION And STAY

A CIVIL CASE

Respectfully
submitted:

Oliver Schrumpf

Oliver "Jackson" Schrumpf"
Attorney for Applicant
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
Appeal Counsel
Bar Roll No. 11832

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I. APPLICATION FOR WRIT OF CERTIORARI

The application of JOHN CLIFFORD J. KING, plaintiff, and Oliver Schrumpf, Attorney, respectfully represents:

A. Applicant is aggrieved by the orders of the Honorable Ronald Richard, Ward 3 / Lake Charles City Court Judge on December 30, 2024 and applicant *is* entitled to have this honorable court grant a supervisory writ to review and reverse those orders.

B. A statement of the considerations required by Rule 4-5 C. of the Uniform Rules of Courts of Appeal, a memorandum setting forth the statement of the case, an assignment of errors, a summary of the argument, and an argument addressing the assignments of error on the facts and law; a verification of the application, and appendix containing the requisite

exhibits, are all annexed here and made a part of this application.

A request for expedited consideration and stay of proceedings pending decision is attached.

Wherefore, applicant prays that after due consideration, in the discretion of this honorable court, that a supervisory writ be granted, and that thereafter the orders of the Ward 3/ Lake Charles City Court aggrieving applicant be reversed:

A. Reinstating the pauper status of John Clifford J. King, Plaintiff;

and

B. Staying further hearings pending the devolutive appeal.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF Attorney for applicant

Sworn to and subscribed before me this

Bla ne

Notary Public

Jinhifer L. LeBlanc
Notary No. 55493

23rd day of January, 2025.

REQUEST FOR EXPEDITED CONSIDERATION AND STAY OF PROCEEDINGS

The Trial Court has granted a stay suspending the Court's Order for counsel to appear on January 15, 2025 to represent John King and/or Shunte King in matters set by the Court for hearing (contempt and hearings on the motions filed by King In Proper Person), but counsel prays that this Court of Appeal grant expedited consideration of this application and stay all trial court proceedings pending decision on this application and eventually the devolutive appeal.

The trial Court's sua sponte retroactive rescission of its pauper order in this case will prevent the pauper plaintiff, John King, from pursuing a devolutive appeal unless this application is granted and the trial court order is reversed.

Additionally, the trial court is attempting to exert its control over the plaintiff (and plaintiff's spouse) who reside in New Jersey, by ordering local

counsel to appear at hearings for which Counsel does not represent the plaintiff and for which counsel will not be compensated.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

II. STATEMENT OF THE CONSIDERATIONS WARRANTING THE GRANTING OF WRITS

A. **Orders issued after jurisdiction divested.**

A judgment was rendered on November 14, 2024, after trial on the merits. The judgment denying all of plaintiff's requested relief was signed on November 21, 2024.

In

An order of appeal was entered on December 3, 2024 granting a Devolutive appeal from the Judgment dated November 21, 2024. accordance with La. C.C.P. 2088, jurisdiction is "divested" except for certain limited exceptions (none pertinent here). On December 30, 2024, the Court issued orders not allowed under La. C.C.P. 2088.

(1) Retroactively rescinding the Order granting plaintiff Pauper status, and

(2) Ordering Oliver Schrumpf to represent the plaintiff in contempt proceedings for pleadings and communications made by plaintiffs with court personnel before and after the appeal was entered.

B. **Interference with Attorney-Client** contract.

Despite the jurisdiction of the Court being divested, the Trial Court ordered counsel for John King in the primary case (King vs Amos and Hartford) to appear on December 30, 2024 without any advance notice of what issues were to be heard; and then on December 30, 2024 ordered counsel to appear again on January 15, 2025, [Apparently, post trial, John King filed pleadings In Proper Person after the trial court jurisdiction was

divested and the Court wants to hold King in Contempt for the allegations

being made by King or the Court wants counsel to represent King in the claims King made In Proper Person. [The trial Court should have merely declined to take any action since its jurisdiction is divested.] Counsel only represents John King on the claim against the Notary and her bonding company for executing a bill of sale when John King was in New Jersey or New York and not present in Lake Charles, La. Counsel has advised King to retain separate counsel for any contempt proceedings. But since King continues to reside in New Jersey, the Court is attempting to gain control over King through counsel in the core case. Counsel has less control over the actions of John King than the Court does.

C. **Sua Sponte Rescission of In Forma Pauperis order**.

Not only was jurisdiction of the Trial Court divested by the appeal

order, but the Trial Court then, without notice or contradictory hearing, announced that the Court was Sua Sponte Rescinding the previous order granting pauper status. The Court claimed grounds as Mr. King's spouse is not a "third party" suitable to sign the affidavit of poverty. {But see La. C.C.P. 5183, prohibiting only the party's **attorney** from signing as the third party.} The Trial Court also made reference to some out of court communication by King about attorney fees, but without advance notice, no opportunity for meaningful response was granted to plaintiff. The effect of rescinding pauper status is to require plaintiff to pay thousands of dollars in Court fees immediately in order to have the Trial Court's decision reviewed by the Court of Appeal, effectively denying plaintiff an appeal. Additionally, the Court is ordering counsel to represent King in matters that

counsel has not been retained to represent King in. This is taking time and

effort of counsel without compensation.

C. Why expedited granting of writs is appropriate in this case.

Plaintiff fully intends to pursue the devolutive appeal on the merits of

this case and believes that upon review, the Trial Court decision will be

reversed. However, the actions of the trial court, taken after jurisdiction

was divested, effectively deny plaintiff a right of appeal.

CONCLUSION:

The decisions of the Trial Court made on December 30, 2024 should be reversed:

A. John King's Pauper Status should be maintained.

B. Oliver Schrumpf should be relieved of the Order that he represent John King in contempt proceedings, or in issues filed In Proper Person by King after jurisdiction divested.

C. Further proceedings in the trial court should be stayed while the matter is heard by the Court of Appeal.

III. MEMORANDUM OF LAW

A. Statement of the Case and Prior Proceeding

FACTS:

John Clifford J. King contacted Oliver Schrumpf on October 31, 2024 requesting Schrumpf represent him in a case against a Louisiana Notary (Rene Amos) who had notarized a vehicle transfer of King's vehicle on September 7, 2021 at a time when the owner of the vehicle (John King) was out of the state of Louisiana (in New Jersey or New York). King e-mailed a

copy of the petition and a copy of the investigation report from the Calcasieu Parish Sheriff's office to Schrumpf. On November 6, 2024, Schrumpf agreed to represent King in the matter against the Notary. On November 7, 2024 Schrumpf filed a Motion to Enroll and a Motion to Continue the case (then set for trial on November 14, 2024). The trial court ordered Schrumpf to appear for a hearing that day (November 7, 2024) before authorizing the enrollment. Judge Ron Richard advised Schrumpf that John King had been filing ex parte communications with the Court making allegations that the Court did not appreciate and that the case had

been set for trial several times. The Court granted the enrollment but denied the Motion to Continue and confirmed that trial would occur on November 14, 2024. The Court also denied a request for plaintiff to appear via Zoom unless he could provide to the court an excuse signed by a physician by Monday, November 11, 2024 (*a* judicial holiday). Schrumpf advised his client that he must obtain a signed excuse from a doctor and have it to the Court by Monday, November 11, 2024 or make arrangements to be present for trial on November 14, 2024. The Court and Schrumpf's office were closed November 11, 2024 (Veteran's Day). King e-mailed a document signed by a doctor to the court on November 11, 2024, but, despite a back condition, managed to fly from New Jersey to Lake Charles to be present for the trial. The trial court found that Mr. King in deed was not in Lake Charles on the date the notary claimed she notarized his signature, but the court ruled against Mr. King on November 14, 2024, and signed a judgment denying his claim on November 21, 2024. The result of the trial is the

subject of a devolutive appeal granted December 3, 2024. However, this present Writ Application involves the Court's order for Schrumpf to appear for a hearing on December 30, 2024 after jurisdiction of the trial court had divested, and the Court's Sua Sponte rescission on December 30, 2024 of the Pauper Order previously entered in the case.

IV. ACTIONS BELOW:

A. On December 30, 2024, the Trial Court SUA SPONTE and without prior notice, rescinded its prior order granting pauper status to John King. This in effect denies King's right to appeal the decision on the merits of the case unless he can find several thousand dollars to pay costs within 20 days.

B. On December 30, 2024, the Trial Court Ordered Oliver Schrumpf to represent John King in contempt proceedings for filing of ex parte pleadings with the Lake Charles City Court on December 12, 2024 or at trial of the issues raised by those pleadings. The pleadings were filed by John King via e-mail. Even though King copied the pleadings to Schrumpf, Schrumpf neither assisted,

counseled, or even knew that the pleadings were being prepared or filed by King. Schrumpf did not contract to represent King on contempt charges or on the clams raised in those pleadings, and after the claims were brought to Schrumpf's attention by the Court, Schrumpf advised King he should contact an attorney with criminal law expertise to represent him on the contempt counts.

Schrumpf does not hold himself out as current in practicing criminal law.

V. SPECIFICATIONS OF ERROR AND ISSUES FOR REVIEW

A. The Trial Court erred in taking action after trial court jurisdiction divested to retroactively rescind the Pauper status of John King, thereby depriving the pauper plaintiff of a right of devolutive appeal.

B. The Trial Court erred in ordering attorney Oliver Schrumpf to defend

John King on charges for contempt of court or to try allegations raised in pleadings filed by John King In Proper Person which were done without knowledge, assistance, or counsel of attorney Schrumpf.

VI. SUMMARY OF ARGUMENT

A. **Pauper Status:** Jurisdiction of the trial court divested on December 3, 2024 with the granting of the devolutive appeal [See Order Granting Appeal, Appendix C and La. C.C.P. 2088]. Thereafter the trial court did not have jurisdiction to order counsel to a hearing on December 30, 2024 or to SUA SPONTE retroactively rescind the order granting pauper status to John King. {See transcript December 30, 2024, p. 21} Furthermore, the Court's reasoning for rescinding the Pauper Order was erroneous: Mrs. King is not a "third party disallowed from signing as an affiant". See La. C.C.P. 5183 A. (2). Additionally, the Court may only reconsider its original order granting the application "in a contradictory hearing" [La. C.C.P. 5183 B.

(3)]. This process would require notice and an opportunity to prepare for the hearing, which did not occur on December 30, 2024.

B. **Ordering Counsel to represent Mr. King in a Contempt Proceeding.**

When John King sent an e-mail to the Lake Charles City Court on December 12, 2024 (and copied the e-mail to Oliver Schrumpf), the Court was upset with Mr. King's conduct and wanted to punish him, but the Court did not have jurisdiction to entertain Mr. King's pleadings. The proper action of the Court would have been to decline to take any action on the pleadings until jurisdiction is returned to the trial court. Instead, the Court ordered Oliver Schrumpf to appear on December 30, 2024 and on that date, the Court Ordered Oliver Schrumpf to appear January 15, 2025 to defend John King on contempt charges and/or to represent Mr. King on the matters in his December 12, 2024 In Proper Person pleadings. Oliver Schrumpf did not counsel Mr. King to file the December 12, 2024 pleadings, did not prepare the pleadings, did not sign the pleadings, and did not know that Mr. King had in mind to file the pleadings. More importantly, Oliver Schrumpf did not contract to represent Mr. King on any of the claims made in his December 12, 2024 filing. The Court Ordering Oliver Schrumpf to pursue

claims on behalf of John King that Schrumpf did not contract to perform exceeds the authority of the Court. When jurisdiction is returned to the trial court, the Court may set *a* hearing and notify John King of the hearing date and if Mr. King appears in person or hires an attorney to represent him, the Court may then make rulings on Mr. Kings' pleadings as appropriate.

Oliver Schrumpf should not be commanded to use his time and effort to pursue matters he did not undertake in his agreement with Mr. King.

VII. ARGUMENT AND LAW

A. THE TRIAL COURT'S JURISDICTION OVER THE CASE DIVESTED WHEN THE ORDER OF DEVOLUTIVE APPEAL WAS GRANTED ON DECEMBER 3, 2024.

See Order granting Devolutive Appeal. Appendix C.

La. C.C.P 2088 provides:

Art. 2088. Divesting of jurisdiction of trial court

A. The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal and the timely filing of the appeal bond, in the case of a suspensive appeal or on the granting of the order of appeal, in the case of a devolutive appeal. Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following:

1433.

2125.

(1) Allow the taking of a deposition, as provided in Article

(2) Extend the return day of the appeal, as provided in Article

(3) Make, or permit the making of, a written narrative of the facts of the case, as provided in Article 2131.

(4) Correct any misstatement, irregularity, informality, or omission of the trial record, as provided in Article 2132.

(5) Test the solvency of the surety on the appeal bond as of the date of its filing or subsequently, consider objections to the form, substance, and sufficiency of the appeal bond, and permit the curing thereof, as provided in Articles 5123, 5124, and 5126.

(6) Grant an appeal to another party.

(7) Execute or give effect to the judgment when its execution or effect is not suspended by the appeal.

(8) Enter orders permitting the deposit of sums of money within the meaning of Article 4658.

(9) Impose the penalties provided by Article 2126, or dismiss the appeal, when the appellant fails to timely pay the estimated costs or the difference between the estimated costs and the actual costs of the appeal.

(10) Set and tax costs, expert witness fees, and attorney fees. (11) Certify a partial judgment or partial summary judgment in accordance with Article 1915(B).

(12) Amend a judgment to provide proper decretal language under Article 1918 or 1951.

B. In the case of a suspensive appeal, when the appeal bond is not timely filed and the suspensive appeal is thereby not perfected, the trial court maintains jurisdiction to convert the suspensive appeal to a devolutive appeal, except in an eviction case.

Amended by Acts 1964, No. 4, §1. Acts 1968, No. 128, §1. Acts 1977, No. 175, §1, eff. Jan. 1, 1978. Acts 1983, No. 126, §1; Acts 2008, No. 658, §1; Acts 2021, No. 259, §2.

Accordingly, the Trial Court had no authority to Sua Sponte rescind the In Forma Pauperis Order previously granted in the case, nor to Order Oliver Schrumpf to appear at hearings or to defend John King on contempt charges or pursue Mr. King's In Proper Person filings which occurred after the Court's jurisdiction had divested. The trial court should have simply declined to take any action on the In Proper Person pleadings filed by Mr. King after jurisdiction divested.

Alternatively, even if this Court finds that the trial court retained jurisdiction to reconsider the granting of the application for pauper status, the Court's ruling should be reversed because: the grounds stated are contrary to law: [Transcript of December 30, 2024 p. 21 the Court found that Mrs. King was "not a third party" as required by La. C.C.P. 5083]. In fact, La. C.C.P. 5083 A. (2) specifically states: "the affidavit of a third person other than the applicant's attorney...". Therefore, a spouse qualifies to sign the affidavit of poverty unless she is also "the applicant's attorney".

Finally, even if the Court of Appeal does not find fault with any of the foregoing, the statute allows the court to reconsider its original order

"on its own motion at any time **in a contradictory hearing.**" {La. C.C.P. 5083 B. (3). A contradictory hearing would provide notice and an opportunity to be heard which did not occur on December 30, 2024. Had there been notice of the issues to be considered (including reconsideration of pauper status), counsel may have been able to offer evidence to contradict the Court's claims. For instance, Mr. King did not have $12,000 to pay attorneys. But Mr. King may have received grants from civic organizations to help him pay attorneys because of the wrongs which had been done to him when his vehicle was stolen and a Louisiana Notary purportedly notarized his signature on September 7, 2021 at a time when Mr. King was in New Jersey or New York.

CONCLUSION

This application for supervisory writs should be granted to reverse the orders of the trial court on December 30, 2024: A. Retroactively rescinding the Pauper Status Order previously granted to John King; and B. Ordering Oliver Schrumpf to appear and represent John King on contempt or other matters raised in In Proper Person pleadings filed by John King after the Court's Jurisdiction had been divested.

Respectfully submitted by Attorney for Applicant, JOHN CLIFFORD J. KING and his attorney, Oliver Schrumpf

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF, Appeal Counsel

Bar Roll No. 11832

3801 Maplewood Drive

Sulphur, LA 70663

Phone: (337) 625-9077

VERIFICATION

I certify that the allegations in the foregoing application for writ of certiorari are true and correct, to the best of my knowledge, information, and belief, and that a copy of this application has been delivered to the Trial Judge, Ron Richard, via e-mail ron@lccitycourt.org

Date

and to the below listed counsel for defendant:

Ed Bauman via e-mail ed@lakecharlesattorney.com

Oliver Schrumpe

OLIVER "JACKSON" SCHRUMPF

•23rd

Sworn to and subscribed before me this

Leb

lon

Jinnifer L. LeBlanc
Notary No.
55493

Notary

day of January, 2025.

CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing Application for Writ of Review and for Stay has been served on the presiding trial judge and all opposing counsel, by depositing a copy in the U.S. Mail, postage prepaid, properly addressed to all counsel, and to the Third Circuit Court of Appeal, to wit:

Third Circuit Court of Appeal
Judges
P.O. Box 16577
Lake Charles, Louisiana 70616
by Hand Delivery

Ed Bauman
Counsel for Defendants,
Amos and Hartford
Lake Charles, La. 70602-3010
Via e-mail: ed@lakecharlesattorney.com

Judge RON RICHARD
ron@lccitycourt.org
Judge, Ward 3/Lake Charles City Court

Thus done at Sulphur, La. This 24 day of January, 2025.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

APPENDIX

TAB #

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A. Final Judgement November 21.2024 19-20

B. Motion for Devolutive Appeal 21

C. Order granting Devolutive Appeal December 3, 2024 22-23

D. Copy of order granting Pauper status August 13, 2024 24-27

E. Motion to be Excused from Hearing denied by Judge 29-30

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MinuteID: 1869063

JOHN CLIFFORD J KING

STATE OF LOUISIANA, PARISH OF CALCASIEU CITY
COURT OF LAKE CHARLES

Vs. No.
23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 2937

You are hereby notified that a:

NOTICE OF

JUDGMENT

TO: **John** Clifford J King

Thru: Attorney Oliver Jackson Schrumpf
3801 Maplewood Drive
SULPHUR, Louislana

of said **Parish** Calcasieu

JUDGMENT

has **been** filed on

11/21/2024

11/19/2024

and signed by Judge Judge
Richard

.on.

in the above numbered and entitled cause as per certified copy attached heret

Witness the HONORABLE JAMIE B. **BICE** RONALD C. RICHARD**, Judges** of said **Court**,

this 21 day of November 2024

май

TRUE **COPY**

Deputy Clerk of **Court**

23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that Notice of Judgment was mailed to the plaintiff, John Clifford J King through attorney Oliver Jackson Schrumpf and to defendant, Renee Amos through attorney Kamie T. Dominic this 21st day of November 2024.

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CLER K

Ronald G. Richard

10 11-21-2004

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JOHN CLIFFORD J KING

:

RECD LG CITY COURT CIV

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LAKE CHARLES CITY COURT

VS. NO. 23-2124

RENEE AMOS
NOTARY PUBLIC
NOTARY ID #29374

FILED:
11-19-2014

PARISH OF CALCASIEU

STATE OF LOUISIANA

JUDGMENT

Malini

DEPUTY CLERK OF COURT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, **and** his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing

this matter and for reasons orally assigned, entered the following judgment:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT READ and SIGNED this 21st day of November 2024, in Lake Charles, Calcasieu Parish, Louisiana.

RON RICHARD, JUDGE DIVISION B JUDGE, LAKE CHARLES CITY COURT

Ronald G. Richard

AY QUE COPY 1846
1-21-2004
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Chork

JOHN CLIFFORD J KING

VERSUS NO. 2023-2124

WARD 3/LAKE CHARLES CITY COURT

PARISH OF CALCASTEU

RENEE AMOS NOTARY PUBLIC ID #29374

STATE OF LOUISIANA.

FILED:

122-2034

Malekin

DEPUTY CLERK OF COURT

MOTION AND ORDER FOR DEVOLUTIVE **APPEAL**

ON MOTION OF Oliver "Jackson" Schrumpf, counsel for John Clifford J King, plaintiff

herein, for a devolutive appeal from the judgment rendered November 14, 2024, read and signed

November 21, 2024**,** notice of which was mailed November 21, 2024, and from the judgment

(Ruling") denying plaintiff's claims against Renee Amos.

IT IS ORDERED that a devolutive appeal be and is hereby granted to John Clifford J King

and that the appeal be returnable to the Court of Appeal, Third Circuit, State of Louisiana, at Lake

Charles, Louisiana, upon payment *of* costs in accordance with law.

SO ORDERED *this* 3rd day of Decendo 2024, in Lake Charles,

Calcasieu Parish, Louisiana.

Prepared by:

JUDGE ROR RICHARD

Ronald G. Richard

BY:

Oliver

Schramgez

OLIVER JACKSON" SCHRUMPF #11832
SCHRUMPF LAW OFFICE,
A Professional Law
Corporation
3801 Maplewood *Drive*
Sulphur, Louisiana
70663
(337) 625-9077; Fax (337) 625-8231
oschrumpf@schrumpf-law.com

*:
.

12-3-2004 Math

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

FILED:
12/5/2004

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU

STATE OF LOUISIANA

Kinky Bay

DEPUTY CLERK

ORDER

Considering the petition for devolutive appeal wherein JOHN CLIFFORD J

KING was granted a devolutive appeal from the judgment rendered in the above entitled and numbered cause, returnable in the Court of Appeal, Third Circuit, State of Louisiana, on the 16th day of January, 2025.

Lake Charles, Louisiana, this 5th day of December, 2025.

RONALD RICHARD
CITY JUDGE,
DIVISION B

Suit No. **23-2124**

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a certified copy *of* the Motion and Order for Devolutive Appeal signed by Judge Ronald C. Richard has this 3rd day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

Malkie

CLERK

John C. J. King Sr.

Vs. No. 23-2124

Renee Amos

1-30.2024

FILED

LAKE CHARLES CITY COURT

WARD THREE

CALCASIEU PARISH

STATE OF LOUISIANA

жавий

TY CLERK OF COURT

In *Forma Pauperis* AFFIDAVIT

All questions must be answered in full.
Clients **of** Federally Chartered Legal **Services Corporations** only answer questions **1-8 and 11-13.**

1 Full Name John **C.** J. King Sr

Social Security No. 1934

Date of Birth 04-17-1986

Ser M

2. Address 123 N. Louisiana Ave. Lake Charles, LA

(Box **No.** or Street **Address)**
(**City**)

3. Telephone **No(s).**
318-995-1705

(Home**)**

(State and Zip **Code**)

(**Work**)

4. Are you a student**?** yes

If **so,** please indicate the name of the school **you are** attending**: Essex** Vocational and Technical

5. What is your occupation**?** Temoirary Disabled UnemploymentAre you employed**?** 6. **Injured**

Name of your employer
Address

None

N/A

How long have you been **so employed?**

Telephone No.

If unemployed, list the name of your last **employer** ETC If unemployed**,** how long have you been unemployed

6 Months

Monthly Wages

Federal Income **Tax 14944**

6. Income: Weekly Wages $0

$0

Monthly deductions:

Employer's

FICA

Other

deductions

Any others.

Încome

Is your income **less** than or equal to 125**%** of **the** federal poverty level**? yes**

7. Marital Status:

Single___Married

Separated_

How many children do you support who are under **18?** 3 How many children live with **you?** 2

Do you have **any** other dependents**?** relationship:

ELECTRONIC

FILE DATE:

7-30-2004

Divorced Widowed Concubine

State names, ages, and

24

Jayla King:15;daughter / **John** King Jr;14**;son /** Jakai King,**5;son**

Is your spouse employed**? No** spouse's **employer**

Graduate Student Spouse's
employer's address N/A
Telephone No. 318-995-1705

If so, please indicate the name **of** your

Wages**:**
Weeklys

Monthly **S**

8. Do you or your spouse receive any **of the following** income or **support?**

If so, please state the monthly amount:
SSIO
TANFO
Child support
Disability **0**
Workers **comp**
0
Rent Supplement ©
Unemployment benefits
Food **stamps**

9. **Do you own or** have **an** interest in any **of** the following**?** (Including community **property)**

House o
Value $0

Balance **owed** $0

Auto 0

Value $0

Balance owed $0

Truck **0**

Value $0

Balance owed 30

Watercraft

Value $D

Balance owed **$0**

Livestock 0

Value $0

Balance owed **$0**

Machinery

Value $0

Balance owed $0

Stock

Value **$0**

Bonds

Value $0

Certificates of Deposit

Value $0

Other immovable **property 2**

Equity $**0**

Debt $0

Value $0

Bank account

Name and location of bank**:**

Capital One

10. Please list your monthly expenses:

Rent 1600 Student Lot rent

Garbage

Electric 200

Medical expenses

Water Property taxes

House note

Telephone **90**

House ins.

Gas

Dental expenses_

Life ins.

120 Monthly Car note

Food

Barber/beauty

Car ins Entertainment

Cable

Med. ins.

Prescriptions

Transportation_

Child support_

Daycare

Cleaning **supplies**/toiletries

Support for children other than those of this marriage

Credit cards (List type of card and monthly payment**)**

Other

Garnishment

Discover			
Mastercard			
Visa			
Visa			
	$15500		
	$ **4000**		
	$ **2000**		
	$ 1800		
		200	
		150	
		220	
		140	

Loans **(**List the financial institution **and the** amount **you** pay monthly**)**

TOTAL MONTHLY EXPENSES **$ 2820**

$

$

11. **Does** anyone regularly help you pay your **expenses?** no

person's name and relationship to you N/A

If so, please state that

Do you have **any** additional income or assets that are not shown above**? If so**, please explain_

N/A

12. What arrangements have you made to **pay** your attorney's fee and what amount, **if** any have you paid**? (You** are required to answer fully**.)**

Pro-Se

13. Has your attorney **explained to** you that it is a crime punishable by imprisonment to intentionally give a false answer to any **of** the above questions**?** yes

State of Louisiana, **Parish** of **Calcasieu**

BEFORE ME, personally came and appeared_

who **after** being duly sworn, deposed and said that:

John C. 3'

Kiay SR

(S)he is a citizen of the United **States** of America **and** is presently **domiciled** in **and a** resident of Louisiana.

(S)he is the person who furnished the information **above**; **that (s)he** has signed the petition**;** that the information is furnished to the court for the purpose **of** requesting permission to litigate the **above** captioned lawsuit without **paying** the costs in advance or as they accrue or furnishing security therefor**.**

That the foregoing petition and that all allegations of fact therein contained **are** true and correct**;** and that because of his/her poverty and want of means**, (s)**he is unable to pay the costs of court in advance or as they accrue, nor is (**s**)he able to provide bond therefor.

3/

Applicant's Signature

NOTICE

Although you may be granted **the** privilege of proceeding without **prepayment of** costs, should judgment **be** rendered against you, YOUR **STATUS** AS A **PAUPER** DOES NOT RELIEVE YOU OF THE OBLIGATION TO PAY THESE COSTS.

The privilege to proceed **In** Forma Pauperis is restricted to litigants who are **clearly** entitled to do so, with due regard to the nature of the proceeding, the court costs which otherwise

would have to be **paid**, and the ability of the litigant to pay them ro **to** furnish security therefor, so that the indiscriminate filing of lawsuits may be **discouraged,** without depriving a litigant of the benefit of proceeding In Forma Pauperis **if (s)**he is entitled to **do**

SWORN **TO** AND SUBSCRIBED BEFORE ME, **a Notary Public in** Hudson County

Louisiana, this

New

Jersey

IMPRM MA

30

day of

ERDE WARDR, MA

20 24

Sale Medicum

Notary **Public**

THIRD PARTY AFFIDAVIT

The BEFORE ME, personally come and appeared Muple Jover King

who after being sworn, deposed **and** said **that (s)he knows** con CT hey ! well and that (s)he knows that because of his/her poverty **and** want of means, **(she** is unable to pay the costs of court in advance or as they accrue, nor is **(s)he** able to **provide** bond therefor.

JAKE **G** MULRENAN Notary **Public**, State of New Jersey Comm. **#50215247**
My Commission Expires
10/16/2028

Afiíap
t

SWORN TO AND SUBSCRIBED BEFORE ME, a Notary Public in

Hudson County

Lonistama, **this**

20

24. New

Jersey

30m

Notary Public

day

of

July

JAKE G MULRENAN
Notary Public, State **of** New Jersey Comm. # 50215247
My Commission Expires 10/16/2028

LEGAL SERVICES DECLARATION

BEFORE ME, personally came and appeared

who is a duly authorized representative of Acadiana Legal Services Corporation or Southwest Louisiana Legal Services, or a pro bono program receiving referrals from **one of** the aforementioned organizations, states that

has

produced evidence that (s)he **receives** public assistance benefits, or that **(s)he** has qualified to receive free legal services based on his/her income being **less** than or equal to **125**% of the federal poverty level and therefore is entitled to a rebuttable presumption that **(s)he is** entitled to the privilege of litigating without prior payment **of** costs.

Legal Services Representative

ORDER

Considering the foregoing petition and

affidavits:

IT **IS** HEREBY ORDERED that

be permitted **to** prosecute or defend this litigation in accordance with Louisiana Code of Civil Procedure Article **5181,** without **paying the** costs in advance or as they accrue or furnishing-**security** therefor.

Signed this
chambers

13th day
ading 2024

Lake Charles, Louisiana.

Ronald C. Richard

A TRUE COPY
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10-2015

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Clerk

FAX COVER SHEET

TO

COMPANY

FAX NUMBER

FROM

DATE

RE

COVER MESSAGE

Pauper **Affidavit**

Attn **Clerk** of Court

13374911303

John **King**

2024-05-20 20:56:37 GMT King vs **Amos 23-2124**

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IN RE: JOHN CLIFFORD J. KING

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REC'D LC CITY COURT CIV.
$24 DEC 19 PM2:29

Lake Charles City
Court

Calcasieu Parish,
Louisiana

TACT

Deputy Clerk of
Court

MOTION TO BE EXCUSED FROM **HEARING**

Now comes Oliver "Jackson" Schrumpf, attorney, individually, who respectfully shows:

1. On November 7, 2024, Movant enrolled as attorney for John King in the matter

entitled John King vs. Rene Amos, No. 2023-2124, Lake Charles City Court.

2. The King vs Amos matter was tried on November 14, 2024.

3. Judgment was signed in that matter **on** November 21, 2024 and Notice of Judgment

was mailed by the Clerk on the same day.

4. An order granting a devolutive appeal of that judgment was granted on December 5,

2024.

5. In accordance with La. C.C.P. Art. 2088. Divesting *of* jurisdiction of trial court:

on

A. The jurisdiction **of the** trial court **over all** matters in the case **reviewable**

under **the appeal** *is* divested, **and that** of the **appellate** court **attaches,**

the granting of the **order of appeal**, in **the case of a** devolutive **appeal**.

Thereafter, the trial court has jurisdiction in the case only over those matters not

reviewable under the appeal, including the right to do any of the following: (none

applicable in this
case).

6. Jolm King has subsequently filed other pleadings in Lake Charles City Court and

John King, and his wife, have been cited to appear in other matters not involving the

Judgment subject to appeal. (Even if the wording of the pleadings filed by King was

vague or ambiguous, or even if it intended to refer to the judgment in 2023-2124,

regardless, the Court would not have jurisdiction to take any action on that particular

matter because the jurisdiction of the Court is
"divested").

7. Oliver "Jackson Schrumpf does not represent the John King or Shunte King in the

contempt matters or any other matters other than the devolutive appeal in King vs.

Rene Amos, No. 2023-2124.

8. On December 18, 2024, after e-mail exchanges by the Judge's paralegal and Oliver

Schrumpf, the Court, Judge Ron Richard, called Oliver Schrumpf and, by telephone, ordered Schrumpf to appear at a hearing on December 30, 2024 at 9:00 AM. Schrumpf protested that he does not represent the Kings on the newly filed pleadings

or on the contempt matters. Judge Richard, nevertheless said that the King pleadings

sought recusal *of* the judge as to all judgments, which Judge Richard believes means

even the judgment described in paragraph 3 above.

9. As attorney for John King in the King vs. Rene Amos, No. 2023-2124, Oliver

Schrumpf here shows that the trial court's jurisdiction over that judgment has been

divested and no action can be taken as to that judgment by the trial court.

Accordingly, Oliver Schrumpf requests the Court rescind its order for Oliver

Schrumpf to appear on December 30, 2024 and excuse Oliver Schrumpf from

appearing, reserving to John King the right to retain other counsel to represent him in

that matter.

Respectfully Submitted
By

SCHRUMPF LAW OFFICE,
A PROFESSIONAL LAW CORPORATION

BY:

Olien
Schrumpf
OLIVER JACKSON" SCHRUMPF
LA Bar Roll No. 11832
3801 Maplewood
Drive Sulphur, LA
70663 Tel-337/625-9077
Fax-337-625-8231
oschrumpf@schrumpf-law.co
m

ORDER

Considering the foregoing Motion, let OLIVER "JACKSON" SCHRUMPF be excused from

SCH

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appearing at the hearing currently fixed *for* December 30/2024 at 9:00 AM.

SIGNED in Chambers in Lake Louisiana, on this day of

Decembe

r

2024.

RON RICHARD, CITY JUDGE

Suit **No. 23-2124**

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARÍSH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a copy of the Motion To Be Excused From Hearing DENIED by Judge Ronald C. Richard has this 27 day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

Mechani

CLERK

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MINUTES OF THE COURT

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

DECEMBER 30, 2024

JUDGE RONALD C. RICHARD

Monica Abshire, Clerk

Arnold Bellow, Bailiff

Plaintiff, John Clifford J King, appears through attorney, Oliver Schrumpf

Defendant, Renee Amos Notary Public Notary *ID*# 29374 and Hartford Fire Insurance Company, appears through attorney Edward Bauman

COURT RULING:

The Court ruled that the four (4) motions filed by plaintiff John Clifford J King (not through *his* attorney) are fixed for hearing on Wednesday, January 15, 2025 at 9:00 a.m. and notice given to all parties in open court. The motions are: (1) Plaintiff's Emergency Motion to Recuse/Remove Honorable Judge Ron

Richard; (2) Plaintiff's Motion to Vacate Retaliatory Judgments; (3) Plaintiff's Motion to Strike and Seal Identifying Information from Public Record; and (4) Plaintiff's Motion to Intervene to Prevent Further Judicial Harassment and Loss of Life.

The Court ordered plaintiff's counsel, Oliver Schrumpf, to provide the plaintiff's New Jersey address to be sealed in an envelope for the Court only. Upon review of the address provided by Mr. Schrumpf, the Court rescinds the order as the address provided is already in the record (plaintiff's address on N. Louisiana Avenue in Lake Charles, LA).

The Court *sua* sponte rescinds the Order granting plaintiff's in forma pauperis status retroactive to the day of granting same, or August 13, 2024.

A TRUE COPY
1-10-2005
Maha
Date:

Clark

31 pages

LAKE CHARLES CITY COURT

118 West-Mill **Street** Lake **Charles**, LA 70601

STATEMENT

January 7, 2025

John Clifford J King

vs. 23-2124

Renee Amos Notary Public Notary ID# 29374

and

Hartford Fire Insurance Company

Transcript of testimony of hearing on December 30, 2024
Judge Ronald C. Richard

$ 170.50

paid in full

TA

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING

Plaintiff

*

*

NO. 23-2124

VERSUS

RENEE AMOS NOTARY PUBLIC

NOTARY ID# 29374

Defendant

* **** *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 30th day of December 2024, beginning at 9:00 a.m.

APPEARANCES

FOR THE PLAINTIFF,

JOHN CLIFFORD J KING:

OLIVER SCHRUMPF

SCHRUMPF LAW OFFICE, APLC 3801 MAPLEWOOD DRIVE

SULPHUR, LA 70663

(337) 625-9077

EMAIL:

oschrumpf@schrumpf-law.com

FOR THE DEFENDANTS,

RENEE AMOS NOTARY PUBLIC

NOTARY ID# 29374

and

HARTFORD FIRE INSURANCE COMPANY:

EDWARD K. BAUMAN

1801 RYAN STREET

LAKE CHARLES, LA 70601

(337) 491-0570

EMAIL:

ed@lakecharlesattorney.com

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PROCEEDINGS

* *

COURT CALLED TO ORDER

THE COURT:

co

Good morning everyone.

MR. SCHRUMPF:

Good morning Judge.

MR. BAUMAN:

Good morning Your Honor.

THE COURT:

Before we start court, I

would love
to recognize the
incredible
Miss Lois. Today is her 80th birthday. Miss
Lois, my intention,
uh,
since we had to
drag y'all
in today
for
this
special
fixing, my intention was to take you to
lunch
somewhere fancy but in light
of
Marshal Alcede's funeral, I would ask that
if I could take you to lunch maybe later
this week. All right. Okay. Calling the

23

matter of

let

me get

my

binders

24

unclipped

the matter

of,

uh,

John

25

Clifford King

good Lord, I can't find

one good style on this thing. Hold on.

John Clifford King versus Renee Amos and The Hartford Insurance Company, docket number 23-2124. I have called, sort of, this this quickie hearing to address a couple of matters. This case was the trial in this matter came before this court back on what date madame clerk?

CLERK:

14th. November 14th,

THE COURT:

November 14th? On November 14th trial was had in this matter.

Immediately thereafter, a hearing on contempt was had with regard to Mr. King and having said all that and having the history in place, let's go ahead and have appearances from counsel and then we'll discuss the matter. I believe we have new

counsel on board for

MR. BAUMAN:

That's correct Your Honor. Ed Bauman and I will be enrolling on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

Okay. I believe I signed, uh, a motion with the other lady

MR. BAUMAN:

Yes. You did Your Honor.

THE COURT:

I can't remember her name slips I just

MR. BAUMAN:

Kamie

THE COURT:

Kamie. Miss Kamie. Uh, she withdrew and you're enrolled, correct?

MR. BAUMAN:

Correct.

THE COURT:

Okay. Good deal. All right, go ahead Mr. Oliver. Make your appearance.

MR. SCHRUMPF:

I'm Oliver Schrumpf and as you know, I represent John King in the matter which is on appeal now and this Court has no jurisdiction to do anything on that case.

THE COURT:

Uh, well, we'll talk about that, all right?

MR. SCHRUMPF:

Okay.

THE COURT:

I I tend to tend to agree with you initially that, uh, appeal gets filed and we send it all up to the Third Circuit and we let them take care of

things, but I want to clarify something

real real quick. On

at trial, uh, and

before trial, I made it very clear to your

client Mr.

there King that

had been a

letters,

history

filings, of multiple

phone calls, contact, various things, with

the judge's

judge's office. He, uh, ultimately

retained you and I cautioned him then as

as as yourself that

he has counsel

well

and is represented, all pleadings are

to

be filed through you, okay? That's why we have lawyers in the case. I also will note for the record that at at the trial of this matter, We had the trial, and then immediately subsequent to trial, we held

our rule with for contempt regard to various behaviors of Mr. King. The

unfortunately, you advised the court that you were not retained to represent him with regard to the contempt matter and you existed the courtroom sir.

MR. SCHRUMPF:

Absolutely.

THE COURT:

Uh, and since that time, Mr.

King's efforts at filing things with this court have continued okay? As you well are aware and you've been copied on this and opposing counsel was not copied on these filings and

pleadings that were,

believe, made on December 12th, okay? And the reason I'm taking this rather unusual action of having us here today to talk about the matter is that, uh, on December 12th Mr. King filed various motions with the court which I believe you have copies of. Am I correct counsel?

MR. SCHRUMPF:

I was copied on the email.

THE COURT:

Okay. And, uh, we all agree that opposing counsel, Miss Kamie at the time, was not copied.

MR. SCHRUMPF:

I don't know.

THE COURT:

Well, if you look at his emails, she wasn't, okay? You were. I was

and madame clerk was but opposing counsel was not copied. Once again, this leads to more confusion about all parties not being properly advised as to what's going on in the matter. Specifically, he filed motions entitled Recuse to / Emergency Motion Remove Honorable Judge Ron Richard; Motion to Vacate Retaliatory Judgments; Motion to Strike and Seal Identifying Information from Public Record; Motion to Intervene to Prevent Harassment further Judicial and

Loss of Life. Once again, in those motions making substantially the very similar statements that led to the contempt rule in the first place. Now, I will admit Mr. Schrumpf, you caught me off guard when you

said, T

don't represent this gentleman with regard to contempt and you walked out the courtroom. There was so much going on that day due to the behavior of your client and quite frankly, his wife, that it caught me off guard. In hindsight, I would have instructed you to remain in the courtroom and advised you that you signed on to represent the guy

and
if
you
represent him, you can't just bifurcate
on his actions with
the representation
regard
to the
court
and
I
would have
required that you stay for the matter of
the rule
for contempt, okay? Now
since

this filing of December 12th that he has

and confusion the glaring made,

created by a lawyer saying,

chaos

I represent

the guy but not in everything in this case,

has become more apparent, okay? And so I

am instructing you now that you represent

him in this docket number, okay? And I am

going to set everything he

2

2

22

23

going to set

24

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filed. I'm

set for hearing and I'm gonna

give notice to everyone in this courtroom

of that hearing date and we're gonna come

back and have a hearing on it. The reason I'm not having a hearing on these things today because I think we had to get out of the way who's first, who. Okay, who's driving the And ship? you're either driving that ship or you're or you're not driving that ship. isn't a This family matter where one takes lawyer over property

settlement issues that come after custody and child support and all those sorts of things. This is the matter and in the very matter, he is continuing his behavior that is causing much chaos and confusion with the actual legal process. All right? I am

setting the matter for January 15th at a.m. You can have your client here or not. I prefer that all parties be here.

All parties are entitled here. to be I am instructing everyone to have their clients here, all right? But, we're gonna have hearing on these matters that day.

MR. SCHRUMPF:

What

THE COURT:

now I want to

MR. SCHRUMPF:

what is being said

THE COURT:

hold on one second.

MR. SCHRUMPF:

Okay.

THE COURT:

One of the reasons why I'm having to take this extraordinary action is that in Mr. King's motion that he filed himself without you, his lawyer, he makes

again statements allegedly accusing this court and its staff of improper behavior. In fact, on January, I believe it was 12th, uh, I mean I'm sorry, December I'm to next month. I'm just already jumping to hoping. On December 12th, uh, when these motions were filed, were filed, Mrs. King had either that day immediately before, OF called this courthouse, got Miss Kay Bang on the phone who is the paralegal that basically

runs upstairs for us and advised her that

my behavior and her behavior

had led to

the murder of a man in Iowa, Louisiana on

December 11th and that there were, uh,

quote/unquote, white man went her in-laws house looking for her due to me, uh, this court putting this case on PACER. Let the record reflect PACER is a federal court record retention filing service. Nothing from Lake Charles City Court would be available on PACER, whatsoever and that this gentleman was shot six (6) times and

killed in Iowa and that me and Miss Kay Bang are responsible for that. And then on top of it, that it was such a big deal, three (3) police helicopters were circling that part of Calcasieu Parish to locate the man. I'm Okay? giving you some background as to why we gonna get who's who running the ship on each side here.

All right? I will just note for the record that I have verified, verified, and my staff has law enforcement through Calcasieu Parish, that there were indeed no murders in Iowa, Louisiana on December 11th or according to one of the chiefs at the Sheriff's Department, no murders in Iowa at all this year. All right? And the closest police helicopter to be used in

in Louisiana with relations to

to Lake Charles would be Baton Rouge and I don't believe we have three (3) of them. Okay?

It's kind that of behavior that is necessitating me having a hearing on these issues but having me do what I'm doing today which is to say,

we're having the hearing and you're they're lawyer. You're his lawyer. Okay? That's the order of the

court. Now, in another matter, another issue, as you're aware, there is currently a rule of contempt that has been filed for this, noticed by this court with regard to Mr. King's wife, Mrs. Shunte King and, uh, service with regard to that rule, uh, this being due to her calling illegally calling 9-1-1 in the middle of the trial and having EMTs show up in this courtroom concerned that someone was having they had been told that someone was having a

seizure in the courtroom which was all a complete lie and a complete fabrication and untruth. The addresses provided by your client, both on Louisiana Avenue, Simmons Street, and the Iowa address have

all come back as, she does not live there, neither does he, although that's the information provided. Now, Mrs. King made certain assertions, uh, both in various writings, phone calls and on the stand in the trial wherein you were counsel, that there is some some very important reason as to why she is in witness

her

protection or something of that nature and her personal information should not be provided to the public or put in a public record due to, uh, some bad people wanting to get her and, uh, our understanding is that is what she alleged happened December 11th. That we released her whereabouts, or her contact

this bad man

information, and these

showed up at her in-laws house in Iowa,

of

death resulted, all

We have established is completely

Louisiana and

a

which

not true.

So what we

have here is your

client filing things with the court; his

wife calling the court making statements;

this court unable to serve her with regard

to that because the addresses they have

provided locally are indeed not valid. So, I am ordering you, and you may do this under seal and no will one See this. H want to be very clear. It will be placed in the record under seal. I am ordering you to provide the address of Mr. King at his home in New Jersey. This court, I will tell you right now, intends to have her served through Long Arm Statute.

MR. SCHRUMPF:

I'm

Say sorry. that again please.

THE COURT:

This court intends to have her served through Long Arm service. Okay? I'm ordering you to provide that today before you leave the courtroom.

MR. SCHRUMPF:

If I have it.

THE COURT:

You have an address for him.

You have received payment from him.

You

23

24

have it. This court is

court is done with people

playing coy with the rules and with the

25

law. This is the way it works. People get

a lawyer or they don't get a lawyer. They come to court. They state their case. If they win, they win. If they don't like it, they appeal. This is how it works but the kind of behavior that has been exhibited here will not be allowed and this court and it's staff being being accused of being involved in a murder will not be allowed.

Period. Now, having said my peace and what I have ordered to be done, the court can hear you.

MR. SCHRUMPF:

The court will what?

THE COURT:

Will hear you.

MR. SCHRUMPF:

Judge, I did not prepare the motions that were filed by Mr. King. I did not

THE COURT:

I agree with you.

MR. SCHRUMPE:

get counsel from it. I didn't know it was gonna be filed.

THE COURT:

I believe you.

MR. SCHRUMPF:

And I I have nothing to do with those motions.

THE COURT:

I believe you.

MR. SCHRUMPF:

Okay.

THE COURT:

One hundred percent (100%). I

do not think that you have been involved

in any of this behavior. I think you have

the reality of a a client who is probably

not listening to what I believe would probably be your very good advice. I .

I

you are very well respected by me.

I have always believed you to be an upright and intelligent and very capable attorney, uh, and I simply am going to require that, since you're the attorney on this case, you're the attorney for everything on this case with regard to Mr. King, okay? Now, so, my order is that's when the hearing on all of these things he filed, unless he

withdraws them before that date, okay?

That's I that guess resolves that matter.

MR. SCHRUMPF:

Unless what?

THE COURT:

he Unless withdraws them before that date, we're gonna have a hearing on those matters on that date, okay? I am ordering that you provide his

home address. It will be placed under seal. Mr. Bauman, we've sort of ignored you. My apologies.

My apologies. Do you have anything you wish

MR. BAUMAN:

quite all right, Your Honor.

THE COURT:

to say?

MR. BAUMAN:

Just absorbing it all in.

THE COURT:

Now, Okay. having said all that, We do have one other matter that needs to be addressed. I granted, back on

August 13th of this year, I had granted pauper I granted pauper status to Mr. King. Now, this came after he had made multiple attempts at achieving pauper status and I had denied them each time simply because there was no affidavit attached, there or whatever. Things weren't filed in the record. Anyhow, it was just procedural stuff and

quite

frankly, I wasn't denying it based on any of the information he placed in it, it just wasn't procedurally

correct SO We would deny it, send it back and say hey you need, one two three, or whatever it was.

In August, I received his pauper status request and, uh, and it looked procedurally right so I signed off on it and I

granted
status. pauper
Okay?

Subsequent to that, he hired counsel and in fact, in one of his hearings subsequent to me granting pauper status, he advised that he spent twelve thousand dollars ($12,000.00) on lawyers in this past year, okay? Information which he did not place in the pauper affidavit and which would

have been a

information a very relevant piece of

to me in granting pauper

status because if you've got twelve (12)

grand to hire lawyers, then you can pay

the court costs in City Court. Having

recalled that and after he made that

statement, I actually went back and took a look at the pauper status, uh, pauper request and I noticed something else that, uh, I am rather embarrassed that I missed, but I just don't know if I didn't remember the wife's name or whatever, or if I really knew, but, uh, and I'll provide this for everyone in the courtroom to look at. But, as you well know, any pauper affidavit must be accompanied by a third party affidavit by someone who knew he person, knows their situation and can say,

uh, I and know Lois she's, uh, hadn't worked in ten (10) years, and whatever. And I can say speak some truth to her assertion that she is a pauper. And of course, a third party would be, in my case, Mr. Bauman or you would be a third party to me. You're not married to me. You're

not my first cousin or you know, whatever, my dad or etcetera. However, in reviewing this, I realized that the third party affidavit was executed by Mr. King's wife, Shunte King. Okay? Now, uh, I did not realize at the time that was his wife, uh, and when everything's written in it's kind of open to some

cursive,

interpretation but going back and taking a good look at it, I realized, uh, that she

That did that.

would of course be improper and would make the affidavit null and void because it's not executed by a third party. It's executed by his wife. She's not a third party. Not only is she not a third party, she's such a close party

that Louisiana law would require that we couldn't even make her testify against him because of spousal privilege. The very nature of being a third party would mean no privilege there. So,

this Court will sua sponte rescind the order for pauper. It is not procedurally correct. It is not properly done. It is therefore not a legal filing and So the court is gonna order

that the pauper status be rescinded retroactive to the date of granting and the court would caution everyone to be mindful in any statements made in any, uh, future such motions, uh, because a statement of having twelve thousand dollars ($12,000.00) to spend on lawyers means you got a couple hundred dollars to spend on court costs. Anyhow, all right

MR. SCHRUMPF:

Judge, I ... I ... as the since I am their attorney, at this point I have to say that this Court has no jurisdiction to take the action you just ordered under Code of Civil Procedure Article 208a, there are certain things that the court can do

THE COURT:

uh huh

MR. SCHRUMPF:

after the appeal has been granted.

THE COURT:

Right.

MR. SCHRUMPF:

And that's not one of them.

THE COURT:

But you your problem here sir is that your client continues in the behavior. Your client can't keep invoking the jurisdiction of this court and then

claim that this court has no jurisdiction.

There has to be consequences for continuing to involve. So what I suggest is, shall I speak bluntly? Get a grip on your client and tell him to stop. Okay? Because as long as he's gonna file things here, this court's gonna have jurisdiction. Okay? You don't get to say, oh, I'm appealing it and therefore I can just do and say whatever I want to this court. I make whatever allegations, assertions I want regarding this court. I

can in file things the record. I can continue to obey court orders and if you think that the Code of Civil Procedure in any way, shape OF form allows for this kind of behavior and then you get to hide behind, I filed an appeal, I beg to differ.

Okay. That is not what it meant. I'm not able to make

rulings generally. any

I

go back and redo

and redo things. I can't

can't go back

undo things. I can't

there's all sorts

of things I shouldn't be able to do except

he keeps addressing the court and filing

pleadings and his wife continues with her

contemptuous behavior. Okay? And SO,

I

don't like doing this. I don't know what

the right thing is to truly do but I know

that this behavior's gonna stop one way or

the other, period. We're

period. We're not gonna have

this. Anything Mr. Bauman?

MR. BAUMAN:

No Your Honor.

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THE COURT:

17

All right. Mr. Schrumpf

MR. SCHRUMPF:

I will see

THE COURT:

Do we have an envelope Miss

Somebody get me an envelope. He's

Bang?

gonna put the

in address

the envelope.

It's gonna be sealed and tendered to the

court. This

information

will not be

revealed to anyone other than immediate court staff or, uh, or deputy marshals who are involved in the Long Arm Service process regarding Miss King.

MR. BAUMAN: Your Honor, I'm filing motion to enroll with the Third Circuit regarding the appeal.

THE COURT: Yes sir.

MR. SCHRUMPF:

And

and Judge, there's no jurisdiction to sign any kind of order.

And, I I went through this in Allen Parish trying to enroll in a case where someone had taken an appeal and it was denied. I couldn't even enroll in because that's not one of the things allowed.

THE COURT:

He's

he's

enrolling in

the Third Circuit I believe he just said.

MR. BAUMAN:

Yea.

THE COURT:

He's not enrolling here.

MR. SCHRUMPF:

Oh okay. In the Third Circuit?

THE COURT:

Yea. Once again, uh, your clients have made this difficult situation putting me, you and all parties in a difficult mess. And I'm stuck with trying to find

way to handle this behavior.

Give that to Mr. Schrumpf please so he may

and give him a, uh, he's got a note

pad if he can just tear a piece of paper,

write the address, put it in it. It'll be

returned to me and sealed per my order.

Mr. Pete,

if you will provide me

that,

then I'll seal it.

MR. SCHRUMPF:

Judge, you should

look at

this right now before I leave. That's the address I have in my file.

THE COURT:

This Okay.

address

incorrect address that ...

is

an

Frank

MR. SCHRUMPF:

well, that's what you're telling me. That they're not you said you tried serving them and they can't be served there. As far as I know

THE COURT:

Let me be very clear

MR. SCHRUMPF:

he lives in New Jersey.

THE COURT:

Let me

let me be very clear. I haven't tried to serve anybody. The Marshal's in Office, doing their lawful duties, has made service, attempted service at three (3) addresses provided by your client. Okay? None of those addresses are where your client actually resides, okay? Your client testified in court that he resided in New Jersey.

MR. SCHRUMPF:

Yes sir.

THE COURT:

His wife testified to that as well, all right? I, due to her statements that she was in witness protection, I did

not

information require that she provide any

on the record, okay?

okay? So, I want to make very sure very clear here,

you as an officer of the court are telling me that you do not know or have an address where they live in New Jersey?

MR. SCHRUMPF:

do.

not

have their

New

Jersey address, correct.

THE COURT:

is Okay. All you have

this

one?

MR. SCHRUMPF:

This is his address

in my

file but I used

all

communications

have been by the email address

address which

I

provided to

THE COURT:

well that's how they're

that's how they're cooperating with this court. I'm just unaware of any way to do service via email, okay? This is being placed into

into the record.

It's not being sealed because it's the address

that's already in the record. I'll see you on the

15th Mr. Schrumpf.

MR. SCHRUMPF:

Okay.

MR. BAUMAN:

Thank you, Your Honor.

THE COURT:

Thank you gentlemen. Court's adjourned.

END OF HEARING

* * *

STATE OF LOUISIANA

PARISH OF CALCASIEU :

REPORTER'S PAGE

I, **Karey** J. **Bang, Certified Digital Reporter (1072019)** for the Lake Charles City Court in and for State of Louisiana, do hereby state on the Record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) and/or ellipsis (...) have been used to indicate pauses, changes in thought, and/or talk-overs; that same is the proper method for a Court Reporter's transcription of proceeding, and that the dashes (--) and/or ellipsis (...) do

not indicate that words or phrases have been left out of this transcript.

Lake Charles, Louisiana; January 7, 2025.



Кразо вану

KAREY BANG

Certified Digital Reporter

STATE OF LOUISIANA

PARISH OF CALCASIEU

REPORTER'S CERTIFICATE

I, Karey J. Bang, Certified Digital Reporter (1072019) for the Lake Charles City Court in and for State of Louisiana, do hereby certify that this testimony was reported to Shelia Hasty in the digital reporting method, was prepared and transcribed by me or under my direction and supervision, and is a true and

correct transcript to the best of my ability and understanding; that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board, or by the Supreme Court of Louisiana, and that I am not related to counsel or to the parties herein, nor am I otherwise interested in the outcome of this matter.

Lake Charles, Louisiana; January 7, 2025.

KAREY J. Bang

Certified igital Reporter

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CASE MAP AND ISSUES OVERVIEW

Prepared for advocacy review – summary of reported events and filings

Property / Investigation Issues

- Stolen vehicles and alleged forged title transfers.
- Alleged forged notarizations involving vehicle and asset transfers.
- Grandfather's event center and other assets reportedly affected by forgery.
- Confidential police reports reportedly provided by John's then-minor daughter.
- Princeton Jackson reportedly found behind John's brother's house.
- Years of payments allegedly missing despite records showing mailings to the address requested by case management.

Court and Case Branches

14th JDC, Calcasieu Parish – No. 2021-2773 (King v. Colston)
family / child-support disputes

↓

Lake Charles City Court – No. 23-1206 (King v. Colston)
related city-court dispute; alleged contempt issues involving Shunte King

↓

Lake Charles City Court – No. 23-2124 (King v. Amos / Hartford)
stolen vehicle / notarization dispute

↓

14th JDC – No. 24-5624
later criminal / warrant matter challenged as retaliatory

↓

U.S. District Court, W.D. Louisiana – No. 2:25-cv-01759
federal civil-rights action

Reported Procedural Concerns

- Motions allegedly blocked or not reaching the judge.
- Ineffective or disputed service / notice.
- Disputed judgments or altered orders alleged.
- Denial of Zoom access and ADA accommodations.
- Threats, retaliation, and false contempt allegations.
- Docket confusion and switched or misdirected proceedings alleged.
- Missing payment credits contributing to arrears disputes.

Key Theme

The reported pattern is that property-crime complaints and related advocacy were followed by overlapping court actions, disputed service, access barriers, and escalating contempt or warrant exposure.

This visual summarizes allegations and reported events from case materials provided by the parties; dates, assignments, and underlying facts should be verified against certified records.

CASE MAP AND ISSUES OVERVIEW

Prepared for advocacy review – summary of reported events and filings

Property / Investigation Issues

- Stolen vehicles and alleged forged title transfers.
- Alleged forged notarizations involving vehicle and asset transfers.
- Grandfather's event center and other assets reportedly affected by forgery.
- Confidential police reports reportedly provided by John's then-minor daughter.
- Princeton Jackson reportedly found behind John's brother's house.
- Years of payments allegedly missing despite records showing mailings to the address requested by case management.

Court and Case Branches

14th JDC, Calcasieu Parish – No. 2021-2773 (King v. Colston)
family / child-support disputes

↓

Lake Charles City Court – No. 23-1206 (King v. Colston)
related city-court dispute; alleged contempt issues involving Shunte King

↓

Lake Charles City Court – No. 23-2124 (King v. Amos / Hartford)
stolen vehicle / notarization dispute

↓

14th JDC – No. 24-5624
later criminal / warrant matter challenged as retaliatory

↓

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SELECTED CHRONOLOGY OF REPORTED EVENTS

Focused milestones only – not a full timeline

Summer 2022

Early warnings, property concerns, and payment disputes

→ Reported threats escalated while John raised concerns about stolen vehicles, asset forgery, confidential police information, and missing payment credits.

↓

May–June 2023

Attorney-enrollment and service disputes

→ Disputes arose over Lakoshia Roberts' enrollment, notice, and whether opposing filings had merit or had been properly served.

↓

Nov–Dec 2024

Amos litigation, appeal activity, and contempt-related escalation

→ The stolen-vehicle / notarization case proceeded while John challenged fairness, counsel issues, costs, and post-appeal actions.

↓

Jan–Feb 2026

Contempt / access problems and warrant-related issues

→ Reported denial of remote participation, disability accommodations, hearing access, and later warrant exposure in contested proceedings.

↓

April 2026

Appellate-record and transcript access problems

→ John reports difficulty obtaining conformed copies, usable exhibits, and reporter information needed for supervisory-writ review.

↓

Sept 2026 – Jan 2027

Trial-setting and discovery disputes continue

→ Later notices and deadlines were challenged as unclear, ineffective, or premature while exceptions and service defects remained disputed.

Recurring themes

- property complaints followed by court escalation
- disputed notice and service
- disability-access barriers
- missing payment credits / arrears concerns
- repeated requests for review and corrective action

This page is a selected chronology for advocacy use and does not attempt to list every filing or event.

HARMS, MISSING FUNDS, AND EVIDENCE OVERVIEW

Summary for attorney and advocate review

Reported Harms

- loss of access to children and family disruption
- false contempt exposure and warrant-related stress
- financial harm from stolen vehicles and alleged forged transfers
- missing payment credits contributing to arrears disputes
- harassment of spouse, employers, and schools reported
- medical and disability strain during ongoing litigation

Evidence and Support

- emails with court staff and opposing counsel
- docket sheets, notices, judgments, and orders
- police reports and investigative materials
- audio recordings and witness accounts
- medical records and disability documentation
- payment records, mailing proof, and accounting documents

Questions for Reviewers

- Were service and notice legally effective?
- Did any orders differ from transcripts or circulated drafts?
- Were Zoom access and ADA accommodations improperly denied?
- Were contempt and warrant proceedings supported by proper notice and evidence?
- Can missing payments be reconstructed and credited accurately?
- Which matters belong in city court, district court, or administrative review?

Suggested Exhibit Buckets

Court Filings & Orders	Payment & Arrears Records	Police / Property Evidence	Medical / ADA Documentation
Pleadings, docket sheets, notices, judgments, and related orders.	Payment history, mailing proof, and accounting documents.	Police reports, investigative materials, and vehicle documents.	Medical records, disability documentation, and accommodation requests.

Supporting files may be organized separately in an exhibit repository or Dropbox folder.

Several items summarized here are reported events or allegations pending formal review and certification.

Gmail

True King <truekingfile@gmail.com>

King V Amos, Lake Charles City Court

11 messages

Joseph Burke <joe@sanchezburke.com> Thu, Oct 31, 2024 at 1:09 PM
To: "truekingfile@gmail.com" <truekingfile@gmail.com>
Cc: Chelsea Guillory <chelsea@sanchezburke.com>, Hannah Authement <Hannah@sanchezburke.com>

Mrs. King,

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Thank you again for contacting me, and I wish you all the best.

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Joseph Burke

Sanchez Burke, L.L.C.

1200 Ryan Street | Lake Charles, LA 70601

joe@sanchezburke.com | www.sanchezburke.com

t 337.433.4405 | *f* 337.433.4430

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Mr Burke,

We're filing continuance as there was nothing filed on the other side before today.

Again you came referred by mutual acquaintances so can we pay for a consultation to understand what is going on these sanctions and etc were just filed today for the first time.

As you can see this is an attempt to harm the case with tricks we're not asking for you to enroll we're asking for paid for advice and what the obstacle truly is with this case.

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To: Joseph Burke <joe@sanchezburke.com>
Cc: Chelsea Guillory <chelsea@sanchezburke.com>, Hannah Authement <Hannah@sanchezburke.com>

Mr Burke,
Please allow me to have a mutual friend of your wife call you on our behalf if necessary. We're not looking to be a burden we have to explain why my husband is experiencing paralysis as a result of this case and simply seeking justice from Your guidance.
Attached is motion based on medical necessity for continuance
As well as motions to quash and motions to strike.
Please permit us a consultation.

Thank You

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Contiuanceactober.pdf
368K

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To: True King <truekingfile@gmail.com>
Cc: Chelsea Guillory <chelsea@sanchezburke.com>, Hannah Authement <Hannah@sanchezburke.com>

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Sent from my iPhone

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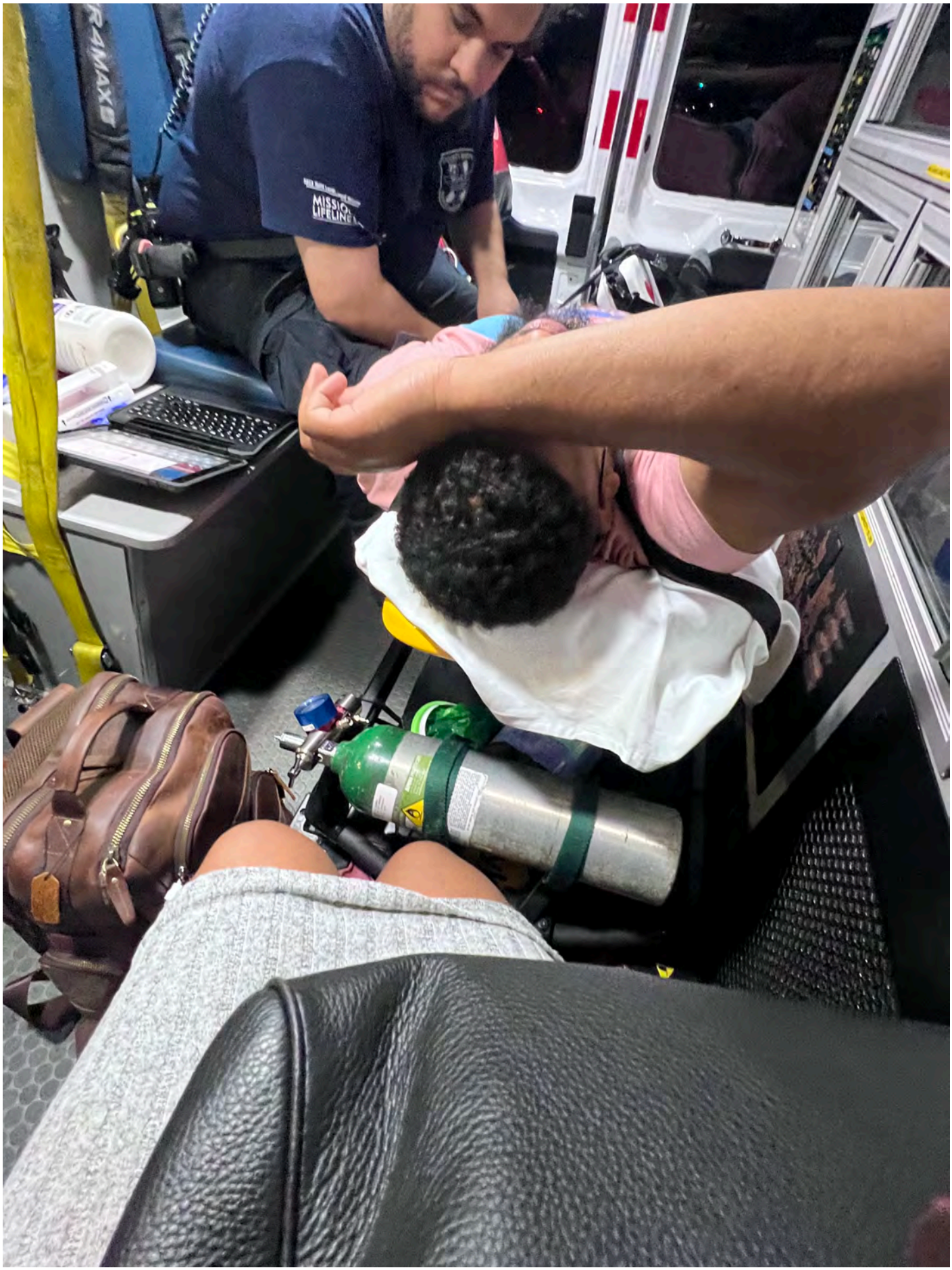
Good morning Mr Burke,

My apologies I wasn't clear that there was an attachment in the previous email I know now what was filed and I submitted a motion in time. Attached you can see I'm struggling with the medical emergency as once again we had to go emergency room last night after a week in the hospital as the seizures progressed to stroke symptoms. I'm not from lake charles but I'm in need of a consultation based on our being referred to Mrs Sanchez- Burke and I prefer the recommendation of a friend.
I understand Mrs Sanchez-Burke isn't available and I am not asking you to enroll as we have submitted a continuance and as you can see attached we're battling both partial and full paralysis from Neuro.
What is needed is a consultation as you're from Lake Charles not New Orleans and I need to discuss the scope of our needs even in limited capacity .

Please permit me to have a dignified professional conversation as I cannot shop attorneys in Lake Charles while struggling with my husbands diagnosis and work.

Please permit us this opportunity. And how to proceed as Power of Attorney in Louisiana .
Thank You
-SJK


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SURFACE





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IMG_1561.MOV
1225K

True King <truekingfile@gmail.com> Mon, Nov 4, 2024 at 9:43 AM
To: Joseph Burke <joe@sanchezburke.com>
Cc: Chelsea Guillory <chelsea@sanchezburke.com>, Hannah Authement <Hannah@sanchezburke.com>

Mr Burke,
Update. The defendants attorney is inexperienced and sloppy and the information you were given was inaccurate. There are no motions to limine or motion to not allow witnesses as you know it would have had to been filed 15 days before. The motions you mentioned were not filed on Thursday 15 days prior to trial date and I was not served. I'm required to be served 15 days prior to trial and it has to be filed 15 days before and a legal holiday was Friday which would have made the filing necessary even earlier.

I'm asking for consultation based on Motion for summary judgment as I have submitted hundreds of pages of evidence and witnesses and the defendant had hoped to file more frivolous motions to waste time. I am entitled to a summary judgment and as you can tell no trial will be happening on November 14 as I was admitted to the cancer center and hospital all in month of October.

Ms Chelsea what I need is a consultation on summary judgment and I don't need a lawyer for Nov 14.

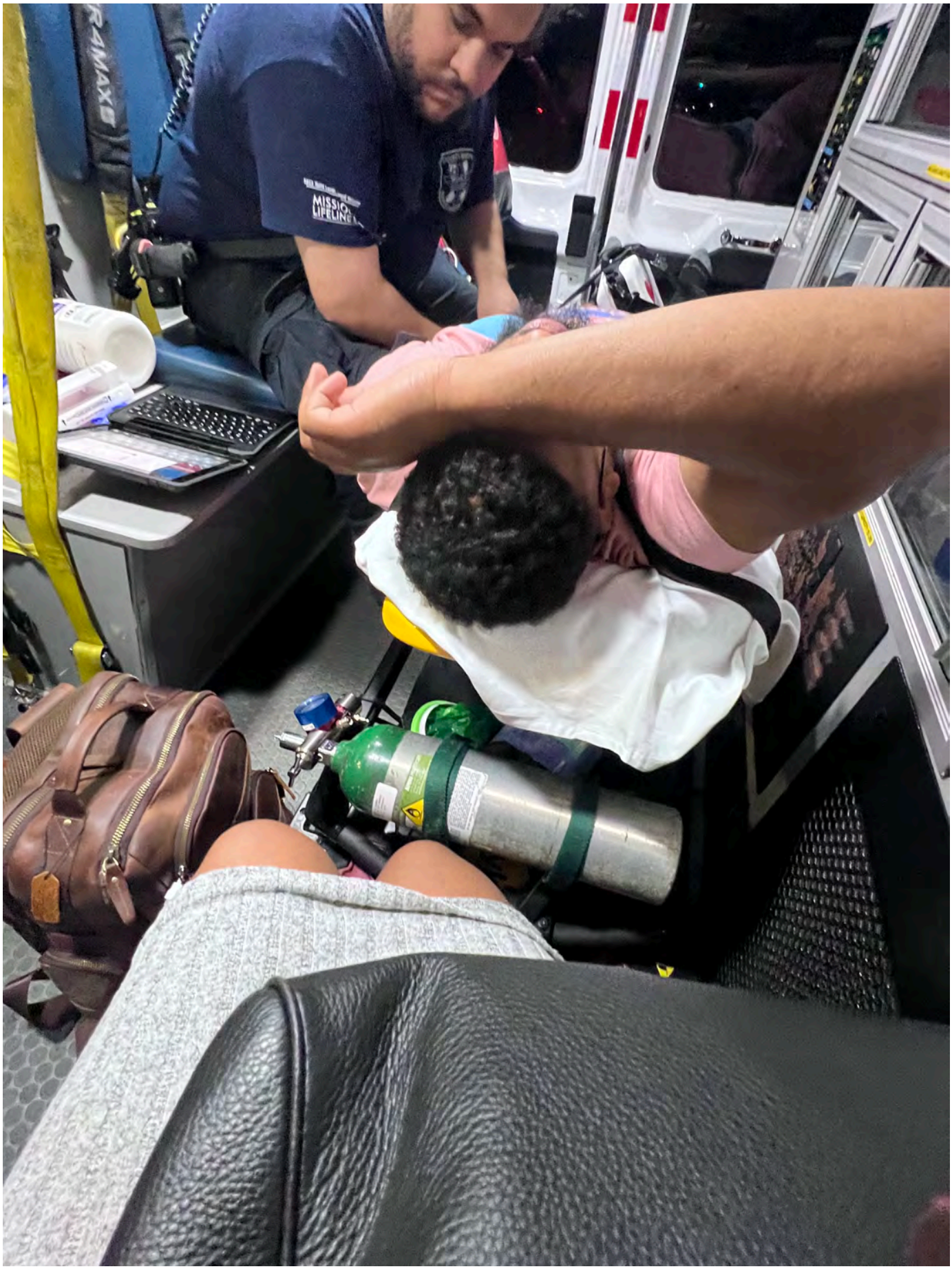
I also need a consultation for December with Mrs Sanchez -Burke about an unrelated matter.

Thank You
JK

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> Please permit us this opportunity. And how to proceed as Power of Attorney in Louisiana .
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SURFACE


MISSION
LIFELINE



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True King <truekingfile@gmail.com> Wed, Nov 6, 2024 at 5:06 PM
To: Kay Bang <kay.bang@lccitycourt.org>, KAMIE DOMINIC <kamiedominiclaw@gmail.com>

Ms Bang,

Because of Judge Richard allowing the untimely motions of Kamie Dominic to be argued on Nov 14, 2024 counsel was not able to enroll as it increased complexity and time necessary to prepare and proposed counsel was in trial all week and could not prepare.
It would also increase the fees thus indirectly resulting in miscarriage of justice as the plans were to enroll considering no new motions could be submitted despite not having entire case file . This would have permitted counsel in court even if Plaintiff had to appear via zoom.
We are now being told that because of these untimely motions being permitted for argument, plaintiffs now in restricted medical capacity must obtain new counsel or risk default judgement because of lack of due process or in the interest of justice to be paramount concern .

This is the third attorney attempt to enroll without an entire case file or was given misinformation. Please look at the date of the email.

How could the plaintiff have responded if Dominc did not provide service via email of what was filed the day before. If she had provided an electronic copy for counsel to see what was being argued prior to the legal holiday Nov 1 these matters could have gone smoothly.

The mistakes of Ms Dominc although she had six months to file and did not, is this not grounds for mistrial or continuance considering it coincides with unpredictable medical occurrence and plaintiffs fitness to stand trial ?

Asking once again to exercise disability protections put in place or dismiss Dominics untimely motions as these are unfair challenges to the legal process. She had just as much time to file as King had to obtain counsel and the intention was motion for summary judgement which was not due until today. Now that cannot be achieved as the motions she filed have to be argued prior to any trial.

Please advise as soon as possible so that we know what to provide to NJ court for incapacitation injunction as the risk for stroke while spinal cord is exposed is almost guaranteed with cabin pressure and landing and the state of NJ will need to attempt to block the order for the welfare of the patient.

Please advise if the order is being pushed because of not obtaining legal counsel or Judge Richard simply wont approve medical disability continuance so we know which grounds for injunction specifically were presenting evidence for ? As all motions are due today or Judge Richard can impose sanctions on the patient in question.

Please advise as legal counsel can respond tomorrow after court or Friday as emergency counsel had to be paid and obtained to advise next steps.
As of now counsel has advised gain clarity as they are currently in a hearing.

Please advise so all parties know which direction to go in and yes we have receipt that legal counsel had to be paid today as a result of the email sent by Ms Bang. An emergency enrollment was necessary.

All motions and subpoenas are due today so this is time sensitive so a response in writing to provide to the lawyer here would be of great benefit.
Thank You

Please Advise

---------- Forwarded message ---------
From: Joseph Burke <joe@sanchezburke.com>
Date: Thu, Oct 31, 2024 at 1:09 PM
Subject: King V Amos, Lake Charles City Court
To: truekingfile@gmail.com <truekingfile@gmail.com>
Cc: Chelsea Guillory <chelsea@sanchezburke.com>, Hannah Authement <Hannah@sanchezburke.com>

Mrs. King,

Thank you for speaking with me yesterday and sending me copies of various documents and pleadings relating to the above referenced city court law suit. Having reviewed the materials and the history of the case, I cannot accept representation of you and your husband at this time. Please be aware that I am not your attorney, I do not represent you in the above referenced suit or any other matters, and that I am taking no steps on your behalf.

According to the city court's clerk, your case is set for hearing on motions in limine, requests for sanctions and trial, all on November 14, 2024. I advise that you find another attorney to represent you as quickly as possible, and certainly before the November 14 hearing and trial.

Thank you again for contacting me, and I wish you all the best.

Joe

Joseph Burke

Sanchez Burke, L.L.C.

1200 Ryan Street | Lake Charles, LA 70601

joe@sanchezburke.com | www.sanchezburke.com

t 337.433.4405 | f 337.433.4430

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documents, files or e-mail messages attached to it, may contain confidential information that is attorney work product or legally privileged. The information herein may also be protected by the Electronic Communications Privacy Act, 18 U.S.C.A. 2510-2521. The information contained in this message and any file transmitted with it is transmitted in this form based on a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. If you are not the intended recipient, or the person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender at 337.433.4405 immediately and destroy the original transmission and its attachments without reading them.

True King <truekingfile@gmail.com> Fri, May 8, 2026 at 8:19 AM
To: Joseph Burke <joe@sanchezburke.com>

Read the attached evidence in its entirety . Judge richard , Renee amos the stolen cars, drugs are all attached.

He had Jarvis Reynaud locked up by Princeton Jackson to cover up the fact that if you inquire about the notary name on all the car titles you will find Renee amos,

Even when we tried to hire you you yourself were warned Judge richard was gonna try turn it into a criminal case. He's being investigated by judiciary commission and set to appear before Supreme Court for his crimes.

All the evidence is here and we have more video and audio,

He's crooked, he covered up a drug and auto theft ring cause he's cashing out from it,

Look into Renee amos and her tie to the stolen cars of Jarvis Renault who was recently set up by Princeton Jackson in March 2026 . They even denied the murder happened December 14, 2026 after we warned on record we were being threatened for our life,

Find attached and please someone let the public know before anyone else is hurt
https://www.dropbox.com/scl/fo/6wfw5bgjxxyh566mfwpuk/AHMl3PUAqA9BXKf5m-uefj0?rlkey=q576w5y39hezhqb2p7x61f5hs&st=s5shid9v&dl=0

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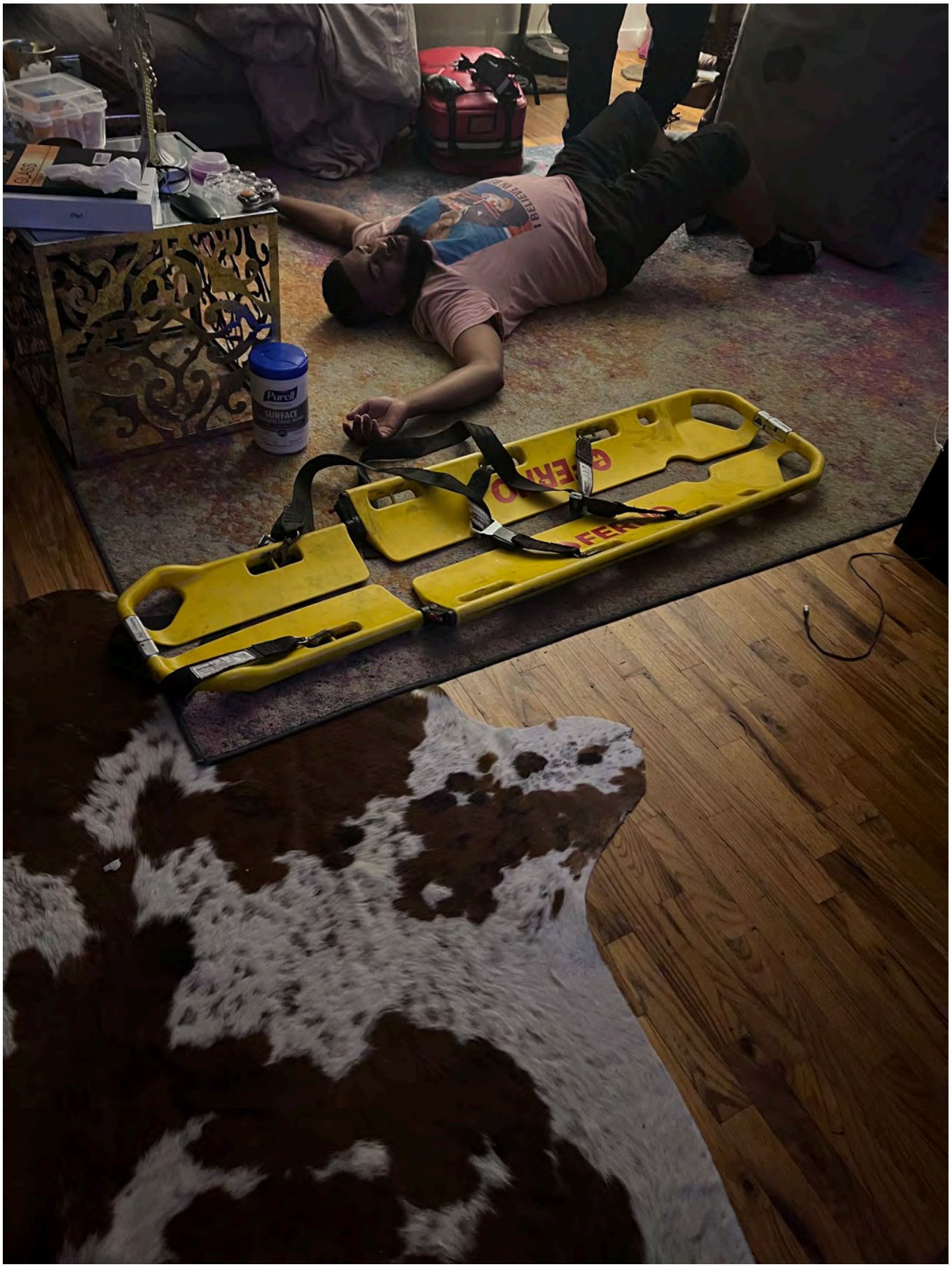
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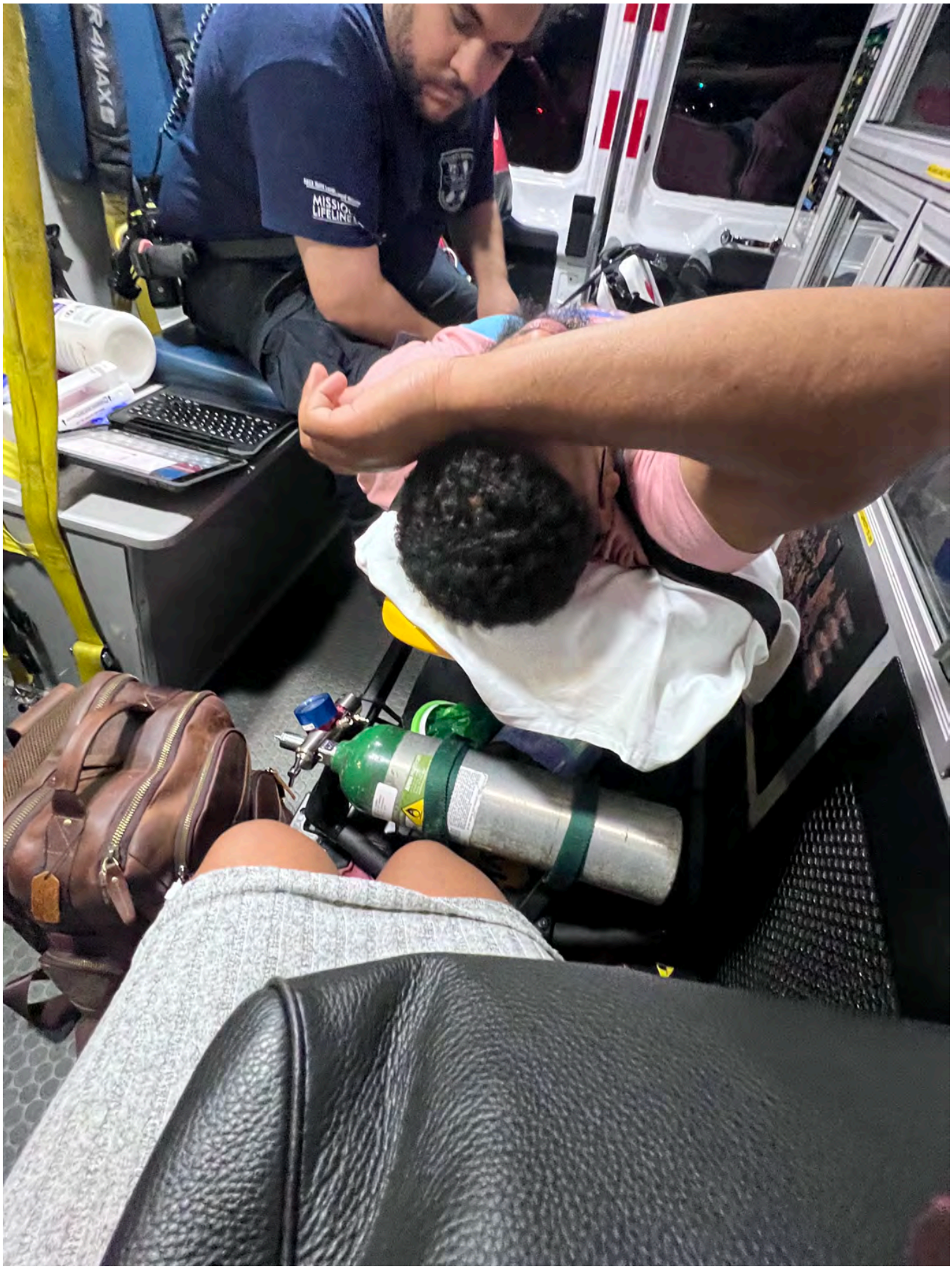
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Purell





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True King <truekingfile@gmail.com> Fri, May 8, 2026 at 8:45 AM
To: Joseph Burke <joe@sanchezburke.com>

Here is the investigation proving he's under investigation.

On January 28, 2026 he was notified by Supreme Court, and on Feb 6 2026 he had an illegal warrant issued for my wife's arrest after threats have been made to kill her to cover all of this up, a homicide occurred at her fathers house two weeks after leaving judge richard court room.

A man was killed by my sister in law in my father in law living room believed to be coming after my wife two weeks after we begged Ron richard for a protective order and to seal the records because the notary was linked to dangerous criminals.

We even tried to hire you and when you tried to enroll for our case you encountered resistance,

LOOK UP JARVIS REYNAULD, Officer Renee amos,Princeton Jackson, detective Hoover who had been let go by Jennings police in the past and Ron Richard represented Hoover in the past for being fired from Jennings police force 11 years ago.

Western division circuit court case number
CASE # 25CV 1759
Impersonation case #
CASE # 24-118583 IMPERSONATION was shut down by Ron richard because it would reveal Princeton Jackson appeared as my husband

Lake Charles case number
CASE # 2021-00123665
life insurance case number 2021-00147277

Ross Murray ADA recording threatening us because of pressure from Ron Richard he's the judge mentioned on the recording that said he would make us come across state lines and charge us with false charges.
Link below.
https://drive.google.com/file/d/1eK-0d4k0HoEw5_vuaHoLwyS9Ez4Cuv9o/view?usp=drivesdk

Go look up warrant #

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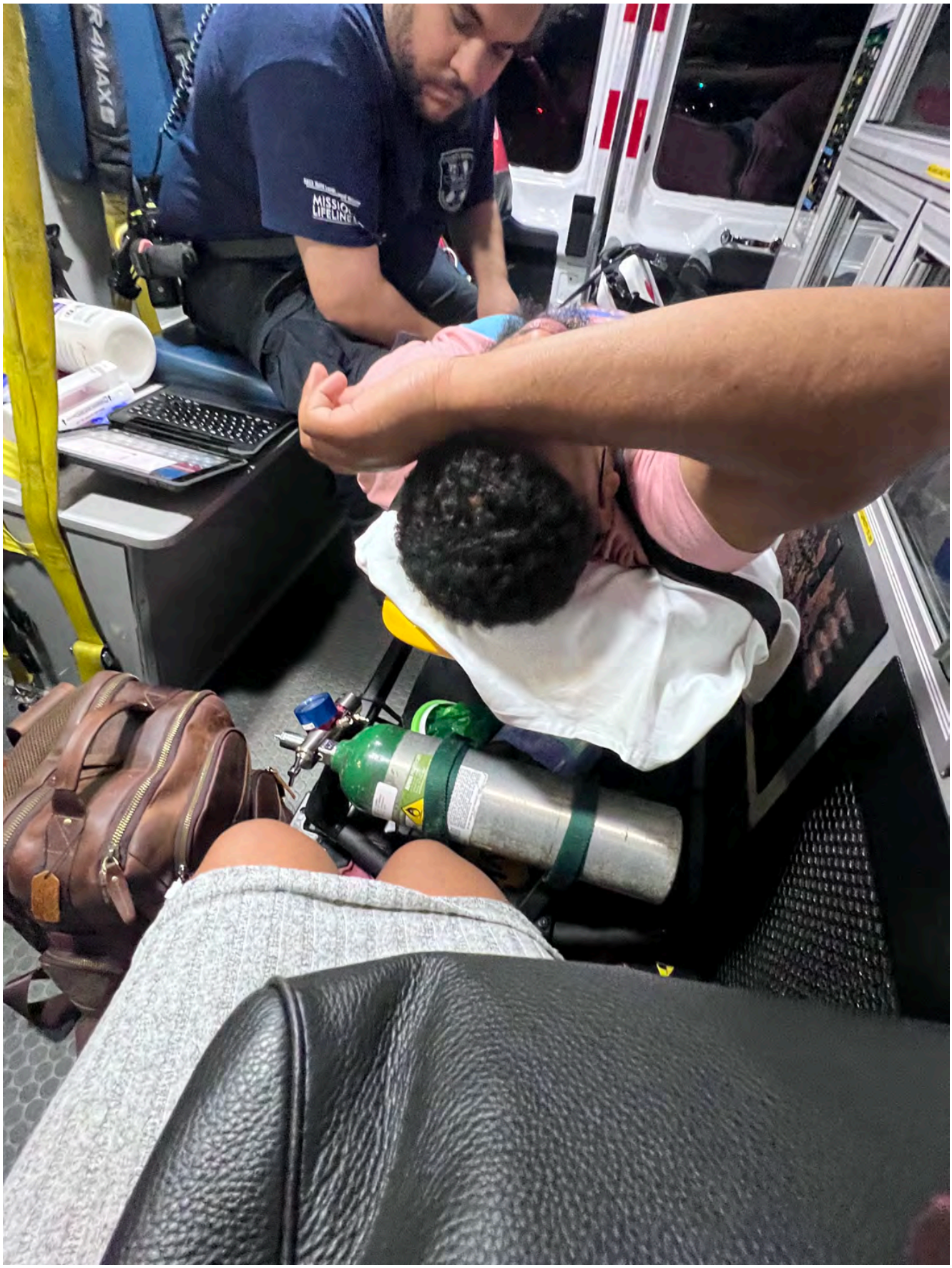
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Purell
SURFACE


MISSION
LIFELINE



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Here is the link to the rest….

We feel strongly that the homocide was an attempt to kill my wife stopped by her sister.

The warrant attached is unlawful retaliation and an attempt to extradite my wife and murder her accidentally in police custody to cover the trail from
Renee amos auto thefts, the drugs, the stolen car titles linked to Jarvis Raynaud. Princeton Jackson and Judge richard worked together on this and he was caught in the back yard of my brothers house off duty.

Random threats sent to my mother's house anonymously.

And yes recently 8 days after Supreme Court contacted Ron richard on January 28 2026 for investigation into the drugs and stolen cars and the notary he refuses to allow to be investigated Ron richard asked his friend detective Hoover out of the blue to issue an extradition warrant made it criminal because judge richard on the transcripts attached let my husband have a seizure on his back with a severed spinal chord. He was in so much pain he could barely breath

View attached below…
The notice sent to judge fazzio and look up every case referenced .

Judge richard was aware Jarvis Reynaud and Renee Amos's were committing felonies while Princeton Jackson turned his head and there was money split many years even properties were taken,
If someone looks into Renee amos and all the stolen assets she's notarized you will find a connection between she, judge richard and the criminals who eventually get jailed.

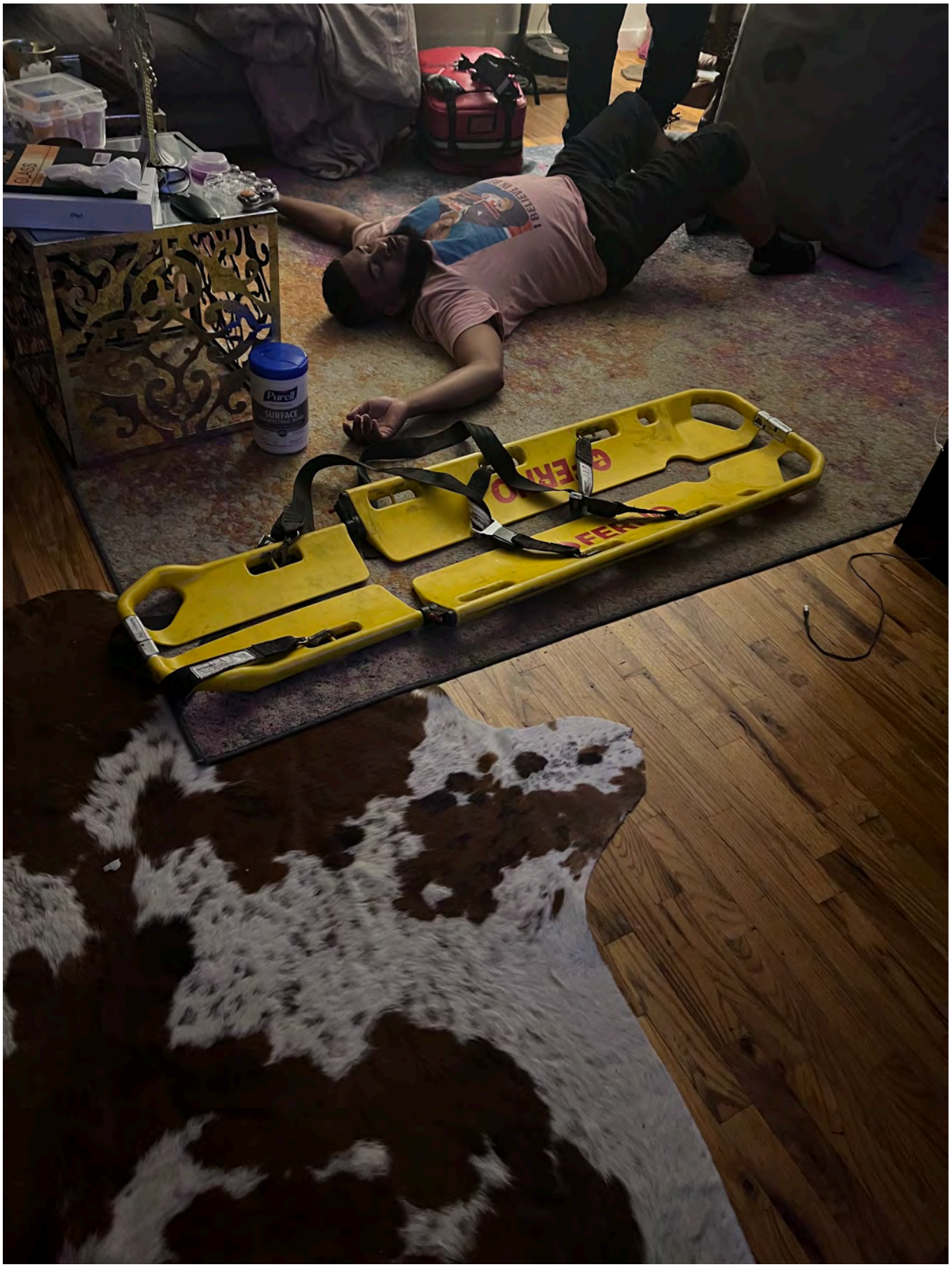
He's not in the black community cause he's loved he's there because he commits crimes for profit and protects them from the bench.
https://docs.google.com/document/d/1A5MIDpPixRei1XF9pbRVro6F07kuWc_FD6SQU8pUPX8/edit?usp=drivesdk

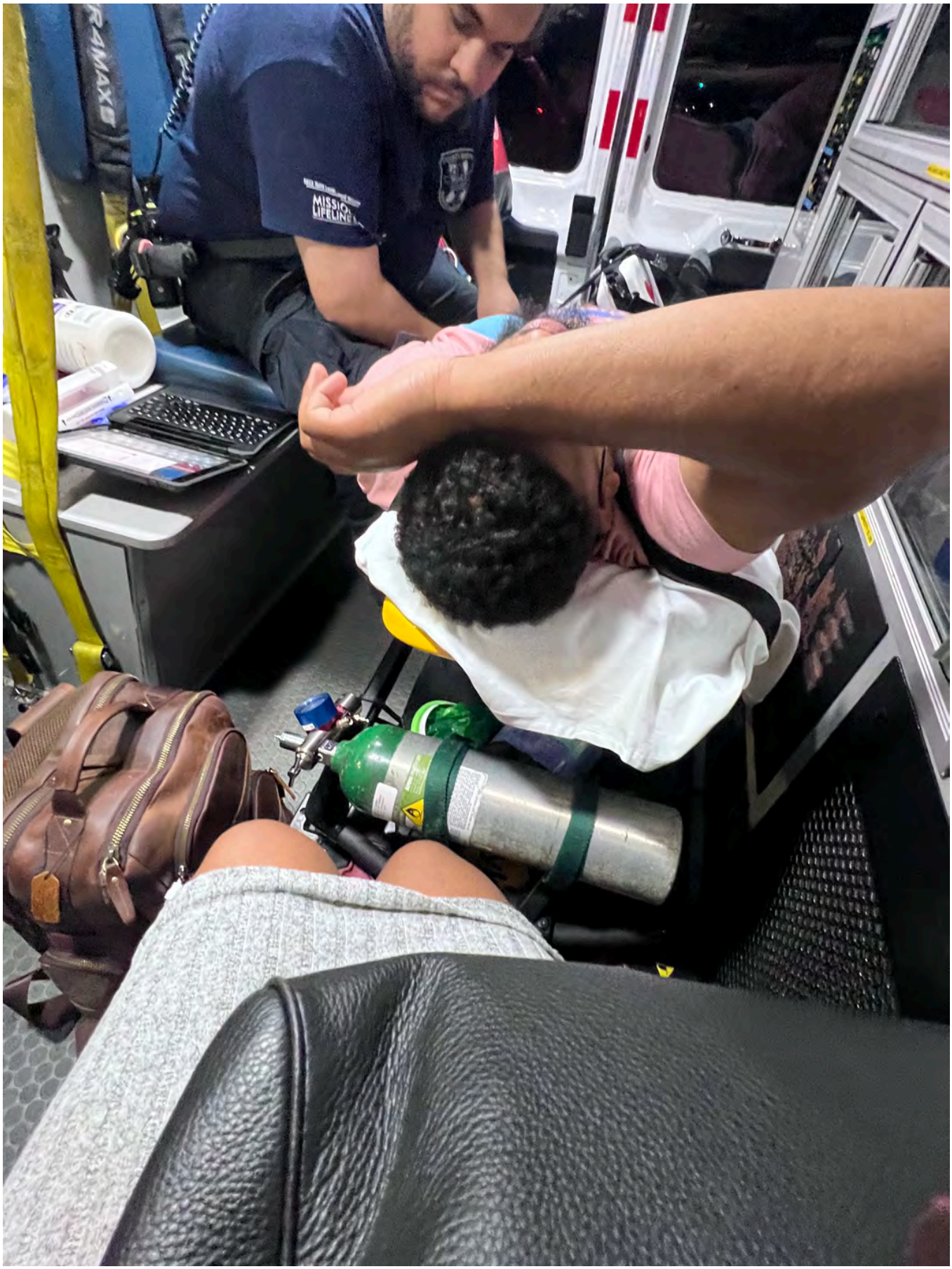
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To date there has been no objection received on behalf of John King. Counsel to date has received no articulated objection and attribute the delay to additional harassment by Mr. King against Ms. Colston.

On June 6, 2024, Mr. Serrett indicated he had no objection to the judgment presented after receiving the transcript.

I have allowed at least five (5) working days before presentation to the Court. Certified this 11th day of June, 2024.

Orelia R. Lawdins-Trent

Orelia Lawdins-Trent

PLEASE SERVE:

The parties, through attorneys

JIMMY TRAHAN, EdD, MA, LPC
1924 Southwood Drive
Lake Charles, LA 70605

EMERGENCY COMPLAINT AND REQUEST FOR PRESERVATION OF COURT RECORDS — H. LYNN JONES II, CALCASIEU PARISH CLERK OF COURT — DOCKET NO. 2021-2773

True King <truekingfile@gmail.com> Mon, Oct 12, 2026 at 9:23 AM
To: Michelle Jordan <mjordan@calcasieuclerk.gov>
Cc: "Michelle Pitsch (mpitsch@14jdc.org)" <mpitsch@14jdc.org>, Lynn Jones <lynnjones@calcasieuclerk.gov>, constituentservices@ag.louisiana.gov
Bcc: constituentservices@ag.louisiana.gov, tphillips@lla.la.gov, mwag@lla.la.gov, info@lla.la.gov

Notice of internal forgery of Judges signatures, paid unethical behavior within clerks department they are being paid to switch judgments and forge judges signatures along with the clerks. - This has landed many innocent people in jail and one of your employees was bullied and fired and provided me with evidence.

Good Morning Ms Jordan,
I'm writing to you in fear for my life and safety. I have proof evidence and witnesses that are your employees that forgeries of court orders have been occurring and being pushed through by specific employees in your clerk of court department.
In addition they work alongside paralegals like Rhonda who create court orders or schedule trials without merit to deny due process and circumvent the clerks office and those court orders do NOT have the clerks signature and or seal. Similar to the one Rhonda sent out last week the only difference is you guys CAUGHT THEM IN THE ACT of denying due process, without the judge or clerk even knowing.

These employees are being paid cash to do this at the requests of certain attorneys and Lawdins-Trent is a repeat offender. If you need proof look to the March 2024 court order she submitted with Rhonda and faxed it directly to one of your employees she pays. She switched the front pages of the court order and made them completely new court order substituting the page with Judge Reeds signature on it. Rhonda was paid cash to look the other way because they stole over $24000 that day. Look at the attached from Dustan Abshire he is calling it out that she made this judgement out of thin air and it's nothing like the transcript. The clerk was also told since only one party signed it it must be turned in with a transcript. We have a copy of the correspondence where a member of the clerks staff turned their head and received a fax filing and was paid to push the forged court order through.
(Attached is Dustan Abshire disputing it) I will also attach the real court order that Judge Redd signed.

Secondly look to Sep 6 2023 on the chronology, that motion was never served and no certificate of service is attached. The hearing officer Tom Shea and Judge Redd both admonished Lawdins and told her her motion was never served and time had prescribed. She paid Rhonda several times over the course of 4 years to try to reset it and Rhonda convinced your clerks to charge me 4 years of filing fees totaling tens of thousands to basically submit same motion over and over motions that you can see weren't ever presented to Judge Redd and he has no knowledge of the motions. From May 2023 -February 2024 all of those motions were held and on one occasion it took 6 months for Judge Redd to even receive an order Rhonda held it to give Lawdins Trent a trial advantage.

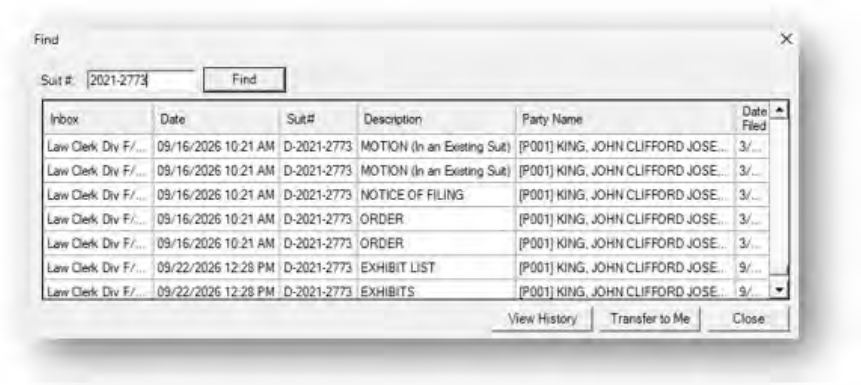
Please look into the enrolling of Lakoshia Roberts and notice she and Lawdins Trent are conspiring to blame things on my wife and get her thrown out of law school. They are good friends and sorority sisters and I sent an email to Rhonda the Thursday before the May 30 2026 hearing that something wasn't right and I didn't want to allow Roberts to enroll because she seemed to be a stooge for Lawdins. I was provided proof by a clerk employee that Lakoshia Roberts never enrolled on the record until AFTER she had falsified representation of me in court. She and Rhonda had planned not to let me into the hearing to tell the judge I skipped to get a default judgement. You can review the transcript the law requires Roberts to enroll with all parties present in open court OR she could file with clerk to enroll. Your clerk employee provided timestamped evidence that Lakoshia Roberts enrolled AFTER the hearing was held and gave away custody of my children and bullied me. I would have to pay a friend $10,000,00 to represent me to get out of the mess and I refused to pay it.
I'm not the only person they have done this way. There is a pay to play system they use to run over pro se litigants and Lawdins has went as far as to have my mother and former attorney threatened.

I have evidence of which employees in the clerks office are forging and forcing court orders through and which Judges staff are working along with them.

I'm coming to you first before putting it on federal website.

On Tue, Oct 6, 2026 at 11:03 AM Michelle Jordan <mjordan@calcasieuclerk.gov> wrote:

> Mr. King,
>
> The following information is provided by our Civil Processing Supervisors:
>
> *"The Clerk of Court is not holding anything in #2021-2773 for either party, and we are upholding the pauper status for Mr. King.*
>
> *When doing a quick search for any held pleadings, it appears that this case has an AD HOC judge that is handled differently than the normal process, which takes a longer time for a live signature.*
>
> *Below is a screen shot of the internal tracking showing that all documents in question are currently with the Law Clerk/Div F:*



Mr. King's email noted that he contacted Div A office, who are not over his case.

Ad Hoc Judge H. Ward Fontenot is the judge over his case.

We believe that believe that Div A misinterpreted the internal screen, in informing him it was being held for costs.

Mr. King's pleadings are not being held by the Clerk of Court office. It is at the Judges office waiting the Ad Hoc Judge's live signature.

Again, the Clerk's office is honoring his pauper status in the listed case."

Calcasieu Parish Clerk of Court
Phone: 337-437-3550
Web: www.calcasieuclerk.gov
1000 Ryan Street, Rm 5 (70601) Physical
P.O. Box 1030 (70602) Mailing
Lake Charles, LA

From: True King <truekingfile@gmail.com>
Sent: Monday, October 5, 2026 3:18 PM
Subject: NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ

You don't often get email from truekingfile@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the **Calcasieu Parish Clerk of Court's Office**. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch, sgould@14jdcfjc.org

[ ]

October 5, 2026

To: Louisiana Legislative Auditor – Investigations Division
CC: Louisiana Department of Justice / Attorney General – Constituent Services and Special Investigations
Re: URGENT REQUEST FOR IMMEDIATE INTERVENTION AND INDEPENDENT REVIEW – CALCASIEU PARISH CLERK OF COURT – KING v. COLSTON, 14th JDC No. 2021-2773

Dear Sir or Madam:

I respectfully submit the enclosed materials and request **immediate independent intervention and review** concerning the handling of my filings by the Calcasieu Parish Clerk of Court in **King v. Colston, Fourteenth Judicial District Court, Docket No. 2021-2773, Division A**.

On September 22, 2026, I submitted a verified motion expressly directing the Clerk to file the pleading into the record and present it to the Honorable W. Mitchell Redd, or the properly assigned or ad hoc judge, for judicial consideration. King Motion 2773 That filing requested, among other relief, identification of unresolved motions and Rules to Show Cause, suspension or extension of discovery deadlines, clarification of the issues remaining for trial, and preservation of state and federal rights. King Motion 2773

On October 5, 2026, Judge Redd's office advised me in writing that the Clerk's records showed my documents were **"being held for costs" and had not been sent to the Judge's office**. The effect is that the Clerk's administrative handling is preventing the assigned judge from even receiving and considering a motion that specifically asks the Court to address unresolved judicial matters.

This is especially concerning because the September 22 filing expressly preserved objections involving **unresolved motions, the pending Rule to Show Cause, due process, discovery, attorney fees, costs, appellate remedies, and federal remedies**. King Motion 2773 The filing also asks the Court to determine the status of an unresolved Rule to Show Cause and other pending matters before the parties are required to incur additional discovery and litigation expense. King Motion 2773

The enclosed records further reflect that Orders to Show Cause concerning **Orelia Lawdins** and **Charmaine Colston** were previously issued and set for hearing. My present request is substantially directed toward obtaining judicial action on matters that have already been placed before the Court, rather than repeatedly filing duplicative pleadings merely to obtain a reset or ruling.

I contend that I am proceeding under an operative pauper privilege and that requiring advance costs as a condition to filing, docketing, routing, or transmitting an otherwise proper pleading raises serious concerns under **La. C.C.P. arts. 5181, 5184, and 5185**. I am not asking your office to decide the merits of the underlying domestic litigation. I am asking for review of whether administrative cost practices are being used in a manner that improperly obstructs access to judicial consideration.

I am also concerned because this incident does not arise in isolation. I have previously complained about substantial delays in the processing and routing of my filings, unequal treatment in scheduling and administrative access, and the handling of matters involving opposing counsel and court staff. I have related federal civil-rights litigation and have previously placed court personnel on notice of due-process, disability-access, and retaliation concerns. For that reason, the present withholding of my filing warrants an **independent review rather than review solely by the same office whose conduct is being challenged**.

I am **not asking your office to presume retaliation or intentional misconduct** from the present facts alone. I am requesting an investigation sufficient to determine:

1. why the September 22, 2026 filing was placed on a cost hold;
2. the exact amount and legal basis of the costs allegedly due;
3. whether my pauper status was ever lawfully rescinded or expired;
4. whether any traverse of pauper status was filed pursuant to La. C.C.P. art. 5184;
5. whether a contradictory hearing occurred before any change in pauper status;
6. which employee or employees placed, approved, or maintained the cost hold;
7. why the filing was not transmitted to Division A for judicial consideration;
8. whether similar filing, scheduling, and reset requests have been handled differently for opposing parties or counsel;
9. whether duplicate or repetitive costs have been assessed against pleadings addressing matters already subject to prior court orders; and
10. whether any retaliatory, discriminatory, or otherwise improper administrative conduct occurred.

Immediate intervention requested

Because discovery and pretrial deadlines continue to run while my motion has not even reached the assigned judge, I respectfully request **immediate intervention** to prevent additional prejudice.

Specifically, I ask that the appropriate oversight authority:

- contact the Calcasieu Parish Clerk of Court concerning the present filing hold;
- require preservation of all relevant records;

- request an itemized accounting of the costs allegedly supporting the hold;
- determine whether the Clerk had lawful authority to prevent the filing from being transmitted to the judge;
- ensure that the September 22 filing is promptly presented to the appropriate judicial officer;
- request that an uninvolved senior administrator handle my filings while this matter is reviewed; and
- refer any evidence of unlawful conduct, misuse of public office, retaliation, financial irregularity, or civil-rights violations to the agency with appropriate jurisdiction.

Preservation of evidence

Please also treat this correspondence as notice that the records identified in the enclosed **Notice of Anticipated Litigation and Demand for Preservation of Records** are potentially relevant evidence.

I specifically request preservation of all Clerk Connect entries, cost and fee codes, audit logs, routing records, intake records, internal emails, text or messaging records maintained on government systems, telephone logs, scheduling records, communications with parties or counsel concerning this case, records showing changes to filing status, and metadata concerning the September 22 filing and prior filing delays.

Enclosures

Enclosed for review are:

1. **Formal Notice of Objection to Holding Pauper Filings for Costs and Request for Immediate Transmittal to the Assigned Judge;**
2. **Notice of Anticipated Litigation and Demand for Preservation of Records;**
3. the September 22, 2026 Verified Motion and cover filing;
4. the October 5, 2026 correspondence confirming that the documents are being held for costs and have not been sent to Judge Redd;
5. previously issued Orders to Show Cause involving Orelia Lawdins and Charmaine Colston;
6. relevant docket and case-history materials;
7. prior appellate and pauper-status materials; and
8. supporting documentation concerning the procedural and due-process concerns described above.

My September filing expressly reserves claims arising under the **Fourteenth Amendment and 42 U.S.C. § 1983** concerning notice, opportunity to be heard, and the administration of these proceedings. King Motion 2773

I respectfully request **written acknowledgment of this complaint, identification of the office or investigator assigned to review it, and immediate notification if additional documentation is required**.

Because the underlying filing is presently being withheld from the judge while litigation deadlines continue to run, I respectfully ask that this matter be treated as **URGENT AND TIME-SENSITIVE**.

Respectfully submitted,

/s/ John C. J. King, Sr.
John C. J. King, Sr.
4459 Nelson Road, Suite 105 #2133
Lake Charles, Louisiana 70605
Telephone: **318-995-1705**
Email: **truekingfile@gmail.com**

RE: King v. Colston
14th Judicial District Court
Docket No. 2021-2773, Division A

4 attachments

Exceptions being ignored email .pdf
37K

rutgers harassment roberts.pdf
321K

Dustan Abshire objections .pdf
6985K

Filed exception ed exhibits06212023.pdf
11074K

Gmail True King <truekingfile@gmail.com>

NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ

4 messages

True King <truekingfile@gmail.com> Mon, Oct 5, 2026 at 4:17 PM
Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch <mpitsch@14jdc.org>, sgould@14jdcfjc.org

Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch, sgould@14jdcfjc.org

October 5, 2026

To: Louisiana Legislative Auditor – Investigations Division
CC: Louisiana Department of Justice / Attorney General – Constituent Services and Special Investigations
Re: URGENT REQUEST FOR IMMEDIATE INTERVENTION AND INDEPENDENT REVIEW – CALCASIEU PARISH CLERK OF COURT – KING v. COLSTON, 14th JDC No. 2021-2773

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I contend that I am proceeding under an operative pauper privilege and that requiring advance costs as a condition to filing, docketing, routing, or transmitting an otherwise proper pleading raises serious concerns under **La. C.C.P. arts. 5181, 5184, and 5185**. I am not asking your office to decide the merits of the underlying domestic litigation. I am asking for review of whether administrative cost practices are being used in a manner that improperly obstructs access to judicial consideration.

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5. whether a contradictory hearing occurred before any change in pauper status;

2 attachments

26 grade A CLERK FILING 0905 14THjdc.pdf
9801K

Gmail - King 2021-2773.pdf
249K

Michelle Jordan <mjordan@calcasieuclerk.gov> Tue, Oct 6, 2026 at 11:02 AM
To: True King <truekingfile@gmail.com>
Cc: "Michelle Pitsch (mpitsch@14jdc.org)" <mpitsch@14jdc.org>, Lynn Jones <lynnjones@calcasieuclerk.gov>

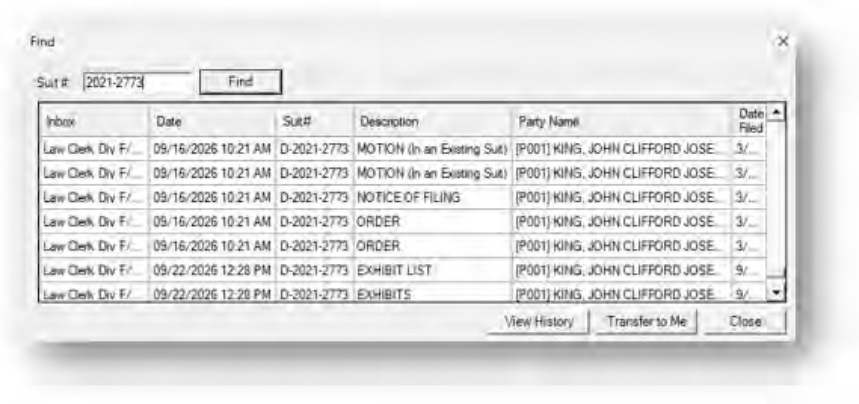
Mr. King,

The following information is provided by our Civil Processing Supervisors:

"The Clerk of Court is not holding anything in #2021-2773 for either party, and we are upholding the pauper status for Mr. King.

When doing a quick search for any held pleadings, it appears that this case has an AD HOC judge that is handled differently than the normal process, which takes a longer time for a live signature.

Below is a screen shot of the internal tracking showing that all documents in question are currently with the Law Clerk/Div F:



Mr. King's email noted that he contacted Div A office, who are not over his case.

Ad Hoc Judge H. Ward Fontenot is the judge over his case.

We believe that believe that Div A misinterpreted the internal screen, in informing him it was being held for costs.

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Again, the Clerk's office is honoring his pauper status in the listed case."

Calcasieu Parish Clerk of Court

Phone: 337-437-3550

Web: www.calcasieuclerk.gov

1000 Ryan Street, Rm 5 (70601)
Physical

P.O. Box 1030 (70602) Mailing

Lake Charles, LA

From: True King <truekingfile@gmail.com>
Sent: Monday, October 5, 2026 3:18 PM
Subject: NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ

You don't often get email from truekingfile@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the **Calcasieu Parish Clerk of Court's Office**. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[Quoted text hidden]

True King <truekingfile@gmail.com> Wed, Oct 7, 2026 at 12:19 PM
To: Michelle Jordan <mjordan@calcasieuclerk.gov>
Cc: "Michelle Pitsch (mpitsch@14jdc.org)" <mpitsch@14jdc.org>, Lynn Jones <lynnjones@calcasieuclerk.gov>, The Kings <fit4thekings@gmail.com>

Ms. Jordan,
The enclosed has been escalated.
It does not appear that Ms Rhonda intends to comply and if you dig further you will find that she has denied due process to encourage harassment through litigation and no such motion for colston even exists. It's imaginary and they made it up as retaliatory action for the federal lawsuit I have filed against 14th JDC. I repeat see attached that the hearing they scheduled for January is imaginary, there are no merits and no motion has been filed to have it and for two years they've used it as a tool for abuse and deny due process. They have held my motions for years and have always charged me duplicate fees and sometimes took 14 months plus to get a motion signed.

Please find escalated report enclosed and exhibits featuring Judge Redd refusal to comply that this case is not in his court. They are saying opposite of what your email states.
J. King

[Quoted text hidden]

---------- Forwarded message ----------
From: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
To: charmaine colston <charmaineycolston@gmail.com>, "truekingfile@gmail.com" <truekingfile@gmail.com>, Randall Serrett <randall.serrett.dcfs@la.gov>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>, Orelia Lawdins <Orelial@gallienlawdins.com>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Wed, 7 Oct 2026 15:24:01 +0000
Subject: RE: King 2021-2773

Ms. Colston, you must always include Mr. King in your communications with the Court. I have cc'd him herein. Also, if the State is still involved, Mr. Serrett must be included as well. I have also cc'd him herein.

Ms. Lawdins, are you still representing Ms. Colston? I am asking because when a party is represented by an attorney, we normally communicate only with the attorney. Please let me know.

We are in the process of determining exactly what is set and will let all parties know.

Rhonda Verzwyvelt

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: charmaine colston <charmaineycolston@gmail.com>
Sent: Wednesday, October 7, 2026 10:16 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>

Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>; Orelia Lawdins <Orelial@gallienlawdins.com>; Jodi Harlow <jharlow@14jdcfjc.org>
Subject: Re: King 2021-2773

Good morning,

I am requesting clarification regarding the upcoming January court dates.

DCFS contacted me today and advised that the NCP privately filed a 42-page modification and that the January court dates are related to that filing.

This was the first time I was made aware of the modification, as I was under the impression that the January dates were scheduled in connection with the pending contempt matter.

Could you please clarify exactly what matters are scheduled to be heard in January?

Specifically, I would like to know whether the January dates are for the NCP's modification, the contempt matter, or both.

Thank you for your clarification.

Best,

Charmaine Y. Colston

> On Sep 21, 2026, at 6:33 PM, charmaine colston <charmaineycolston@gmail.com> wrote:
>
> Thank you! Confirmed!
>
> > On Sep 21, 2026, at 2:50 PM, Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:
> >
> > All, attached is the new pre-trial order in the above matter. **Please carefully review and calendar all deadlines, as we have set a Zoom PTC prior to the trial**.
> >
> > Please also confirm receipt and that you accept notice via email in lieu of formal service. Thanks.
> >
> > *Rhonda Verzwyvelt*
> > *Paralegal to*
> > *Judge W. Mitchell Redd*
> > *14th JDC, Family Court*
> > *1000 Ryan Street, North Annex*
> > *Lake Charles, LA 70601*
> > *rverzwyvelt@14jdcfjc.org*
> > *337-437-3645*

337-437-3363, Ext. 47

Fax – 337-437-3390

<DOC092126-09212026144227.pdf>

---------- Forwarded message ----------
From: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: charmaine colston <charmaineycolston@gmail.com>, "truekingfile@gmail.com" <truekingfile@gmail.com>, Randall Serrett <Randall.Serrett.DCFS@la.gov>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Wed, 7 Oct 2026 15:47:31 +0000
Subject: Re: King 2021-2773
Ms. Verzwyvelt,
Yes, I do represent Ms. Colston and my apologies for the confusion. As she is getting conflicting information and this process is very frustrating for her. Moving forward we will not have this issue. Thank you.

Sincerely,
Orelia Lawdins-Trent , J. D., M. S.
Attorney . Certified Mediator

500 Broad Street, Suite 214
Mail to: P. O. Box 16351 (70616)
Lake Charles, LA 70601
Phone: 337.275.5124
Fax: 337.275.5125

CONFIDENTIALITY MESSAGE

Privileged:

This email contains PRIVILEGED and CONFIDENTIAL information intended only for the use of the specific individual or entity named above. If you or your employer is not the intended recipient of this e-mail or an employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any unauthorized dissemination or copying of this e-mail is strictly prohibited. If you have received this transmission in error, please immediately delete the message and contact the sender at 337-275-5124. **Please consider the environment before printing this e-mail.**

On Oct 7, 2026, at 10:24 AM, Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

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Rhonda Verzwyvelt

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: charmaine colston <charmaineycolston@gmail.com>
Sent: Wednesday, October 7, 2026 10:16 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>; Orelia Lawdins <Orelial@gallienlawdins.com>; Jodi Harlow <jharlow@14jdcfjc.org>
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> > All, attached is the new pre-trial order in the above matter. **Please carefully review and calendar all deadlines, as we have set a Zoom PTC prior to the trial**.
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> > *Rhonda Verzwyvelt*
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> > *Paralegal to*
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> > *Judge W. Mitchell Redd*
> >
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> > *1000 Ryan Street, North Annex*
> >
> > *Lake Charles, LA 70601*

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

<DOC092126-09212026144227.pdf>

---------- Forwarded message ----------
From: True King <truekingfile@gmail.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Mon, 5 Oct 2026 10:36:15 -0400
Subject: Re: King 2021-2773

Subject: Request for Clarification Regarding Pauper Status, Duplicate Costs, Outstanding Orders, and Need for Emergency Relief

Good morning,

The filings at issue are **pauper filings that should not be held for costs**, and several appear to be repetitive of matters for which relief has already been granted or remains pending.

Specifically:

1. **Order to Show Cause concerning Orelia Lawdins;**
2. **Order to Show Cause concerning Charmaine Colston;**
3. **A pending hearing concerning the exceptions, together with an existing court order that remains uncured;** and
4. **Additional orders previously granted through the ordinary judicial process and with due process afforded.**

Again, this is a **pauper proceeding in a matter that has not reached final judgment**, yet multiple and seemingly duplicative court costs have been assessed across more than ten pleadings.

The supervisory writ record has already addressed Mr. King's pauper status and determined that the status could not simply be rescinded while matters subject to the appellate proceedings remained unresolved. I therefore respectfully request clarification as to why additional filing costs continue to be assessed against pleadings submitted under pauper status and whether those assessments are consistent with the appellate ruling and the current procedural posture of the case.

It also appears that **Ms. Colston has submitted pleadings under pauper status and that her application was accepted by the Court**. If so, I respectfully request that the same procedural standards be applied consistently to both parties.

At this point, I am requesting guidance as to whether an application for a **temporary restraining order or other emergency protective relief** is necessary to preserve the status quo and prevent further prejudice while these procedural and due-process issues remain unresolved, or whether **Judge Redd will first be made aware of these outstanding matters so they may be addressed without further escalation**.

My intent is to obtain compliance with the existing orders, preserve the appellate rulings already entered, and ensure that the pending matters receive a fair and orderly resolution.

Please advise how the Court intends to proceed.

Respectfully,

John C King Sr.

On Mon, Oct 5, 2026 at 10:23 AM Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

> Please always copy Ms. Lawdins when you email the Judge's office. I have included her herein.
>
> I checked the clerk of court's website, and apparently your documents are being held for costs, and they have not yet been sent to the Judge's office.
>
> Thanks.
>
> *Rhonda Verzwyvelt*
>
> *Paralegal to*
>
> *Judge W. Mitchell Redd*
>
> *14th JDC, Family Court*
>
> *1000 Ryan Street, North Annex*
>
> *Lake Charles, LA 70601*
>
> *rverzwyvelt@14jdcfjc.org*

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: True King <truekingfile@gmail.com>
Sent: Friday, October 2, 2026 8:09 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: True King <truekingfile@gmail.com>
Subject: Re: King 2021-2773

Mrs Verzwyvelt,

I was instructed to reach out in regards to if my motions have been signed or if there needs to be an investigation into the clerks office as currently the are charges filed for intentional delays and misconduct. The motion were filed and stamped September 22, 2026 and since you're "requiring" discovery due next month an objection would need to be escalated for a federal injunction to pause proceedings if the discrimination is unethical on face value. I. E. Motions being held to prevent due process.

Research has been following the number of days it requires to get my motions signed since 2021 vs Lawdins- Trent in regards to my gender and racial discrimination claims. Before including this incident in the charges the federal clerk would like to know if Judge Redd is receiving the correspondence, or is justice being denied by the clerks office.

Please respond today so counsel can know who the charges should be directed towards the 14th JDC or the county clerks for these repeated oversights.

It appears responses happen same day when Colston calls Judge Redd office yet some of my motions were held over 109 days in one instance.

Please advise if Judge Redd is aware of this discrepancy so that the appropriate charges are assigned to the appropriate defendants.

Thank You

John King

On Tue, Sep 22, 2026 at 1:51 PM True King <truekingfile@gmail.com> wrote:

> Ms. Verzwyvelt,
>
> Please find attached the motions and related filing submitted into the record in King v. Colston, No. 2021-2773.
>
> Please also treat this correspondence and the attached pleadings as electronic service upon the parties to the extent permitted by the Court's September 21, 2026 correspondence and pretrial order, which requested confirmation of receipt and acceptance of notice by email in lieu of formal service.
>
> The Court's order specifically invited the parties to notify the Court of matters requiring immediate attention or assistance toward resolution. I am therefore requesting immediate written clarification and judicial attention to the following matters before discovery deadlines continue to run or additional pretrial and trial proceedings occur.
>
> **1. Interstate Proceedings and Existing New Jersey Orders**
>
> There are ongoing proceedings and orders involving New Jersey that concern the same parties and overlapping subject matter.
>
> The Court should determine, before proceeding further, which issues remain within Louisiana's jurisdiction and which issues have already been addressed through New Jersey interstate enforcement proceedings.
>
> I have also provided notice of New Jersey medical injunctive relief concerning participation in proceedings that have caused or aggravated serious neurological symptoms. The operative language and effect of those New Jersey orders should be reviewed before requiring further participation inconsistent with their terms.
>
> Written correspondence remains possible and is the appropriate means for addressing these matters while the jurisdictional and medical issues remain unresolved.
>
> **2. Express Relinquishment of Custody, Contact, Visitation, and Pursuit of Parental Relationship**
>
> I am expressly placing into the record that I do not seek custody, visitation, reunification, communication, or contact with the remaining minor child.
>
> As set forth more fully in the attached pleading, I am also willing to voluntarily surrender all parental rights necessary to permit a lawful adoption proceeding if Ms. Colston wishes to have her present spouse or another legally qualified person adopt the remaining minor child.
>
> I will not pursue future visitation or communication through this docket if a lawful permanent resolution can be reached.
>
> **3. John King, Jr. – Emancipation**
>
> John King, Jr. has reached age seventeen.
>
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This should be distinguished from my separate request concerning voluntary surrender for adoption of the remaining minor child.

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Jayla E. King is now eighteen years old.

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Accordingly, the Court should identify whether any presently scheduled custody, visitation, or parental-access issue purports to concern Jayla and, if so, the legal basis for continuing that issue after she reached majority.

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Jakai King is the only remaining young minor child implicated by the present family-court proceedings.

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John C. J. King, Sr.
Pro Se
Case No. 2021-2773

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ENCLOSURE: MOTIONS AND EXHIBITS FILED WITH CALCASIEU CLERK OF COURT

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>
> Please also confirm receipt and that you accept notice via email in lieu of formal service. Thanks.
>
> *Rhonda Verzwyvelt*
>
> *Paralegal to*
>
> *Judge W. Mitchell Redd*
>
> *14th JDC, Family Court*
>
> *1000 Ryan Street, North Annex*
>
> *Lake Charles, LA 70601*
>
> *rverzwyvelt@14jdcfjc.org*
>
> *337-437-3645*
>
> *337-437-3363, Ext. 47*
>
> *Fax – 337-437-3390*

---------- Forwarded message ----------
From: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
To: True King <truekingfile@gmail.com>, Orelia Lawdins-Trent <orelial@lawdinslaw.com>
Cc: Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Mon, 5 Oct 2026 14:08:06 +0000
Subject: RE: King 2021-2773

Please always copy Ms. Lawdins when you email the Judge's office. I have included her herein.

I checked the clerk of court's website, and apparently your documents are being held for costs, and they have not yet been sent to the Judge's office.

Thanks.

Rhonda Verzwyvelt

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: True King <truekingfile@gmail.com>
Sent: Friday, October 2, 2026 8:09 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: True King <truekingfile@gmail.com>
Subject: Re: King 2021-2773

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From: True King <truekingfile@gmail.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: True King <truekingfile@gmail.com>
Bcc:
Date: Fri, 2 Oct 2026 09:09:22 -0400
Subject: Re: King 2021-2773
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Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

---------- Forwarded message ----------
From: True King <truekingfile@gmail.com>
To: undisclosed-recipients:;
Cc:
Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch <mpitsch@14jdc.org>, sgould@14jdcfjc.org
Date: Mon, 5 Oct 2026 16:17:34 -0400
Subject: NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ

Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch, sgould@14jdcfjc.org

October 5, 2026

To: Louisiana Legislative Auditor – Investigations Division
CC: Louisiana Department of Justice / Attorney General – Constituent Services and Special Investigations
Re: URGENT REQUEST FOR IMMEDIATE INTERVENTION AND INDEPENDENT REVIEW – CALCASIEU PARISH CLERK OF COURT – KING v. COLSTON, 14th JDC No. 2021-2773

Dear Sir or Madam:

I respectfully submit the enclosed materials and request **immediate independent intervention and review** concerning the handling of my filings by the Calcasieu Parish Clerk of Court in **King v. Colston, Fourteenth Judicial District Court, Docket No. 2021-2773, Division A**.

On September 22, 2026, I submitted a verified motion expressly directing the Clerk to file the pleading into the record and present it to the Honorable W. Mitchell Redd, or the properly assigned or ad hoc judge, for judicial consideration. King Motion 2773 That filing requested, among other relief, identification of unresolved motions and Rules to Show Cause, suspension or extension of discovery deadlines, clarification of the issues remaining for trial, and preservation of state and federal rights. King Motion 2773

On October 5, 2026, Judge Redd's office advised me in writing that the Clerk's records showed my documents were **"being held for costs" and had not been sent to the Judge's office**. The effect is that the Clerk's administrative handling is preventing the assigned judge from even receiving and considering a motion that specifically asks the Court to address unresolved judicial matters.

This is especially concerning because the September 22 filing expressly preserved objections involving **unresolved motions, the pending Rule to Show Cause, due process, discovery, attorney fees, costs, appellate remedies, and federal remedies**. King Motion 2773 The filing also asks the Court to determine the status of an unresolved Rule to Show Cause and other pending matters before the parties are required to incur additional discovery and litigation expense. King Motion 2773

The enclosed records further reflect that Orders to Show Cause concerning **Orelia Lawdins** and **Charmaine Colston** were previously issued and set for hearing. My present request is substantially directed toward obtaining judicial action on matters that have already been placed before the Court, rather than repeatedly filing duplicative pleadings merely to obtain a reset or ruling.

I contend that I am proceeding under an operative pauper privilege and that requiring advance costs as a condition to filing, docketing, routing, or transmitting an otherwise proper pleading raises serious concerns under **La. C.C.P. arts. 5181, 5184, and 5185**. I am not asking your office to decide the merits of the underlying domestic litigation. I am asking for review of whether administrative cost practices are being used in a manner that improperly obstructs access to judicial consideration.

I am also concerned because this incident does not arise in isolation. I have previously complained about substantial delays in the processing and routing of my filings, unequal treatment in scheduling and administrative access, and the handling of matters involving opposing counsel and court staff. I have related federal civil-rights litigation and have previously placed court personnel on notice of due-process, disability-access, and retaliation concerns. For that reason, the present withholding of my filing warrants an **independent review rather than review solely by the same office whose conduct is being challenged**.

I am **not asking your office to presume retaliation or intentional misconduct** from the present facts alone. I am requesting an investigation sufficient to determine:

1. why the September 22, 2026 filing was placed on a cost hold;
2. the exact amount and legal basis of the costs allegedly due;
3. whether my pauper status was ever lawfully rescinded or expired;
4. whether any traverse of pauper status was filed pursuant to La. C.C.P. art. 5184;
5. whether a contradictory hearing occurred before any change in pauper status;

...

[Message clipped] View entire message

9 attachments

King_Request_Immediate_Supervisory_Intervention_October_7_2026.pdf
89K

King 2021-2773 (5).eml
41K

King 2021-2773 (4).eml
43K

King 2021-2773 (3).eml
43K

King 2021-2773 (2).eml
68K

King 2021-2773 (1).eml
29K

26 grade A CLERK FILING 0905 14THjdc.pdf
9801K

Gmail - King 2021-2773.pdf
249K

NOTICE OF LITIGATION PRESERVATION _ LOUISIANA BOARD OF ETHIC, FEDERAL DOJ (1).eml
13774K

True King <truekingfile@gmail.com> Mon, Oct 12, 2026 at 2:41 PM
Draft To: True King <truekingfile@gmail.com>

Louisiana Legislative Auditor, Investigations - rharris@lla.la.gov

Louisiana Legislative Auditor, Local Government Services - dallison@lla.la.gov

Louisiana Attorney General, Constituent Services - constituentservices@ag.louisiana.gov

---------- Forwarded message ---------
From: **True King** <truekingfile@gmail.com>
Date: Wed, Oct 7, 2026 at 12:19 PM
Subject: Re: NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ
To: Michelle Jordan <mjordan@calcasieuclerk.gov>
CC: Michelle Pitsch (mpitsch@14jdc.org) <mpitsch@14jdc.org>, Lynn Jones <lynnjones@calcasieuclerk.gov>, The Kings <fit4thekings@gmail.com>

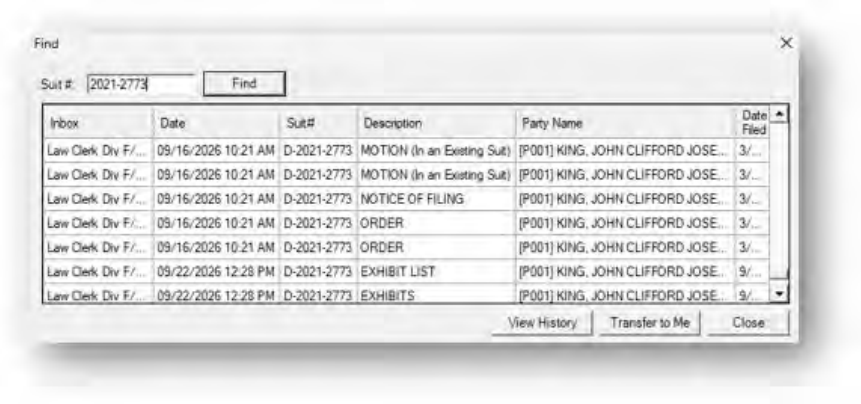
Ms. Jordan,
The enclosed has been escalated.
It does not appear that Ms Rhonda intends to comply and if you dig further you will find that she has denied due process to encourage harassment through litigation and no such motion for colston even exists. It's imaginary and they made it up as retaliatory action for the federal lawsuit I have filed against 14th JDC. I repeat see attached that the hearing they scheduled for January is imaginary, there are no merits and no motion has been filed to have it and for two years they've used it as a tool for abuse and deny due process. They have held my motions for years and have always charged me duplicate fees and sometimes took 14 months plus to get a motion signed.

Please find escalated report enclosed and exhibits featuring Judge Redd refusal to comply that this case is not in his court. They are saying opposite of what your email states.
J. King

On Tue, Oct 6, 2026 at 11:03 AM Michelle Jordan <mjordan@calcasieuclerk.gov> wrote:

> Mr. King,
>
> The following information is provided by our Civil Processing Supervisors:
>
> *"The Clerk of Court is not holding anything in #2021-2773 for either party, and we are upholding the pauper status for Mr. King.*
>
> *When doing a quick search for any held pleadings, it appears that this case has an AD HOC judge that is handled differently than the normal process, which takes a longer time for a live signature.*

Below is a screen shot of the internal tracking showing that all documents in question are currently with the Law Clerk/Div F:



Mr. King's email noted that he contacted Div A office, who are not over his case.

Ad Hoc Judge H. Ward Fontenot is the judge over his case.

We believe that believe that Div A misinterpreted the internal screen, in informing him it was being held for costs.

Mr. King's pleadings are not being held by the Clerk of Court office. It is at the Judges office waiting the Ad Hoc Judge's live signature.

Again, the Clerk's office is honoring his pauper status in the listed case."

Calcasieu Parish Clerk of Court

Phone: 337-437-3550

Web: www.calcasieuclerk.gov

1000 Ryan Street, Rm 5 (70601) Physical

P.O. Box 1030 (70602) Mailing

Lake Charles, LA

From: True King <truekingfile@gmail.com>
Sent: Monday, October 5, 2026 3:18 PM
Subject: NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ

You don't often get email from truekingfile@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the **Calcasieu Parish Clerk of Court's Office**. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch, sgould@14jdcfjc.org

[ ]

October 5, 2026

To: Louisiana Legislative Auditor – Investigations Division
CC: Louisiana Department of Justice / Attorney General – Constituent Services and Special Investigations
Re: URGENT REQUEST FOR IMMEDIATE INTERVENTION AND INDEPENDENT REVIEW – CALCASIEU PARISH CLERK OF COURT – KING v. COLSTON, 14th JDC No. 2021-2773

Dear Sir or Madam:

I respectfully submit the enclosed materials and request **immediate independent intervention and review** concerning the handling of my filings by the Calcasieu Parish Clerk of Court in **King v. Colston, Fourteenth Judicial District Court, Docket No. 2021-2773, Division A**.

On September 22, 2026, I submitted a verified motion expressly directing the Clerk to file the pleading into the record and present it to the Honorable W. Mitchell Redd, or the properly assigned or ad hoc judge, for judicial consideration. King Motion 2773 That filing requested, among other relief, identification of unresolved motions and Rules to Show Cause, suspension or extension of discovery deadlines, clarification of the issues remaining for trial, and preservation of state and federal rights. King Motion 2773

On October 5, 2026, Judge Redd's office advised me in writing that the Clerk's records showed my documents were **"being held for costs" and had not been sent to the Judge's office**. The effect is that the Clerk's administrative handling is preventing the assigned judge from even receiving and considering a motion that specifically asks the Court to address unresolved judicial matters.

This is especially concerning because the September 22 filing expressly preserved objections involving **unresolved motions, the pending Rule to Show Cause, due process, discovery, attorney fees, costs, appellate remedies, and federal remedies**. King Motion 2773 The filing also asks the Court to determine the status of an unresolved Rule to Show Cause and other pending matters before the parties are required to incur additional discovery and litigation expense. King Motion 2773

The enclosed records further reflect that Orders to Show Cause concerning **Orelia Lawdins** and **Charmaine Colston** were previously issued and set for hearing. My present request is substantially directed toward obtaining judicial action on matters that have already been placed before the Court, rather than repeatedly filing duplicative pleadings merely to obtain a reset or ruling.

I contend that I am proceeding under an operative pauper privilege and that requiring advance costs as a condition to filing, docketing, routing, or transmitting an otherwise proper pleading raises serious concerns under **La. C.C.P. arts. 5181, 5184, and 5185**. I am not asking your office to decide the merits of the underlying domestic litigation. I am asking for review of whether administrative cost practices are being used in a manner that improperly obstructs access to judicial consideration.

I am also concerned because this incident does not arise in isolation. I have previously complained about substantial delays in the processing and routing of my filings, unequal treatment in scheduling and administrative access, and the handling of matters involving opposing counsel and court staff. I have related federal civil-rights litigation and have previously placed court personnel on notice of due-process, disability-access, and retaliation concerns. For that reason, the present withholding of my filing warrants an **independent review rather than review solely by the same office whose conduct is being challenged**.

I am **not asking your office to presume retaliation or intentional misconduct** from the present facts alone. I am requesting an investigation sufficient to determine:

1. why the September 22, 2026 filing was placed on a cost hold;
2. the exact amount and legal basis of the costs allegedly due;
3. whether my pauper status was ever lawfully rescinded or expired;
4. whether any traverse of pauper status was filed pursuant to La. C.C.P. art. 5184;
5. whether a contradictory hearing occurred before any change in pauper status;
6. which employee or employees placed, approved, or maintained the cost hold;
7. why the filing was not transmitted to Division A for judicial consideration;
8. whether similar filing, scheduling, and reset requests have been handled differently for opposing parties or counsel;
9. whether duplicate or repetitive costs have been assessed against pleadings addressing matters already subject to prior court orders; and
10. whether any retaliatory, discriminatory, or otherwise improper administrative conduct occurred.

Immediate intervention requested

Because discovery and pretrial deadlines continue to run while my motion has not even reached the assigned judge, I respectfully request **immediate intervention** to prevent additional prejudice.

Specifically, I ask that the appropriate oversight authority:

- contact the Calcasieu Parish Clerk of Court concerning the present filing hold;
- require preservation of all relevant records;
- request an itemized accounting of the costs allegedly supporting the hold;
- determine whether the Clerk had lawful authority to prevent the filing from being transmitted to the judge;
- ensure that the September 22 filing is promptly presented to the appropriate judicial officer;
- request that an uninvolved senior administrator handle my filings while this matter is reviewed; and
- refer any evidence of unlawful conduct, misuse of public office, retaliation, financial irregularity, or civil-rights violations to the agency with appropriate jurisdiction.

Preservation of evidence

Please also treat this correspondence as notice that the records identified in the enclosed **Notice of Anticipated Litigation and Demand for Preservation of Records** are potentially relevant evidence.

I specifically request preservation of all Clerk Connect entries, cost and fee codes, audit logs, routing records, intake records, internal emails, text or messaging records maintained on government systems, telephone logs, scheduling records, communications with parties or counsel concerning this case, records showing changes to filing status, and metadata concerning the September 22 filing and prior filing delays.

Enclosures

Enclosed for review are:

1. **Formal Notice of Objection to Holding Pauper Filings for Costs and Request for Immediate Transmittal to the Assigned Judge;**
2. **Notice of Anticipated Litigation and Demand for Preservation of Records;**
3. the September 22, 2026 Verified Motion and cover filing;
4. the October 5, 2026 correspondence confirming that the documents are being held for costs and have not been sent to Judge Redd;
5. previously issued Orders to Show Cause involving Orelia Lawdins and Charmaine Colston;
6. relevant docket and case-history materials;
7. prior appellate and pauper-status materials; and
8. supporting documentation concerning the procedural and due-process concerns described above.

My September filing expressly reserves claims arising under the **Fourteenth Amendment and 42 U.S.C. § 1983** concerning notice, opportunity to be heard, and the administration of these proceedings. King Motion 2773

I respectfully request **written acknowledgment of this complaint, identification of the office or investigator assigned to review it, and immediate notification if additional documentation is required**.

Because the underlying filing is presently being withheld from the judge while litigation deadlines continue to run, I respectfully ask that this matter be treated as **URGENT AND TIME-SENSITIVE**.

Respectfully submitted,

/s/ John C. J. King, Sr.
John C. J. King, Sr.
4459 Nelson Road, Suite 105 #2133
Lake Charles, Louisiana 70605
Telephone: **318-995-1705**
Email: **truekingfile@gmail.com**

RE: King v. Colston
14th Judicial District Court
Docket No. 2021-2773, Division A

---------- Forwarded message ----------
From: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
To: charmaine colston <charmaineycolston@gmail.com>, "truekingfile@gmail.com" <truekingfile@gmail.com>, Randall Serrett <randall.serrett.dcfs@la.gov>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>, Orelia Lawdins <Orelial@gallienlawdins.com>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:

Date: Wed, 7 Oct 2026 15:24:01 +0000
Subject: RE: King 2021-2773

Ms. Colston, you must always include Mr. King in your communications with the Court. I have cc'd him herein. Also, if the State is still involved, Mr. Serrett must be included as well. I have also cc'd him herein.

Ms. Lawdins, are you still representing Ms. Colston? I am asking because when a party is represented by an attorney, we normally communicate only with the attorney. Please let me know.

We are in the process of determining exactly what is set and will let all parties know.

Rhonda Verzwyvelt

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: charmaine colston <charmaineycolston@gmail.com>
Sent: Wednesday, October 7, 2026 10:16 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>; Orelia Lawdins <Orelial@gallienlawdins.com>; Jodi Harlow <jharlow@14jdcfjc.org>
Subject: Re: King 2021-2773

Good morning,

I am requesting clarification regarding the upcoming January court dates.

DCFS contacted me today and advised that the NCP privately filed a 42-page modification and that the January court dates are related to that filing.

This was the first time I was made aware of the modification, as I was under the impression that the January dates were scheduled in connection with the pending contempt matter.

Could you please clarify exactly what matters are scheduled to be heard in January?

Specifically, I would like to know whether the January dates are for the NCP's modification, the contempt matter, or both.

Thank you for your clarification.

Best,

Charmaine Y. Colston

> On Sep 21, 2026, at 6:33 PM, charmaine colston <charmaineycolston@gmail.com> wrote:
>
> Thank you! Confirmed!
>
> > On Sep 21, 2026, at 2:50 PM, Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:
> >
> > All, attached is the new pre-trial order in the above matter. **Please carefully review and calendar all deadlines, as we have set a Zoom PTC prior to the trial**.
> >
> > Please also confirm receipt and that you accept notice via email in lieu of formal service. Thanks.
> >
> > *Rhonda Verzwyvelt*
> >
> > *Paralegal to*
> >
> > *Judge W. Mitchell Redd*
> >
> > *14th JDC, Family Court*
> >
> > *1000 Ryan Street, North Annex*
> >
> > *Lake Charles, LA 70601*
> >
> > *rverzwyvelt@14jdcfjc.org*
> >
> > *337-437-3645*
> >
> > *337-437-3363, Ext. 47*
> >
> > *Fax – 337-437-3390*
> >
> > <DOC092126-09212026144227.pdf>

---------- Forwarded message ----------
From: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: charmaine colston <charmaineycolston@gmail.com>, "truekingfile@gmail.com" <truekingfile@gmail.com>, Randall Serrett <Randall.Serrett.DCFS@la.gov>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Wed, 7 Oct 2026 15:47:31 +0000
Subject: Re: King 2021-2773
Ms. Verzwyvelt,
Yes, I do represent Ms. Colston and my apologies for the confusion. As she is getting conflicting information and this process is very frustrating for her. Moving forward we will not have this issue. Thank you.

Sincerely,
Orelia Lawdins-Trent , J. D., M. S.
Attorney . Certified Mediator

500 Broad Street, Suite 214
Mail to: P. O. Box 16351 (70616)
Lake Charles, LA 70601
Phone: 337.275.5124
Fax: 337.275.5125

CONFIDENTIALITY MESSAGE

Privileged:

This email contains PRIVILEGED and CONFIDENTIAL information intended only for the use of the specific individual or entity named above. If you or your employer is not the intended recipient of this e-mail or an employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any unauthorized

dissemination or copying of this e-mail is strictly prohibited. If you have received this transmission in error, please immediately delete the message and contact the sender at 337-275-5124. **Please consider the environment before printing this e-mail.**

On Oct 7, 2026, at 10:24 AM, Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

Ms. Colston, you must always include Mr. King in your communications with the Court. I have cc'd him herein. Also, if the State is still involved, Mr. Serrett must be included as well. I have also cc'd him herein.

Ms. Lawdins, are you still representing Ms. Colston? I am asking because when a party is represented by an attorney, we normally communicate only with the attorney. Please let me know.

We are in the process of determining exactly what is set and will let all parties know.

Rhonda Verzwyvelt

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: charmaine colston <charmaineycolston@gmail.com>
Sent: Wednesday, October 7, 2026 10:16 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>; Orelia Lawdins <Orelial@gallienlawdins.com>; Jodi Harlow <jharlow@14jdcfjc.org>
Subject: Re: King 2021-2773

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Could you please clarify exactly what matters are scheduled to be heard in January?

Specifically, I would like to know whether the January dates are for the NCP's modification, the contempt matter, or both.

Thank you for your clarification.

Best,

Charmaine Y. Colston

On Sep 21, 2026, at 6:33 PM, charmaine colston <charmaineycolston@gmail.com> wrote:

Thank you! Confirmed!

On Sep 21, 2026, at 2:50 PM, Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

All, attached is the new pre-trial order in the above matter. **Please carefully review and calendar all deadlines, as we have set a Zoom PTC prior to the trial**.

Please also confirm receipt and that you accept notice via email in lieu of formal service. Thanks.

Rhonda Verzwyvelt

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

<DOC092126-09212026144227.pdf>

---------- Forwarded message ----------
From: True King <truekingfile@gmail.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Mon, 5 Oct 2026 10:36:15 -0400
Subject: Re: King 2021-2773

Subject: Request for Clarification Regarding Pauper Status, Duplicate Costs, Outstanding Orders, and Need for Emergency Relief

Good morning,

The filings at issue are **pauper filings that should not be held for costs**, and several appear to be repetitive of matters for which relief has already been granted or remains pending.

Specifically:

1. **Order to Show Cause concerning Orelia Lawdins;**
2. **Order to Show Cause concerning Charmaine Colston;**
3. **A pending hearing concerning the exceptions, together with an existing court order that remains uncured;** and
4. **Additional orders previously granted through the ordinary judicial process and with due process afforded.**

Again, this is a **pauper proceeding in a matter that has not reached final judgment**, yet multiple and seemingly duplicative court costs have been assessed across more than ten pleadings.

The supervisory writ record has already addressed Mr. King's pauper status and determined that the status could not simply be rescinded while matters subject to the appellate proceedings remained unresolved. I therefore respectfully request clarification as to why additional filing costs continue to be assessed against pleadings submitted under pauper status and whether those assessments are consistent with the appellate ruling and the current procedural posture of the case.

It also appears that **Ms. Colston has submitted pleadings under pauper status and that her application was accepted by the Court**. If so, I respectfully request that the same procedural standards be applied consistently to both parties.

At this point, I am requesting guidance as to whether an application for a **temporary restraining order or other emergency protective relief** is necessary to preserve the status quo and prevent further prejudice while these procedural and due-process issues remain unresolved, or whether **Judge Redd will first be made aware of these outstanding matters so they may be addressed without further escalation**.

My intent is to obtain compliance with the existing orders, preserve the appellate rulings already entered, and ensure that the pending matters receive a fair and orderly resolution.

Please advise how the Court intends to proceed.

Respectfully,

John C King Sr.

On Mon, Oct 5, 2026 at 10:23 AM Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

> Please always copy Ms. Lawdins when you email the Judge's office. I have included her herein.
>
> I checked the clerk of court's website, and apparently your documents are being held for costs, and they have not yet been sent to the Judge's office.
>
> Thanks.
>
> *Rhonda Verzwyvelt*
>
> *Paralegal to*
>
> *Judge W. Mitchell Redd*
>
> *14th JDC, Family Court*
>
> *1000 Ryan Street, North Annex*
>
> *Lake Charles, LA 70601*
>
> *rverzwyvelt@14jdcfjc.org*
>
> *337-437-3645*
>
> *337-437-3363, Ext. 47*
>
> *Fax – 337-437-3390*
>
> ---
>
> **From:** True King <truekingfile@gmail.com>
> **Sent:** Friday, October 2, 2026 8:09 AM
> **To:** Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
> **Cc:** True King <truekingfile@gmail.com>
> **Subject:** Re: King 2021-2773
>
> Mrs Verzwyvelt,
>
> I was instructed to reach out in regards to if my motions have been signed or if there needs to be an investigation into the clerks office as currently the are charges filed for intentional delays and misconduct. The motion were filed and stamped September 22, 2026 and since you're "requiring" discovery due next month an objection would need to be escalated for a federal injunction to pause proceedings if the discrimination is unethical on face value. I. E. Motions being held to prevent due process.
>
> Research has been following the number of days it requires to get my motions signed since 2021 vs Lawdins- Trent in regards to my gender and racial discrimination claims. Before including this incident in the charges the federal clerk would like to know if Judge Redd is receiving the correspondence, or is justice being denied by the clerks office.
>
> Please respond today so counsel can know who the charges should be directed towards the 14th JDC or the county clerks for these repeated oversights.
>
> It appears responses happen same day when Colston calls Judge Redd office yet some of my motions were held over 109 days in one instance.
>
> Please advise if Judge Redd is aware of this discrepancy so that the appropriate charges are assigned to the appropriate defendants.

Thank You

John King

On Tue, Sep 22, 2026 at 1:51 PM True King <truekingfile@gmail.com> wrote:

> Ms. Verzwyvelt,
>
> Please find attached the motions and related filing submitted into the record in King v. Colston, No. 2021-2773.
>
> Please also treat this correspondence and the attached pleadings as electronic service upon the parties to the extent permitted by the Court's September 21, 2026 correspondence and pretrial order, which requested confirmation of receipt and acceptance of notice by email in lieu of formal service.
>
> The Court's order specifically invited the parties to notify the Court of matters requiring immediate attention or assistance toward resolution. I am therefore requesting immediate written clarification and judicial attention to the following matters before discovery deadlines continue to run or additional pretrial and trial proceedings occur.
>
> **1. Interstate Proceedings and Existing New Jersey Orders**
>
> There are ongoing proceedings and orders involving New Jersey that concern the same parties and overlapping subject matter.
>
> The Court should determine, before proceeding further, which issues remain within Louisiana's jurisdiction and which issues have already been addressed through New Jersey interstate enforcement proceedings.
>
> I have also provided notice of New Jersey medical injunctive relief concerning participation in proceedings that have caused or aggravated serious neurological symptoms. The operative language and effect of those New Jersey orders should be reviewed before requiring further participation inconsistent with their terms.
>
> Written correspondence remains possible and is the appropriate means for addressing these matters while the jurisdictional and medical issues remain unresolved.
>
> **2. Express Relinquishment of Custody, Contact, Visitation, and Pursuit of Parental Relationship**
>
> I am expressly placing into the record that I do not seek custody, visitation, reunification, communication, or contact with the remaining minor child.
>
> As set forth more fully in the attached pleading, I am also willing to voluntarily surrender all parental rights necessary to permit a lawful adoption proceeding if Ms. Colston wishes to have her present spouse or another legally qualified person adopt the remaining minor child.
>
> I will not pursue future visitation or communication through this docket if a lawful permanent resolution can be reached.
>
> **3. John King, Jr. – Emancipation**
>
> John King, Jr. has reached age seventeen.
>
> To the extent Louisiana law permits him to pursue judicial emancipation and he independently elects to do so, I will not oppose that request and am willing to provide any lawful parental consent required from me.
>
> This should be distinguished from my separate request concerning voluntary surrender for adoption of the remaining minor child.
>
> **4. Jayla E. King Has Reached Majority**
>
> Jayla E. King is now eighteen years old.
>
> She is no longer a minor for purposes of ordinary custody and visitation proceedings. She is presently a freshman in college, lives on campus, and receives financial aid.
>
> Accordingly, the Court should identify whether any presently scheduled custody, visitation, or parental-access issue purports to concern Jayla and, if so, the legal basis for continuing that issue after she reached majority.
>
> **5. Remaining Minor Child – Jakai King**
>
> Jakai King is the only remaining young minor child implicated by the present family-court proceedings.
>
> His financial-support obligations are administered through Louisiana DCFS and enforced interstate through New Jersey.
>
> There is therefore a fundamental question that must be answered before discovery and trial preparation continue:
>
> **What specific custody, visitation, support, contempt, enforcement, attorney-fee, or other controversy concerning Jakai remains for trial?**
>
> If support is being administered through the existing support-enforcement system and I am not seeking custody, visitation, reunification, or contact, the Court should identify what substantive parental dispute remains.
>
> **6. Court Must Identify the Undefined "Matters" Before Requiring Discovery**
>
> The current pretrial order refers generally to a trial and imposes deadlines, but I still have not been provided a specific identification of the claims or "matters" that remain for adjudication.
>
> That information is necessary before meaningful discovery can occur.
>
> Without knowing the operative claims, I cannot determine:
>
> - what discovery is relevant;
> - what documents are necessary;
> - what witnesses must be identified or subpoenaed;
> - what interstate records are required;
> - what defenses must be prepared;
> - what legal research is necessary; or
> - the scope and financial cost of representation necessary for counsel.

The attached filing therefore formally requests that the Court identify the operative pleadings and every issue presently designated for trial before requiring completion of discovery.

7. Request for Permanent Finality and No Contact

Ms. Colston has repeatedly stated in pleadings and recorded proceedings that I should not have contact with the children.

I am prepared to provide the permanent separation she has repeatedly requested through a lawful final order.

If legally permissible, I request a permanent arrangement under which I relinquish the pursuit of custody, visitation, and contact and, where a qualifying adoption is pursued, voluntarily surrender the parental rights necessary for that adoption.

My immediate family likewise seeks permanent separation from unnecessary interaction with Ms. Colston.

Subject to lawful court approval, I am willing to agree that neither I nor members of the Guillory/King family will initiate contact with Jakai King before he reaches majority or is otherwise legally emancipated, and that we will maintain a distance of at least fifty feet absent an emergency, a lawful court directive, or another circumstance expressly authorized by law.

In exchange for this permanent separation, I ask the Court to determine whether reciprocal no-contact and anti-harassment relief can be entered prohibiting unnecessary contact with me, my spouse, my mother, my brothers, employers, educational institutions, and other immediate family members.

The purpose is simple: **permanent finality and an end to unnecessary interaction between the households.**

8. Existing Rule to Show Cause

There is already a signed Rule or Order to Show Cause in the record that remains unresolved.

Please advise in writing:

1. whether that Rule remains pending;
2. when it will be heard;
3. what issues it encompasses;
4. whether it will be resolved before the newly scheduled pretrial and trial proceedings; and
5. why additional proceedings are being scheduled before that signed Rule is addressed.

9. Request to Determine Whether Any Merits Trial Remains Necessary

Because:

- Jayla is eighteen;
- John King, Jr. is seventeen and nearing completion of high school;
- Jakai is the only remaining young minor child;
- I am not seeking custody or visitation;
- I am willing to voluntarily surrender parental rights necessary for lawful adoption;
- support is already subject to interstate administration and enforcement; and
- a Rule to Show Cause remains unresolved,

I respectfully request that the Court state in writing what remaining controversy requires a merits trial.

If there is no remaining custody or visitation dispute and the support issues are being administered through the appropriate state agencies, I request that the Court advise whether the remaining matters can be dismissed, resolved through the already-pending Rule to Show Cause, or reduced to a final order providing permanent closure.

10. Preservation of Rights

Nothing in this correspondence waives any previously asserted objection concerning service, notice, interstate jurisdiction, recusal, unresolved motions, discovery, due process, appellate review, federal proceedings, medical accommodations, or existing New Jersey orders.

Please place this correspondence and the attached filing into the record and provide them to Judge Redd before any discovery deadline or further substantive proceeding occurs.

I am specifically requesting a written response identifying:

the exact pleadings, claims, and matters that remain before the Court and the legal or procedural basis upon which the January trial is presently being scheduled.

Thank you,

John C. J. King, Sr.
Pro Se
Case No. 2021-2773

All rights and objections under applicable state and federal law are expressly reserved.

ENCLOSURE: MOTIONS AND EXHIBITS FILED WITH CALCASIEU CLERK OF COURT

On Mon, Sep 21, 2026 at 3:50 PM Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

> All, attached is the new pre-trial order in the above matter. **Please carefully review and calendar all deadlines, as we have set a Zoom PTC prior to the trial**.
>
> Please also confirm receipt and that you accept notice via email in lieu of formal service. Thanks.
>
> *Rhonda Verzwyvelt*

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

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337-437-3363, Ext. 47

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---------- Forwarded message ----------
From: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
To: True King <truekingfile@gmail.com>, Orelia Lawdins-Trent <orelial@lawdinslaw.com>
Cc: Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Mon, 5 Oct 2026 14:08:06 +0000
Subject: RE: King 2021-2773

Please always copy Ms. Lawdins when you email the Judge's office. I have included her herein.

I checked the clerk of court's website, and apparently your documents are being held for costs, and they have not yet been sent to the Judge's office.

Thanks.

Rhonda Verzwyvelt

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: True King <truekingfile@gmail.com>
Sent: Friday, October 2, 2026 8:09 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: True King <truekingfile@gmail.com>
Subject: Re: King 2021-2773

Mrs Verzwyvelt,

I was instructed to reach out in regards to if my motions have been signed or if there needs to be an investigation into the clerks office as currently the are charges filed for intentional delays and misconduct. The motion were filed and stamped September 22, 2026 and since you're "requiring" discovery due next month an objection would need to be escalated for a federal injunction to pause proceedings if the discrimination is unethical on face value. I. E. Motions being held to prevent due process.

Research has been following the number of days it requires to get my motions signed since 2021 vs Lawdins- Trent in regards to my gender and racial discrimination claims. Before including this incident in the charges the federal clerk would like to know if Judge Redd is receiving the correspondence, or is justice being denied by

the clerks office.

Please respond today so counsel can know who the charges should be directed towards the 14th JDC or the county clerks for these repeated oversights.

It appears responses happen same day when Colston calls Judge Redd office yet some of my motions were held over 109 days in one instance.

Please advise if Judge Redd is aware of this discrepancy so that the appropriate charges are assigned to the appropriate defendants.

Thank You

John King

On Tue, Sep 22, 2026 at 1:51 PM True King <truekingfile@gmail.com> wrote:

> Ms. Verzwyvelt,
>
> Please find attached the motions and related filing submitted into the record in King v. Colston, No. 2021-2773.
>
> Please also treat this correspondence and the attached pleadings as electronic service upon the parties to the extent permitted by the Court's September 21, 2026 correspondence and pretrial order, which requested confirmation of receipt and acceptance of notice by email in lieu of formal service.
>
> The Court's order specifically invited the parties to notify the Court of matters requiring immediate attention or assistance toward resolution. I am therefore requesting immediate written clarification and judicial attention to the following matters before discovery deadlines continue to run or additional pretrial and trial proceedings occur.
>
> **1. Interstate Proceedings and Existing New Jersey Orders**
>
> There are ongoing proceedings and orders involving New Jersey that concern the same parties and overlapping subject matter.
>
> The Court should determine, before proceeding further, which issues remain within Louisiana's jurisdiction and which issues have already been addressed through New Jersey interstate enforcement proceedings.
>
> I have also provided notice of New Jersey medical injunctive relief concerning participation in proceedings that have caused or aggravated serious neurological symptoms. The operative language and effect of those New Jersey orders should be reviewed before requiring further participation inconsistent with their terms.
>
> Written correspondence remains possible and is the appropriate means for addressing these matters while the jurisdictional and medical issues remain unresolved.
>
> **2. Express Relinquishment of Custody, Contact, Visitation, and Pursuit of Parental Relationship**
>
> I am expressly placing into the record that I do not seek custody, visitation, reunification, communication, or contact with the remaining minor child.
>
> As set forth more fully in the attached pleading, I am also willing to voluntarily surrender all parental rights necessary to permit a lawful adoption proceeding if Ms. Colston wishes to have her present spouse or another legally qualified person adopt the remaining minor child.
>
> I will not pursue future visitation or communication through this docket if a lawful permanent resolution can be reached.
>
> **3. John King, Jr. – Emancipation**
>
> John King, Jr. has reached age seventeen.
>
> To the extent Louisiana law permits him to pursue judicial emancipation and he independently elects to do so, I will not oppose that request and am willing to provide any lawful parental consent required from me.
>
> This should be distinguished from my separate request concerning voluntary surrender for adoption of the remaining minor child.
>
> **4. Jayla E. King Has Reached Majority**
>
> Jayla E. King is now eighteen years old.
>
> She is no longer a minor for purposes of ordinary custody and visitation proceedings. She is presently a freshman in college, lives on campus, and receives financial aid.
>
> Accordingly, the Court should identify whether any presently scheduled custody, visitation, or parental-access issue purports to concern Jayla and, if so, the legal basis for continuing that issue after she reached majority.
>
> **5. Remaining Minor Child – Jakai King**
>
> Jakai King is the only remaining young minor child implicated by the present family-court proceedings.
>
> His financial-support obligations are administered through Louisiana DCFS and enforced interstate through New Jersey.
>
> There is therefore a fundamental question that must be answered before discovery and trial preparation continue:
>
> **What specific custody, visitation, support, contempt, enforcement, attorney-fee, or other controversy concerning Jakai remains for trial?**
>
> If support is being administered through the existing support-enforcement system and I am not seeking custody, visitation, reunification, or contact, the Court should identify what substantive parental dispute remains.
>
> **6. Court Must Identify the Undefined "Matters" Before Requiring Discovery**
>
> The current pretrial order refers generally to a trial and imposes deadlines, but I still have not been provided a specific identification of the claims or "matters" that remain for adjudication.
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> That information is necessary before meaningful discovery can occur.

Without knowing the operative claims, I cannot determine:

- what discovery is relevant;
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The attached filing therefore formally requests that the Court identify the operative pleadings and every issue presently designated for trial before requiring completion of discovery.

7. Request for Permanent Finality and No Contact

Ms. Colston has repeatedly stated in pleadings and recorded proceedings that I should not have contact with the children.

I am prepared to provide the permanent separation she has repeatedly requested through a lawful final order.

If legally permissible, I request a permanent arrangement under which I relinquish the pursuit of custody, visitation, and contact and, where a qualifying adoption is pursued, voluntarily surrender the parental rights necessary for that adoption.

My immediate family likewise seeks permanent separation from unnecessary interaction with Ms. Colston.

Subject to lawful court approval, I am willing to agree that neither I nor members of the Guillory/King family will initiate contact with Jakai King before he reaches majority or is otherwise legally emancipated, and that we will maintain a distance of at least fifty feet absent an emergency, a lawful court directive, or another circumstance expressly authorized by law.

In exchange for this permanent separation, I ask the Court to determine whether reciprocal no-contact and anti-harassment relief can be entered prohibiting unnecessary contact with me, my spouse, my mother, my brothers, employers, educational institutions, and other immediate family members.

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Please advise in writing:

1. whether that Rule remains pending;
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Because:

- Jayla is eighteen;
- John King, Jr. is seventeen and nearing completion of high school;
- Jakai is the only remaining young minor child;
- I am not seeking custody or visitation;
- I am willing to voluntarily surrender parental rights necessary for lawful adoption;
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I respectfully request that the Court state in writing what remaining controversy requires a merits trial.

If there is no remaining custody or visitation dispute and the support issues are being administered through the appropriate state agencies, I request that the Court advise whether the remaining matters can be dismissed, resolved through the already-pending Rule to Show Cause, or reduced to a final order providing permanent closure.

10. Preservation of Rights

Nothing in this correspondence waives any previously asserted objection concerning service, notice, interstate jurisdiction, recusal, unresolved motions, discovery, due process, appellate review, federal proceedings, medical accommodations, or existing New Jersey orders.

Please place this correspondence and the attached filing into the record and provide them to Judge Redd before any discovery deadline or further substantive proceeding occurs.

I am specifically requesting a written response identifying:

the exact pleadings, claims, and matters that remain before the Court and the legal or procedural basis upon which the January trial is presently being scheduled.

Thank you,

John C. J. King, Sr.
Pro Se
Case No. 2021-2773

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ENCLOSURE: MOTIONS AND EXHIBITS FILED WITH CALCASIEU CLERK OF COURT

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Cc: True King <truekingfile@gmail.com>
Bcc:
Date: Fri, 2 Oct 2026 09:09:22 -0400
Subject: Re: King 2021-2773
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Thank you,

John C. J. King, Sr.
Pro Se
Case No. 2021-2773

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>
> *Rhonda Verzwyvelt*
>
> *Paralegal to*
>
> *Judge W. Mitchell Redd*
>
> *14th JDC, Family Court*
>
> *1000 Ryan Street, North Annex*
>
> *Lake Charles, LA 70601*
>
> *rverzwyvelt@14jdcfjc.org*
>
> *337-437-3645*
>
> *337-437-3363, Ext. 47*
>
> *Fax – 337-437-3390*

---------- Forwarded message ----------
From: True King <truekingfile@gmail.com>
To: undisclosed-recipients:;
Cc:
Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch <mpitsch@14jdc.org>, sgould@14jdcfjc.org
Date: Mon, 5 Oct 2026 16:17:34 -0400
Subject: NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ

Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch, sgould@14jdcfjc.org

October 5, 2026

To: Louisiana Legislative Auditor – Investigations Division
CC: Louisiana Department of Justice / Attorney General – Constituent Services and Special Investigations
Re: URGENT REQUEST FOR IMMEDIATE INTERVENTION AND INDEPENDENT REVIEW – CALCASIEU PARISH CLERK OF COURT – KING v. COLSTON, 14th JDC No. 2021-2773

Dear Sir or Madam:

I respectfully submit the enclosed materials and request **immediate independent intervention and review** concerning the handling of my filings by the Calcasieu Parish Clerk of Court in **King v. Colston, Fourteenth Judicial District Court, Docket No. 2021-2773, Division A**.

On September 22, 2026, I submitted a verified motion expressly directing the Clerk to file the pleading into the record and present it to the Honorable W. Mitchell Redd, or the properly assigned or ad hoc judge, for judicial consideration. King Motion 2773 That filing requested, among other relief, identification of unresolved motions and Rules to Show Cause, suspension or extension of discovery deadlines, clarification of the issues remaining for trial, and preservation of state and federal rights. King Motion 2773

On October 5, 2026, Judge Redd's office advised me in writing that the Clerk's records showed my documents were **"being held for costs" and had not been sent to the Judge's office**. The effect is that the Clerk's administrative handling is preventing the assigned judge from even receiving and considering a motion that specifically asks the Court to address unresolved judicial matters.

This is especially concerning because the September 22 filing expressly preserved objections involving **unresolved motions, the pending Rule to Show Cause, due process, discovery, attorney fees, costs, appellate remedies, and federal remedies**. King Motion 2773 The filing also asks the Court to determine the status of an unresolved Rule to Show Cause and other pending matters before the parties are required to incur additional discovery and litigation expense. King Motion 2773

The enclosed records further reflect that Orders to Show Cause concerning **Orelia Lawdins** and **Charmaine Colston** were previously issued and set for hearing. My present request is substantially directed toward obtaining judicial action on matters that have already been placed before the Court, rather than repeatedly filing duplicative pleadings merely to obtain a reset or ruling.

I contend that I am proceeding under an operative pauper privilege and that requiring advance costs as a condition to filing, docketing, routing, or transmitting an otherwise proper pleading raises serious concerns under **La. C.C.P. arts. 5181, 5184, and 5185**. I am not asking your office to decide the merits of the underlying domestic litigation. I am asking for review of whether administrative cost practices are being used in a manner that improperly obstructs access to judicial consideration.

I am also concerned because this incident does not arise in isolation. I have previously complained about substantial delays in the processing and routing of my filings, unequal treatment in scheduling and administrative access, and the handling of matters involving opposing counsel and court staff. I have related federal civil-rights litigation and have previously placed court personnel on notice of due-process, disability-access, and retaliation concerns. For that reason, the present withholding of my filing warrants an **independent review rather than review solely by the same office whose conduct is being challenged**.

I am **not asking your office to presume retaliation or intentional misconduct** from the present facts alone. I am requesting an investigation sufficient to determine:

1. why the September 22, 2026 filing was placed on a cost hold;
2. the exact amount and legal basis of the costs allegedly due;
3. whether my pauper status was ever lawfully rescinded or expired;
4. whether any traverse of pauper status was filed pursuant to La. C.C.P. art. 5184;
5. whether a contradictory hearing occurred before any change in pauper status;

---------- Forwarded message ----------
From: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
To: charmaine colston <charmaineycolston@gmail.com>, "truekingfile@gmail.com" <truekingfile@gmail.com>, Randall Serrett <randall.serrett.dcfs@la.gov>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>, Orelia Lawdins <Orelial@gallienlawdins.com>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Wed, 7 Oct 2026 15:24:01 +0000
Subject: RE: King 2021-2773

Ms. Colston, you must always include Mr. King in your communications with the Court. I have cc'd him herein. Also, if the State is still involved, Mr. Serrett must be included as well. I have also cc'd him herein.

Ms. Lawdins, are you still representing Ms. Colston? I am asking because when a party is represented by an attorney, we normally communicate only with the attorney. Please let me know.

We are in the process of determining exactly what is set and will let all parties know.

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Paralegal to

Judge W. Mitchell Redd

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1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: charmaine colston <charmaineycolston@gmail.com>
Sent: Wednesday, October 7, 2026 10:16 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>; Orelia Lawdins <Orelial@gallienlawdins.com>; Jodi Harlow <jharlow@14jdcfjc.org>
Subject: Re: King 2021-2773

Good morning,

I am requesting clarification regarding the upcoming January court dates.

DCFS contacted me today and advised that the NCP privately filed a 42-page modification and that the January court dates are related to that filing.

This was the first time I was made aware of the modification, as I was under the impression that the January dates were scheduled in connection with the pending contempt matter.

Could you please clarify exactly what matters are scheduled to be heard in January?

Specifically, I would like to know whether the January dates are for the NCP's modification, the contempt matter, or both.

Thank you for your clarification.

Best,

Charmaine Y. Colston

> On Sep 21, 2026, at 6:33 PM, charmaine colston <charmaineycolston@gmail.com> wrote:
>
> Thank you! Confirmed!
>
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<DOC092126-09212026144227.pdf>

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From: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: charmaine colston <charmaineycolston@gmail.com>, "truekingfile@gmail.com" <truekingfile@gmail.com>, Randall Serrett <Randall.Serrett.DCFS@la.gov>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Wed, 7 Oct 2026 15:47:31 +0000
Subject: Re: King 2021-2773
Ms. Verzwyvelt,
Yes, I do represent Ms. Colston and my apologies for the confusion. As she is getting conflicting information and this process is very frustrating for her. Moving forward we will not have this issue. Thank you.

Sincerely,
Orelia Lawdins-Trent , J. D., M. S.
Attorney . Certified Mediator

500 Broad Street, Suite 214
Mail to: P. O. Box 16351 (70616)
Lake Charles, LA 70601
Phone: 337.275.5124
Fax: 337.275.5125

CONFIDENTIALITY MESSAGE

Privileged:

This email contains PRIVILEGED and CONFIDENTIAL information intended only for the use of the specific individual or entity named above. If you or your employer is not the intended recipient of this e-mail or an employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any unauthorized dissemination or copying of this e-mail is strictly prohibited. If you have received this transmission in error, please immediately delete the message and contact the sender at 337-275-5124. **Please consider the environment before printing this e-mail.**

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<DOC092126-09212026144227.pdf>

---------- Forwarded message ----------
From: True King <truekingfile@gmail.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Mon, 5 Oct 2026 10:36:15 -0400
Subject: Re: King 2021-2773

Subject: Request for Clarification Regarding Pauper Status, Duplicate Costs, Outstanding Orders, and Need for Emergency Relief

Good morning,

The filings at issue are **pauper filings that should not be held for costs**, and several appear to be repetitive of matters for which relief has already been granted or remains pending.

Specifically:

1. **Order to Show Cause concerning Orelia Lawdins;**
2. **Order to Show Cause concerning Charmaine Colston;**
3. **A pending hearing concerning the exceptions, together with an existing court order that remains uncured;** and
4. **Additional orders previously granted through the ordinary judicial process and with due process afforded.**

Again, this is a **pauper proceeding in a matter that has not reached final judgment**, yet multiple and seemingly duplicative court costs have been assessed across more than ten pleadings.

The supervisory writ record has already addressed Mr. King's pauper status and determined that the status could not simply be rescinded while matters subject to the appellate proceedings remained unresolved. I therefore respectfully request clarification as to why additional filing costs continue to be assessed against pleadings submitted under pauper status and whether those assessments are consistent with the appellate ruling and the current procedural posture of the case.

It also appears that **Ms. Colston has submitted pleadings under pauper status and that her application was accepted by the Court**. If so, I respectfully request that the same procedural standards be applied consistently to both parties.

At this point, I am requesting guidance as to whether an application for a **temporary restraining order or other emergency protective relief** is necessary to preserve the status quo and prevent further prejudice while these procedural and due-process issues remain unresolved, or whether **Judge Redd will first be made aware of these outstanding matters so they may be addressed without further escalation**.

My intent is to obtain compliance with the existing orders, preserve the appellate rulings already entered, and ensure that the pending matters receive a fair and orderly resolution.

Please advise how the Court intends to proceed.

Respectfully,

John C King Sr.

On Mon, Oct 5, 2026 at 10:23 AM Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

> Please always copy Ms. Lawdins when you email the Judge's office. I have included her herein.

I checked the clerk of court's website, and apparently your documents are being held for costs, and they have not yet been sent to the Judge's office.

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Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

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337-437-3645

337-437-3363, Ext. 47

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From: True King <truekingfile@gmail.com>
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To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: True King <truekingfile@gmail.com>
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Written correspondence remains possible and is the appropriate means for addressing these matters while the jurisdictional and medical issues remain unresolved.

2. Express Relinquishment of Custody, Contact, Visitation, and Pursuit of Parental Relationship

I am expressly placing into the record that I do not seek custody, visitation, reunification, communication, or contact with the remaining minor child.

As set forth more fully in the attached pleading, I am also willing to voluntarily surrender all parental rights necessary to permit a lawful adoption proceeding if Ms. Colston wishes to have her present spouse or another legally qualified person adopt the remaining minor child.

I will not pursue future visitation or communication through this docket if a lawful permanent resolution can be reached.

3. John King, Jr. – Emancipation

John King, Jr. has reached age seventeen.

To the extent Louisiana law permits him to pursue judicial emancipation and he independently elects to do so, I will not oppose that request and am willing to provide any lawful parental consent required from me.

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4. Jayla E. King Has Reached Majority

Jayla E. King is now eighteen years old.

She is no longer a minor for purposes of ordinary custody and visitation proceedings. She is presently a freshman in college, lives on campus, and receives financial aid.

Accordingly, the Court should identify whether any presently scheduled custody, visitation, or parental-access issue purports to concern Jayla and, if so, the legal basis for continuing that issue after she reached majority.

5. Remaining Minor Child – Jakai King

Jakai King is the only remaining young minor child implicated by the present family-court proceedings.

His financial-support obligations are administered through Louisiana DCFS and enforced interstate through New Jersey.

There is therefore a fundamental question that must be answered before discovery and trial preparation continue:

What specific custody, visitation, support, contempt, enforcement, attorney-fee, or other controversy concerning Jakai remains for trial?

If support is being administered through the existing support-enforcement system and I am not seeking custody, visitation, reunification, or contact, the Court should identify what substantive parental dispute remains.

6. Court Must Identify the Undefined "Matters" Before Requiring Discovery

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That information is necessary before meaningful discovery can occur.

Without knowing the operative claims, I cannot determine:

- what discovery is relevant;
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I am specifically requesting a written response identifying:

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Pro Se
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---------- Forwarded message ----------
From: True King <truekingfile@gmail.com>
To: undisclosed-recipients:;
Cc:
Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch <mpitsch@14jdc.org>, sgould@14jdcfjc.org
Date: Mon, 5 Oct 2026 16:17:34 -0400
Subject: NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ

Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch, sgould@14jdcfjc.org

October 5, 2026

To: Louisiana Legislative Auditor – Investigations Division
CC: Louisiana Department of Justice / Attorney General – Constituent Services and Special Investigations
Re: URGENT REQUEST FOR IMMEDIATE INTERVENTION AND INDEPENDENT REVIEW – CALCASIEU PARISH CLERK OF COURT – KING v. COLSTON, 14th JDC No. 2021-2773

Dear Sir or Madam:

I respectfully submit the enclosed materials and request **immediate independent intervention and review** concerning the handling of my filings by the Calcasieu Parish Clerk of Court in **King v. Colston, Fourteenth Judicial District Court, Docket No. 2021-2773, Division A**.

On September 22, 2026, I submitted a verified motion expressly directing the Clerk to file the pleading into the record and present it to the Honorable W. Mitchell Redd, or the properly assigned or ad hoc judge, for judicial consideration. King Motion 2773 That filing requested, among other relief, identification of unresolved motions and Rules to Show Cause, suspension or extension of discovery deadlines, clarification of the issues remaining for trial, and preservation of state and federal rights. King Motion 2773

On October 5, 2026, Judge Redd's office advised me in writing that the Clerk's records showed my documents were **"being held for costs" and had not been sent to the Judge's office**. The effect is that the Clerk's administrative handling is preventing the assigned judge from even receiving and considering a motion that specifically asks the Court to address unresolved judicial matters.

This is especially concerning because the September 22 filing expressly preserved objections involving **unresolved motions, the pending Rule to Show Cause, due process, discovery, attorney fees, costs, appellate remedies, and federal remedies**. King Motion 2773 The filing also asks the Court to

determine the status of an unresolved Rule to Show Cause and other pending matters before the parties are required to incur additional discovery and litigation expense. King Motion 2773

The enclosed records further reflect that Orders to Show Cause concerning **Orelia Lawdins** and **Charmaine Colston** were previously issued and set for hearing. My present request is substantially directed toward obtaining judicial action on matters that have already been placed before the Court, rather than repeatedly filing duplicative pleadings merely to obtain a reset or ruling.

I contend that I am proceeding under an operative pauper privilege and that requiring advance costs as a condition to filing, docketing, routing, or transmitting an otherwise proper pleading raises serious concerns under **La. C.C.P. arts. 5181, 5184, and 5185**. I am not asking your office to decide the merits of the underlying domestic litigation. I am asking for review of whether administrative cost practices are being used in a manner that improperly obstructs access to judicial consideration.

I am also concerned because this incident does not arise in isolation. I have previously complained about substantial delays in the processing and routing of my filings, unequal treatment in scheduling and administrative access, and the handling of matters involving opposing counsel and court staff. I have related federal civil-rights litigation and have previously placed court personnel on notice of due-process, disability-access, and retaliation concerns. For that reason, the present withholding of my filing warrants an **independent review rather than review solely by the same office whose conduct is being challenged**.

I am **not asking your office to presume retaliation or intentional misconduct** from the present facts alone. I am requesting an investigation sufficient to determine:

1. why the September 22, 2026 filing was placed on a cost hold;
2. the exact amount and legal basis of the costs allegedly due;
3. whether my pauper status was ever lawfully rescinded or expired;

---------- Forwarded message ----------
From: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
To: charmaine colston <charmaineycolston@gmail.com>, "truekingfile@gmail.com" <truekingfile@gmail.com>, Randall Serrett <randall.serrett.dcfs@la.gov>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>, Orelia Lawdins <Orelial@gallienlawdins.com>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Wed, 7 Oct 2026 15:24:01 +0000
Subject: RE: King 2021-2773

Ms. Colston, you must always include Mr. King in your communications with the Court. I have cc'd him herein. Also, if the State is still involved, Mr. Serrett must be included as well. I have also cc'd him herein.

Ms. Lawdins, are you still representing Ms. Colston? I am asking because when a party is represented by an attorney, we normally communicate only with the attorney. Please let me know.

We are in the process of determining exactly what is set and will let all parties know.

Rhonda Verzwyvelt

Paralegal to

Judge W. Mitchell Redd

14th JDC, Family Court

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

From: charmaine colston <charmaineycolston@gmail.com>
Sent: Wednesday, October 7, 2026 10:16 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>; Orelia Lawdins <Orelial@gallienlawdins.com>; Jodi Harlow <jharlow@14jdcfjc.org>
Subject: Re: King 2021-2773

Good morning,

I am requesting clarification regarding the upcoming January court dates.

DCFS contacted me today and advised that the NCP privately filed a 42-page modification and that the January court dates are related to that filing.

This was the first time I was made aware of the modification, as I was under the impression that the January dates were scheduled in connection with the pending contempt matter.

Could you please clarify exactly what matters are scheduled to be heard in January?

Specifically, I would like to know whether the January dates are for the NCP's modification, the contempt matter, or both.

Thank you for your clarification.

Best,

Charmaine Y. Colston

> On Sep 21, 2026, at 6:33 PM, charmaine colston <charmaineycolston@gmail.com> wrote:
>
> Thank you! Confirmed!
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> > On Sep 21, 2026, at 2:50 PM, Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:
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> > *Fax – 337-437-3390*
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> > <DOC092126-09212026144227.pdf>

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To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: charmaine colston <charmaineycolston@gmail.com>, "truekingfile@gmail.com" <truekingfile@gmail.com>, Randall Serrett <Randall.Serrett.DCFS@la.gov>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Wed, 7 Oct 2026 15:47:31 +0000
Subject: Re: King 2021-2773
Ms. Verzwyvelt,
Yes, I do represent Ms. Colston and my apologies for the confusion. As she is getting conflicting information and this process is very frustrating for her. Moving forward we will not have this issue. Thank you.

Sincerely,
Orelia Lawdins-Trent , J. D., M. S.
Attorney . Certified Mediator

500 Broad Street, Suite 214
Mail to: P. O. Box 16351 (70616)
Lake Charles, LA 70601
Phone: 337.275.5124
Fax: 337.275.5125

CONFIDENTIALITY MESSAGE

Privileged:

This email contains PRIVILEGED and CONFIDENTIAL information intended only for the use of the specific individual or entity named above. If you or your employer is not the intended recipient of this e-mail or an employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any unauthorized dissemination or copying of this e-mail is strictly prohibited. If you have received this transmission in error, please immediately delete the message and contact the sender at 337-275-5124. **Please consider the environment before printing this e-mail.**

On Oct 7, 2026, at 10:24 AM, Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

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From: True King <truekingfile@gmail.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: Orelia Lawdins-Trent <Orelial@lawdinslaw.com>, Jodi Harlow <jharlow@14jdcfjc.org>
Bcc:
Date: Mon, 5 Oct 2026 10:36:15 -0400
Subject: Re: King 2021-2773

Subject: Request for Clarification Regarding Pauper Status, Duplicate Costs, Outstanding Orders, and Need for Emergency Relief

Good morning,

The filings at issue are **pauper filings that should not be held for costs**, and several appear to be repetitive of matters for which relief has already been granted or remains pending.

Specifically:

1. **Order to Show Cause concerning Orelia Lawdins;**
2. **Order to Show Cause concerning Charmaine Colston;**
3. **A pending hearing concerning the exceptions, together with an existing court order that remains uncured;** and
4. **Additional orders previously granted through the ordinary judicial process and with due process afforded.**

Again, this is a **pauper proceeding in a matter that has not reached final judgment**, yet multiple and seemingly duplicative court costs have been assessed across more than ten pleadings.

The supervisory writ record has already addressed Mr. King's pauper status and determined that the status could not simply be rescinded while matters subject to the appellate proceedings remained unresolved. I therefore respectfully request clarification as to why additional filing costs continue to be assessed against pleadings submitted under pauper status and whether those assessments are consistent with the appellate ruling and the current procedural posture of the case.

It also appears that **Ms. Colston has submitted pleadings under pauper status and that her application was accepted by the Court**. If so, I respectfully request that the same procedural standards be applied consistently to both parties.

At this point, I am requesting guidance as to whether an application for a **temporary restraining order or other emergency protective relief** is necessary to preserve the status quo and prevent further prejudice while these procedural and due-process issues remain unresolved, or whether **Judge Redd will first be made aware of these outstanding matters so they may be addressed without further escalation**.

My intent is to obtain compliance with the existing orders, preserve the appellate rulings already entered, and ensure that the pending matters receive a fair and orderly resolution.

Please advise how the Court intends to proceed.

Respectfully,

John C King Sr.

On Mon, Oct 5, 2026 at 10:23 AM Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

> Please always copy Ms. Lawdins when you email the Judge's office. I have included her herein.
>
> I checked the clerk of court's website, and apparently your documents are being held for costs, and they have not yet been sent to the Judge's office.
>
> Thanks.
>
> *Rhonda Verzwyvelt*
>
> *Paralegal to*
>
> *Judge W. Mitchell Redd*
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> *337-437-3363, Ext. 47*
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> *Fax – 337-437-3390*

From: True King <truekingfile@gmail.com>
Sent: Friday, October 2, 2026 8:09 AM
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: True King <truekingfile@gmail.com>
Subject: Re: King 2021-2773

Mrs Verzwyvelt,

I was instructed to reach out in regards to if my motions have been signed or if there needs to be an investigation into the clerks office as currently the are charges filed for intentional delays and misconduct. The motion were filed and stamped September 22, 2026 and since you're "requiring" discovery due next month an objection would need to be escalated for a federal injunction to pause proceedings if the discrimination is unethical on face value. I. E. Motions being held to prevent due process.

Research has been following the number of days it requires to get my motions signed since 2021 vs Lawdins- Trent in regards to my gender and racial discrimination claims. Before including this incident in the charges the federal clerk would like to know if Judge Redd is receiving the correspondence, or is justice being denied by the clerks office.

Please respond today so counsel can know who the charges should be directed towards the 14th JDC or the county clerks for these repeated oversights.

It appears responses happen same day when Colston calls Judge Redd office yet some of my motions were held over 109 days in one instance.

Please advise if Judge Redd is aware of this discrepancy so that the appropriate charges are assigned to the appropriate defendants.

Thank You

John King

On Tue, Sep 22, 2026 at 1:51 PM True King <truekingfile@gmail.com> wrote:

> Ms. Verzwyvelt,
>
> Please find attached the motions and related filing submitted into the record in King v. Colston, No. 2021-2773.
>
> Please also treat this correspondence and the attached pleadings as electronic service upon the parties to the extent permitted by the Court's September 21, 2026 correspondence and pretrial order, which requested confirmation of receipt and acceptance of notice by email in lieu of formal service.
>
> The Court's order specifically invited the parties to notify the Court of matters requiring immediate attention or assistance toward resolution. I am therefore requesting immediate written clarification and judicial attention to the following matters before discovery deadlines continue to run or additional pretrial and trial proceedings occur.
>
> **1. Interstate Proceedings and Existing New Jersey Orders**
>
> There are ongoing proceedings and orders involving New Jersey that concern the same parties and overlapping subject matter.
>
> The Court should determine, before proceeding further, which issues remain within Louisiana's jurisdiction and which issues have already been addressed through New Jersey interstate enforcement proceedings.
>
> I have also provided notice of New Jersey medical injunctive relief concerning participation in proceedings that have caused or aggravated serious neurological symptoms. The operative language and effect of those New Jersey orders should be reviewed before requiring further participation inconsistent with their terms.
>
> Written correspondence remains possible and is the appropriate means for addressing these matters while the jurisdictional and medical issues remain unresolved.
>
> **2. Express Relinquishment of Custody, Contact, Visitation, and Pursuit of Parental Relationship**
>
> I am expressly placing into the record that I do not seek custody, visitation, reunification, communication, or contact with the remaining minor child.
>
> As set forth more fully in the attached pleading, I am also willing to voluntarily surrender all parental rights necessary to permit a lawful adoption proceeding if Ms. Colston wishes to have her present spouse or another legally qualified person adopt the remaining minor child.
>
> I will not pursue future visitation or communication through this docket if a lawful permanent resolution can be reached.
>
> **3. John King, Jr. – Emancipation**
>
> John King, Jr. has reached age seventeen.
>
> To the extent Louisiana law permits him to pursue judicial emancipation and he independently elects to do so, I will not oppose that request and am willing to provide any lawful parental consent required from me.
>
> This should be distinguished from my separate request concerning voluntary surrender for adoption of the remaining minor child.
>
> **4. Jayla E. King Has Reached Majority**
>
> Jayla E. King is now eighteen years old.
>
> She is no longer a minor for purposes of ordinary custody and visitation proceedings. She is presently a freshman in college, lives on campus, and receives financial aid.

Accordingly, the Court should identify whether any presently scheduled custody, visitation, or parental-access issue purports to concern Jayla and, if so, the legal basis for continuing that issue after she reached majority.

5. Remaining Minor Child – Jakai King

Jakai King is the only remaining young minor child implicated by the present family-court proceedings.

His financial-support obligations are administered through Louisiana DCFS and enforced interstate through New Jersey.

There is therefore a fundamental question that must be answered before discovery and trial preparation continue:

What specific custody, visitation, support, contempt, enforcement, attorney-fee, or other controversy concerning Jakai remains for trial?

If support is being administered through the existing support-enforcement system and I am not seeking custody, visitation, reunification, or contact, the Court should identify what substantive parental dispute remains.

6. Court Must Identify the Undefined "Matters" Before Requiring Discovery

The current pretrial order refers generally to a trial and imposes deadlines, but I still have not been provided a specific identification of the claims or "matters" that remain for adjudication.

That information is necessary before meaningful discovery can occur.

Without knowing the operative claims, I cannot determine:

- what discovery is relevant;
- what documents are necessary;
- what witnesses must be identified or subpoenaed;
- what interstate records are required;
- what defenses must be prepared;
- what legal research is necessary; or
- the scope and financial cost of representation necessary for counsel.

The attached filing therefore formally requests that the Court identify the operative pleadings and every issue presently designated for trial before requiring completion of discovery.

7. Request for Permanent Finality and No Contact

Ms. Colston has repeatedly stated in pleadings and recorded proceedings that I should not have contact with the children.

I am prepared to provide the permanent separation she has repeatedly requested through a lawful final order.

If legally permissible, I request a permanent arrangement under which I relinquish the pursuit of custody, visitation, and contact and, where a qualifying adoption is pursued, voluntarily surrender the parental rights necessary for that adoption.

My immediate family likewise seeks permanent separation from unnecessary interaction with Ms. Colston.

Subject to lawful court approval, I am willing to agree that neither I nor members of the Guillory/King family will initiate contact with Jakai King before he reaches majority or is otherwise legally emancipated, and that we will maintain a distance of at least fifty feet absent an emergency, a lawful court directive, or another circumstance expressly authorized by law.

In exchange for this permanent separation, I ask the Court to determine whether reciprocal no-contact and anti-harassment relief can be entered prohibiting unnecessary contact with me, my spouse, my mother, my brothers, employers, educational institutions, and other immediate family members.

The purpose is simple: **permanent finality and an end to unnecessary interaction between the households.**

8. Existing Rule to Show Cause

There is already a signed Rule or Order to Show Cause in the record that remains unresolved.

Please advise in writing:

1. whether that Rule remains pending;
2. when it will be heard;
3. what issues it encompasses;
4. whether it will be resolved before the newly scheduled pretrial and trial proceedings; and
5. why additional proceedings are being scheduled before that signed Rule is addressed.

9. Request to Determine Whether Any Merits Trial Remains Necessary

Because:

- Jayla is eighteen;
- John King, Jr. is seventeen and nearing completion of high school;
- Jakai is the only remaining young minor child;
- I am not seeking custody or visitation;
- I am willing to voluntarily surrender parental rights necessary for lawful adoption;
- support is already subject to interstate administration and enforcement; and
- a Rule to Show Cause remains unresolved,

I respectfully request that the Court state in writing what remaining controversy requires a merits trial.

If there is no remaining custody or visitation dispute and the support issues are being administered through the appropriate state agencies, I request that the Court advise whether the remaining matters can be dismissed, resolved through the already-pending Rule to Show Cause, or reduced to a final order providing permanent closure.

10. Preservation of Rights

Nothing in this correspondence waives any previously asserted objection concerning service, notice, interstate jurisdiction, recusal, unresolved motions, discovery, due process, appellate review, federal proceedings, medical accommodations, or existing New Jersey orders.

Please place this correspondence and the attached filing into the record and provide them to Judge Redd before any discovery deadline or further substantive proceeding occurs.

I am specifically requesting a written response identifying:

the exact pleadings, claims, and matters that remain before the Court and the legal or procedural basis upon which the January trial is presently being scheduled.

Thank you,

John C. J. King, Sr.
Pro Se
Case No. 2021-2773

All rights and objections under applicable state and federal law are expressly reserved.

ENCLOSURE: MOTIONS AND EXHIBITS FILED WITH CALCASIEU CLERK OF COURT

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- what legal research is necessary; or
- the scope and financial cost of representation necessary for counsel.

The attached filing therefore formally requests that the Court identify the operative pleadings and every issue presently designated for trial before requiring completion of discovery.

7. Request for Permanent Finality and No Contact

Ms. Colston has repeatedly stated in pleadings and recorded proceedings that I should not have contact with the children.

I am prepared to provide the permanent separation she has repeatedly requested through a lawful final order.

If legally permissible, I request a permanent arrangement under which I relinquish the pursuit of custody, visitation, and contact and, where a qualifying adoption is pursued, voluntarily surrender the parental rights necessary for that adoption.

My immediate family likewise seeks permanent separation from unnecessary interaction with Ms. Colston.

Subject to lawful court approval, I am willing to agree that neither I nor members of the Guillory/King family will initiate contact with Jakai King before he reaches majority or is otherwise legally emancipated, and that we will maintain a distance of at least fifty feet absent an emergency, a lawful court directive, or another circumstance expressly authorized by law.

In exchange for this permanent separation, I ask the Court to determine whether reciprocal no-contact and anti-harassment relief can be entered prohibiting unnecessary contact with me, my spouse, my mother, my brothers, employers, educational institutions, and other immediate family members.

The purpose is simple: **permanent finality and an end to unnecessary interaction between the households.**

8. Existing Rule to Show Cause

There is already a signed Rule or Order to Show Cause in the record that remains unresolved.

Please advise in writing:

1. whether that Rule remains pending;
2. when it will be heard;
3. what issues it encompasses;
4. whether it will be resolved before the newly scheduled pretrial and trial proceedings; and
5. why additional proceedings are being scheduled before that signed Rule is addressed.

9. Request to Determine Whether Any Merits Trial Remains Necessary

Because:

- Jayla is eighteen;
- John King, Jr. is seventeen and nearing completion of high school;
- Jakai is the only remaining young minor child;
- I am not seeking custody or visitation;
- I am willing to voluntarily surrender parental rights necessary for lawful adoption;
- support is already subject to interstate administration and enforcement; and
- a Rule to Show Cause remains unresolved,

I respectfully request that the Court state in writing what remaining controversy requires a merits trial.

If there is no remaining custody or visitation dispute and the support issues are being administered through the appropriate state agencies, I request that the Court advise whether the remaining matters can be dismissed, resolved through the already-pending Rule to Show Cause, or reduced to a final order providing permanent closure.

10. Preservation of Rights

Nothing in this correspondence waives any previously asserted objection concerning service, notice, interstate jurisdiction, recusal, unresolved motions, discovery, due process, appellate review, federal proceedings, medical accommodations, or existing New Jersey orders.

Please place this correspondence and the attached filing into the record and provide them to Judge Redd before any discovery deadline or further substantive proceeding occurs.

I am specifically requesting a written response identifying:

the exact pleadings, claims, and matters that remain before the Court and the legal or procedural basis upon which the January trial is presently being scheduled.

Thank you,

John C. J. King, Sr.
Pro Se
Case No. 2021-2773

All rights and objections under applicable state and federal law are expressly reserved.

ENCLOSURE: MOTIONS AND EXHIBITS FILED WITH CALCASIEU CLERK OF COURT

On Mon, Sep 21, 2026 at 3:50 PM Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org> wrote:

> All, attached is the new pre-trial order in the above matter. **Please carefully review and calendar all deadlines, as we have set a Zoom PTC prior to the trial**.
>
> Please also confirm receipt and that you accept notice via email in lieu of formal service. Thanks.
>
> *Rhonda Verzwyvelt*
>
> *Paralegal to*
>
> *Judge W. Mitchell Redd*
>
> *14th JDC, Family Court*
>
> *1000 Ryan Street, North Annex*
>
> *Lake Charles, LA 70601*
>
> *rverzwyvelt@14jdcfjc.org*
>
> *337-437-3645*
>
> *337-437-3363, Ext. 47*
>
> *Fax – 337-437-3390*

---------- Forwarded message ----------
From: True King <truekingfile@gmail.com>
To: Rhonda Verzwyvelt <rverzwyvelt@14jdcfjc.org>
Cc: True King <truekingfile@gmail.com>
Bcc:
Date: Fri, 2 Oct 2026 09:09:22 -0400
Subject: Re: King 2021-2773
Mrs Verzwyvelt,
I was instructed to reach out in regards to if my motions have been signed or if there needs to be an investigation into the clerks office as currently the are charges filed for intentional delays and misconduct. The motion were filed and stamped September 22, 2026 and since you're "requiring" discovery due next month an objection would need to be escalated for a federal injunction to pause proceedings if the discrimination is unethical on face value. I. E. Motions being held to prevent due process.

Research has been following the number of days it requires to get my motions signed since 2021 vs Lawdins- Trent in regards to my gender and racial discrimination claims. Before including this incident in the charges the federal clerk would like to know if Judge Redd is receiving the correspondence, or is justice being denied by the clerks office.

Please respond today so counsel can know who the charges should be directed towards the 14th JDC or the county clerks for these repeated oversights.
It appears responses happen same day when Colston calls Judge Redd office yet some of my motions were held over 109 days in one instance.
Please advise if Judge Redd is aware of this discrepancy so that the appropriate charges are assigned to the appropriate defendants.

Thank You
John King

On Tue, Sep 22, 2026 at 1:51 PM True King <truekingfile@gmail.com> wrote:

Ms. Verzwyvelt,

Please find attached the motions and related filing submitted into the record in King v. Colston, No. 2021-2773.

Please also treat this correspondence and the attached pleadings as electronic service upon the parties to the extent permitted by the Court's September 21, 2026 correspondence and pretrial order, which requested confirmation of receipt and acceptance of notice by email in lieu of formal service.

The Court's order specifically invited the parties to notify the Court of matters requiring immediate attention or assistance toward resolution. I am therefore requesting immediate written clarification and judicial attention to the following matters before discovery deadlines continue to run or additional pretrial and trial proceedings occur.

1. Interstate Proceedings and Existing New Jersey Orders

There are ongoing proceedings and orders involving New Jersey that concern the same parties and overlapping subject matter.

The Court should determine, before proceeding further, which issues remain within Louisiana's jurisdiction and which issues have already been addressed through New Jersey interstate enforcement proceedings.

I have also provided notice of New Jersey medical injunctive relief concerning participation in proceedings that have caused or aggravated serious neurological symptoms. The operative language and effect of those New Jersey orders should be reviewed before requiring further participation inconsistent with their terms.

Written correspondence remains possible and is the appropriate means for addressing these matters while the jurisdictional and medical issues remain unresolved.

2. Express Relinquishment of Custody, Contact, Visitation, and Pursuit of Parental Relationship

I am expressly placing into the record that I do not seek custody, visitation, reunification, communication, or contact with the remaining minor child.

As set forth more fully in the attached pleading, I am also willing to voluntarily surrender all parental rights necessary to permit a lawful adoption proceeding if Ms. Colston wishes to have her present spouse or another legally qualified person adopt the remaining minor child.

I will not pursue future visitation or communication through this docket if a lawful permanent resolution can be reached.

3. John King, Jr. – Emancipation

John King, Jr. has reached age seventeen.

To the extent Louisiana law permits him to pursue judicial emancipation and he independently elects to do so, I will not oppose that request and am willing to provide any lawful parental consent required from me.

This should be distinguished from my separate request concerning voluntary surrender for adoption of the remaining minor child.

4. Jayla E. King Has Reached Majority

Jayla E. King is now eighteen years old.

She is no longer a minor for purposes of ordinary custody and visitation proceedings. She is presently a freshman in college, lives on campus, and receives financial aid.

Accordingly, the Court should identify whether any presently scheduled custody, visitation, or parental-access issue purports to concern Jayla and, if so, the legal basis for continuing that issue after she reached majority.

5. Remaining Minor Child – Jakai King

Jakai King is the only remaining young minor child implicated by the present family-court proceedings.

His financial-support obligations are administered through Louisiana DCFS and enforced interstate through New Jersey.

There is therefore a fundamental question that must be answered before discovery and trial preparation continue:

What specific custody, visitation, support, contempt, enforcement, attorney-fee, or other controversy concerning Jakai remains for trial?

If support is being administered through the existing support-enforcement system and I am not seeking custody, visitation, reunification, or contact, the Court should identify what substantive parental dispute remains.

6. Court Must Identify the Undefined "Matters" Before Requiring Discovery

The current pretrial order refers generally to a trial and imposes deadlines, but I still have not been provided a specific identification of the claims or "matters" that remain for adjudication.

That information is necessary before meaningful discovery can occur.

Without knowing the operative claims, I cannot determine:

- what discovery is relevant;
- what documents are necessary;
- what witnesses must be identified or subpoenaed;
- what interstate records are required;
- what defenses must be prepared;
- what legal research is necessary; or
- the scope and financial cost of representation necessary for counsel.

The attached filing therefore formally requests that the Court identify the operative pleadings and every issue presently designated for trial before requiring completion of discovery.

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Thank you,

John C. J. King, Sr.
Pro Se
Case No. 2021-2773

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>
> Please also confirm receipt and that you accept notice via email in lieu of formal service. Thanks.
>
> *Rhonda Verzwyvelt*
>
> *Paralegal to*
>
> *Judge W. Mitchell Redd*
>
> *14th JDC, Family Court*

1000 Ryan Street, North Annex

Lake Charles, LA 70601

rverzwyvelt@14jdcfjc.org

337-437-3645

337-437-3363, Ext. 47

Fax – 337-437-3390

---------- Forwarded message ----------
From: True King <truekingfile@gmail.com>
To: undisclosed-recipients:;
Cc:
Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch <mpitsch@14jdc.org>, sgould@14jdcfjc.org
Date: Mon, 5 Oct 2026 16:17:34 -0400
Subject: NOTICE OF LITIGATION PRESERVATION / LOUISIANA BOARD OF ETHIC, FEDERAL DOJ

Bcc: mjordan@calclerkofcourt.com, lynnjones@calcasieuclerk.gov, Michelle Pitsch, sgould@14jdcfjc.org

October 5, 2026

To: Louisiana Legislative Auditor – Investigations Division
CC: Louisiana Department of Justice / Attorney General – Constituent Services and Special Investigations
Re: URGENT REQUEST FOR IMMEDIATE INTERVENTION AND INDEPENDENT REVIEW – CALCASIEU PARISH CLERK OF COURT – KING v. COLSTON, 14th JDC No. 2021-2773

Dear Sir or Madam:

I respectfully submit the enclosed materials and request **immediate independent intervention and review** concerning the handling of my filings by the Calcasieu Parish Clerk of Court in **King v. Colston, Fourteenth Judicial District Court, Docket No. 2021-2773, Division A**.

On September 22, 2026, I submitted a verified motion expressly directing the Clerk to file the pleading into the record and present it to the Honorable W. Mitchell Redd, or the properly assigned or ad hoc judge, for judicial consideration. King Motion 2773 That filing requested, among other relief, identification of unresolved motions and Rules to Show Cause, suspension or extension of discovery deadlines, clarification of the issues remaining for trial, and preservation of state and federal rights. King Motion 2773

On October 5, 2026, Judge Redd's office advised me in writing that the Clerk's records showed my documents were **"being held for costs" and had not been sent to the Judge's office**. The effect is that the Clerk's administrative handling is preventing the assigned judge from even receiving and considering a motion that specifically asks the Court to address unresolved judicial matters.

This is especially concerning because the September 22 filing expressly preserved objections involving **unresolved motions, the pending Rule to Show Cause, due process, discovery, attorney fees, costs, appellate remedies, and federal remedies**. King Motion 2773 The filing also asks the Court to determine the status of an unresolved Rule to Show Cause and other pending matters before the parties are required to incur additional discovery and litigation expense. King Motion 2773

The enclosed records further reflect that Orders to Show Cause concerning **Orelia Lawdins** and **Charmaine Colston** were previously issued and set for hearing. My present request is substantially directed toward obtaining judicial action on matters that have already been placed before the Court, rather than repeatedly filing duplicative pleadings merely to obtain a reset or ruling.

I contend that I am proceeding under an operative pauper privilege and that requiring advance costs as a condition to filing, docketing, routing, or transmitting an otherwise proper pleading raises serious concerns under **La. C.C.P. arts. 5181, 5184, and 5185**. I am not asking your office to decide the merits of the underlying domestic litigation. I am asking for review of whether administrative cost practices are being used in a manner that improperly obstructs access to judicial consideration.

I am also concerned because this incident does not arise in isolation. I have previously complained about substantial delays in the processing and routing of my filings, unequal treatment in scheduling and administrative access, and the handling of matters involving opposing counsel and court staff. I have related federal civil-rights litigation and have previously placed court personnel on notice of due-process, disability-access, and retaliation concerns. For that reason, the present withholding of my filing warrants an **independent review rather than review solely by the same office whose conduct is being challenged**.

I am **not asking your office to presume retaliation or intentional misconduct** from the present facts alone. I am requesting an investigation sufficient to determine:

1. why the September 22, 2026 filing was placed on a cost hold;
2. the exact amount and legal basis of the costs allegedly due;
3. whether my pauper status was ever lawfully rescinded or expired;
4. whether any traverse of pauper status was filed pursuant to La. C.C.P. art. 5184;
5. whether a contradictory hearing occurred before any change in pauper status;

...

[Message clipped] View entire message

11 attachments

King_Request_Immediate_Supervisory_Intervention_October_7_2026.pdf
89K

King 2021-2773 (5).eml
41K

King 2021-2773 (4).eml
43K

King 2021-2773 (3).eml
43K

King 2021-2773 (2).eml
68K

King 2021-2773 (1).eml
29K

26 grade A CLERK FILING 0905 14THjdc.pdf
9801K

Gmail - King 2021-2773.pdf
249K

NOTICE OF LITIGATION PRESERVATION _ LOUISIANA BOARD OF ETHIC, FEDERAL DOJ (1).eml
13774K

26 grade A CLERK FILING 0905 14THjdc.pdf
9801K

Gmail - King 2021-2773.pdf
249K

COST DISCREPANCY ANALYSIS
Lake Charles City Court

Category	Case No. 23-2124 King v. Amos	Case No. 23-1206 King v. Colston
Early 2024 Baseline Costs	February 23, 2024 certified copy request: $29.00 [1]	Routine filing and service fees only; no comparable escalation
November 14 and December 30, 2024 Activity	Approximately $5,000.00 imposed December 30, 2024 [2] $800.00 transcript charge [3]	No comparable single day cost spike
Service and Address Entries	Service fees entered at Iowa, Louisiana address under 'Shunte King' [4]	Standard service entries; no address irregularity reflected

Footnotes:

[1] February 23, 2024 entry: Request for certified copies, total cost $29.00.

[2] Cost ledger reflects approximately $5,000.00 assessed December 30, 2024 in Case No. 23-2124.

[3] Transcript preparation fee of $800.00 reflected in cost bill.

[4] Service entries reflect Iowa, Louisiana address not associated with domicile, raising equity concerns under La. C.C.P. art. 1920.

EXPANDED COST DISCREPANCY ANALYSIS WITH POST-DIVESTITURE TIMELINE
Lake Charles City Court

Category	**Case No. 23-2124** **King v. Amos**	**Case No. 23-1206** **King v. Colston**
Early 2024 Baseline Costs	Feb 23, 2024 certified copy request: $29.00 [1] Routine administrative pricing structure.	Routine filing and service fees only; no escalation.
Pre-November 2024 Hearing Records	Handwritten minute sheets; no high-volume transcript activity [2].	Standard small-claims-level entries.
November 14, 2024 Activity	Contempt proceedings initiated; transcript later billed at $800.00 [3].	No comparable cost concentration.
December 4, 2024	Appeal signed; jurisdiction transferred under La. C.C.P. art. 2088 [4].	No parallel post-appeal cost issue reflected.
December 30, 2024 (Post-Divestiture)	Approx. $5,000.00 imposed in single day [5]. Includes transcript and administrative entries. Occurred after appeal order.	No comparable single-day spike.
Service & Address Charges	Service entries at Iowa, Louisiana address under 'Shunte King' [6].	No address irregularity reflected.

Footnotes:

[1] February 23, 2024 entry: Certified petition and minute sheet totaling $29.00.

[2] Earlier hearings reflected minimal handwritten minute sheets.

[3] Transcript preparation fee of $800.00 assessed in connection with November 14 proceedings.

[4] La. C.C.P. art. 2088: Trial court divested of jurisdiction upon granting of appeal except for limited matters.

[5] Cost ledger reflects approximately $5,000.00 assessed December 30, 2024.

[6] Service entries reflect Iowa, Louisiana address not associated with domicile; equity concerns under La. C.C.P. art. 1920.

Suit No.: 23-2124

JOHN CLIFFORD J KING

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Cost Summary	
Deposits:	$1,793.00
Court Cost:	($1,276.70)
Refund:	$0.00
Balance:	$516.30

Date	***Minutes***			
8/24/2023	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS.	***Code:***	AC	***ServType:***
		Deposit:		
		Cost:	$0.00	***ServCost:***
8/24/2023	DEFAULT COURT COST	***Code:***	DCC	***ServType:***
		Deposit:		
		Cost:	$56.50	***ServCost:***
8/24/2023	CLAIM: DAMAGESAS PER FAX FILED PETITION (6PAGES); C/SUPPLEMENTAL REPORT(2); CPSO OFFENSE REPORT(4); CPSO CASE REPORT(4) C/WELD INSPECTION(7); C/SOUTHWEST CREDIT UNION DOCS(2); C/CAPITAL ONE(7); C/REGISTRATION(1); C/VEHICLE APPLICATION(1); CASE REPORT SUMMARY(1); C/CERTIFICATE OF TITLE(2); C/LICENSE(1); C/CASE SUMMARY(1) FILED HEREINPETITION (6PAGES) 1/CC 1/CONFEXHIBITS(33)FAX FILING FEE $5.00	***Code:***	CL	***ServType:***
		Deposit:		
		Cost:	$95.00	***ServCost:***

9/1/2023	CITATION ISSUED (RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 AT 1208 17TH STREET LAKE CHARLES LA, 70601)	***Code:***	CII	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
9/5/2023	ADDED DEPOSIT FROM JOHN KING OF $255.00 ADV DEP	***Code:***	PD	***ServType:***	
		Deposit:	$255.00		
		Cost:		***ServCost:***	
9/5/2023	2 COPIES OF THE PETITION 1 FOR SERVICE, 1 FOR PLT12 PAGES @ $2.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$24.00	***ServCost:***	
9/12/2023	DEFENDANT RENEE AMOS PEREMPTORY EXCEPTIONS OF PRESCRIPTION, RULE TO SHOW CAUSE, C/JUDGMENT OF DISMISSAL WITH PREJUDICE, C/CPSO SUPPLEMENTAL NARRATIVE /INITIAL REPORT, C/CPSO OFFENSE REPORT RECEIPT, AND C/CASE REPORT FILED HEREIN.**ORDER SIGNED BY JUDGE JAMIE B. BICE 9/13/2023**EXCEPTIONRULE1 AT $6 EACH9 AT $2 EACH1 CONFORMED COPY TO ATTY DOMINIC1 CC TO BE SERVED TO PLTF	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$44.00	***ServCost:***	
9/12/2023	ADDED DEPOSIT FROM KAMIE DOMINIC OF $150.00 ADD DEP FOR EXCEPTION	***Code:***	DD	***ServType:***	
		Deposit:	$150.00		
		Cost:		***ServCost:***	
9/20/2023	HEARING NOTICE OF EXCEPTION RULE SET FOR WEDNESDAY 11/15/2023 AT 9:00 AM MAILED TO DEFT ATTY., KAMIE T. DOMINIC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	

9/20/2023	RULE: EXCEPTION DATE: WEDNESDAY 11/15/2023 AT 9:00 AM	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	
9/20/2023	CITATION ORDER ISSUED TO: (KING, JOHN CLIFFORD J AT 123 N. LOUISIANA AVENUE LAKE CHARLES LA 70601) EXCEPTION	***Code:***	CIO	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
11/7/2023	FAX FILED MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/08/23.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
11/13/2023	RECEIVED ORIGINAL MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/16/23.MOTION/2CCDOCS/2EXHIBITS/6COPIES/18	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$76.00	***ServCost:***	
11/13/2023	CC / JOHN KINGADD DEP / FOR MOTIONS TO CONTINUE AND QUASH	***Code:***	PD	***ServType:***	
		Deposit:	$255.00		
		Cost:		***ServCost:***	
11/28/2023	HEARING NOTICE FOR EXCEPTION SET FOR WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM MAILED TO DEFENDANT, RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC.	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
11/28/2023	NOTICE OF MOTION FOR CONTINUANCE AND MOTION TO QUASH ISSUED TO: RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC AT 1400 RYAN ST., LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00

11/28/2023	RULE REFIXED: EXCEPTIONDATE: WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	
11/28/2023	CITATION ORDER ISSUED TO WITH C/MOTION FOR CONTINUANCE AND MOTION TO QUASH: JOHN CLIFFORD J KING AT 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601	***Code:***	CIO	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/4/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/5/2024	CC / JOHN KINGADD DEP / FOR FAX FILING FEE AND SUBPOENA	***Code:***	PD	***ServType:***	
		Deposit:	$55.00		
		Cost:		***ServCost:***	
1/5/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	***Code:***	SUB	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/16/2024	FAX FILED - MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	RULE: EXCEPTION (RE-FIXED)DATE: THURSDAY, JANUARY 25, 2024 @ 9:00 AM**2 NOTICES MAILED**	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	

1/17/2024	PLTF FAILS TO APPEAR; DEFT APPEARS W/ATTY; MOTION TO CONTINUE GRANTED; CONTINUED UNTIL 1/25/2024 @ 9:00 AM; NOTICE TO BE SENT TO BOTH PARTIES. RCR	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
1/17/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	***Code:***	SUB	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/19/2024	REQUEST FOR A COPY OF THE EXCEPTIONS FILED HEREIN BY DEF ATTY KAMIE T DOMINIC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
1/19/2024	1 COPY OF DEFENDANT PEREMPTORY EXECEPTIONS OF PRESCRIPTION4 PAGES @ $2.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	

1/19/2024	ADDED DEPOSIT FROM KAMIE T. DONINIC OF $14.00 ADD DEP/CF OF PEREMPTORY EXECEPTIONS	***Code:***	DD	***ServType:***	
		Deposit:	$14.00		
		Cost:		***ServCost:***	
1/22/2024	ADDED DEPOSIT FROM JOHN KING OF $80.00 /SUBPOENA	***Code:***	PD	***ServType:***	
		Deposit:	$80.00		
		Cost:		***ServCost:***	
1/22/2024	RECEIVED ORIGINAL LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.REQUESTDOC/1EXHIBIT/1	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$14.00	***ServCost:***	
1/23/2024	RECEIVED ORIGINAL MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE. **SIGNED BY JUDGE ** EXHIBIT ATTACHED (3 PAGES)MOTION/ORDEREXH - 3 PAGES	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$18.00	***ServCost:***	
1/23/2024	LETTER TO CONTEST COURT FEES FOR JANUARY 17, 2024 FILED HEREIN BY PLTF **BUT NOT SIGNED**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
1/24/2024	FAXED LETTER FILED HEREIN BY ATTY ORELIA R. LAWDINS-TRENT INFORMING THE COURT OF THE RECEIVED SERVICE OF A SUBP (ISSUED AT PLTF REQUEST) FOR CHARMAINE Y. COLSTON, AS THEY DO NOT REPRESENT MS. COLSTON IN THIS MATTER & SHE IS NOT A PARTY TO THIS PROCEEDING; SINCE OFFICE IMPROPERLY SERVED, HAS NOT FORWARDED TO MS. COLSTON; ADDITIONALLY CANNOT ASSUME ANY RESPONSIBILITY FOR HER APPEARANCE OR REQUIRE HER PRESENCE AT ANY HEARINGS IN THIS MATTER	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	

1/25/2024	PLTF APPEARS THRU ATTY, DUSTAN ABSHIRE; DEFT APPEARS WITH ATTY, KAMIE DOMINIC; PRE-TRIAL CONFERENCE HELD; DUSTAN ABSHIRE APPEARS TODAY FOR THE LIMITED PURPOSE OF THIS EXCEPTION HEARING; ARGUMENT AND INFORMATION GIVEN; EXCEPTION REQUEST IS OVERRULED; OBJECTION TO RULING NOTED FOR THE RECORD; MATTER SET FOR TRIAL ON THURSDAY, MARCH 21, 2024 AT 9:00 AM; NOTICE GIVEN IN OPEN COURT AND TO BE MAILED. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $7.00	***ServType:*** ***ServCost:***	
2/7/2024	NOTICE OF ANSWER FILED HEREIN BY DEFENDANT RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 ISSUED TO PLTF JOHN KING, 123 N LOUISIANA AVENUE, LAKE CHARLES, LA 70601	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00	***ServType:*** MF3 ***ServCost:***	$30.00	
2/7/2024	ANSWER FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; FAX: 337-426-8763; *CERTIFICATE OF SERVICE*ANSWER (2 PAGES)/1CC	***Code:*** JF ***Deposit:*** ***Cost:*** $13.00	***ServType:*** ***ServCost:***		
2/8/2024	ADDED DEPOSIT FROM KAMIE DOMINIC FOR ANSWER OF $25.00	***Code:*** DD ***Deposit:*** $25.00 ***Cost:***	***ServType:*** ***ServCost:***		
2/23/2024	REQUEST FOR CERTIFIED COPIES RECEIVED BY CHARMAINE COLSTON. **NOTIFIED COST FOR CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00 PLUS REQ. $6.00 TOTAL AMT. REQUIRED - $29.00**	***Code:*** NO ***Deposit:*** ***Cost:*** $0.00	***ServType:*** ***ServCost:***		
2/27/2024	REQUEST FOR CERTIFIED COPIES FILED HEREIN BY CHARMAINE COLSTON.	***Code:*** JF ***Deposit:*** ***Cost:*** $6.00	***ServType:*** ***ServCost:***		

2/27/2024	CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$23.00	***ServCost:***	
2/27/2024	ADDED DEPOSIT FROM CREDIT CARD/CHARMAINE COLSTON FOR CERTIFIED COPIES OF $29.00	***Code:***	TPD	***ServType:***	
		Deposit:	$29.00		
		Cost:		***ServCost:***	
3/7/2024	TRIAL FIXED FOR THURSDAY, MARCH 21, 2024 @ 9:00 AM; 2 NOTICES MAILED.	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	
3/7/2024	FAX FILED - REQUEST FOR SUBPOENA W/ATTACHED WITNESS SUBP. ACKNOWLEDGEMENT FORM FILED HEREIN BY PLTF IN PROPER PERSON. **REQUEST TO SERVE ATTY ORELIA LAWDINS-TRENT C/O HER CLIENT CHARMAINE COLSTON, LAWDINS GALLIEN FIRM, 1504 MARTIN LUTHER KING HWY STE A, LAKE CHARLES, LA 70601**FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$7.36	***ServCost:***	
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$7.36	***ServCost:***	

3/11/2024	**PER JUDGE RICHARD - DISREGARD PLTFS REQUEST FOR SUBP TO BE SERVED TO ATTY ORELIA LAWDINS TRENT C/O HER CLIENT CHARMAINE Y. COLSTON - REFER TO ATTY ORELIA LAWDINS-TRENTS LETTER FILED INTO THE RECORD ON 1/24/2024 WHEREIN SHE ADVISED THE COURT SHE IS NOT THE ATTY OF RECORD FOR MS. COLSTON, AS SHE IS NOT A PARTY IN THIS MATTER**	***Code:*** NO ***Deposit:*** ***Cost:*** $0.00	***ServType:*** ***ServCost:***	
3/19/2024	MOTION TO CONTINUE (2 PAGES); ORDER TO REFIX TRIAL FILED HEREIN BY DEFT THRU ATTY KAMIE T. DOMINIC **PLTF OPPOSES**MOTION (2 PAGES)/ORDER/2CC	***Code:*** JF ***Deposit:*** ***Cost:*** $24.00	***ServType:*** ***ServCost:***		
3/19/2024	ADDED DEPOSIT FROM KAMIE TRAMAIN DOMINIC OF $100.00	***Code:*** DD ***Deposit:*** $100.00 ***Cost:***	***ServType:*** ***ServCost:***		
3/21/2024	TRIAL RE-FIXED DATE: WEDNESDAY, MAY 8, 2024 AT 9:00**NOTICE GIVEN IN OPEN COURT***	***Code:*** JF ***Deposit:*** ***Cost:*** $8.00	***ServType:*** ***ServCost:***		
3/21/2024	PLTF APPEARS W/ATTY DUSTAN ABSHIRE; DEFT APPEARS W/ATTYS KAMIE DOMINIC & ED BAUMAN; FTR, OBJECTION TO THE MOTION TO CONTINUE BY PLTF ATTY DUSTAN ABSHIRE, REQUEST DENIED; MOTION TO CONTINUE BY DEFT ATTY KAMIE DOMINIC GRANTED & SIGNED IN OPEN COURT; TRIAL SET FOR WEDNESDAY, MAY 8, 2024 AT 9:00 AM; PLTF ATTY REQUESTS ZOOM COURT FOR MR. KING, REQUEST DENIED; NOTICE GIVEN TO ALL PARTIES IN OPEN COURT. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $5.00	***ServType:*** ***ServCost:***		
3/25/2024	NOTICE OF MOTION & ORDER TO CONTINUE & REFIX TRIAL ISSUED TO: (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00	***ServType:*** MF3 ***ServCost:***	$30.00	

4/25/2024	MOTION TO RECONSIDER DEFENDANT RENEE AMOS PEREMPTORY EXCEPTION OF PRESCRIPTION; MEMORANDUM IN SUPPORT OF MOTION TO RECONSIDER DEFT PEREMPTORY EXCEPTION (3 PAGES); EXH A (2 PAGES) FILED HEREIN BY DEFT THRU ATTY KAMIE DOMINIC.MOTION/MEMO (3 PAGES)/CC1 EXH (2 PAGES)	***Code:*** JF ***Deposit:*** ***Cost:*** $25.00		***ServType:*** ***ServCost:***	
4/25/2024	NOTICE OF MOTION TO RECONSIDER DEFENDANTS PEREMPTORY EXCEPTION OF PRESCRIPTION ISSUED TO (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00		***ServType:*** MF3 ***ServCost:***	$30.00
4/25/2024	ADDED DEPOSIT FROM CREDIT CARD/KAMIE TRAMAIN DOMINIC FOR MOTION TO RECONSIDER DEFT EXCEPTION OF $100.00	***Code:*** DD ***Deposit:*** $100.00 ***Cost:***		***ServType:*** ***ServCost:***	
5/8/2024	PLTF APPEARS W/ATTY JOHN CLIFFORD J. KING; DEFT APPEARS W/ATY KAMIE DOMINIC; COURT GRANTS PLAINTIFF'S ORAL MOTION TO RESET HEARING AND TO AMEND PLEADINGS TO INCLUDE HARTFORD LIFE INSURANCE COMPANY; MATTER RE-FIXED UNTIL THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; NOTICES TO BE SENT TO ALL PARTIES. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $5.00		***ServType:*** ***ServCost:***	
5/15/2024	TRIAL RE-FIXED FOR THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; 2 NOTICES MAILED.	***Code:*** JF ***Deposit:*** ***Cost:*** $8.00		***ServType:*** ***ServCost:***	
5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY DUSTAN J. ABSHIRE, 334 KIRBY ST. LAKE CHARLES, LA 70601	***Code:*** PC ***Deposit:*** ***Cost:*** $5.04		***ServType:*** ***ServCost:***	

5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$5.04	***ServCost:***	
5/20/2024	FAX FILED - PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTFFAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
5/30/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $5.00	***Code:***	PD	***ServType:***	
		Deposit:	$5.00		
		Cost:		***ServCost:***	
5/31/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTF **UP FOR REVIEW ** DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/4/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD. CC TO PLTF ATTY DUSTAN ABSHIRE.	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
6/13/2024	SUPPLEMENTING PETITION (2 PAGES); ORDER; AFFIDAVIT AND COVER LETTER FILED HEREINPETITION (2 PAGES)/3CCDOCS/3	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$41.00	***ServCost:***	
6/13/2024	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS. **AMENDING PARAGRAPH 2 AND ADD DEFENDANT HARTFORD FIRE INSURANCE COMPANY**	***Code:***	AC	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	

6/13/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM OF $300.00 ADD DEP FOR SUPPLEMENTAL PETITION	***Code:***	PD	***ServType:***	
		Deposit:	$300.00		
		Cost:		***ServCost:***	
6/14/2024	CHECK REQUEST ID# 21090 FOR PREPAYMENT SERVICE FEE SUBMITTED TO COMPTROLLER	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (RENEE AMOS THRU ATTY: KAMIE T. DOMINIC AT 1400 RYAN ST. LAKE CHARLES LA, 70601)	***Code:***	CII	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (HARTFORD FIRE INSURANCE COMPANY THRU: LOUISIANA SECRETARY OF STATE AT 8585 ARCHIVES AVE BATON ROUGE LA, 70809)**MAILED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE** CK. NO. 038877 ISSUED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE	***Code:***	CII	***ServType:***	SF
		Deposit:			
		Cost:	$10.00	***ServCost:***	$40.40
6/17/2024	PREPAYMENT OF SERVICE FEE. CHECK #038725 PAID TO: SECRETARY OF STATES OFFICE	***Code:***	SF	***ServType:***	
		Deposit:			
		Cost:	$50.00	***ServCost:***	
6/18/2024	MOTION AND ORDER TO WITHDRAW DUSTAN J. ABSHIRE AS COUNSEL OF RECORD FOR PLTF, JOHN CLIFFORD J KING; ORDER SIGNED BY JUDGE RONALD C. RICHARD ON 6/20/2024; COPY OF LETTER W/EMAIL FILED HEREIN BY ATTY DUSTAN J. ABSHIRE. CERT OF SERVICE. COVER LETTER FILED. COPY TO ATTY ABSHIRE. COPY TO PLTF.CVR LTR/MOTION/ORDER/COPY2 EXH	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$25.00	***ServCost:***	

6/20/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM, LLC OF $25.00 ADD DEP MOTION& ORDER TO WITHDRAW AS COUNSEL OF RECORD	***Code:***	PD	***ServType:***	
		Deposit:	$25.00		
		Cost:		***ServCost:***	
6/21/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO PLTF, JOHN CLIFFORD J KING @ 123 N LOUISIANA AVE, LAKE CHARLES, LA 70601	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/24/2024	COPY OF PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.**THE ORIGINAL THAT WAS FILED 5/31/2024 ATTACHED TO THIS COPY FOR JUDGE RICHARDS REVIEW** DENIED DUE TO NO 3RD PARTY AFFIANT PROVIDED**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/27/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF HAS FAILED TO PROVIDE A THIRD PARTY AFFIANT. CC TO PLTF.ORDER/CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
7/3/2024	ANSWER FILED HEREIN BY DEFENDANT, HARTFORD FIRE INSURANCE COMPANY, THRU ATTY KAMIE T. DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; CERTIFICATE OF SERVICEANSWER (2 PAGES)	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	
7/3/2024	ADDED DEPOSIT FROM KAMIE DOMINIC OF $25.00 ADD DEP FOR ANSWER	***Code:***	PD	***ServType:***	
		Deposit:	$25.00		
		Cost:		***ServCost:***	
7/3/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $10.00	***Code:***	PD	***ServType:***	
		Deposit:	$10.00		
		Cost:		***ServCost:***	

7/9/2024	SPOKE TO DEFT ATTY KAMIE DOMINIC AND SHE CONFIRMED SHE EMAIL THE ANSWER TO JOHN KING; THEREFORE, IT DID NOT NEED TO BE SERVED	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
7/25/2024	AMENDING & SUPPLEMENTAL MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY DUSTAN J ABSHIRE & SIGNED BY JUDGE RONALD C. RICHARD ON 7/29/2024. CERT OF SERVICE. COVER LETTER FILED. CONF COPY TO ATTY ABSHIRE.CVR LTR/ORDER/COPY**CC MAILED TO PLTF; CC MAILED TO DEFT ATTY**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$15.00	***ServCost:***	
7/25/2024	ADDED DEPOSIT FROM DUSTIN J. ABSHIRE OF $15.00 ADD DEP/ MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD	***Code:***	PD	***ServType:***	
		Deposit:	$15.00		
		Cost:		***ServCost:***	
7/30/2024	FAX FILED -PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
8/2/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON ** UP FOR JUDGE REVIEW**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
8/13/2024	ORDER FOR PAUPER AFFIDAVIT SIGNED BY JUDGE RONALD C. RICHARD ON 8/13/2024 ** FROM THIS DATE PLTF WILL BE ALLOWED TO PROCEED IN PAUPER STATUS** NOTIFIED PLTF	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
10/31/2024	FAX FILED - MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	

10/31/2024	MOTION IN LIMINE TO EXCLUDE HEARSAY WITNESSES AND EVIDENCE (2 PAGES); ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION (2PGS)/ORDER/2CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$24.00	***ServCost:***	
10/31/2024	MOTION TO STRIKE & MOTION FOR SANCTIONS; ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION/ORDER/2CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$22.00	***ServCost:***	
10/31/2024	ANSWER TO AMENDED PETITION FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE T DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059ANSWER/1CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
10/31/2024	NOTICE OF ANSWER TO AMENDED PETITION ISSUED TO (KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601)	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	
10/31/2024	ADDED DEPOSIT FROM RENEE E OR PATRICK S AMOS OF $350.00 ADD DEP FOR AMENDED ANSWER. MOTION IN LIMINE & MOTION TO STRIKE	***Code:***	DD	***ServType:***	
		Deposit:	$350.00		
		Cost:		***ServCost:***	
11/1/2024	FAX FILED - DEFENDANTS OPPOSITION TO PLAINTIFFS MOTION TO CONTINUE & MOTION TO QUASH (3 PAGES); ORDER FAX FILED HEREIN BY DEFTS THRU ATTY KAMIE DOMINIC. CERT OF SERVICE. COVER LETTER.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION IN LIMINE	***Code:***	CIO	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	

11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION TO STRIKE & FOR SANCTIONS	***Code:***	CIO	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	

2A

JOHN CLIFFORD JOSEPH KING, SR.	:	14TH JUDICIAL DISTRICT COURT
VS. NO. 2021-002773, DIV. A	:	PARISH OF CALCASIEU
CHARMAINE COLSTON	:	STATE OF LOUISIANA
FILED: AUG 13 2021	:	DEPUTY CLERK

ORDER

The foregoing petition, prayer, affidavit, and premises considered:

IT IS ORDERED that the Defendant, CHARMAINE COLSTON, be served with a certified copy of this Petition with notice and citation.

IT IS FURTHER ORDERED that a Temporary Restraining Order is issued herein, without notice and without bond, restraining and enjoining CHARMAINE COLSTON from unnecessarily disturbing, harassing, stalking, or threatening JOHN CLIFFORD JOSEPH KING, SR. in any manner whatsoever, including, but not limited to, telephonic and electronic communications- such as text, email, and social media messaging.

IT IS FURTHER ORDERED that the Defendant, CHARMAINE COLSTON, appear before the Hearing Officer of this Honorable Court on the 4th day of October, 2021, at 9 o'clock A.M and show cause why: Via Zoom with Tom Shea.

A. The parties should not be awarded joint custody of the minor children, with Defendant being designated as the domiciliary parent and Petitioner having reasonable visitation, including the option to exercise additional visitation in Lake Charles during extended school holiday weekends pursuant to the Calcasieu Parish School Calendar and one week for vacation during the summer, all in accordance with the attached suggested Joint Custody Plan;

B. Petitioner should not be ordered to pay child support in an amount consistent with the Louisiana Child Support Guidelines, pursuant to Revised Statute 9:315 et seq.;

C. Petitioner should not be granted permission to claim the children as dependents for State and Federal income tax purposes every year; and

D. A preliminary injunction and, in due course, a permanent injunction, should not be issued enjoining and restraining CHARMAINE COLSTON, and her agents, from unnecessarily disturbing, harassing, stalking, or threatening JOHN CLIFFORD JOSEPH KING, SR. in any manner whatsoever, including, but not limited to, telephonic and electronic communications- such as text, email, and social media messaging.

THUS DONE AND SIGNED this 19th day of August, 2021 at Lake Charles, Louisiana.

JUDGE, 14TH JUDICIAL DISTRICT COURT

W. Mitchell Redd

CAL CLERK-FAMILY COUR
AUG 13 2021 PM3:00:55

CMS7820303
Filing Date: 08/13/2021 02:59 PM
Case Number: 2021-002773
Document Name: ORDER
Page Count: 1

Abshire Law Firm, L.L.C.

Dustan J. Abshire
Attorney at Law

June 13, 2024

Orelia R. Lawdins-Trent
1540 Martin Luther King Hwy., Ste. A
Lake Charles, LA 70601
{P.O. Box 16351 (70616)}
orelial@gallienlawdins.com

RE: John King, Sr.
Vs. No. 2021-2773 A
Charmaine Colston

Orelia,

Pursuant to the Stipulated Judgment drafted by your office, please see the below revisions:

- Reunification Counseling – remove "at his own cost". This was not stated on the record and is not in the transcript.
- Arrears – remove "as of March 29, 2023. This was not stated on the record and is not in the transcript.
- Child Support – remove "effective March 29, 2023". This was not stated on the record and is not in the transcript.
- Restraining Order – remove "United States" and replace with "Louisiana".
- Previously Ordered - Attorney fees, etc.(page 4) – remove the entire paragraph, as these matter will be discussed at the Hearing set for the contempt, and this was not stated on the record, and is not in the transcript.

Please review the above and address the revisions.

Sincerely,

Dustan J. Abshire
DJA/bnc
Enclosures

JOHN CLIFFORD JOSEPH KING, SR.	**DOCKET NO.: 2021002773, DIV.: A**
	14TH JUDICIAL DISTRICT COURT
VERSUS	**PARISH OF CALCASIEU**
CHARMAINE COLSTON	**STATE OF LOUISIANA**

STIPULATED JUDGMENT

The instant matter came before the court on March 26, 2024 pursuant to a trial setting pursuant to on an *Objection to a Hearing Officer Recommendation for Child Support and Child Custody*, filed on behalf of John Clifford Joseph King, Sr. and *Motion for Contempt and Fees*, filed on behalf of Charmaine Colston. Present before the court were John Clifford Joseph King, Sr., and his counsel of record, Dustan Abshire, and Charmaine Colston, and her counsels of record Orelia Lawdins-Trent and Corrie Gallien, also present was RANDALL P. SERRETT, Attorney for the State of Louisiana Department of Children and Family Services, Child Support Enforcement. After reviewing the pleadings of record, as well as hearing the stipulations of the parties hereto, which were recited in open court and assented to under oath, and finding the law in favor hereof; accordingly,

CUSTODY:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that **CHARMAINE COLSTON** is hereby awarded sole legal custody of the minor children Jayla Elizabeth King (D.O.B. 9/02/2009 John Clifford King, Jr. (D.O.B. 9/11/2009) and Jakai Bernard King (D.O.B. 11/29/2018).

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.**, shall undergo Reunification Counseling, at his cost, prior to any visitation occurring with the minor children.

IT IS FURTHER ORDERED that the Court shall order and/or appoint _____ as the Counselor responsible for Reunification Counseling. The Counselor's information is as follows:

ADDRESS: _____

_____

PHONE NUMBER: _____

ELECTRONIC MAIL: _____

IT IS FURTHER ORDERED that the Reunification Counselor shall make a recommendation about any visitation and/or future visitation **JOHN CLIFFORD JOSEPH KING, SR.,** may have with the minor children and provide a written report and recommendation to this Court prior to visitation occurring.

IT IS FURTHER ORDERED that any motion for a change in the custodial status shall require the application of the Bergeron Standard and that it is met before any change in the custodial status is granted.

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.,** shall sign any documents necessary for the minor children to obtain their passports.

COMMUNICATIONS:

IT IS FURTHER ORDERED that the minor children, namely, Jayln Elizabeth King (D.O.B. 9/02/2009, John Clifford King, Jr. (D.O.B. 9/11/2009), can communicate with **JOHN CLIFFORD JOSEPH KING, SR.,** through their own volition in whatever methods they agree to communicate within a reasonable time period. The children are old enough to determine the amount of communication they wish to engage.

IT IS FURTHER ORDERED that the minor children can be contacted via telephone at 337-485-7424. The communication shall not be harassing or excessive and shall be relative only to the children.

IT IS FURTHER ORDERED that the minor children can reach **JOHN CLIFFORD JOSEPH KING, SR.,** at 318-995-1705.

IT IS FURTHER ORDERED that **CHARMAINE COLSTON** shall provide the phone number of **JOHN CLIFFORD JOSEPH KING, SR.,** at 318-995-1705, to the minor children via text message within twenty-four (24) hours of March 26, 2024.

CHILD SUPPORT:

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.**, owes child support arears in the amount of $24,510.61 as of March 29, 2023. Payment of arears shall be paid in the manor prescribed by law, or any court of competent jurisdiction.

IT IS FURTHER ORDERED that Child Support will be maintained by the Department of Child and Family Services (DCFS), Support Enforcement, State of Louisiana, and/or any of its subsidiaries.

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.**, shall pay child support in the amount of $1,000.00 per month plus the 5% statutorily imposed administrative fee per month for a total of $1,050.00 payable to the State of Louisiana Department of Child and Family Services, Child Support Enforcement, effective March 29, 2023. Child Support payments will be made through the Department of Child and Family Services (DCFS), State of Louisiana in the prescribed method of payment as dictated and offered by the State. **JOHN CLIFFORD JOSEPH KING, SR.**, shall be responsible for any fees associated with payment through DCFS's payment system. The child support has been set in accordance with guidelines, the reason for the deviation is that **JOHN CLIFFORD JOSEPH KING, SR.**, purports that he is currently not working and/or unemployed.

COST:

IT IS FURTHER ORDERED that all cost will be assessed to _____, in this matter.

INJUNCTION/ RESTRAINING ORDER:

IT IS FURTHER ORDERED that a mutual restraining order against harassment remains in place and is hereby issued against both parties preventing them harassing the other in person, social media posting(s) or via electronic means.

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.**, attest that there is no Restraining Order (Temporary, Interim, Final or Permanent) against Charmaine Colston in any jurisdictions of these United States and/or its territories in place prohibiting, restraining or preventing any family member(s) or extended family member(s) from having contact with or contacting the minor children and/or Charmaine Colston and does not prohibit, restrain or prevent any visitation therefrom.

CONTEMPT:

IT IS ORDERED that all pending motions for contempt be set to be heard on _____ day of _____, 2024 at _____:_____ ___.M. with notice to be sent to all parties.

IT was previously stipulate to and ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.** was previously order and cast with attorney fees in the amount of **SEVEN HUNDRED FIFTY dollars and 00/100 ($750.00)** which shall be payable to Orelia Lawdins Trent within sixty (60) days from September 27, 2022. Additionally, **IT IS FURTHER ORDERED** that, despite the deferment, **JOHN CLIFFORD JOSEPH KING, SR.**, shall make a payment of **TWO THOUSAND FIVE HUNDRED dollars and 00/100 ($2,500.00),** within sixty (60) days from September 27, 2022, in payment of past due child support. This amount shall constitute a purge of any previously pending contempt motion filed prior to May 21, 2022, for failure to pay child support, and shall be credited against any amount found past due. JK did not make the payments within the time agreed upon. Charmaine Colston filed an additional Motion for Contempt and Fees thus, the Court will determine the terms of the prior contempt stipulated to on May 31, 2022 and the subsequent filing for Contempt and Cost to be set on a date and time to be ordered by this Court with notice to be sent to the parties.

REQUIREMENTS OF THE PARTIES:

IT IS FURTHER ORDERED that first and foremost, each parent is encouraged to treat the other parent in the same manner that they themselves would like to be treated, to behave in a cordial and cooperative manner particularly in the presence of the child.

IT IS FURTHER ORDERED that the parties refrain from making derogatory comments about the other.

IT IS FURTHER ORDERED that the parties refrain from making derogatory comments about the other in the presence of the children or within earshot of the children.

IT IS FURTHER ORDERED that the parties refrain from harassing each other through any method.

IT IS FURTHER ORDERED that the parties refrain from posting on social media in a negative light about the parties or the children.

IT IS FURTHER ORDERED that at all times the parents shall encourage and foster in the children sincere respect and affection for both parents, and neither parent shall hamper the natural development of the child's love and respect for the other parent.

THUS, DONE AND SIGNED this _____ day of _____, 2024, in Lake Charles, Calcasieu Parish Louisiana.

_____
Honorable W. Mitchell Redd
Judge, 14th Judicial District Court

APPROVED AS TO FORM AND CONTENT:

_____
ABSHIRE LAW FIRM, LLC
Dustan Abshire LSBA
334 Kirby Street
Lake Charles, Louisiana 70601
337-210-8818 (tel.)
337-210-8819 (fax.)
dustan@abshirelawfirm.com
Attorney for John Clifford Joseph King, Sr.

_____
THE LAW OFFICES OF ORELIA R. LAWDINS, LLC
Orelia R. Lawdins-Trent LSBA 36766
Corrie R. Gallien LSBA
1540 N. Martin Luther King Hwy., Stem A
Post Office Box 16351 (70616)
Lake Charles, LA 70601
337-275-5124 (tel.)
337-275-5125 (fax)
orelial@gallienlawdins.com
corrie@gallienlawdins.com
Attorney for Charmaine Colston

_____
DEPARTMENT OF CHILD & FAMILY SERVICES
CHILD SUPPORT ENFORCEMENT
Randall Serrett LSBA
Staff Attorney
3519 Patrick Street
Lake Charles, Louisiana 70605
337-491-2186 (tel.)
Randall.serrett.dcfs@la.gov

Please send notice of judgment to the above counsel

IN THE FOURTEENTH JUDICIAL DISTRICT COURT

IN AND FOR THE PARISH OF CALCASIEU

STATE OF LOUISIANA

JOHN CLIFFORD J. KING, SR.
STATE OF LA CHILD SUPPORT
V. JOHN KING

VERSUS : NO. 2021-002773

CHARMAINE COLSTON

STIPULATION ONLY

Evidence adduced and proceedings had in the above-numbered and entitled cause at Lake Charles, Louisiana, on the 26th day of March, 2024, at 4:18 p.m., before the HONORABLE W. MITCHELL REDD, Judge of the Fourteenth Judicial District Court in and for the Parish of Calcasieu, State of Louisiana.

APPEARANCES:

Dustan J. Abshire
334 Kirby Street
Lake Charles, Louisiana 70601
Counsel for Plaintiff

Orelia R. Lawdins
Corrie Gallien
1540 Martin Luther King Hwy, Ste A
Lake Charles, Louisiana 70601
Counsel for Defendant

Randall Serrett
3519 Patrick Street
Lake Charles, Louisiana 70605
On Behalf of the State of Louisiana

PROCEEDINGS:

(Whereupon testimony was taken.)

(Whereupon there was a lunch break.)

THE COURT: All right. We're going to go back onto the record, and I understand that after having some meetings with the Court and discussing the matter, there's a stipulation to put on the record.

MS. LAWDINS: That's correct, Your Honor.

THE COURT: All right. Ms. Lawdins, you going to do the honors?

MS. LAWDINS: Yes, Your Honor. I believe the parties have already been sworn in.

THE COURT: They have.

MS. LAWDINS: Your Honor, the parties stipulate to the following: The child support arrears amount is going to be $24,510.61. The child support monthly amount is being assessed at $1,000. The parties have stipulated to this amount, and this is within range of Stogner.

The contempt on the attorneys' fees -- any outstanding issues are going to be set on a date to be determined by this Court. The child support will be maintained through the State of Louisiana through the Department of Child and Family Services.

Regarding the custody, Mom will be named the sole custodian, and Dad is to undergo reunification counseling prior to any

visitations occurring with the minors at his costs. The reunification counselor will make any recommendations prior to future visitation. The reunification counselor will also provide this Court with a report and their recommendations of any child visitation moving forward.

The parties agree that the Court will recommend a reunification counselor to be named in the judgment, and any information will be provided to the parties.

The costs in this matter will be determined by the Court. Mr. John King agrees to sign all necessary documents for the children to get their passports, and we do have those documents today, so I think they can sign those today.

The parties agree that any change in the custodial status will require a showing of a heightened burden, or in most instances we refer to it, Your Honor, as the Bergeron standard.

The parties' older, minor children, namely Jayla King and John King, Jr., can communicate with their father of their own volition via whatever method they agreed to within a reasonable time period, as these children are old enough to determine this.

The parties agree to the terms of the Cruella Clause, which I believe the Court will be able to explain to the parties. Ms. Colston agrees to provide the number of Mr.

John King to the minor children via text message within 24 hours of today's date, which is March 26th of 2024. And we would just ask for Mr. John King to provide his number to be provided to the children.

MR. ABSHIRE: Your Honor, I would just ask that that be a reciprocal where they exchange numbers.

THE COURT: Okay.

MS. LAWDINS: You want the children's numbers?

MR. KING: A real number this time.

MS. LAWDINS: The parties agree to maintain the mutual injunction against harassment that has been in place and was initially stipulated to on March 31st of 2022.

Further Mr. John King attests that there are no restraining orders in place preventing any family members or extended family members from contacting or being in contact with any of the minor children or Ms. Colston or prohibiting or restraining them from any visitation in any jurisdictions of the United States and its territories.

MR. KING: Repeat that.

MR. ABSHIRE: That there's no protective orders against --

MS. LAWDINS: That's preventing the kids or your family from contacting them.

Your Honor, these are all the terms of

the stipulated judgment that we have at this time.

THE COURT: Mr. Abshire.

MR. ABSHIRE: One second. Mr. King, would you state your name for the record, please?

MR. KING: John Clifford Joseph King, Sr.

MR. ABSHIRE: All right. Mr. King, you heard the stipulation that was just read into the record?

MR. KING: Yeah.

MR. ABSHIRE: So there was, I believe, the last clause me and you hadn't discussed, but as far as for the -- I don't think we discussed the 24,510.61 specifically, but it was about 23, 24,000 is what we discussed at what the arrearage would be?

MR. KING: Uh-huh (yes).

MR. ABSHIRE: We talked about $1,000 per month?

MR. KING: I mean, I guess.

MR. ABSHIRE: So you heard the stipulation that she read as far as for sole custody and a reunification plan and that the reunification counselor would make a report to the Court for the access between you and the children?

MR. KING: Say it again.

MR. ABSHIRE: You heard the stipulation that she read into the record about Ms. Colston having sole custody and what the

access and the reunification plan and that there will be a report that will be provided?

MR. KING: Yeah.

MR. ABSHIRE: You also heard that she put in that that was discussed about the Court making a determination of costs between the parties, that we call it the Cruella statute. That's just basically you and her will be nice and don't talk bad about each other. It's a longer list of play nice together, the standard language. You also heard her talk about that the kids will be able to contact you via their phones and that we're going to exchange phone numbers?

MR. KING: Can we call before we leave here? Because last time, we left here, and she said they had something to do, and they didn't. And she called ten minutes after I left and said that they wanted to see me, and I don't really want to be playing those games. I really want to get on the phone with them, tell them I love them, and go about my business.

MR. ABSHIRE: Okay. I've got your number here, so we can exchange the numbers.

MR. KING: Okay. If we're counting on Morillie (ph) to do it, she still hasn't given them letters that I wrote.

MR. ABSHIRE: So additionally that there is no protective orders against the children

contacting any members of your family --

MR. KING: Just her.

MR. ABSHIRE: Do you understand the agreement and the stipulation that was read into the record?

MR. KING: Yeah.

MR. ABSHIRE: Okay. Is that your agreement today?

MR. KING: I guess. It's my agreement.

MR. ABSHIRE: Okay. So we've been here off and on --

MR. KING: A very long time.

MR. ABSHIRE: -- for all day, had numerous conversations about all kind of things, and you're ready today to make this agreement and to move forward?

MR. KING: Yeah. Watch how she words it.

MR. ABSHIRE: We'll have a chance to review it. No further questions.

THE COURT: Ms. Lawdins.

MS. LAWDINS: Your Honor, one thing I'd like Mr. Abshire to clarify is did Mr. King just state that there is a restraining order in place against Ms. Colston?

MR. KING: You just wait and see if you get served, and that's that.

THE COURT: Is that something that's outside of --

MR. KING: It's outside of --

MS. LAWDINS: Honestly, Your Honor, we have no idea --

MR. KING: Your Honor, it's outside this court --

MS. LAWDINS: If that is the case, then obviously that's something that we would need to know. Because if he is alleging that there is a basis for a restraining order anywhere that we're unaware of, I believe that now obviously makes this a different conversation for us.

THE COURT: So there's not a restraining order that I'm aware of in this case.

MS. LAWDINS: No, not that we're aware of, but Mr. King --

THE COURT: And what happens outside of this case, I don't know. I mean, that would have to be dealt with wherever that is being filed.

MR. ABSHIRE: Your Honor, speaking with my client, there's no new filings. There's nothing that's going to be coming to Ms. Colston. There's no pleadings, other than what's previously been pled or stipulated to or other things.

THE COURT: I mean, like, I know there's other issues in other courts that y'all have dealt with last week, right? And we've gone out of our way, I think, rightly so to not make those an issue here because they're being dealt with otherwise. So that would be the same thing.

All right, Ms. Lawdins. And I think your client had her hand up. She may have a

question.

MS. LAWDINS: I think she was wondering the same thing, Your Honor. When he had mentioned that there's a restraining order, obviously, that is of a surprise to us.

MS. COLSTON: Because I don't want to --

THE COURT: Hold on. Hold on. Hold on. Ask Ms. Lawdins. Okay.

MS. LAWDINS: Mr. Abshire --

MR. ABSHIRE: There is none -- other than what's previously been filed and dealt with between the different jurisdictions, there's nothing new and nothing upcoming.

MS. GALLIEN: So he does agree with the provisions that was read?

MR. ABSHIRE: Correct.

MS. LAWDINS: Ms. Colston, you've read -- I mean, you've sat in here and you --

THE COURT: Ms. Lawdins, let's have Ms. Colston maybe switch seats so she can be up close to the microphone so we can get it on the record. Thank you.

MS. LAWDINS: Ms. Colston, you heard the provisions of the stipulated judgment?

MS. COLSTON: Yes.

MS. LAWDINS: Are these the provisions that you have agree to?

MS. COLSTON: Yes.

MS. LAWDINS: And you are aware of what has occurred. We have discussed the matter, and you understand each provision that you are to adhere to?

MS. COLSTON: Yes.

MS. LAWDINS: Were all of your questions answered regarding anything discussed today?

MS. COLSTON: Yes. I just want it put on record that there is not a restraining order in Louisiana prohibiting communication or contact.

THE COURT: I think that's part of what was put on the record as part of the stipulation.

MS. LAWDINS: At this time, can you please provide the number for Ms. Jayla King.

MS. COLSTON: I will do that, but can you ask that John King does the same because he's wanting to write it down --

MS. LAWDINS: Ms. Colston, we got it.

MS. COLSTON: Okay. 337-485-7424.

MS. LAWDINS: Wait. Say that one more time. 337 --

MS. COLSTON: 485-7424.

MR. ABSHIRE: 74 --

MS. LAWDINS: 7424.

MS. COLSTON: Uh-hun (yes).

MS. LAWDINS: And the number for Mr. John King, Jr.?

MS. COLSTON: They share phones.

MS. LAWDINS: So to clarify, Your Honor, the number for both of the children is 337-485-7424.

MR. KING: Your Honor, I'm well aware they do not share phones.

THE COURT: Hold on. Look, if y'all have questions, ask your lawyers. I don't know --

MR. ABSHIRE: I would ask that -- my understanding is that John Jr. is punished and that he has a phone; he just doesn't have it right now.

THE COURT: Does he have a phone number?

MS. COLSTON: That's the only number.

THE COURT: They share a number all the time?

MS. COLSTON: Yes, sir.

MS. LAWDINS: Is this what you agree to, the judgment that has been read into the record?

MS. COLSTON: Yes, ma'am.

MS. LAWDINS: Your Honor, I tender Ms. Colston for any question.

THE COURT: All right. I don't have any questions. Anything further, Mr. Abshire?

MR. ABSHIRE: Nothing, Your Honor.

THE COURT: All right. At this time, the Court is going to accept the terms of the stipulation that has been made in open court through counsel, has been confirmed by the parties. I'm going to accept it and make it an order of the Court. And I believe, counsel, you guys told me Ms. Lawdins, you're preparing that?

MS. LAWDINS: That is correct, Your Honor. We will prepare the judgment. We will circulate the judgment to Mr. Abshire.

And although we usually will circulate this in accordance with Rule 9.5, in this instance, we will circulate the judgment and request a return or his comments before the judgment is filed, and it will be signed with both parties' attorneys' signatures.

THE COURT: And, Mr. Serrett, my apologies.

MR. SERRETT: That's all right.

MR. ABSHIRE: All three attorneys.

MS. LAWDINS: Yes, all three attorneys. I apologize, Mr. Serrett.

MR. SERRETT: That's all right. I just want to, for the record, the State has been privy to the negotiations as far as the child support is concerned and the amount of arrears, and we have no opposition to the stipulation.

THE COURT: Thank you, Mr. Serrett. That's an important piece of this. All right. So the future court date will be provided in the judgment when it's presented.

I want -- I don't know if this will make a difference to anybody or not, but I want to address why the Court pushed so hard to have the lawyers and their clients figure out a stipulation in this case. And again, this may not mean anything to you, but I'm going to say it anyway. Having a custody trial does not help the relationship between any parties in any case, ever. Because, Mr.

King, Ms. Colston, you guys were in here just when we were dealing with child support payments, and we saw how contentious it got at times. And I know from experience that having a trial makes things worse, not just for the two of you, but your families, witnesses, everybody that's involved with that.

And the context of what I'm saying is that when we make decisions about custody and visitation, the law is clear that we award that in accordance with the best interest of the children. We don't do what's best for Mom or most convenient for Dad or whatever. That's the law.

Now, there's factors that go into that, but in the end, it's not about Mom, and it's not about Dad; it's about the children. So to me, the result or the next step has been pretty clear where we need to get regardless of why we are where we are. And really what we want is for your children to see a healthy relationship between the two of you. I don't know if that's even possible or not.

I'll tell you this is the top ten, maybe top five of the most contentious cases that I've had to deal with -- people just not being able to get along. And I don't have any advice, words of encouragement, nothing, other than to say that there's some hope that y'all were able to get this far is very encouraging -- it is very encouraging to me.

Something is going to come up in the future. It might be today or next week or next month or two years from now. Something is going to come up that's going to make one of you really frustrated and angry and mad at the other one. If you make a decision now that when that happens -- and it will, because it's impossible to predict everything -- that you'll try to work through it. That helps your kids out because they know.

I'm not asking. I don't want anybody to answer this. But your kids know that Mom and Dad aren't getting along. And I don't want them to know that because they hear Dad talk about Mom or Mom talk about Dad or say ugly things about -- that's the Cruella clause. That's the part about don't talk about the case. Don't talk about the other parent, whatever.

But even if there's not that, I mean, the children know that there's issues between Mom and Dad, and that doesn't help them. It stresses them out. And their lives will be better if they hopefully see a little bit better communication and cooperation between the parents.

So I hope this works. Like I say, I'm encouraged that we had some level of progress today, so good job with that, and that will conclude this matter for now. I'll be looking for the judgment as quickly

as possible.

MS. LAWDINS: Your Honor, I would just ask for Mr. Abshire to recite Mr. King's number onto the record so we can include it in the judgment. I know he did provide me with a copy of it.

MR. ABSHIRE: 318-995-1705.

THE COURT: All right. Thank you all. That will conclude this matter for today.

Proceedings concluded.

REPORTER'S CERTIFICATE

I DO HEREBY CERTIFY that the foregoing 15 pages of typewritten matter constitutes a true and correct translation of my stenomask notes and recording of the proceedings taken in the above-numbered and entitled cause at the time and place set forth on page one hereof.

May 17, 2024

GINA GUINN, CCR

Official Court Reporter

Certificate Number 23010

(Stenomask Method)

Abshire Law Firm, L.L.C.

Dustan J. Abshire
Attorney at Law

June 13, 2024

Orelia R. Lawdins-Trent
1540 Martin Luther King Hwy., Ste. A
Lake Charles, LA 70601
{P.O. Box 16351 (70616)}
orelial@gallienlawdins.com

RE : John King, Sr.
Vs. No. 2021-2773 A
Charmaine Colston

Orelia,

Pursuant to the Stipulated Judgment drafted by your office, please see the below revisions:

- Reunification Counseling – remove "at his own cost". This was not stated on the record and is not in the transcript.
- Arrears – remove "as of March 29, 2023. This was not stated on the record and is not in the transcript.
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Please review the above and address the revisions.

Sincerely,

Dustan J. Abshire
DJA/bnc
Enclosures

dustan@abshirelawfirm.com
www.abshirelawfirm.com

Dustan J Abshire
Attorney at Law

334 Kirby St
Lake Charles, LA 70601
337.419.2024

JOHN CLIFFORD JOSEPH KING, SR.	**DOCKET NO.: 2021002773, DIV.: A**
	14TH JUDICIAL DISTRICT COURT
VERSUS	
	PARISH OF CALCASIEU
CHARMAINE COLSTON	**STATE OF LOUISIANA**

STIPULATED JUDGMENT

The instant matter came before the court on March 26, 2024 pursuant to a trial setting pursuant to on an *Objection to a Hearing Officer Recommendation for Child Support and Child Custody,* filed on behalf of John Clifford Joseph King, Sr. and *Motion for Contempt and Fees,* filed on behalf of Charmaine Colston. Present before the court were John Clifford Joseph King, Sr., and his counsel of record, Dustan Abshire, and Charmaine Colston, and her counsels of record Orelia Lawdins-Trent and Corrie Gallien, also present was RANDALL P. SERRETT, Attorney for the State of Louisiana Department of Children and Family Services, Child Support Enforcement. After reviewing the pleadings of record, as well as hearing the stipulations of the parties hereto, which were recited in open court and assented to under oath, and finding the law in favor hereof; accordingly,

CUSTODY:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that **CHARMAINE COLSTON** is hereby awarded sole legal custody of the minor children Jayla Elizabeth King (D.O.B. 9/02/2009; John Clifford King, Jr. (D.O.B. 9/11/2009) and Jakai Bernard King (D.O.B. 11/29/2018).

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.,** shall undergo Reunification Counseling, at his cost, prior to any visitation occurring with the minor children.

IT IS FURTHER ORDERED that the Court shall order and/or appoint _____, as the Counselor responsible for Reunification Counseling. The Counselor's information is as follows:

ADDRESS: _____

_____

PHONE NUMBER: _____

ELECTRONIC MAIL: _____

IT IS FURTHER ORDERED that the Reunification Counselor shall make a recommendation about any visitation and/or future visitation **JOHN CLIFFORD JOSEPH KING, SR.,** may have with the minor children and provide a written report and recommendation to this Court prior to visitation occurring.

IT IS FURTHER ORDERED that any motion for a change in the custodial status shall require the application of the Bergeron Standard and that it is met before any change in the custodial status is granted.

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.,** shall sign any documents necessary for the minor children to obtain their passports.

COMMUNICATIONS:

IT IS FURTHER ORDERED that the minor children, namely, Jayla Elizabeth King (D.O.B. 9/02/2009; John Clifford King, Jr. (D.O.B. 9/11/2009), can communicate with **JOHN CLIFFORD JOSEPH KING, SR.,** through their own volition in whatever methods they agree to communicate within a reasonable time period. The children are old enough to determine the amount of communication they wish to engage.

IT IS FURTHER ORDERED that the minor children can be contacted via telephone at 337-485-7424. The communication shall not be harassing or excessive and shall be relative only to the children.

IT IS FURTHER ORDERED that the minor children can reach **JOHN CLIFFORD JOSEPH KING, SR.,** at 318-995-1705.

IT IS FURTHER ORDERED that **CHARMAINE COLSTON** shall provide the phone number of **JOHN CLIFFORD JOSEPH KING, SR.,** at 318-995-1705, to the minor children via text message within twenty-four (24) hours of March 26, 2024.

CHILD SUPPORT:

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.**, owes child support arears in the amount of $24,510.61 as of March 29, 2023. Payment of arears shall be paid in the manor prescribed by law, or any court of competent jurisdiction.

IT IS FURTHER ORDERED that Child Support will be maintained by the Department of Child and Family Services (DCFS), Support Enforcement, State of Louisiana, and/or any of its subsidiaries.

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.,** shall pay child support in the amount of $1,000.00 per month plus the 5% statutorily imposed administrative fee per month for a total of $1,050.00 payable to the State of Louisiana Department of Child and Family Services, Child Support Enforcement, effective March 29, 2023. Child Support payments will be made through the Department of Child and Family Services (DCFS), State of Louisiana in the prescribed method of payment as dictated and offered by the State. **JOHN CLIFFORD JOSEPH KING, SR.,** shall be responsible for any fees associated with payment through DCFS's payment system. The child support has been set in accordance with guidelines, the reason for the deviation is that **JOHN CLIFFORD JOSEPH KING, SR.,** purports that he is currently not working and/or unemployed.

COST:

IT IS FURTHER ORDERED that all cost will be assessed to _____, in this matter.

INJUNCTION/ RESTRAINING ORDER:

IT IS FURTHER ORDERED that a mutual restraining order against harassment remains in place and is hereby issued against both parties preventing them harassing the other in person, social media posting(s) or via electronic means.

IT IS FURTHER ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.,** attest that there is no Restraining Order (Temporary, Interim, Final or Permanent) against Charmaine Colston in any jurisdictions of these United States and/or its territories in place prohibiting, restraining or preventing any family member(s) or extended family member(s) from having contact with or contacting the minor children and/or Charmaine Colston and does not prohibit, restrain or prevent any visitation therefrom.

CONTEMPT:

IT IS ORDERED that all pending motions for contempt be set to be heard on _____ day of _____, 2024 at _____:_____ ____.M. with notice to be sent to all parties.

IT was previously stipulate to and ORDERED that **JOHN CLIFFORD JOSEPH KING, SR.** was previously order and cast with attorney fees in the amount of **SEVEN HUNDRED FIFTY dollars and 00/100 ($750.00)** which shall be payable to Orelia Lawdins Trent within sixty (60) days from September 27, 2022. Additionally, **IT IS FURTHER ORDERED** that, despite the deferment, **JOHN CLIFFORD JOSEPH KING, SR.**, shall make a payment of **TWO THOUSAND FIVE HUNDRED dollars and 00/100 ($2,500.00)**, within sixty (60) days from September 27, 2022, in payment of past due child support. This amount shall constitute a purge of any previously pending contempt motion filed prior to May 21, 2022, for failure to pay child support, and shall be credited against any amount found past due. JK did not make the payments within the time agreed upon. Charmaine Colston filed an additional Motion for Contempt and Fees thus, the Court will determine the terms of the prior contempt stipulated to on May 31, 2022 and the subsequent filing for Contempt and Cost to be set on a date and time to be ordered by this Court with notice to be sent to the parties.

REQUIREMENTS OF THE PARTIES:

IT IS FURTHER ORDERED that first and foremost, each parent is encouraged to treat the other parent in the same manner that they themselves would like to be treated, to behave in a cordial and cooperative manner particularly in the presence of the child.

IT IS FURTHER ORDERED that the parties refrain from making derogatory comments about the other.

IT IS FURTHER ORDERED that the parties refrain from making derogatory comments about the other in the presence of the children or within earshot of the children.

IT IS FURTHER ORDERED that the parties refrain from harassing each other through any method.

IT IS FURTHER ORDERED that the parties refrain from posting on social media in a negative light about the parties or the children.

IT IS FURTHER ORDERED that at all times the parents shall encourage and foster in the children sincere respect and affection for both parents, and neither parent shall hamper the natural development of the child's love and respect for the other parent.

THUS, DONE AND SIGNED this _____ day of _____, 2024, in Lake Charles, Calcasieu Parish Louisiana.

_____
Honorable W. Mitchell Redd
Judge, 14th Judicial District Court

APPROVED AS TO FORM AND CONTENT:

_____
ABSHIRE LAW FIRM, LLC
Dustan Abshire LSBA
334 Kirby Street
Lake Charles, Louisiana 70601
337-210-8818 (tel.)
337-210-8819 (fax.)
dustan@abshirelawfirm.com
Attorney for John Clifford Joseph King, Sr.

Orelia R. Lawdins-Trent
THE LAW OFFICES OF ORELIA R. LAWDINS, LLC
Orelia R. Lawdins-Trent LSBA 36766
Corrie R. Gallien LSBA
1540 N. Martin Luther King Hwy., Stem A
Post Office Box 16351 (70616)
Lake Charles, LA 70601
337-275-5124 (tel.)
337-275-5125 (fax)
orelial@gallienlawdins.com
corrie@gallienlawdins.com
Attorney for Charmaine Colston

_____
DEPARTMENT OF CHILD & FAMILY SERVICES
CHILD SUPPORT ENFORCEMENT
Randall Serrett LSBA
Staff Attorney
3519 Patrick Street
Lake Charles, Louisiana 70605
337-491-2186 (tel.)
Randall.serrett.dcfs@la.gov

Please send notice of judgment to the above counsel

IN THE FOURTEENTH JUDICIAL DISTRICT COURT

IN AND FOR THE PARISH OF CALCASIEU

STATE OF LOUISIANA

JOHN CLIFFORD J. KING, SR.
STATE OF LA CHILD SUPPORT
V. JOHN KING

VERSUS : NO. 2021-002773

CHARMAINE COLSTON

STIPULATION ONLY

Evidence adduced and proceedings had in the above-numbered and entitled cause at Lake Charles, Louisiana, on the 26th day of March, 2024, at 4:18 p.m., before the HONORABLE W. MITCHELL REDD, Judge of the Fourteenth Judicial District Court in and for the Parish of Calcasieu, State of Louisiana.

APPEARANCES:

Dustan J. Abshire
334 Kirby Street
Lake Charles, Louisiana 70601
Counsel for Plaintiff

Orelia R. Lawdins
Corrie Gallien
1540 Martin Luther King Hwy, Ste A
Lake Charles, Louisiana 70601
Counsel for Defendant

Randall Serrett
3519 Patrick Street
Lake Charles, Louisiana 70605
On Behalf of the State of Louisiana

PROCEEDINGS:

(Whereupon testimony was taken.)

(Whereupon there was a lunch break.)

THE COURT: All right. We're going to go back onto the record, and I understand that after having some meetings with the Court and discussing the matter, there's a stipulation to put on the record.

MS. LAWDINS: That's correct, Your Honor.

THE COURT: All right. Ms. Lawdins, you going to do the honors?

MS. LAWDINS: Yes, Your Honor. I believe the parties have already been sworn in.

THE COURT: They have.

MS. LAWDINS: Your Honor, the parties stipulate to the following: The child support arrears amount is going to be $24,510.61. The child support monthly amount is being assessed at $1,000. The parties have stipulated to this amount, and this is within range of Stogner.

The contempt on the attorneys' fees -- any outstanding issues are going to be set on a date to be determined by this Court. The child support will be maintained through the State of Louisiana through the Department of Child and Family Services.

Regarding the custody, Mom will be named the sole custodian, and Dad is to undergo reunification counseling prior to any

visitations occurring with the minors at his costs. The reunification counselor will make any recommendations prior to future visitation. The reunification counselor will also provide this Court with a report and their recommendations of any child visitation moving forward.

The parties agree that the Court will recommend a reunification counselor to be named in the judgment, and any information will be provided to the parties.

The costs in this matter will be determined by the Court. Mr. John King agrees to sign all necessary documents for the children to get their passports, and we do have those documents today, so I think they can sign those today.

The parties agree that any change in the custodial status will require a showing of a heightened burden, or in most instances we refer to it, Your Honor, as the Bergeron standard.

The parties' older, minor children, namely Jayla King and John King, Jr., can communicate with their father of their own volition via whatever method they agreed to within a reasonable time period, as these children are old enough to determine this.

The parties agree to the terms of the Cruella Clause, which I believe the Court will be able to explain to the parties. Ms. Colston agrees to provide the number of Mr.

John King to the minor children via text message within 24 hours of today's date, which is March 26th of 2024. And we would just ask for Mr. John King to provide his number to be provided to the children.

MR. ABSHIRE: Your Honor, I would just ask that that be a reciprocal where they exchange numbers.

THE COURT: Okay.

MS. LAWDINS: You want the children's numbers?

MR. KING: A real number this time.

MS. LAWDINS: The parties agree to maintain the mutual injunction against harassment that has been in place and was initially stipulated to on March 31st of 2022.

Further Mr. John King attests that there are no restraining orders in place preventing any family members or extended family members from contacting or being in contact with any of the minor children or Ms. Colston or prohibiting or restraining them from any visitation in any jurisdictions of the United States and its territories.

MR. KING: Repeat that.

MR. ABSHIRE: That there's no protective orders against --

MS. LAWDINS: That's preventing the kids or your family from contacting them.

Your Honor, these are all the terms of

the stipulated judgment that we have at this time.

THE COURT: Mr. Abshire.

MR. ABSHIRE: One second. Mr. King, would you state your name for the record, please?

MR. KING: John Clifford Joseph King, Sr.

MR. ABSHIRE: All right. Mr. King, you heard the stipulation that was just read into the record?

MR. KING: Yeah.

MR. ABSHIRE: So there was, I believe, the last clause me and you hadn't discussed, but as far as for the -- I don't think we discussed the 24,510.61 specifically, but it was about 23, 24,000 is what we discussed at what the arrearage would be?

MR. KING: Uh-huh (yes).

MR. ABSHIRE: We talked about $1,000 per month?

MR. KING: I mean, I guess.

MR. ABSHIRE: So you heard the stipulation that she read as far as for sole custody and a reunification plan and that the reunification counselor would make a report to the Court for the access between you and the children?

MR. KING: Say it again.

MR. ABSHIRE: You heard the stipulation that she read into the record about Ms. Colston having sole custody and what the

access and the reunification plan and that there will be a report that will be provided?

MR. KING: Yeah.

MR. ABSHIRE: You also heard that she put in that that was discussed about the Court making a determination of costs between the parties, that we call it the Cruella statute. That's just basically you and her will be nice and don't talk bad about each other. It's a longer list of play nice together, the standard language. You also heard her talk about that the kids will be able to contact you via their phones and that we're going to exchange phone numbers?

MR. KING: Can we call before we leave here? Because last time, we left here, and she said they had something to do, and they didn't. And she called ten minutes after I left and said that they wanted to see me, and I don't really want to be playing those games. I really want to get on the phone with them, tell them I love them, and go about my business.

MR. ABSHIRE: Okay. I've got your number here, so we can exchange the numbers.

MR. KING: Okay. If we're counting on Morillie (ph) to do it, she still hasn't given them letters that I wrote.

MR. ABSHIRE: So additionally that there is no protective orders against the children

contacting any members of your family --

MR. KING: Just her.

MR. ABSHIRE: Do you understand the agreement and the stipulation that was read into the record?

MR. KING: Yeah.

MR. ABSHIRE: Okay. Is that your agreement today?

MR. KING: I guess. It's my agreement.

MR. ABSHIRE: Okay. So we've been here off and on --

MR. KING: A very long time.

MR. ABSHIRE: -- for all day, had numerous conversations about all kind of things, and you're ready today to make this agreement and to move forward?

MR. KING: Yeah. Watch how she words it.

MR. ABSHIRE: We'll have a chance to review it. No further questions.

THE COURT: Ms. Lawdins.

MS. LAWDINS: Your Honor, one thing I'd like Mr. Abshire to clarify is did Mr. King just state that there is a restraining order in place against Ms. Colston?

MR. KING: You just wait and see if you get served, and that's that.

THE COURT: Is that something that's outside of --

MR. KING: It's outside of --

MS. LAWDINS: Honestly, Your Honor, we have no idea --

MR. KING: Your Honor, it's outside this court --

MS. LAWDINS: If that is the case, then obviously that's something that we would need to know. Because if he is alleging that there is a basis for a restraining order anywhere that we're unaware of, I believe that now obviously makes this a different conversation for us.

THE COURT: So there's not a restraining order that I'm aware of in this case.

MS. LAWDINS: No, not that we're aware of, but Mr. King --

THE COURT: And what happens outside of this case, I don't know. I mean, that would have to be dealt with wherever that is being filed.

MR. ABSHIRE: Your Honor, speaking with my client, there's no new filings. There's nothing that's going to be coming to Ms. Colston. There's no pleadings, other than what's previously been pled or stipulated to or other things.

THE COURT: I mean, like, I know there's other issues in other courts that y'all have dealt with last week, right? And we've gone out of our way, I think, rightly so to not make those an issue here because they're being dealt with otherwise. So that would be the same thing.

All right, Ms. Lawdins. And I think your client had her hand up. She may have a

question.

MS. LAWDINS: I think she was wondering the same thing, Your Honor. When he had mentioned that there's a restraining order, obviously, that is of a surprise to us.

MS. COLSTON: Because I don't want to --

THE COURT: Hold on. Hold on. Hold on. Ask Ms. Lawdins. Okay.

MS. LAWDINS: Mr. Abshire --

MR. ABSHIRE: There is none -- other than what's previously been filed and dealt with between the different jurisdictions, there's nothing new and nothing upcoming.

MS. GALLIEN: So he does agree with the provisions that was read?

MR. ABSHIRE: Correct.

MS. LAWDINS: Ms. Colston, you've read -- I mean, you've sat in here and you --

THE COURT: Ms. Lawdins, let's have Ms. Colston maybe switch seats so she can be up close to the microphone so we can get it on the record. Thank you.

MS. LAWDINS: Ms. Colston, you heard the provisions of the stipulated judgment?

MS. COLSTON: Yes.

MS. LAWDINS: Are these the provisions that you have agree to?

MS. COLSTON: Yes.

MS. LAWDINS: And you are aware of what has occurred. We have discussed the matter, and you understand each provision that you are to adhere to?

MS. COLSTON: Yes.

MS. LAWDINS: Were all of your questions answered regarding anything discussed today?

MS. COLSTON: Yes. I just want it put on record that there is not a restraining order in Louisiana prohibiting communication or contact.

THE COURT: I think that's part of what was put on the record as part of the stipulation.

MS. LAWDINS: At this time, can you please provide the number for Ms. Jayla King.

MS. COLSTON: I will do that, but can you ask that John King does the same because he's wanting to write it down --

MS. LAWDINS: Ms. Colston, we got it.

MS. COLSTON: Okay. 337-485-7424.

MS. LAWDINS: Wait. Say that one more time. 337 --

MS. COLSTON: 485-7424.

MR. ABSHIRE: 74 --

MS. LAWDINS: 7424.

MS. COLSTON: Uh-hun (yes).

MS. LAWDINS: And the number for Mr. John King, Jr.?

MS. COLSTON: They share phones.

MS. LAWDINS: So to clarify, Your Honor, the number for both of the children is 337-485-7424.

MR. KING: Your Honor, I'm well aware they do not share phones.

THE COURT: Hold on. Look, if y'all have questions, ask your lawyers. I don't know --

MR. ABSHIRE: I would ask that -- my understanding is that John Jr. is punished and that he has a phone; he just doesn't have it right now.

THE COURT: Does he have a phone number?

MS. COLSTON: That's the only number.

THE COURT: They share a number all the time?

MS. COLSTON: Yes, sir.

MS. LAWDINS: Is this what you agree to, the judgment that has been read into the record?

MS. COLSTON: Yes, ma'am.

MS. LAWDINS: Your Honor, I tender Ms. Colston for any question.

THE COURT: All right. I don't have any questions. Anything further, Mr. Abshire?

MR. ABSHIRE: Nothing, Your Honor.

THE COURT: All right. At this time, the Court is going to accept the terms of the stipulation that has been made in open court through counsel, has been confirmed by the parties. I'm going to accept it and make it an order of the Court. And I believe, counsel, you guys told me Ms. Lawdins, you're preparing that?

MS. LAWDINS: That is correct, Your Honor. We will prepare the judgment. We will circulate the judgment to Mr. Abshire.

And although we usually will circulate this in accordance with Rule 9.5, in this instance, we will circulate the judgment and request a return or his comments before the judgment is filed, and it will be signed with both parties' attorneys' signatures.

THE COURT: And, Mr. Serrett, my apologies.

MR. SERRETT: That's all right.

MR. ABSHIRE: All three attorneys.

MS. LAWDINS: Yes, all three attorneys. I apologize, Mr. Serrett.

MR. SERRETT: That's all right. I just want to, for the record, the State has been privy to the negotiations as far as the child support is concerned and the amount of arrears, and we have no opposition to the stipulation.

THE COURT: Thank you, Mr. Serrett. That's an important piece of this. All right. So the future court date will be provided in the judgment when it's presented.

I want -- I don't know if this will make a difference to anybody or not, but I want to address why the Court pushed so hard to have the lawyers and their clients figure out a stipulation in this case. And again, this may not mean anything to you, but I'm going to say it anyway. Having a custody trial does not help the relationship between any parties in any case, ever. Because, Mr.

King, Ms. Colston, you guys were in here just when we were dealing with child support payments, and we saw how contentious it got at times. And I know from experience that having a trial makes things worse, not just for the two of you, but your families, witnesses, everybody that's involved with that.

And the context of what I'm saying is that when we make decisions about custody and visitation, the law is clear that we award that in accordance with the best interest of the children. We don't do what's best for Mom or most convenient for Dad or whatever. That's the law.

Now, there's factors that go into that, but in the end, it's not about Mom, and it's not about Dad; it's about the children. So to me, the result or the next step has been pretty clear where we need to get regardless of why we are where we are. And really what we want is for your children to see a healthy relationship between the two of you. I don't know if that's even possible or not.

I'll tell you this is the top ten, maybe top five of the most contentious cases that I've had to deal with -- people just not being able to get along. And I don't have any advice, words of encouragement, nothing, other than to say that there's some hope that y'all were able to get this far is very encouraging -- it is very encouraging to me.

Something is going to come up in the future. It might be today or next week or next month or two years from now. Something is going to come up that's going to make one of you really frustrated and angry and mad at the other one. If you make a decision now that when that happens -- and it will, because it's impossible to predict everything -- that you'll try to work through it. That helps your kids out because they know.

I'm not asking. I don't want anybody to answer this. But your kids know that Mom and Dad aren't getting along. And I don't want them to know that because they hear Dad talk about Mom or Mom talk about Dad or say ugly things about -- that's the Cruella clause. That's the part about don't talk about the case. Don't talk about the other parent, whatever.

But even if there's not that, I mean, the children know that there's issues between Mom and Dad, and that doesn't help them. It stresses them out. And their lives will be better if they hopefully see a little bit better communication and cooperation between the parents.

So I hope this works. Like I say, I'm encouraged that we had some level of progress today, so good job with that, and that will conclude this matter for now. I'll be looking for the judgment as quickly

as possible.

MS. LAWDINS: Your Honor, I would just ask for Mr. Abshire to recite Mr. King's number onto the record so we can include it in the judgment. I know he did provide me with a copy of it.

MR. ABSHIRE: 318-995-1705.

THE COURT: All right. Thank you all. That will conclude this matter for today.

Proceedings concluded.

REPORTER'S CERTIFICATE

I DO HEREBY CERTIFY that the foregoing 15 pages of typewritten matter constitutes a true and correct translation of my stenomask notes and recording of the proceedings taken in the above-numbered and entitled cause at the time and place set forth on page one hereof.

May 17, 2024



GINA GUINN, CCR

Official Court Reporter

Certificate Number 23010

(Stenomask Method)

***August 22, 2024 Reference**: John King Sr ID # 2172585 **DCFS Case #** 000380702-01*
***Subject:** COMPLAINT ADDRESS CHANGE UNAUTHORIZED*
***Cc:** DCFS*

URGENT REQUEST WEBSITE LA CAFE IS NOT ALLOWING UPDATES TO CONTACT INFORMATION

John King Sr.
Residential Address
123 N. Louisiana Avenue
Lake Charles, Louisiana 70601
johncjking86@gmail.com
pH# 318-995-1705

DCFS Child Support Enforcement
PO Box 94065
Baton, Rouge LA 70821

The contents of this letter are confidential and intended solely for the recipient(s) addressed. This correspondence, including any attachments, may contain privileged or sensitive information that is not to be disclosed, copied, or shared with any person or entity not directly copied on this communication. Unauthorized disclosure or distribution of this letter is strictly prohibited. If you have received this letter in error, please notify the sender immediately and delete the original message and any copies from your records.

Dear DCFS,

Your website LA CAFE is not working and will not allow me to update my residential address to the accurate mailing and residential address. There is a fictitious mailing address listed as residential that I have never heard of before as per my casework and drivers license i am a resident of the state of Louisiana.

I am writing to address unauthorized and repeated changing of my residential and mailing addresses as well as filing a formal complaint to determine who is allowing the wrong imaginary address on my account which is preventing me from receiving timely correspondence.

My physical and residential address must always match and it is documented that I have filed letters multiple times so I will repeat again
My MAILING AND PHYSICAL ADDRESS IS
Mr. John C. King Sr.
123 N. Louisiana Ave
Lake Charles, LA 70601

I HAVE NO ADDRESS IN NEW JERSEY AND THIS IS HARASSMENT.

As well as the repeated technical issues with uploads via the DCFS LA CAfe portal. I ask you questions that are not answered in LA CAFE. I have repeatedly notified in writing that there are issues with the server and the ability to either A) upload documents in real time or B) My case worker continues to send USPS mail to imaginary addresses that do not exist in states that I am not a resident of.

***August 22, 2024 Reference**: John King Sr ID # 2172585 **DCFS Case #** 000380702-01*
***Subject:** COMPLAINT ADDRESS CHANGE UNAUTHRORIZED*

I AM ESCALATING THIS TO DO AN INTERNAL INQUIRY TO DISCOVER WHO IS PUTTING IMAGINARY ADDRESSES ON MY PROFILE. MEMORIALIZE THAT ANY AND ALL ENFORCEMENT ACTION IS TAKING PLACE WITHOUT DUE PROCESS OR PROPER NOTIFICATION AS SOMEONE HAS UNAUTHORIZED ACCESS AND IS ALTERING MY ACCOUNT.

Your Personal Information

Name:	JOHN CLIFFORD JOSEPH KING SR
Member ID:	2172585
Member Status:	Active
Home Phone:	N/A
Cell Phone:	318-995-1705
Work Phone:	N/A
Email:	Johncjking86@gmail.com
Mailing Address:	123 N LOUISIANA AVE LAKE CHARLES LA 70601
Residential Address:	50 COLUMBIA ST APT 7A NEWARK NJ 7102

This residential address appears on no court orders signed by the judge, appears on no form of identification and is IMAGINARY!

I am writing for the last time requesting a formal review as to why my address keeps changing without my permission or a court order?

MEMORIALIZE: as long as this continues I cannot be responsible for any correspondence deadlines and will cite this continued injustice as a violation of due process.

Thank You

John C. King Sr.

***August 22, 2024 Reference**: John King Sr ID # 2172585 **DCFS Case #** 000380702-01 **Subject:** COMPLAINT ADDRESS CHANGE UNAUTHRORIZED*

***Cc:** Ms. Charde Carter **Subject:** Challenging review from letter mailed Aug 14, 2024* 3

Your case may be heard in-person or remotely. To find out how your Final Restraining Order will be held, upon receipt of this order, you must immediately contact the Family court. For your convenience, all county Family Court numbers are listed below. All restraints remain in full force and effect until the final hearing.

Family Court County Phone Numbers

Atlantic	609-402-0100 x47580
Bergen	201-221-0700 x25185
Burlington	609-288-9500 x38834
Cape May	609-402-0100 x47710
Camden	856-650-9100 x43520
Cumberland	856-878-5050 x15640
Essex	973-776-9300 x57210
Gloucester	856-878-5050 x15520
Hudson	201-748-4400 x60830 201-748-4400 x60810
Hunterdon	908-824-9750 x13350
Mercer	609-571-4200 x74402
Middlesex	732-645-4300 x88560
Monmouth	732-358-8700 x87211 732-358-8700 x87160
Morris	862-397-5700 x75250
Ocean	732-504-0700 x64090
Passaic	973-653-2910 x24624
Salem	856-878-5050 x15881
Somerset	908-332-7700 x13007
Sussex	862-397-5700 x75184
Union	English: 908-787-1650 x21710 Spanish: 908-787-1650 x21720
Warren	908-750-8100 x13480

Go to "https://www.njcourts.gov/forms/12751_prepare_dvtro_hearing.pdf?c=0LD" to view "Preparing for a Domestic Violence Final Restraining Order Hearing" instructions.

New Jersey Judiciary
Family Practice Division

Preparing for a Domestic Violence Final Restraining Order Hearing

The information in this document provides basic, consistent information and guidance to both the plaintiff and defendant on what to expect when attending a Final Restraining Order (FRO) hearing. The information was combined under one document because some of the material concerns both parties. In addition, in the interest of transparency, each party will know what information is given to the other.

Once a domestic violence Temporary Restraining Order (TRO) is granted by a Superior Court or Municipal Court judge, a FRO hearing is scheduled before a Family judge in the Superior Court. Both the plaintiff and defendant will need to prepare for FRO hearing. In this court, domestic violence cases are civil cases and not criminal offenses. In these cases, the court will apply the civil standard or burden of proof rather that the criminal standard of proof which is beyond a reasonable doubt. The burden of proof in these cases is by the preponderance of the evidence. This means the person must show evidence to prove their claim and the level of evidence they must show to do so (*the civil standard* requires a 51% or greater probability while *the criminal standard* requires closer to 100%). The plaintiff (the person who filed the TRO application) has the burden of proof at the FRO hearing.

You **must** attend the final hearing. You have the right to bring an attorney; the court cannot provide an attorney for you.

If you are the plaintiff, you must attend the final hearing, even if you decide to dismiss the restraining order. The FRO hearing might take place remotely over a video platform, such as Zoom or Teams (see Domestic Violence Remote Hearing Instruction Sheet for Litigants), or you might be asked to appear in person at the courthouse. If you need to amend only your complaint, prior to the FRO hearing, you may file an Application to Amend Domestic Violence Complaint and submit the amended complaint through the Judiciary Electronic Document System (JEDS). If you need to amend the order prior to the FRO hearing please contact the Family Division where your case is being heard.

You will need to prepare yourself, and any witnesses you might have for the FRO hearing. If you have any evidence you wish to present at the hearing, for example, photos, text messages, video, etc. you must contact the court prior to the hearing for instructions on providing this evidence.

- Children should not be brought to the final hearing unless otherwise instructed by a judge to do so. If you have children and are going to ask the court for child support, please bring or have available your most recent pay stub, childcare costs, and tax return.
- If you are unemployed and receiving benefits from employment or disability, please bring proof.
- Failure to appear at your scheduled time might result in your case being postponed to another day and/or time, or your case might be dismissed.

If you are the defendant, you must attend the hearing even if the plaintiff is going to dismiss the restraining order. This hearing might take place remotely over a video platform, such as Zoom or Teams (see Domestic Violence Remote Hearing Instruction Sheet for Litigants), or you might be asked to appear in person at the courthouse. If you wish to appeal your TRO you may file an Application for Appeal and Order.

You will need to prepare yourself, and any witnesses you might have for the hearing. If you have any evidence you wish to present at the hearing, for example, photos, text messages, video, etc. you must contact the court prior to the hearing for instructions on providing this evidence.

- Children should not be brought to the final hearing unless otherwise instructed by a judge to do so. If you have children, child support might be ordered in the restraining order. Please bring or have available your most recent pay stub and tax return.
- If you are unemployed and receiving benefits from employment or disability, please bring proof.
- **Failure to appear at your scheduled time will likely result in the court proceeding without you and an FRO being entered against you**.

If You Are the Defendant, It Is Important You Read This Section

If an FRO is entered against you, you should be aware that there are **significant penalties** that will be imposed automatically.

- Your name **will** be kept in a domestic violence central registry. This can affect your employment affect your housing, prevent you from being a resource/foster parent, or affect a professional license.
- You **will** be fingerprinted and fined up to $500.
- You **will** be barred from where the plaintiff lives and works and possibly barred from additional locations and/or additional people (for example, plaintiff's relatives).
- Your parenting time with your child(ren) **might** be affected and you **might** be ordered to participate in court ordered services such as attendance at a batterer's intervention program, submitting to a substance abuse evaluation, or submitting to a psychological/psychiatric evaluation.
- You **will not** be permitted to possess any weapon, ID card, or purchase permit while the FRO is in effect, or for two years, whichever is greater.

Whether you are the plaintiff or defendant, you will have the opportunity to present their case to the court. During the FRO hearing, you will give information (called "*evidence*") to a judge who will decide your case. The judge is the finder of fact; there is no jury in these cases. Evidence that you can present includes information you or someone else tells the judge ("*testimony*") as well as items like email and text messages, documents, photos, and objects ("*exhibits*").

If you do not have an attorney, you will need to collect and present your evidence in the proper way. Courts have rules about evidence so that judges will make decisions based on facts, not gossip and guesswork. The court will allow you to present witnesses, as well as ask questions of the other person and their witnesses (called "*cross-examination*"). Although the rules can be confusing, they are designed to protect your rights, and you can use them to help prepare for your court appearance.

The judge's decision on whether to enter an FRO is based on the information that is provided, so you should come prepared with any evidence you have. Examples of evidence that the judge might accept are:

- your testimony, which should include details regarding the date, location, and specific details of the incident,
- photos of visible injuries and/or property damage,
- copies of police, medical and/or dental reports,
- threatening or harassing letters or text messages,

- threatening messages from answering machines or voicemail,
- financial documents, if seeking financial support, and/or
- witnesses.

Once an FRO is granted, it does not expire. The order remains in effect **forever** unless it is dismissed by the court.

- The plaintiff can request a dismissal in person at the courthouse or by calling the court.
- The defendant can also request a dismissal but would need to file a motion using our packet CN 12420 - How to Ask the Court to Dismiss a Final Restraining Order found on njcourts.gov.

The entry of the FRO is independent of any possible criminal charge that might have also been filed, and this court's issuance of an FRO will not affect those proceedings. However, a violation of the contact provisions of an FRO is a crime for which the defendant could be arrested and charged criminally.

Ways to Find Help with Your Case

Work with a Domestic Violence Advocate

If you are the plaintiff, you can reach out to a domestic violence advocate. A domestic violence advocate is a person who works at your local domestic violence program. Advocates are knowledgeable and can offer specialized domestic violence support and information. They can provide information about services near you, like where to find a lawyer or legal assistance, how to find counseling for you or your children, where to find a shelter or help with housing, and recommend a place that can supervise the defendant's parenting time.

A domestic violence advocate cannot be your lawyer; however, they can go with you to court to provide support. They can also help you prepare for your hearing, including helping you connect remotely to the hearing, and might know about lawyers who are willing to take cases at no charge or low cost (legal aid services).

Even if you have a lawyer, working with a domestic violence advocate can still be helpful. They might know more about domestic violence than your lawyer They can help you make a safety plan. You can find an advocate by asking at the local courthouse or contacting the NJ Coalition to End Domestic Violence njcedv.org.

Use Legal Referral Services

If you cannot afford a lawyer, you may contact the legal services program in your county to see if you qualify for free legal services. Their telephone number can be found online under "Legal Aid" or "Legal Services." If you do not qualify for free legal services and need help in locating an attorney, you can contact the bar association in your county. Most county bar associations have a Lawyer Referral Service.

If you can hire a lawyer, take the time to interview several lawyers before hiring one. Make sure to ask the lawyer about the fee for representing you and what you can expect. Ask any lawyer you interview about their other cases with domestic violence as it is in your best interest to find a lawyer with knowledge about domestic violence.

For an explanation of New Jersey law about domestic violence and suggestions of some of the measures you can take to protect yourself from abuse, including using the Prevention of Domestic Violence Act to get a restraining order to keep the abuser away, visit the Legal Services of New Jersey (LSNJ) website (https://www.lsnjlaw.org/Family-Relationships/Pages/default.aspx#). The title of the guide is "*Domestic Violence - A Guide to the Legal Rights of Domestic Violence Victims in New Jersey*".

Ask at Your Local Courthouse

Court staff *cannot* give you legal advice because they must be neutral and impartial; however, they *can* help you find self-help resources and answer questions about filing papers, setting a hearing or general court procedures. You can find a listing of each county's phone number on the Family Division page listed under *Domestic Violence Resources*/County Phone Numbers for Temporary Restraining Orders.

Additional assistance is available at the courthouse from the ombudsman. In the Judiciary, the ombudsman is a neutral staff person who answers questions, addresses concerns from the public and is responsible for enhancing customer service in the courts. The Ombudsman can also offer referral information to other available resources. They may have contact information about pro bono and legal services organizations. A contact list for the Ombudsmen can be found here: Self-Help Center/Find Local Ombudsman…/Local Ombudsman Contact List

For additional information about domestic violence visit the Family Division page on njcourts.gov.

Call Your Local Library

Public libraries do have a tool for online legal research, and can show people how to use it, so we can say that.

Options After the FRO is Entered

How to File an Appeal

An appeal is a written request asking a higher court to look at the decision of the judge and change that judge's decision. You must make a written request for an appeal **within 45 days** after the judge decided the case and signed an order in the Superior Court. If you want to file an appeal of a court order you can use our kit: CN 10837 - How to Appeal a Trial Court, Tax Court or State Agency Decision, found on njcourts.gov.

How to Change, Modify, or Enforce an FRO

Either **the plaintiff or defendant** can file to change How to Enforce or Request a Change of a Domestic Violence Restraining Order or Sexual Assault Survivor Protection Order. You can submit the completed forms through the Judiciary Electronic Document Submission (JEDS) system, or you can mail them to the courthouse. For information on using JEDS, see the JEDS self-help page.

If you are the plaintiff and the defendant has violated the restraining you should call 911.

My Case is Emergent (Emergent Application Order to Show Cause)

An emergent hearing in the family court is meant to protect children from substantial and permanent harm. You can file for an emergent hearing by filling out the Order to Show Cause for FM, FD and FV Dockets.

New Jersey Domestic Violence Civil Complaint and Temporary Restraining Order

☐ TRO ☑ Amended TRO

N.J.S.A. 2C:25-17 et seq.

☑ Superior Court, Chancery Division, Family Part, ESSEX County ☐ Municipal Court of

Docket Number	Police Case Number
FV-07-000817-22	C21039526

In the Matter of Plaintiff (Victim)	Plaintiff's Sex	Plaintiff's Date of Birth
KING JOHN C	☑ Male ☐ Female	04/17/1986

Defendant Information

Last Name	First Name	Initial	Defendant's Sex	Race
COLSTON	CHARMAINE		☐ Male ☑ Female	UNKNOWN

AKA	Defendant's Social Security Number	Date of Birth	Height	Weight
COLSTON CHARMAINE Y		11/30/1989	5 07	165

Home Address	City	State	Zip	Eye Color	Hair Color
4419 LAKE FAIRWAY DR , UNABLE TO FORWARD	LAKE CHARLES	LA	70601	BROWN	BLACK

Home Phone Number	Work Phone Number	Distinguishing Features (Scars, Facial Hair, Etc.)

Employer	Driver's License Number

Work Address	State	Driver's License Expiration Date

The undersigned complains that said defendant did endanger plaintiff's life, health or well being (give specific facts regarding acts or threats of abuse and the date(s) and time(s) they occurred; specify any weapons):

ON (Date)	AT (Time)	BY (Details; specify any weapons)
09/08/2021	09:20 PM	ON SEPTEMBER 8, 2021, JOHN CLIFFORD JOSEPH KING SR ENTERED THE THIRD POLICE PRECINCT TO FILE A DOMESTIC REPORT. MR. KING SR STATED HE HAS BEEN RECEIVING NUMEROUS HARASSING PHONE CALLS. EMAILS AND TEXT MESSAGES FROM HIS CHILDREN MOTHER, CHARMINE COLSTON IN VIOLATING OF A TEMPORARY RESTRAINING ORDER GRANTED TO MR.KING SR FROM THE PARISH OF CALSASIEU IN THE STATE OF LOUISIANA ON AUGUST 19, 2021 FROM JUDGE W. MITCHELL REDD. MR. KING SR STATED SINCE AUGUST 24, 2021 TO THE PRESENT, HE WAS RECEIVED NUMEROUS PHONE CALLS, TEXT AND EMAILS FROM MISS. COLSTON WHICH THREATENS MR. KING SR GIRLFRIEND'S SAFELY, THREATENING MR. KING SR. LIFE AND HIS RELATIONSHIP WITH THE CHILDREN SHARED BETWEEN THEM, AND AS WELL AS PRETENDING TO BE THE CHILDREN THAT ARE SHARED BY MR. KING SR AND MISS. COLSTON IN AN ATTEMPT BY MISS.COLSTON TO GET MR. KING SR TO CONTACT HER. MR.KING SR WAS ADVISED OF HIS DOMESTIC VIOLENCE VICTIMS RIGHTS WHICH INCLUDED THE AVAILABILITY OF OBTAINING A TEMPORARY RESTRAINING ORDER AND THE SERVICES OF A D.V.R.T. MEMBER. MR. KING SR ACCEPTED POLICE ASSISTANCE ON OBTAINING A TEMPORARY RESTRAINING ORDER. THE THIRD PRECINCT RECEIVED FROM MR. KING SR COPIES OF THE TRO FROM THE PARISH OF CALCASIEU TRO UNDER CASE NUMBER : 2021-002773, TEST MESSAGES, EMAILS AND CALL LOGS OF MISS. COLSTON NUMEROUS ATTEMPTS IN CONTACTING HIM. ALL WERE SUBMITTED. BWC RECORDED.

which constitute(s) the following criminal offenses(s): (Check all applicable boxes. Law Enforcement Officer: Attach *N.J.S.P.* UCR DV1 offense report(s)):

☐ Homicide	☐ Terroristic Threats	☐ Criminal Restraint	☐ Sexual Assault	☐ Lewdness	☐ Burglary	☑ Harassment
☐ Assault	☐ Kidnapping	☐ False Imprisonment	☐ Criminal Sexual Contact	☐ Criminal Mischief	☐ Criminal Trespass	☐ Stalking
☐ Criminal Coercion	☐ Robbery	☑ Contempt of a DV Order	☐ Any Other Crime Involving Risk of Death or Serious Bodily Injury			☐ Cyber Harassment

1. Any prior history of domestic violence reported or unreported? If Yes, explain: ☐ Yes ☑ No

2. Does Defendant have a criminal history? (If Yes, submit any available criminal history report) ☐ Yes ☑ No

3. Any prior or pending court proceedings involving parties? (If Yes, enter docket number, court, county, state) ☑ Yes ☐ No
   CASE NUMBER 2021-002773, 14TH JUDICIAL COURT, LA

4. Has a criminal complaint been filed in this matter? (If Yes, enter date, docket number, court, county, state) ☑ Yes ☐ No
   CASE NUMBER 2021-002773, 14TH JUDICIAL COURT, LA

5. If Law Enforcement Officers responded to a domestic violence call:
   Were weapons seized? If Yes, describe: ☐ Yes ☑ No Was Defendant arrested? If Yes, describe: ☐ Yes ☑ No

6. (A) The Plaintiff and Defendant are 18 years old or older or emancipated and are: (select one)
   ☐ Married / Civil Union ☐ Divorced ☐ Present Household Member ☐ Was at Any Time a Household Member **OR**
   (B) The Defendant is 18 years old or older or emancipated and Plaintiff and Defendant are: (select one)
   ☐ Unmarried ☑ Co-Parents ☐ Expectant Parents ☐ Plaintiff and Defendant have had a dating relationship

7. Where appropriate list children you have with the Defendant, if any (include name, sex, date of birth, person with whom child resides)

Child's Name: Last	First	M.I.	Sex	Birth Date	Resides

Docket Number	Defendant's Name
FV-07-000817-22	**CHARMAINE COLSTON**

8. The Plaintiff and Defendant: ☐ Presently; ☑ Previously; ☐ Never: Resided Together
☐ Family Relationship: What is your relationship to the defendant? _____ (Specify)

Certification

I certify that the foregoing responses made by me are true. I am aware that if any of the foregoing responses made by me are willfully false, I am subject to punishment.

06/08/2022
Date

JOHN C KING
Signature of Plaintiff

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	CHARMAINE COLSTON

Part 1 - RELIEF - Instructions: Relief sought by Plaintiff

DEFENDANT:

	TRO	FRO	TRO Granted	
1.	☑	N/A	☑	You are prohibited from returning to the scene of violence.
2.	☑	☑	☑	You are prohibited from future acts of domestic violence.
3.	☑	☑	☑	You are barred from the following locations: ☑ Residence(s) of Plaintiff ☑ Place(s) of employment of Plaintiff
				☑ Other (Only list addresses known to Defendant): 123 NORTH LOUISIANA AVE, LAKE CHARLES, LA
4.	☑	☑	☑	You are prohibited from having **any** oral, written, personal, electronic, or other form of contact or communication with Plaintiff.
	☐	☐	☐	Other(s):
5.	☑	☑	☑	You are prohibited from making or causing anyone else to make harassing communications to: Plaintiff
	☐	☐	☐	Other(s) - Same as item 4 above or list names:
6.	☑	☑	☑	You are prohibited from stalking, following or threatening to harm, stalk or follow: Plaintiff
	☐	☐	☐	Other(s) - Same as item 4 above or list names:
7.	☐	☐		You must pay emergent monetary relief to (describe amount and method):
	☐	☐	☐	Plaintiff:
	☐	☐	☐	Dependent(s):
8.	☐	☐	☐	You must be subject to intake monitoring of conditions and restraints:
	☐	☐	☐	Other (evaluations or treatment - describe):
9.	☐	☐	☐	Psychiatric evaluation:
10.	☑	☑	☑	**Prohibition Against Possession of Weapons:** You are prohibited from possessing **any and all firearms or other weapons** and must immediately surrender these firearms, weapons, permit(s) to carry, application(s) to purchase firearms and firearms purchaser ID card to the officer serving this Court Order. Failure to do so may result in your arrest and incarceration.

PLAINTIFF:

11.	☐	☐	☐	You are granted exclusive possession of (list residence or alternate housing only if specifically known to defendant):
12.	☐	☐	☐	You are granted temporary custody of:
13.	☐	☐	☐	Other relief for - Plaintiff:
	☐	☐	☐	Other relief for - Children:

LAW ENFORCEMENT OFFICER:

You are to accompany to scene, residence, shared place of business, other (indicate address, time, duration and purpose):

☑	☑	☑	Plaintiff: ACCOMPANY PLAINTIFF TO HIS RESIDENCE
☐	☐	☐	Defendant:

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	CHARMAINE COLSTON

Warrant to Search for and to Seize Weapons for Safekeeping

☑ **To any law enforcement officer having jurisdiction -** this Order shall serve as a warrant to search for and to seize any issued permit to carry a firearm, application to purchase a firearm and firearms purchaser identification card issued to the defendant and the following firearm(s) or other weapon(s).Describe the weapons to be seized:
38 PISTOL

1. **You are hereby commanded** to search for the above described weapons and/or permits to carry a firearm, application to purchase a firearm and firearms purchaser identification card and to serve a copy of this Order upon the person at the premises or location described as:
1225 COUNTRY CLUD RD UNIT 5107, LAKE CHARLES, LA

2. **You are hereby ordered** in the event you seize any of the above described weapons, to give a receipt for the property so seized to the person from whom they were taken or in whose possession they were found, or in the absence of such person to have a copy of this Order together with such receipt in or upon the said structure from which the property was taken.

3. **You are authorized** to execute this Order immediately or as soon thereafter as is practicable:

☐ Anytime ☑ Other: IMMEDIATELY

4. **You are further ordered,** after the execution of this Order, to promptly provide the Court with a written inventory of the property seized per this Order.

Part 2 - RELIEF - DEFENDANT:

	TRO	FRO	TRO Granted	
1.	☐	☐	☐	No parenting time / visitation until further ordered;
	☐	☐	☐	Parenting time / visitation pursuant to _____ suspended until further order: _____
	☐	☐	☐	Parenting time / visitation permitted as follows:
2.	☐	☐	☐	Risk assessment ordered (specify by whom, any requirements, dates):
3.	☐	☐		You must provide compensation as follows:
	☐	☐	☐	Emergent support for Plaintiff: _____
	☐	☐	☐	for Dependent(s): _____
	N/A	☐	☐	Ongoing support for Plaintiff: _____
	N/A	☐	☐	for Dependent(s): _____
	☐	☐	☐	Compensatory damages to Plaintiff: _____
	N/A	☐	☐	Punitive damages to Plaintiff: _____
	N/A	☐	☐	to Third Party(ies) (describe): _____
	☐	☐	☐	Medical coverage for Plaintiff: _____
	☐	☐	☐	for Dependent(s): _____
	☐	☐	☐	☐ Rent ☐ Mortgage payments (specify amount(s) and recipient(s)):
	☐	☐	☐	You must participate in a batterers intervention program:
	☐	☐	☐	You are granted temporary possession of the following personal property (describe):

Part 2 - RELIEF - PLAINTIFF:

☐ ☐ ☐ You are granted temporary possession of the following personal property (describe):

Comments:

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	**CHARMAINE COLSTON**

Addendum:

☐ **TRO denied.** Complaint dismissed by Family Part.

☐ **TRO denied by Municipal Court.**

☐ **TRO denied** by Superior Court Judge at De Novo Hearing.

☐ **TRO granted** by Superior Court Judge at De Novo Hearing. The Court has established jurisdiction over the subject matter and the parties pursuant to *N.J.S.A.* 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to *R.* 5:7A(b) and *N.J.S.A.* 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.

☑ **TRO granted.** The Court has established jurisdiction over the subject matter and the parties pursuant to *N.J.S.A.* 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to *R.* 5:7A(b) and *N.J.S.A.* 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.

Date/Time ☐ Via Telecommunications	s/ Hearing Officer	
Date/Time ☐ Via Telecommunications	s/ Honorable Municipal Court Judge	Court / County
06/08/2022 09:58 AM Date/Time ☐ Via Telecommunications	s/ JOANNE COCCHIOLA Honorable Superior Court Judge	ESSEX Court / County

All Law Enforcement Officers Will Serve and Fully Enforce This Order

This *ex parte* Domestic Violence Complaint and Temporary Restraining Order meets the criteria of the federal Violence Against Women Act for enforcement outside of the State of New Jersey upon verification of service of defendant. 18 *U.S.C.A.* 2265 & 2266

This Order Shall Remain in Effect Until Further Order of the Court and Service of Said Order on the Defendant.

Notice to Appear to Plaintiff and Defendant

1. ☐ Both the plaintiff and defendant are ordered to appear for a final hearing on (date) _____ at (time) _____ at the Superior Court, Chancery Division, Family Part, _____ County, located at (address)

Note: You must bring financial information including pay stubs, insurance information, bills and mortgage receipts with you to Court.

2. ☑ Remote: All parties shall appear for a hearing on 08/01/2022 at 08:30 AM
   - I. ☐ Video Remote Hearing is scheduled at the above date and time. You must attend via video as scheduled. Please contact the court for further details at _____
   - II. ☐ Phone Remote Hearing is scheduled at the above date and time. You must attend via Phone as scheduled. Please contact the court for further details at _____
   - III. ☑ Remote Hearing is scheduled at the above date and time. You must attend as scheduled. Please contact the court for further details at 973-776-9300 X57210
   - IV. ☐ The proceeding will be conducted on the papers. Please contact the court for details _____
3. ☐ The final hearing in this matter shall not be scheduled until: _____
4. ☐ Interpreter needed. Language: _____

Upon satisfaction of the above-noted conditions notify the Court immediately so that a final hearing date may be set.

IMPORTANT: The parties cannot themselves change the terms of this Order on their own. This Order may only be changed or dismissed by the Superior Court. The named defendant cannot have any contact with the plaintiff without permission of the Court.

Notice to Defendant

A violation of any of the provisions listed in this Order or a failure to comply with the directive to surrender all weapons, firearm permits, applications or identification cards may constitute criminal contempt pursuant to *N.J.S.A.* 2C:29-9(b), and may also constitute violations of other state and federal laws which may result in your arrest and/or criminal prosecution. This may result in a jail sentence.

You have the right to immediately file an appeal of this temporary Order before the Superior Court, Chancery Division, Family Part, as indicated above and a hearing may be scheduled.

Docket Number	**Defendant's Name**
FV-07-000817-22	**CHARMAINE COLSTON**

Return of Service

☑ Plaintiff was given a copy of the Complaint / TRO by:

SERVED IN COURT JENKINS T	09:58 AM 06/08/2022	ESSEX COUNTY SUPERIOR COURT
Print Name	Time and Date	Signature / Badge Number / Department

☑ I hereby certify that I served the within Complaint / TRO by delivering a copy to the Defendant personally:

SERVED IN COURT JENKINS T	09:59 AM 06/08/2022	ESSEX COUNTY SUPERIOR COURT
Print Name	Time and Date	Signature / Badge Number / Department

☐ I hereby certify that I served the within Complaint / TRO by use of substituted service as follows:

Print Name	Time and Date	Signature / Badge Number / Department

☐ Defendant could not be served (explain): _____

Print Name	Time and Date	Signature / Badge Number / Department

The Courthouse is accessible to those with disabilities. Please notify the Court if you require assistance.

Distribution: Family Part, Plaintiff, Defendant, Sheriff, Other _____

Gmail True King <truekingfile@gmail.com>

Fwd: Circulated judgment

John King <johncjking86@gmail.com> Tue, Mar 11, 2025 at 3:12 PM
To: True King <truekingfile@gmail.com>

---------- Forwarded message ---------
From: <baleigh@abshirelawfirm.com>
Date: Thu, Jul 11, 2024 at 11:52 AM
Subject: RE: Circulated judgment
To: John King <johncjking86@gmail.com>
Cc: Dustan Abshire <dustan@abshirelawfirm.com>, Krissy Dupre <krissy@abshirelawfirm.com>

As I told you over the phone yesterday, I have not received the signed Judgment from the 14th Judicial District Court back yet. To our knowledge, the Judgment HAS NOT BEEN SIGNED yet, because we have not received it back from the Court yet. Attached is the final draft copy (without Judge's signature), which we are unaware at this time if the Judge has signed this attached copy.

Also, attached is the transcript (which has already been provided to you) of the hearing pursuant to the attached draft of the Judgment.

Also, attached is a letter that our office sent to Lawdins regarding the changes needed in the FIRST DRAFT of the Judgment, which was also sent to the Judge's Office and the Judge's Office stated the following:

1. *Reunification counseling – page 3, line 1 of the transcript states it is to be at Mr. King's costs.*

2. *Arrears – we need to know where the date of 3/29/23 came from. The date of the hearing was 3/26/24.* **(Change was made by Lawdins)**

3. *Child support – we need to know where the date of 3/29/23 came from.* **(This was the date of judicial demand that the stipulated amount applied to)**

4. *Restraining order – United States is stated in page 4, line 25 of the transcript.*

5. *Contempt – The Court agrees that the language following the paragraph setting a date for pending contempt rules is unnecessary and should be removed.* **(Paragraph was removed by Lawdins)**

Lastly, after the Court commented to our letter, Lawdins revised the draft of the Judgment, which is the attached 'Draft of Final King v Colston 03-26-2024 Stipulated Judgment'. Now, we are waiting on the Judge to sign the 'Draft of Final King v Colston 03-26-2024 Stipulated Judgment', and will provide to you once we

get it. If the Judge still thinks something needs to changed or removed from the 'Draft of Final King v Colston 03-26-2024 Stipulated Judgment', their office will let us know.

Thanks,

Baleigh Conner

Paralegal to Dustan J. Abshire

& Krissy J. Dupre

Abshire Law Firm, L.L.C.

334 Kirby Street

Lake Charles, LA 70601

Direct Line: 337.564.3584

Office Telephone: 337.419.2024

Office Facsimile: 337.602.6757

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From: John King <johncjking86@gmail.com>
Sent: Thursday, July 11, 2024 9:59 AM
To: baleigh@abshirelawfirm.com
Subject: Circulated judgment

Baleih

Please forward me a copy of the 5 page judgement and certificate that was signed and circulated all I need is what was sent to judge Redd the final copy

It is an emergency and I have to have it for court.

Also the motion to withdraw was submitted July 3 please I need both copies today and I need the judgement it's an emergency to have it before my 1 pm appointment

I never saw the final copy and you withdrew without telling me it had been signed or letting me know it was filed with the clerk

It is an emergency and I will have to contact the judges chambers to obtain it my lawyer in Nj needs it today at latest

Thank you

J.C.J. King

--

J.C.J. King

---

3 attachments

Draft of Final King v Colston 03-26-2024 Stipulated Judgment.pdf
135K

King vs. Colston 2021-2773 - Stipulation Only - March 26, 2024.pdf
5036K

King vs. Colston 2021-2773 - letter re Stipulations from court on 3-26-24.pdf
6985K

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr	)	**CASE NO.: 2021-2778**	)
	)		
v	)		
	)		
Charmaine Y. Colston			

Calcasieu
H. Lynn Jones, II
Brittany McLaughlin
Suit#2021-2773 A
E-Filed on: 6/21/23 10:56 PM
# of Pages:34

Case # 2021- 2773
King vs Colston
Exhibits to accompany Motions to Dismiss, Motions for Contempt, Motions for Reconsideration Filed by King 06/12/2023

EXHIBITS

Unethical communication hidden from Judge Redd by Attorney Lawdins and Colston. See in emails dated June 01,2022 less than 24 hrs after stipulated judgment the REAL reason these frivolous and illegals petitions were filed by Lawdins. Nothing to do with my children Judge Redd court was used to fight criminal cases and because I would not drop restraining orders she continued to withhold my children as reference in threats from Attorney Lawdins attached. Additionally find where I had requested in April 30 days prior to see my children for summer visitation Colston denied access, then lied in court saying my daughter was too busy to see me although I'd spent thousands on flights and travel. Charmaine immediately started calling and harassing me after court to attempt to get me to have sex and cheat on my wife when I would not do it she issued a threat saying I was ignoring my daughters calls.

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) CASE NO.: 2021-2778)

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Charmaine Y. Colston

Re: DNA in King v Colston External Inbox ×

charmaine colston <charmaineycolston@gmail.com>
to Scott, lawdinslaw, Assistant

Good Morning all,

I hope you are doing well.

As of 6:30 a.m. this morning, I have not received the email from King. I took off today, to take care of tl

Please also note, our daughter texted King on yesterday, he never replied. When she called him after

They were scheduled to attend CPSO reality check course this morning and our daughter was attendi

He is not working, yet failed to give his intended visitation dates for June and July, in court. But, it is ur

Settling this outside of court is not an issue for me. I prefer to do so. However, it is clear he is not tryin

I understand every evil devise they had for me, did not prevail ;therefore, they are butt-hurt.

If the children are his/the focus, it should not matter what did not go someone else's way.

I would like to get the DNA test done today, I do not plan to take off again from work.

Though King is not complying, Please advise if I should go to Texas w/o the requested/required link or

Thank you,
Charmaine Y. Colston

" God is within her, she will not fall."
Psalm 46:5

PARISH COURT OF THE STATE OF LOUISIANA
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John Clifford J King Sr) CASE NO.: 2021-2778)

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Charmaine Y. Colston

From: lawdinslaw@gmail.com <lawdinslaw@gmail.com>
Sent: Wednesday, June 1, 2022 10:20 AM
To: Scott Hawkins <scott@scotthawkinslaw.com>
Cc: Assistant Lawdins Law <lawdinslawassistant@gmail.com>
Subject: King v. Colston

Scott,

Please advise if your client will send the link. My client emailed this morning and I have a feeling that your client will continue no contact with the children and this will have us back in court. Please note that my client is trying to work with your client for their children but she will not be amenable much longer if he demonstrates no effort. As an aside, it appears that the NJ TRO is still in effect and his mother's address is listed as a place my client cannot go. The children will be staying there and in the event that something occurs and my client must go there your client will institute criminal proceedings and my client won't take that chance given his track record. Please advise if he will dismiss or remove the mother's address or we will back in court ASAP on this issue. I don't find her request unreasonable since the children will be located there. Please advise if we can find a resolution on this issue. Thank you.

Sincerely,

Orelia Lawdins-Trent , J. D., M. S.

Attorney . Certified Mediator

Lawdins Law & Associates

(A limited liability company)

1540 Martin Luther King Hwy., Ste. A

Lake Charles, LA 70601

Mail to:

P. O. Box 16351

Lake Charles, LA 70616

Phone: 337.275.5124

Facsimile: 337.275.5125

Lawdinslaw@gmail.com

Evidence above that they conspired to make the agreement about an out of state NJ restraining order. This is

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Charmaine Y. Colston

Re: Children Inbox

Charmaine Colston
Sent Apr 15, 2022 at 3:01 PM

To: John King Sr. (viewed Apr 15, 2022 at 3:25 PM)

Your father has informed us of your entrepreneur , girlfriend, who is technology advanced.

Your father also informed us of the pictures your girlfriend sends him of y'all on vacation and of you flying planes.

Your father also told us your girlfriend texts him the mornings of your hearings , asking that he " prays for you."

The same girlfriend you denied and claimed I made up.

The same girlfriend who does not want you talking to our children around me.

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

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Charmaine Y. Colston

Re: Children Inbox

Charmaine Colston
Sent Apr 15, 2022 at 12:15 PM

To: John King Sr. (viewed Apr 15, 2022 at 3:22 PM)

Furthermore,

The girlfriend you mentioned in your NJ statement, is whom created the " imaginary IG account."

Who is also the girlfriend you told our daughter about, when you went to their school ; You also told our daughter your girlfriend created the IG page to help.

Seems like your insecure girlfriend did more damage than anything.

It is also obvious your cougar does not have all the knowledge, after-all.

PARISH COURT OF THE STATE OF LOUISIANA
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John Clifford J King Sr) **CASE NO.: 2021-2778**)

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Charmaine Y. Colston

Re: Custody exchange Inbox

Charmaine Colston
Sent Feb 18, 2022 at 8:48 PM

To: John King Sr. (viewed Feb 18, 2022 at 9:14 PM)

You and I do not communicate and I do not get on here due to the level of toxicity.

Today was a busy day for us; time got away.

Though the children feel indifferent, due to your failure to communicate with them, I can meet you in the next 30 minutes.

You can explain to them why you tell them they can call you whenever; yet , every call is unsuccessful and you have yet to contact them.

They deserve to know.

Who is your family?

PARISH COURT OF THE STATE OF LOUISIANA
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Charmaine Y. Colston

8/11/2022

To Whom it May Concern:

Please be advised that John King Sr. is not allowed to visit nor check out Jayla King, without my consent. No one who is not listed on their school documents are allowed to do so.

Her mother/guardian,

Charmaine Y. Colston
337-499-0500
charmaineycolston@gmail.com
P.O. Box 19102
Lake Charles, La 70616

PARISH COURT OF THE STATE OF LOUISIANA
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Charmaine Y. Colston

Ms Colston wrote a letter to the schools denying my right as a joint custody parent. She also has never given the court the location of my youngest son's school.

EXHIBIT

CRIMINAL CASES EVIDENCE WHY SHE IS WITHHOLDING CHILDREN

PARISH COURT OF THE STATE OF LOUISIANA
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Charmaine Y. Colston

2021-00123665 Supplemental

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Supplemental Report
Complaint # 2021-00123665
Investigating Detective: Kent Castille

Suspect: Charmaine Colston (B/F)
Charge: LA R.S. 14:72 Forgery
14:67.26.C.2 Theft of Motor Vehicle from $5,000 but less than $25,000

Victim: John King (B/M)

Attachments:
3. Vehicle Title Information
4. King's Bank Statements
5. Southwest Louisiana Credit Union Documents
6. King's Work Documents

Evidence / Veripic Available Upon Request:
Audio Statement of John King

On October 12, 2021, I, Detective Kent Castille, was assigned a Forgery case for follow up investigation.

On October 18, 2021, I spoke with victim, John King, over the phone and obtained an audio statement in reference to a Forgery. King stated he learned his vehicle, 2011 red Chevrolet Traverse VIN 1GNKRJED5BJ22055 bearing the Louisiana License Plate 346EYM, was fraudulently forged into the subject's name, Charmaine Colston. King claimed he and Colston were in a romantic relationship that has since been terminated and during their relationship, King purchased the stated vehicle and listed it under his name only. King stated he and Colston were never married, had children together, and suffered a traumatic breakup. King allowed Colston to utilize his vehicle during and after the course of their relationship. King moved to New Jersey and left the stated vehicle at his mother's residence of 123 Louisiana Avenue and continued to allow Colston to utilize the vehicle. King stated he left one copy of the vehicle keys with his mother and one with Colston. King claimed he made most of the payments on the vehicle but Colston had assisted, unknown how much was contributed by either party. King claimed Colston obtained a copy of the title by placing her address as a secondary address for the title to be mailed to, the address being P.O. Box 19102 Lake Charles, LA. King stated he never authorized any secondary address for the vehicle title and the only address listed should have been 123 Louisiana Avenue. King stated he only allowed Colston to utilize the stated vehicle but never consented to her possessing ownership of it. King claimed he believed Colston obtained the vehicle title through Southwest Louisiana Credit Union (SWLACU) who he utilized to obtain a loan to purchase the vehicle. King stated he purchased the vehicle for an estimated $15,000.00.

On October 19, 2021, I traveled to Thib's Auto Titles and Tags, Inc (located on 3620 Gerstner Memorial Blvd) and requested a copy of the current title of the stated vehicle. Thib's employees were able to inform me the title was processed at Pedersen Title Co (located on 0411, 1700 E Prien Lake Rd #8) during the early part of October. I traveled to Pedersen and obtained a copy of the current title of the vehicle and noticed it was notarized on September 7, 2021, by Renee E Amos (ID 29374.) On the stated title was King's signature on the seller line. Pedersen employees were able to inform me Colston processed the title at the business on October 6, 2021. I was not able to review video footage of the transaction until October 25, 2021, due to the manager not being present. Once I reviewed the video surveillance, I observed a black female wearing a black V neck shirt, blue jeans, and sunglasses on October 6, 2021, at the hour of 1149AM. I was able to identify the female in the video footage as Colston. Due to a technical error with Pedersen's security system, I was unable to obtain a copy of the incident.

On October 26, 2021, I spoke with Amos over the phone and she stated all of her notary transactions require all parties to be present with their credentials. Amos claimed she had no memory of the specific transaction between King and Colston and stated she does not maintain any records as she is not required to by law. Amos specified numerous times during our conversation that she requires all parties to be physically present with their credentials. Amos claimed she had only conducted a few transactions through an online webcam and was confident the stated transaction was not done that way.

On October 26, 2021, I received a detailed copy of the vehicle's title from the email address of Franzel.Doucet@la.gov. I observed a Vehicle Application form that was processed by Colston and the current title of the stated vehicle. The title of the vehicle listed only King's name along with the two addresses of P.O. Box 19102 and 123 Louisiana Drive on the front. Attached was also a photo copy of Colston's Louisiana Driver's License that she produce to finalize the transaction. Attached was the current vehicle registration which showed the vehicle was sold and purchased for the price of $100.00 (listed on registration as "SPOV or Value.") The registration also listed Colston as the vehicle owner with the address of P.O. Box 19102.

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Charmaine Y. Colston

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602

I attempted to contact Colston by phone (337-438-9036 and 337-499-6021) but both phone numbers were disconnected. On October 26, 2021, I traveled to 1225 Country Club Rd, #5107, to attempt to speak with Colston. I received no answer at the door and left a card requesting a call back. On October 28, 2021, I received a call from Wilford Carter Law, LLC stating Carter will be representing Colston in regards to a case involving a Forgery. I began also receiving numerous calls from a Private phone number with my work office phone. I was not present at my desk to answer the stated phone calls and no voicemails were left. On October 29, 2021, I was able to answer a phone call from the Private number. As I answered the phone call, Colston identified herself and without being prompted in any way, Colston stated King provided consent for her to obtain ownership of his vehicle. I asked Colston if she would be willing to provide me a statement in person and she began discussing how King gave her permission to write his signature on the vehicle title. I was unable to record the conversation and I only vocalized the possibility of Colston providing me with a statement. Colston provided me with her most recent phone number, 337-526-1992, and continued to defend herself stating she was authorized by King to take ownership of his vehicle.

On October 28, 2021, I traveled to SWLACU and met with employees. I was informed the vehicle was purchased only under King's name and that Colston had filed a "Member to Member Authorization Form." I was informed this form was filed to allow Colston to make payments to King's account. Upon obtaining a copy of the stated form, I observed Colston listed the relationship to King as "Husband" with the two never being married. The form was processed on March 14, 2017, and had the member ID of Colston (1000059007) and King (1000058944) listed. Employees were able to inform me that they were contacted by King, who accused them of mistakenly giving Colston the title to his vehicle. I was informed the vehicle title was mailed to Colston due to the P.O. Box 19102 address having been placed on the title when the vehicle registration last renewed through the state. King confirmed he was not the one who renewed the vehicle registration and believed it was done by Colston. SWLACU had no part in mailing the vehicle title or dictating who would receive the stated title.

On November 2, 2021, I received, by email, from King, two documents that he completed with his job during the day of September 7, 2021, in New Jersey. The documentation stated King was in New Jersey conducting his professional duties at the location of 1640 New Market Ave, S. Plainfield, NJ 07080. The documentation stated King was occupied at the stated location from 12:00PM to 08:30PM. King also submitted his bank statements during the month of September to prove that he was not in or capable of being present in Louisiana when the vehicle title was transferred to Colston and notarized.

On November 2, 2021, I received a call from Carter who stated Colston will not provide a statement to me. Carter claimed the only information that Colston can provide is that she was authorized by King to transfer the vehicle title to her name.

This case is being forwarded to the District Attorney's Office for review.

All documents, audio, video and photos (if any) have been imported into the Aegis case, CPSO Portal and Veripic System. I observed numerous forms of documentation stating Colston to be the new registered owner of the stated vehicle with a photo copy of her Driver's License which she produced to finalize the process.

No further information at this time.
End of Report
Detective: Kent Castille
[redacted]

PARISH COURT OF THE STATE OF LOUISIANA
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John Clifford J King Sr) CASE NO.: 2021-2778)

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Charmaine Y. Colston

CPSO Case, Officer: CPSOAPPS\rtarver, Supervisor: CPSOAPPS\jneal, Merged By: CPSOAPPS\kbooth

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office
CASE REPORT
5400 S. Broad St.
Lake Charles, LA 70615

CASE# 2021-00123665

EVENT			
REPORTED DATE/TIME	OCCURRING INCIDENT TYPE		
10/9/2021 15:13	Forgery/Fraud		
OCCURRED FROM DATE/TIME	OCCURRED THRU DATE/TIME	LOCATION OF OCCURRENCE	
10/06/2021 08:00	10/09/2021 15:00	123 LOUISIANA AVE LAKE CHARLES, LA	

OFFENSES				
	STATUTE/DESCRIPTION		COUNTS	ATTEMPT/COMPLT
01	14:72 Forgery		1	Completed

SUBJECT							
VICTIM/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE, SUFFIX)					
Adult	Suspect	Colston, Charmaine Yvette					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted]	31	[redacted]					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black		Female	5'7 5'7	140 140	BRO	BRO	
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2		PHONE #3		
[redacted]		[redacted]					

SUBJECT							
VICTIM/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE, SUFFIX)					
Adult	Victim	King, John Clifford					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted]	35	[redacted]					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black		Male	6'0 6'0	250 250	BRO	BRO	
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2		PHONE #3		
[redacted]		[redacted]					

SUBJECT							
VICTIM/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE, SUFFIX)					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2		PHONE #3		

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	10/9/2021	Neal, Joshua C	10/10/2021

PARISH COURT OF THE STATE OF LOUISIANA
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John Clifford J King Sr) CASE NO.: 2021-2778)

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Charmaine Y. Colston

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Case Report

Summary

Print Date/Time: 08/25/2022 11:25
Login ID: cpsoapps\mhamolka
Case Number: 2021-00147277

Calcasieu Parish Sheriff's Office
ORI Number: LA0100000

Case

Case Number: 2021-00147277
Location: 123 LOUISIANA AVE
LAKE CHARLES, LA 70601
Reporting Officer ID: 12808 - Phillips

Incident Type: Forgery/Fraud
Occurred From: 12/09/2021 13:15
Occurred Thru: 12/09/2021 13:15
Disposition:
Disposition Date:
Reported Date: 12/09/2021 13:15 Thursday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	13B	14:38	Simple Assault	1
2	State	250	14:72	Forgery	1
3	State	250	14:133	Filing or Maintaining False Public Records	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect	1	Colston, Charmaine Yvette	[redacted]		Black	Female	[redacted] 32
Suspect	2	King, John Clifford			Black	Male	[redacted] 35
Victim	1	Society					
Victim	2	King, John Clifford			Black	Male	[redacted] 35

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.

Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License Plate	State

PARISH COURT OF THE STATE OF LOUISIANA
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John Clifford J King Sr) **CASE NO.: 2021-2778**)

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Charmaine Y. Colston

EXHIBIT

CHARMAINE COLSTON
HARASSING FROM VARIOUS
NUMBERS & PRETENDS TO
BE THE CHILDREN

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

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Charmaine Y. Colston



Ight big dawg Shid I thought this was the nigga screwing my old lady Keep it playa I'm screwing his old lady to

No I'm sorry to hear that...but if a Nigga is handling your woman and she ain't being true then you shouldn't drop to her level...have some morals about yourself because that eye for a eye shit will stress you out and have you losing yourself

I wish you luck and a better day than what it seems like your having..!!!

Preciate ya big dawg aint to many loyal ones out there snake in the grass homie shid she had this number in her phone saved as all

PARISH COURT OF THE STATE OF LOUISIANA
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Charmaine Y. Colston

+1 (832) 543-8119 ›

nighta

What's her name

My old lady r your old lady

Emily

Shid this was just last week big dawg



PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

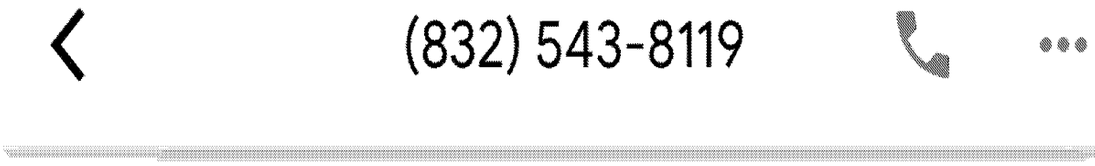
John Clifford J King Sr) **CASE NO.: 2021-2778**)

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Charmaine Y. Colston



Grow up . You're desperate. Pretending to be a dude? That's why your children falling in toilets stuffing rollers cause you're a how busy sending nudes.

*hoe

3:34 PM

Aye you got the wrong number patna

Sounds like you insecure about your man. How are those herpes ?

PARISH COURT OF THE STATE OF LOUISIANA
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John Clifford J King Sr) **CASE NO.: 2021-2778**)

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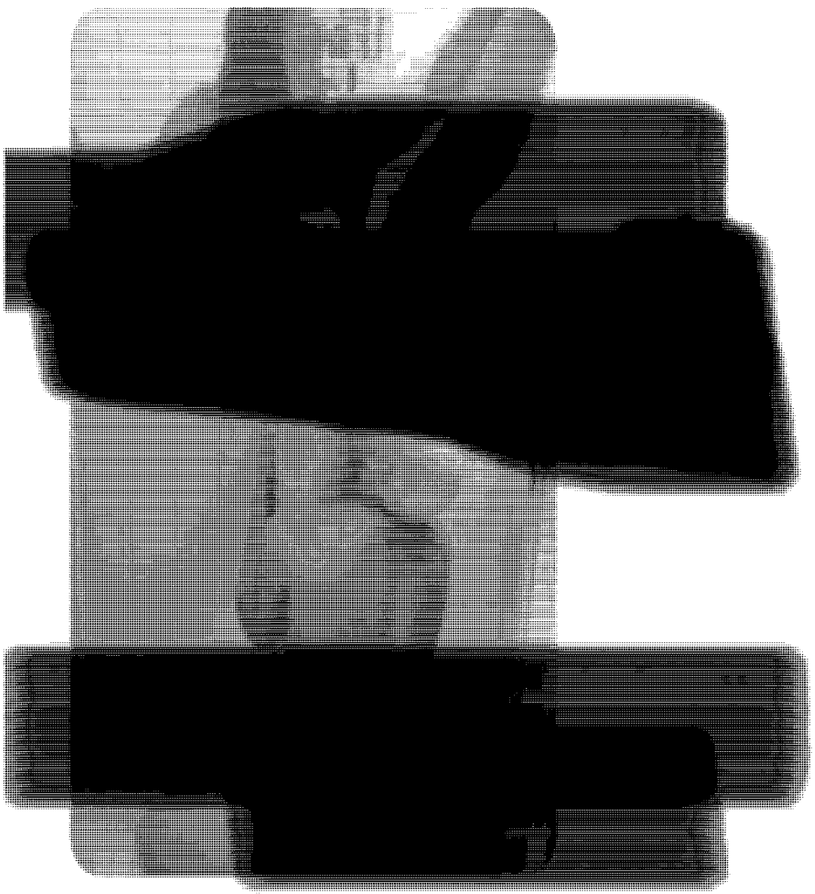
)

Charmaine Y. Colston

+1 (845) 288-4162

Text Message
Sun, Nov 21, 10:19 PM

Missing you



The sender is not in your contact list.

Report All Messages

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

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v)

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Charmaine Y. Colston

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vvya

10/9/21, 1:24 PM

Dad

Can u answer my calls please

Y u not answering my calls

N y u don't wanna get us

10/12/21, 7:24 PM

Can u call me please

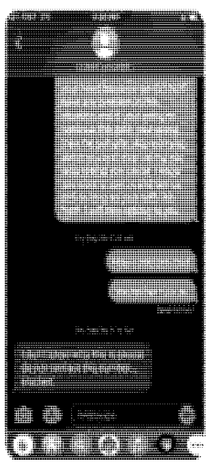
10/12/21, 10:48 PM

Dad

10/13/21, 7:41 AM

Dad

10/13/21, 6:12 PM



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Charmaine Y. Colston

Messages - No Name

Why you block me dad who is that who is that I am not lying you are You told me you have a special friend and she is the girl who text my phone and you did nothing about it but ignore our calls she hacked your accounts posted mom emails to you on her Instagram you a liar I don't know you anymore you don't luv us

12/8/21, 8:29 PM

Dad

I called u can u answer me

Im tired of your games

U n that crazy girl leave me alone u are a liar Ik she's with u stop playing on my phone

Im not the little girl you deserted u left me n my brothers u lied to us we heard dat girl n the background she told u not to speak to us she is crazy dad n u let her keep u from talking to us dats no luv

[redacted]

12/8/21, 8:44 PM

PARISH COURT OF THE STATE OF LOUISIANA
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Charmaine Y. Colston

Exhibit:

Jayla King admitting mother beats them + Charmaine constant harassment takes mental strain and psychological toll on children

PARISH COURT OF THE STATE OF LOUISIANA
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John Clifford J King Sr) **CASE NO.: 2021-2778**)

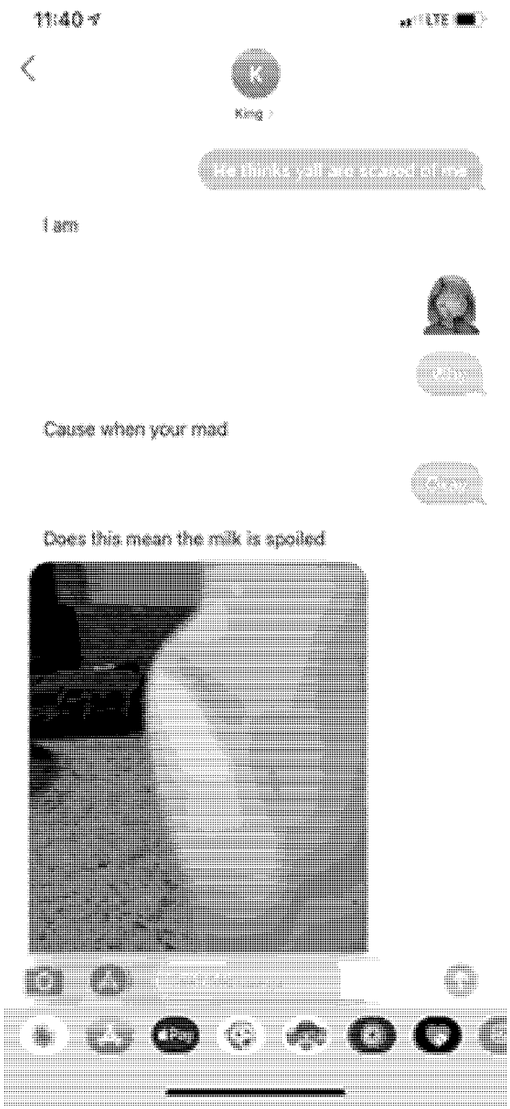
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Charmaine Y. Colston





PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

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Charmaine Y. Colston



EXHIBIT

PARISH COURT OF THE STATE OF LOUISIANA
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Charmaine Y. Colston

History of Dangerous Threats from Charmaine Colston towards King.

Charmaine illegally harassing John King Sr while under restraining order, and also filing motions for a criminal restraining order against King if King does not entertain her sexual advances she repeatedly daily and constantly details step by step how she will withhold his children and that he has to choose his wife or his kids but she will withhold eventually forcing reunification therapy and Kings parental rights taken.

I warned of this in August 2022 that Colston said she would withhold which would end in mandatory therapy stripping me of overnight visitation because I will not "meet her alone bring no one else" at 10:30 pm to convince her to convince my children to see me.

She asks for criminal restraining orders but is still calling and texting me breaking court orders and won't use the OFW app in over a year.

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Charmaine Y. Colston

Don't transfer their 2k by the 1st and see!

Fuck you and the bitch you with!

Wait til your job is up! YOU WILL REALLY FUCKING SEE!

You think you haven't seen them in four months !

You won't bitch !

Stay with the hoe you with!

Send their money MONTHLY AND WE DONT NEED SHIT ELSE FROM U

PARISH COURT OF THE STATE OF LOUISIANA
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Charmaine Y. Colston

Exhibit: Lakoshia Roberts quit on May 30,2023 before she was ever enrolled or hired.

PARISH COURT OF THE STATE OF LOUISIANA
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John Clifford J King Sr) **CASE NO.: 2021-2778**)

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Charmaine Y. Colston

As I have told you multiple times, the 14th Judicial District Court judges do not permit children to testify. Also, you said you did not have the money for a counselor or a curator, and I told you you could not say that with certainty because at that time you had not even called and inquired if any of the counselors accept Medicaid.

It is clear that you will not follow my legal advice, and as such, I cannot continue to represent you.

...

T **me** May 30

to La, Roshonda

Ms Roberts

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

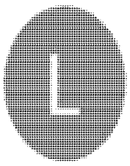
John Clifford J King Sr) **CASE NO.: 2021-2778**)

)

v)

)

Charmaine Y. Colston



La Koshia Roberts May 30

to me, Roshonda

Mr. King,

I will not allow you to falsely accuse me of saying something that I did not say. I NEVER said you were the problem, and your accusation leads me to know that you are determined to handle this case your way, regardless of whether it violates the judge's order. I told you Judge Redd said he will be issuing a separate order directing the parties and the children to begin reunification counseling. You made it abundantly clear during our telephone conversation this afternoon that you were opposed to the counseling, and I told you that if you did not comply, you would likely

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

)

v)

)

Charmaine Y. Colston

EXHIBITS 10 FLIGHTS TO
SEE MY CHILDREN

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

)

v)

)

Charmaine Y. Colston

United Airlines, Inc. <Receipts@united.com> Wed, Nov 3, 2021 at 7:50 PM
To: JOHNCJKING86@gmail.com

UNITED

Wed, Nov 03, 2021

Thank you for choosing United.

A receipt of your purchase is shown below Please retain this email receipt for your records

Note: There are travel restrictions in place due to the coronavirus. Check our Important notices page for the latest updates

Get ready for your trip: Visit the Travel Ready Center, your one stop digital assistant, to find out about important travel requirements specific to your trip.

Confirmation Number:
[redacted]

Flight 1 of 4 UA2264 Class: United Economy (V)

Thu, Nov 25, 2021	Thu, Nov 25, 2021
11:55 AM	03:01 PM
New York/Newark, NJ, US (EWR)	Houston, T , US (IAH)

Flight 2 of 4 UA4318 Class: United Economy (V)

Thu, Nov 25, 2021	Thu, Nov 25, 2021
04:20 PM	05:18 PM
Houston, TX, US (IAH)	Lake Charles, LA, US (LCH)

Flight Operated by Commutair dba United Express

Flight 3 of 4 UA4877 Class: United Economy (V)

Mon, Nov 29, 2021	Mon, Nov 29, 2021
05:50 PM	06:53 PM
Lake Charles, LA, US (LCH)	Houston, TX, US (IAH)

Flight Operated by Commutair dba United Express

Flight 4 of 4 UA1520 Class: United Economy (V)

Mon, Nov 29, 2021	Tue, Nov 30, 2021
07:45 PM	12:09 AM
Houston, TX, US (IAH)	New York/Newark, NJ, US (EWR)

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

)

v)

)

Charmaine Y. Colston

Your United reservation for Lake Charles, LA, US (LCH) is processing
1 me age

United Airlines, Inc. <unitedairlines@united.com> Mon, Oct 4, 2021 at 1:47 PM
To: johncjking86@gmail.com, [redacted]

Add UnitedAirlines@news.united.com to your address book. See instructions

Monday, October 04, 2021

Flight itinerary for John King

John King has shared this upcoming United flight itinerary with you.

Message: Flight lake charles

Confirmation number: [redacted]

New York/Newark, NJ, US (EWR)
to Lake Charles, LA, US (LCH)

Purchase summary

1 Adult (18-64)	$612.09
Taxe and fee	$92.31
Additional ervice	
Preferred seats	$55.00
EWR to IAH John King	
LCH to IAH John King	
IAH to EWR John King	
Trip insurance *(Billed separately by)*	$45.79
)	
Total	**$805.19**

Credit card payment: $759.40 [redacted]) Billed by United
Credit card payment: $45.79 [redacted] Billed by

Trip summary

Fri, Oct 08, 2021

[redacted] UA 2264 1 Connection
5h 37m total

12:45 pm ✈ **3:37 pm** Duration: 3h 52m
United Economy (Q)

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

)

v)

)

Charmaine Y. Colston

Gmail John King <johncjking86@gmail.com>

Fwd: eTicket Itinerary and Receipt for Confirmation [redacted]

1 me age

[redacted] Tue, Jan 18, 2022 at 2:43 PM

To: John King <johncjking86@gmail.com>

[redacted]

UNITED Wed, Jan 12, 2022

Thank you for choosing United.

A receipt of your purchase is shown below. Please retain this email receipt for your records.

Note: There are travel restrictions in place due to the coronavirus Check our Important notices page for the latest updates

Get ready for your trip: Visit the Travel-Ready Center, your one-stop digital assistant, to find out about important travel requirements specific to your trip.

Confirmation Number:

[redacted]

Flight 1 of 2 UA341 Class: United Economy (K)

Sat, Jan 15, 2022
10:00 AM
New York/Newark, NJ, US (EWR)

Sat, Jan 15, 2022
01:24 PM
Houston, TX, US (IAH)

Flight 2 of 2 UA704 Class: United Economy (G)

Tue, Jan 18, 2022
06:41 PM
Houston, TX, US (IAH)

Tue, Jan 18, 2022
11:03 PM
New York/Newark, NJ, US (EWR)

Traveler Detail

KING/JOHN

eTicket number [redacted] Seats **EWR IAH 39B**

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) CASE NO.: 2021-2778)

)

v)

)

Charmaine Y. Colston

TF NOT!

STOP CALLING MY CHILDREN

FUCK YOU AND YOUR SORRY ASS PPL

MY KIDS WILL NEVER GO AROUND

TAKE YOUR BITCH

FATHER THAT HOE KIDS MF

Weak ass , tender dick ass nigga!!

Fuck every thang walking!!

Bitch but you have the nerve to bash me!!

A fucking joke

Like your daddy

Defend that MF like you defend

PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

)

v)

)

Charmaine Y. Colston



PARISH COURT OF THE STATE OF LOUISIANA
PARISH OF CALCASIEU

John Clifford J King Sr) **CASE NO.: 2021-2778**)

)

v)

)

Charmaine Y. Colston

(please reference Our Family Wizard app for the evidence in bold proving Colstons contempt)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Case Report

Summary

Print Date/Time: 08/25/2022 11:09
Login ID: cpsoapps\mhamolka
Case Number: 2021-00123665

Calcasieu Parish Sheriff's Office
ORI Number: LA0100000

Case

Case Number: 2021-00123665
Location: 123 LOUISIANA AVE
LAKE CHARLES, LA 70601
Reporting Officer ID: 10129 - Tarver

Incident Type: Forgery/Fraud
Occurred From: 10/06/2021 08:00
Occurred Thru: 10/09/2021 15:00
Disposition:
Disposition Date:
Reported Date: 10/09/2021 15:13 Saturday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	250	14:72	Forgery	1
2	State	240	14:67.26.C.(2)	Theft of a Motor Vehicle from $5,000 but less than $25,000	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect	1	Colston, Charmaine Yvette	[redacted]		Black	Female	[redacted] 31
Victim	1	King, John Clifford			Black	Male	[redacted] 35

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
10/09/2021	Stolen/Etc	03 Automobile	Chevrolet	See Description			

Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License Plate	State
1	Other Vehicle	Motor Vehicle	2011	Chevrolet	See Description	Red	346EYM	LA

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

STEPHEN C. DWIGHT
District Attorney
FOURTEENTH JUDICIAL DISTRICT
CALCASIEU PARISH

JACOB L. JOHNSON
First Assistant
DISTRICT ATTORNEY

P.O. Box 3206
Lake Charles, LA 70602
Phone: 337-437-3400
Fax: 337-437-3325

August 4. 2022

Calcasieu Parish Sheriff's Office
Kent Castille, 10450
Report #: 21-123665

Defendant: Charmaine Yvette Colston B/F DOB: [redacted]

Action/Status	Statute	Charge	Offense Date	Warrant
NP-Not a Criminal Matter	14:67.26.C(2)	Theft of a motor vehicle between five thousand and twenty-five thousand dollars	10/09/2021	
NP-Not a Criminal Matter	14:72.A	Forgery	10/09/2021	

NOTES/COMMENTS/OTHER REQUIREMENTS:

REVIEWED BY: **Joseph Williams**

The information requested MUST be forwarded to this office within THIRTY (30) DAYS of the date of this advisement. When forwarding a follow-up and/ or warrant, please attach a copy of this advisement.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office
TONY MANCUSO, SHERIFF AND EX-OFFICIO TAX COLLECTOR
Parish of Calcasieu • 5400 E. Broad Street • Lake Charles, LA 70615
Phone (337) 491-3700 • Fax (337) 494-4522

CPSO OFFENSE REPORT RECEIPT

Complaint # 21-123665 Investigating Deputy _____

List of evidentiary items attached to the report for consideration by D.A.'s Office:

One disc containing audio interview for John King

List of evidentiary items attached to this report electronically via Veripic:

Received by Calcasieu Parish District Attorney's Office 2/23/22 (Date) 4pm (Time)

Printed name of D.A. Representative receiving report Lacey Blackburn

Signature of D.A. Representative receiving report _____

If there is a question or a need for immediate assistance associated with this report; the investigating officer may be contacted by email. Please always copy the listed supervisor.

Investigating Deputy _____ Email _____

CPSO Supervisor _____ Email _____

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

OFFENSE REPORT CHECKLIST

The following are tasks that should be completed prior to a report being submitted to the prosecutor.

JBL The investigation is either complete or in a state where a report needs to be submitted.

JBL The report indicates that, if applicable, the victim or victim's family has been contacted and informed of the status of the investigation.

JBL The report indicates that, all items of evidence collected have been properly submitted to evidence, records or photographic services and either scanned into the CPSO computer system by the assigned investigative assistant or investigator.

JBL The report contains an exhaustive list of items collected, whether stored in records or evidence, and the list of items collected has been placed on the CPSO Offense Report Receipt to make it easy for the prosecutor to see what information he/she should have access to for immediate consideration.

JBL The report has been preserved in the appropriate CPSO computer program and all available evidentiary attachments have been scanned into the CPSO computer system.

JBL A copy of all evidentiary items that can be replicated, digitally or otherwise, is attached to the report. This may not be necessary in certain limited circumstances.

N/A If the investigation is ongoing, that fact has been referenced in the original report to put the prosecutor on notice that more information may be available at a later date.

N/A If applicable, any in car video needed as evidence has been properly tagged and Photographic Services has been notified to transfer said video to the D.A.'s Server.

This report, complaint # 2021-00123665 , and the associated evidentiary attachments are ready to be submitted to the District Attorney's Office for review.

James Leubner
Supervisor's Signature

11/03/2021
Date

James Leubner
Supervisor's printed name

Financial Crimes
Division

NOTES: _____

OfficerID: CPSOAPPS\rtarver, Supplemental Narrative

On 10-09-21 at approximately 1500 hours I, Sgt. Ryan Tarver, was working that patrol desk when approached by the complainant, John King, who wished to file a report in reference to a forged title. King reported his ex-girlfriend, Charmaine Colston, some how obtained the title to his vehicle, a Red 2011 Chevrolet Traverse, as he had just paid it off. King alleged Colston obtained the title and forged his signature. When I ran the vin number, 1GNKRJED5BJ220559, it returned to Charmiane. King advised he had no other proof of ownership of the vehicle at this time. At this time there is nothing further.
EOR/NFI

OfficerID: CPSOAPPS\rtarver, INITIAL REPORT

21-123665 SGT RYAN TARVER COMPLETED AN OFFENSE REPORT IN REFERENCE TO A FORGED TITLE. THE COMPLAINANT FILED A REPORT AT THE SHERIFF'S OFFICE IN REFERENCE TO HIS EX-GIRLFRIEND OBTAINING HIS TITLE AND FORGING HIS SIGNATURE.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office
TONY MANCUSO, SHERIFF AND EX-OFFICIO TAX COLLECTOR
Parish of Calcasieu • 5400 E. Broad Street • Lake Charles, LA 70615
Phone (337) 491-3700 • Fax (337) 494-4522

CPSO OFFENSE REPORT RECEIPT

Complaint # 2021-00123665 Investigating Deputy Det. Kent Castille

List of evidentiary items attached to the report for consideration by D.A.'s Office:

1. Initial Report
2. Supplemental Report
3. Vehicle Title Information
4. King's Bank Statements
5. Southwest Louisiana Credit Union Documents
6. King's Work Documents

RECEIVED
NOV 08 2021
DA / INTAKE

Date Time

Signature of D.A. Representative receiving report

If there is a question or a need for immediate assistance associated with this report; the investigating officer may be contacted by email. Please always copy the listed supervisor.

Investigating Deputy Kent Castille

CPSO Supervisor James Leubner

[redacted]

CPSO Case, Officer: CPSOAPPS\rtarver, Supervisor: CPSOAPPS\jneal, Merged By: CPSOAPPS\kbooth

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT CASE# **2021-00123665**

5400 E. Broad St.
Lake Charles, LA 70615

EVENT

REPORTED DATE/TIME	OCCURRED INCIDENT TYPE	
10/9/2021 15:13	Forgery/Fraud	

OCCURRED FROM DATE/TIME	OCCURRED THRU DATE/TIME	LOCATION OF OCCURRENCE
10/06/2021 08:00	10/09/2021 15:00	123 LOUISIANA AVE LAKE CHARLES, LA

OFFENSES

	STATUTE/DESCRIPTION	COUNTS	ATTEMPT/COMMIT
01	14:72 Forgery	1	Completed

SUBJECT

JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)					
Adult Suspect	Colston, Charmaine Yvette					
DOB / AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted] 31	[redacted]					
RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black	Female	5'7 5'7	140 140	BRO	BRO	
DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3			
[redacted]	[redacted]					

SUBJECT

JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)					
Adult Victim	King, John Clifford					
DOB / AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted] 35	[redacted]					
RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black	Male	6'0 6'0	250 250	BRO	BRO	
DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3			
[redacted]	[redacted]					

SUBJECT

JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)					
DOB / AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3			

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	10/9/2021	Neal, Joshua C	10/10/2021

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.
Lake Charles, LA 70615

CASE# **2021-00123665**

GENERAL PROPERTY

GENERAL	PROPERTY CODE			VALUE
	Counterfeit/Forged			**$1.00**
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
		77 Other		
	ITEM DESCRIPTION			
	FORGED TITLE			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	**10/9/2021**	**Neal, Joshua C**	**10/10/2021**

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.

Lake Charles, LA 70615

CASE# **2021-00123665**

INITIAL NARRATIVE

21-123665 SGT RYAN TARVER COMPLETED AN OFFENSE REPORT IN REFERENCE TO A FORGED TITLE. THE COMPLAINANT FILED A REPORT AT THE SHERIFF'S OFFICE IN REFERENCE TO HIS EX-GIRLFRIEND OBTAINING HIS TITLE AND FORGING HIS SIGNATURE.

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	10/9/2021	Neal, Joshua C	10/10/2021

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.

Lake Charles, LA 70615

CASE# **2021-00123665**

SUPPLEMENTAL NARRATIVE

On 10-09-21 at approximately 1500 hours I, Sgt. Ryan Tarver, was working that patrol desk when approached by the complainant, John King, who wished to file a report in reference to a forged title. King reported his ex-girlfriend, Charmaine Colston, some how obtained the title to his vehicle, a Red 2011 Chevrolet Traverse, as he had just paid it off. King alleged Colston obtained the title and forged his signature. When I ran the vin number, 1GNKRJED5BJ220559, **it returned to Charmiane. King advised he had no other proof of ownership of the vehicle at this time. At this time there is nothing further.**

EOR/NFI

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	**10/9/2021**	**Neal, Joshua C**	**10/10/2021**

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

☑ STRUCTURAL STEEL ☐ PIPE ☐ CURTAIN WALL ☐ PRECAST
☐ LIGHT GAUGE STEEL ☐ MISC. STEEL

CLIENT: JP Morgan Chase
DATE: 09/07/2021
PROJECT: JP Morgan Chase - 270 Park Ave P3 Core and Shell
FTC NO.: JPMC118P3
PROJECT LOCATION: 270 Park Avenue, New York, NY 10017
PAGE NO.: 1 OF 3
SHOP LOCATION: 1640 New Market Ave, S. Plainfield, NJ 07080
INSPECTOR: John King
WELDING CONTRACTOR: Banker Steel Company
TIME IN: 12:00 pm TIME OUT: 8:30 pm

DESCRIPTION OF INSPECTION:
Monitoring the in process welding and fabrication of: 4082C004, 4082C005

LOCATION OF INSPECTION:
Banker Steel, South Plainfield, NJ Shop 7

REFERENCE DRAWINGS BY / DRAWINGS NO. / DATE / REVISION DATE:
TR.TJ/4082C004/11.16.2020/03.11.2021/R1 NT.MM/4082C005/11.11.2020/03.11.2021/R1

MATERIAL TYPE: A572-Gr 50 CVNA

WELD CHECKLIST	INSPECTION RESULTS Accepted	Rejected
Joint Type: ☐ Fillet ☑ Groove ☐ _____	√	
Welding Process: SAW, FCAW	√	
Electrode: E70T-1C(Lincoln XP70), E71T-1C(HDC, UC71), F7A2-EM12K(L61)	√	
Size of Weld: Various	√	
Final Visual Inspection	*	

Welder 1:	B. Thomas	**Cert. No. :**	41054	**Expiration:**	*
Welder 2:	C. Dimaggio	**Cert. No. :**	4690	**Expiration:**	*

REMARKS:
Welder #3 C. Candelario 4715*

* See Banker Steel management for WQR expiration dates.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-84
(Rev 01/05/17)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	DATE:	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	FTC NO.:	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	PAGE NO.:	2 OF 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	INSPECTOR:	John King
WELDING CONTRACTOR:	Banker Steel Company	TIME IN:	12:00 pm TIME OUT: 8:30 pm

4082C004 - bp2684, bp2649 - Welder #2, Welder #3 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

4082C005 - bp2684, bp2649 - Welder #1 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	3 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

NON CONFORMANCES: N/A

Inspections Witnessed: N/A

Final Inspection: N/A

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

☑ STRUCTURAL STEEL ☐ PIPE ☐ CURTAIN WALL ☐ PRECAST
☐ LIGHT GAUGE STEEL ☐ MISC. STEEL

CLIENT: JP Morgan Chase
DATE: 09/07/2021

PROJECT: JP Morgan Chase - 270 Park Ave P3 Core and Shell
FTC NO.: JPMC118P3

PROJECT LOCATION: 270 Park Avenue, New York, NY 10017
PAGE NO.: 1 OF 4

SHOP LOCATION: 1640 New Market Ave, S. Plainfield, NJ 07080
INSPECTOR: John King

WELDING CONTRACTOR: Banker Steel Company
TIME IN: 12:00 pm TIME OUT: 8:30 pm

DESCRIPTION OF INSPECTION:
Monitoring the welding and fabrication of: 1A271G04, 3091C006

LOCATION OF INSPECTION:
Banker Steel, South Plainfield, NJ Shop 9

REFERENCE DRAWINGS BY / DRAWINGS NO. / DATE / REVISION DATE:
VS.PN/3091C006/11.10.2020/03.31.2021/R2

MATERIAL TYPE: A572-Gr 50

WELD CHECKLIST	INSPECTION RESULTS	
	Accepted	Rejected
Joint Type: ☑ Fillet ☑ Groove ☐ _____	√	
Welding Process: FCAW, SAW	√	
Electrode: E70T-1C(Lincoln XP70), E71T-1C(HDC, UC71), F7A2-EM12K(L61)	√	
Size of Weld: Various	√	
Final Visual Inspection	√	

Welder 1: G. Capobianco Cert. No.: 4600 Expiration: *
Welder 2: C. Lares Cert. No.: 4701 Expiration: *

REMARKS:

* See Banker Steel management for WQR expiration dates.

John King
FTC Inspector

Client's Representative

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

3091C006 - BP31, BP2372, BP32 - Welder #1, Welder #2 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	DATE:	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	FTC NO.:	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	PAGE NO.:	3 OF 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	INSPECTOR:	John King
WELDING CONTRACTOR:	Banker Steel Company	TIME IN: 12:00 pm	TIME OUT: 8:30 pm

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/18)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	4 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

NON CONFORMANCES: 1A271G04 piping porosity the entire length of weld.

Inspections Witnessed: N/A

Final Inspection: 1A271G04 failed.

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

5. Southwest Louisiana Credit Union Documents

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Details

GENERAL

Record Type	Lien Holder Code	Transaction.Office Number	Imported	Brand Flags
Lien Notification	ELSE	254	10/9/2018 10:00 AM	

VEHICLE

Vehicle Make	Vehicle Year	VIN
CHEV	2011	1GNKRJED5BJ220559

OWNER

Owner Name	Extended Name	Owner Address	Domicile Code
JOHN CLIFFORD KING		[redacted]	1001

LIEN

Transaction Date	Lien Holder Filing Date	Secondary Mail Type	Secondary Mail Name	Secondary Mail Address
10/8/2018 12:00 AM	10/4/2018 12:00 AM			

MAINTENANCE

Request Made	Requesting User Name	Maintenance Request Type
4/13/2021 8:05 AM	rharrington	Lien Satisfied, Mail to Owner

ADDITIONAL INFORMATION

Loan Number	Contact Number

Notes

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Southwest
LOUISIANA CREDIT UNION

MEMBER TO MEMBER AUTHORIZATION FORM

Print to CDP Manage and Save as an Account Change Card

Member Name: CHARMAINE COLSTON

Member Number: 1000059007

Allow access to transfer to the following:

Member Name	Member Number	Relationship
JOHN KING	1000058944	HUSBAND

I, CHARMAINE COLSTON do hereby authorize Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I understand that any changes must be made by me in person at the Credit Union. I am aware that I'm allowed to make transfers only to other members share accounts and I'm not authorized to make inquiries on these accounts.

Member Signature [signature] Date: 3/14/17

I, _____ do hereby revoke Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I am aware that by revoking such authorization, I am no longer allowed to make transfers to these members share accounts

Member Signature _____ Date: _____

MSR: AW MSR #: 012

4. King's Bank Statements

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Capital One

John King
20011 Diamond Hills Ln
Katy TX 77449-5809

John King,
Did you know you can manage your money quickly and conveniently with the Capital One mobile app?
Scan this QR Code with your phone's camera to download the top rated Capital One Mobile app.

Here's your **September 2021** bank statement.

STATEMENT PERIOD
Sep 1 - Sep 30, 2021

$4,211.53 TOTAL ENDING BALANCE IN ALL ACCOUNTS

Account Summary

ACCOUNT NAME	Sep 1	Sep 30
[redacted]	$2,299.64	**$4,210.05**
	$1.48	**$1.48**
	$2,301.12	**$4,211.53**

Cashflow Summary

+ $0.17 INTEREST EARNED THIS PERIOD
− $0.00 FEES THIS PERIOD
− $0.00 FINANCE CHARGES THIS PERIOD

John King | STATEMENT PERIOD Sep 1 - Sep 30, 2021

[redacted]

0.10%	$1.65	30
ANNUAL PERCENTAGE YIELD (APY) EARNED	YTD INTEREST AND BONUSES	DAYS IN STATEMENT CYCLE

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 1	**Opening Balance**			**$2,299.64**
Sep 1	Debit Card Purchase - NJT RAIL MYTIX 973 2755555 NY	Debit	**- $9.00**	$2,290.64
Sep 1	Digital Card Purchase - AMZN MKTP US 257SJ2F52 AMZN COM BIL WA	Debit	**- $13.54**	$2,277.10
Sep 2	Withdrawal from DISCOVER E-PAYMENT	Debit	**- $1,000.00**	$1,277.10
Sep 2	Deposit from 3428 FUTURE TECH DIRDEP	Credit	**+ $3,056.90**	$4,334.00
Sep 2	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	**- $4.61**	$4,329.39
Sep 2	Debit Card Purchase - NJT RAIL MYTIX 973 2755555 NY	Debit	**- $9.00**	$4,320.39
Sep 2	Debit Card Purchase - EDISON PARKING LOT EDISON NJ	Debit	**- $5.00**	$4,315.39
Sep 2	Debit Card Purchase - AMZN MKTP US 252JL1N72 AMZN COM BIL WA	Debit	**- $18.07**	$4,297.32
Sep 3	Preauthorized Withdrawal to SOUTHWEST LOUISIANA CREDIT UNION savings account XXXXXX8944	Debit	**- $600.00**	$3,697.32
Sep 3	Debit Card Purchase - PARKFAST 010 NEWARK NJ	Debit	**- $90.00**	$3,607.32
Sep 3	Debit Card Purchase - EDISON PARKING LOT EDISON NJ	Debit	**- $5.00**	$3,602.32
Sep 4	Debit Card Purchase - MARSHALLS 140 PASSAIC KEARNY, NJ US	Debit	**- $120.29**	$3,482.03
Sep 5	Debit Card Purchase - WHOLEFDS NWK#105 609 B NEWARK, NJ US	Debit	**- $8.73**	$3,473.30
Sep 5	Debit Card Purchase - NJT RAIL MYTIX 973 2755555 NY	Debit	**- $9.00**	$3,464.30
Sep 5	Debit Card Purchase - SQ FACELOOK BARBER SH SOUTH PLAINF NJ	Debit	**- $45.00**	$3,419.30
Sep 7	Withdrawal from DISCOVER E-PAYMENT	Debit	**- $2,500.00**	$919.30
Sep 7	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	**- $4.75**	$914.55
Sep 7	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD	Debit	**- $2.65**	$911.90

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
	NJ			
Sep 7	Debit Card Purchase - EDISON PARKING LOT EDISON NJ	Debit	- $5.00	$906.90
Sep 7	Debit Card Purchase - HARRISON S BAGEL SHOP HARRISON NJ	Debit	- $14.67	$892.23
Sep 7	Digital Card Purchase - AMZN MKTP US 252CT2I51 AMZN COM BIL WA	Debit	- $20.25	$871.98
Sep 7	Debit Card Purchase - NJT RAIL MYTIX 973 2755555 NY	Debit	- $5.25	$866.73
Sep 8	Withdrawal for $1500 was Rejected			$866.73
Sep 9	Weekending 8,29,2021 - Check Deposit (Mobile)	Credit	+ $875.00	$1,741.73
Sep 9	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $5.36	$1,736.37
Sep 9	Debit Card Purchase - CASH APP [redacted] 4153753176 CA	Debit	- $600.00	$1,136.37
Sep 10	Debit Card Purchase - MCDONALD S F6978 NEWARK NJ	Debit	- $16.70	$1,119.67
Sep 10	Debit Card Purchase - SQ BLACK SWAN ESPRESS NEWARK NJ	Debit	- $5.10	$1,114.57
Sep 12	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $5.46	$1,109.11
Sep 12	Debit Card Purchase - MCDONALD S F35893 SOUTH PLAINF NJ	Debit	- $11.71	$1,097.40
Sep 12	Debit Card Purchase - DISNEY PLUS BURBANK CA	Debit	- $15.11	$1,082.29
Sep 13	Withdrawal from NAVIENT NAVI DEBIT	Debit	- $100.00	$982.29
Sep 13	Withdrawal from DISCOVER E-PAYMENT	Debit	- $500.00	$482.29
Sep 13	Withdrawal for $1500 was Rejected			$482.29
Sep 13	Digital Card Purchase - AMZN MKTP US 2G5XH01L0 AMZN COM BIL WA	Debit	- $54.69	$427.60
Sep 13	Digital Card Purchase - AMAZON COM 2G77X7P00 AMZN COM BIL WA	Debit	- $25.59	$402.01
Sep 13	Debit Card Purchase - AMZ TWITCH PAY AMAZON C WA	Debit	- $5.40	$396.61
Sep 14	Digital Card Purchase - AMZN MKTP US 2G91X3MZ1 AMZN COM BIL WA	Debit	- $26.52	$370.09
Sep 14	Digital Card Purchase - AMAZON COM 2G2N11XU0 AMZN COM BIL WA	Debit	- $158.87	$211.22

John King | STATEMENT PERIOD Sep 1 - Sep 30, 2021

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 14	Digital Card Purchase - AMZN MKTP US 2G5K005O1 AMZN COM BIL WA	Debit	- $29.31	$181.91
Sep 16	Deposit from 3428 FUTURE TECH DIRDEP	Credit	+ $2,950.86	$3,132.77
Sep 19	Digital Card Purchase - BEENVERIFIED INC 8559046471 NY	Debit	- $28.61	$3,104.16
Sep 19	Debit Card Purchase - SQ FACELOOK BARBER SH SOUTH PLAINF NJ	Debit	- $30.00	$3,074.16
Sep 19	Debit Card Purchase - TMOBILE AUTO PAY 800 937 8997 WA	Debit	- $240.92	$2,833.24
Sep 20	Debit Card Purchase - APPLEBEES 995364700479 KEARNY NJ	Debit	- $37.95	$2,795.29
Sep 20	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $6.63	$2,788.66
Sep 20	Digital Card Purchase - NETFLIX COM LOS GATOS CA	Debit	- $19.47	$2,769.19
Sep 21	Debit Card Purchase - QUICK CHEK CORP PISCATAWAY, NJ US	Debit	- $4.78	$2,764.41
Sep 21	Debit Card Purchase - THE VANGUARD HARRISON NJ	Debit	- $92.77	$2,671.64
Sep 21	Debit Card Purchase - LAGOS SPOT NEWARK NJ	Debit	- $22.39	$2,649.25
Sep 22	Debit Card Purchase - BURLINGTON STORES 328 S PLAINFIELD, NJ U	Debit	- $69.94	$2,579.31
Sep 22	Debit Card Purchase - QUICK CHEK CORP PISCATAWAY, NJ US	Debit	- $1.06	$2,578.25
Sep 23	Debit Card Purchase - CASH APP [redacted] 4153753176 CA	Debit	- $100.00	$2,478.25
Sep 23	Debit Card Purchase - SQ ARRIVAL FITNESS NEWARK NJ	Debit	- $4.00	$2,474.25
Sep 23	Debit Card Purchase - D AND G TIRES INC NEWARK NJ	Debit	- $55.45	$2,418.80
Sep 24	Debit Card Purchase - CHICK FIL A 03993 SOUTH PLAINF NJ	Debit	- $8.16	$2,410.64
Sep 24	Debit Card Purchase - AMAZON COM 2G26J37L2 A AMZN COM BIL WA	Debit	- $21.99	$2,388.65
Sep 26	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $5.36	$2,383.29
Sep 26	Debit Card Purchase - NIKEPOS US NEWARK NJ	Debit	- $314.85	$2,068.44
Sep 26	Debit Card Purchase - AMAZON COM 2C2IH8ZE0 A AMZN COM BIL WA	Debit	- $12.54	$2,055.90
Sep 27	Withdrawal from DISCOVER E-PAYMENT	Debit	- $1,500.00	$555.90

capitalone.com 1-888-464-0727 P.O. Box 60, St. Cloud, MN 56302 MEMBER FDIC

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 27	Debit Card Purchase - MCDONALD S F6978 NEWARK NJ	Debit	- $8.31	$547.59
Sep 27	Debit Card Purchase - MCDONALD S F6978 NEWARK NJ	Debit	- $12.88	$534.71
Sep 27	Debit Card Purchase - EDIBLE ARRANGEMENTS 22 NEWARK NJ	Debit	- $31.98	$502.73
Sep 27	Debit Card Purchase - AMZ EDIBLE BRANDS PAY AMAZON C WA	Debit	- $125.79	$376.94
Sep 27	360 Checking Card Adjustment Signature (Credit) AMZ EDIBLE BRANDS PAY AMAZON C WA	Credit	+ $10.66	$387.60
Sep 28	Weekending 9-19-21 - Check Deposit (Mobile)	Credit	+ $875.00	$1,262.60
Sep 29	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $5.50	$1,257.10
Sep 29	Debit Card Purchase - APPLE COM BILL 1111111111 CA	Debit	- $10.81	$1,246.29
Sep 30	Deposit from 3428 FUTURE TECH DIRDEP	Credit	+ $3,056.90	$4,303.19
Sep 30	Debit Card Purchase - QUICK CHEK FOOD STR SOUTH PLAINF NJ	Debit	- $66.00	$4,237.19
Sep 30	Debit Card Purchase - ARRIVAL CR ARRIVAL CR NEWARK NJ	Debit	- $11.13	$4,226.06
Sep 30	Debit Card Purchase - AUDIBLE 2C3ZA9D31 AMZN COM BIL NJ	Debit	- $16.18	$4,209.88
Sep 30	Monthly Interest Paid	Credit	+ $0.17	$4,210.05
Sep 30	**Closing Balance**			**$4,210.05**

Fees Summary

	TOTAL FOR THIS PERIOD	TOTAL YEAR-TO-DATE
Total Overdraft Fees	**$0.00**	**$0.00**
Total Return Item Fees	**$0.00**	**$0.00**

[redacted]

0.00%	$0.00	30
ANNUAL PERCENTAGE YIELD (APY) EARNED	YTD INTEREST AND BONUSES	DAYS IN STATEMENT CYCLE

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 1	**Opening Balance**			**$1.48**
Sep 30	**Closing Balance**			**$1.48**

Fees Summary

	TOTAL FOR THIS PERIOD	TOTAL YEAR-TO-DATE
Total Fees	**$0.00**	**$0.00**

If anything in your statement looks incorrect, please let us know immediately.

In case of error or questions about your electronic transfers, we can be reached by telephone at 1-888-464-0727, or mail at P.O. Box 60, St. Cloud, MN 56302. Or, log in to your account at capitalone.com and click on the transaction. If you think your statement or receipt is wrong or if you need more information about a transfer listed on your statement or receipt, you must let us know within 60 days after we sent you the FIRST statement on which the error appeared.

(1) Tell us your name and account number.

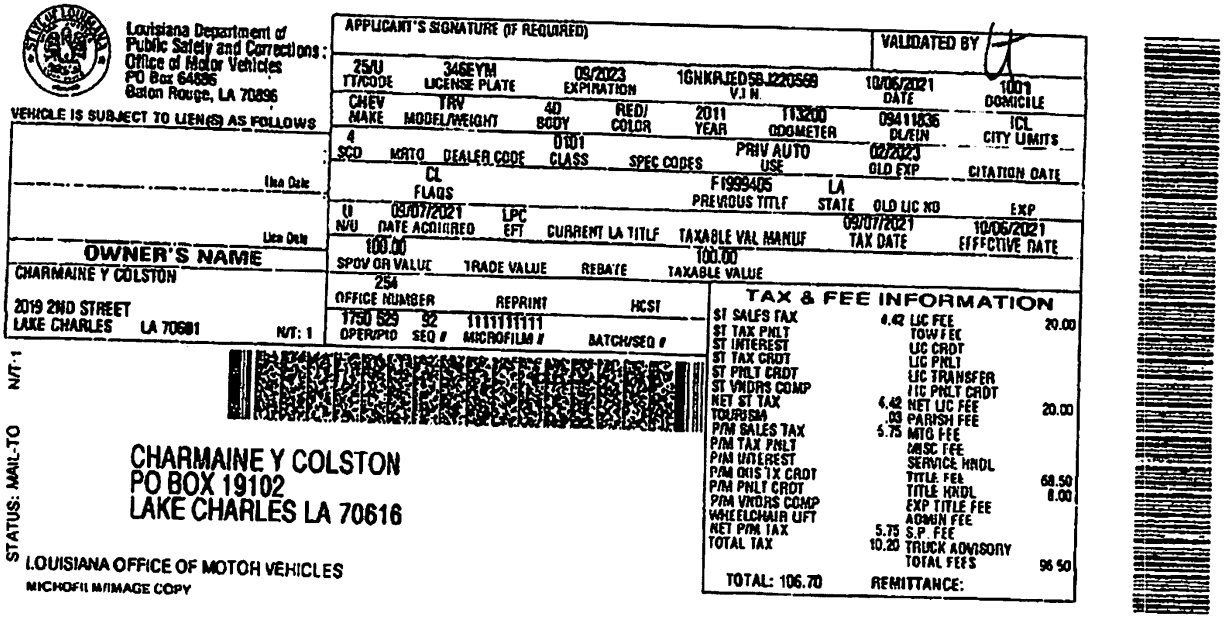
(2) Describe the error or the transfer you are unsure about, and provide an explanation of why you believe it is an error or why you need more information.

(3) Tell us the dollar amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this, we will credit your account for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation.

3. Vehicle Title Information

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division



Louisiana Department of Public Safety and Corrections: Office of Motor Vehicles PO Box 64886 Baton Rouge, LA 70896

VEHICLE IS SUBJECT TO LIEN(S) AS FOLLOWS

Lien Date

Lien Date

OWNER'S NAME
CHARMAINE Y COLSTON
2019 2ND STREET
LAKE CHARLES LA 70601 N/T: 1

APPLICANT'S SIGNATURE (IF REQUIRED)

VALIDATED BY

25/U TT/CODE	346EYM LICENSE PLATE	09/2023 EXPIRATION	1GNKRJED5BJ220569 V.I.N.			10/06/2021 DATE	1001 DOMICILE
CHEV MAKE	TRV MODEL/WEIGHT	40 BODY	RED/ COLOR	2011 YEAR	113200 ODOMETER	09411835 DL/EIN	ICL CITY LIMITS
4 SCD	MRTO	DEALER CODE	0001 CLASS	SPEC CODES	PRIV AUTO USE	02/2023 OLD EXP	CITATION DATE
	CL FLAGS			F1999405 PREVIOUS TITLE	LA STATE	OLD LIC NO	EXP
U N/U	09/07/2021 DATE ACQUIRED	LPC EFT	CURRENT LA TITLE	TAXABLE VAL MANUF		09/07/2021 TAX DATE	10/06/2021 EFFECTIVE DATE
100.00 SPCV OR VALUE		TRADE VALUE	REBATE	100.00 TAXABLE VALUE			
254 OFFICE NUMBER		REPRINT		HCST			
1750 529 OPER/PID	92 SEQ #	1111111111 MICROFILM #		BATCH/SEQ #			

N/T: 1

STATUS: MAIL-TO

CHARMAINE Y COLSTON
PO BOX 19102
LAKE CHARLES LA 70616

LOUISIANA OFFICE OF MOTOR VEHICLES
MICROFILM/IMAGE COPY

TAX & FEE INFORMATION

ST SALES TAX	4.42	LIC FEE	20.00
ST TAX PNLT		TOW FEE	
ST INTEREST		LIC CRDT	
ST TAX CRDT		LIC PNLT	
ST PNLT CRDT		LIC TRANSFER	
ST VNDRS COMP		LIC PNLT CRDT	
NET ST TAX	4.42	NET LIC FEE	20.00
TOURISM	.03	PARISH FEE	
P/M SALES TAX	5.75	MTC FEE	
P/M TAX PNLT		MISC FEE	
P/M INTEREST		SERVICE HNDL	
P/M DIS TX CRDT		TITLE FEE	68.50
P/M PNLT CRDT		TITLE HNDL	8.00
P/M VNDRS COMP		EXP TITLE FEE	
WHEELCHAIR LIFT		ADMIN FEE	
NET P/M TAX	5.75	S.P. FEE	
TOTAL TAX	10.20	TRUCK ADVISORY	
		TOTAL FEES	96.50
TOTAL: 106.70		REMITTANCE:	

25 10101

TO AVOID REJECTION:
Complete all required information

Louisiana Department of Public Safety and Corrections
Office of Motor Vehicles
P.O. Box 64886, Baton Rouge, LA 70896-4886

VEHICLE APPLICATION

P01
LPC

Date Prepared: 10-6-21 | Type of Plate: auto | ELECTRONIC FUND TRANSFER CODE | DEALER CODE

VIN: 1GNKRJED5BJ220559 | Make: CHEV | License No | Exp Date

Body: 4D | Color: Red | Year: 2011 | Mileage: 113200 | Model/Weight

Name of Owner: Charmaine Y Colston | Driver's License or EIN: [redacted]

Name of Joint Owner (if applicable) | Driver's License or EIN

[redacted]

Are you residing within the corporate limits of municipality? ☑ YES ☐ NO

Are you residing within a special tax district or ward? ☐ YES ☑ NO If yes, what ward or district?

Name: Charmaine Y Colston | ☐ Owner ☐ Lessee, renter, or domicile address | Domicile Code: 1001

Street: [redacted] | Driver's License or EIN of Lessee or Renter

City: | Trade VIN

Trade License No

VEHICLE IS SUBJECT TO SECURITY AGREEMENT AS FOLLOWS:

ELECTRONIC LIEN TRANSFER CODE

First Lienholder's Name | Second Lienholder's Name

Street | Street

City/State/Zip | City/State/Zip

☐ New ☑ Used | Date Acquired: 9-7-21 | Tax Date: 9-7-21 | Previous Title No: P9999405 | State: LA | Cost of Vehicle: 100 | Trade: —

Title Fee	Lic Plate Credit	Handling Fee	Rebate	—	Tax Value: 100
Mortgage Fee	Tax	Tax Fee			
License Fee	*Tax Penalty	Miscellaneous Fee			
Lic Transfer Fee	*Interest	Total Fees			
License Credit	Vendor's Comp	Total Taxes			
License Penalty	Tax Credit	Grand Total			

BE SURE TO SIGN AND DATE

I do swear or affirm that the information contained in this document is true and correct to the best of my knowledge

I have and will maintain, during this registration period, vehicle liability insurance (security) required by LRS Title 32 861-865. Failure to maintain as agreed will be a violation of law which may result in criminal prosecution and/or suspension of registration privileges.

If the vehicle being registered is defined as a commercial motor vehicle by the Federal Motor Carrier Safety Regulations and/or Federal Hazardous Material Regulations, by signature below registrant declares knowledge of those federal regulations.

Charmaine Colston — Applicant's Signature | 10-06-21 — Date

Co-Applicant's Signature | Date

PROOF OF LIABILITY INSURANCE MUST BE FURNISHED AS PROVIDED FOR BY LAW BEFORE THIS FILE CAN BE PROCESSED.

TO AVOID PENALTY AND INTEREST:

File must be submitted within 40 days from the date of purchase. For manufactured houses (mobile homes), file must be submitted by the 20th of the month following the month of delivery.

*Tax Penalty: 5% of sales tax due for 30 days or fraction thereof (not to exceed 25%).

*Interest 1.25% of sales tax due for 30 days or fraction thereof (no maximum).

DUPLICATE TITLE AFFIDAVIT (Must be signed by owner and notarized)

The certificate of title issued to me was ☐ lost ☐ mutilated ☐ never received

I make application for a duplicate copy of said certificate and agree to hold the Commissioner harmless if the previous title is obtained by another person.

☐ I give the Commissioner permission to mail the title to the address on this application

Owner(s)'s Signature(s) for Duplicate Title

Witness | Witness

Sworn and subscribed before me this _____ day of _____, _____

Notary Public Signature, Printed Name | ID Number

AFFIDAVIT OF NON-POSSESSION OF TITLE BY LIENHOLDER
Must be signed by lienholder and notarized.

I hereby swear or affirm that title of above described vehicle showing lien in our favor was ☐ never received ☐ received and surrendered to the owner

Lienholder's Signature

Witness | Witness

Sworn and subscribed before me this _____ day of _____, _____

Notary Public Signature, Printed Name | ID Number

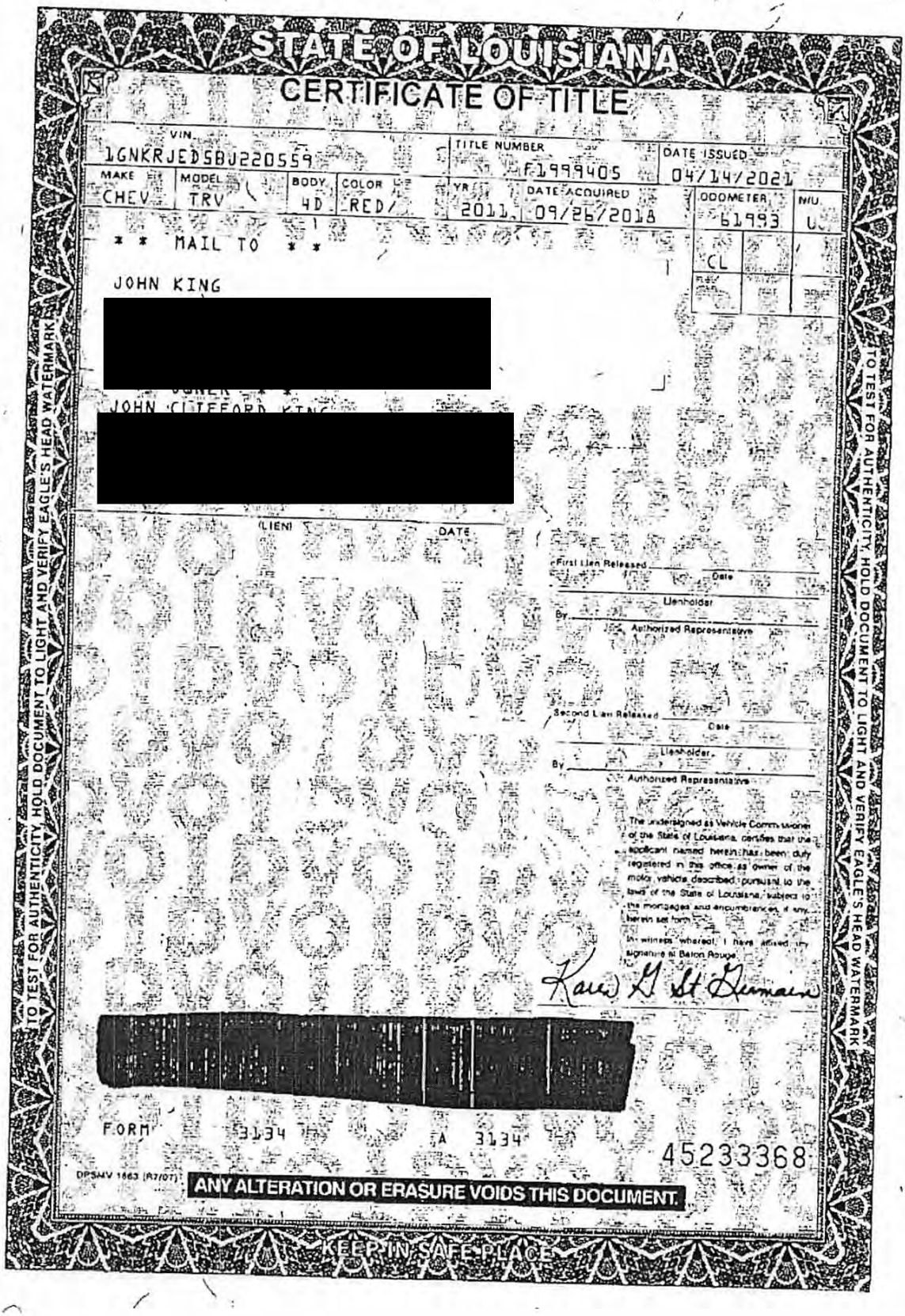
RECEIVED/REJECTION DATE(S)

RECEIVED BY:

OCT 06 2021

PEDERSEN TITLE CO #254

DPSAV 1799 (R01/18)



STATE OF LOUISIANA

CERTIFICATE OF TITLE

TO TEST FOR AUTHENTICITY, HOLD DOCUMENT TO LIGHT AND VERIFY EAGLE'S HEAD WATERMARK

VIN: 1GNKRJED5BJ220559

TITLE NUMBER: F1999405

DATE ISSUED: 04/14/2021

MAKE	MODEL	BODY	COLOR	YR	DATE ACQUIRED	ODOMETER	MIL
CHEV	TRV	4D	RED/	2011	09/26/2018	61993	

* * MAIL TO * *

JOHN KING

[redacted]

JOHN CLIFFORD KING

[redacted]

(LIEN) DATE

First Lien Released Date

Lienholder

By Authorized Representative

Second Lien Released Date

Lienholder

By Authorized Representative

The undersigned as Vehicle Commissioner of the State of Louisiana, certifies that the applicant named herein has been duly registered in this office as owner of the motor vehicle described, pursuant to the laws of the State of Louisiana, subject to the mortgages and encumbrances, if any, herein set forth.

In witness whereof, I have affixed my signature at Baton Rouge.

Karen G St Germain

[redacted]

FORM 3134 A 3134

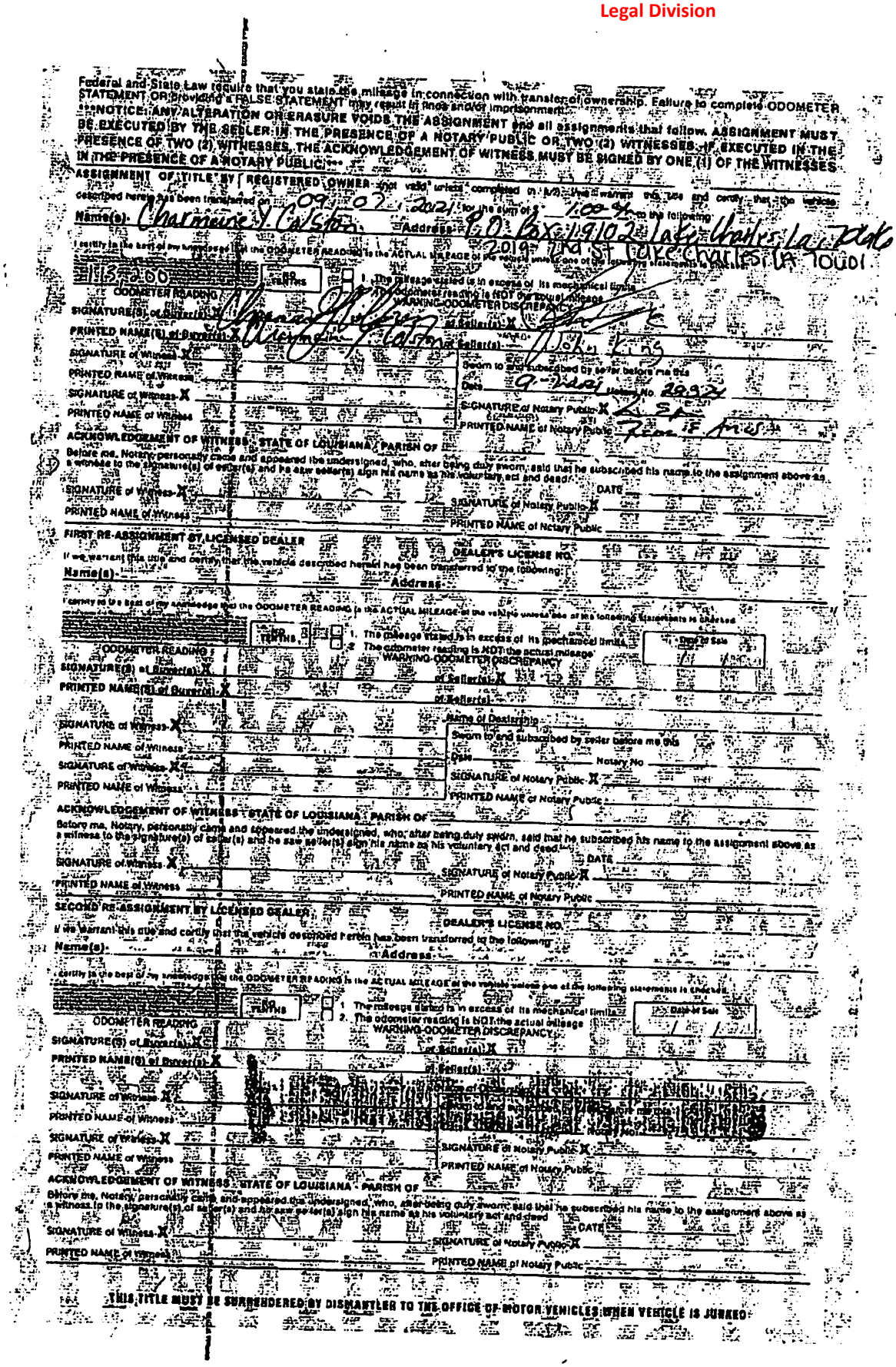
45233368

DPSMV 1663 (R7/07)

ANY ALTERATION OR ERASURE VOIDS THIS DOCUMENT.

KEEP IN SAFE PLACE

TO TEST FOR AUTHENTICITY, HOLD DOCUMENT TO LIGHT AND VERIFY EAGLE'S HEAD WATERMARK



Federal and State Law require that you state the mileage in connection with transfer of ownership. Failure to complete ODOMETER STATEMENT OR providing a FALSE STATEMENT may result in fines and/or imprisonment.

NOTICE: ANY ALTERATION OR ERASURE VOIDS THE ASSIGNMENT and all assignments that follow. ASSIGNMENT MUST BE EXECUTED BY THE SELLER: IN THE PRESENCE OF A NOTARY PUBLIC OR TWO (2) WITNESSES. IF EXECUTED IN THE PRESENCE OF TWO (2) WITNESSES, THE ACKNOWLEDGEMENT OF WITNESS MUST BE SIGNED BY ONE (1) OF THE WITNESSES IN THE PRESENCE OF A NOTARY PUBLIC.

ASSIGNMENT OF TITLE BY REGISTERED OWNER not valid unless completed in full. I/We warrant this title and certify that the vehicle described herein has been transferred on 09-02-2021 for the sum of 1.00 to the following:

Name(s): Charmaine Y. Calston Address: P.O. Box 19102 Lake Charles, LA 70616
2019 3rd St Lake Charles LA 70601

I certify to the best of my knowledge that the ODOMETER READING is the ACTUAL MILEAGE of the vehicle unless one of the following statements is checked.

115200 TENTHS
1. The mileage stated is in excess of its mechanical limits.
2. The odometer reading is NOT the actual mileage. WARNING-ODOMETER DISCREPANCY.
Date of Sale

ODOMETER READING

SIGNATURE(S) of Buyer(s) X
PRINTED NAME(S) of Buyer(s) X
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Witness X
PRINTED NAME of Witness

of Seller(s) X
of Seller(s)
Name of Dealership
Sworn to and subscribed by seller before me this
Date 9-2021 Notary No 29924
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA / PARISH OF
Before me, Notary, personally came and appeared the undersigned, who, after being duly sworn, said that he subscribed his name to the assignment above as a witness to the signature(s) of seller(s) and he saw seller(s) sign his name as his voluntary act and deed.

DATE
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

FIRST RE-ASSIGNMENT BY LICENSED DEALER

If we warrant this title and certify that the vehicle described herein has been transferred to the following:

DEALER'S LICENSE NO.
Name(s):
Address:

I certify to the best of my knowledge that the ODOMETER READING is the ACTUAL MILEAGE of the vehicle unless one of the following statements is checked.

TENTHS
1. The mileage stated is in excess of its mechanical limits.
2. The odometer reading is NOT the actual mileage. WARNING-ODOMETER DISCREPANCY.
Date of Sale

ODOMETER READING

SIGNATURE(S) of Buyer(s) X
PRINTED NAME(S) of Buyer(s) X
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Witness X
PRINTED NAME of Witness

of Seller(s) X
of Seller(s)
Name of Dealership
Sworn to and subscribed by seller before me this
Date Notary No
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA / PARISH OF
Before me, Notary, personally came and appeared the undersigned, who, after being duly sworn, said that he subscribed his name to the assignment above as a witness to the signature(s) of seller(s) and he saw seller(s) sign his name as his voluntary act and deed.

DATE
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

SECOND RE-ASSIGNMENT BY LICENSED DEALER

If we warrant this title and certify that the vehicle described herein has been transferred to the following:

DEALER'S LICENSE NO.
Name(s):
Address:

I certify to the best of my knowledge that the ODOMETER READING is the ACTUAL MILEAGE of the vehicle unless one of the following statements is checked.

TENTHS
1. The mileage stated is in excess of its mechanical limits.
2. The odometer reading is NOT the actual mileage. WARNING-ODOMETER DISCREPANCY.
Date of Sale

ODOMETER READING

SIGNATURE(S) of Buyer(s) X
PRINTED NAME(S) of Buyer(s) X
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Witness X
PRINTED NAME of Witness

of Seller(s) X
of Seller(s)
Name of Dealership
Sworn to and subscribed by seller before me this
Date Notary No
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA / PARISH OF
Before me, Notary, personally came and appeared the undersigned, who, after being duly sworn, said that he subscribed his name to the assignment above as a witness to the signature(s) of seller(s) and he saw seller(s) sign his name as his voluntary act and deed.

DATE
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

THIS TITLE MUST BE SURRENDERED BY DISMANTLER TO THE OFFICE OF MOTOR VEHICLES WHEN VEHICLE IS JUNKED.



2019 2nd St
LC 70601

2021-00123665 Supplemental

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Supplemental Report
Complaint # 2021-00123665
Investigating Detective: Kent Castille

Suspect: Charmaine Colston (B/F)
Charge: LA R.S. 14:72 Forgery
14:67.26.C.2 Theft of Motor Vehicle from $5,000 but less than $25,000

Victim: John King (B/M)

Attachments:
3. Vehicle Title Information
4. King's Bank Statements
5. Southwest Louisiana Credit Union Documents
6. King's Work Documents

Evidence / Veripic Available Upon Request:
Audio Statement of John King

On October 12, 2021, I, Detective Kent Castille, was assigned a Forgery case for follow up investigation.

On October 18, 2021, I spoke with victim, John King, over the phone and obtained an audio statement in reference to a Forgery. King stated he learned his vehicle, 2011 red Chevrolet Traverse VIN 1GNKRJED5BJ22055 bearing the Louisiana License Plate 346EYM, was fraudulently forged into the subject's name, Charmaine Colston. King claimed he and Colston were in a romantic relationship that has since been terminated and during their relationship, King purchased the stated vehicle and listed it under his name only. King stated he and Colston were never married, had children together, and suffered a traumatic breakup. King allowed Colston to utilize his vehicle during and after the course of their relationship. King moved to New Jersey and left the stated vehicle at his mother's residence of 123 Louisiana Avenue and continued to allow Colston to utilize the vehicle. King stated he left one copy of the vehicle keys with his mother and one with Colston. King claimed he made most of the payments on the vehicle but Colston had assisted, unknown how much was contributed by either party. King claimed Colston obtained a copy of the title by placing her address as a secondary address for the title to be mailed to, the address being P.O. Box 19102 Lake Charles, LA. King stated he never authorized any secondary address for the vehicle title and the only address listed should have been 123 Louisiana Avenue. King stated he only allowed Colston to utilize the stated vehicle but never consented to her possessing ownership of it. King claimed he believed Colston obtained the vehicle title through Southwest Louisiana Credit Union (SWLACU) who he utilized to obtain a loan to purchase the vehicle. King stated he purchased the vehicle for an estimated $15,000.00.

On October 19, 2021, I traveled to Thib's Auto Titles and Tags, Inc (located on 3620 Gerstner Memorial Blvd) and requested a copy of the current title of the stated vehicle. Thib's employees were able to inform me the title was processed at Pedersen Title Co (located on 0411, 1700 E Prien Lake Rd #8) during the early part of October. I traveled to Pedersen and obtained a copy of the current title of the vehicle and noticed it was notarized on September 7, 2021, by Renee E Amos (ID 29374.) On the stated title was King's signature on the seller line. Pedersen employees were able to inform me Colston processed the title at the business on October 6, 2021. I was not able to review video footage of the transaction until October 25, 2021, due to the manager not being present. Once I reviewed the video surveillance, I observed a black female wearing a black V neck shirt, blue jeans, and sunglasses on October 6, 2021, at the hour of 1149AM. I was able to identify the female in the video footage as Colston. Due to a technical error with Pedersen's security system, I was unable to obtain a copy of the incident.

On October 26, 2021, I spoke with Amos over the phone and she stated all of her notary transactions require all parties to be present with their credentials. Amos claimed she had no memory of the specific transaction between King and Colston and stated she does not maintain any records as she is not required to by law. Amos specified numerous times during our conversation that she requires all parties to be physically present with their credentials. Amos claimed she had only conducted a few transactions through an online webcam and was confident the stated transaction was not done that way.

On October 26, 2021, I received a detailed copy of the vehicle's title from the email address of Franzel.Doucet@la.gov. I observed a Vehicle Application form that was processed by Colston and the current title of the stated vehicle. The title of the vehicle listed only King's name along with the two addresses of P.O. Box 19102 and 123 Louisiana Drive on the front. Attached was also a photo copy of Colston's Louisiana Driver's License that she produce to finalize the transaction. Attached was the current vehicle registration which showed the vehicle was sold and purchased for the price of $100.00 (listed on registration as "SPOV or Value.") The registration also listed Colston as the vehicle owner with the address of P.O. Box 19102.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

I attempted to contact Colston by phone (337-438-9036 and 337-499-6021) but both phone numbers were disconnected. On October 26, 2021, I traveled to 1225 Country Club Rd, #5107, to attempt to speak with Colston. I received no answer at the door and left a card requesting a call back. On October 28, 2021, I received a call from Wilford Carter Law, LLC stating Carter will be representing Colston in regards to a case involving a Forgery. I began also receiving numerous calls from a Private phone number with my work office phone. I was not present at my desk to answer the stated phone calls and no voicemails were left. On October 29, 2021, I was able to answer a phone call from the Private number. As I answered the phone call, Colston identified herself and without being prompted in any way, Colston stated King provided consent for her to obtain ownership of his vehicle. I asked Colston if she would be willing to provide me a statement in person and she began discussing how King gave her permission to write his signature on the vehicle title. I was unable to record the conversation and I only vocalized the possibility of Colston providing me with a statement. Colston provided me with her most recent phone number, 337-526-1992, and continued to defend herself stating she was authorized by King to take ownership of his vehicle.

On October 28, 2021, I traveled to SWLACU and met with employees. I was informed the vehicle was purchased only under King's name and that Colston had filed a "Member to Member Authorization Form." I was informed this form was filed to allow Colston to make payments to King's account. Upon obtaining a copy of the stated form, I observed Colston listed the relationship to King as "Husband" with the two never being married. The form was processed on March 14, 2017, and had the member ID of Colston (1000059007) and King (1000058944) listed. Employees were able to inform me that they were contacted by King, who accused them of mistakenly giving Colston the title to his vehicle. I was informed the vehicle title was mailed to Colston due to the P.O. Box 19102 address having been placed on the title when the vehicle registration last renewed through the state. King confirmed he was not the one who renewed the vehicle registration and believed it was done by Colston. SWLACU had no part in mailing the vehicle title or dictating who would receive the stated title.

On November 2, 2021, I received, by email, from King, two documents that he completed with his job during the day of September 7, 2021, in New Jersey. The documentation stated King was in New Jersey conducting his professional duties at the location of 1640 New Market Ave, S. Plainfield, NJ 07080. The documentation stated King was occupied at the stated location from 12:00PM to 08:30PM. King also submitted his bank statements during the month of September to prove that he was not in or capable of being present in Louisiana when the vehicle title was transferred to Colston and notarized.

On November 2, 2021, I received a call from Carter who stated Colston will not provide a statement to me. Carter claimed the only information that Colston can provide is that she was authorized by King to transfer the vehicle title to her name.

This case is being forwarded to the District Attorney's Office for review.

All documents, audio, video and photos (if any) have been imported into the Aegis case, CPSO Portal and Veripic System. I observed numerous forms of documentation stating Colston to be the new registered owner of the stated vehicle with a photo copy of her Driver's License which she produced to finalize the process.

No further information at this time.
End of Report
Detective: Kent Castille
[redacted]

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Case Report

Summary

Print Date/Time: 08/25/2022 11:25
Login ID: cpsoapps\mhamolka
Case Number: 2021-00147277

Calcasieu Parish Sheriff's Office
ORI Number: LA0100000

Case

Case Number: 2021-00147277
Location: 123 LOUISIANA AVE
LAKE CHARLES, LA 70601
Reporting Officer ID: 12808 - Phillips

Incident Type: Forgery/Fraud
Occurred From: 12/09/2021 13:15
Occurred Thru: 12/09/2021 13:15
Disposition:
Disposition Date:
Reported Date: 12/09/2021 13:15 Thursday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	13B	14:38	Simple Assault	1
2	State	250	14:72	Forgery	1
3	State	250	14:133	Filing or Maintaining False Public Records	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect	1	Colston, Charmaine Yvette	[redacted]		Black	Female	[redacted] 32
Suspect	2	King, John Clifford			Black	Male	[redacted] 35
Victim	1	Society					
Victim	2	King, John Clifford			Black	Male	[redacted] 35

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.

Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License Plate	State

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

OFFENSE REPORT CHECKLIST

The following are tasks that should be completed prior to a report being submitted to the prosecutor.

JBL The investigation is either complete or in a state where a report needs to be submitted.

JBL The report indicates that, if applicable, the victim or victim's family has been contacted and informed of the status of the investigation.

JBL The report indicates that, all items of evidence collected have been properly submitted to evidence, records or photographic services and either scanned into the CPSO computer system by the assigned investigative assistant or investigator.

JBL The report contains an exhaustive list of items collected, whether stored in records or evidence, and the list of items collected has been placed on the CPSO Offense Report Receipt to make it easy for the prosecutor to see what information he/she should have access to for immediate consideration.

JBL The report has been preserved in the appropriate CPSO computer program and all available evidentiary attachments have been scanned into the CPSO computer system.

JBL A copy of all evidentiary items that can be replicated, digitally or otherwise, is attached to the report. This may not be necessary in certain limited circumstances.

N/A If the investigation is ongoing, that fact has been referenced in the original report to put the prosecutor on notice that more information may be available at a later date.

N/A If applicable, any in car video needed as evidence has been properly tagged and Photographic Services has been notified to transfer said video to the D.A.'s Server.

This report, complaint # 2021-00147277 , and the associated evidentiary attachments are ready to be submitted to the District Attorney's Office for review.

James Leubner
Supervisor's Signature

6/9/2022
Date

James Leubner
Supervisor's printed name

Financial Crimes
Division

NOTES: ____

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office
TONY MANCUSO, SHERIFF AND EX-OFFICIO TAX COLLECTOR
Parish of Calcasieu • 5400 E. Broad Street • Lake Charles, LA 70615
Phone (337) 491-3700 • Fax (337) 494-4522

CPSO OFFENSE REPORT RECEIPT

Complaint # 2021-00147277 Investigating Deputy Kent Castille

List of evidentiary items attached to the report for consideration by D.A.'s Office:

1. Initial Report
2. J. Bruns Supplemental Report
3. K. Castille Supplemental Report
4. King Life Insurance
5. State Farm – King Email
6. King Email Statement
7. State Farm Subpoena
8. Colston Email Statement
9. Ambrose Statement
10. Harris Statement
11. Colston Documents

RECEIVED
JUN 13 2022
DA / INTAKE

Date Time

Signature of D.A. Representative receiving report

If there is a question or a need for immediate assistance associated with this report; the investigating officer may be contacted by email. Please always copy the listed supervisor.

Investigating Deputy Kent Castille

CPSO Supervisor James Leubner

DA Review 21-147277 (Charmaine Colston)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

STEPHEN C. DWIGHT
District Attorney
FOURTEENTH JUDICIAL DISTRICT
CALCASIEU PARISH

JACOB L. JOHNSON
First Assistant
DISTRICT ATTORNEY

P.O. Box 3206
Lake Charles, LA 70602
Phone: 337-437-3400
Fax: 337-437-3325

July 15. 2022

Calcasieu Parish Sheriff's Office
Kent Castille, 10450
Report #: 21-147277

Defendant: Charmaine Yvette Colston B/F DOB: [redacted]

Action/Status	Statute	Charge	Offense Date	Warrant
RF Insufficient Evidence	14:72.A	Forgery	12/09/2021	

NOTES/COMMENTS/OTHER REQUIREMENTS:

REVIEWED BY: **Joseph Williams**

The information requested MUST be forwarded to this office within THIRTY (30) DAYS of the date of this advisement. When forwarding a follow-up and/ or warrant, please attach a copy of this advisement.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

STEPHEN C. DWIGHT
District Attorney
FOURTEENTH JUDICIAL DISTRICT
CALCASIEU PARISH

JACOB L. JOHNSON
First Assistant
DISTRICT ATTORNEY

P.O. Box 3206
Lake Charles, LA 70602
Phone: 337-437-3400
Fax: 337-437-3325

July 15. 2022

Calcasieu Parish Sheriff's Office
Kent Castille, 10450
Report #: 21-147277

Defendant: John Clifford Joseph King B/M DOB: [redacted]

Action/Status	Statute	Charge	Offense Date	Warrant
RF Insufficient Evidence	14:133	Filing or Maintaining False Public Records	12/09/2021	

NOTES/COMMENTS/OTHER REQUIREMENTS:

REVIEWED BY: **Joseph Williams**

The information requested MUST be forwarded to this office within THIRTY (30) DAYS of the date of this advisement. When forwarding a follow-up and/ or warrant, please attach a copy of this advisement.

OfficerID: CPSOAPPS\ephillips, Supplemental Narrative

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

On December 9, 2021, at approximately 1315 hours, I, Sgt. Elliott Phillips was working the front Administration Desk, when a forgery complaint was being reported.

Sgt. Phillips, spoke with the complainant, John King, who stated his ex-girlfriend has been threatening him. King, stated his ex-girlfriend, Charmaine Colston has opened a $600,000 life insurance policy in his name. King stated the policy was opened at State Farm and was opened sometime in 2020. King, also stated Colston had transferred a $50,000 policy to her account from his, but State Farm has since corrected that account. King, stated he never signed any policy with State Farm as Colston the beneficiary, and that she forged his signature. King stated he and Colston were together for several years, also had two kids together. King advised Colston has been sending him threatening emails and text messages, stating he was going to kill him. King was very upset by this incident since Colston opened up the life insurance policy and she has been saying she was going to kill him.

King had a prepared statement ready for Detectives, that he would email to the Detective that contacts him. King also had several messages and the policy information that Colston opened up. King was advised a report would be done on the incident and Detectives would be in contact with him.

NOTE: King stated he works out of town a lot, but Detectives could contact him on his cell phone. King also provided his email, johncjking86@gmail.com

EOR/NFI
Sgt. Elliott Phillips 12808

2021-00147277 Supplemental Report

Supplemental Report
Complaint # 2021-00147277
Associated Case # 2021-00123665
Investigating Detective: Sgt. Joshua Bruns

Suspect 1: Charmaine Colston (B/F)
Charge: LA R.S. 14:38 Simple Assault
LA R.S. 14:72 Forgery

Victim 1: John King (W/F)

Attachments: N/A

Evidence Available Upon Request:
Audio Interview with John King

On December 10, 2021, I, Detective Sgt. Joshua Bruns was assigned a Forgery case for follow up investigation.

On January 3, 2022, I conducted an audio recorded interview with the victim, John King. He advised that in May or June of 2021, he discovered that the subject, Charmaine Colston, had a life insurance policy taken out on him. He stated that Colston used to be his girlfriend but that they are no longer in a relationship. Colston stated that she has threatened to kill him previously. He said these threats occurred as far back as 2004. King advised that the policy was held at State Farm and Don Harris was the agent. King advised that he was aware that they were looking at policies when they were dating. He also advised that he submitted to a blood test for the policy, but he stated he didn't sign the document.

On January 24, 2022, I went to Don Harris' office located at 1614 Hwy 14 in Lake Charles. I spoke with Tony Guillory about this investigation. He advised that the policy had been opened since 2018. He also stated that King would have needed to be present for the policy to have even been enacted. He stated that the total policy amount was for $25,000.00.

On February 7, 2022 at 0917 hours, I attempted to contact Colston regarding this investigation and the phone number is not accepting calls at this time.

On February 7, 2022 at 0919 hours, I spoke with Guillory again at Don Harris State Farm. Guillory advised that he would need Colston's authorization to give a recorded statement regarding the policy.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185 Lake Charles LA 70602
Legal Division

While working this investigation I learned that King had also filed other reports in which he stated that Colston had forged his information. I located CPSO Case # 2021-00123665 which was worked by Detective Kent Castille. In that case report Det. Castille was advised that Colston was being represented by Wilfred Carter. I contacted Carter's office to try and obtain a statement from Colston. I was advised that Colston is not represented by them at this time.

On February 14, 2022, I am submitting this case to the District Attorney's office. A secondary supplemental will be submitted if contact with Colston is made.

All documents, audio, video and photos (if any) have been imported into the Aegis case, CPSO Portal and Veripic System.

No further information at this time.
End of Report
Detective: Sgt. Joshua Bruns (10120)
[redacted]

2021-00147277 2nd Supplemental

2nd Supplemental Report
Complaint # 2021-00147277
Investigating Detective: Kent Castille

Suspect: Charmaine Colston (B/F)
Charge: LA R.S. 14:72 Forgery
14:38 Simple Assault (Unfounded)

John King (B/M)
LA R.S. 14:133 Filing or Maintaining False Public Records

Victim: John King (B/M)
Society

Attachments:
3. King Life Insurance
4. State Farm – King Email
5. King Email Statement
6. State Farm Subpoena
7. Colston Email Statement
8. Ambrose Statement
9. Harris Statement
10. Colston Documents

Evidence / Veripic Available Upon Request:
State Farm Documents

On March 10, 2022, I, Detective Kent Castille, was reassigned a Forgery case for follow up investigation.

I am the lead detective of CPSO Case 2021-00123665, which involved both John King and Charmaine Colston. During the investigation, King provided documentation of Colston and he communicating after the claim of Colston making threats on his life. In CPSO Case 2021-00147277, King stated he did not feel safe communicating with Colston but admitted to openly communicating with Colston in CPSO Case 2021-00123665.

On March 21, 2022, Detective James Leubner and I met with Assistant District Attorney Ross Murray at the Calcasieu Parish District Attorney's Office. The matter of creating a life insurance policy for a separate individual, weather with or without that separate individual's consent, was established to not be a criminal matter.

On March 22, 2022, I attempted to contact King by the phone number of 337-488-5663 but the phone number appeared to no longer be operational. I attempted to call King at the phone number of 318-433-0964 but my call was not answer and I could not leave a

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

voicemail. I later received a call from King and his attorney (believed to be Aminah Massenburg.) During the conversation, Massenburg and King were adamant that Colston forged King's signature to create insurance policies and fraudulently obtained ownership of other insurance policies from King. I was not able to obtain a clear timeline of events that King and Massenburg were attempting to describe and I asked King to email me statement detailing all issues. On April 20, 2022, I obtained King's statement from his email account of johncjking86@gmail.com. Within King's statement, he stated "Jennifer Ambrose processed to illegally and without cause illegally transfer the existing policy from 2018 that I owned and rerolled the cash value into TWO entire new policies owned completely by my ex girlfriend Charmaine Y Colston." King stated Ambrose and Colston were the individuals responsible for the fraudulent activity that he claimed on his insurance policies.

On March 25, 2022, I traveled to State Farm Insurance (1614 Highway 14) and spoke with Jennifer Ambrose in reference to King's insurance policies. Ambrose stated King was lying about his signature being forged on the documents and that she remembers him signing them. Ambrose stated she was the State Farm employee who processed the policies created by King and Colston. Ambrose stated King authorized the creation of policies under Colston's account, making Colston the owner of the policies. Ambrose provided me with a copy of an email conversation between King and Don Harris (who at the time was the manager of the State Farm location.) Along with the stated email conversation was a signed letter from King to Harris. King stated nothing about the policies being specifically fraudulent but mentioned that he was not wanting Colston to have a life insurance policy on himself. King stated that Colston was not his spouse but yet still "has an active spousal policy on me".

While I spoke to Ambrose, she contacted Harris and the three of us briefly communicated. Ambrose and Harris both stated King created the policies (the same policies he is claiming to be fraudulent) on his own will and that no person forged his signature on anything. I asked Ambrose and Harris if they would each provide me a written statement about the matter. Both individuals agreed and later submitted the written statements to me indicating that King is making a false claim about the insurance policies being fraudulent in any way.

Ambrose informed me that State Farm Insurance had conducted an investigation of the matter and made the conclusion that no fraudulent activity occurred with any of the policies associated with King. I issued a subpoena to State Farm requesting all documents within their investigation. Upon receiving the requested documents, I did not observe any final decision on their investigation. I contacted State Farm corporate office and was informed that no formal investigation was actually conducted. Instead, State Farm employees reviewed the notes provided by Ambrose and Harris and determined that no fraudulent activity occurred.

I contacted Colston by phone and she stated she would submit a typed statement to me through email. On May 4, 2022, I obtained an email from Colston containing a typed statement in reference to this investigation. Within the statement, Colston stated King "has gone to these extreme measures to falsify police reports" in reference to the insurance policies. Within Colston's statement, she stated that the created insurance policies and changes to the insurance policies were made with the consent and authorization of both herself and King.

On June 7, 2022, Colston submitted documentation of a pretrial conference that occurred on May 31, 2022. The document stated "There has been no insurance fraud on behalf of Ms. Colston." The stated documentation had a signature line for "DISTRICT JUDGE" and "Deputy Clerk of Court" on the last page but no signature was present in either line. I reviewed the Clerk of Courts records online and discovered that one May 31, 2022, the following events were documented: "HRNG. OFFC.CONF.FIXED FOR", "TRAIL DATE", "STILPULATIONS", two disbursements, and a minute entry fee. I was not able to locate the documentation provided by Colston through the Clerk of Courts.

This case is being forwarded to the District Attorney's Office to review charges for both King and Colston.

All documents, audio, video and photos (if any) have been imported into the Aegis case, CPSO Portal and Veripic System.

No further information at this time.
End of Report
Detective: Kent Castille
[redacted]

3. King Life Insurance

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division
21-0147277

+++++LF380591952019102505E01707718167409

State Farm Life Insurance Company
PO Box 2364
BLOOMINGTON IL 61702-2364
Telephone (855)534-0227

POLICY NUMBER	Annual Notice of Policy Status	DATE DUE	PLEASE PAY THIS AMOUNT
[redacted]		NOV 16 2019	NONE

E017077
JOHN-CLIFFORD JOSEPH KING, SR
[redacted]

INSURED
JOHN-CLIFFORD JOSEPH KING, SR

ST-0101-0000

POLICY DATE INFORMATION - Your policy is dated November 16, 2018. This notice provides information as of November 16, 2019.

PAYMENT DUE INFORMATION - No amount is due. Payments are made on the State Farm Payment Plan. Your one-month premium is $50.81. Your annualized premium is $609.72.

CASH VALUE INFORMATION - As of November 16, 2019, your policy will have no cash value and no cash surrender value.

INSURANCE INFORMATION	Insurance Amount
20 Pay Life	$25,000.00

Your policy includes Waiver of Premium Disability.

BENEFICIARY INFORMATION - The beneficiary designation is an important part of your policy. Your beneficiary designation is:

Primary: CHARMAINE COLSTON-KING, SPOUSE
Successor: DWADE COLSTON, BROTHER/SISTER

Note: Probate laws may disqualify a policy owner's former spouse from receiving life insurance proceeds. You should update your beneficiary designation if your marital status changes and you want your former spouse to receive the proceeds of this policy.

1307685 03-05-2018 &03182

IMPORTANT POLICYOWNER NOTICE - You should consider requesting more detailed information about your policy to understand how it may perform in the future. You should not consider replacement of your policy or make changes in your coverage without requesting a current illustration. You may annually request, without charge, a current illustration by calling your agent at (337) 439-2747, or by writing or calling State Farm Insurance at the address listed on this notice. If you do not receive a current illustration of your policy within 30 days from your request, you should contact your state insurance department.

All amounts shown are subject to verification. See reverse side for important information.

Thanks for letting us serve you . . .

Agent: DON HARRIS

Telephone: (337) 439-2747

Prepared OCT 25 2019

State Farm Life Insurance Co (Not Licensed in MA, NY, or WI)/ State Farm Life and Accident Assurance Co (Licensed in NY and WI)

IF YOU HAVE MOVED, PLEASE CONTACT STATE FARM

INSURED	JOHN-CLIFFORD JOSEPH KING, SR
POLICY NUMBER	[redacted]

PLEASE RETURN THIS PART WITH YOUR CHECK MADE PAYABLE TO STATE FARM

DATE DUE	PLEASE PAY THIS AMOUNT
NOV 16 2019	NONE

Your cancelled check is your receipt. Any check, draft, or money order received is subject to collection.

State Farm Life Insurance Company
PO Box 2364
BLOOMINGTON IL 61702-2364

For office use only

ANNUAL CONTACT	LIFE		1025

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21 0147277

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State Farm Life Insurance Company
PO Box 2364
BLOOMINGTON IL 61702-2364
Telephone (855)534-0227

POLICY NUMBER		DATE DUE	PLEASE PAY THIS AMOUNT
[redacted]	Annual Notice of Policy Status	NOV 16 2020	NONE

E042659
JOHN-CLIFFORD JOSEPH KING, SR
[redacted]

INSURED
JOHN-CLIFFORD JOSEPH KING, SR

ST-0101-0000

POLICY DATE INFORMATION - Your policy is dated November 16, 2018. This notice provides information as of November 16, 2020.

PAYMENT DUE INFORMATION - No amount is due. Payments are made on the State Farm Payment Plan. Your one-month premium is $50.81. Your annualized premium is $609.72.

DIVIDEND INFORMATION - You elected to have your dividends buy additional paid-up insurance. Your paid-up dividend additions total $172.62. This includes your current dividend of $35.75, which purchased paid-up dividend additions of $172.62.

CASH VALUE INFORMATION - Your cash value is $76.00--an increase of $76.00 from last year. This total includes $35.75, which is the cash value of your paid-up dividend additions.

As of November 16, 2020, the cash surrender value will be $76.00.

INSURANCE INFORMATION	Insurance Amount
20 Pay Life	$25,000.00
Paid-up Dividend Additions	172.62
TOTAL	$25,172.62

Your policy includes Waiver of Premium Disability.

1307885 03-05-2018 A03168

BENEFICIARY INFORMATION - The beneficiary designation is an important part of your policy. Your beneficiary designation is:

Primary: CHARMAINE COLSTON-KING, SPOUSE
Successor: DWADE COLSTON, BROTHER/SISTER

Note: Probate laws may disqualify a policy owner's former spouse from receiving life insurance proceeds. You should update your beneficiary designation if your marital status changes and you want your former spouse to receive the proceeds of this policy.

All amounts shown are subject to verification. See reverse side for important information.

Thanks for letting us serve you . . .

Agent: DON HARRIS

Telephone: (337) 439-2747

Prepared OCT 24 2020

State Farm Life Insurance Co (Not Licensed in MA, NY, or WI)/ State Farm Life and Accident Assurance Co (Licensed in NY and WI)

IF YOU HAVE MOVED, PLEASE CONTACT STATE FARM

INSURED JOHN-CLIFFORD JOSEPH KING, SR

POLICY NUMBER [redacted]

PLEASE RETURN THIS PART WITH YOUR CHECK MADE PAYABLE TO STATE FARM

DATE DUE	PLEASE PAY THIS AMOUNT
NOV 16 2020	NONE

Your cancelled check is your receipt. Any check, draft, or money order received is subject to collection.

State Farm Life Insurance Company
PO Box 2364
BLOOMINGTON IL 61702-2364

For office use only

ANNUAL CONTACT | LIFE | | 1024

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Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division 21 - 0147277

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Information continued for policy LF-3805-9195
Prepared October 24, 2020

IMPORTANT POLICYOWNER NOTICE - You should consider requesting more detailed information about your policy to understand how it may perform in the future. You should not consider replacement of your policy or make changes in your coverage without requesting a current illustration. You may annually request, without charge, a current illustration by calling your agent at (337) 439-2747, or by writing or calling State Farm Insurance at the address listed on this notice. If you do not receive a current illustration of your policy within 30 days from your request, you should contact your state insurance department.

132931.3 12-29-2010 (L05000)

When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information on your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment, and you will not receive your check back from your financial institution.

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Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division 21 - 0147277

STATE FARM LIFE INSURANCE COMPANY

HOME OFFICE, 1 STATE FARM PLAZA, BLOOMINGTON, ILLINOIS 61710

StateFarm

Insured	JOHN-CLIFFORD JOSEPH KING, SR (Male)
Age	32
Policy Number	[redacted]
Policy Date	November 16, 2018
Basic Plan Amount	$25,000
Total Initial Amount	Re-Issued As Requested

This Policy is based on the Application and the payment of premiums to the Policy Anniversary shown under the heading Premiums Payable on page 3 while the Insured lives. State Farm Life Insurance Company will pay the Proceeds to the Beneficiary when due proof of the Insured's death is received.

30-Day Right to Examine this Policy. This Policy may be returned within 30 days of its receipt for a refund of all premiums paid. However, if You indicated on the Application for this Policy it will replace a life insurance or annuity policy, a longer period may be required by law in the state in which this Policy is delivered. Return may be made to State Farm Life Insurance Company or one of Our agents. If returned, this Policy will be void from the Policy Date.

Read this Policy with care. This is a legal contract between You and State Farm Life Insurance Company. In the event You need to contact someone about this Policy for any reason, please contact Your State Farm agent. If You have additional questions, You may contact Us at Our Home Office or (855) 534-0228 or www.statefarm.com.

Michael J. Tipsord

President

Lynne M. Youell

Secretary

BASIC PLAN DESCRIPTION

Whole life insurance with premiums payable to the Policy Anniversary shown under Premiums Payable on page 3 while the Insured is alive. Insurance is payable when the Insured dies. The Basic Plan is eligible for Annual Dividends.

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Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division
21 0147277

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Legal Division
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IMPORTANT INFORMATION

In the event You need to contact someone about this Policy for any reason, please contact Your State Farm agent. If You have additional questions, You may contact Us at statefarm.com® or the phone number shown on page 1.

If You have been unable to contact or obtain satisfaction from Your State Farm agent or Us, You may contact the insurance supervisory official where this Policy was issued. The phone numbers are shown below:

Alabama	334-269-3550	**Maine**	207-624-8475	**Oklahoma**	405-521-2828
Alaska	907-269-7900	**Maryland**	410-468-2090	**Oregon**	503-947-7984
Arizona	602-364-2499	**Massachusetts**	617-521-7794	**Pennsylvania**	717-787-2317
Arkansas	501-371-2600	**Michigan**	877-999-6442	**Puerto Rico**	787-304-8686
Colorado	303-894-7499	**Minnesota**	651-539-1500	**Rhode Island**	401-462-9520
Connecticut	860-297-3800	**Mississippi**	800-562-2957	**South Carolina**	803-737-6180
Georgia	404-656-2056	**Missouri**	573-751-3365	**Tennessee**	615-741-2241
Hawaii	808-586-2790	**Montana**	406-444-2040	**Texas**	800-252-3439
Idaho	208-334-4250	**Nebraska**	402-471-2201	**Utah**	801-538-3800
Illinois	217-782-4515	**Nevada**	775-687-0700	**Vermont**	802-828-3301
Indiana	317-232-2385	**New Hampshire**	603-271-2261	**Virginia**	804-371-9741
Iowa	515-281-5705	**New Jersey**	609-292-7272	**Washington**	360-725-7000
Kansas	785-296-3071	**New Mexico**	505-827-4601	**West Virginia**	304-558-3354
Kentucky	502-564-3630	**North Carolina**	855-408-1212	**Wisconsin**	608-266-3585
Louisiana	800-259-5300	**Ohio**	614-644-2658	**Wyoming**	307-777-7401

When contacting Your State Farm agent, Us, or the insurance supervisory official, please have the Policy Number for this Policy available.

ICC16 17904 20161101

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PO Box 2185, Lake Charles, LA 70602
Legal Division

POLICY IDENTIFICATION

Insured	JOHN-CLIFFORD JOSEPH KING, SR (Male)	Age	32
Policy Number	[redacted]	Basic Plan Amount	$25,000
Policy Date	November 16, 2018	Total Initial Amount	Re-issued As Requested
Issue Date	November 26, 2018	Policy Class	1
Owner	JOHN-CLIFFORD JOSEPH KING, SR		

SCHEDULE OF BENEFITS

Form	Description	Initial Amount	Benefit Period Ends	Annual Premium	Premiums Payable
11002	Basic Plan (20 Pay Whole Life) Class of Risk: Standard Male Non-Tobacco	$25,000	With Life	$578.75	To 2038
10200	Waiver of Premium *Shown below for each life insurance benefit Class of Risk: Standard Male Non-Tobacco Basic Plan		In 2038	* $5.25	To 2038

SCHEDULE OF PREMIUMS

Beginning	Annual	Semi-Annual	Quarterly	Monthly
November 16, 2021	$584.00	$299.01	$151.26	$50.81

If the premium paid is not the annual premium, the total amount of premium due each year is greater than the annual premium. Premiums other than the annual premium are increased to reflect the time value of money. Monthly premiums must be paid under one of the monthly payment plans made available. The premiums shown above include a policy fee. The policy fee for the annual premium is $50.00, for the semi-annual premium is $25.60, for the quarterly premium is $12.95, and for the monthly premium is $4.35.

ANNUAL DIVIDENDS

This Policy is eligible for annual dividends, but dividends are not guaranteed. The minimum Dividend Accumulation interest rate is 1% per year. See the Dividend Provisions on page 9.

Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
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SCHEDULE OF INSURANCE AND VALUES

- Insurance Amount - On Insured	Nov 16,	Guaranteed Values: End of Policy Year	Cash Value Dollars	Paid Up Insurance Dollars	Extended Term Ins Yrs	Extended Term Ins Days
$25,000	2020	2	40.25	200	1	139
25,000	2021	3	423.25	1,975	11	224
25,000	2022	4	821.00	3,700	18	43
25,000	2023	5	1,233.25	5,375	22	110
25,000	2024	6	1,660.75	7,000	25	107
25,000	2025	7	2,103.75	8,550	27	171
25,000	2026	8	2,562.50	10,075	29	93
25,000	2027	9	3,037.50	11,525	30	282
25,000	2028	10	3,529.25	12,950	32	9
25,000	2029	11	4,037.50	14,300	33	33
25,000	2030	12	4,562.50	15,625	34	8
25,000	2031	13	5,104.75	16,925	34	304
25,000	2032	14	5,665.00	18,175	35	209
25,000	2033	15	6,244.25	19,375	36	108
25,000	2034	16	6,844.25	20,550	37	21
25,000	2035	17	7,467.25	21,700	37	342
25,000	2036	18	8,113.50	22,825	39	31
25,000	2037	19	8,783.50	23,925	40	356
25,000	2038	20	9,477.25	25,000		
25,000	2039	21	9,782.50	25,000		
25,000	2040	22	10,093.50	25,000		
25,000	2041	23	10,409.25	25,000		
25,000	2042	24	10,729.25	25,000		
25,000	2043	25	11,053.50	25,000		
25,000	2044	26	11,383.50	25,000		
25,000	2045	27	11,719.75	25,000		
25,000	2046	28	12,062.00	25,000		
25,000	2047	29	12,408.50	25,000		
25,000	2048	30	12,757.00	25,000		
25,000	2049	31	13,106.50	25,000		
25,000	2050	32	13,456.50	25,000		
25,000	2051	33	13,807.25	25,000		
25,000	2052	34	14,159.25	25,000		
25,000	2053	35	14,514.00	25,000		
25,000	2054	36	14,871.75	25,000		
25,000	2055	37	15,233.25	25,000		
25,000	2056	38	15,598.00	25,000		
25,000	2057	39	15,965.00	25,000		
25,000	2058	40	16,331.25	25,000		

Continued on Next Page

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20211015

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Legal Division

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SCHEDULE OF INSURANCE AND VALUES

Continued from Page 4

- Insurance Amount - On Insured	Nov 16,	----------Guaranteed Values---------- End of Policy Year	Cash Value Dollars	Paid Up Insurance Dollars	Extended Term Ins Yrs Days
25,000	2059	41	16,694.50	25,000	
25,000	2060	42	17,055.50	25,000	
25,000	2046	Age 60	12,062.00	25,000	
25,000	2048	Age 62	12,757.00	25,000	
25,000	2051	Age 65	13,807.25	25,000	
25,000	2056	Age 70	15,598.00	25,000	

Guaranteed values at the end of any Policy Year presume payment of all specified premiums to the end of such Policy Year. The interest rate for guaranteed values and single premiums is 4.0% a year. The mortality table used is the Commissioners 2001 Standard Ordinary Composite Ultimate Mortality Table.

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DEFINITIONS

We, Us, and **Our** refer to State Farm Life Insurance Company.

You and **Your** refer to the Owner.

Application. Includes any life insurance application, medical history, questionnaire, and other documents from You or any other person proposed for insurance which are made a part of this Policy.

Basic Plan Amount. The amount of insurance on the Insured provided by the Basic Plan shown on pages 1 and 3.

Benefit Period Ends. The coverage for the benefit extends to, but does not include, the Policy Anniversary in the year shown on page 3 under this heading.

Cash Value. Sum of the Cash Values provided by the Basic Plan and any Riders.

Cash Surrender Value. Cash Value plus the Cash Value of any Paid-up Additions plus any Dividend Credits less any Loan and accrued Loan Interest.

Class of Risk. The underwriting class of the person insured.

Code. The U.S. Internal Revenue Code, as amended from time to time.

Dividend Credits. Any Dividend Accumulation or any current dividend under Dividend Option 1 or 3.

Dollars. Any money We pay, or which is paid to Us, must be in United States dollars.

Effective Date. Coverage starts on this date.

Initial Amount. The amount of coverage on the Effective Date of each benefit shown on page 3 under this heading.

Initial Payment. The amount shown on page 3 You must pay before this Policy becomes effective.

Insurance Amount. The amount of life insurance provided by the Basic Plan and any Rider on the Policy Anniversary Dates shown on page 4 under this heading.

Issue Date. The date this Policy is issued shown on page 3.

Officer. The president, a vice president, the secretary, or an assistant secretary of State Farm Life Insurance Company.

Payee. On the Insured's death, the Beneficiaries shown in the Application, unless changed. If You surrender this Policy while the Insured is alive, the persons that You have named to receive the Cash Surrender Value. A Payee can be other than a natural person only if We agree.

Policy Class. The classification of the Basic Plan shown on page 3 used to determine eligibility for Extended Term or Paid-up Insurance if this Policy lapses.

Policy Date. The Effective Date of this Policy shown on pages 1 and 3.

Policy Month, Year, or Anniversary. A policy month, year, or anniversary is measured from the Policy Date.

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DEFINITIONS (CONTINUED)

Premiums Payable. Premiums are payable until the Policy Anniversary shown on page 3 under this heading.

Proceeds. The sum of the insurance amounts payable under
(1) the Basic Plan,
(2) any Paid-up Additions, and
(3) any Rider on the Insured
plus any Dividend Credits, any dividend payable at the Insured's death, and any premium paid for part of the Payment Period beyond the Insured's date of death less any Loan, any accrued Loan Interest, and any part of a premium due.

Request. A written request signed by the person making the Request. Such Request must be received by Us and be on Our request form; or if such Request is not on Our request form, it must include the information required by Our request form.

Rider. Any benefit, other than the Basic Plan, made a part of this Policy.

Successor Owner. May be named in the Application or later by Request.

Total Initial Amount. The amount of life insurance on the Insured provided by the Basic Plan and any Rider on the Policy Date shown on pages 1 and 3.

GENERAL PROVISIONS

The Contract. This Policy contains the Basic Plan, any amendments, any endorsements, any Riders, and a copy of the Application. This Policy is the entire contract. We have relied on the statements in the Application in issuing this Policy. We reserve the right to investigate the truth and completeness of those statements. In the absence of fraud, those statements are representations and not warranties. Only statements in the Application will be used to rescind this Policy or deny a claim within the time period specified in the Incontestability provision.

Only an Officer has the right to change this Policy. No agent has the authority to change this Policy or to waive any of its terms. All endorsements, amendments, and Riders must be signed by an Officer to be valid.

We may modify this Policy after We notify You to assure continued qualification of this Policy as a life insurance contract under any section of, regulation or ruling under, the Code as amended from time to time. If We modify this Policy, We will send You the appropriate endorsement to be placed with this Policy. Such endorsement is subject to regulatory approval. If any provision of this Policy conflicts with the law of a jurisdiction that governs this Policy, the provision is deemed to be amended to conform to such law.

Transaction Delay. Any payment of the Cash Surrender Value or Loan will usually be made within 7 days of receipt of the Request for payment. We may defer payment of any Cash Surrender Value or Loan for up to 6 months from the date We receive Your Request. However, a Loan to pay a premium on other policies with Us will not be deferred.

If We defer any such payment for 30 days or more, We will pay interest in addition to such payment. Such interest accrues from the date the payment becomes payable to the date of payment at 2% per year or the interest rate and time required by law, if greater.

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Legal Division

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GENERAL PROVISIONS (CONTINUED)

Cash Surrender. You may surrender this Policy at any time by Request. All coverage ceases on the date We receive the Request or later date if You so indicate in Your Request. We will pay You the Cash Surrender Value as of the date coverage ceases plus any premium paid for the Payment Period beyond that date. We may defer paying You the Cash Surrender Value for up to 6 months after receiving Your Request.

Assignment. You may assign this Policy or any interest in it. We will recognize an assignment only if it is in writing and filed with Us. We are not responsible for the validity or effect of any assignment. An assignment may limit the interest of any Beneficiary. The assignment will take effect the date You sign the notice or the date You choose, subject to any payments made or actions taken by Us prior to receipt of this notice.

Error in Age or Sex. If the Insured's date of birth or sex is not as stated in the Application, We will adjust each benefit on the Insured to that which the most recent premium paid would have bought at the correct age and sex. Such adjustment will be based on the premium rates in effect on the issue date of the benefit.

Incontestability. Except for nonpayment of premiums, We will not contest the Basic Plan after it has been in force during the Insured's lifetime for 2 years from the Policy Date. Except for nonpayment of premiums, We will not contest any reinstatement after it has been in force during the lifetime of the Insured for 2 years from the Effective Date of the reinstatement. Any contest will be based on statements made in the Application that are material to the risk or the hazard assumed by Us.

Each Rider has its own incontestability provision.

Limited Death Benefit. If the Insured dies by suicide while sane or insane within 2 years from the Policy Date, the Basic Plan Amount will not be paid. The Proceeds in this case will be limited to the premiums paid on the Basic Plan less any Loan, accrued Loan Interest, and any dividends paid on the Basic Plan. If the Insured dies by suicide while sane or insane within 2 years from the date this Policy is reinstated, the Basic Plan Amount will not be paid. The Proceeds in this case will be limited to the premiums paid on the Basic Plan since the date of reinstatement less any Loan, accrued Loan Interest, and any dividends paid on the Basic Plan.

Each Rider has its own limited death benefit provision.

Conformity with Interstate Insurance Product Regulation Commission Standards. This Policy was approved under the authority of the Interstate Insurance Product Regulation Commission and issued under the Commission standards. Any provision in this Policy that on the provision effective date is in conflict with Interstate Insurance Product Regulation Commission standards for this type of product is hereby amended to conform to the Interstate Insurance Product Regulation Commission standards for this type of product as of the provision's effective date.

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Calcasieu Parish Sheriff's Office
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OWNERSHIP PROVISIONS

Owner. The Owner is as named in the Application, unless changed. You may exercise any policy provision only by Request and while the Insured is alive, subject to the rights of any assignee that We have on record and to the rights of any irrevocably designated Beneficiary. The Successor Owner will become the Owner of this Policy if You die while this Policy is in force.

Change of Owner/Successor Owner. You may change the Owner or Successor Owner by Request while the Insured is alive and this Policy is in force. The change will take effect the date You sign the Request, unless You specify a later date. The change will not affect any action We have taken before We receive the Request. A change of Owner or Successor Owner does not change the Beneficiary Designation.

PREMIUM PROVISIONS

Payment of Premiums. You may pay premiums at Our Home Office or to one of Our agents. We will give You a receipt signed by one of Our Officers, if You request one.

The first premium is due on the Policy Date. All other premiums are payable on or before their Due Dates. A Due Date is the first day of each Payment Period. A Payment Period may be 1 month, 3 months, 6 months, or 12 months, starting on the same date of the month as the Policy Date. If the Payment Period is 1 month, the monthly premium is due at the start of each 1-month Payment Period. If the Payment Period is 3 months, the quarterly premium is due at the start of each 3-month Payment Period. If the Payment Period is 6 months, the semi-annual premium is due at the start of each 6-month Payment Period. If the Payment Period is 12 months, the annual premium is due at the start of each 12-month Payment Period. If the Due Date does not appear in a calendar month's days, the Due Date will be the last day of that same month. You may change the Payment Period on any Due Date by paying the premium for the new period, but You cannot change the Payment Period if premiums are being waived.

Grace Period. Except for the first premium, 31 days are allowed for the payment of a premium after its Due Date. During this time, the policy benefits continue. Any premium payment sent by U.S. mail with a postmark before the end of the Grace Period will be considered paid during the Grace Period.

Nonpayment of Premium. If any premium has not been paid by the end of its Grace Period and that premium cannot be paid either from Dividend Accumulations or by Loan, this Policy will lapse as of the Due Date of any unpaid premium. With such lapse, coverage ceases unless continued as Extended Term or Paid-up Insurance.

Accumulations to Avoid Lapse. This provision will apply if You send Us a Request. If this provision applies, Dividend Accumulations will be used to pay any premium not paid by the end of its Grace Period. Any unpaid balance of that premium will be due the day after the end of the partial Payment Period. A new Grace Period will be allowed for the payment of this unpaid balance. We will send You a notice if any Dividend Accumulation is used to pay part of any premium.

You may cancel this provision at any time. If You cancel this provision within 90 days after the premium Due Date, any Dividend Accumulations will be recredited. Your choice will take effect as of the premium Due Date.

Automatic Premium Loan. This provision will apply if You chose it on the Application or later by Request. This provision will apply if there is enough Loan Value less any existing Loan and accrued Loan Interest to pay the unpaid premium for the current Payment Period and there are no available Dividend Accumulations. Any premium or part of any premium that is not paid by the end of its Grace Period will be paid by Loan. Loan Interest will be charged from the Due Date of the unpaid premium. You may cancel this provision at any time by Request. We must receive Your Request to elect or cancel this provision before this Policy lapses.

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PREMIUM PROVISIONS (CONTINUED)

Reinstatement. If You have not surrendered this Policy for cash, You may apply to reinstate it within 5 years after lapse. You must give Us proof of the Insured's insurability that is satisfactory to Us. You must pay all unpaid premiums with interest from their Due Dates. The interest rate is 6% a year. You must repay or restore any Loan at the time of lapse with compound interest, based on the Loan Interest Rates in effect during the period of lapse, to the date of reinstatement. The amount restored cannot be greater than the Loan Value on the date of reinstatement. Reinstatement will take effect on the date We approve the Insured's insurability.

Premium Adjustment When the Insured Dies. If the Insured dies during a Grace Period, any part of a premium due will be paid from the Proceeds. Any premium paid for the Payment Period beyond the Insured's death will be part of the Proceeds.

DIVIDEND PROVISIONS

Annual Dividends. We may apportion and pay dividends each year. Any such dividends will be paid only at the end of a Policy Year. There is no right to a partial or prorated dividend prior to the end of a Policy Year. Such dividends will not be paid if all premiums due have not been paid or if the Basic Plan is in force as Extended Term Insurance.

Dividend Options. You may choose to have Your dividend used under one of these options:

1. Premium Payment. We will apply it toward payment of a premium then due.

2. Paid-up Additions. We will use it to buy a paid-up life insurance addition to the Basic Plan. Each addition is bought at the single premium rate for the Insured's sex and attained age at that time. We may also pay an annual dividend on these Paid-up Additions. You may surrender Paid-up Additions for their Cash Value at any time. The Cash Value of Paid-up Additions is based on the single premium rate for the Insured's sex and attained age on the date surrendered. If surrendered prior to the end of the Policy Year, there is no right to a partial or prorated dividend. Paid-up Additions in force at the Insured's death will be part of the Proceeds.

3. Dividend Accumulation. We will hold it at interest. We will credit interest at a rate not less than the interest rate shown on page 3. Such interest will be paid only at the end of the Policy Year. You may withdraw all or part of the Dividend Accumulation at any time. If withdrawn prior to the end of the Policy Year, there is no right to a partial or prorated credit of such interest. The Dividend Accumulation plus interest to the Insured's death will be part of the Proceeds.

4. Cash. We will pay it to You in cash.

If You do not choose a Dividend Option on the Application or the Dividend Option chosen is not available, We will use Dividend Option 2. You may change the Dividend Option by Request. The change will apply only to dividends paid after We receive Your Request.

Dividend When the Insured Dies. We may pay a dividend when the Insured dies. Such dividend will be a partial or prorated amount based on the period from the start of a Policy Year to the Insured's death.

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GUARANTEED VALUES PROVISIONS

Guaranteed Values. The Guaranteed Values shown on page 4 are based on Your payment of all premiums when they are due. These values are as of the end of the Policy Years shown. They do not include the Cash Value of any Paid-up Additions and will be adjusted for any Dividend Credits or Loan on this Policy. If requested, We will furnish You with any values not shown.

Cash Value. The Cash Value is the sum of the Cash Value of the Basic Plan and any Riders. Any Cash Values on the Basic Plan not shown on page 4 will be calculated as specified in the Basis of Computation provision. The Cash Value will be based on the date to which premiums have been paid. If any amount of premium is due and not paid, the Cash Value for the 90 days after that Due Date is the same as on such Due Date. The Cash Value on any date between Policy Anniversaries is determined by interpolating between the Cash Value on the Policy Anniversary immediately before and after that date for the time period from the previous Policy Anniversary to that date plus any premium paid for the Payment Period beyond that date.

If the Basic Plan has been in force for more than 90 days as Extended Term or Paid-up Insurance, the Cash Value is the single premium for the insurance remaining. The Cash Value of such insurance will not decrease during the 31 days after a Policy Anniversary.

Extended Term and Paid-up Insurance. If this Policy lapses and there is a Cash Surrender Value, We will continue the Basic Plan as Extended Term or Paid-up Insurance. Extended Term Insurance is available only if this Policy is in Policy Class 1 or 2. Extended Term Insurance will be used at the time of lapse unless You choose to continue this Policy as Paid-up Insurance or surrender this Policy. If this Policy is in Policy Class 3, Paid-up Insurance will be used at the time of lapse unless You surrender this Policy.

You may choose by Request to have the Basic Plan continued as Paid-up Insurance or, if this Policy is not in Policy Class 3, as Extended Term Insurance. To be effective on the Due Date of any unpaid premium, Your Request must be received by Us within 90 days after that date.

The amount of Extended Term Insurance will be the Basic Plan Amount plus the amount of any Paid-up Additions plus any Dividend Credits less any Loan and accrued Loan Interest. The amount will stay level. The extended term period will be determined by applying the Cash Surrender Value as a single premium at the Insured's sex and attained age on the Due Date of any unpaid premium. If there is more value than needed to provide Extended Term Insurance for life, We will promptly pay You the excess in one sum. Extended Term Insurance has no Loan Value and will receive no dividends.

The amount of Paid-up Insurance will be determined by applying the Cash Value plus the Cash Value of any Paid-up Additions less any Loan and accrued Loan Interest as a single premium at the Insured's sex and attained age on the Due Date of any unpaid premium. The amount will stay level. Paid-up Insurance has Loan Value and may be eligible for dividends. Any Dividend Accumulation at the time this Policy is continued as Paid-up Insurance will not be affected.

Basis of Computation. The Guaranteed Values in this Policy are at least as large as the minimum values and benefits required by the NAIC Standard Nonforfeiture Law for Life Insurance, model #808. A statement of how these values are determined has been filed with The Interstate Insurance Product Regulation Commission.

The Guaranteed Values and single premiums are based on the Insured's age last birthday and sex. It is assumed that premiums are paid continuously and claims are paid immediately. The interest rate is shown on page 4. For Guaranteed Values and single premiums, the mortality tables that We use are shown on page 4. The Cash Values for the Basic Plan for Policy Anniversaries not shown on page 4 are equal to the reserves which are calculated using the Commissioners Reserve Valuation Method.

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POLICY LOAN PROVISIONS

Loan. You may borrow against this Policy by Request at any time, unless the Basic Plan is in force as Extended Term Insurance. This Policy is the sole security for such Loan. We may defer a Loan for up to 6 months after receiving Your Request unless the Loan will be used to pay premiums on this or other policies with Us.

You may borrow the Loan Value less any existing Loan, accrued Loan Interest, and unpaid premiums. If Your unpaid Loan plus accrued Loan Interest exceeds the Cash Value of this Policy plus the Cash Value of any Paid-up Additions, We will send You a policy termination notice. This Policy will terminate 31 days after We have mailed that notice to You and to any assignee of record. If this occurs and is the result of a change in the Loan Interest Rate, this Policy will terminate at the later of the end of the Policy Year or 31 days after mailing of the notice. At policy termination, We will then pay You any Dividend Accumulation.

Loan Value. The Loan Value is the Cash Value of this Policy and the Cash Value of any Paid-up Additions on the next Policy Anniversary less any unpaid premiums for the current Policy Year discounted at the Loan Interest Rate from that Policy Anniversary to the date of the Loan. If premiums are no longer payable, the Loan Value will be the Cash Value of this Policy and the Cash Value of any Paid-up Additions on the next Policy Anniversary discounted at the Loan Interest Rate from that Policy Anniversary to the date of the Loan.

Loan Interest Rate. The Loan Interest Rate is an adjustable rate. We determine the rate each calendar quarter. Such rate will take effect the first day of January, April, July, and October after the date We determine it. Such rate will apply to any new and existing Loan under this Policy.

Any change in the rate will be subject to the following:

(1) The rate will be lowered to be equal to or less than the legal maximum rate if such legal maximum is 0.5% or more a year lower than Our rate then in effect.
(2) The rate may be increased by at least 0.5% a year if the legal maximum is 0.5% or more a year higher than Our rate then in effect. Such rate cannot exceed the legal maximum.

The legal maximum interest rate is the greater of:

(1) the Moody's Corporate Bond Yield Average - Monthly Average Corporates as published by Moody's Investors Service, Inc. for the calendar month ending 2 months prior to the date the Loan Interest Rate is to go into effect, or
(2) the interest rate used to calculate Cash Values under this Policy during the period for which the Loan Interest Rate is being determined plus 1% a year.

If the Moody's Corporate Bond Yield Average - Monthly Average Corporates is no longer published, the rate used in its place will be set by law or regulation of the insurance supervisory official in the jurisdiction where this Policy was delivered.

We will:

(1) notify You of the initial Loan Interest Rate at the time a Loan is made, unless it is an Automatic Premium Loan;
(2) notify You of the initial Loan Interest Rate as soon as practical after an Automatic Premium Loan is made; and
(3) give You advance notice of any increase in the Loan Interest Rate, if You have a Loan at that time.

We charge interest each day on any Loan. Loan Interest is due at the end of each Policy Year or at the time the Loan is repaid, if earlier. Loan Interest is added to the Loan if not paid when due.

Loan Repayment. You may repay all or part of a Loan at any time before the Insured dies or this Policy is surrendered. Any Loan that We deducted when the Basic Plan was placed on Extended Term or Paid-up Insurance may be repaid or restored only if the Basic Plan is reinstated.

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PAYMENT OF BENEFITS PROVISIONS

Beneficiary Designation. This is as shown in the Application, unless You have made a change by Request. It includes the name of the Beneficiary. If You name "estate" as a Beneficiary, it means the executors or administrators of the last survivor of You and all Beneficiaries. If You name "children" of a person as a Beneficiary, only children born to or legally adopted by that person will be included. We may rely on an affidavit as to the ages, names, and other facts about all Beneficiaries. We will incur no liability if We act on such affidavit.

Change of Beneficiary Designation. You may make a change by Request while the Insured is alive and this Policy is in force. The change will take effect on the date Your Request is signed, unless You specify a later date. The change will not affect any action We have taken before We receive the Request. To change a named irrevocable Beneficiary, the Request must include a written consent from the irrevocable Beneficiary who is being changed.

Order of Payment on the Insured's Death. When the Insured dies, We will make payment in equal shares to the primary Beneficiaries living when payment is made. If the last primary dies, We will make payment in equal shares to the successor Beneficiaries living when payment is made. If, at any time, no Beneficiary is living, We will make a one sum payment to You, if living when payment is made. Otherwise, We will make a one sum payment to the estate of the last survivor of You and all Beneficiaries. You may change this order of payment by Request while the Insured is alive.

Methods of Payment. We will pay the Proceeds or the Cash Surrender Value under the One Sum Method unless You choose another method then available. If the Payee is other than a natural person, We will make payment under the One Sum Method.

All payment intervals are measured from the date this Policy is surrendered or from the date the Insured dies.

After the Insured's death, a Payee who has the right to make a withdrawal may change the method of payment. This Payee may also appoint a successor payee. The successor payee may be the Payee's estate.

We must receive a Request for payment of the Proceeds and due proof of the Insured's death. Due proof of the Insured's death is evidence satisfactory to Us:

(1) to establish the date and fact of the Insured's death;
(2) to permit Us to determine whether Proceeds are payable; and
(3) such other items and information as may be necessary for Us to comply with laws and regulations related to payment of the claim or administration of the business of insurance.

Method 1 (One Sum Method). We will pay the Cash Surrender Value or the Proceeds in one sum. Interest will be paid from the date of the Insured's death to the date of payment. The interest rate will be the greater of 2% a year or the interest rate applicable to Proceeds left on deposit with Us.

Method 2 (Other Method). Payment by any other method may be made if We agree.

Interest on Delayed Payment of Proceeds. Additional interest at the rate of 10% a year will be credited to Proceeds if the payment of Proceeds is delayed more than 31 calendar days after the latest of the following dates:

(1) the date We receive due proof of the Insured's death;
(2) the date We receive sufficient information to determine Our liability, the extent of the liability, and the appropriate Beneficiary legally entitled to the Proceeds; and
(3) the date legal impediments to payment of the Proceeds that depend on the action of parties other than Us are resolved and sufficient evidence of the same is provided to Us. Legal impediments to payment include, but are not limited to, (a) the establishment of guardianships and conservatorships; (b) the appointment and qualification of trustees, executors and administrators; and (c) the submission of information required to satisfy state and federal reporting requirements.

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WAIVER OF PREMIUM BENEFIT RIDER

General. This Rider is part of this Policy. It is based on the Application for this Rider and the payment of premiums. The premiums for this Rider are shown on page 3. Only certain policy provisions are a part of this Rider. They are "Definitions," "Ownership," "Premium," "The Contract," "Assignment," and "Error in Age or Sex." The provisions of this Rider apply in lieu of any other Policy provisions to the contrary. This Rider does not have Cash Value or Loan Value.

Waiver of Premium Benefit. We will waive each premium due as defined below if the Insured becomes totally disabled while this Rider is in force and such Total Disability has existed for 6 continuous months during the lifetime of the Insured as follows:

(1) If the Insured becomes totally disabled prior to the Policy Anniversary when the Insured is age 60, We will waive each premium due until the Policy Anniversary when the Insured is age 65 as long as the Total Disability continues. If the Insured is totally disabled as defined below on the Policy Anniversary when the Insured is age 65, We will waive all future premiums due.

(2) If the Insured becomes totally disabled on or after the Policy Anniversary when the Insured is age 60 and prior to the Policy Anniversary when the Insured is age 62, We will waive each premium due until the Policy Anniversary when the Insured is age 65 as long as the Total Disability continues. We will not waive any premium due on or after the Policy Anniversary when the Insured is age 65.

(3) If the Insured becomes totally disabled on or after the Policy Anniversary when the Insured is age 62 and prior to the Policy Anniversary when the Insured is age 65, We will waive each premium due until the third Policy Anniversary after Total Disability starts as long as the Total Disability continues. We will not waive any premium due on or after the third Policy Anniversary after Total Disability starts.

We will only waive premiums due on and after Total Disability starts. No premium will be waived which was due more than one year prior to the date We receive notice of claim. While premiums are waived, all benefits continue as though You had paid the premiums.

A recurrence of a Total Disability for which We had been waiving premiums will be deemed a continuation of the prior period of Total Disability if the recurrence:

(1) results from the same injury or disease that caused the previous Total Disability;
(2) starts within 6 months of the date the previous Total Disability ended; and
(3) starts while this Rider is still in force.

Such recurrent Total Disability will not be subject to a new requirement that the Total Disability must first exist for 6 continuous months during the Insured's lifetime.

Total Disability Defined. Total Disability is a condition caused by injury or disease. During the first 24 months after Total Disability starts, this condition must prevent the Insured from performing substantially all of the work of the Insured's regular occupation. After the first 24 months after Total Disability starts, the condition must prevent the Insured from performing substantially all of the work in any occupation for which the Insured is, or becomes, reasonably qualified based upon education, training, or experience. The Insured's total and irrecoverable loss, caused by injury or disease, of any of the following will be considered Total Disability even if the Insured is able to work:

(1) sight in both eyes.
(2) use of both hands.
(3) use of both feet.
(4) use of one hand and one foot.

Disabilities Not Covered. We will not waive premiums if Total Disability:

(1) starts before the Effective Date of this Rider unless such disability was disclosed in the Application,
(2) starts before the Policy Anniversary when the Insured is age 5,
(3) results from an intended self-injury, or
(4) results from any act due to war whether or not the Insured is in the military service. "War" means declared or undeclared war or conflict involving the armed forces of one or more countries, governments, or international organizations.

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WAIVER OF PREMIUM BENEFIT RIDER (CONTINUED)

Notice and Proof of Total Disability. We must receive notice of a claim and due proof of Total Disability while the Insured is alive and totally disabled. If this is not done, You should submit such notice and proof as soon as reasonably possible. We may also require You to submit proof of the Insured's continuing Total Disability at reasonable intervals, but no more frequently than once every 30 days during the first 24 months after Total Disability starts. If You do not submit proof when We require it, no further premiums will be waived. Failure to give such proof will not invalidate or diminish any claim if it can be shown that proof was given as soon as was reasonably possible. We will not require proof more than once a year after the Total Disability has lasted more than 2 years. We will not require proof after the Policy Anniversary when the Insured is age 65.

Premium Payments. If the Insured's Total Disability starts during a Grace Period, the unpaid premium must be paid before a claim will be approved. We may charge interest on that premium from the end of the Grace Period to the date paid at 6% a year. You must pay all premiums that come due until We approve the claim. We will refund any premium that You paid after Total Disability starts which is later waived. If the Insured dies before such refund is made, We will include that amount in the Proceeds.

Termination. This Rider will terminate on the Policy Anniversary shown on page 3 under Benefit Period Ends. We will terminate this Rider before that date when:

(1) this Policy is terminated by surrender or lapse or
(2) the Basic Plan is continued as Extended Term or Paid-up Insurance.

You may terminate this Rider by Request. This Rider will terminate on the date We receive Your Request. We will revise page 3 of this Policy to show this change. Any premium paid for the payment period beyond the date this Rider terminates will be paid to You.

Termination will not affect any claim for Total Disability which starts before termination.

Incontestability. Except for nonpayment of premiums, We will not contest this Rider after it has been in force during the lifetime of the Insured for 2 years from the Effective Date of this Rider unless the Insured becomes totally disabled within that period. We will not contest any reinstatement of this Rider after it has been in force during the lifetime of the Insured for 2 years from the Effective Date of any reinstatement unless the Insured becomes totally disabled within that period. Any contest will be based on material statements contained in the Application.

Effective Date of this Rider. This is the date coverage starts. It is the same as the Policy Date of this Policy unless a different date for this Rider is shown on page 3.

State Farm Life Insurance Company

Michael J. Tipsord
President

Lynne M. Yowell
Secretary

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Application
Individual Life Insurance

State Farm

State Farm Life Insurance Company
1 State Farm Plaza, Bloomington, IL 61710-0001

1 Select Application Type

- (•) New policy
- ( ) Change to an existing policy/added benefits
- ( ) Term conversion with increase in amount
- ( ) Universal Life increase
- ( ) Select Term re-entry

Indicate the existing policy number(s)

2 Personal Information - Proposed Insured 1

KING (Last name) JOHN (First name) (Middle name)

[redacted]

Sex: (•) Male ( ) Female

Marital status: Married Citizenship: (•) United States ( ) Mexico ( ) Canada ( ) Other

32 (Age) [redacted] (DD/YYYY)

LA (State of birth) 6 / 0 (Height (feet/inches)) 222 (Weight (lbs)) [redacted] (e number) LA (State)

[redacted] Laborer (Occupation) SASOL (Employer)

Annual household income: ( ) 0 - $25,000 ( ) $25,001 - $50,000 ( ) $50,001 - $100,000 ( ) $100,001 or more

Do you work in one of the following occupations: amusement, construction, diving, explosives, gas/oil, liquor, logging, mining, sports? ( ) Yes (•) No *If yes, please describe your exact duties:*

3 Personal Information - Proposed Insured 2/Additional Insured/Payor

Last name First name Middle name

Address

City State ZIP Code

Doc type 01.01

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Marital status: _____ If married, is Proposed Insured 2 married to Proposed Insured 1? ○ Yes ○ No (not applicable if Payor)

Citizenship: ○ United States ○ Mexico ○ Canada ○ Other Sex: ○ Male ○ Female Age _____ Date of birth (MM/DD/YYYY) _____

State of birth _____ Height (feet/inches) _____/_____ Weight (lbs) _____ Driver's license number _____ State _____

SSN/ITIN _____ Occupation _____ Employer _____

Do you work in one of the following occupations: amusement, construction, diving, explosives, gas/oil, liquor, logging, mining, sports? ○ Yes ○ No *If yes, please describe your exact duties:*

4 Add Applicant/Owner Information

Complete this section if the Owner is not the Proposed Insured 1 named in Section 2.

Applicant/Owner

Last name _____ First name _____ Middle name _____

Address _____

City _____ State _____ ZIP Code _____

SSN/ITIN/TIN _____ Date of birth (MM/DD/YYYY) _____ Relationship to Proposed Insured 1 _____

Successor Owner

Complete this section unless Applicant/Owner is a trust or corporation. A Successor Owner is recommended for juvenile applications.

Last name _____ First name _____ Middle initial _____

SSN/ITIN/TIN _____ Date of birth (MM/DD/YYYY) _____

5 Proposed Insured Under Age 16

a. Do you want Proposed Insured 1 to become Owner of policy at, and after, age 21? ○ Yes ○ No

b. Please indicate total amount of life insurance on: Parent/Guardian 1 $ _____ ☐ Select if none

Parent/Guardian 2 $ _____ ☐ Select if none

6 Select Coverages and Policy Provisions

Complete appropriate section based on product selection.

◉ Term Life and Whole Life

○ Universal Life/Joint Universal Life/Survivorship Universal Life

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a. Term Life and Whole Life

i. Policy and Amount

Basic Policy Type:

○ Select Term-10	○ Return of Premium Term-30	○ 10 Pay Whole Life
○ Select Term-20	○ Mortgage Life (Decreasing Term)-15	○ 15 Pay Whole Life
○ Select Term-30	○ Mortgage Life (Decreasing Term)-30	◉ 20 Pay Whole Life
○ Return of Premium Term-20	○ Whole Life	○ Single Premium Whole Life

$ 25,000
Amount applied for

ii. Riders/Benefits

Waiver of Premium (Proposed Insured 1 only): ◉ Yes ○ No

☐ Guaranteed Insurability Option: $ _____

☐ Children's Term Rider: _____ units
CTR unit = $1,000, minimum is 5 units, maximum is 20 units

☐ Payor (Please complete information for Proposed Insured 2)

	Proposed Insured 1	Proposed Insured 2
☐ Select Term-10	$ _____	$ _____
☐ Select Term-20	$ _____	$ _____
☐ Select Term-30	$ _____	$ _____
☐ Mortgage Life (Decreasing Term)-15	$ _____	$ _____
☐ Mortgage Life (Decreasing Term)-30	$ _____	$ _____

iii. Premium Amount and Mode of Premium Payment

Amount of premium submitted with application: $ 50.81

Mode of premium payment: Special Monthly

iv. Dividend Options

Dividends are not guaranteed. *Please select a dividend option from the list provided. If the selected option is unavailable, the policy provisions will determine the option.*

○ Accumulation ○ Cash ◉ Paid-up Additions (not available on Term Life) ○ Reduce Premium

v. Automatic Premium Loan (APL)

Automatic Premium Loan (APL) is a policy provision, available for some policy types, that a policyowner may elect. If any premium remains unpaid at the end of the Policy's grace period, a loan against the cash value is automatically made to pay the unpaid premium. Do you want the APL provision to apply, if available? ◉ Yes ○ No

7 Designate Your Beneficiaries

If additional beneficiary fields are needed, please include in Explanations, Section 17.

a. Proposed Insured 1

Primary Beneficiary(ies)

If there will be multiple primary beneficiaries, allocate equally to all primary beneficiaries: ○ Yes ◉ No

(If "Yes" is selected, do not enter any beneficiary allocation below. If "No" enter the desired allocations below.)

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☒ **Individual**

Name (First name, Middle initial, Last name)	Address, City, State of residence, ZIP Code *(optional)*	Relationship to insured*	Date of birth *(MM/DD/YYYY) (optional)*	Beneficiary Allocation %
COLSTON-KING, CHARMAINE	[redacted]	Spouse	[redacted]	100

** If relationship is Friend, Relative or Other, please provide this person's insurable interest in Explanations, Section 17.*

☐ **Organization** *(enter Beneficiary Allocation):* _____ %

Name of organization: _____

Address, City, State, ZIP Code *(optional):* _____

Preferred phone number *(optional):* _____

☐ **Estate** *(enter Beneficiary Allocation):* _____ %

☐ **Beneficiary Class/Trust** *(enter Beneficiary Allocation):* _____ %

Secondary Beneficiary(ies)

If there will be multiple secondary beneficiaries, allocate equally to all secondary beneficiaries: ○ Yes ○ No

(If "Yes" is selected, do not enter any beneficiary allocation below. If "No" enter the desired allocations below.)

☒ **Individual**

Name (First name, Middle initial, Last name)	Address, City, State of residence, ZIP Code *(optional)*	Relationship to Insured	Date of birth *(MM/DD/YYYY) (optional)*	Beneficiary Allocation %
COLSTON, DWADE	[redacted]	Brother/Sister	[redacted]	100

☐ **Organization** *(enter Beneficiary Allocation):* _____ %

Name of organization: _____

Address, City, State, ZIP Code *(optional):* _____

Preferred phone number *(optional):* _____

☐ **Estate** *(enter Beneficiary Allocation):* _____ %

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☐ **Beneficiary Class/Trust** *(enter Beneficiary Allocation):*_____ %

b. Proposed Insured 2

Primary Beneficiary(ies)

If there will be multiple primary beneficiaries, allocate equally to all primary beneficiaries: ○ Yes ○ No

(If "Yes" is selected, do not enter any beneficiary allocation below. If "No" enter the desired allocations below.)

☐ **Individual**

Name (First name, Middle Initial, Last name)	Address, City, State of residence, ZIP Code *(optional)*	Relationship to Insured*	Date of birth *(MM/DD/YYYY) (optional)*	Beneficiary Allocation %

** If relationship is Friend, Relative or Other, please provide this person's insurable interest in Explanations, Section 17.*

☐ **Organization** *(enter Beneficiary Allocation):*_____ %

Name of organization: _____

Address, City, State, ZIP Code *(optional):* _____

Preferred phone number *(optional):* _____

☐ **Estate** *(enter Beneficiary Allocation):*_____ %

☐ **Beneficiary Class/Trust** *(enter Beneficiary Allocation):*_____ %

Secondary Beneficiary(ies)

If there will be multiple secondary beneficiaries, allocate equally to all secondary beneficiaries: ○ Yes ○ No

(If "Yes" is selected, do not enter any beneficiary allocation below. If "No" enter the desired allocations below.)

☐ **Individual**

Name (First name, Middle Initial, Last name)	Address, City, State of residence, ZIP Code *(optional)*	Relationship to Insured	Date of birth *(MM/DD/YYYY) (optional)*	Beneficiary Allocation %

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☐ **Organization** *(enter Beneficiary Allocation):*_____ %

Name of organization: _____

Address, City, State, ZIP Code *(optional):* _____

Preferred phone number *(optional):* _____

☐ **Estate** *(enter Beneficiary Allocation):*_____ %

☐ **Beneficiary Class/Trust** *(enter Beneficiary Allocation):*_____ %

8 Children's Term Rider

Coverage does not begin until a child is 15 days old.

Do you have any children (including stepchildren or legally adopted children) under 18 years old? ○ Yes ○ No

List children under age 18, if any. For relationship to Proposed Insured (PI), please indicate Child, Stepchild or Legally Adopted Child.

Name (First name, Middle initial, Last name)	Sex	Relationship to PI 1	Relationship to PI 2 (Joint Universal Life only)	Date of birth (MM/DD/YYYY)	Amount of life insurance on child*
	○ Male ○ Female				$
	○ Male ○ Female				$
	○ Male ○ Female				$
	○ Male ○ Female				$

**Excludes the amount being applied for and group insurance.*

If additional space is needed for children's names, please include in Explanations, Section 17.

9 Children's Term Rider/Juvenile Medical Information

a. In the last **10 years**, has Proposed Insured 1, or any children named in Children's Term Rider Section 8, been diagnosed, treated or given advice by a member of the medical profession for any of the following? *(select all that apply):*

☐ Anemia ☐ Cancer ☐ Impairment of sight, hearing or speech ☐ Leukemia
☐ Asthma ☐ Diabetes ☐ Mental Disorder
☐ Birth Defect ☐ Heart Murmur ☐ Kidney Disease ☐ Seizure

☐ **None of the above**

If any are selected, please provide a detailed explanation in the space provided in Explanations, Section 17.

b. Has Proposed Insured 1, or any children named in Children's Term Rider Section 8, ever tested positive for or been diagnosed by a member of the medical profession with:

- Human Immunodeficiency Virus (HIV) ○ Yes ○ No
- Acquired Immune Deficiency Syndrome (AIDS) ○ Yes ○ No

If any are selected "yes," please provide a detailed explanation in the space provided in Explanations, Section 17.

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c. In the last **three (3) years**, has Proposed Insured 1, or any children named in Children's Term Rider Section 8, seen a member of the medical profession for any reason not previously explained (excluding routine physical examinations with normal findings)? ○ Yes ○ No

If yes, please provide a detailed explanation in the space provided in Explanations, Section 17.

10 Other - Life Insurance or Annuities

In Force Coverage

These questions should be completed by Proposed Insured(s).

a. What is the total amount of life insurance in force from all companies (excluding group insurance)?

Proposed Insured 1 $ 0 - 250,000 Proposed Insured 2 $ _____

Replacement of Life Insurance or Annuities

If Proposed Insured 1 will not be the Owner, these questions should be completed by Applicant.

b. Do you own any life insurance or annuities on yourself or others? ○ Yes ◉ No

- If yes, is the policy being applied for a replacement of any of those policies:
  - Are you considering discontinuing making premium payments, surrendering, forfeiting, assigning to the insurer, or otherwise terminating your existing policy or contract? ○ Yes ○ No
  - Are you considering using funds from your existing policies or contracts to pay premiums due on the new policy or contract? ○ Yes ○ No

Other Transactions

All states except OH: These questions should be completed by Applicant when Proposed Insured(s) is age 50 or over, and face amount of policy is $500,000 or greater.

OH: These questions should be completed by Applicant when the Proposed Insured is age 16 or over. If you answer "yes" to any of these questions, please provide a detailed explanation in the space provided in Explanations, Section 17.

c. Have you entered into, or are you considering plans to enter into, any agreement to sell, transfer, or assign any ownership or rights to this policy or its benefits? ○ Yes ○ No

d. Have you received or do you anticipate receiving any type of inducement, fee, or compensation as an incentive to purchase the policy you are applying for? ○ Yes ○ No

Sections 11 through 15 are required for all applications when Proposed Insured is age 16 and up. Provide a detailed explanation for all "Yes" answers in Explanations, Section 17.

11 Additional Insurance Information

	Proposed Insured 1	Proposed Insured 2
a. Have you ever had an application for life insurance declined or postponed?	○ Yes ◉ No	○ Yes ○ No
b. In the last **three (3) years**, have you claimed or received any disability benefits because of injury or sickness?	○ Yes ◉ No	○ Yes ○ No

12 Medical Information

	Proposed Insured 1	Proposed Insured 2
a. Have you ever tested positive for or been diagnosed by a member of the medical profession with:		
• Human Immunodeficiency Virus (HIV)	○ Yes ◉ No	○ Yes ○ No
• Acquired Immune Deficiency Syndrome (AIDS)	○ Yes ◉ No	○ Yes ○ No

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	Proposed Insured 1	Proposed Insured 2
b. In the last **three (3) years**, have you been treated, diagnosed, or advised by a member of the medical profession as follows? *(If yes, select all that apply.)*	○ Yes ◉ No	○ Yes ○ No
• Hospitalized or surgically treated for chest pain or any disorder of the heart?	☐	☐
• Hospitalized or surgically treated for stroke or mini-stroke (transient ischemic attack/TIA)?	☐	☐
• Diagnosed with, or are you currently being treated for, cancer (excluding basal cell and squamous cell cancer of the skin)?	☐	☐
• Diagnosed with any kidney disorder that requires current dialysis treatment?	☐	☐
• Advised to have further evaluation or testing (except for HIV) to determine a diagnosis; or had surgery recommended that has not been performed?	☐	☐

13 Criminal Charges and Convictions

	Proposed Insured 1	Proposed Insured 2
a. In the last **three (3) years**, have you been involved in any of the following? *(If yes, select all that apply.)*	○ Yes ◉ No	○ Yes ○ No
• Convicted of or pleaded guilty to any felony?	☐	☐
• Charged with a crime (with charges pending at this time)?	☐	☐
• Placed on parole or probation?	☐	☐
• Incarcerated or facing incarceration as the result of a guilty plea or conviction?	☐	☐
b. In the last **three (3) years**, have you been convicted of or pleaded guilty to driving under the influence of alcohol or drugs?	○ Yes ◉ No	○ Yes ○ No

14 Lifestyle and Travel Information

	Proposed Insured 1	Proposed Insured 2
Travel Information		
a. Are you **currently** residing or traveling in any country outside of the United States or Canada?	○ Yes ◉ No	○ Yes ○ No
b. In the next **six (6) months**, do you plan to leave or travel from the United States or Canada?	○ Yes ◉ No	○ Yes ○ No
Lifestyle Information	Proposed Insured 1	Proposed Insured 2
c. In the last **three (3) years**, have you engaged in any of the following? *(If yes, select all that apply.)*	○ Yes ◉ No	○ Yes ○ No
• Aviation (other than as a passenger or commercial airline crew)	☐	☐
• Sky diving (more than 1 time), BASE jumping, hang gliding	☐	☐
• Mountain/rock climbing	☐	☐
• SCUBA diving (depths greater than 100 feet)	☐	☐
• Vehicle racing	☐	☐

15 Tobacco Use

	Proposed Insured 1	Proposed Insured 2
a. In the last **three (3) years**, have you used tobacco or other nicotine products in any form?	○ Yes ◉ No	○ Yes ○ No
If yes, please provide month/year last used:	____ / ____ MM YYYY	____ / ____ MM YYYY

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16 Additional Medical Information (If no medical exam is required)

This section is required for all:

- *New business applications when Proposed Insured is age 16 and up and no medical exam is required.*
- *Change of plan applications when the Proposed Insured is age 16 and up.*

Provide a detailed explanation for all "Yes" answers in Explanations, Section 17.

	Proposed Insured 1	Proposed Insured 2
a. In the last **10 years**, have you been diagnosed, treated, or been given advice by a member of the medical profession for any of the conditions listed below? *(If yes, select all that apply.)*	○ Yes ◉ No	○ Yes ○ No
• Attention Deficit Disorder (ADD)/Attention Deficit Hyperactivity Disorder (ADHD)	☐	☐
• Asthma	☐	☐
• Blood Disorder	☐	☐
• Cancer/Tumor	☐	☐
• Chronic Obstructive Pulmonary Disease (COPD)/Emphysema	☐	☐
• Diabetes	☐	☐
• Heart Disease or Disorder	☐	☐
• High Blood Pressure	☐	☐
• Intestinal Disorder	☐	☐
• Liver Disorder	☐	☐
• Mental/Nervous Disorder	☐	☐
• Organ Transplant (other than cornea transplant)	☐	☐
• Sleep Apnea	☐	☐
b. In the last **five (5) years**, have you for any reason not previously explained:		
• Seen a doctor or any member of the medical profession, or been treated at a hospital or other medical facility (*excluding seasonal illnesses such as colds, flu, bronchitis and allergies such as hay fever*)?	○ Yes ◉ No	○ Yes ○ No
• Had medication prescribed other than medications for cold, flu, seasonal allergies or birth control?	○ Yes ◉ No	○ Yes ○ No
c. In the last **10 years**, have you:		
• Used cocaine, marijuana, methamphetamine, or any other controlled substance or narcotic not prescribed by a member of the medical profession?	○ Yes ◉ No	○ Yes ○ No
• Had medical treatment or counseling for use of alcohol or prescribed or non-prescribed drugs?	○ Yes ◉ No	○ Yes ○ No
• Been advised by a member of the medical profession to discontinue use of alcohol or prescribed or non-prescribed drugs?	○ Yes ◉ No	○ Yes ○ No

17 Explanations

If you need more space, please attach additional pages, which will become part of this application. Please note that these must be signed and dated by the Proposed Insured(s) and/or Applicant, and witnessed by Agent.

I have agreed to complete the life insurance application and supporting forms using electronic documents.
JOHN KING has agreed to receive documents and communications electronically.
JOHN KING Primary Beneficiary Name: COLSTON-KING, CHARMAINE
; Preferred Phone Number: 3374996021; Per Stirpes:No
JOHN KING Secondary Beneficiary Name: COLSTON, DWADE
; Preferred Phone Number: 3377945154; Per Stirpes:No

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18 Agreements

Coverage will be effective as of the Policy Date if the following conditions are met: the first premium is paid when this policy is delivered; the Proposed Insureds are living on the delivery date; and, on that delivery date, the information given to the Company is true and complete to the best of the Proposed Insureds' and Applicant's knowledge and belief.

For changes in Basic Amount for a Universal Life Policy or Joint Universal Life, the change will be effective on the Deduction Date on or next following acceptance of the change by the Company if on such Deduction Date the following conditions are met: there is enough Cash Surrender Value to make the required monthly deduction; the Proposed Insureds are all living; and the information given to the Company is true and complete to the best of the Proposed Insureds' and Applicant's knowledge and belief.

However, if a Binding Receipt has been given and is in effect, its terms apply.

All Proposed Insureds and the Applicant state that the information in this Application and any medical history is true and complete to the best of their knowledge and belief. Information is not true and complete to the best of their knowledge and belief if it misrepresents or omits a fact which a Proposed Insured or the Applicant knew or should have known, regardless whether the misrepresentation or omission was intentional. It is agreed that the Company can investigate the truth and completeness of such information while this policy is contestable.

By accepting this Policy, the Owner agrees to the beneficiaries named and corrections made. No change in plan, amount, benefits, or age at issue may be made on the Application unless the Owner agrees in writing. Only an authorized company officer may change the policy provisions. Neither the agent nor a medical examiner may pass on insurability.

Any policy issued on this Application will be owned by Proposed Insured 1 or the Applicant, if other than Proposed Insured 1.

NOTICE: Insurance laws may prohibit the owner of a life insurance policy from entering into any agreement to sell, transfer or assign a life insurance policy prior to the date the policy was issued, or within a period of time specified by state law after the date the policy was issued. The Owner should consult with legal advisors for any questions about these matters.

Any person who knowingly presents a false statement in an application for insurance may be guilty of a criminal offense and subject to penalties under state law.

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LIFE INSURANCE BUYER'S GUIDE

This guide can help you when you shop for life insurance. It discusses how to:

-- Find a Policy That Meets Your Needs and Fits Your Budget

-- Decide How Much Insurance You Need

-- Make Informed Decisions When You Buy a Policy

Prepared by the National Association of Insurance Commissioners

The National Association of Insurance Commissioners is an association of state insurance regulatory officials. This association helps the various insurance departments to coordinate insurance laws for the benefit of all consumers.

This guide does not endorse any company or policy.

Reprinted by
State Farm Life Insurance Company (Not in MA, NY, or WI)
Home Office: Bloomington, Illinois 61710

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IMPORTANT THINGS TO CONSIDER

1. Review your own insurance needs and circumstances. Choose the kind of policy that has benefits that most closely fit your needs. Ask an agent or company to help you.
2. Be sure that you can handle premium payments. Can you afford the initial premium? If the premium increases later and you still need insurance, can you still afford it?
3. Don't sign an insurance application until you review it carefully to be sure all the answers are complete and accurate.
4. Don't buy life insurance unless you intend to stick with your plan. It may be very costly if you quit during the early years of the policy.
5. Don't drop one policy and buy another without a thorough study of the new policy and the one you have now. Replacing your insurance **may be costly**.
6. Read your policy carefully. Ask your agent or company about anything that is not clear to you.
7. Review your life insurance program with your agent or company every few years to keep up with changes in your income and your needs.

Buying Life Insurance

When you buy life insurance, you want coverage that fits your needs.

First, decide how much you need--and for how long--and what you can afford to pay. Keep in mind the major reason you buy life insurance is to cover the financial effects of unexpected or untimely death. Life insurance can also be one of many ways you plan for the future.

Next, learn what kinds of policies will meet your needs and pick the one that best suits you.

Then, choose the combination of policy premium and benefits that emphasizes protection in case of early death, or benefits in case of long life, or a combination of both.

It makes good sense to ask a life insurance agent or company to help you. An agent can help you review your insurance needs and give you information about the available policies. If one kind of policy doesn't seem to fit your needs, ask about others.

This guide provides only basic information. You can get more facts from a life insurance agent or company or from your public library.

What About the Policy You Have Now?

If you are thinking about dropping a life insurance policy, here are some things you should consider:

-- If you decide to replace your policy, don't cancel your old policy until you have received the new one. You then have a minimum period to review your new policy and decide if it is what you wanted.

-- It may be costly to replace a policy. Much of what you paid in the early years of the policy you have now, paid for the company's cost of selling and issuing the policy. You may pay this type of cost again if you buy a new policy.

-- Ask your tax advisor if dropping your policy could affect your income taxes.

-- If you are older or your health has changed, premiums for the new policy will often be higher. You will not be able to buy a new policy if you are not insurable.

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-- You may have valuable rights and benefits in the policy you now have that are not in the new one.

-- If the policy you have now no longer meets your needs, you may not have to replace it. You might be able to change your policy or add to it to get the coverage or benefits you now want.

-- At least in the beginning, a policy may pay no benefits for some causes of death covered in the policy you have now.

In all cases, if you are thinking of buying a new policy, check with the agent or company that issued you the one you have now. When you bought your old policy, you may have seen an illustration of the benefits of your policy. Before replacing your policy, ask your agent or company for an updated illustration. Check to see how the policy has performed and what you might expect in the future, based on the amounts the company is paying now.

How Much Do You Need?

Here are some questions to ask yourself:

-- How much of the family income do I provide? If I were to die early, how would my survivors, especially my children, get by? Does anyone else depend on me financially, such as a parent, grandparent, brother or sister?

-- Do I have children for whom I'd like to set aside money to finish their education in the event of my death?

-- How will my family pay final expenses and repay debts after my death?

-- Do I have family members or organizations to whom I would like to leave money?

-- Will there be estate taxes to pay after my death?

-- How will inflation affect future needs?

As you figure out what you have to meet these needs, count the life insurance you have now, including any group insurance where you work or veteran's insurance. Don't forget Social Security and pension plan survivor's benefits. Add other assets you have: savings, investments, real estate and personal property. Which assets would your family sell or cash in to pay expenses after your death?

What is the Right Kind of Life Insurance?

All policies are not the same. Some give coverage for your lifetime and others cover you for a specific number of years. Some build up cash values and others do not. Some policies combine different kinds of insurance, and others let you change from one kind of insurance to another. Some policies may offer other benefits while you are still living. Your choice should be based on your needs and what you can afford.

There are two basic types of life insurance: **term insurance** and **cash value insurance.** Term insurance generally has lower premiums in the early years, but does not build up cash values that you can use in the future. You may combine cash value life insurance with term insurance for the period of your greatest need for life insurance to replace income.

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Term Insurance covers you for a term of one or more years. It pays a death benefit only if you die in that term. Term insurance generally offers the largest insurance protection for your premium dollar. It generally does not build up cash value.

You can renew most term insurance policies for one or more terms even if your health has changed. Each time you renew the policy for a new term, premiums may be higher. Ask what the premiums will be if you continue to renew the policy. Also ask if you will lose the right to renew the policy at some age. For a higher premium, some companies will give you the right to keep the policy in force for a guaranteed period at the same price each year. At the end of that time you may need to pass a physical examination to continue coverage, and premiums may increase.

You may be able to trade many term insurance policies for a cash value policy during a conversion period--even if you are not in good health. Premiums for the new policy will be higher than you have been paying for the term insurance.

Cash Value Life Insurance is a type of insurance where the premiums charged are higher at the beginning than they would be for the same amount of term insurance. The part of the premium that is not used for the cost of insurance is invested by the company and builds up a cash value that may be used in a variety of ways. You may borrow against a policy's cash value by taking a policy loan. If you don't pay back the loan and the interest on it, the amount you owe will be subtracted from the benefits when you die, or from the cash value if you stop paying premiums and take out the remaining cash value. You can also use your cash value to keep insurance protection for a limited time or to buy a reduced amount without having to pay more premiums. You also can use the cash value to increase your income in retirement or to help pay for needs such as a child's tuition without canceling the policy. However, to build up this cash value, you must pay higher premiums in the earlier years of the policy. Cash value life insurance may be one of several types; whole life, universal life and variable life are all types of cash value insurance.

Whole Life Insurance covers you for as long as you live if your premiums are paid. You generally pay the same amount in premiums for as long as you live. When you first take out the policy, premiums can be several times higher than you would pay initially for the same amount of term insurance. But they are smaller than the premiums you would eventually pay if you were to keep renewing a term policy until your later years.

Some whole life policies let you pay premiums for a shorter period such as 20 years, or until age 65. Premiums for these policies are higher since the premium payments are made during a shorter period.

Universal Life Insurance is a kind of flexible policy that lets you vary your premium payments. You can also adjust the face amount of your coverage. Increases may require proof that you qualify for the new death benefit. The premiums you pay (less expense charges) go into a policy account that earns interest. Charges are deducted from the account. If your yearly premium payment plus the interest your account earns is less than the charges, your account value will become lower. If it keeps dropping, eventually your coverage will end. To prevent that, you may need to start making premium payments, or increase your premium payments, or lower your death benefits. Even if there is enough in your account to pay the premiums, continuing to pay premiums yourself means that you build up more cash value.

Variable Life Insurance is a kind of insurance where the death benefits and cash values depend on the investment performance of one or more separate accounts, which may be invested in mutual funds or other investments allowed under the policy. Be sure to get the prospectus from the company when buying this kind of policy and STUDY IT CAREFULLY. You will have higher death benefits and cash value if the underlying investments do well. Your benefits and cash value will be lower or may disappear if the investments you chose didn't do as well as you expected. You may pay an extra premium for a guaranteed death benefit.

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Life Insurance Illustrations

You may be thinking of buying a policy where cash values, death benefits, dividends or premiums may vary based on events or situations the company does not guarantee (such as interest rates). If so, you may get an illustration from the agent or company that helps explain how the policy works. The illustration will show how the benefits that are not guaranteed will change as interest rates and other factors change. The illustration will show you what the company guarantees. It will also show you what **could** happen in the future. Remember that nobody knows what will happen in the future. You should be ready to adjust your financial plans if the cash value doesn't increase as quickly as shown in the illustration. You will be asked to sign a statement that says you understand that some of the numbers in the illustration are not guaranteed.

Finding a Good Value in Life Insurance

After you have decided which kind of life insurance is best for you, compare similar policies from different companies to find which one is likely to give you the best value for your money. A simple comparison of the premiums is not enough. There are other things to consider. For example:

-- Do premiums or benefits vary from year to year?

-- How much do the benefits build up in the policy?

-- What part of the premiums or benefits is not guaranteed?

-- What is the effect of interest on money paid and received at different times on the policy?

Remember that no one company offers the lowest cost at **all** ages for **all** kinds and amounts of insurance. You should also consider other factors:

-- How quickly does the cash value grow? Some policies have low cash values in the early years that build quickly later on. Other policies have a more level cash value build-up. A year-by-year display of values and benefits can be very helpful. (The agent or company will give you a policy summary or an illustration that will show benefits and premiums for selected years.)

-- Are there special policy features that particularly suit your needs?

-- How are nonguaranteed values calculated? For example, interest rates are important in determining policy returns. In some companies increases reflect the average interest earnings on all of that company's policies regardless of when issued. In others, the return for policies issued in a recent year, or a group of years, reflects the interest earnings on that group of policies; in this case, amounts paid are likely to change more rapidly when interest rates change.

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STATE FARM LIFE INSURANCE COMPANY

Summary of the Louisiana Life and Health Insurance Guaranty Association Act and Notice Concerning Coverage Limitations and Exclusions

Residents of Louisiana who purchase life insurance, annuities, or health insurance should know that the insurance companies licensed in this state to write these types of insurance are required by law to be members of LLHIGA. The purpose of LLHIGA is to assure that policyholders will be protected, within limits, in the unlikely event that a member insurer becomes financially unable to meet its obligations. If this happens, LLHIGA will assess its other member insurance companies for the money to pay the covered claims of insured persons who live in this state and, in some cases, to keep coverage in force. However, the valuable extra protection provided by these insurers through LLHIGA is limited. As noted in the disclaimer below, this protection is not a substitute for consumers' care in selecting companies that are well-managed and financially stable.
Except as provided in R.S. 22:2098(D), when an insurer delivers a policy or contract described in R.S. 22:083(B)(1), then prior to or at the time of delivery, the disclaimer notice described in R.S. 22:2098(C) and approved by the commissioner, shall be given separately to the policy or contract holder.

Disclaimer

The Louisiana Life and Health Insurance Guaranty Association provides coverage of claims under some types of policies if the insurer becomes impaired or insolvent. *COVERAGE MAY NOT BE AVAILABLE FOR YOUR POLICY.* Even if coverage is provided, there are significant limits and exclusions. Coverage is generally conditioned upon residence in this state. Other conditions may also preclude coverage.
Insurance companies and insurance agents are prohibited by law from using the existence of the association or its coverage to sell you an insurance policy.
You should not rely on availability of coverage under the Louisiana Life and Health Insurance Guaranty Association when selecting an insurer.
The Louisiana Life and Health Insurance Guaranty Association or the Department of Insurance will respond to any questions you may have which are not answered by this document.

LLHIGA
PO Drawer 44126
Baton Rouge, Louisiana 70804

Department of Insurance
PO Box 94214
Baton Rouge, Louisiana 70804-9214

The state law that provides for this safety-net coverage is called the Louisiana Life and Health Insurance Guaranty Association Law (the law), and is set forth at R.S. 22:2081 et seq. The following is a brief summary of this law's coverages, exclusions and limits. This summary does not cover all provisions of the law; nor does it in any way change any person's rights or obligations under the law or the rights or obligations of LLHIGA.

COVERAGE

Generally, individuals will be protected by the Life and Health Insurance Guaranty Association if they live in this state and hold direct non-group life, health, or annuity policy or contract, a certificate under a direct group policy or contract for a supplemental contract to any of these, or an unallocated annuity contract, issued by an insurer authorized to conduct business in Louisiana. The beneficiaries, payees, or assignees of insured persons may also be protected as well even if they live in another state unless they are afforded coverage by the guaranty association of another state, or other circumstances described under the law are applicable.

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EXCLUSIONS FROM COVERAGE

A person who holds a direct non-group life, health, or annuity policy or contract, a certificate under a direct group policy or contract for a supplemental contract to any of these, or an unallocated annuity contract is not protected by LLHIGA if:

(1) they are eligible for protection under the laws of another state (This may occur when the insolvent insurer was incorporated in another state whose guaranty association protects insureds who live outside that state.);
(2) the insurer was not authorized to do business in this state;
(3) their policy was issued by a nonprofit hospital or medical service organization, an HMO, a fraternal benefit society, a mandatory state pooling plan, a mutual assessment company or similar plan in which the policyholder is subject to future assessments, an insurance exchange, an organization that issues charitable gift annuities as is defined in R.S. 22:952(A)(3), or any entity similar to any of these.

LLHIGA also does not provide coverage for:

(1) any policy or portion of a policy which is not guaranteed by the insurer or for which the individual has assumed the risk, such as a variable contract sold by prospectus;
(2) any policy of reinsurance (unless an assumption certificate was issued);
(3) interest rate or crediting rate yields, or similar factors employed in calculating changes in value, that exceed an average rate;
(4) dividends, premium refunds, or similar fees or allowances described under the Law;
(5) credits given in connection with the administration of a policy by a group contract holder;
(6) employers', associations' or similar entities' plans to the extent they are self-funded (that is, not insured by an insurance company, even if an insurance company administers them) or uninsured;
(7) unallocated annuity contracts (which give rights to group contract holders, not individuals), except unallocated annuity contracts and defined contribution government plans qualified under section 403(b) of the United States *Internal Revenue code* (26 U.S.C. Section 403(b)).
(8) an obligation that does not arise under the express written terms of the policy or contract issued by the insurer to the policy owner or contract owner, including but not limited to, claims described under the law;
(9) A policy or contract providing any hospital, medical, prescription drug or other health care benefits pursuant to "Medicare Part C coverage" or "Medicare Part D coverage" and any regulations issued pursuant to those parts;
(10) Interest or other changes in value to be determined by the use of an index or other external references but which have not been credited to the policy or contract or as to which the policy or contract owner's rights are subject to forfeiture, as of the date the member insurer becomes an impaired or insolvent insurer, whichever is earlier.

LIMITS ON AMOUNTS OF COVERAGE

The Louisiana Life and Health Insurance Guaranty Association Law also limits the amount that LLHIGA is obligated to pay out. The benefits for which LLHIGA may become liable shall in no event exceed the lesser of the following:

- For any one insured life, regardless of the number of policies or contracts there are with the same company, LLHIGA will pay a maximum of $300,000 in life insurance death benefits, but not more than $100,000 in net cash surrender and net cash withdrawal values for life insurance.
- LLHIGA cannot pay more than what the insurance company would owe under a policy or contract if it were not an impaired or an insolvent insurer.
- For any one insured life, regardless of the number of policies or contracts there are with the same company, LLHIGA will pay a maximum of $500,000 in health insurance benefits, and LLHIGA will pay a maximum of $250,000 in present value of annuities, including net cash surrender and net cash withdrawal values.

In no event, regardless of the number of policies and contracts there were with the same company, and no matter how many different types of coverages, LLHIGA shall not be liable to expend more than $500,000 in the aggregate with respect to any one individual.

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IMPORTANT TAX INFORMATION CONCERNING YOUR LIFE INSURANCE POLICY

Money that is deemed removed ("distributed") from or grows within some life insurance policies may be taxed. The following briefly describes examples of how this could occur. Your tax advisor must determine the taxation of your specific situation.

What is a "distribution" from the policy?

The term distribution is used in the tax laws to describe the deemed withdrawal of values from the policy. Typical withdrawals include: withdrawals of cash value, loans, assignments of contract values to another person, or crediting of a dividend, unless it is used to purchase additional insurance or to pay a premium.

How are policies normally taxed?

Generally, death benefits are not subject to income tax. Values inside the policy grow tax-free. Loans are tax-free until you surrender the policy or allow it to lapse. Other distributions are tax-free until all premiums are returned, and distributions above that amount are taxed as "gain."

What is "gain"?

Gain simply means your policy has a larger value than the total amount of premiums you have paid, net of some amounts such as premiums that have been returned through dividends. The gain is the difference between the value of your policy and the premiums paid. For example, if a policy has a value of $1,000.00 and premiums of $800.00 have been paid, the gain is $200.00. It is only the $200.00 gain that would be subject to tax.

When might my policy be taxed differently?

Certain actions that you take may result in various situations where your policy may be taxed differently, including but not limited to the following:

- -- Pay premium above the limits specified in the tax laws
- -- Change the amount of insurance, including paid-up additions, such as through partial withdrawals
- -- Add, cancel, or change rider coverage or amounts

Also certain distributions are taxable - but only to the extent of the gain in your policy. Any gain is considered to be the first - rather than the last - amount withdrawn; so, any distribution is taxed until the amount of the gain is reached. After that, the remainder of the distribution is not taxed.

If the distribution occurs before age 59$^{1}/_{2}$, the IRS may impose a 10% additional tax on the amount of the distribution that is taxable.

In extreme situations, the policy may be disqualified as "life insurance" for tax purposes. That means the policy's internal cash value growth could be taxable.

How will I know for certain how my policy is taxed?

Prior to taking actions such as those listed above, you may wish to contact your tax advisor to find out for certain how your policy will be taxed. In some cases the tax consequences of these actions may be irreversible.

Policyholder Information Service

State Farm Life Insurance Company
Home Office:
Bloomington, Illinois 61710-0001

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-0147277

STATE FARM LIFE INSURANCE COMPANY

POLICY DELIVERY RECEIPT

I acknowledge receiving my policy on the date shown below.

POLICY # [redacted] OWNER JOHN-CLIFFORD JOSEPH KING, SR

DATE _____ SIGNATURE OF OWNER _____

AGENT: After having both copies of the form signed, give one to the Owner and send one to State Farm.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-0147277

STATE FARM LIFE INSURANCE COMPANY

POLICY DELIVERY RECEIPT

I acknowledge receiving my policy on the date shown below.

POLICY # [redacted] OWNER JOHN-CLIFFORD JOSEPH KING, SR

DATE _____ SIGNATURE OF OWNER _____

AGENT: After having both copies of the form signed, give one to the Owner and send one to State Farm.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21 - 0 147277

StateFarm®

Social Security Number (SSN) or Taxpayer Identification Number (TIN) Certification – Substitute W-9

Applicant — By signing this application, I certify under penalties of perjury that
(1) The Social Security Number/TIN shown above is correct, and
(2) I am a U.S. citizen or other U.S. person (defined below), and
(3) Backup Withholding:
- ◉ I am not subject to backup withholding either because I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of failure to report all interest or dividends, or the IRS has notified me that I am no longer subject to backup withholding or I am exempt from backup withholding.
- ○ I am subject to backup withholding.

(4) I am exempt from reporting under the Foreign Account Tax Compliance Act (FATCA) with respect to the account(s) for which this form has been requested because I hold or otherwise maintain the account(s) in the United States.

Definition of U.S. person. For federal tax purposes, you are considered a U.S. person if you are:
- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding. For instructions on how to complete the form, visit the IRS website at www.irs.gov or contact your local IRS office.

DocuSigned by:
[signature]
Proposed Insured 1 Signature (Signature not required for juvenile application) — 11/16/2018 Date (MM/DD/YYYY) — SIGNATURE

Proposed Insured 2 Signature — Date (MM/DD/YYYY) — SIGNATURE

Applicant Signature — Date (MM/DD/YYYY) — SIGNATURE

Applicant's signature is not required unless Applicant is other than Proposed Insured 1. If a firm or corporation is to be the policyowner, please provide company name and signature of an authorized officer.

DocuSigned by:
Jennifer Ambrose
Agent/Licensed Insurance Producer Signature — 11/19/2018 Date (MM/DD/YYYY) — SIGNATURE

At Lake Charles City — LA State

ICC16 1004522 LF-3805-9195 1006730 2002 144512 202 02-10-2016

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21 - 0147277

BASIC PLAN DESCRIPTION

Whole life insurance with premiums payable to the Policy Anniversary shown under Premiums Payable on page 3 while the Insured is alive. Insurance is payable when the Insured dies. The Basic Plan is eligible for Annual Dividends.

4. State Farm - King Email

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

John C. J. King Sr. Sr.

[redacted]

Tried calling [redacted]
2/11/22
12.20

Don Harris of State Farm Insurance

1614 Gerstner Memorial Dr,

Lake Charles, LA, 70601

Good afternoon Mr. Harris

We have been in communication with your office since late May 2021 expressing concerns about my "policies". I have sent you the beneficiary change form via email and I have not received a confirmation of the change, nor have I received the requested copy of the original beneficiary form was used to make Dwade and Charmaine Colston my beneficiaries. I was reissued a policy back to me, but the problem still exists that someone who is not my spouse and does not have insurable interest in me STILL has an active spousal policy on me. I see your email is no longer working so I send this letter in a last attempt to get you to send me the original copies of all policies and beneficiary forms that have been submitted that were promised. The delay is no longer acceptable nor appreciated. I am making this request in good faith. I need a response within the next 7 business days from the receipt of this letter.

Thank you for your attention to this matter.

John C. J. King Sr.

02-04-2022

21-0147277

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Gmail John King <johncjking86@gmail.con

OLLOW UP

messages

on Harris <don.harris.b254@statefarm.com> Thu, Dec 2, 2021 at 9:51 A
[redacted]

Good morning John, this is just a courtesy follow-up on your previous request. As per your request, your policy address of record was changed to [redacted] Also, as per your request, the billing was taken out of the monthly account of Charmaine Colston. It is currently paid to November 16, 2021. In addition, I have not heard from you on the change of beneficiary form that I forwarded to you last month. If you would like for me to transfer your policy to an agent who is closer to you, please let me know and I will get your records to that agent which may improve the servicing of your business.

Please let me know if you have any questions and I hope you have a Merry Christmas.

---

ohn King [redacted] Sat, Dec 11, 2021 at 7:32 P
: Don Harris <don.harris.b254@statefarm.com>

Why does it say I owe that amount?
What happened to the cash value that was in the policy?
I still don't have viewing access to the policy.
I am not receiving billing statements for my seperated policy.
I need the original form that designated charmaine as my primary and dwade as my secondary beneficiary.
I want to put the policy premium on a monthly draft.
[Quoted text hidden]
--

J.C.J. King

---

2 attachments

Change of Beneficiary (2).pdf
3446K

State Farm (3).pdf
275K

---

hn King [redacted] Mon, Jan 3, 2022 at 6:57 P
: Don Harris <don.harris.b254@statefarm.com>

Hey Don Happy New Year and I hope all is well with you. I'm sending this email as a follow up from when we last spoke. I asked for the original beneficiary forms on my policy and you stated you would get those to me. I still have not received them and If there is anything I can do to help speed up this process please let me know.

[Quoted text hidden]
--

J.C.J. King

---

ail Delivery Subsystem <mailer-daemon@googlemail.com> Mon, Jan 3, 2022 at 6:57 P
[redacted]n

Address not found

21-0147277

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Gmail John King <johncjking86@gmail.co

:OLLOW UP

messages

)on Harris <don.harris.b254@statefarm.com> Thu, Dec 2, 2021 at 9:51 /
o: [redacted]

Good morning John, this is just a courtesy follow-up on your previous request. As per your request, your policy address of record was changed to 123 N LOUISIANA AVE , Lake Charles, La 70601. Also, as per your request, the billing was taken out of the monthly account of Charmaine Colston. It is currently paid to November 16, 2021. In addition, I have not heard from you on the change of beneficiary form that I forwarded to you last month. If you would like for me to transfer your policy to an agent who is closer to you, please let me know and I will get your records to that agent which may improve the servicing of your business.

Please let me know if you have any questions and I hope you have a Merry Christmas.

---

ohn King [redacted] Sat, Dec 11, 2021 at 7:32 I
o: Don Harris <don.harris.b254@statefarm.com>

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[Quoted text hidden]
--
J.C.J. King

2 attachments

Change of Beneficiary (2).pdf
3446K

State Farm (3).pdf
275K

---

ohn King [redacted] Mon, Jan 3, 2022 at 6:57 I
o: Don Harris <don.harris.b254@statefarm.com>

Hey Don Happy New Year and I hope all is well with you. I'm sending this email as a follow up from when we last spoke. I asked for the original beneficiary forms on my policy and you stated you would get those to me. I still have not received them and If there is anything I can do to help speed up this process please let me know.

[Quoted text hidden]
--
J.C.J. King

---

lail Delivery Subsystem <mailer-daemon@googlemail.com> Mon, Jan 3, 2022 at 6:57 I
o: johncjking86@gmail.com

Address not found

21-0147277



the address couldn't be found, or is unable to receive mail.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

The response from the remote server was:

```
550 5.1.1 User Unknown
```

Final-Recipient: rfc822; don.harris.b254@statefarm.com
Action: failed
Status: 5.1.1
Remote-MTA: dns; mxb-00104b02.gslb.pphosted.com. (205.220.177.182, the server for the domain statefarm.com.)
Diagnostic-Code: smtp; 550 5.1.1 User Unknown
Last-Attempt-Date: Mon, 03 Jan 2022 15:57:33 -0800 (PST)

---------- Forwarded message ---------
From: John King <[redacted]>
To: Don Harris <don.harris.b254@statefarm.com>
Cc:
Bcc:
Date: Mon, 3 Jan 2022 18:57:22 -0500
Subject: Re: FOLLOW UP
----- Message truncated -----

21-0147277

5. King Email Statement

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-147277

Kent Castille

From: John King [redacted]
Sent: Wednesday, April 20, 2022 7:30 AM
To: Kent Castille
Subject: Insurance timeline [EXT]

External Email: This message does NOT originate from the CPSO network. Do not click links or open attachments unless you know the content is safe. Report suspicious messages to CIS immediately. (mail-ua1-f44.google.com - United States)

05/28/2021- I contacted state farm national to inquire about the cash value of my existing whole life policy that i had issued in 2018 to aid in increasing my face value. At this time I was told that my policy no longer existed and the ownership had been changed.

06/03/2021- I contacted the Starm Farm Field Agency of Don Harris 1614 HWY 14 Lake Charles, LA 70601 Phone number 337-439-2747, Noone responded initially to phone calls so I sent an urgent fax in writing to Don Harris office. He returned my call to let me know that not only had my whole life policy that I owned since 2018 been transferred without authorization to my ex girlfriend, but the ex girlfriend (Charmaine Y Colston) also removed my mother and brother as beneficiaries and committed fraud and identity theft.

> Ms Colston did not have my permission to change any beneficiaries

> Ms.. Colston is not nor has she ever been my wife, and she misrepresented herself as my wife and Ms Jennifer Ambrose asked for no proof of Marriage.

- He told me that I should review the statements for more information but he remembered clearly when she came into the office to change my beneficiary on my policy while I was not present.

- Jennifer Ambrose proceeded to illegally and without cause illegally transfer the exisiting policy from 2018 that I owned and rolled the cash value into TWO entire new policies owned completely by my ex girlfriend Charmaine Y Colston. I was deceived, and taken advantage of. I was assured my mother and brother would continue to be the beneficiaries, they proceeded to conspire with Charmaine Colston behind my back to change the beneficiaries to Ms Colston using a forged signature.
- Jennifer Ambrose then proceeded to underwrite an additional "spousal" policy for a woman that was not and never has been my spouse. She did not ask for a marriage certificate or evidence that we were legally married. Charmaine Colston contacted me and said that my policy from 2018 needed to be increased to have more insurance coverage should i pass my children would be covered. I was out of state at the time in Texas which legally did not permit any underwriting of new policies because I was a Texas resident at the time, however Ms Colston, sided by Jennifer Ambrose proceeded to fraudulently steal the cash value in my existing policy by transferring it into new policies owned by Charmaine Colston. These new policies from July 2020 were to be owned ENTIRELY by Charmaine Y Colston and face value after the riders added would total over $650,000.00 in face value for which she was the SOLE beneficiary.
- This was achieved using the following lies during the policies underwriting for which the agent received a large commission and Charmaine Colston successfully achieved investment securities ownership of the cash surrendered value of my policy form 2018, but also without written evidence of insurable interest of any sort take on full ownership of all of my policies held at State Farm.
- Ms.Colston represented herself as "spouse" on the insurance application, and additionally proceeded to sign her name as Charmaine Colston King and stated on the application that her relationship to me was "spouse" in writing. Without evidence.
- Ms. Colston proceeded once again to fraudulently forge my signature on the application which violates the truth in underwriting act. MS. Colston took unauthorized use of my home computer while I lived in Texas to break into my email account and forge my name to the policy documents.

06/04/21

- Jennifer Ambrose was made aware of the error and I demanded the policy be cancelled, Jennifer then risked my life and safety to contact Ms Colston who proceeded to threaten me saying I was dead, a walking dead man, she was going to blow my brains out and admitted in writing to fraudulently changing the beneficiaries by forgery, and also in writing stated that she had in fact lied to obtain the policies, she did not regret it, and she would soon "end me" and for me to wait and see. Ms. Colston also refused to cancel the policy after I told her it would never pay out as she was not my spouse and had lied in underwriting.

- Important to note that there are many restraining orders against Ms Colston in multiple states for threats against my life, safety, and my career. There are criminal charges and evidence that she has committed fraud at multiple financial institutions across the state of Louisiana by assuming my identity falsely to transfer financial assets and my personally owned property into her ownership. The Calcasieu Parish District Attorney has charges pending as well as multiple cases in the states of New York and New Jersey.
_ I have written evidence of all facts on the timeline above and I am demanding that ALL policies issued to Charmaine Colston be cancelled immediately as I will be seeking to recover damages, and criminal charges.
- I am demanding that immediately State Farm reinstate my whole life policy and restore my previous guaranteed insurability to my 2018 rates, I am also demanding that my face value be increased and reissued in a policy face value equal or greater
- I am demanding that Ms Colstons criminal behavior be punished and any one who neglected their duty of due diligence be reprimanded.
- I am demanding that financial damages and restitution be paid for my losses. The financial loss of insurability, the time value of my investment dollars as I was paying $350 + dollars into a policy that I was told was owned solely by I John King Sr. (Why would I pay a premium that big for which the bulk of the premium went into a policy owned by Charmaine Colston, I was never aware that she owned a policy on me, I never authorized it, and I had no clue Ms. Colston owned a policy.
I am demanding that all policies owned by Charmaine Y Colston be cancelled on or before October 25, 2021 and that I receive formal notice of the cancellation.
- I demand continuing education for Jennifer Ambrose as she unknowingly put my life in danger by issuing a policy to a woman who suffers from mental illness, has defrauded other banks and financial institutions by way of forgery of my name and I in turn have had to endure months of mental abuse, harassment, death threats and torture which has caused high blood pressure and a host of medical issues that I will now battle foe the entirety of my life.

I am demanding a full and thorough investigation which will verify what I assert above is that Jennifer Ambrose did not perform the necessary and proper due diligence in underwriting. She did not obtain proper identification and marriage license.

--
J.C.J. King

6. State Farm Subpoena

Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-147277

SUBPOENA NOTICE

TO: STATE FARM INS CO/THRU CORP SERVICE CO
CUSTODIAN OF RECORDS FAXING

14th Judicial District Court
Parish of Calcasieu
State of Louisiana

RE: A MATTER UNDER AN ACTIVE INVESTIGATION
Under Clerk file number: **1168-MIS-2022**

YOU ARE HEREBY NOTIFIED:
To release the following records upon receipt

See Attached Motion and Order

All in accordance with a certified copy attached hereto and made part here of.

SUBPOENAED BY: DET. KENT CASTILLE, CPSO

Witness the Honorable, Judges of said court at Lake Charles, LA, this 21ST day of APRIL, 2022.

Issued and delivered APRIL 21ST , 2022.

Sheila Funderburk

SHEILA FUNDERBURK
Deputy Clerk of Court

SERVICE INFORMATION

RECEIVED on the _____ day of _____, 20_____ and on the _____ day of_____, 20_____ served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:
PARISH OF _____ this _____ day of _____, 20____

By:_____
Deputy Sheriff

Doc ID: *CS047884890001* Case#: 1168-MIS-2022
Docket Date: 4/21/2022 12:00:00 AM Pages: 1
SUBPOENA FOR FAX ISSUED TO

[TRUE COPY]

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

THE DISTRICT ATTORNEY OF
THE PARISH OF CALCASIEU

APPLYING FOR A SUBPOENA
TO OBTAIN INFORMATION
NEEDED IN AN ACTIVE
INVESTIGATION BY THE
CALCASIEU PARISH
SHERIFF'S OFFICE

FILED: APR 21 2022

14TH JUDICIAL DISTRICT COURT

STATE OF LOUISIANA

PARISH OF CALCASIEU

DEPUTY CLERK

MOTION AND ORDER FOR SUBPOENA DUCES TECUM

NOW INTO COURT, comes the State of Louisiana through Stephen Dwight, District Attorney, represented herein by the undersigned Assistant District Attorney, who respectfully represents to the Court that:

1.

The Calcasieu Parish Sheriff's Office is currently investigating criminal activity (Case 2021-00147277) in reference to a Forgery. The victim stated he observed numerous changes and unauthorized policies created under his identity through State Farm Insurance Company. The victim stated he did not consent to the creation nor authorize any individual or State Farm employee to transfer the policies that he created to the subject's State Farm account. State Farm employees stated that an internal investigation had been conducted and is currently being requested.

2.

In order to complete said investigation it is necessary to obtain ANY and ALL information associated with the State Farm Insurance Company records associated with the complaint and fraud report/investigation concerning John Clifford King (Social Security Number [redacted] full number available upon request) who is a customer of State Farm Don Harris branch within Lake Charles, LA, to include but not be limited to the full fraudulent investigation conducted by State Farm Insurance Company with all documents, notes, statements, and investigation conclusion.

3.

State Farm Insurance Company, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802, has indicated that the requested information cannot be released without a subpoena ordering them to do so.

4.

Said subpoena is proper under R.S. 6:333(F)(13)

CONSIDERING THE FOREGOING:

IT IS ORDERED that a Subpoena Duces Tecum issued to State Farm Insurance Company, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802, provide ANY and ALL information associated with the complaint and fraud report/investigation concerning John Clifford King (Social Security Number [redacted] full number available upon request) who is a customer of State Farm Don Harris branch within Lake Charles, LA, to include but not be limited to the full fraudulent investigation conducted by State Farm Insurance Company with all documents, notes, statements, and investigation conclusion.

Said records are to be made available to Detective Kent Castille of the Calcasieu Parish Sheriff's Office preferably electronically by email to FinancialRecords@cpso.com or by mail to 5400 East Broad Street, Lake Charles, LA, 70615 no later than May 30, 2022. Detective Castille can be reach by either email or phone (337) 431-8094.

THIS DONE AND SIGNED in Chambers this 21 day of April 2022

District Judge

Assistant District Attorney

30507

Bar Roll Number

A TRUE COPY
Lake Charles, Louisiana

Deputy Clerk of Court
Calcasieu Parish, Louisiana

APR 21 2022

7. Colston Email Statement

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Kent Castille

From: charmaine colston [redacted]
Sent: Wednesday, May 4, 2022 2:29 PM
To: Kent Castille
Subject: Case # 2021-00147277

This Message Is From an External Sender
This message came from outside your organization.

Detective Castille,

Below is my, Charmaine Y. Colston, statement for the referenced case.

John King, Sr. (4/17/1986) and I were together since December 2006. We had our first child together in September 2008.

Spring 2012, John King, Sr. proposed to me.

2017, we got a life Insurance policy. I am the policy holder and John is a rider on the policy.

November 2018, we had our third child together. After our third child, John and I discussed increasing our life insurance policy.

We did so between 2019-2020, I do not remember the exact date. Mine was increased and his was increased.

John spoke with the insurance company , he answered health questions and he did lab-work. All correspondence regarding authorizing the policy being increased was done between John and the insurance company. He had to approve it/sign and he did.

After hurricane Laura in 2020, John left for " temporary work " in NJ November 2020.

John contacted me June 2021 via email and phone (please see attached); stating he hired an estate planner and they contacted State Farm; He said he was upset to know after all this time he had been working in the plant, if he died the policy would not pay out, due to an error with the name on the policy. He said he was pissed off because the plant blew up before and had he died , the children would not be taken care of.

Today, 5/4/2022, I was informed by Kallie S. (examiner of the file/case) with the Louisiana Insurance Commissioner's office that John contacted them in October 2021 attempting to change the policy; he was told he could not without the policy holder (Charmaine Y. Colston) consent. The file was closed November 2021. Kallie S. also advised John did not contact them to make a complaint against me.

Kallie S. Contact number is 1-800-259-5300. She is in the consumer service/complaint department.

John never stated the policy was forged nor that he didn't want it.

Without being left unsaid, It is highly believed John has gone to these extreme measures to falsify police reports to have the policy , he consented to/ and had knowledge of almost two/three years ago, canceled due to his influence and relationship with his now girlfriend.

Please note: I also would like to file a report for defamation of character and John King filing False Police Reports.

Truthfully Submitted,
Charmaine Y. Colston

8. Ambrose Statement

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-147277

02/26/2022

Regarding Mr. John King Clifford claim regarding theft and fraud.

Charmaine Colston came to the office inquiring about life insurance. I ask her if she had any idea what amount they wanted to look at, she asks for quotes. I give her several quotes for her and John to look at. Charmaine stated she would get back with me when they decided the amount. It was several weeks later before she called and stated the amount, they agreed on which was 300,000 20-term on her and 500,000 20yr term on him.

Charmaine explained due to John's work schedule it would hard for him to come in the office to complete the application. I explained to her that I could take both application over the phone and email the application, and they would be able to sign through E-doc. I called spoke with John ask him all the questions, he agreed upon the amount he sign, and the same with Charmaine. The application was emailed back to me, I signed and submitted application to the company. Both John and Charmaine name each other as beneficiary on each other's policies. Policy was forwarded to underwriting they had 30 days to accept or reject policy.

I was informed by the company due to the amount of coverage; John would be schedule to do and exam and answer more questions. The application was turn over to the company, and all company procedures was followed up by the company.

This policy was written on October 6, 2020, and on or around September or October of 2021 I received a call from John's Financial Advisor to cancel the policy. I informed her that because of company procedure I cannot cancel any policy without the owner's permission which is Charmaine. She continues to call demanding that policy be cancel and I continue to explain company procedure. A complaint was filed with Louisiana Insurance Commission and all procedure was found to be followed correctly and no fraud or any misrepresentation was found. This statement is true to the best of my knowledge.

Jennifer Ambrose

9. Harris Statement

April 20. 2022

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-147277

Re: John King

This statement is In regards to John King's claim that our office committed fraud and theft when we wrote the life insurance policies on himself, Charmaine and their children.

I wrote one of his life policies in 2011. It was written at $100,000 on John King as policyowner. His beneficiaries were his mother and his brother. It lapsed due to nonpayment of premium in 2014. I wrote another life policy in 2017 that included Charmaine Colston as owner and John king as an additional rider.

None of the policies I wrote were solicited. John and Charmaine came to our office inquiring about life insurance. The various policies we offered were discussed and explained in detail. They chose the policy that best fit their neeas and affordability. Charmaine and John named their beneficaries. The names of each beneficary and their relationships were recorded and each signature was witnessed by me. The applications were forwarded to our Uderwriting Dept for review, approval and issurance. Once the policies are issued, the policyholder has 30 days to reject or accept the policy. If rejected, a full refund is returned to the customer.

Staff member, Jennifer Ambrose also wrote additional policies on John and Charmaine.

John filed an Ins Dept complaint with the Louisiana Insurance Commissioner claiming that his policy was transferred to Charmaine and that his beneficiries were changed without his consent.

I believe John is confused. His first policy did name his mom and brotheer as beneficiaries and he was the owner but the policy lapsed because the premium was not paid. However, a new policy was written however Charmaine was named primary beneficiary as per John's request.

These policies were underwritten and reviewed by State Farm underwriters and physical examinations were conducted by independent medical vendors. Any discrepancy, misrepresentation and questions are normally addressed during this phase of our underwriting. John had no concerns regarding signatures or beneficiaries at this point.

We are prohibited from making any changes on any policy without the written consent of the policyholder and such changes have to be endorsed and approved by company officials. Copies of any changes are mailed to the customer.

Finally, John's financial advisor called demanding that the policies be cancelled. After receiving

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

John*s approval to discuss his policy with her, we told his advisor that John was not the owner of policies in question and could not cancel them. He then filed an Insurance Dept Complaint with the State of Louisiana which was answered by State Farm and the complaint was closed by the Dept of Insurance after their review of our response.

I urge you to contact State Farm and request a copy of the complaint and our answer which included copies of signed documents by John and Charmaine.

Although I retired on 12/31/2021 and do not have access to company documents, I am available for any questions.

This statement is true to my best recollection.

Don Harris

21-147277

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Lake Charles, Louisiana, May 31, 2022

Court met in Courtroom 'I', His Honor Mitch Redd, Judge presiding, with Ron Castille, Deputy Sheriff; Logan Bertrand, Deputy Clerk of Court; and Jaclyn Istre, Court Reporter, in attendance. **********

2021-002773 JOHN CLIFFORD JOSEPH KING SR
Vs.
CHARMAINE COLSTON

This matter comes before the Court for a Trial on the Merits of various rules filed by the parties, same being regularly fixed.

Present: (Plaintiff)
Scott Hawkins, Esq., Counsel for the Plaintiff; and
John Clifford J. King, Sr., the Defendant.

(Defendant)
Orelia Rachel Lawdins, Esq., Counsel for the Defedant; and
Charmaine Colston, the Defendant.

Following a pretrial conference, joint stipulations are dictated to the Court Reporter and recognized by the Court. Mr. King does not fear for his life due to Ms. Colston. Mr. King is to pay two-thousand five-hundred (2500) dollars in past due child support, Mr. King is to continue paying past accrued arrearages and monthly obligations, and Mr. King is to pay seven-hundred and fifty (750) dollars in attorney's fees within sixty (60) days or face potential incarceration. Both parties are not to communicate about anything outside of the child(ren)'s wellbeing on OurFamilyWizard or face a two-thousand five-hundred (2500) dollar fine. The days and times of visitation are set, transfer of the children is to occur at a safe public location or at a school. The parties can utilize the police to facilitate transfer in the event of an emergency. The harassment injunction remains in full effect. The defendant's motion to vacate is to be granted and the motion to quash is dropped. The plaintiff's motions of contempt are dropped and the subpoenas issued are dropped. Mr. Hawkins reserves the rights to re-issue subpoenas in any future adjudication. All child support payments are to be through Zelle. There has been no insurance fraud on behalf of Ms. Colston. Parties sworn. Parties are questioned and state that they understand and agree to abide by the stipulations. Formal decree to be signed upon presentation by Mr. Hawkins. Further, the Court orders this matter set for status on the trial week of October 31, 2022 at 9:00 AM and this matter is set for a Hearing Officer conference on September 8, 2022 at 1:30 PM. Both parties receive notice in open court of same. For complete colloquy, see Court Reporter's transcript.

Parties Sworn: (Plaintiff)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

John Clifford J. King, Sr.

(Defendant)
Charmaine Colston.

Court adjourned.

Attest: _____ _____
Deputy Clerk of Court DISTRICT JUDGE

OfficerID: CPSOAPPS\ephillips, INITIAL REPORT

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

On December 9, 2021, at approximately 1315 hours, I, Sgt. Elliott Phillips was working the front Administration Desk, when a forgery complaint was being reported. The complainant, stated his ex-girlfriend has been threatening him and also opened a large life insurance policy on him. The complainant was advised a report would be done on the incident and Detectives would be in contact with him.

EOR/NFI
Sgt. Elliott Phillips 12808

CPSO Case, Officer: CPSOAPPS\ephillips, Supervisor: CPSOAPPS\jdansby, Merged By: CPSOAPPS\tcurol

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT CASE# **2021-00147277**

5400 E. Broad St.
Lake Charles, LA 70615

EVENT

REPORTED DATE/TIME	OCCURRED INCIDENT TYPE	
12/9/2021 13:15	Threats	
OCCURRED FROM DATE/TIME	**OCCURRED THRU DATE/TIME**	**LOCATION OF OCCURRENCE**
12/09/2021 13:15	12/09/2021 13:15	123 LOUISIANA AVE LAKE CHARLES, LA

OFFENSES

	STATUTE/DESCRIPTION	COUNTS	ATTEMPT/COMMIT
01	14:38 Simple Assault	1	Completed
02	14:72 Forgery	1	Completed

SUBJECT

JACKET/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE SUFFIX)					
Adult	Suspect	Colston, Charmaine					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted]	32	[redacted]					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black		Female					
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2	PHONE #3			
		[redacted]					

SUBJECT

JACKET/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE SUFFIX)					
Adult	Victim	King, John					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted]	35	[redacted]					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black		Male					
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2	PHONE #3			
[redacted]		[redacted]					

SUBJECT

JACKET/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE SUFFIX)					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2	PHONE #3			

REPORTING OFFICER	DATE	REVIEWED BY	
Phillips, Elliott	12/9/2021	Dansby, Jeremy M	12/09/2021

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.

Lake Charles, LA 70615

CASE# **2021-00147277**

GENERAL PROPERTY

GENERAL	PROPERTY CODE			VALUE
	Counterfeit/Forged			**$1.00**
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
		77 Other		
	ITEM DESCRIPTION			
	Signature on Life Insurance Policy forged.			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

REPORTING OFFICER	DATE	REVIEWED BY	
Phillips, Elliott	**12/9/2021**	**Dansby, Jeremy M**	**12/09/2021**

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.
Lake Charles, LA 70615

CASE# **2021-00147277**

INITIAL NARRATIVE

On December 9, 2021, at approximately 1315 hours, I, Sgt. Elliott Phillips was working the front Administration Desk, when a forgery complaint was being reported. The complainant, stated his ex-girlfriend has been threatening him and also opened a large life insurance policy on him. The complainant was advised a report would be done on the incident and Detectives would be in contact with him.

EOR/NFI
Sgt. Elliott Phillips 12808

REPORTING OFFICER	DATE	REVIEWED BY	
Phillips, Elliott	**12/9/2021**	**Dansby, Jeremy M**	**12/09/2021**

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.
Lake Charles, LA 70615

CASE# **2021-00147277**

SUPPLEMENTAL NARRATIVE

On December 9, 2021, at approximately 1315 hours, I, Sgt. Elliott Phillips was working the front Administration Desk, when a forgery complaint was being reported.

Sgt. Phillips, spoke with the complainant, John King, who stated his ex-girlfriend has been threatening him. King, stated his ex-girlfriend, Charmaine Colston has opened a $600,000 life insurance policy in his name. King stated the policy was opened at State Farm and was opened sometime in 2020. King, also stated Colston had transferred a $50,000 policy to her account from his, but State Farm has since corrected that account. King, stated he never signed any policy with State Farm as Colston the beneficiary, and that she forged his signature. King stated he and Colston were together for several years, also had two kids together. King advised Colston has been sending him threatening emails and text messages, stating he was going to kill him. King was very upset by this incident since Colston opened up the life insurance policy and she has been saying she was going to kill him.

King had a prepared statement ready for Detectives, that he would email to the Detective that contacts him. King also had several messages and the policy information that Colston opened up. King was advised a report would be done on the incident and Detectives would be in contact with him.

NOTE: King stated he works out of town a lot, but Detectives could contact him on his cell phone. King also provided his email, johncjking86@gmail.com

EOR/NFI
Sgt. Elliott Phillips 12808

A TRUE COPY
Mary Hanwka
Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Department
Lake Charles, LA

REPORTING OFFICER	DATE	REVIEWED BY	
Phillips, Elliott	12/9/2021	Dansby, Jeremy M	12/09/2021

FW: King

From: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

To: True King <truekingfile@gmail.com>

Date: Fri, 28 Mar 2025 10:18:00 -0500

Attachments:
Child Support.pdf

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>
Sent: Thursday, March 27, 2025 5:16 PM
To: Jinnifer Marcantel <jleblanc@schrumpf-law.com>
Subject: FW: King

You may send this to Mr. King, but unless they seize his interest in the judgment (assuming we eventually win) we will not be doing anything about this (unless Mr. King asks us to pay his part of the winnings toward his child support obligations

From: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>
Sent: Thursday, March 27, 2025 3:46 PM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>
Subject: King

I had gotten a call from someone (I have in my notes) this week saying that someone informed them that we represented Mr. King.

So here is what he owes for child support arears.

Thank you,

Jinnifer Marcantel

Paralegal to Oliver “Jackson” Schrumpf

Schrumpf Law Office, PLC

3801 Maplewood Drive

Sulphur, LA 70663

(337) 625-9077

(337) 625-8231 (fax)

If you have not executed a binding fee agreement or an agreement for representation, this firm does not represent you and this email is not an agreement of representation.

****Please note that unless expressly stated otherwise, I have NOT expressly designated my email address as appropriate for electronic service

of a pleading or other writing under LA CCP 1313.****

*Confidentiality Statement: *This e-mail transmission, and any documents, files, or e-mail messages attached to it, may contain confidential information that is attorney work product and/or legally privileged. The information herein is also protected by the Electronic Communications Privacy Act, 18 U.S.C.A. 2510-2521. The information contained in this message and any file transmitted with it is transmitted in this form based upon a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. If you are not the intended recipient, or the person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify sender immediately via return email or by telephone at (337) 625-9077 and destroy the original transmission and its attachments without reading them or saving them to disk or otherwise. Thank you.

SUPERIOR COURT OF NEW JERSEY
ESSEX VICINAGE PROBATION SERVICES

60 Evergreen Place, 7th Floor, East Orange, New Jersey 07018
Tel: (973) 776-9300 / Fax: (973) 766-9213
TTY/TTD (voice) dial 711 for New Jersey Relay Service

Ana C. Rivera
Probation Division Manager

Okey Emenuga, Katra Charlemagne
Assistant Probation Division Managers

Child Support Enforcement Services
PO Box 372, Newark, New Jersey 07101-0372
Tel:(877)-655-4371 / Fax (973) 424 - 2401

FAX TRANSMISSION

TO:	OLIVER SCHRUMPF, ESQ.	**DATE:**	03/27/25
FAX NO.:	(337) 625 - 8231	**NO. OF PAGES:**	4 (incl. Cover Sheet)
FROM:	Chiaka O. Judgment Coordinator	**WORKER ID NO.:**	
SUBJECT:	KING, JOHN CLIFFORD JOSEPH	**WORKER TEL. NO.:**	(877) 655 - 4371

COMMENTS: **Please see faxed information. Should you require additional assistance, contact customer service at (609) 421 – 6100 or fax at (973) 424 – 6815.**

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SUPERIOR COURT OF NEW JERSEY
ESSEX VICINAGE PROBATION SERVICES
60 Evergreen Place, 7th Floor, East Orange, New Jersey 07018
Tel: (973) 776-9300 / Fax: (973) 766-9213
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Ana C. Rivera
Vicinage Chief Probation Officer

Child Support Enforcement Services
PO Box 372, Newark, New Jersey 07101-0372
Tel: (877) 655-4371 / Fax: (973) 424-2401

Okey Emenuga , Katra Charlemagne
Vicinage Assistant Chief Probation Officers

Re: King, John Clifford Joseph
Child Support Case #: CS91774910A
Judgment #: J-024724-25
SS#: XXX-XX-1934
DOB: 04/17/1986

Dear Oliver Schrumpf, Esq.:

This letter is in response to your inquiry regarding the above child support case. According to the records of the New Jersey Child Support System, the current arrears due on the account as of 3/27/25 is **$33,186.11.**

If remitting payments, please make check/checks payable to - New Jersey Family Support Payment Center and mail to:

New Jersey Family Support Payment Center

Attn: Judgments and Writs

P.O. Box 55058

Trenton N.J. 08638

Should you require additional assistance, you may reach our office at (877) 655-4371 or via fax at (973) 424 – 6815.

Sincerely,

/s/ Chiaka Ofuya

Chiaka Ofuya
Judgment Coordinator / SPO

CSE 433
Rev. 12/13
07/12 Issue Obsolete
Rec. Ret. = 4CY

Louisiana Department of Children and Family Services
Child Support Enforcement Section

_____

_____

_____

Telephone

_____

Date

NOTICE OF ASSIGNMENT – LUMP SUM

Obligor: JOSEPH CLIFFORD JOHN KING
Docket No.: FJ-07-001941-25
LASES No.: _____
NCP's SSN: XXX-XX-1934

To the Payor of Income:

The above named obligor was ordered to pay $ 1,010.00 per MONTH for support. Our records indicate that as of this date the obligor owes $ 33,186.11 in past due support. Under LA R.S. 46:236.3, Child Support Enforcement is entitled to an income assignment.

In accordance with LA R.S. 46:236.3, you are hereby notified that the past due support is to be withheld from any payments due the obligor, including but not limited to bonuses, judgments, settlements, annuity, and retirement benefits. This notice shall remain in effect until further notice.

Please be advised that this does not relieve the obligor of any unpaid arrears owed in the child support case.

Make check payable to: Department of Children and Family Services. Send check to: Centralized Collection Unit. Address: P. O. Box 260222, Baton Rouge, LA 70826.

Note: Any monies not subject to withholdings (i.e., F.I.C.A., federal and state taxes, etc.) should not be subject to the 50% limitation as found in LA R.S. 13:3881(a)(1).

If you have any questions, please contact this office.

Sincerely yours,

CHIAKA OFUYA, SPO | JC
Department Representative

(877) 655-4371
Telephone

ESSEX COUNTY
Probation Division, Child Support Enforcement
PO BOX 372
CHILD SUPPORT ENF UNIT
NEWARK, NJ 07101-0372
Website: www.njchildsupport.org

(877)655-4371
Fax: (973)776-9933

COLSTON CHARMAINE YVETTE
Plaintiff [X] Obligee [ ] Obligor

vs.

KING JOHN CLIFFORD JOSEPH
Defendant [ ] Obligee [X] Obligor

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART

Docket Number: **FD-07-001941-25**
Case ID: **CS91774910A**

CIVIL ACTION CERTIFICATION OF ARREARS

The undersigned certifies that the records of the **ESSEX COUNTY** Probation Division indicate the obligor:

(1) Was ordered by the Superior Court of New Jersey, on **07/01/2024** to pay $ **1226.67 MONTHLY** as support and / or arrears payments.

(2) Has failed to make payments. Arrears / Credit as of **03/27/2025** are:

$ **33,186.11** to the obligee

Total due $ **33,186.11***

*Post judgment interest may be due from the obligor on the case.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Dated: **03/27/2025**

NORMA RIVERA
SENIOR PROBATION OFFICER

John C. J. King Sr.
123 North Louisiana Avenue
Lake Charles, Louisiana 70615
truekingfile@gmail.com
318-995-1705
02/10/2025

Subject: Formal Objection to Transfer of Child Support Enforcement to New Jersey Louisiana Case #38070201

To Whom It May Concern,

I am writing to formally dispute the transfer of my child support enforcement case (**Louisiana Case #38070201**) from Louisiana to New Jersey. This transfer is improper under the **Uniform Interstate Family Support Act (UIFSA)**, as New Jersey has no legal basis to assume enforcement. Additionally, I was not properly notified or given due process before this request was made.

According to UIFSA, a state may not assume jurisdiction over a child support case unless **one or more of the following conditions are met**:

1. The obligor (myself) has established **residency** in the state.
2. **Both parties consent** to the transfer.
3. The issuing state (Louisiana) no longer has a significant connection to the case.

Since **none of these conditions apply**, this transfer should be denied. Specifically:

1. **No Residency or Connection to New Jersey:** I have never established residency in New Jersey. My **only permanent address** is **123 North Louisiana Avenue, Lake Charles, Louisiana 70615**. I have worked in multiple states over the years due to the nature of my profession, but I do not live, work, or have financial obligations in New Jersey.
2. **I Do Not Consent to This Transfer:** I **explicitly object** to New Jersey assuming enforcement of this case. I request that the jurisdiction remain in Louisiana, as required by UIFSA.
3. **Lack of Proper Notification & Due Process:** I was **never notified** or given the opportunity to contest this transfer before it was initiated. At no point was any documentation provided to justify a transfer. This lack of due process further invalidates the request.
4. **Hardship & Financial Strain:** Transferring this case would create significant hardship, as I am **currently unemployed and battling temporary disability**. Louisiana DCFS is already familiar with my financial situation and payment history, making enforcement more practical within Louisiana's jurisdiction.
5. **The Current Child Support Amount Is Incorrect and Requires Review:**

    - The **current support amount is too high and does not accurately reflect my financial situation**.
    - Louisiana DCFS is already familiar with my case, my past payments, and my financial circumstances, making it the appropriate jurisdiction to address any necessary modifications.
    - Transferring enforcement to New Jersey could **further complicate corrections or adjustments**, creating unnecessary confusion in an already complex situation.
    - Additionally, I previously **requested and paid for a paternity test** through LabCorp at a designated location in **Orange, Texas**, but the **mother failed to present the child for testing** at the required location. This unresolved issue should be addressed under Louisiana's jurisdiction.
6. **Continued Louisiana DCFS Communication:** As recently as **the last week of January 2025**, I received a letter from **Louisiana DCFS in Baton Rouge**, dated **January 18, 2025**, regarding health care information. This confirms that Louisiana still actively manages my case and has jurisdiction over enforcement.

Request for Action

Given these facts, I respectfully request the following actions:

- **Deny the transfer** of my child support enforcement case to New Jersey and confirm that Louisiana retains jurisdiction.
- **Remove any incorrect addresses** from my record and ensure that my correct and only address is listed as **123 North Louisiana Avenue, Lake Charles, Louisiana 70615**.
- **Provide a written response** confirming receipt of this objection and detailing the next steps.

If additional documentation is required, I am prepared to provide further proof of my Louisiana residency, payment history, financial hardship, and correspondence with Louisiana DCFS.

Thank you for your time and prompt attention to this matter. I look forward to your response.

Sincerely,

John C. J. King Sr.

June 3, 2024 *johncjking86@gmail.com*
LASES# 380702-01
John C King

Urgent Attention: Charde Carter
CC: Randall Sterrett Attorney DCFS Lake Charles,LA
DCFS Child Support Enforcement
PO Box 94065
Baton, Rouge LA 70821
Reference Calcasieu Civil Case # 2021-2773
King: Plaintiff
Colston: Defendant

LETTER OF WARNING: CRIMINAL ACTIVITY INVOLVED
Warning Disturbing Images Attached-*Memorialize this for the Record at DCFS*

Good Morning Ms Carter,

I am responding to a letter from Ms Charde Carter, (image below),as it is stated it is mandatory that I respond. It was dated May 22, 2022 and I had a surgical procedure that week. It is documented and recorded. Ms Carter I am ashamed that you and your office are being dragged into this increasingly contentious case that is becoming not only criminal in nature but violent as well and I must warn you and your supervisor so that your agency does not accidentally overstep into state and federal criminal and civil proceedings.

I am only responding because you contacted me and said it's mandatory and my legal counsel is on vacation and can't respond by your deadline.

I am tired and I want this to end but not with innocent people getting hurt like my children and family have been subjected to.

She has a mental illness and if after reading the notes and my ongoing medical record and employment history you cannot see that i don't know what else to do. Go pull my record. Why do I keep losing good jobs? Why are my coworkers the last 13+ years all saying the same thing in affidavit? Its a form of domestic violence and financial abuse and case workers such as yourself get roped in without knowing the destruction and violence and mood swings Charmaine Coslton is capable of. She is unstable and obsessed and its continuing to escalate with me as her intended victim.

I am also required to provide all correspondence that would interrupt my civil rights to indemnify me the rights to a company asset that has a lien against it by an FDIC accredited institution against the value of the automobile which takes precedent and since you do not know all of the

details involved in this complex legal minefield that Charmaine is dragging you into I caution you as Mr Sterret can attest the last person Renee Amos committed a federal crime she claims she was manipulated by Charmaine Colston with the poor single mother narrative only to now be on trial for felony involvement in stolen vehicle, fraud debt instrument, false power of attorney, false transfer of securities fraud all by agreeing to notarize documents while i was married and living out of state and I was not in the state with ID in hand nor did I provide signature. Ms Amos is now financially on the line for the mistake made.

She is now trying to loop Ms Carter and DCFS into the proceedings so that when State Farm and The Hartford seek recourse for federal laws being broken which state that Colston can by no means benefit from a crime she involved herself in with intent to defraud for financial gain. If a state government agency unknowingly involves themself then Charmaine will simply allow both insurance companies to sue the DCFS for recourse stating that you used the DCFS agency to circumvent federal law. If she burned my house down and an insurance company indemnify me for my losses and you send a letter to my lawyer stating that they must turn over the funds to Ms Colston and say that it is your authority as a government agency to aid in that criminal behavior i can assure you State Farm will seek recourse to recoup their losses. Child support does not involve indemnity, marital assets, or automobiles with liens against them which is the case in this matter. **A collateral loan was taken out against my stolen vehicle and the financial institution is demanding to be indemnified for their losses as I then lost my job. I will find it necessary in any proceedings with them to let them know that I did fight to get their funds back to them as liens and indemnity ARE NOT INCOME AND NOT SUBJECT TO CHILD SUPPORT JURISDICTION OR IT WOULD CAUSE CHILD SUPPORT TO ACT IN A CRIMINAL LAW ENFORCEMENT CAPACITY WHICH IT IS NOT EMPOWERED TO DO SO.** I will also welcome official proceedings to investigate the matter unfortunately if opening that investigation finds Colston responsible she may stand trial for multiple federal crimes and if found guilty prison time. She is so one track minded all she sees is trying to hurt me not what shes doing to her. and prison that has not been my intention as I know she is mentally ill , and its not healthy for my children and simply as you can see by images attached cannot move past a failed relationship which I tried to escape and I am still trying to escape. She will not go away. She is obsessed with every job, every court settlement, she won't accept the IRS payments that would clear my arrears. Ms Carter , Charmaine Colston has tunnel vision for revenge only and is recklessly destroying the lives of every individual or agency that is attached to our cases. She doesn't care if you lose your job proof is that she didn't tell you that the auto case goes to trial November 14, 2024 Lake Charles City Court Case # 23-2124 and Mr Sterret, your legal counsel for the state, would back me up in telling you she lured you into writing a letter which would hold your agency liable, and you and your job in danger. I highly recommend that you make Charmaine Colston communicate with you in writing with no visits to your office as she is putting it on facebook as if it is your fault or that I somehow am evading justice for 1. She gets me fired multiple times and promises to do it again. 2. She caused my fall

and injury by making up a lie stating my son was dying and in emergency surgery and I needed to rush to Lake Charles which was an attempt for her to sleep with me.

I am expressing that Charmaine Colstonno longer be allowed to use the DCFS office as her personal bullying service and that on the record something be done about this continued abuse of power which is contributing to extremely tense, unhealthy and sometimes violent interactions and confrontations with friends, family, shouting matches at the DCFS office threats to the charter school board. We will get to the bottom of exactly the extent these abuses have been allowed to highlight the exact number of phone calls, texts, emails, acts of contempt by blatantly refusing court orders. I will no longer all Charmaine to continue to violate harassment laws by using the DCFS as an extension and tool to continue her terrorizing and down right despicable behavior; which has affected ny employability, caused injury to my nervous system and resulted in several surgeries and intense medical evaluations from the never ending 24/7 torment of the last 15 years. Please pay attention, as for as long as I was a victim to this woman's deranged advances for years there were no child support issues but ever since then you see repeated terminations and constant outside phone calls to employers who have affidavits, provided evidence of her phone calls which has at times tied up dispatch lines for an entire day costing them hundreds of thousands in production as no 18 wheelers could move or communicate while dispatch was tied up. I am sick of this and have contacted the authorities to conduct a full thorough investigation into how many times shes contacted family, friends, employers, law enforcement, judges, written my attorneys ex parte, and openly and definitely stated she won't obey Judge Mitchell Redd or Mr. She provokes and seeks violence by coercive control and refuses to leave my family alone and all members who she contacts via text phone and email are participating in this investigation and will be seeking permanent protective orders for themselves, their families and employers.

Ms Carter and Mr Sterret, I am writing to you on behalf of the best interest of my children minors Jayla King, John King Jr, and Jakai King. Over the case of this trial and support proceedings all of us including the DCFS headquarters have been subjected to an excessive amount of daily abuses by Charmaine Colston including but not limited to phone calls, emails, pop up visits, harassment, multiple case workers being put on the case. This does not even include the amount of continued stalking, slander, and calling employers which resulted in multiple terminations. I have signed affidavits from coworkers the last 13 years each highlighting violent incidents where Colston's behavior has and continues to affect my employment opportunities. My health and work history are plagued by excessive non stop texting phone calls, showing up on job sites, she has even contacted over 300 different coworkers at different extensions at the best employer I ever had in New York. Resulting in an investigation and my ban from Banker Steele projects. They have provided recordings of her numerous and excessive phone calls saying I don't take care of my kids, saying I beat her, saying I needed to lose my job to the point where law enforcement has had to become involved on multiple occasions. Colston during this investigation has and continues to engage in cyberstalking crimes where she has hacked the

google emails , text, illegal gps tracking, hacking multiple apps to forward myself and family members texts to her phone. She then pretends as though she “obtained” these texts from family. I am writing to warn this will not be tolerated anymore and I have taken appropriate action with the appropriate agencies to free myself from this psychological bondage of this clearly mentally disturbed fatally attracted individual. I ask only that she not use your offices as a tool as an extension of her abuse and harassment. The threats she makes to Ms Carter and multiple falling outs at the DCFS office is sickening. It's disgusting what you all have to endure and even more disgusting that her actions have caused to me financially, mentally and emotionally there are existing court orders that prevent her from slandering me and my family but as you can see form below she not only slanders me but is telling the public it is your offices that are responsible.

It is the duty of DCFS to act non biased, legally in accordance with the law so that if and when this investigation proceeds DCFS is not found to have aided this monster and any violent consequences that result from her threats and erratic behavior. I have worked and been respectful to my caseworkers at DCFS. It is Colston who bombards your office daily with emotionally uncontrolled tantrums. If this is what she's doing in broad daylight, imagine what I'm experiencing behind closed doors that are disrupting my medical care, licensing, and treatment. She has refused child support payments in the past on multiple occasions to the point where I no longer trust or know which method is legally binding at the moment. The state law says she is entitled to all $21,000.00 of my unpaid tax returns this would clear all arrears but Colston doesn't want the money she wants my drivers license suspended, she wants my credentials revoked she is bitter and scorned for no reason over a failed relationship from five years ago that she herself in writing ended and said she was involved sexually with other men and women and since then has withheld my children, stalked, stolen vehicles, committed SEC and insurance fraud, continues act in a way that is increasing felony level harassment charges as she is now putting my wifes face and name on her facebook page. Along with slander and harassment of my family, parents and grandparents. What does any of this have to do with my children? (please read below)

In accordance with state law, both parents must legally comply and both employers must be contacted. I am requesting that my civil rights by matter of procedure be upheld and that her employer at Homsi in Lake Charles Louisiana be sent a letter just as you willingly send letters to whomever she demands without proof that the income of Charmaine Y Colston be provided to the DCFS office. Address: Homsi's Tobacco and Beer 2612 Kirkman Street, B, Lake Charles LA 70601 as you can see from the facebook posts she is admitting to working there committing perjury as Mr Sterret witnessed her on the stand under oath say she doesnt work there and hasn't been employed there. The children are entitled to equal share of both parents' incomes and I am entitled to fair calculations.

Additionally Charmaine Colston has participated in criminal activity one of which is the stealing of my automobile and this case is ongoing. As you know Charmaine Colston is legally prohibited from benefiting financially from any crime she willingly participated in for the sole purpose of financial gain and indemnity is NOT a source of income. (Ex state farm replacing a stolen or damaged work car or piece of equipment) if it is found she committed a crime with the strategy to increase her revenue and did in create capital gains she will be prosecuted by the insurance company from which she benefitted from which will result in felony criminal charges as both State Farm and The Hartford are entitled to recourse. Once DCFS is made aware that she stands to gain from criminal activity there is protocol and procedure to take action so that the state agency does not unintentionally interfere in either criminal, or federal laws which would then pull Ms Charde Carter and the Lake Charles office into the trials initiated by the insurance groups. This would allow the state to be named defendant if they ordered a crime to be committed by omission. I assure you that the insurance company will without a doubt be investigating if Colston stands to benefit by manipulating a government agency to aid in her crimes while knowing full well the proceedings are open and ongoing as her own attorney attended the proceedings on April 21, 2024 and will also be called as a witness.

I have supplied links to the case numbers attached for your office to review and consult with legal counsel. Colston nor DCFS have justification to violate my civil rights and action to indemnify me so that I may obtain transportation to feed my children. A driver's license and transportation are required to feed my children. I do not wish to have Ms Carter, the Lake Charles DCFS office, Mr Sterret or others subject to federal investigations as you know for example arsonists cannot benefit from the structure they burned down for the insurance money. Similarly the insurance company will seek damages from Colston as she cannot benefit financially from a car she stole and to my knowledge there are cases in existence where the Louisiana Supreme Court has ruled on this.

I am tired of Colston and exhausted from her 15 years of unending stalking manipulation and refusal to make my children's needs a priority. I desire to provide unlimited financial means for my children, I always have. If I were a different gender the abuse would be bold and non deniable but since this is not the case I've had to go to a federal level to seek protection for myself, my family, my children and yes protections for the DCFS office and their employees as we were all sick of hearing from her. If this were about money she would open the letters from the IRS sent to her at her Country Club Road address and release the $21,00.00 held in tax returns. All it takes is me carrying one child, she carries the other two and nearly $21k -$24 K will fall into the DCFS account and we will all be free of her. But no she doesn't want the money, she says she earns over $50k per year and is above the system and no one can stop her not the Judge Redd, not DCFS, not Mr Sterrett she doesnt want money so please exercise discretion why is she terrorizing me if Im fighting for my children and fighting to get transportation to provide for them.

Please refer to the following criminal case numbers
Calcasieu Parish - Case criminal case # 2021-00123665
Lake Charles City Court - Case # 23-2124
(Charge;Statute 14: 67.26. C(2)- * Theft of a motor vehicle between five thousand and twenty five thousand dollars)
Charge (Statute 14:72.A) Forgery

It is important that Ms Carter refer this case to the legal department and seek protections for herself by redacting any letters she sent out that would imply the agency's reach would supersede any court rulings and criminal investigations. My intention is not to have anyone else harmed unknowingly like Colston did to Renee Amos. She convinced Renee Amos to commit a crime and as a result Renee Amos is on trial for Colston's actions and deceit. Ms Carter this isn't a case about a "poor single mother" this is a criminal. I have suffered loss of employment and financial losses as a result of this crime and I do not want decent people's jobs to be hurt.

Coming after my drivers license and my right to have work transportation is not about money it's an attempt to keep me handicapped from being unable to earn income. She knows I had to declare bankruptcy and when she got me fired my car was repossessed. THIS ALL IS INTENTIONAL LOOK AT THE FACEBOOK BRAGGING! SHE WILL INTENTIONALLY MAKE ALL OF YOU LOSE YOUR JOBS PLEASE HEED THE WARNING OF THIS LETTER AND MAKE YOUR SUPERIORS AWARE SO THAT THEY MAY ESCALATE IT. Because the insurance companies lawyers will have to investigate the beneficiary of these dealings and if it is found that Coslton was involved it will open a can of worms unnecessarily. I want only to heal from my surgeries, no longer be susceptible to stroke from harassment, buy my work car and use it to provide for my children.

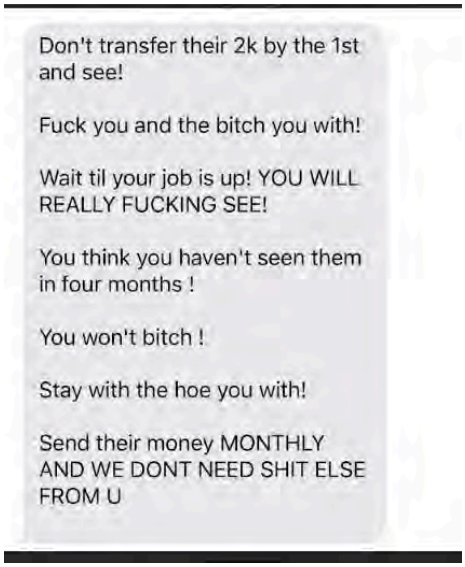
Examples Below and Thank You
John C King Sr.

1. Link Child Support Payments :https://docs.google.com/spreadsheets/d/1BuQcTOiXrdlEquP4TqxJqgwFLiDjqczbRxGqas0d26Q/edit?usp=sharing
2. May 25 2024 Stipulated Judgement https://drive.google.com/file/d/1ABusjfytIrVy0oB2Y9GRPieXZc5H69h3/view?usp=sharing

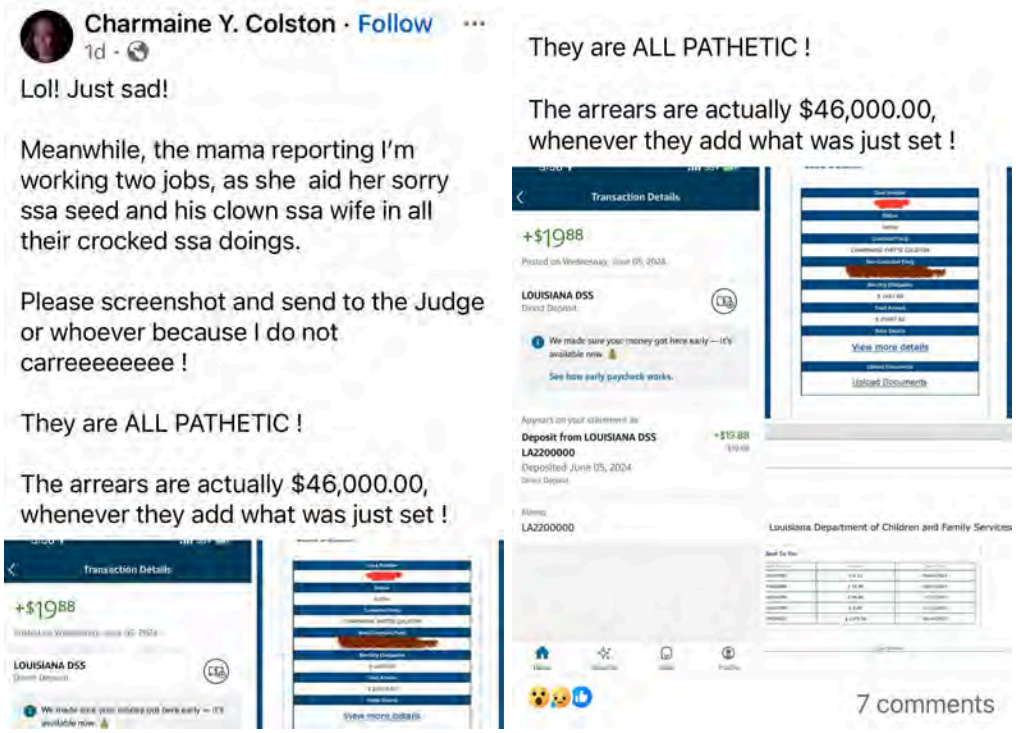
    - Provided OFW App correspondence where i've offered to pay her and she refused the payments.

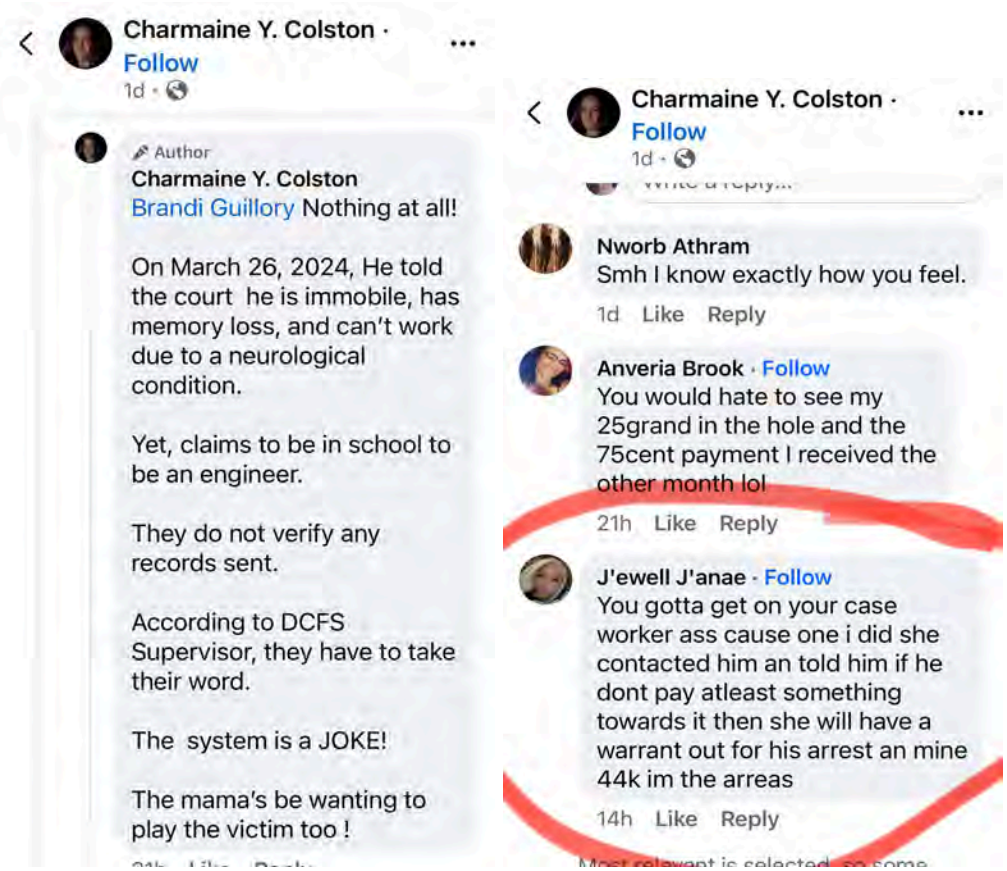
- Has stated in courts that the payments on the child support register are gifts
- Continues to lie about the current stipulated judgment she does not know nor will she be owed $46,000.00 when the judgment you read clearly says $24,000.00 total. Everything is a trick with her. I provided my income last year was $30K and the year before $15 k ive paid her almost $55k for 2021, 2022, and 2023 so what kinda math would entitle her to $46K more dollars? The hell is ongoing and never ending and she will not stop pursuing me and my family and harassing my wife calling her “itches” in writing to hundreds of ppl this is evidence she is attempting to use your agency instead of allowing the courts to exercise justice and should be banned from your office until investigations and all litigations are complete on all state and federal levels.

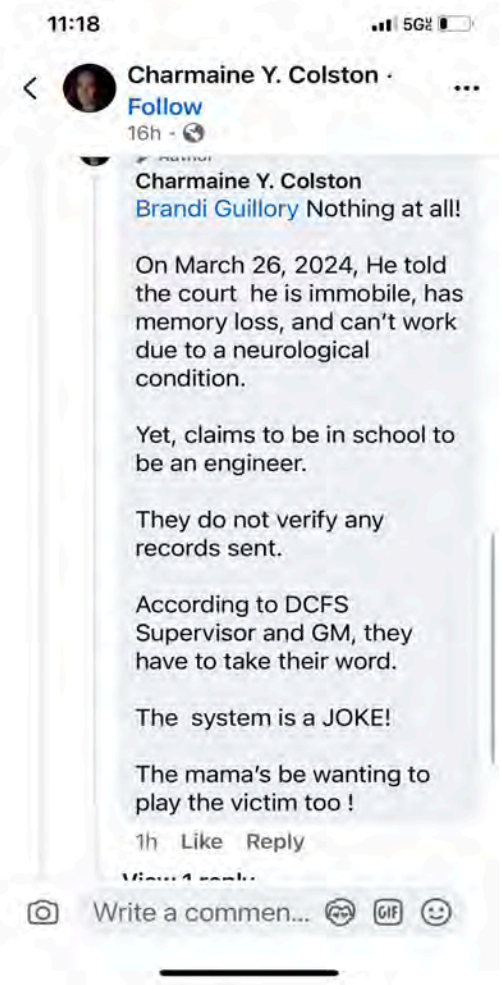
3. Text threatening to call my next job and get me fired again



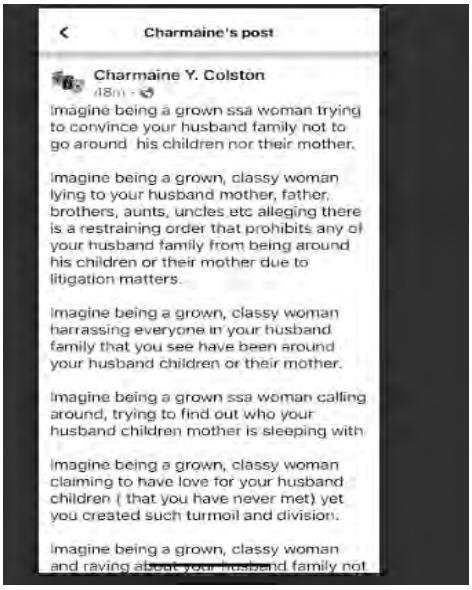
4. Facebook threats June 2, 2024 concerning DCFS OFFICE AND MS CARTER THE CASE WORKER AND CHILD SUPPORT


Charmaine Y. Colston · Follow
1d -
Lol! Just sad!
Meanwhile, the mama reporting I'm working two jobs, as she aid her sorry ssa seed and his clown ssa wife in all their crocked ssa doings.
Please screenshot and send to the Judge or whoever because I do not carreeeeeeee !
They are ALL PATHETIC !
The arrears are actually $46,000.00, whenever they add what was just set !
They are ALL PATHETIC !
The arrears are actually $46,000.00, whenever they add what was just set !
Transaction Details
+$1988
LOUISIANA DSS
Deposit from LOUISIANA DSS
LA2200000
Deposited June 05, 2024
View more details
Upload Documents
Louisiana Department of Children and Family Services
7 comments

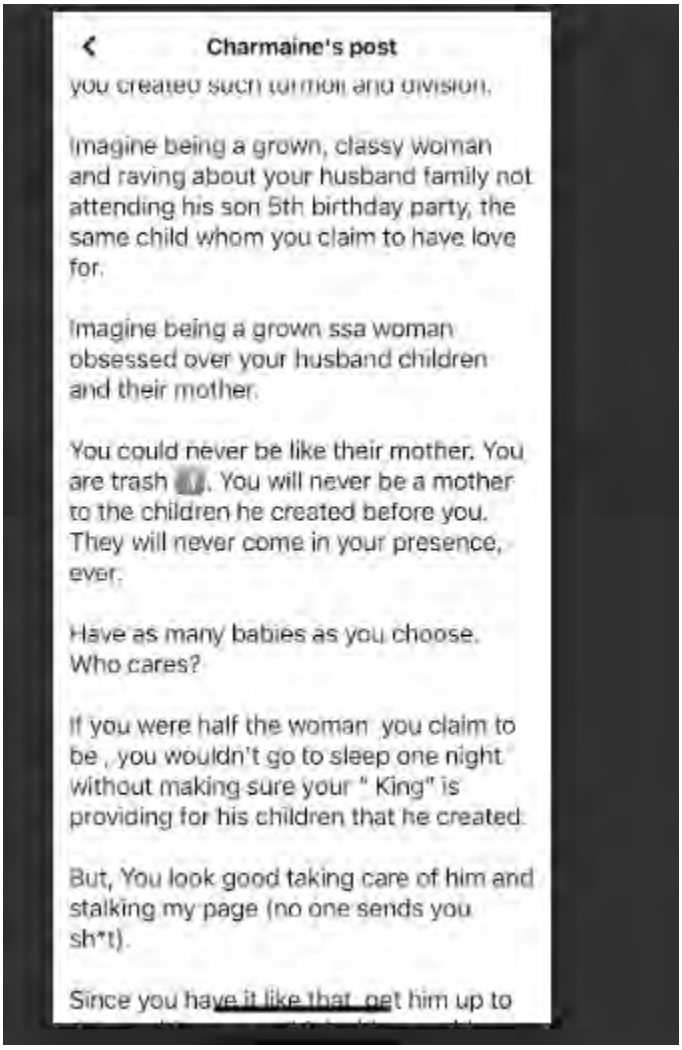

Charmaine Y. Colston ·
Follow
1d ·
Author
Charmaine Y. Colston
Brandi Guillory Nothing at all!
On March 26, 2024, He told the court he is immobile, has memory loss, and can't work due to a neurological condition.
Yet, claims to be in school to be an engineer.
They do not verify any records sent.
According to DCFS Supervisor, they have to take their word.
The system is a JOKE!
The mama's be wanting to play the victim too !
Charmaine Y. Colston ·
Follow
1d ·
Nworb Athram
Smh I know exactly how you feel.
1d Like Reply
Anveria Brook · Follow
You would hate to see my 25grand in the hole and the 75cent payment I received the other month lol
21h Like Reply
J'ewell J'anae · Follow
You gotta get on your case worker ass cause one i did she contacted him an told him if he dont pay atleast something towards it then she will have a warrant out for his arrest an mine 44k im the arreas
14h Like Reply

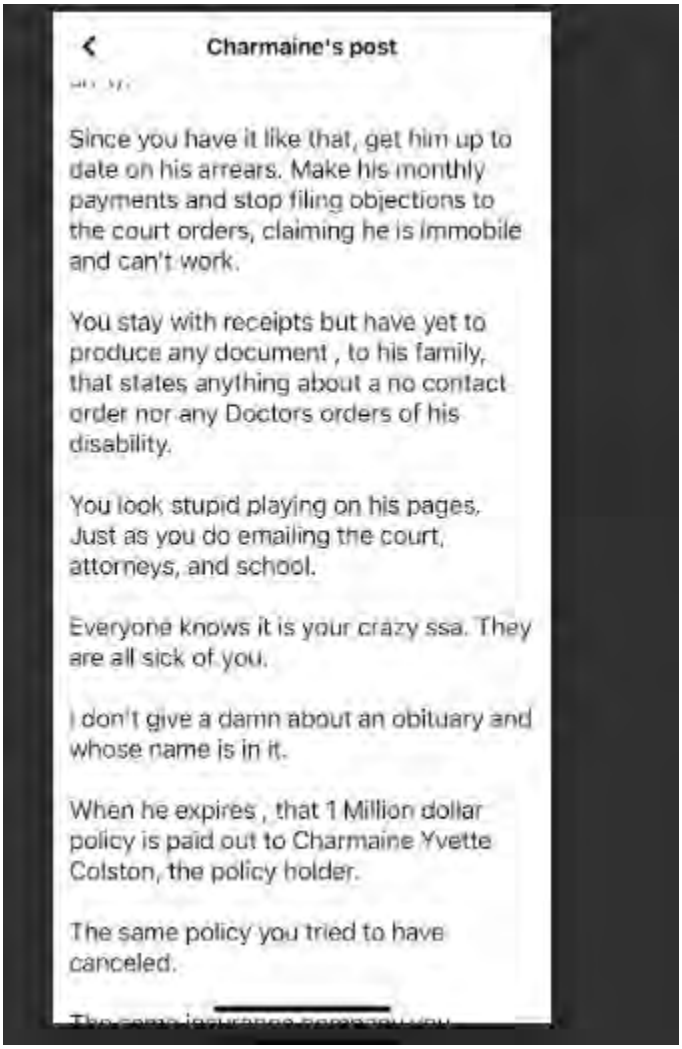


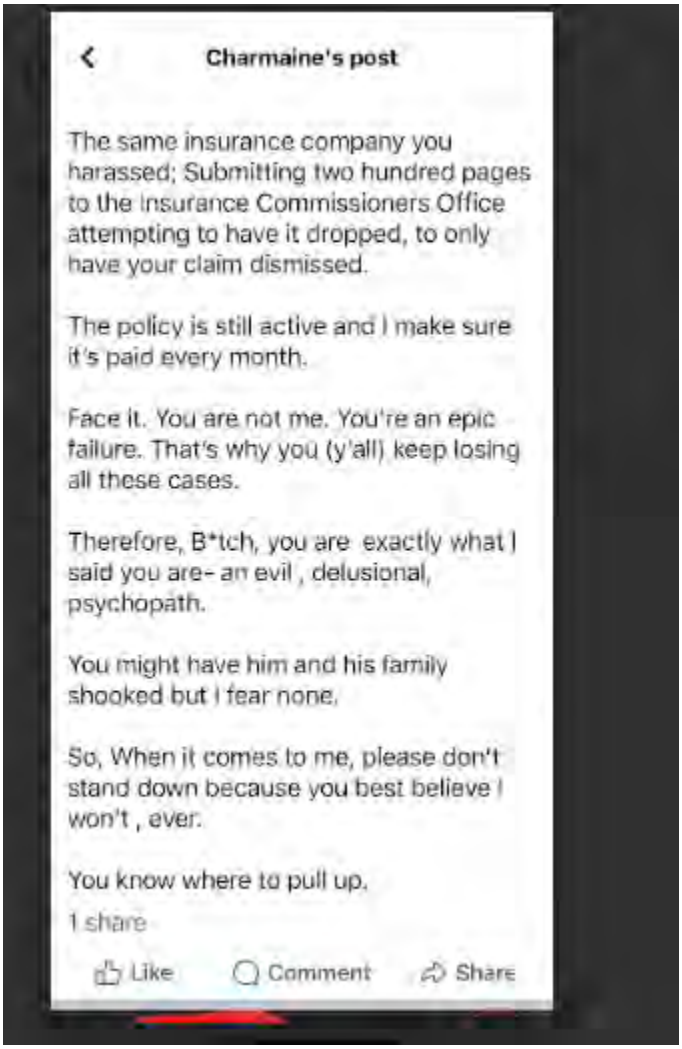
5. Facebook Threats/Slander of DCFS and Judge Redd Nov23-May24
    - Colston implies that the DCFS office is somehow communicating and siding with her abuse and harassment and no one has the power to stop her.


Charmaine's post
Charmaine Y. Colston
Imagine being a grown ssa woman trying to convince your husband family not to go around his children nor their mother.
Imagine being a grown, classy woman lying to your husband mother, father, brothers, aunts, uncles etc alleging there is a restraining order that prohibits any of your husband family from being around his children or their mother due to litigation matters.
Imagine being a grown, classy woman harrassing everyone in your husband family that you see have been around your husband children or their mother.
Imagine being a grown ssa woman calling around, trying to find out who your husband children mother is sleeping with
Imagine being a grown, classy woman claiming to have love for your husband children (that you have never met) yet you created such turmoil and division.
Imagine being a grown, classy woman

johncjking86@gmail.com




Charmaine's post
Since you have it like that, get him up to date on his arrears. Make his monthly payments and stop filing objections to the court orders, claiming he is immobile and can't work.
You stay with receipts but have yet to produce any document , to his family, that states anything about a no contact order nor any Doctors orders of his disability.
You look stupid playing on his pages. Just as you do emailing the court, attorneys, and school.
Everyone knows it is your crazy ssa. They are all sick of you.
I don't give a damn about an obituary and whose name is in it.
When he expires , that 1 Million dollar policy is paid out to Charmaine Yvette Colston, the policy holder.
The same policy you tried to have canceled.


Charmaine's post
The same insurance company you harassed; Submitting two hundred pages to the Insurance Commissioners Office attempting to have it dropped, to only have your claim dismissed.
The policy is still active and I make sure it's paid every month.
Face it. You are not me. You're an epic failure. That's why you (y'all) keep losing all these cases.
Therefore, B*tch, you are exactly what I said you are- an evil , delusional, psychopath.
You might have him and his family shooked but I fear none.
So, When it comes to me, please don't stand down because you best believe I won't , ever.
You know where to pull up.
1 share
Like
Comment
Share



6. Facebook harassment continued….



Charmaine Y. Colston
13h ·

Diesha Radasha · Follow
Reels · Jan 15 ·

I remember asking my counselor " What if I leave and he gives the next girl everything I ever asked for?" And she said something that'll forever stick with me! "What if someone finds you and they give you everything without even asking?" And a year later all is well. Never settle❤️

❤️Add me on TikTok to see a smidget of my story _DieshaRadasha

❤️https://www.facebook.com/share/r/E8rLEdZcqKDWaVka/?mibextid=PkCAf5

Diesha Radasha Follow



Charmaine Y. Colston · Follow
34m ·

Good Morning !

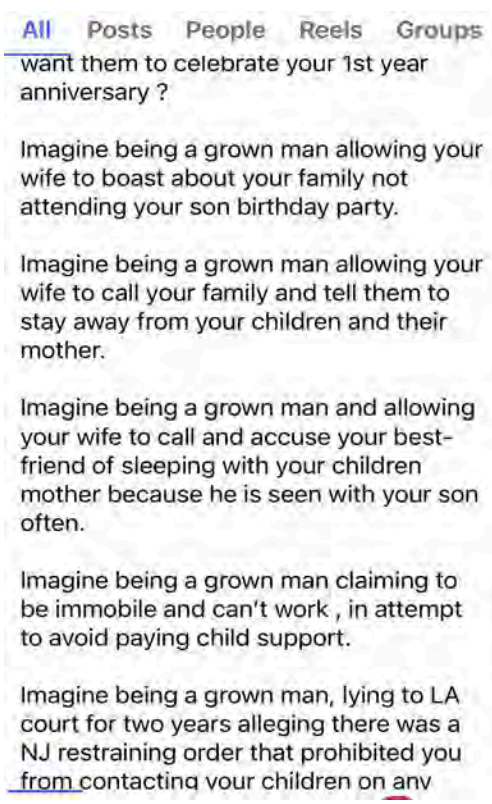
Thank you Father God for another day! Thank you for your protection, your grace, and your favor.

I ask in advance that you (God), The Judge, My Attorney, My Family , My Father N Law, My Children family , and MY FBF please forgive me for this lengthy post.

I try so hard to be meek and humble. Just as hard as I try to be still/ silent and better my ways/past.

I usually take the high road. I have done so for awhile now but the truth must be told.

I'll deal with the Judge next month; if the other party does not file a continuance and have it granted, again. 😊



All Posts People Reels Groups

want them to celebrate your 1st year anniversary ?

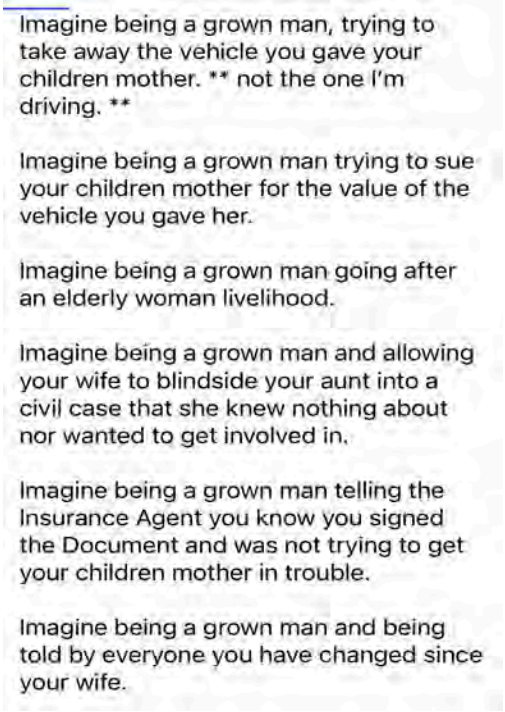
Imagine being a grown man allowing your wife to boast about your family not attending your son birthday party.

Imagine being a grown man allowing your wife to call your family and tell them to stay away from your children and their mother.

Imagine being a grown man and allowing your wife to call and accuse your best-friend of sleeping with your children mother because he is seen with your son often.

Imagine being a grown man claiming to be immobile and can't work , in attempt to avoid paying child support.

Imagine being a grown man, lying to LA court for two years alleging there was a NJ restraining order that prohibited you from contacting your children on any



Imagine being a grown man, trying to take away the vehicle you gave your children mother. ** not the one I'm driving. **

Imagine being a grown man trying to sue your children mother for the value of the vehicle you gave her.

Imagine being a grown man going after an elderly woman livelihood.

Imagine being a grown man and allowing your wife to blindside your aunt into a civil case that she knew nothing about nor wanted to get involved in.

Imagine being a grown man telling the Insurance Agent you know you signed the Document and was not trying to get your children mother in trouble.

Imagine being a grown man and being told by everyone you have changed since your wife.

Imagine being a grown man allowing your wife to act as you and email the court stating your children mother killed your children and she was admitted into a psychiatric institution.

Imagine being a grown woman , at your big age, creating multiple fake IG accounts to harass your husband children mother.

Imagine being a grown woman posting literally over 500 post regarding your husband , children mother.

Imagine being a grown woman stalking your husband children and their mother.

Imagine being a grown woman and inserting yourself in a matter that has never involved you.

Imagine being a grown woman pillow talking with a man about his children mother relationship history from sixteen

because your father in law loves his grandchildren mother and not you.

Imagine being grown woman portraying to have this so called relationship with your nlaws knowing they don't want anything to do with you.

Imagine being a grown woman and not telling your husband audience how many times your lunatic ssa have been told by your nlaws to stop contacting them.

Imagine being grown woman claiming to refuse to drag your father n law on facebook but disrespects him in private.

Imagine being a grown woman harrassing your mother n law and being the reason she totaled her vehicle.

More than a few things are clear here:

One being, Your husband is not a man and has not given up his childish ways.

Imagine being a grown woman pillow talking with a man about his children mother relationship history from sixteen years a go.

Imagine being a grown woman still stuck on what happened two years ago, after you harassed and provoked me.

Imagine being a grown woman thinking your idiotic plan was going to hold up in court.

Imagine being a grown woman who believes her own lies.

Imagine being a grown woman lying about being pregnant.

Imagine being a grown woman butt hurt because your father in law loves his grandchildren mother and not you.

Imagine being grown woman portraying to have this so called relationship with

are you happy thinking of me everyday? You email the court twelve page letters every damn day. You think your behavior is normal?

You are a fan, admit it. What is it about me that has you hooked?

If you wanted to be my friend, you should have said that. I don't hold grudges but I don't play with b*tches either. With that said, You have broken the camels back.

You don't want to be cordial. You like discord.

You are jealous of me for whatever reason. I don't want your man. That's why you have him.

You're welcome.

You want him and his family to despise me so bad.

You are really sick and it is very

Two, You are not a woman , you are evil, a narcissist, manipulative, unstable, spiteful, overbearing, envious, and controlling.

Three, you need to see a psychiatrist , immediately.

Four, you seek validation/love and appear to have a deeper issue embed.

Five, you choose to live in the past and keep confusion going.

In October of 2021, The Hearing Officer advised to move forward with a clean slate. That wasn't good enough for you.

Six, You are a joke and I am a force to be reckoned with.

Unlike you, I don't have to speak from a fake page nor someone elses page.

All Posts People Reels Groups

for them, who celebrates them. The invite was extended. They have me and plenty of family who loves, support and backs them, without your approval.

The only last name you should be concerned about is the one you write the childsupport check out to and that would be me, Colston. So that I may spend your money on my children. Since your husband can't keep a job.

Okay. I am done for real this time.

I put my faith in God and the system that everything will be taken care of him.

Justice will be served for me and my children.

God Bless,

Ms. Colston

1 comment

You are really sick and it is very concerning.

Your actions and hate for me is the very reason why you will never be around my children, ever in life.

Nothing will trump what I say.

Screen shot and send it to the court.

You need to stop stressing yourself trying to get a win, you won't.

Relax, you already lost all your edges.

I am convinced you both are on some sort of drug because who goes to this extent. How do you sleep?

In conclusion,

God blessed me with my children. I don't care who support them, who shows up for them, who celebrates them. The invite was extended. They have me and plenty

Charmaine Y. Colston

Posts About Videos More

Calling people to see if I am sleeping with them.

Lying to our nlaws telling them they can't be around me nor my children.

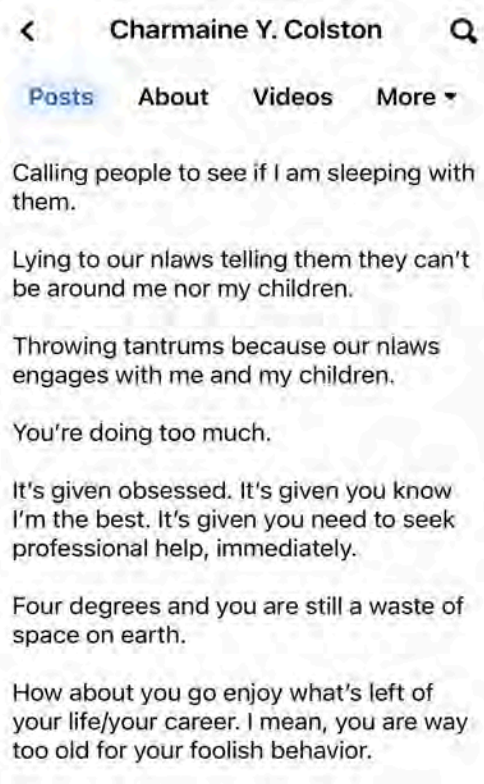
Throwing tantrums because our nlaws engages with me and my children.

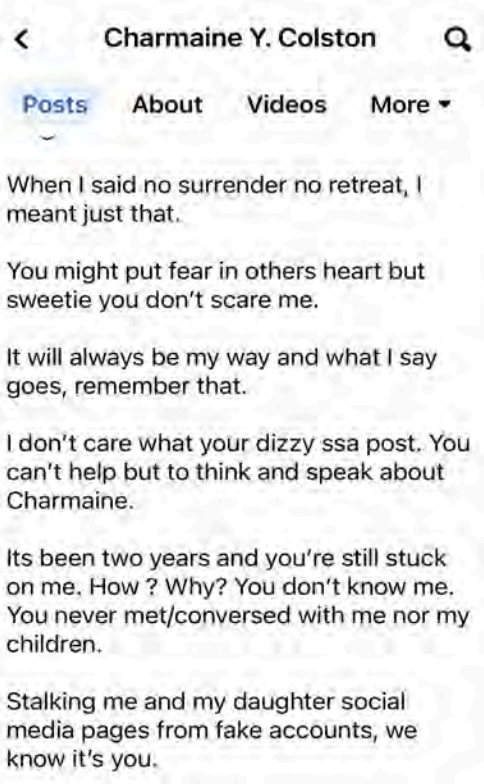
You're doing too much.

It's given obsessed. It's given you know I'm the best. It's given you need to seek professional help, immediately.

Four degrees and you are still a waste of space on earth.

How about you go enjoy what's left of your life/your career. I mean, you are way too old for your foolish behavior.


Charmaine Y. Colston
Posts
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Calling people to see if I am sleeping with them.
Lying to our nlaws telling them they can't be around me nor my children.
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Charmaine Y. Colston
Posts
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Videos
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When I said no surrender no retreat, I meant just that.
You might put fear in others heart but sweetie you don't scare me.
It will always be my way and what I say goes, remember that.
I don't care what your dizzy ssa post. You can't help but to think and speak about Charmaine.
Its been two years and you're still stuck on me. How ? Why? You don't know me. You never met/conversed with me nor my children.
Stalking me and my daughter social media pages from fake accounts, we know it's you.


Charmaine Y. Colston
Posts
About
Videos
More
It's given obsessed. It's given you know I'm the best. It's given you need to seek professional help, immediately.
Four degrees and you are still a waste of space on earth.
How about you go enjoy what's left of your life/your career. I mean, you are way too old for your foolish behavior.
Nevertheless, I look forward to finally meeting you.
Like
Comment
Share
Charmaine Y. Colston
16h
What do you do when
Follow
Message

To Whom It May Concern,

(images of some examples attached below for reference and handwriting comparison)

I am writing to formally request an immediate investigation into the fraudulent mailings I have been receiving, which appear to involve someone impersonating a government agency. For nearly two years, I have been receiving letters that falsely represent the Louisiana Department of Children and Family Services (DCFS) and specifically claim to be from my caseworker, Charde Carter. These mailings contain threats and financial demands, and I believe they are part of a deliberate attempt to defraud me and mislead others. I emailed my case worker directly and received no response.

The letters, which include what appear to be forged signatures, have caused significant confusion, including errors in my child support payments and miscommunications with school officials. Furthermore, I am concerned about the legality of these mailings, which include handwritten language, unauthorized postage, and inconsistent instructions compared to the official DCFS communications I have received.

For your reference, I am including the relevant legal citations related to fraudulent impersonation:

U.S. Code Title 18, Crimes and Criminal Procedure, Section 912.
False Personation of an Officer or Employee of the United States

- **§912** states that anyone who falsely assumes or pretends to be an officer or employee acting under the authority of the United States or any department, agency, or officer thereof is subject to fines or imprisonment for up to three years.

In my case, it appears someone is unlawfully impersonating an official from the Louisiana DCFS, possibly with the intent to redirect child support payments to incorrect addresses or cause other financial harm. I have received mail that does not meet the standard mailing procedures set forth by DCFS. Additionally, the handwriting on the envelopes and documents matches that of the custodial parent on my case, Charmaine Y. Colston. I have previously notified my caseworker, Charde Carter, about these harassing and fraudulent actions, including concerns regarding Ms. Colston's history of identity theft and forgery.

The documents in question contain inconsistencies, such as handwritten instructions and pre-paid postage stickers, which do not align with DCFS's official mailing procedures. As per standard procedure, all mail sent by DCFS should follow a uniform format, be pre-approved, and adhere to specific mailing protocols. The mail I have received, however, fails to meet these criteria and often contains unapproved postage and language that is not authorized by DCFS.

Additionally, threats of jail time and legal consequences have been included in some of these mailings, further adding to my distress. These communications have also been sent to my wife's tenants' address in New Jersey, further complicating the situation and exacerbating the harm caused by these actions.

To protect my rights and prevent further financial and emotional harm, I request that this matter be escalated to the investigations department immediately. I also ask that you review the attached correspondence and the attached images for a thorough evaluation of the fraudulent activities. Specifically, I seek an investigation to determine:

1. **The identity of the person(s) responsible for sending these fraudulent mailings.**
2. **Verification of the authenticity of the mailings in question.**
3. **An investigation into how this person may have obtained access to sensitive case information.**
4. **A review of the missing payments and any discrepancies in my child support account caused by these fraudulent actions.**
5. **An assessment of any potential impact on school officials, attorneys, and others who have been misled by these false communications.**

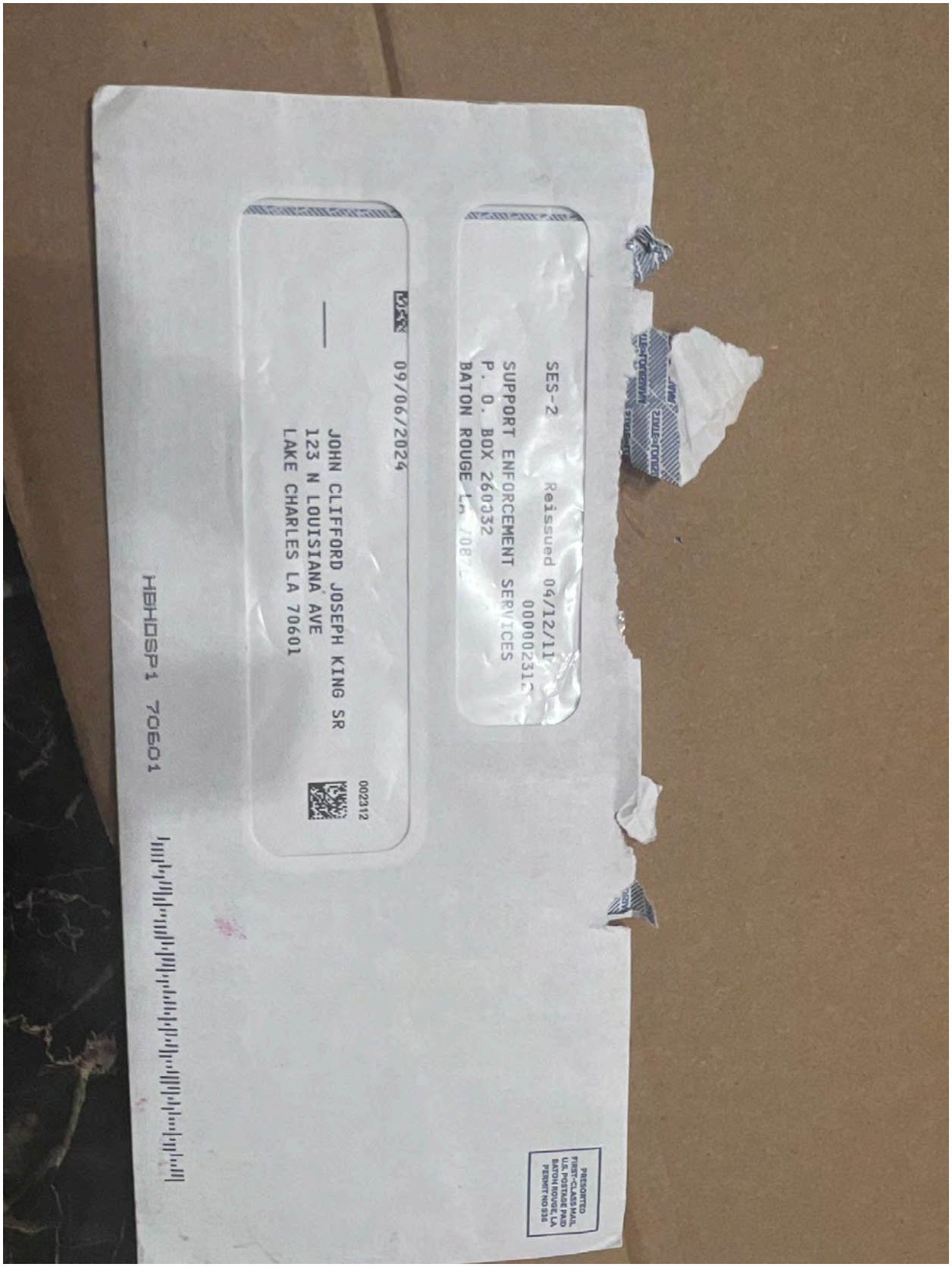
Please advise on the steps DCFS will take to resolve this issue and ensure that all future communications are handled according to the agency's standards. I expect an urgent response to this matter and request that this issue be escalated to a supervisor in the investigations department.

I trust that you will take immediate action to resolve this issue and prevent any further harm caused by these fraudulent communications. Please contact me at **John King Sr.**, located at **123 N. Louisiana Avenue, Lake Charles, LA**, via email at **johncjking86@gmail.com** or by phone at **318-995-1705**.

Thank you for your attention to this serious matter. I look forward to your prompt response.

Sincerely,
John King Sr.
123 N. Louisiana Avenue
Lake Charles, LA
Email: johncjking86@gmail.com
Phone: 318-995-1705


BATON ROUGE LA 707
19 JAN 2024 PM
US POSTAGE
$000.63
Lake Charles, LA 70615
John King
123 N Louisiana Ave
Lake Charles, LA 70615
70601-225123


PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
BATON ROUGE LA
PERMIT NO 938
SES-2
Reissued 04/12/11
00000231
SUPPORT ENFORCEMENT SERVICES
P. O. BOX 260332
BATON ROUGE
09/06/2024
002312
JOHN CLIFFORD JOSEPH KING SR
123 N LOUISIANA AVE
LAKE CHARLES LA 70601
HBHOSP1 70601


Department of Children & Family Services
Building a Stronger Louisiana
Child Support Enforcement
Lake Charles Region
P.O. Box 16777
Lake Charles, LA 70616
John King Sr.
123 N. Louisiana Ave
Lake Charles, LA 70615
BATON ROUGE LA
7 AUG 2024 PM
US POSTAGE
$ 000.69
John King Sr
123 N Louisiana Ave
Lake Charles, LA 70615
70601-225123
BATON ROUGE
24 MAY 2024
John King Sr
123 Louisiana Ave
Lake Charles, LA 70615
70601-322323
BATON ROUGE
22 MAY 2024
US POSTAGE
$ 000.64

SUPERIOR COURT OF NEW JERSEY
ESSEX VICINAGE PROBATION SERVICES

60 Evergreen Place, 7th Floor, East Orange, New Jersey 07018
Tel: (973) 776-9300 / Fax: (973) 766-9213
TTY/TTD (voice) dial 711 for New Jersey Relay Service

Ana C. Rivera
Probation Division Manager

Okey Emenuga, Katra Charlemagne
Assistant Probation Division Managers

Child Support Enforcement Services
PO Box 372, Newark, New Jersey 07101-0372
Tel:(877)-655-4371 / Fax (973) 424 - 2401

FAX TRANSMISSION

TO:	OLIVER SCHRUMPF, ESQ.	**DATE:**	03/27/25
FAX NO.:	(337) 625 - 8231	**NO. OF PAGES:**	4 (incl. Cover Sheet)
FROM:	Chiaka O. Judgment Coordinator	**WORKER ID NO.:**	
SUBJECT:	KING, JOHN CLIFFORD JOSEPH	**WORKER TEL. NO.:**	(877) 655 - 4371

COMMENTS: **Please see faxed information. Should you require additional assistance, contact customer service at (609) 421 – 6100 or fax at (973) 424 – 6815.**

Confidentiality Notice
The information contained in this facsimile transmission may be confidential and intended for the sole use of the persons or entities named on this transmittal sheet. If you are not the intended recipient, you are hereby notified that any disclosure, distribution, copying or use of the information it contains is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone.

SUPERIOR COURT OF NEW JERSEY
ESSEX VICINAGE PROBATION SERVICES
60 Evergreen Place, 7th Floor, East Orange, New Jersey 07018
Tel: (973) 776-9300 / Fax: (973) 766-9213
TTY/TTD (voice) dial 711 for New Jersey Relay Service

Ana C. Rivera
Vicinage Chief Probation Officer

Child Support Enforcement Services
PO Box 372, Newark, New Jersey 07101-0372
Tel: (877) 655-4371 / Fax: (973) 424-2401

Okey Emenuga , Katra Charlemagne
Vicinage Assistant Chief Probation Officers

Re: King, John Clifford Joseph
Child Support Case #: CS91774910A
Judgment #: J-024724-25
SS#: XXX-XX-1934
DOB: 04/17/1986

Dear Oliver Schrumpf, Esq.:

This letter is in response to your inquiry regarding the above child support case. According to the records of the New Jersey Child Support System, the current arrears due on the account as of 3/27/25 is **$33,186.11.**

If remitting payments, please make check/checks payable to - New Jersey Family Support Payment Center and mail to:

New Jersey Family Support Payment Center

Attn: Judgments and Writs

P.O. Box 55058

Trenton N.J. 08638

Should you require additional assistance, you may reach our office at (877) 655-4371 or via fax at (973) 424 – 6815.

Sincerely,

/s/ Chiaka Ofuya

Chiaka Ofuya
Judgment Coordinator / SPO

CSE 433
Rev. 12/13
07/12 Issue Obsolete
Rec. Ret. = 4CY

Louisiana Department of Children and Family Services
Child Support Enforcement Section

_____

_____

_____

Telephone

_____

Date

NOTICE OF ASSIGNMENT – LUMP SUM

Obligor: JOSEPH CLIFFORD JOHN KING
Docket No.: FJ-07-001941-25
LASES No.: _____
NCP's SSN: XXX-XX-1934

To the Payor of Income:

The above named obligor was ordered to pay $ 1,010.00 per MONTH for support. Our records indicate that as of this date the obligor owes $ 33,186.11 in past due support. Under LA R.S. 46:236.3, Child Support Enforcement is entitled to an income assignment.

In accordance with LA R.S. 46:236.3, you are hereby notified that the past due support is to be withheld from any payments due the obligor, including but not limited to bonuses, judgments, settlements, annuity, and retirement benefits. This notice shall remain in effect until further notice.

Please be advised that this does not relieve the obligor of any unpaid arrears owed in the child support case.

Make check payable to: Department of Children and Family Services. Send check to: Centralized Collection Unit. Address: P. O. Box 260222, Baton Rouge, LA 70826.

Note: Any monies not subject to withholdings (i.e., F.I.C.A., federal and state taxes, etc.) should not be subject to the 50% limitation as found in LA R.S. 13:3881(a)(1).

If you have any questions, please contact this office.

Sincerely yours,

CHIAKA OFUYA, SPO | JC
Department Representative

(877) 655-4371
Telephone

ESSEX COUNTY
Probation Division, Child Support Enforcement
PO BOX 372
CHILD SUPPORT ENF UNIT
NEWARK, NJ 07101-0372
Website: www.njchildsupport.org

(877)655-4371
Fax: (973)776-9933

COLSTON CHARMAINE YVETTE
Plaintiff [X] Obligee [ ] Obligor

vs.

KING JOHN CLIFFORD JOSEPH
Defendant [ ] Obligee [X] Obligor

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART

Docket Number: **FD-07-001941-25**
Case ID: **CS91774910A**

CIVIL ACTION CERTIFICATION OF ARREARS

The undersigned certifies that the records of the **ESSEX COUNTY** Probation Division indicate the obligor:

(1) Was ordered by the Superior Court of New Jersey, on **07/01/2024** to pay $ **1226.67 MONTHLY** as support and / or arrears payments.

(2) Has failed to make payments. Arrears / Credit as of **03/27/2025** are:

$ **33,186.11** to the obligee

Total due $ **33,186.11***

*Post judgment interest may be due from the obligor on the case.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Dated: **03/27/2025**

NORMA RIVERA
SENIOR PROBATION OFFICER

Re: FW: King

From: True King <truekingfile@gmail.com>

To: Jinnifer LeBlanc <Jleblanc@schrumpf-law.com>

Date: Thu, 03 Apr 2025 17:12:35 -0400

Attachments:
IMG_5220.jpeg

Spoke to case officer in NJ they said Child Services has in no way reached out to any attorney in Louisiana.

She says they sent no faxes and made no calls because it’s not in jurisdiction and a judge has not signed a court order.

We made it clear regardless of the fact that her arrears do not exist and after outstanding legal fees and court costs / appeals/ filings etc nothing will be left over anyway. and after deductions of past payments made she actually owes $800.

Thanks

On Fri, Mar 28, 2025 at 11:37 AM True King <truekingfile@gmail.com> wrote:

> This is a lie and is being appealed in court. She’s trying to illegally
> intercept his winnings. Please see the attached appeals and this case is
> now being fought in NJ to transfer it back to Louisiana.
>
> She must subtract everything paid from
> Date of judicial demand which is 07/18/2021 King has paid $63,000.00 in CS
> since 2021.
>
> There is currently no enforcement jurisdiction active until the case is
> closed and we just had to hire representation to fight the lie.
>
> This is ridiculous
> See attached Both attachments.
> She is harassing for entirely no reason.
>
> On Fri, Mar 28, 2025 at 11:18 AM Jinnifer LeBlanc <
> jleblanc@schrumpf-law.com> wrote:
>
>>
>>
>>
>>
>> *From:* Oliver Schrumpf <oschrumpf@schrumpf-law.com>
>> *Sent:* Thursday, March 27, 2025 5:16 PM
>> *To:* Jinnifer Marcantel <jleblanc@schrumpf-law.com>

>> *Subject:* FW: King
>>
>>
>>
>> You may send this to Mr. King, but unless they seize his interest in
>> the judgment (assuming we eventually win) we will not be doing anything
>> about this (unless Mr. King asks us to pay his part of the winnings
>> toward his child support obligations
>>
>>
>>
>> *From:* Jinnifer LeBlanc <jleblanc@schrumpf-law.com>
>> *Sent:* Thursday, March 27, 2025 3:46 PM
>> *To:* Oliver Schrumpf <oschrumpf@schrumpf-law.com>
>> *Subject:* King
>>
>>
>>
>> I had gotten a call from someone (I have in my notes) this week saying
>> that someone informed them that we represented Mr. King.
>>
>>
>>
>> So here is what he owes for child support arears.
>>
>>
>>
>> Thank you,
>>
>> Jinnifer Marcantel
>>
>> Paralegal to Oliver “Jackson” Schrumpf
>>
>>
>>
>> Schrumpf Law Office, PLC
>>
>> 3801 Maplewood Drive
>> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA+70663?entry=gmail&source=g>
>>
>> Sulphur, LA 70663
>> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA+70663?entry=gmail&source=g>
>>
>> (337) 625-9077

>>
>> (337) 625-8231 (fax)
>>
>>
>>
>> ***If you have not executed a binding fee agreement or an agreement for
>> representation, this firm does not represent you and this email is not an
>> agreement of representation.***
>>
>>
>>
>> ****Please note that unless expressly stated otherwise, I have NOT
>> expressly designated my email address as appropriate for electronic service
>> of a pleading or other writing under LA CCP 1313.****
>>
>>
>>
>> *Confidentiality Statement: *This e-mail transmission, and any
>> documents, files, or e-mail messages attached to it, may contain
>> confidential information that is attorney work product and/or legally
>> privileged. The information herein is also protected by the Electronic
>> Communications Privacy Act, 18 U.S.C.A. 2510-2521. The information
>> contained in this message and any file transmitted with it is transmitted
>> in this form based upon a reasonable expectation of privacy consistent with
>> ABA Formal Opinion No. 99-413. If you are not the intended recipient, or
>> the person responsible for delivering it to the intended recipient, you are
>> hereby notified that any disclosure, copying, distribution or use of any of
>> the information contained in or attached to this transmission is STRICTLY
>> PROHIBITED. If you have received this transmission in error, please notify
>> sender immediately via return email or by telephone at (337) 625-9077 and
>> destroy the original transmission and its attachments without reading them
>> or saving them to disk or otherwise. Thank you.
>>
>>
>>
>>
>>
>>
>>
>>
>>
>

ESSEX COUNTY
CHANCERY DIVISION, FAMILY PART
212 WASHINGTON ST FL 13
WILENTZ JUDICIAL COMPLEX
NEWARK , NJ 07102-2990
Website: www.njchildsupport.org

(877)655-4371
Fax:

COLSTON CHARMAINE YVETTE
Plaintiff
vs.
KING JOHN CLIFFORD JOSEPH
Defendant

Docket: **FD-07-001941-25**
Case ID: **CS91774910A**

JOHN C. KING SR
8 LOMBARDY ST # 197
NEWARK , NJ07102-3210
US

Notice of Hearing
Registration of Out of State Support Order

Please be advised that the above captioned matter has been scheduled for:

☐ Determination of Controlling Order.
☐ Objection to a Registration of a Foreign (Out of State) Order.

This hearing is scheduled for 03/27/2025 at 10:30 AM and will be conducted:

☐ **In Person**

Go to the courthouse for this hearing.

REPORT TO: HEARING ROOM 3, ROOM 1126 212 WASHINGTON ST RM 1126, , HEARING RM 3, 11TH FL NEWARK , NJ 07102-2990

Directions: www.njchildsupport.org

Not appearing for this hearing will result in the registration of the order without further notice.

NOTE FOR OBLIGORS WITH ACTIVE BENCH WARRANTS: Please note that if you have an active bench warrant appear at this hearing, the court will be required to address the warrant and you may be subject to immediate arrest. avoid immediate arrest by paying the full amount of the child support arrears and/or providing health care coverage prior to the hearing.

RE: FW: King

From: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

To: True King <truekingfile@gmail.com>

Date: Wed, 23 Apr 2025 16:55:11 -0500

The appeal hearing is May 6th. Mr. Schrumpf said we should have a decision within the week after. I will let you know as soon as we get it.

Jinnifer

From: True King <truekingfile@gmail.com>
Sent: Wednesday, April 23, 2025 3:39 PM
To: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>
Subject: Re: FW: King

Ms Leblanc

May I have an update?

On Thu, Apr 3, 2025 at 6:04 PM Jinnifer LeBlanc <jleblanc@schrumpf-law.com> wrote:

Thank you!

From: True King <truekingfile@gmail.com>
Sent: Thursday, April 3, 2025 4:13 PM
To: Jinnifer LeBlanc <Jleblanc@schrumpf-law.com>
Subject: Re: FW: King

Spoke to case officer in NJ they said Child Services has in no way reached out to any attorney in Louisiana.

She says they sent no faxes and made no calls because it’s not in jurisdiction and a judge has not signed a court order.

We made it clear regardless of the fact that her arrears do not exist and after outstanding legal fees and court costs / appeals/ filings etc nothing will be left over anyway. and after deductions of past payments made she actually owes $800.

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Date of judicial demand which is 07/18/2021 King has paid $63,000.00 in CS since 2021.

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Sent: Thursday, March 27, 2025 5:16 PM
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Subject: FW: King

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From: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>
Sent: Thursday, March 27, 2025 3:46 PM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>
Subject: King

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So here is what he owes for child support arears.

Thank you,

Jinnifer Marcantel

Paralegal to Oliver “Jackson” Schrumpf

Schrumpf Law Office, PLC

3801 Maplewood Drive
<https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA+70663?entry=gmail&source=g>

Sulphur, LA 70663
<https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA+70663?entry=gmail&source=g>

(337) 625-9077

(337) 625-8231 (fax)

If you have not executed a binding fee agreement or an agreement for representation, this firm does not represent you and this email is not an agreement of representation.

****Please note that unless expressly stated otherwise, I have NOT expressly designated my email address as appropriate for electronic service of a pleading or other writing under LA CCP 1313.****

*Confidentiality Statement: *This e-mail transmission, and any documents, files, or e-mail messages attached to it, may contain confidential information that is attorney work product and/or legally privileged. The information herein is also protected by the Electronic Communications Privacy Act, 18 U.S.C.A. 2510-2521. The information contained in this message and any file transmitted with it is transmitted in this form based upon a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. If you are not the intended recipient, or the person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify sender immediately via return email or by telephone at (337) 625-9077 and destroy the original transmission and its attachments without reading them or saving them to disk or otherwise. Thank you.

Urgent Attention Mail Fraud DCFS 11.20.2024

From: John King <johncjking86@gmail.com>

To: LAHelpU.DCFS@la.gov

Bcc: truekingfile@gmail.com

Date: Wed, 20 Nov 2024 13:21:32 -0600

Attachments:
Mail Fraud DCFS 11.20.2024.pdf

Please find attached to the urgent attention of the investigations unit my letter reporting what appears to be mail fraud and someone pretending to be DCFS office has been sending mail asking for money and making threats in handwritten letters in what appears to be my co parents hand writing.

Please confirm that appropriate unit has been notified.
Thank You
John C King Sr
Case # 380702-01
(Enclosure Letter Attached as PDF)

To Whom It May Concern,

(images of some examples attached below for reference and handwriting comparison)

I am writing to formally request an immediate investigation into the fraudulent mailings I have been receiving, which appear to involve someone impersonating a government agency. For nearly two years, I have been receiving letters that falsely represent the Louisiana Department of Children and Family Services (DCFS) and specifically claim to be from my caseworker, Charde Carter. These mailings contain threats and financial demands, and I believe they are part of a deliberate attempt to defraud me and mislead others. I emailed my case worker directly and received no response.

The letters, which include what appear to be forged signatures, have caused significant confusion, including errors in my child support payments and miscommunications with school officials. Furthermore, I am concerned about the legality of these mailings, which include handwritten language, unauthorized postage, and inconsistent instructions compared to the official DCFS communications I have received.

For your reference, I am including the relevant legal citations related to fraudulent impersonation:

U.S. Code Title 18, Crimes and Criminal Procedure, Section 912.
False Personation of an Officer or Employee of the United States

- **§912** states that anyone who falsely assumes or pretends to be an officer or employee acting under the authority of the United States or any department, agency, or officer thereof is subject to fines or imprisonment for up to three years.

In my case, it appears someone is unlawfully impersonating an official from the Louisiana DCFS, possibly with the intent to redirect child support payments to incorrect addresses or cause other financial harm. I have received mail that does not meet the standard mailing procedures set forth by DCFS. Additionally, the handwriting on the envelopes and documents matches that of the custodial parent on my case, Charmaine Y. Colston. I have previously notified my caseworker, Charde Carter, about these harassing and fraudulent actions, including concerns regarding Ms. Colston's history of identity theft and forgery.

The documents in question contain inconsistencies, such as handwritten instructions and pre-paid postage stickers, which do not align with DCFS's official mailing procedures. As per standard procedure, all mail sent by DCFS should follow a uniform format, be pre-approved, and adhere to specific mailing protocols. The mail I have received, however, fails to meet these criteria and often contains unapproved postage and language that is not authorized by DCFS.

Additionally, threats of jail time and legal consequences have been included in some of these mailings, further adding to my distress. These communications have also been sent to my wife's tenants' address in New Jersey, further complicating the situation and exacerbating the harm caused by these actions.

To protect my rights and prevent further financial and emotional harm, I request that this matter be escalated to the investigations department immediately. I also ask that you review the attached correspondence and the attached images for a thorough evaluation of the fraudulent activities. Specifically, I seek an investigation to determine:

1. **The identity of the person(s) responsible for sending these fraudulent mailings.**
2. **Verification of the authenticity of the mailings in question.**
3. **An investigation into how this person may have obtained access to sensitive case information.**
4. **A review of the missing payments and any discrepancies in my child support account caused by these fraudulent actions.**
5. **An assessment of any potential impact on school officials, attorneys, and others who have been misled by these false communications.**

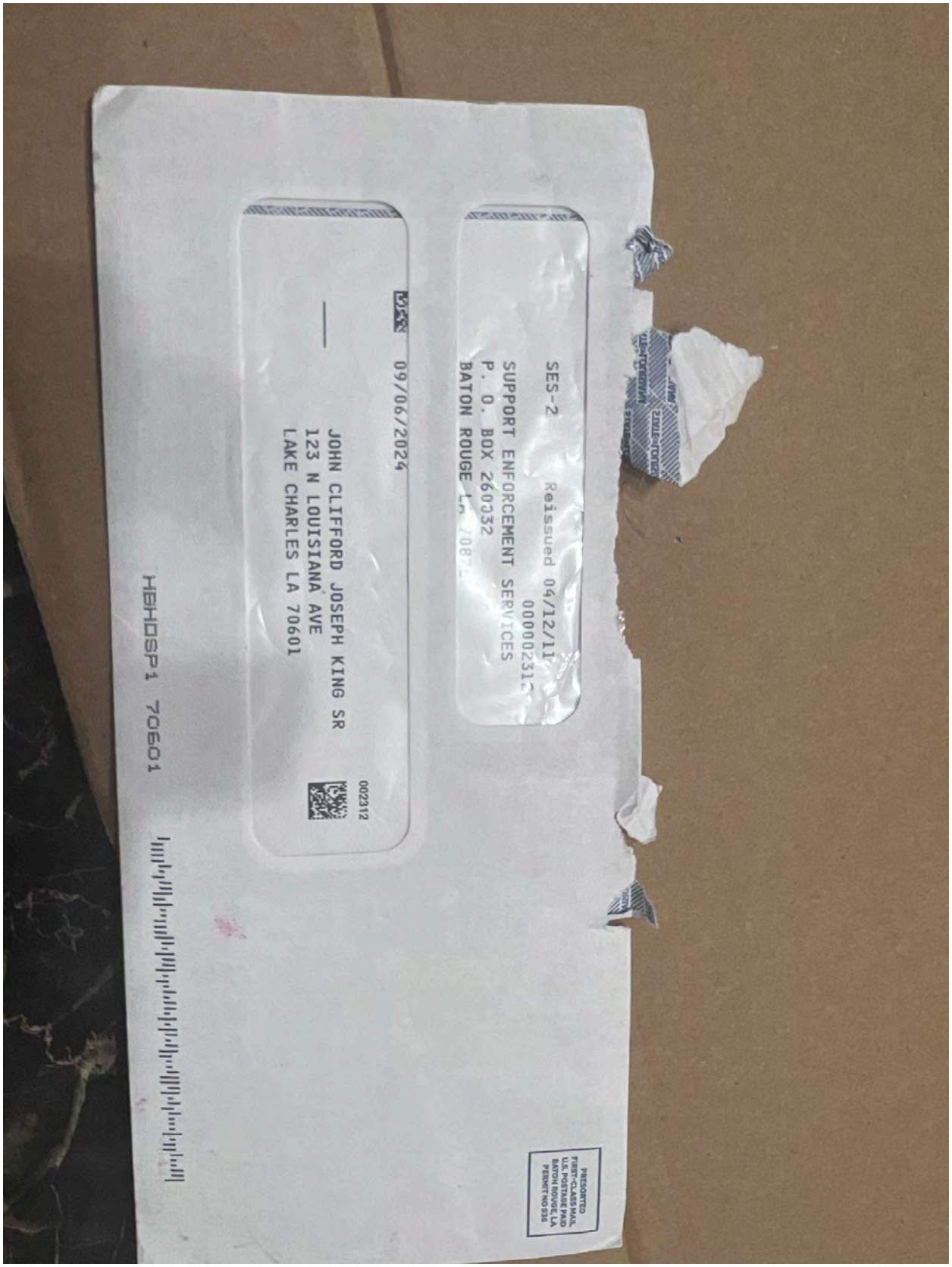
Please advise on the steps DCFS will take to resolve this issue and ensure that all future communications are handled according to the agency's standards. I expect an urgent response to this matter and request that this issue be escalated to a supervisor in the investigations department.

I trust that you will take immediate action to resolve this issue and prevent any further harm caused by these fraudulent communications. Please contact me at **John King Sr.**, located at **123 N. Louisiana Avenue, Lake Charles, LA**, via email at **johncjking86@gmail.com** or by phone at **318-995-1705**.

Thank you for your attention to this serious matter. I look forward to your prompt response.

Sincerely,
John King Sr.
123 N. Louisiana Avenue
Lake Charles, LA
Email: johncjking86@gmail.com
Phone: 318-995-1705


BATON ROUGE LA 707
19 JAN 2024 PM
US POSTAGE
$000.63
Lake Charles, LA 70615
John King
123 N Louisiana Ave
Lake Charles, LA 70615
70601-225123


PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
BATON ROUGE LA
PERMIT NO 938
SES-2
Reissued 04/12/11
00000231
SUPPORT ENFORCEMENT SERVICES
P. O. BOX 260332
BATON ROUGE
09/06/2024
002312
JOHN CLIFFORD JOSEPH KING SR
123 N LOUISIANA AVE
LAKE CHARLES LA 70601
HBHOSP1 70601


Department of Children & Family Services
Building a Stronger Louisiana
Child Support Enforcement
Lake Charles Region
P.O. Box 16777
Lake Charles, LA 70616
John King Sr.
123 N. Louisiana Ave
Lake Charles, LA 70615
BATON ROUGE LA
7 AUG 2024 PM
US POSTAGE
$ 000.69
John King Sr
123 N Louisiana Ave
Lake Charles, LA 70615
70601-225123
BATON ROUGE
24 MAY 2024
John King Sr
123 Louisiana Ave
Lake Charles, LA 70615
70601-322323
BATON ROUGE
22 MAY 2024
US POSTAGE
$ 000.64

COST DISCREPANCY ANALYSIS
Lake Charles City Court

Category	**Case No. 23-2124** **King v. Amos**	**Case No. 23-1206** **King v. Colston**
Early 2024 Baseline Costs	February 23, 2024 certified copy request: $29.00 [1]	Routine filing and service fees only; no comparable escalation
November 14 and December 30, 2024 Activity	Approximately $5,000.00 imposed December 30, 2024 [2] $800.00 transcript charge [3]	No comparable single day cost spike
Service and Address Entries	Service fees entered at Iowa, Louisiana address under 'Shunte King' [4]	Standard service entries; no address irregularity reflected

Footnotes:

[1] February 23, 2024 entry: Request for certified copies, total cost $29.00.

[2] Cost ledger reflects approximately $5,000.00 assessed December 30, 2024 in Case No. 23-2124.

[3] Transcript preparation fee of $800.00 reflected in cost bill.

[4] Service entries reflect Iowa, Louisiana address not associated with domicile, raising equity concerns under La. C.C.P. art. 1920.

COST DISCREPANCY ANALYSIS
Lake Charles City Court

Category	Case No. 23-2124 King v. Amos	Case No. 23-1206 King v. Colston
Early 2024 Baseline Costs	February 23, 2024 certified copy request: $29.00 [1]	Routine filing and service fees only; no comparable escalation
November 14 and December 30, 2024 Activity	Approximately $5,000.00 imposed December 30, 2024 [2] $800.00 transcript charge [3]	No comparable single day cost spike
Service and Address Entries	Service fees entered at Iowa, Louisiana address under 'Shunte King' [4]	Standard service entries; no address irregularity reflected

Footnotes:

[1] February 23, 2024 entry: Request for certified copies, total cost $29.00.

[2] Cost ledger reflects approximately $5,000.00 assessed December 30, 2024 in Case No. 23-2124.

[3] Transcript preparation fee of $800.00 reflected in cost bill.

[4] Service entries reflect Iowa, Louisiana address not associated with domicile, raising equity concerns under La. C.C.P. art. 1920.

Your case may be heard in-person or remotely. To find out how your Final Restraining Order will be held, upon receipt of this order, you must immediately contact the Family court. For your convenience, all county Family Court numbers are listed below. All restraints remain in full force and effect until the final hearing.

Family Court County Phone Numbers

Atlantic	609-402-0100 x47580
Bergen	201-221-0700 x25185
Burlington	609-288-9500 x38834
Cape May	609-402-0100 x47710
Camden	856-650-9100 x43520
Cumberland	856-878-5050 x15640
Essex	973-776-9300 x57210
Gloucester	856-878-5050 x15520
Hudson	201-748-4400 x60830 201-748-4400 x60810
Hunterdon	908-824-9750 x13350
Mercer	609-571-4200 x74402
Middlesex	732-645-4300 x88560
Monmouth	732-358-8700 x87211 732-358-8700 x87160
Morris	862-397-5700 x75250
Ocean	732-504-0700 x64090
Passaic	973-653-2910 x24624
Salem	856-878-5050 x15881
Somerset	908-332-7700 x13007
Sussex	862-397-5700 x75184
Union	English: 908-787-1650 x21710 Spanish: 908-787-1650 x21720
Warren	908-750-8100 x13480

Go to "https://www.njcourts.gov/forms/12751_prepare_dvtro_hearing.pdf?c=0LD" to view "Preparing for a Domestic Violence Final Restraining Order Hearing" instructions.

New Jersey Judiciary
Family Practice Division

Preparing for a Domestic Violence Final Restraining Order Hearing

The information in this document provides basic, consistent information and guidance to both the plaintiff and defendant on what to expect when attending a Final Restraining Order (FRO) hearing. The information was combined under one document because some of the material concerns both parties. In addition, in the interest of transparency, each party will know what information is given to the other.

Once a domestic violence Temporary Restraining Order (TRO) is granted by a Superior Court or Municipal Court judge, a FRO hearing is scheduled before a Family judge in the Superior Court. Both the plaintiff and defendant will need to prepare for FRO hearing. In this court, domestic violence cases are civil cases and not criminal offenses. In these cases, the court will apply the civil standard or burden of proof rather that the criminal standard of proof which is beyond a reasonable doubt. The burden of proof in these cases is by the preponderance of the evidence. This means the person must show evidence to prove their claim and the level of evidence they must show to do so (*the civil standard* requires a 51% or greater probability while *the criminal standard* requires closer to 100%). The plaintiff (the person who filed the TRO application) has the burden of proof at the FRO hearing.

You **must** attend the final hearing. You have the right to bring an attorney; the court cannot provide an attorney for you.

If you are the plaintiff, you must attend the final hearing, even if you decide to dismiss the restraining order. The FRO hearing might take place remotely over a video platform, such as Zoom or Teams (see Domestic Violence Remote Hearing Instruction Sheet for Litigants), or you might be asked to appear in person at the courthouse. If you need to amend only your complaint, prior to the FRO hearing, you may file an Application to Amend Domestic Violence Complaint and submit the amended complaint through the Judiciary Electronic Document System (JEDS). If you need to amend the order prior to the FRO hearing please contact the Family Division where your case is being heard.

You will need to prepare yourself, and any witnesses you might have for the FRO hearing. If you have any evidence you wish to present at the hearing, for example, photos, text messages, video, etc. you must contact the court prior to the hearing for instructions on providing this evidence.

- Children should not be brought to the final hearing unless otherwise instructed by a judge to do so. If you have children and are going to ask the court for child support, please bring or have available your most recent pay stub, childcare costs, and tax return.
- If you are unemployed and receiving benefits from employment or disability, please bring proof.
- Failure to appear at your scheduled time might result in your case being postponed to another day and/or time, or your case might be dismissed.

If you are the defendant, you must attend the hearing even if the plaintiff is going to dismiss the restraining order. This hearing might take place remotely over a video platform, such as Zoom or Teams (see Domestic Violence Remote Hearing Instruction Sheet for Litigants), or you might be asked to appear in person at the courthouse. If you wish to appeal your TRO you may file an Application for Appeal and Order.

You will need to prepare yourself, and any witnesses you might have for the hearing. If you have any evidence you wish to present at the hearing, for example, photos, text messages, video, etc. you must contact the court prior to the hearing for instructions on providing this evidence.

- Children should not be brought to the final hearing unless otherwise instructed by a judge to do so. If you have children, child support might be ordered in the restraining order. Please bring or have available your most recent pay stub and tax return.
- If you are unemployed and receiving benefits from employment or disability, please bring proof.
- **Failure to appear at your scheduled time will likely result in the court proceeding without you and an FRO being entered against you**.

If You Are the Defendant, It Is Important You Read This Section

If an FRO is entered against you, you should be aware that there are **significant penalties** that will be imposed automatically.

- Your name **will** be kept in a domestic violence central registry. This can affect your employment affect your housing, prevent you from being a resource/foster parent, or affect a professional license.
- You **will** be fingerprinted and fined up to $500.
- You **will** be barred from where the plaintiff lives and works and possibly barred from additional locations and/or additional people (for example, plaintiff's relatives).
- Your parenting time with your child(ren) **might** be affected and you **might** be ordered to participate in court ordered services such as attendance at a batterer's intervention program, submitting to a substance abuse evaluation, or submitting to a psychological/psychiatric evaluation.
- You **will not** be permitted to possess any weapon, ID card, or purchase permit while the FRO is in effect, or for two years, whichever is greater.

Whether you are the plaintiff or defendant, you will have the opportunity to present their case to the court. During the FRO hearing, you will give information (called "*evidence*") to a judge who will decide your case. The judge is the finder of fact; there is no jury in these cases. Evidence that you can present includes information you or someone else tells the judge ("*testimony*") as well as items like email and text messages, documents, photos, and objects ("*exhibits*").

If you do not have an attorney, you will need to collect and present your evidence in the proper way. Courts have rules about evidence so that judges will make decisions based on facts, not gossip and guesswork. The court will allow you to present witnesses, as well as ask questions of the other person and their witnesses (called "*cross-examination*"). Although the rules can be confusing, they are designed to protect your rights, and you can use them to help prepare for your court appearance.

The judge's decision on whether to enter an FRO is based on the information that is provided, so you should come prepared with any evidence you have. Examples of evidence that the judge might accept are:

- your testimony, which should include details regarding the date, location, and specific details of the incident,
- photos of visible injuries and/or property damage,
- copies of police, medical and/or dental reports,
- threatening or harassing letters or text messages,

- threatening messages from answering machines or voicemail,
- financial documents, if seeking financial support, and/or
- witnesses.

Once an FRO is granted, it does not expire. The order remains in effect **forever** unless it is dismissed by the court.

- The plaintiff can request a dismissal in person at the courthouse or by calling the court.
- The defendant can also request a dismissal but would need to file a motion using our packet CN 12420 - How to Ask the Court to Dismiss a Final Restraining Order found on njcourts.gov.

The entry of the FRO is independent of any possible criminal charge that might have also been filed, and this court's issuance of an FRO will not affect those proceedings. However, a violation of the contact provisions of an FRO is a crime for which the defendant could be arrested and charged criminally.

Ways to Find Help with Your Case

Work with a Domestic Violence Advocate

If you are the plaintiff, you can reach out to a domestic violence advocate. A domestic violence advocate is a person who works at your local domestic violence program. Advocates are knowledgeable and can offer specialized domestic violence support and information. They can provide information about services near you, like where to find a lawyer or legal assistance, how to find counseling for you or your children, where to find a shelter or help with housing, and recommend a place that can supervise the defendant's parenting time.

A domestic violence advocate cannot be your lawyer; however, they can go with you to court to provide support. They can also help you prepare for your hearing, including helping you connect remotely to the hearing, and might know about lawyers who are willing to take cases at no charge or low cost (legal aid services).

Even if you have a lawyer, working with a domestic violence advocate can still be helpful. They might know more about domestic violence than your lawyer They can help you make a safety plan. You can find an advocate by asking at the local courthouse or contacting the NJ Coalition to End Domestic Violence njcedv.org.

Use Legal Referral Services

If you cannot afford a lawyer, you may contact the legal services program in your county to see if you qualify for free legal services. Their telephone number can be found online under "Legal Aid" or "Legal Services." If you do not qualify for free legal services and need help in locating an attorney, you can contact the bar association in your county. Most county bar associations have a Lawyer Referral Service.

If you can hire a lawyer, take the time to interview several lawyers before hiring one. Make sure to ask the lawyer about the fee for representing you and what you can expect. Ask any lawyer you interview about their other cases with domestic violence as it is in your best interest to find a lawyer with knowledge about domestic violence.

For an explanation of New Jersey law about domestic violence and suggestions of some of the measures you can take to protect yourself from abuse, including using the Prevention of Domestic Violence Act to get a restraining order to keep the abuser away, visit the Legal Services of New Jersey (LSNJ) website (https://www.lsnjlaw.org/Family-Relationships/Pages/default.aspx#). The title of the guide is "*Domestic Violence - A Guide to the Legal Rights of Domestic Violence Victims in New Jersey*".

Ask at Your Local Courthouse

Court staff *cannot* give you legal advice because they must be neutral and impartial; however, they *can* help you find self-help resources and answer questions about filing papers, setting a hearing or general court procedures. You can find a listing of each county's phone number on the Family Division page listed under *Domestic Violence Resources*/County Phone Numbers for Temporary Restraining Orders.

Additional assistance is available at the courthouse from the ombudsman. In the Judiciary, the ombudsman is a neutral staff person who answers questions, addresses concerns from the public and is responsible for enhancing customer service in the courts. The Ombudsman can also offer referral information to other available resources. They may have contact information about pro bono and legal services organizations. A contact list for the Ombudsmen can be found here: Self-Help Center/Find Local Ombudsman…/Local Ombudsman Contact List

For additional information about domestic violence visit the Family Division page on njcourts.gov.

Call Your Local Library

Public libraries do have a tool for online legal research, and can show people how to use it, so we can say that.

Options After the FRO is Entered

How to File an Appeal

An appeal is a written request asking a higher court to look at the decision of the judge and change that judge's decision. You must make a written request for an appeal **within 45 days** after the judge decided the case and signed an order in the Superior Court. If you want to file an appeal of a court order you can use our kit: CN 10837 - How to Appeal a Trial Court, Tax Court or State Agency Decision, found on njcourts.gov.

How to Change, Modify, or Enforce an FRO

Either **the plaintiff or defendant** can file to change How to Enforce or Request a Change of a Domestic Violence Restraining Order or Sexual Assault Survivor Protection Order. You can submit the completed forms through the Judiciary Electronic Document Submission (JEDS) system, or you can mail them to the courthouse. For information on using JEDS, see the JEDS self-help page.

If you are the plaintiff and the defendant has violated the restraining you should call 911.

My Case is Emergent (Emergent Application Order to Show Cause)

An emergent hearing in the family court is meant to protect children from substantial and permanent harm. You can file for an emergent hearing by filling out the Order to Show Cause for FM, FD and FV Dockets.

New Jersey Domestic Violence Civil Complaint and Temporary Restraining Order

☐ TRO ☑ Amended TRO

N.J.S.A. 2C:25-17 et seq.

☑ Superior Court, Chancery Division, Family Part, ESSEX County ☐ Municipal Court of

Docket Number	Police Case Number
FV-07-000817-22	C21039526

In the Matter of Plaintiff (Victim)	Plaintiff's Sex	Plaintiff's Date of Birth
KING JOHN C	☑ Male ☐ Female	04/17/1986

Defendant Information

Last Name	First Name	Initial	Defendant's Sex	Race
COLSTON	CHARMAINE		☐ Male ☑ Female	UNKNOWN

AKA	Defendant's Social Security Number	Date of Birth	Height	Weight
COLSTON CHARMAINE Y		11/30/1989	5 07	165

Home Address	City	State	Zip	Eye Color	Hair Color
4419 LAKE FAIRWAY DR , UNABLE TO FORWARD	LAKE CHARLES	LA	70601	BROWN	BLACK

Home Phone Number	Work Phone Number	Distinguishing Features (Scars, Facial Hair, Etc.)

Employer	Driver's License Number

Work Address	State	Driver's License Expiration Date

The undersigned complains that said defendant did endanger plaintiff's life, health or well being (give specific facts regarding acts or threats of abuse and the date(s) and time(s) they occurred; specify any weapons):

ON (Date)	AT (Time)	BY (Details; specify any weapons)
09/08/2021	09:20 PM	ON SEPTEMBER 8, 2021, JOHN CLIFFORD JOSEPH KING SR ENTERED THE THIRD POLICE PRECINCT TO FILE A DOMESTIC REPORT. MR. KING SR STATED HE HAS BEEN RECEIVING NUMEROUS HARASSING PHONE CALLS. EMAILS AND TEXT MESSAGES FROM HIS CHILDREN MOTHER, CHARMINE COLSTON IN VIOLATING OF A TEMPORARY RESTRAINING ORDER GRANTED TO MR.KING SR FROM THE PARISH OF CALSASIEU IN THE STATE OF LOUISIANA ON AUGUST 19, 2021 FROM JUDGE W. MITCHELL REDD. MR. KING SR STATED SINCE AUGUST 24, 2021 TO THE PRESENT, HE WAS RECEIVED NUMEROUS PHONE CALLS, TEXT AND EMAILS FROM MISS. COLSTON WHICH THREATENS MR. KING SR GIRLFRIEND'S SAFELY, THREATENING MR. KING SR. LIFE AND HIS RELATIONSHIP WITH THE CHILDREN SHARED BETWEEN THEM, AND AS WELL AS PRETENDING TO BE THE CHILDREN THAT ARE SHARED BY MR. KING SR AND MISS. COLSTON IN AN ATTEMPT BY MISS.COLSTON TO GET MR. KING SR TO CONTACT HER. MR.KING SR WAS ADVISED OF HIS DOMESTIC VIOLENCE VICTIMS RIGHTS WHICH INCLUDED THE AVAILABILITY OF OBTAINING A TEMPORARY RESTRAINING ORDER AND THE SERVICES OF A D.V.R.T. MEMBER. MR. KING SR ACCEPTED POLICE ASSISTANCE ON OBTAINING A TEMPORARY RESTRAINING ORDER. THE THIRD PRECINCT RECEIVED FROM MR. KING SR COPIES OF THE TRO FROM THE PARISH OF CALCASIEU TRO UNDER CASE NUMBER : 2021-002773, TEST MESSAGES, EMAILS AND CALL LOGS OF MISS. COLSTON NUMEROUS ATTEMPTS IN CONTACTING HIM. ALL WERE SUBMITTED. BWC RECORDED.

which constitute(s) the following criminal offenses(s): (Check all applicable boxes. Law Enforcement Officer: Attach *N.J.S.P.* UCR DV1 offense report(s)):

☐ Homicide	☐ Terroristic Threats	☐ Criminal Restraint	☐ Sexual Assault	☐ Lewdness	☐ Burglary	☑ Harassment
☐ Assault	☐ Kidnapping	☐ False Imprisonment	☐ Criminal Sexual Contact	☐ Criminal Mischief	☐ Criminal Trespass	☐ Stalking
☐ Criminal Coercion	☐ Robbery	☑ Contempt of a DV Order	☐ Any Other Crime Involving Risk of Death or Serious Bodily Injury			☐ Cyber Harassment

1. Any prior history of domestic violence reported or unreported? If Yes, explain: ☐ Yes ☑ No

2. Does Defendant have a criminal history? (If Yes, submit any available criminal history report) ☐ Yes ☑ No

3. Any prior or pending court proceedings involving parties? (If Yes, enter docket number, court, county, state) ☑ Yes ☐ No
   CASE NUMBER 2021-002773, 14TH JUDICIAL COURT, LA

4. Has a criminal complaint been filed in this matter? (If Yes, enter date, docket number, court, county, state) ☑ Yes ☐ No
   CASE NUMBER 2021-002773, 14TH JUDICIAL COURT, LA

5. If Law Enforcement Officers responded to a domestic violence call:
   Were weapons seized? If Yes, describe: ☐ Yes ☑ No Was Defendant arrested? If Yes, describe: ☐ Yes ☑ No

6. (A) The Plaintiff and Defendant are 18 years old or older or emancipated and are: (select one)
   ☐ Married / Civil Union ☐ Divorced ☐ Present Household Member ☐ Was at Any Time a Household Member **OR**
   (B) The Defendant is 18 years old or older or emancipated and Plaintiff and Defendant are: (select one)
   ☐ Unmarried ☑ Co-Parents ☐ Expectant Parents ☐ Plaintiff and Defendant have had a dating relationship

7. Where appropriate list children you have with the Defendant, if any (include name, sex, date of birth, person with whom child resides)

Child's Name: Last	First	M.I.	Sex	Birth Date	Resides

Docket Number	Defendant's Name
FV-07-000817-22	**CHARMAINE COLSTON**

8. The Plaintiff and Defendant: ☐ Presently; ☑ Previously; ☐ Never: Resided Together
☐ Family Relationship: What is your relationship to the defendant? _____ (Specify)

Certification

I certify that the foregoing responses made by me are true. I am aware that if any of the foregoing responses made by me are willfully false, I am subject to punishment.

06/08/2022
Date

JOHN C KING
Signature of Plaintiff

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	CHARMAINE COLSTON

Part 1 - RELIEF - Instructions: Relief sought by Plaintiff

DEFENDANT:

	TRO	FRO	TRO Granted	
1.	☑	N/A	☑	You are prohibited from returning to the scene of violence.
2.	☑	☑	☑	You are prohibited from future acts of domestic violence.
3.	☑	☑	☑	You are barred from the following locations: ☑ Residence(s) of Plaintiff ☑ Place(s) of employment of Plaintiff
				☑ Other (Only list addresses known to Defendant): 123 NORTH LOUISIANA AVE, LAKE CHARLES, LA
4.	☑	☑	☑	You are prohibited from having **any** oral, written, personal, electronic, or other form of contact or communication with Plaintiff.
	☐	☐	☐	Other(s):
5.	☑	☑	☑	You are prohibited from making or causing anyone else to make harassing communications to: Plaintiff
	☐	☐	☐	Other(s) - Same as item 4 above or list names:
6.	☑	☑	☑	You are prohibited from stalking, following or threatening to harm, stalk or follow: Plaintiff
	☐	☐	☐	Other(s) - Same as item 4 above or list names:
7.	☐	☐		You must pay emergent monetary relief to (describe amount and method):
	☐	☐	☐	Plaintiff:
	☐	☐	☐	Dependent(s):
8.	☐	☐	☐	You must be subject to intake monitoring of conditions and restraints:
	☐	☐	☐	Other (evaluations or treatment - describe):
9.	☐	☐	☐	Psychiatric evaluation:
10.	☑	☑	☑	**Prohibition Against Possession of Weapons:** You are prohibited from possessing **any and all firearms or other weapons** and must immediately surrender these firearms, weapons, permit(s) to carry, application(s) to purchase firearms and firearms purchaser ID card to the officer serving this Court Order. Failure to do so may result in your arrest and incarceration.

PLAINTIFF:

11.	☐	☐	☐	You are granted exclusive possession of (list residence or alternate housing only if specifically known to defendant):
12.	☐	☐	☐	You are granted temporary custody of:
13.	☐	☐	☐	Other relief for - Plaintiff:
	☐	☐	☐	Other relief for - Children:

LAW ENFORCEMENT OFFICER:

You are to accompany to scene, residence, shared place of business, other (indicate address, time, duration and purpose):

☑	☑	☑	Plaintiff: ACCOMPANY PLAINTIFF TO HIS RESIDENCE
☐	☐	☐	Defendant:

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	CHARMAINE COLSTON

Warrant to Search for and to Seize Weapons for Safekeeping

☑ **To any law enforcement officer having jurisdiction -** this Order shall serve as a warrant to search for and to seize any issued permit to carry a firearm, application to purchase a firearm and firearms purchaser identification card issued to the defendant and the following firearm(s) or other weapon(s).Describe the weapons to be seized:
38 PISTOL

1. **You are hereby commanded** to search for the above described weapons and/or permits to carry a firearm, application to purchase a firearm and firearms purchaser identification card and to serve a copy of this Order upon the person at the premises or location described as:
1225 COUNTRY CLUD RD UNIT 5107, LAKE CHARLES, LA

2. **You are hereby ordered** in the event you seize any of the above described weapons, to give a receipt for the property so seized to the person from whom they were taken or in whose possession they were found, or in the absence of such person to have a copy of this Order together with such receipt in or upon the said structure from which the property was taken.

3. **You are authorized** to execute this Order immediately or as soon thereafter as is practicable:

☐ Anytime ☑ Other: IMMEDIATELY

4. **You are further ordered,** after the execution of this Order, to promptly provide the Court with a written inventory of the property seized per this Order.

Part 2 - RELIEF - DEFENDANT:

	TRO	FRO	TRO Granted	
1.	☐	☐	☐	No parenting time / visitation until further ordered;
	☐	☐	☐	Parenting time / visitation pursuant to _____ suspended until further order: _____
	☐	☐	☐	Parenting time / visitation permitted as follows:
2.	☐	☐	☐	Risk assessment ordered (specify by whom, any requirements, dates):
3.	☐	☐		You must provide compensation as follows:
	☐	☐	☐	Emergent support for Plaintiff: _____
	☐	☐	☐	for Dependent(s): _____
	N/A	☐	☐	Ongoing support for Plaintiff: _____
	N/A	☐	☐	for Dependent(s): _____
	☐	☐	☐	Compensatory damages to Plaintiff: _____
	N/A	☐	☐	Punitive damages to Plaintiff: _____
	N/A	☐	☐	to Third Party(ies) (describe): _____
	☐	☐	☐	Medical coverage for Plaintiff: _____
	☐	☐	☐	for Dependent(s): _____
	☐	☐	☐	☐ Rent ☐ Mortgage payments (specify amount(s) and recipient(s)):
	☐	☐	☐	You must participate in a batterers intervention program:
	☐	☐	☐	You are granted temporary possession of the following personal property (describe):

Part 2 - RELIEF - PLAINTIFF:

☐ ☐ ☐ You are granted temporary possession of the following personal property (describe):

Comments:

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to *N.J.S.A.* 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court *can* modify any of the terms or conditions of this court order.**

Docket Number	Defendant's Name
FV-07-000817-22	**CHARMAINE COLSTON**

Addendum:

☐ **TRO denied.** Complaint dismissed by Family Part.

☐ **TRO denied by Municipal Court.**

☐ **TRO denied** by Superior Court Judge at De Novo Hearing.

☐ **TRO granted** by Superior Court Judge at De Novo Hearing. The Court has established jurisdiction over the subject matter and the parties pursuant to *N.J.S.A.* 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to *R.* 5:7A(b) and *N.J.S.A.* 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.

☑ **TRO granted.** The Court has established jurisdiction over the subject matter and the parties pursuant to *N.J.S.A.* 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to *R.* 5:7A(b) and *N.J.S.A.* 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.

Date/Time ☐ Via Telecommunications	s/ Hearing Officer	
Date/Time ☐ Via Telecommunications	s/ Honorable Municipal Court Judge	Court / County
06/08/2022 09:58 AM Date/Time ☐ Via Telecommunications	s/ JOANNE COCCHIOLA Honorable Superior Court Judge	ESSEX Court / County

All Law Enforcement Officers Will Serve and Fully Enforce This Order

This *ex parte* Domestic Violence Complaint and Temporary Restraining Order meets the criteria of the federal Violence Against Women Act for enforcement outside of the State of New Jersey upon verification of service of defendant. 18 *U.S.C.A.* 2265 & 2266

This Order Shall Remain in Effect Until Further Order of the Court and Service of Said Order on the Defendant.

Notice to Appear to Plaintiff and Defendant

1. ☐ Both the plaintiff and defendant are ordered to appear for a final hearing on (date) _____ at (time) _____ at the Superior Court, Chancery Division, Family Part, _____ County, located at (address)

Note: You must bring financial information including pay stubs, insurance information, bills and mortgage receipts with you to Court.

2. ☑ Remote: All parties shall appear for a hearing on 08/01/2022 at 08:30 AM
   - I. ☐ Video Remote Hearing is scheduled at the above date and time. You must attend via video as scheduled. Please contact the court for further details at _____
   - II. ☐ Phone Remote Hearing is scheduled at the above date and time. You must attend via Phone as scheduled. Please contact the court for further details at _____
   - III. ☑ Remote Hearing is scheduled at the above date and time. You must attend as scheduled. Please contact the court for further details at 973-776-9300 X57210
   - IV. ☐ The proceeding will be conducted on the papers. Please contact the court for details _____
3. ☐ The final hearing in this matter shall not be scheduled until: _____
4. ☐ Interpreter needed. Language: _____

Upon satisfaction of the above-noted conditions notify the Court immediately so that a final hearing date may be set.

IMPORTANT: The parties cannot themselves change the terms of this Order on their own. This Order may only be changed or dismissed by the Superior Court. The named defendant cannot have any contact with the plaintiff without permission of the Court.

Notice to Defendant

A violation of any of the provisions listed in this Order or a failure to comply with the directive to surrender all weapons, firearm permits, applications or identification cards may constitute criminal contempt pursuant to *N.J.S.A.* 2C:29-9(b), and may also constitute violations of other state and federal laws which may result in your arrest and/or criminal prosecution. This may result in a jail sentence.

You have the right to immediately file an appeal of this temporary Order before the Superior Court, Chancery Division, Family Part, as indicated above and a hearing may be scheduled.

Docket Number	**Defendant's Name**
FV-07-000817-22	**CHARMAINE COLSTON**

Return of Service

☑ Plaintiff was given a copy of the Complaint / TRO by:

SERVED IN COURT JENKINS T	09:58 AM 06/08/2022	ESSEX COUNTY SUPERIOR COURT
Print Name	Time and Date	Signature / Badge Number / Department

☑ I hereby certify that I served the within Complaint / TRO by delivering a copy to the Defendant personally:

SERVED IN COURT JENKINS T	09:59 AM 06/08/2022	ESSEX COUNTY SUPERIOR COURT
Print Name	Time and Date	Signature / Badge Number / Department

☐ I hereby certify that I served the within Complaint / TRO by use of substituted service as follows:

Print Name	Time and Date	Signature / Badge Number / Department

☐ Defendant could not be served (explain): _____

Print Name	Time and Date	Signature / Badge Number / Department

The Courthouse is accessible to those with disabilities. Please notify the Court if you require assistance.

Distribution: Family Part, Plaintiff, Defendant, Sheriff, Other _____

08/14/2023
John King
Vs.
Charmaine Colston
Case # 23-1206
Lake Charles City Court
Ward Three
Calcasieu Parish
State of Louisiana

Motion to Quash

Dear Honorable Judge Lake Charles City Court, Civil Division Lake Charles Louisiana. A terrible injustice has occurred wherein my property was taken via title fraud and forgery by force from my ex girlfriend while under two restraining orders. As you can see her attorney Derrick Kee filed for exceptions however there are several problems with his motion including but not limited to …

A) Conflict of Interest- You will find in testimony the Mr. Kee served on the very bench that at one point handled my case and the ADA's that worked under him. He himself specifically was contacted with a complaint regarding my stolen car for which he responded offering proposed resolution. A Calcasieu Parish judge should not ethically in good moral conscience be able to represent a case that involves a former parish employee who benefited financially from her position at the city controller's office for which she was fired for the very mishandling and unethical behavior which predated the illegal transfer of my car title by forgery. You will find with evidence and witness testimony that Charmaine Y Colston is in fact a professional scammer and has in the last 4 years conducted a number of scams yielding her over $100k per year in inflows from money and government handouts. For what unknown reason would Mr. Kee benefit by representing this case pro bono when the evidence is contrary to his written claims in his motion? Mr. Kee was dishonest in his motion at no time in the case investigation provided for review does it ever say that anything was gifted to her or that she "beat a case". Contrary to that it is obvious that the transfer involves a "Bill of Sale" BKA a Promissory Note also known as a debt instrument for which the amount she claims remains outstanding.. In the state of Louisiana the Statute of Limitations on this sort of transaction is five years and not 1 year. La . Stat. tit. 10.

3-419 " Actions on negotiable instruments, and on promissory notes whether negotiable or not are subject to a liberal prescriptive of five years. This prescription commences to run from the day payment is eligible" As you can see from the results of the investigations attached this is one of many reasons why this case was filed timely.

B) "Discovery"- The begins from the point of reasonable discovery and as you can see from emails dated August 2022 between the District Attorney office and Calcasieu Parish Sheriff Dept as of August 2022 they claimed it was still an open investigation and could not verify the results of the investigation which would be necessary to determine who the owner of the vehicle actually was. Carfax does not display who the owner is nor does the Lake Charles City Police Department release the name of the owners. In order for me to know that Renee Amos (the unethical notary involved) who conspired with Charmaine Colston to pretend as if I were in the State of Louisiana at the time to steal the title of my car. This is an undeniable act of forgery that could only be determined by the Louisiana Department of Motor Vehicles releasing who the title was registered under. I left during a state of emergency of a hurricane and had to work up north to earn a living. Left my vehicle behind which Charmaine Colston sold her brand new Honda Civic immediately prior to evacuation and I was told that she had not had time to secure another vehicle. I intended to leave the car with my mother post hurricane for which I still have the keys. If I had "given" as Mr Kee alleges wouldn't I have also given all of the keys? The Discovery of who the car was titled to was handed over to the Calcasieu Parish DA office and was not made available to me.

C) Mr Kee made many dishonest assertions, one of which is that she "beat" the case? How so when the evidence shows she refused to ever even give a statement and admitted to the forgery. Her defense is that I told her she could forge my name? Charmaine Colston did not cooperate with the investigation other than to harass ADA Ross Murray seen in multiple forms of evidence which I have provided a warrant for her arrest was issued in regards to the detectives investigation as forgery was admitted and proven. However there are no exceptions allowed by law which would allow any Louisiana resident to stand in front of a notary which required me to appear in person with two forms of identification. Noone can have "permission" to forge a notarized document. This is the one sticking point that cannot be ignored: Charmaine Colston forged my name twice while under a restraining order. Both in September 2021 and October 2021 she did this purposefully as the registration was in no danger of expiring and I was required to carry insurance coverage on the car for many months past the month of October 2021. My flight evidence also reveals that my flight was to land within 72 hours of the forged transfer. Why would she need to forge the document ? The emails themselves show where on multiple occasions she threatened me telling me to come and get my vehicle and that she did not want it. Why would a married man tell his ex girlfriend that she could forge his signature while under restraining order?

D) Please reference correspondence where my attorney and Charmaine Colston attorney agreed that Charmaine would return my vehicle to the home of Cynthia Smith prior to my arrival so that I would have a means of transportation on October 8, 2021.
E) Lastly the Joint Torts exception invalidates Mr Kees claims for prescription as I have filed suit against Renee Amos and charges against Renee Amos were brought by the Louisiana Secretary of State Notary Division. Colston and Amos share joint liability in the illegal transfer of my title by both willingly and illegally conspiring to steal the title for which Renee Amos was complacent and participated. Joint Torts statute of limitations would also exist for longer than a one year period in Louisiana.

I ask that you humbly soo this case for what it is. It was an intentional vindictive act of financial abuse perpetrated by a bitter ex girlfriend in retaliation to my marital status. What other explanation could there be? I am entitled to compensation of the payoff amount and I have declared bankruptcy and cannot obtain another vehicle.

Additional exceptions include

One of which was for stalking. Additionally I had no access to an open investigation for case number 2021-00123665 until the detective released it November 2023 confirming without a doubt that the suspect Charmaine Y Colston had committed title fraud by

1. Fraudulently appearing in front of a notary whom was a friend while I was not in the state

on 09/07/2021 and intentionally and knowingly while under a restraining order forged my signature onto a notarized document of notary Renee Amos. I was 2000 miles away on this day and there is no way I could have been in the state of Louisiana and this is confirmed by Charmaine Colston herself and a thorough investigation by the Calcasieu Parish Sheriff Department and Lake Charles Police Department. Evidence attached shows Charmaine Colston fraudulently and intentionally stealing my car title even though she was under a restraining order. These exceptions for stalking, restraining order and period of discovery as shown within the investigation shows I am well within the statute of limitations. As the defendant's attorney herself made a motion saying I must "prove" through evidence that she stole the car. This evidence

was released to me November 2022 and I proceeded to seek the proper remedy.

2. Charmaine Colston abused her position as a former employee with the city of Sulphur LA

where her previous role was the transfer of auto titles for the city. Witness testimony will confirm that Charmaine Colston maliciously and intentionally engaged in scams to obtain my assets illegally. She was trained in how to do so and if you refer to the investigation conducted by Detective Castille You will see without a donut on camera that I was not there when she stole the title to my car and transferred the joint assets of myself and my spouse. The Chevrolet Traverse was obtained by title fraud. The results of the investigation confirm this and she not only has scammed me but also filed a fake racial discrimination lawsuit against the City of Sulphur when she was fired for disorderly conduct. She used the race card to file suit and obtain a $55k settlement from the City of Sulphur Louisiana, Colston has also engaged in FEMA fraud, forged life insurance and securities fraud of which the stolen policies had to be reissued back to me with a formal apology. Colston forges multiple documents pretending to be my spouse and although my ex girlfriend we have never been

married or represented ourselves as married. I have over 35 pages of evidence from independent investigations that prove that Charmaine intentionally got the title notarized when I was not present by fraud. She also claims to have paid me "$100" for the car of which I have never received payment and it would have been impossible as Colston was under a restraining order in two different states at the time.

I intend to interview two witnesses in court on Wednesday August 16, 2023 and will insist that Mr. Derrick Kee, a former Calcasieu Parish Judge who stands to gain financially from representation of fraudulent acts and investigations that involve lawsuits against the Parish for financial gain as evidence of a series of scams and financial abuses.

Thank You
John C. King Sr.

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

May 28, 2025

TO: Oliver "Jackson" Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Email: oschrumpf@schrumpf-law.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5,397.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)

Please remit payment for the amount listed above.

If you have any questions about the named suit above, please call the Accounting Section of Lake Charles City Court at (337) 491-8701, or Civil office at (337)491-1564.

Monica Abshire
Clerk of Court
mabshire@lccitycourt.org

Affidavit of Transmission

Attention: John C. King email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: December 12, 2024

Docket No. 23-2124 John C King, Sr vs. Renee Amos – 7 pages received – Emergency Motion to Recuse/Remove Honorable Judge Ron Richard; Motion to Vacate Retaliatory Judgments; Motion to Strike & Seal Identifying information from Public Record; Motion to Intervene to prevent further Judicial Harassment & Loss of Life; Order

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

LAKE CHARLES CITY COURT

118 West Mill Street
Lake Charles, LA 70601

STATEMENT

December 23, 2024

John Clifford J King
vs. 23-2124
Renee Amos Notary Public Notary ID# 29374

Transcript of testimony of trial on November 14, 2024
Judge Ronald C. Richard

117 pages $ 555.75

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601
  kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant’s Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis

I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant's **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), "excited utterance"**, and **La. C.E. Art. 803(3), "then-existing mental, emotional, or physical condition"**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses' statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant's claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Case # 23-2124
King Vs Amos The Hartford

Motions Continuance DismissQuash
10/31/2024

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the 31st day of October, 2024, at 6:58 o'clock AM/PM, Lake Charles, Louisiana.

5/31/24

signature

STATE OF LOUISIANA

Case # 23-2124 Motions Continuance DismissQuash
King Vs Amos The Hartford 10/31/2024

PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared **John CJ King Sr.**, who, after being duly sworn, did depose and say:

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical



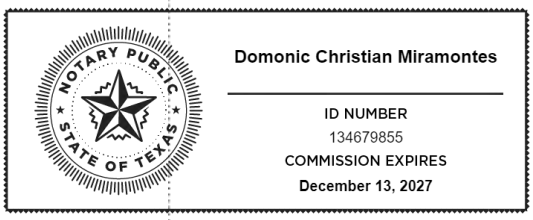
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DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 10/31/2024

Number of Pages (including notarial certificate): 7



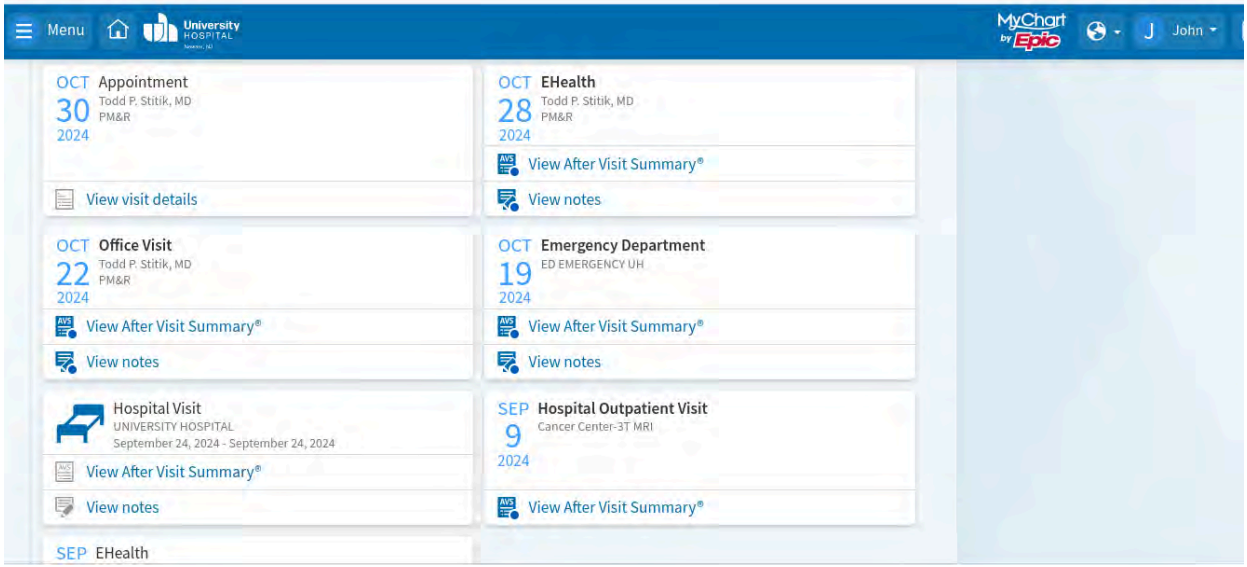
State of Texas

County of Bexar

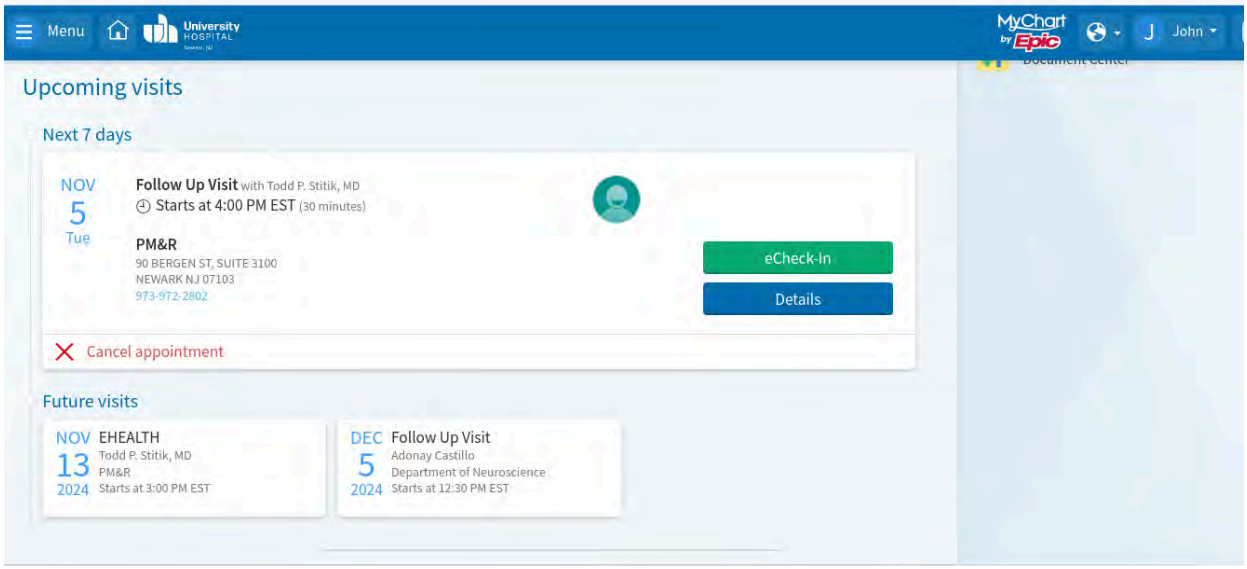
This instrument was acknowledged before me by means of an interactive two-way audio and video communication on 10/31/2024 by John Clifford King.

Case #23-2124 King VsAmos
11/04/2024
Confidential Medical Record from
Cancer center, Ambulance, Emergency Room, Hospital Admittance
Discharged on rolling walker to Muscular Skeletal and Neuro for seizures

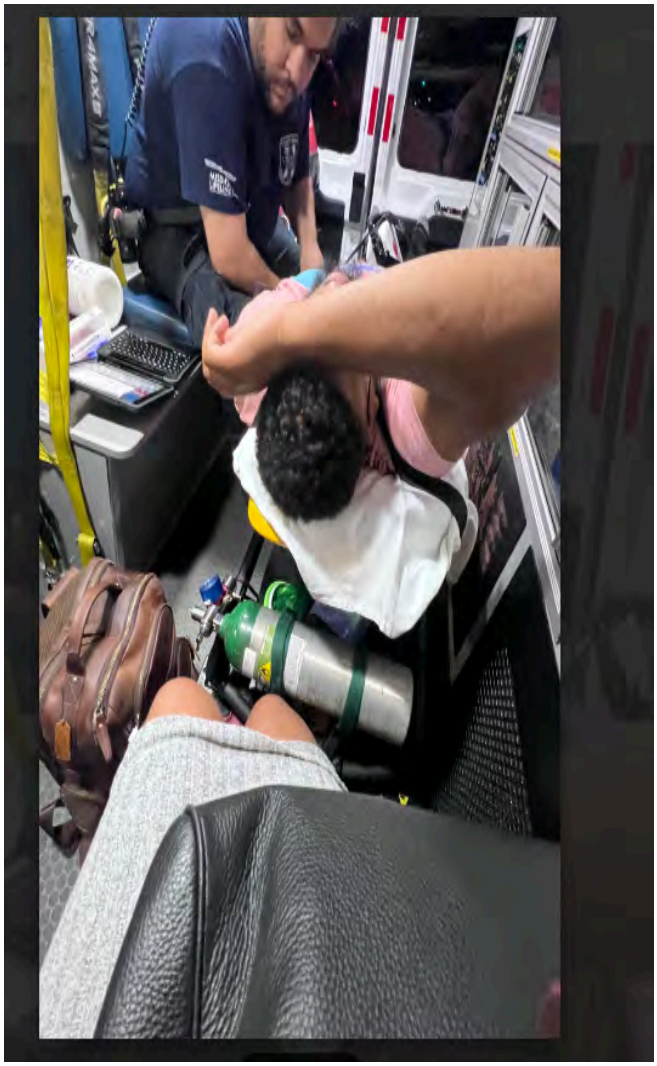
King Medical Records
September 9. 2024 - Cancer center outpatient
Oct 19, 2024 - taken to hospital by ambulance seizures - admitted temporary paralysis spinal tear
Oct 24, 2024 discharged to Muscular Skeletal and Neurology
Oct 28, 2024 - Muscular Skeletal
Oct 30, 2024 - Muscular Skeletal

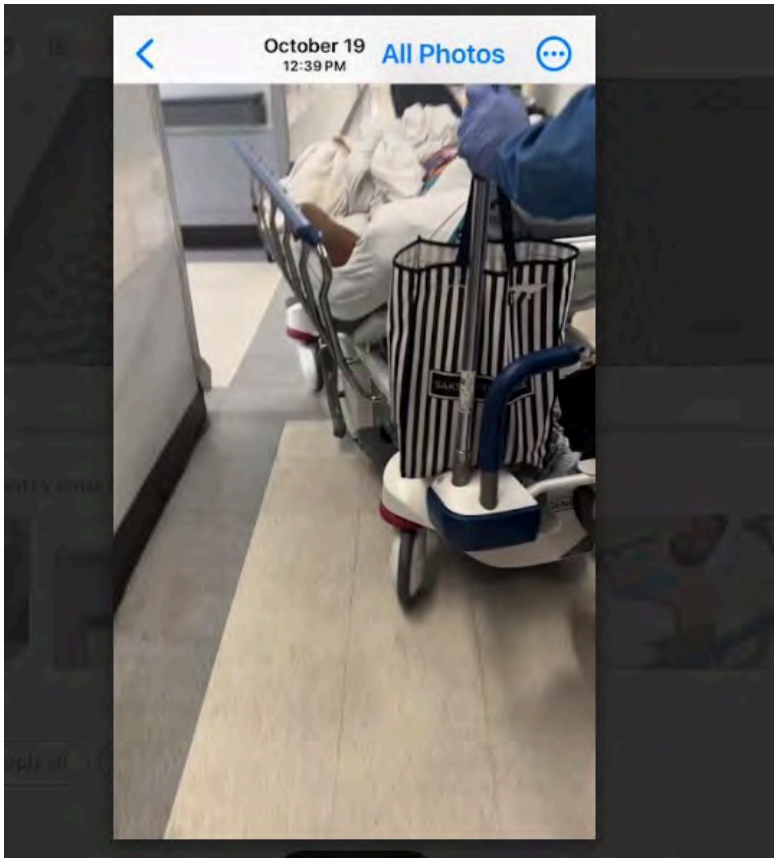


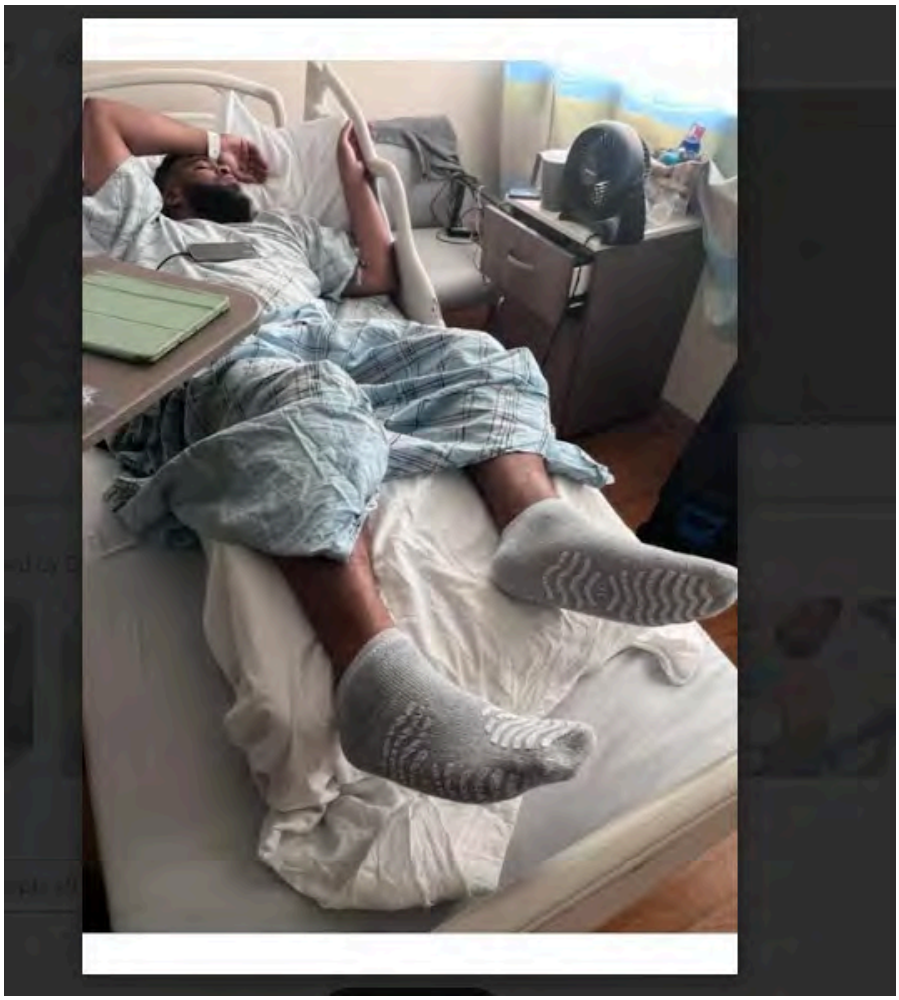
King Upcoming Nuerology and Muscular Skeletal
November 5, 2024 - Muscular Skeletal - review spinal cord swelling
November 13, 2023 - outpatient epidural to stabilize spinal tear
December 5, 2024 - Results of from neurosurgeon from outpatient treatment at cancer center and physical therapy


Menu
University HOSPITAL
MyChart by Epic
John
Upcoming visits
Next 7 days
NOV
5
Tue
Follow Up Visit with Todd P. Stitik, MD
Starts at 4:00 PM EST (30 minutes)
PM&R
90 BERGEN ST, SUITE 3100
NEWARK NJ 07103
973-972-2802
eCheck-In
Details
Cancel appointment
Future visits
NOV
13
2024
EHEALTH
Todd P. Stitik, MD
PM&R
Starts at 3:00 PM EST
DEC
5
2024
Follow Up Visit
Adonay Castillo
Department of Neuroscience
Starts at 12:30 PM EST

Photos

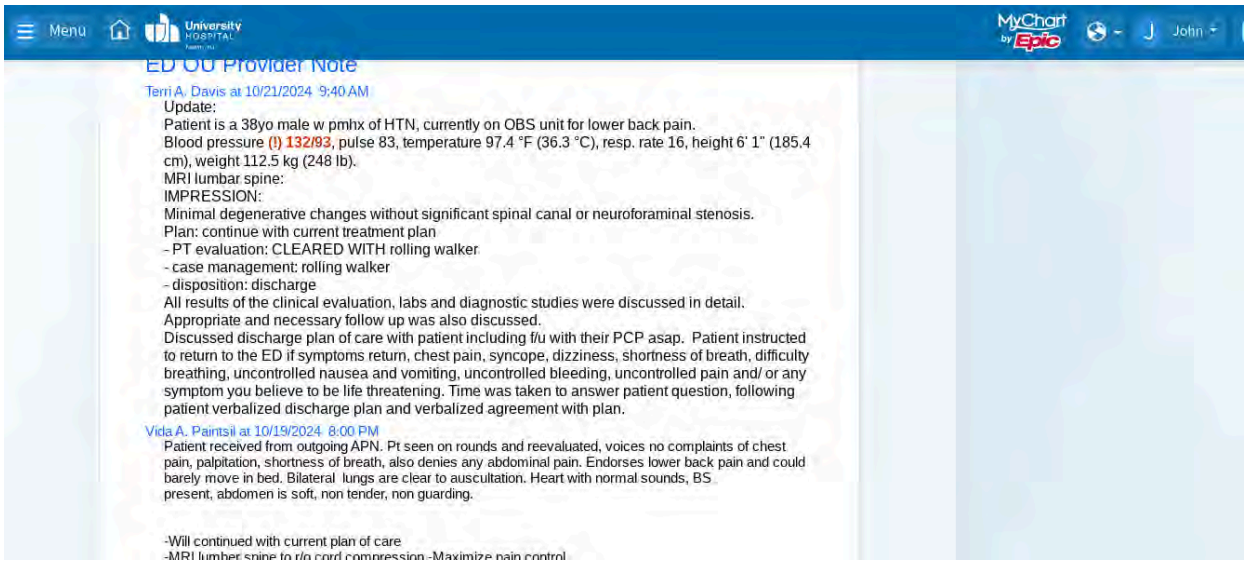



October 19
12:39 PM
All Photos





Discharged on Rolling Walker, Compressed Spine History of Seizures



Menu University Hospital MyChart by Epic John

ED OU Provider Note

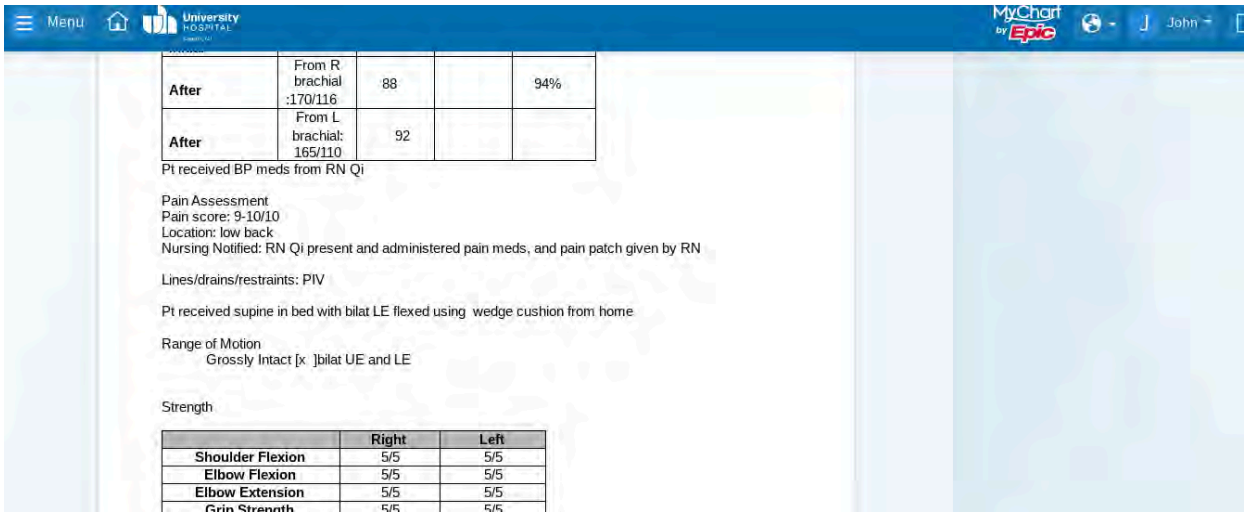
Terri A. Davis at 10/21/2024 9:40 AM

Update:
Patient is a 38yo male w pmhx of HTN, currently on OBS unit for lower back pain.
Blood pressure (!) 132/93, pulse 83, temperature 97.4 °F (36.3 °C), resp. rate 16, height 6' 1" (185.4 cm), weight 112.5 kg (248 lb).
MRI lumbar spine:
IMPRESSION:
Minimal degenerative changes without significant spinal canal or neuroforaminal stenosis.
Plan: continue with current treatment plan
- PT evaluation: CLEARED WITH rolling walker
- case management: rolling walker
- disposition: discharge
All results of the clinical evaluation, labs and diagnostic studies were discussed in detail.
Appropriate and necessary follow up was also discussed.
Discussed discharge plan of care with patient including f/u with their PCP asap. Patient instructed to return to the ED if symptoms return, chest pain, syncope, dizziness, shortness of breath, difficulty breathing, uncontrolled nausea and vomiting, uncontrolled bleeding, uncontrolled pain and/ or any symptom you believe to be life threatening. Time was taken to answer patient question, following patient verbalized discharge plan and verbalized agreement with plan.

Vida A. Paintsil at 10/19/2024 8:00 PM

Patient received from outgoing APN. Pt seen on rounds and reevaluated, voices no complaints of chest pain, palpitation, shortness of breath, also denies any abdominal pain. Endorses lower back pain and could barely move in bed. Bilateral lungs are clear to auscultation. Heart with normal sounds, BS present, abdomen is soft, non tender, non guarding.

-Will continued with current plan of care
-MRI lumber spine to r/o cord compression -Maximize pain control



After	From R brachial :170/116	88		94%
After	From L brachial: 165/110	92		

Pt received BP meds from RN Qi

Pain Assessment
Pain score: 9-10/10
Location: low back
Nursing Notified: RN Qi present and administered pain meds, and pain patch given by RN

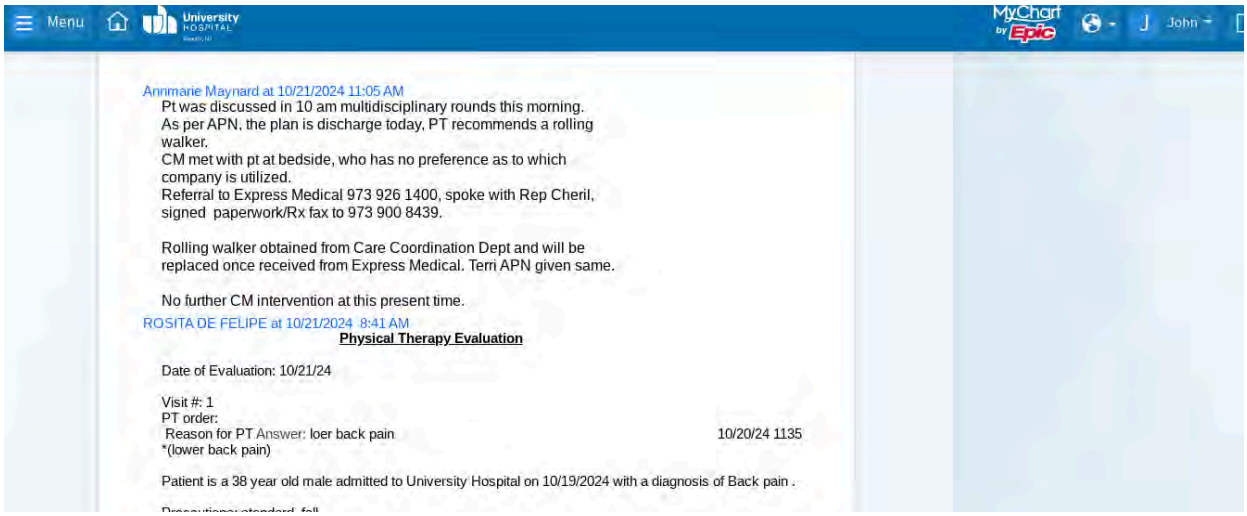
Lines/drains/restraints: PIV

Pt received supine in bed with bilat LE flexed using wedge cushion from home

Range of Motion
Grossly Intact [x]bilat UE and LE

Strength

	Right	Left
Shoulder Flexion	5/5	5/5
Elbow Flexion	5/5	5/5
Elbow Extension	5/5	5/5
Grip Strength	5/5	5/5



Annmarie Maynard at 10/21/2024 11:05 AM

Pt was discussed in 10 am multidisciplinary rounds this morning.
As per APN, the plan is discharge today, PT recommends a rolling walker.
CM met with pt at bedside, who has no preference as to which company is utilized.
Referral to Express Medical 973 926 1400, spoke with Rep Cheril, signed paperwork/Rx fax to 973 900 8439.

Rolling walker obtained from Care Coordination Dept and will be replaced once received from Express Medical. Terri APN given same.

No further CM intervention at this present time.

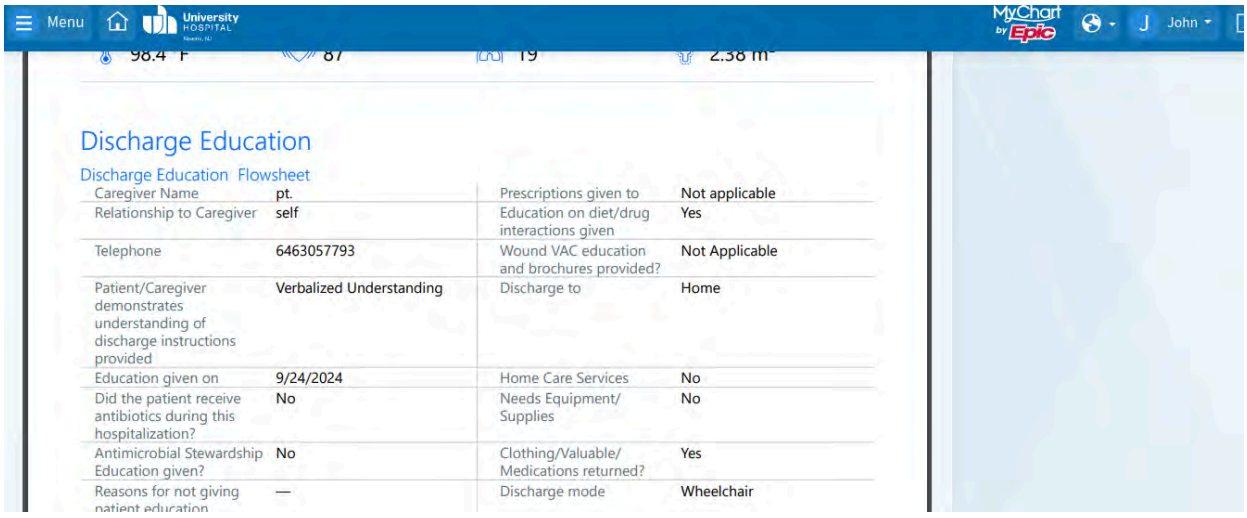
ROSITA DE FELIPE at 10/21/2024 8:41 AM

Physical Therapy Evaluation

Date of Evaluation: 10/21/24

Visit #: 1
PT order:
Reason for PT Answer: loer back pain 10/20/24 1135
*(lower back pain)

Patient is a 38 year old male admitted to University Hospital on 10/19/2024 with a diagnosis of Back pain .



98.4 °F 87 19 2.38 m²

Discharge Education

Discharge Education Flowsheet

Caregiver Name	pt.	Prescriptions given to	Not applicable
Relationship to Caregiver	self	Education on diet/drug interactions given	Yes
Telephone	6463057793	Wound VAC education and brochures provided?	Not Applicable
Patient/Caregiver demonstrates understanding of discharge instructions provided	Verbalized Understanding	Discharge to	Home
Education given on	9/24/2024	Home Care Services	No
Did the patient receive antibiotics during this hospitalization?	No	Needs Equipment/ Supplies	No
Antimicrobial Stewardship Education given?	No	Clothing/Valuable/ Medications returned?	Yes
Reasons for not giving patient education	—	Discharge mode	Wheelchair


The Judiciary Commission of Louisiana
Office of Special Counsel
Mrs. Nicole Jones King
123 N. Louisiana Ave.
Lake Charles, LA 70601


The Judiciary Commission of Louisiana
Office of Special Counsel
Mrs. Nicole Jones King
123 N. Louisiana Ave.
Lake Charles, LA 70601

The Judiciary Commission of Louisiana

January 23, 2024

PERSONAL AND CONFIDENTIAL
Vincent Jones King
123 N. Louisiana Avenue
Lake Charles, LA 70611

RE: [illegible]

Dear Mr. King:

Your complaint against Judge Ronald Ricard was reviewed and assigned [illegible]. While the Office of Special Counsel has not taken a position as to your complaint at this time, we have offered Judge Ricard the opportunity to answer your complaint.

The Louisiana Constitution (Article V, Section 25(C)) and the Rules of the Louisiana Supreme Court (Rule XXIII, Section 23) require that all proceedings before the Judiciary Commission are confidential from the time a complaint is filed throughout the investigatory stage of proceedings. While this rule does not allow you to disclose to anyone the fact that you filed a complaint with the Commission or the Commission's actions on the complaint at this time, you may disclose and discuss the underlying events that led you to file a complaint. You also retain the confidentiality of Commission proceedings – we will not be able to provide you with any details about the status of your complaint while it is pending resolution.

We are not permitted to give you legal advice or to comment over legal matters. The Judiciary Commission does not have the authority to order a judge to recuse himself, to change [illegible] or to take any particular action. If you want a court order or a different outcome in your case, you should consult with your own attorney. [illegible]

You will be advised of the Commission's resolution of this file at that time. The Commission may subpoena you for [illegible] and to testify under oath. If you wish to submit any [illegible] to advise the Judge about his or her ethical obligations under the Code of Judicial Conduct. These communications are private and confidential. The private investigation of a file is not normally [illegible]. Another possibility is that the Commission may, after an investigation, [illegible] a Notice of Hearing on that a Hearing Officer may hold an evidentiary hearing about the allegations. Then the Commission issues a Day or Time a Notice of Hearing, [illegible] respondents, and witnesses are no longer prohibited from discussing or disclosing the Commission proceedings. For further understanding of the rules regarding Judiciary Commission

THIRD CIRCUIT COURT OF APPEAL

STATE OF LOUISIANA

****

NUMBER: CA - 25 - 0049

****

JOHN CLIFFORD KING
Plaintiff/Applicant

VERSUS

RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY
Defendants/Respondents

****

CIVIL DEVOLUTIVE APPEAL
FROM THE WARD 3/ LAKE CHARLES CITY COURT
DOCKET NO.: 23-2124
HONORABLE RON RICHARD
CALCASIEU PARISH, LOUISIANA

****

ORIGINAL REPLY BRIEF ON BEHALF OF RESPONDENTS

****

Respectfully submitted:

_____

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CIVIL APPEAL

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STATEMENT OF THE CASE AND ACTION OF THE TRIAL COURT

Plaintiff, John Clifford King, listed his permanent residence as his mother's house located at 123 N. Louisiana Avenue, Lake Charles, Louisiana. After the hurricanes in 2020, Mr. King moved to New Jersey or New York State to work. Prior to leaving town, Mr. King left his 2011 red Chevrolet Traverse, La. License No. 346EYM, at his mother's house and allowed his former girlfriend and mother of his children, Ms. Charmaine Colston, to drive the vehicle. Mr. King claimed that "on or about September 7, 2021, [while he was in New Jersey or working in New York State] Charmaine Colston (either by herself or in conspiracy with someone else) appeared before a Notary, Renee Amos, in Lake Charles, La. and executed a fraudulent title transfer of the Chevrolet to Colston. Mr. King did not learn of this fraudulent transfer until August 25, 2022 when an investigative report of the Lake Charles Police Department was released to him. Meanwhile Charmaine Colston had sold the vehicle." (R.p. 708, Plaintiff's brief, p. 5). A suit filed by Mr. King in proper person against Ms. Colston was dismissed with prejudice on the basis of prescription on August 17, 2023. (R.pp. 59-62).

Mr. King filed suit in forma pauperis and in proper person against Notary, Mrs. Renee Amos, and later added her insurance carrier, Hartford Fire Insurance Company (Hartford), for executing a title transfer for Ms. Colston when he, the title owner, was not present and did not sign. Mr. King claims Mrs. Amos allegedly "undertook to provide illegal notarial services . . . well aware [they] were illegal . . . [and] lied and abused her professional powers." (R.pp. 9-13). Numerous pro se motions were filed and e-mails sent to the court by Mr. King before and during the time he was represented by two different attorneys Mr. King was able to retain despite pauper

status. Among the pro se motions were a Motion to Recuse/Remove Honorable Judge Ron Richard, a Motion to Vacate Retaliatory Judgments, a Motion to Strike and Seal Identifying Information From Public Record, and a Motion to Intervene and Prevent Further Judicial Harassment and Loss of Life. (R.pp. 592-600). It was determined that many of Mr. King's allegations were simply false.[1]

Trial in the matter was held on November 21, 2024. The Trial Court stated that it believed Mr. King when he testified he was out of state on September 7, 2021 when the title transfer occurred. However, the Trial Court also believed Mrs. Amos' testimony that although she had no recollection of this particular transaction in 2021, she testified that "my practice is to check the ID's of all parties, the buyer and the seller. (R.pp. 665, 755-756, 758-759). The Trial Court dismissed plaintiff's claims with prejudice and Judgment was signed, November 21, 2024. (R.p. 547). A Motion and Order for Devolutive Appeal was signed December 3, 2024. (R.p. 581).

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[1] Mr. and Mrs. King had made allegations that the trial judge and his staff disclosed confidential information that led to the murder of an individual in Iowa, Louisiana. Apparently Mrs. King is a "protected crime victim from the State Attorney General's Office." (R.p. 721). Mrs. King claimed a man was shot six times at their in-laws and there were three helicopters searching for a suspect. The Trial Court noted there were no murders in Iowa this year and the nearest police helicopter was in Baton Rouge. (R.pp. 775-777). Mrs. King was also held in contempt for calling 9-1-1 and having EMTs show up and disrupt court, despite the fact that Mr. King stated he did not need medical attention. (R.p. 776).

ASSIGNMENTS OF ERROR

I). The Trial Court erred in denying Defendant's Peremptory Exception of Prescription as the case prescribed a year from the date of the alleged act.

II). Plaintiff alleges "the Trial Court erroneously applied the burden of proof; after plaintiff proved he was out of state at the time the Notary allegedly notarized his signature to the title transfer, the burden of proof should have shifted back to the Notary to prove she properly identified John Clifford King as the signor."

III). Plaintiff alleges "the Trial Court erred in faulting plaintiff for not calling Charmaine Colston as a witness since Colston was the perpetrator who stole the vehicle; either party could have subpoenaed Colston. But Colston's testimony was unnecessary. The Notary failed to identify John King or anyone else as the signor."

ISSUES ON APPEAL

I). The Trial Court denied Defendant's Peremptory Exception of Prescription. The alleged act in question occurred on September 7, 2021. Plaintiff was aware of this and reported the matter to the Calcasieu Parish Sheriff's Office on October 9, 2021. Suit was not filed until August 21, 2023. At no time did plaintiff attempt to contact the Louisiana State Police or the Department of Motor Vehicles. Plaintiff's case prescribed under La. R.S. 35:200.

II). Once the Trial Court was satisfied, through uncertified documents and the self-serving testimony of Mr. and Mrs. King, that Mr. King was out-of-state at the time Notary Amos notarized Mr. King's signature, should the burden of proof should have shifted back to the Notary to prove she properly identified Mr. King as the signor? The answer is an absolute No. All that is required of a Notary is to check identification and watch the individuals affix their signature to a document. If

anything, should the plaintiff first have the burden of proving the signature was indeed a forgery?

III). The Trial Court did not fault plaintiff for not calling Ms. Charmaine Colston as a witness. The Trial Court only said it would be helpful to have her present. The minutes conflict with the trial transcript and should be corrected.

STATEMENT OF THE FACTS

John Clifford King owned a 2011 red Chevrolet Traverse, La. License No. 346EYM, which he left at his mother's house after the hurricanes in 2020 and allowed his former girlfriend and mother of his children, Ms. Charmaine Colston, to use. According to Mr. King, he was in New Jersey or working in New York State on or about September 7, 2021. He claims that "Charmaine Colston (either by herself or in conspiracy with someone else) appeared before a Notary, Renee Amos, in Lake Charles, La. and executed a fraudulent title transfer of the Chevrolet to Colston." Mr. King claims in brief filed in proper person that he did not learn of this fraudulent transfer until August 25, 2022 when an investigative report of the Lake Charles Police Department was released to him. (Plaintiff's brief, p. 5). Meanwhile, Ms. Colston had sold the vehicle.[2] Mr. King testified that when he stopped paying for insurance on the Chevrolet, his license was suspended by the Louisiana Department of Motor Vehicles. (R.p. 708). Mr. King stated he paid off the $8,400 balance owed on the vehicle, and instituted suit against the Notary, Mrs. Renee Amos, for executing a title transfer for Charmaine Colston when he, the title owner, was not present and did not sign. (R.pp. 9-13). The Trial Court denied an exception of prescription filed

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[2] The name of the purchaser was never brought up in court. Perhaps this party have been subpoenaed also to see if he resembled Mr. King.

by Defense counsel, which Plaintiff's counsel state's "is not at issue here." (Plaintiff's brief, p. 7). Undersigned counsel disagrees with this statement.

Trial on the merits was held on November 14, 2024. The Trial Court, Hon. Ron Richard, was satisfied from the evidence presented that Mr. King was out-of-state on September 7, 2021, when the title transfer occurred. (R.pp. 755-759). The Trial Court also felt the Notary's testimony that, although she had no recollection of this particular transaction, she testified that "my practice is to check the ID's of all parties, the buyer and the seller." (R.pp. 756-757). The Trial Court dismissed plaintiff's claims with prejudice. (R.p. 547).

SUMMARY OF THE ARGUMENT

The Trial Court erred in denying Hartford and Mrs. Renee Amos' exception of prescription and allowing this matter to proceed to trial. Suit was filed well over a year from when Mr. King discovered the alleged fraudulent act, as well as the name of the Notary involved. (R.p. 62). Hartford and Mrs. Amos' exception fo prescription should have been granted as was Ms. Colston's exception of prescription. (R.p. 62).

The Trial Court found Mr. King to be credible when he testified he was out-of-state when his signature was notarized. Plaintiff erroneously believes "the burden of proof should [then] have shifted to defendant, Notary, to exculpate herself from presumed negligence or co-conspiracy with Colston in the transaction." Plaintiff contends that the "fact that the Notary claimed she always checks ID's and does not remember the incident on September 7, 2021, failed to absolve her of responsibility for executing a transfer when the owner was not present."

Mrs. Amos, a Notary for over 20 years, is not expected to remember every

"incident" over the past 20 years. Her testimony was deemed credible, she always followed the same procedure, and the Trial Court was correct in its ruling. The plaintiff feels that the Trial Court faulted plaintiff for not calling Ms. Colston as a witness. A reading of the minutes and the trial transcript reveals that the Trial Court did not fault the plaintiff. The Trial Court merely stated that it would been helpful to have Ms. Colston testify and that her testimony could have swayed the Trial Court one way or the other. (R.pp. 757, 760).

ARGUMENT

I). The Trial Court erred in denying Defendant's Peremptory Exception of Prescription.

On January 25, 2024, a hearing was held, wherein the Trial Court denied Hartford and Mrs. Amos' Peremptory Exception of Prescription. The alleged fraudulent act in question occurred on September 7, 2021. Suit was filed by Mr. King in proper person on August 21, 2023. (R.pp. 9-14). On October 9, 2021, Mr. King filed a report with the Calcasieu Parish Sheriff's Office, "in reference to a forged title. King reported his ex-girlfriend, Charmaine Colston, some how obtained the title to his vehicle . . . and forged his signature." (R.p. 22).[3] The record fails to show Mr. King took any further action such as contacting the Louisiana State Police or DMV, or attempting to locate Ms. Colston or his vehicle in order to mitigate his damages.[4] He never hired an attorney to correct the matter or have the fraudulent sale annulled.

In his brief and pleadings filed with this Honorable Court, Mr. King incorrectly alleges he was not made aware of the "fraudulent transfer until August 25, 2022 when an investigative report of the Lake Charles Police Department was released to him, thus providing the name of the Notary." (R.p. 10, Plaintiff's brief, p. 5). However, Plaintiff was aware of the "fraudulent transfer" on October 9, 2021, and was given a copy of the title showing the name of the Notary, Mrs. Renee Amos. As per Mr.

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[3] A person denying the validity of a signature on a notarized instrument bears the burden of proof that the signature is a forgery. LSA-C.C. Art. 1835. 3 *Succession of Velasquez-Bain*, 415 So. 2d 1013 (La. App. 4 Cir. 1982), *on appeal after remand*, 471 So. 2d 731 (La. App. 4 Cir. 1985); *Coleman v. Egle*, 376 So. 2d 983 (La. App. 1 Cir. 1979), *writ denied*, 379 So. 2d 15 (La. 1980).

[4] The duty to mitigate damages exists in both tort and contract law. *Altazan v. Pontchartrain Dredging Corp*., 385 So. 2d 292 (La.App. 1st Cir.1980).

King's trial testimony, he was given a copy of the title when he filed a complaint with the Calcasieu Parish Sheriff's Office on October 9, 2021. By October 19, 2021, detectives knew the names of all parties affixed to the title. (R.pp. 42,44,675).

> Louisiana Revised Statute 35:200 provides, in pertinent part:
>
> Limitation on actions
>
> A. No action for damages against any notary public duly commissioned in any parish in this state, any partnership of such notaries public, or any professional corporation, company, organization, association, enterprise, or other commercial business or professional combination answerable for the damage occasioned by such notary public in the exercise of the functions of a notary public, whether based upon tort, or breach of contract, or otherwise, arising out of an engagement to provide notarial services shall be brought unless filed in a court of competent jurisdiction and proper venue within **one year from the date of the alleged act, omission, or neglect, or within one year from the date that the alleged act, omission, or neglect is discovered or should have been discovered**; however, even as to actions filed within one year from the date of such discovery, in all events such actions shall be filed at the latest within three years from the date of the alleged act, omission, or neglect. (Emphasis added).
>
> * * *
>
> E. The peremptive period provided in Subsection A of this Section shall not apply in cases of fraud, as defined in Civil Code Article 1953.

Louisiana Civil Code Article 1953 provides that, "Fraud is a misrepresentation or a suppression of the truth made with the intention either to obtain an unjust advantage for one party or to cause a loss or inconvenience to the other. Fraud may also result from silence or inaction." Louisiana Code Civil Procedure Art. 856 also requires that, "In pleading fraud or mistake, the circumstances constituting fraud or mistake shall be alleged with particularity. Malice, intent, knowledge, and other condition of mind of a person may be alleged generally." Fraud cannot be predicated on mistake or negligence, no matter how gross. Fraudulent intent, which constitutes the intent to deceive, is a necessary element of fraud. *Whitehead v. American*

Coachworks, Inc., 02-0027, p. 6 (La. App. 1 Cir. 12/20/02), 837 So.2d 678, 682.

Plaintiff's petition, filed in proper person, does not sufficiently set forth the particular allegations of fraud that would exempt him from the preclusive effect of the peremption statute. Additionally, the Trial Court based its ruling denying Mrs. Amos' exception of prescription on an erroneous interpretation of the law. La. R.S. 35:200 provides that any actions for damages shall be filed "**within one year from the date of the alleged act**, omission, or neglect, or within one year from the date that the alleged act, omission, or neglect is discovered or should have been discovered." The Trial Court, however, held that the plaintiff had met his burden by filing **within one year of learning the name of the notary** that he contends committed a tortuous act, and not one year from when he discovered the alleged act. (R.pp. 154-155). This same Trial Court dismissed a lawsuit Mr. King filed against Ms. Colston on August 17, 2024, finding that his case had prescribed. (R.pp. 59-62).

As plaintiff failed to allege or prove any fraud or intent on the part of Ms. Amos to deceive Mr. King, this case prescribed on October 29, 2022 and is not subject to Subsection E of 35:200. Therefore, it was error for the Trial Court to deny Hartford and Mrs. Amos' exception of prescription, and this appeal should be dismissed.

II). The Trial Court did not erroneously apply the wrong burden of proof. After plaintiff proved he was out of state at the time the Notary allegedly notarized his signature to the title transfer, the burden of proof should not have shifted back to Mrs. Amos to prove she properly identified John Clifford King as the signor.

Plaintiff's counsel believes that after the court found Mr. King to be credible, despite he and his only witness/wife both being caught by the court fabricating stories, the burden of proof should have shifted to Mrs Amos to exculpate herself.

The case cited by plaintiff, *Lawrence v. Government Employees Insurance Company*, 13-1296 (La.App. 4 Cir. 10/15/14), 151 So.3d 917 as well as the cases cited in *Lawrence*, are distinguishable as they involve personal injury cases, the result of automobile accidents, and not a case where there are allegations of intentional fraud or deception. Nevertheless, Mrs. Amos testified and was found to credible and free from fault by a preponderance of the evidence.

In his Memorandum of Law, plaintiff cites *Collins v. Collins*, 629 So.2d 1274, 1276 (La. App. 5 Cir. 1993), *writ denied*. 94-0422 (La. 4/4/94), 635 So.2d 1110, in answering the question he poses to himself, "**IS A NOTARY LIABLE FOR FAILING TO IDENTIFY THE SELLER IN A BILL OF SALE? YES!**" This question, however, is misleading and so is the *Collins* decision.

Collins merely held that a notary **may** be liable both for deliberate misfeasance in the course of his official duties and for negligence in performing those duties. **The court in that case reversed the granting of the defendants' exceptions of no cause of action, finding that the plaintiff had stated a cause of action** against the notary by alleging that the notary violated his notarial obligation by notarizing an act of sale while he knew or should have known that the person signing was not who they purported to be and/or by failing to request identification. *Collins*, 629 So.2d at 1277.

The court in *Collins* only addressed the exception of no cause of action filed by defendant. The court did not make the ultimate determination as to whether the defendant committed deliberate misfeasance and/or negligence. The cases relied on by *Collins* and cited in plaintiff's brief can also be distinguished. In *Summers Brothers, Inc. v. Brewer*, 420 So. 2d 197, 204 (La.App. 1 Cir. 1982), the first circuit relied upon decisions involving active fraud by the notary, including *Lacour* and

Rochereau, to reach the conclusion that the notary committed fraud when he authenticated a document after it was previously signed, despite the fact that the notary was unaware the signatures were forgeries.[5] Also cited is *Levy v. Western Casualty & Surety Co.*, 43 So.2d 291 (2nd Cir. 1949), which recognized that under certain circumstances, a notary could be negligent for failing to get proof of identification from a person signing a document in his presence, and *Webb v. Pioneer Bank & Trust* Co., 530 So.2d 115 (2nd Cir. 1988), where the second circuit found that the notary who notarized the note in the mortgage but could not recall whether the wife's signature was affixed in his presence was negligent for failing to exercise ordinary care in ascertaining the genuineness of the signature allegedly fixed in his presence.

Mrs. Amos, a Notary for over twenty years, testified it is always her practice to check identification and watch the parties affix their signatures. She sees numerous people in a day. If Mrs. Amos had any suspicions, she would call her local Justice of the Peace. (R.pp. 665, 667-668). Plaintiff contends that Mrs. Amos's responses that she did not recall this particular transaction, but that she always get identification, but does not keep copies, is an inadequate defense. (Plaintiff's brief, p. 11). This is plaintiff's feelings regarding the matter. Plaintiff fails to cite any law or jurisprudence requiring a Notary to do more. Undersigned counsel could not find anywhere in the Fundamentals of Louisiana Notarial Law and Practice handbook where a Notary is required to keep copies.

"The notary must exercise the care of a reasonable 'prudent businessman' in

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[5] *Lacour v. National Surety Co. of New York*, 147 La. 586, 85 So. 600 (La. 1920); and *Roche re reau v. Jones*, 29 La.Ann. 82 (La. 1877).

ascertaining the identity of an affiant or a party executing a document. *Howcott v. Talen*,(see below). A state issued drivers license bearing a photograph of the party is customary identification document required by notaries. Louisiana Department of Public Safety also issues an identification card for non-drivers. A United States passport or military identification is also considered proof of identity."[6]

In the case of *Howcott v. Talen*, 133 La. 845, 63 So. 376 (La. 1913), the Supreme Court of Louisiana summarized the responsibility of a notary with regard to identification of persons appearing before him in the following language:

> In fact, so long as he [(the notary)] exercises the precaution of an ordinarily prudent business man in certifying to the identity of the persons who appear before him, it may be doubted whether he has any othet [sic] function to discharge ...

Howcott, 133 La. at 852, 63 So. at 379.

Mrs. Amos did what is required of her as a Notary Public. She is not required to make and keep copies for the last 20 years. It would be especially impossible for a mobile notary to have to make copies. It is not surprising that Mrs. Amos does not remember a particular transaction from 2021. Even Perry Mason would have difficulty remembering all of his clients from his one hundred and fifty plus episodes. Mrs. King is not a facial identification expert or a handwriting expert. Mrs. Amos did not know either party had nothing to gain by committing any fraud or engaging in any deceit. If anything, fraud was committed on Mrs. Amos. As plaintiff himself noted, it is possible that an imposter, in conspiracy with Colston, produced Mr. King's identification. (Plaintiff's brief, p. 13). As Mr. King produced a copy of Ms. Colston's driver's licence in court, it is highly likely she had a copy of Mr. King's. (R.p. 797).

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[6] Jennings, Bullock and Johnson, *Fundamentals of Louisiana Notarial Law and Practice*, p. 47 (2022).

Plaintiff's counsel also seems to believe the Trial Court could not find Mr. King and Mrs. Amos both credible. In *Nelson v. Zurich Insurance Co.*, 247 La. 438, 446, 172 So.2d 70, 72 (1965), the Louisiana Supreme Court observed:

> 'Where witnesses differ, the courts should reconcile, if possible, the apparent contradictions their testimony presents. If this cannot be done, then the probabilities or improbabilities of their respective statements must be considered in the light of their capacity, opportunity or incentive for observation, the amount of corroboration, if any, and the degree of proof required.' *Fridge v. Talbert*, 180 La. 937, 158 So. 209 [(1934)].

The supreme court in *Nelson* at 72 further explained:

> Where the evidence is truly in equipoise and neither of the opposing plaintiffs satisfies the burden of proof by a preponderance of the evidence, must the trial judge nevertheless decide for one of the parties? We think not.

Undersigned counsel disagrees with the Trial Court's decision regarding the credibility of Mr. King and Mrs. King. The documents relied on by Trial Court, allegedly corroborating his story that he was out-of-state, were proffered as they were not properly authenticated and Defense counsel objected to their admission. (R.pp. 814-835).

III). Plaintiff alleges "the Trial Court erred in faulting plaintiff for not calling Charmaine Colston as a witness since Colston was the perpetrator who stole the vehicle; either party could have subpoenaed Colston. But Colston's testimony was unnecessary. The Notary failed to identify John King or anyone else as the signor."

Plaintiff alleges that the Trial Court faulted him for not calling Ms. Colston as a witness. A reading of the minutes and the trial transcript reveals that the Trial Court did not fault plaintiff. The Trial Court merely stated that it would been helpful to have Ms. Colston testify and asked if anybody subpoenaed her. Mrs. King interjected and said Ms. Colston was subpoenaed. Plaintiff's counsel stated he did not have enough time to subpoena her otherwise he would have. (R.p. 752). In its reasons for ruling, the Trial Court stated, "and the Court finds that her [Mrs. Amos'] explanation of what occurred to be reasonable and that indeed, Ms. Colston's testimony could have swayed the Court one way or the other. That being the case, judgment in favor of defendant." (R.p. 760).

It is noted that the minutes incorrectly state that "Ms. Colston's testimony could have swayed the Court but plaintiff failed to subpoena her." (R.p. 7).[7]

CONCLUSION

Hartford Fire Insurance Company and Mrs. Renee Amos, Notary Public, pray that this Honorable Court affirms the judgment of the Lake Charles City Court, Ward 3, as this case had prescribed and Notary, Mrs. Renee Amos did exactly what was expected of her as a Louisiana Notary Public.

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[7] When there is a discrepancy between the minutes and the transcript, the transcript prevails. *State v. Lynch*, 441 So. 2d 732 (La. 1983)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing Appellee brief has been delivered to Oliver "Jackson" Schrumpf, Attorney for Mr. King, 3801 Maplewood Drive, Sulphur, LA 70663, by placing the same in the United States mail, postage prepaid, this __day of March, 2025.

Respectfully submitted:

Edward K. Bauman # 22001
Attorney for Defendants/Respondents
1801 Ryan Street
Lake Charles, LA 70601\
(337) 491-0570
ed@lakecharlesattorney.com

CERTIFICATE OF NO ATTACHMENTS

"I hereby verify that there are no attachments required with this brief."

Edward K. Bauman

Affidavit of Transmission

Attention: John King Fax No. 1-609-378-0076

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: May 2, 2023

Docket No. 23-1206 John King vs. Charmain Colston – 2 pages received – New Suit Petition

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee $250.00
3. A transmission fee of $5 dollars.

Total Amt. Due: $255.00

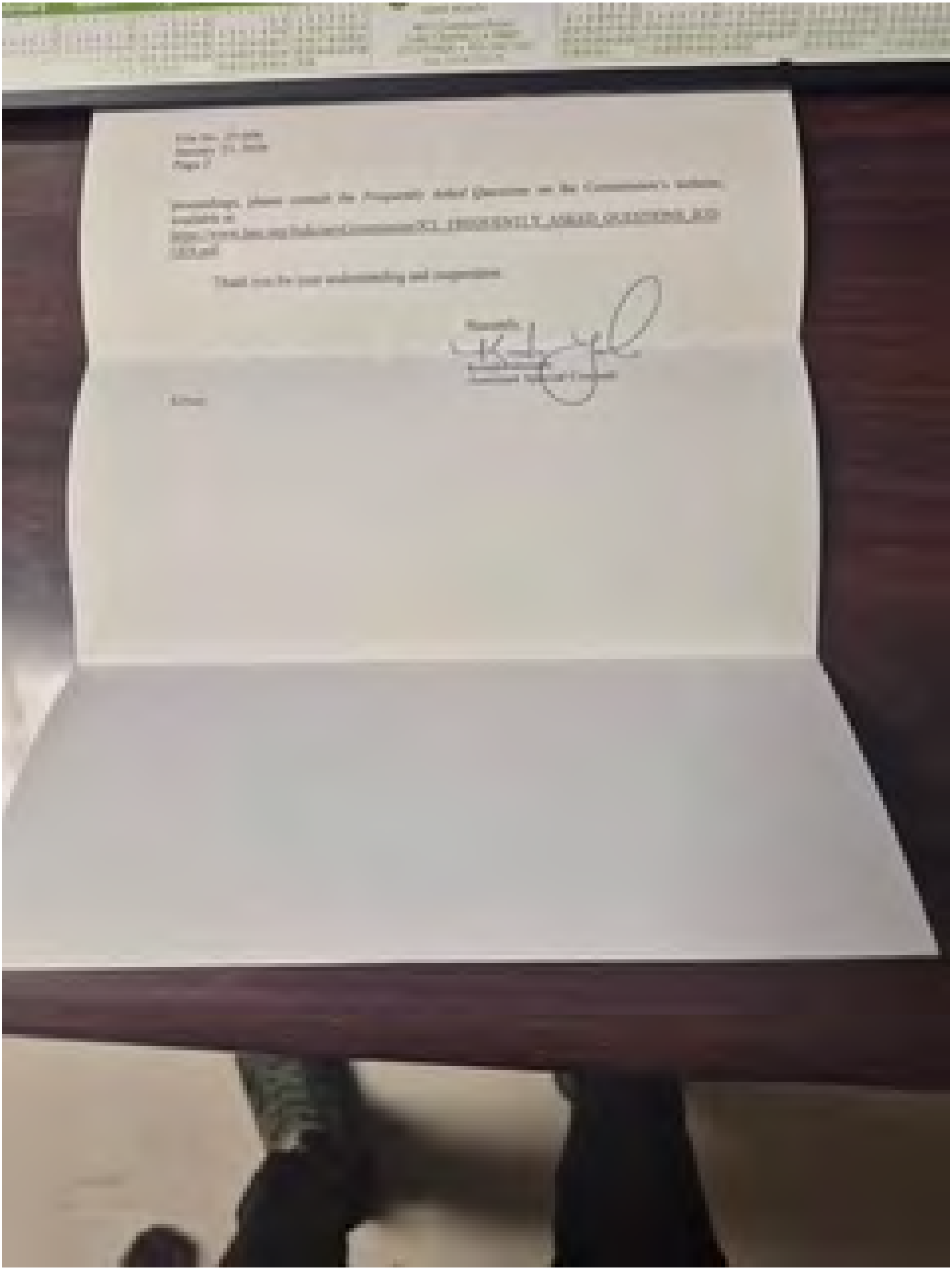
Monica Abshire, Clerk of Court

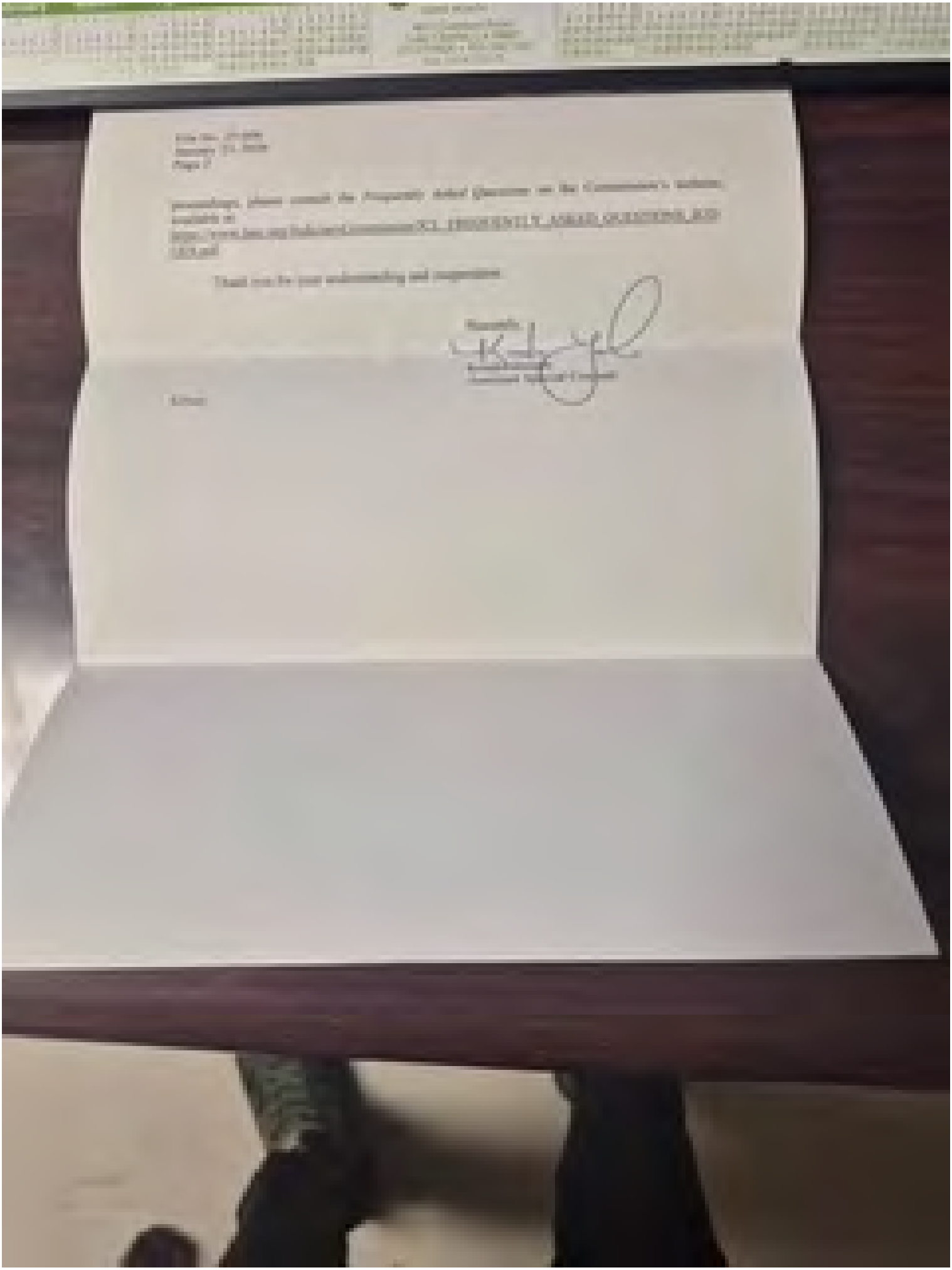
Lake Charles City Court

P. O. Box 1664

Lake Charles, LA 70602


Purell
SURFACE





Suit No.: 23-2124

JOHN CLIFFORD J KING

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Deft. Dep. #764.00

Third party Deposit $2900
Third party Cost $2900

Cost Summary	
Deposits:	$2,505.50
Court Cost:	($2,215.70)
Refund:	$0.00
Balance:	$289.80

Plaintiff Deposits (not including Transcript Deposit) → : $1000.00

Cost to date: $2186.70

Date	*Minutes*			
8/24/2023	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS.	*Code:*	AC	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
8/24/2023	DEFAULT COURT COST	*Code:*	DCC	*ServType:*
		Deposit:		
		Cost:	$56.50	*ServCost:*
8/24/2023	CLAIM: DAMAGESAS PER FAX FILED PETITION (6PAGES); C/SUPPLEMENTAL REPORT(2); CPSO OFFENSE REPORT(4); CPSO CASE REPORT(4) C/WELD INSPECTION(7); C/SOUTHWEST CREDIT UNION DOCS(2); C/CAPITAL ONE(7); C/REGISTRATION(1); C/VEHICLE APPLICATION(1); CASE REPORT SUMMARY(1); C/CERTIFICATE OF TITLE(2); C/LICENSE(1); C/CASE SUMMARY(1) FILED HEREINPETITION (6PAGES) 1/CC 1/CONFEXHIBITS(33)FAX FILING FEE $5.00	*Code:*	CL	*ServType:*
		Deposit:		
		Cost:	$95.00	*ServCost:*

9/1/2023	CITATION ISSUED (RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 AT 1208 17TH STREET LAKE CHARLES LA, 70601)	*Code:*	CII	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
9/5/2023	ADDED DEPOSIT FROM JOHN KING OF $255.00 ADV DEP	*Code:*	PD	*ServType:*	
		Deposit:	$255.00		
		Cost:		*ServCost:*	
9/5/2023	2 COPIES OF THE PETITION 1 FOR SERVICE, 1 FOR PLT12 PAGES @ $2.00	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$24.00	*ServCost:*	
9/12/2023	DEFENDANT RENEE AMOS PEREMPTORY EXCEPTIONS OF PRESCRIPTION, RULE TO SHOW CAUSE, C/JUDGMENT OF DISMISSAL WITH PREJUDICE, C/CPSO SUPPLEMENTAL NARRATIVE /INITIAL REPORT, C/CPSO OFFENSE REPORT RECEIPT, AND C/CASE REPORT FILED HEREIN.**ORDER SIGNED BY JUDGE JAMIE B. BICE 9/13/2023**EXCEPTIONRULE1 AT $6 EACH9 AT $2 EACH1 CONFORMED COPY TO ATTY DOMINIC1 CC TO BE SERVED TO PLTF	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$44.00	*ServCost:*	
9/12/2023	ADDED DEPOSIT FROM KAMIE DOMINIC OF $150.00 ADD DEP FOR EXCEPTION	*Code:*	DD	*ServType:*	
		Deposit:	$150.00		
		Cost:		*ServCost:*	
9/20/2023	HEARING NOTICE OF EXCEPTION RULE SET FOR WEDNESDAY 11/15/2023 AT 9:00 AM MAILED TO DEFT ATTY., KAMIE T. DOMINIC	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

9/20/2023	RULE: EXCEPTION DATE: WEDNESDAY 11/15/2023 AT 9:00 AM	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	
9/20/2023	CITATION ORDER ISSUED TO: (KING, JOHN CLIFFORD J AT 123 N. LOUISIANA AVENUE LAKE CHARLES LA 70601) EXCEPTION	*Code:*	CIO	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
11/7/2023	FAX FILED MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/08/23.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
11/13/2023	RECEIVED ORIGINAL MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/16/23.MOTION/2CCDOCS/2EXHIBITS/6COPIES/18	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$76.00	*ServCost:*	
11/13/2023	CC / JOHN KINGADD DEP / FOR MOTIONS TO CONTINUE AND QUASH	*Code:*	PD	*ServType:*	
		Deposit:	$255.00		
		Cost:		*ServCost:*	
11/28/2023	HEARING NOTICE FOR EXCEPTION SET FOR WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM MAILED TO DEFENDANT, RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC.	*Code:*	NO	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
11/28/2023	NOTICE OF MOTION FOR CONTINUANCE AND MOTION TO QUASH ISSUED TO: RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC AT 1400 RYAN ST., LAKE CHARLES, LA 70601	*Code:*	JF	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00

11/28/2023	RULE REFIXED: EXCEPTIONDATE: WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	
11/28/2023	CITATION ORDER ISSUED TO WITH C/MOTION FOR CONTINUANCE AND MOTION TO QUASH: JOHN CLIFFORD J KING AT 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601	*Code:*	CIO	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
1/4/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
1/5/2024	CC / JOHN KINGADD DEP / FOR FAX FILING FEE AND SUBPOENA	*Code:*	PD	*ServType:*	
		Deposit:	$55.00		
		Cost:		*ServCost:*	
1/5/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	*Code:*	SUB	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
1/16/2024	FAX FILED - MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
1/17/2024	RULE: EXCEPTION (RE-FIXED)DATE: THURSDAY, JANUARY 25, 2024 @ 9:00 AM**2 NOTICES MAILED**	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	

1/17/2024	PLTF FAILS TO APPEAR; DEFT APPEARS W/ATTY; MOTION TO CONTINUE GRANTED; CONTINUED UNTIL 1/25/2024 @ 9:00 AM; NOTICE TO BE SENT TO BOTH PARTIES. RCR	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
1/17/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $0.00	*ServCost:*		
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $0.00	*ServCost:*		
1/17/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	*Code:* SUB	*ServType:* MF3		
		Deposit:			
		Cost: $10.00	*ServCost:*	$30.00	
1/19/2024	REQUEST FOR A COPY OF THE EXCEPTIONS FILED HEREIN BY DEF ATTY KAMIE T DOMINIC	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $6.00	*ServCost:*		
1/19/2024	1 COPY OF DEFENDANT PEREMPTORY EXECEPTIONS OF PRESCRIPTION4 PAGES @ $2.00	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $8.00	*ServCost:*		

1/19/2024	ADDED DEPOSIT FROM KAMIE T. DONINIC OF $14.00 ADD DEP/CF OF PEREMPTORY EXECEPTIONS	*Code:* DD *Deposit:* $14.00 *Cost:*		*ServType:* *ServCost:*
1/22/2024	RECEIVED ORIGINAL LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.REQUESTDOC/1EXHIBIT/1	*Code:* JF *Deposit:* *Cost:*	$14.00	*ServType:* *ServCost:*
1/22/2024	ADDED DEPOSIT FROM JOHN KING OF $80.00 /SUBPOENA	*Code:* PD *Deposit:* $80.00 *Cost:*		*ServType:* *ServCost:*
1/23/2024	RECEIVED ORIGINAL MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE. **SIGNED BY JUDGE ** EXHIBIT ATTACHED (3 PAGES)MOTION/ORDEREXH - 3 PAGES	*Code:* JF *Deposit:* *Cost:*	$18.00	*ServType:* *ServCost:*
1/23/2024	LETTER TO CONTEST COURT FEES FOR JANUARY 17, 2024 FILED HEREIN BY PLTF **BUT NOT SIGNED**	*Code:* JF *Deposit:* *Cost:*	$6.00	*ServType:* *ServCost:*
1/24/2024	FAXED LETTER FILED HEREIN BY ATTY ORELIA R. LAWDINS-TRENT INFORMING THE COURT OF THE RECEIVED SERVICE OF A SUBP (ISSUED AT PLTF REQUEST) FOR CHARMAINE Y. COLSTON, AS THEY DO NOT REPRESENT MS. COLSTON IN THIS MATTER & SHE IS NOT A PARTY TO THIS PROCEEDING; SINCE OFFICE IMPROPERLY SERVED, HAS NOT FORWARDED TO MS. COLSTON; ADDITIONALLY CANNOT ASSUME ANY RESPONSIBILITY FOR HER APPEARANCE OR REQUIRE HER PRESENCE AT ANY HEARINGS IN THIS MATTER	*Code:* JF *Deposit:* *Cost:*	$6.00	*ServType:* *ServCost:*

1/25/2024	PLTF APPEARS THRU ATTY, DUSTAN ABSHIRE; DEFT APPEARS WITH ATTY, KAMIE DOMINIC; PRE-TRIAL CONFERENCE HELD; DUSTAN ABSHIRE APPEARS TODAY FOR THE LIMITED PURPOSE OF THIS EXCEPTION HEARING; ARGUMENT AND INFORMATION GIVEN; EXCEPTION REQUEST IS OVERRULED; OBJECTION TO RULING NOTED FOR THE RECORD; MATTER SET FOR TRIAL ON THURSDAY, MARCH 21, 2024 AT 9:00 AM; NOTICE GIVEN IN OPEN COURT AND TO BE MAILED. RCR	*Code:* JF *Deposit:* *Cost:* $7.00	*ServType:* *ServCost:*
2/7/2024	NOTICE OF ANSWER FILED HEREIN BY DEFENDANT RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 ISSUED TO PLTF JOHN KING, 123 N LOUISIANA AVENUE, LAKE CHARLES, LA 70601	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:* $30.00
2/7/2024	ANSWER FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; FAX: 337-426-8763; *CERTIFICATE OF SERVICE*ANSWER (2 PAGES)/1CC	*Code:* JF *Deposit:* *Cost:* $13.00	*ServType:* *ServCost:*
2/8/2024	ADDED DEPOSIT FROM KAMIE DOMINIC FOR ANSWER OF $25.00	*Code:* DD *Deposit:* $25.00 *Cost:*	*ServType:* *ServCost:*
2/23/2024	REQUEST FOR CERTIFIED COPIES RECEIVED BY CHARMAINE COLSTON. **NOTIFIED COST FOR CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00 PLUS REQ. $6.00 TOTAL AMT. REQUIRED - $29.00**	*Code:* NO *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
2/27/2024	REQUEST FOR CERTIFIED COPIES FILED HEREIN BY CHARMAINE COLSTON.	*Code:* JF *Deposit:* *Cost:* $6.00	*ServType:* *ServCost:*

Backed out this cost

2/27/2024	CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$23.00	*ServCost:*
2/27/2024	ADDED DEPOSIT FROM CREDIT CARD/CHARMAINE COLSTON FOR CERTIFIED COPIES OF $29.00	*Code:*	TPD	*ServType:*
		Deposit:	$29.00	
		Cost:		*ServCost:*
3/7/2024	TRIAL FIXED FOR THURSDAY, MARCH 21, 2024 @ 9:00 AM; 2 NOTICES MAILED.	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$8.00	*ServCost:*
3/7/2024	FAX FILED - REQUEST FOR SUBPOENA W/ATTACHED WITNESS SUBP. ACKNOWLEDGEMENT FORM FILED HEREIN BY PLTF IN PROPER PERSON. **REQUEST TO SERVE ATTY ORELIA LAWDINS-TRENT C/O HER CLIENT CHARMAINE COLSTON, LAWDINS GALLIEN FIRM, 1504 MARTIN LUTHER KING HWY STE A, LAKE CHARLES, LA 70601**FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*
		Deposit:		
		Cost:	$7.36	*ServCost:*
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*
		Deposit:		
		Cost:	$7.36	*ServCost:*

Backed out this cost

Do not give credit for this Deposit

3/11/2024	**PER JUDGE RICHARD - DISREGARD PLTFS REQUEST FOR SUBP TO BE SERVED TO ATTY ORELIA LAWDINS TRENT C/O HER CLIENT CHARMAINE Y. COLSTON - REFER TO ATTY ORELIA LAWDINS-TRENTS LETTER FILED INTO THE RECORD ON 1/24/2024 WHEREIN SHE ADVISED THE COURT SHE IS NOT THE ATTY OF RECORD FOR MS. COLSTON, AS SHE IS NOT A PARTY IN THIS MATTER**	*Code:* NO *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*	
3/19/2024	MOTION TO CONTINUE (2 PAGES); ORDER TO REFIX TRIAL FILED HEREIN BY DEFT THRU ATTY KAMIE T. DOMINIC **PLTF OPPOSES**MOTION (2 PAGES)/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $24.00	*ServType:* *ServCost:*		
3/19/2024	ADDED DEPOSIT FROM KAMIE TRAMAIN DOMINIC OF $100.00	*Code:* DD *Deposit:* $100.00 *Cost:*	*ServType:* *ServCost:*		
3/21/2024	TRIAL RE-FIXED DATE: WEDNESDAY, MAY 8, 2024 AT 9:00**NOTICE GIVEN IN OPEN COURT***	*Code:* JF *Deposit:* *Cost:* $8.00	*ServType:* *ServCost:*		
3/21/2024	PLTF APPEARS W/ATTY DUSTAN ABSHIRE; DEFT APPEARS W/ATTYS KAMIE DOMINIC & ED BAUMAN; FTR, OBJECTION TO THE MOTION TO CONTINUE BY PLTF ATTY DUSTAN ABSHIRE, REQUEST DENIED; MOTION TO CONTINUE BY DEFT ATTY KAMIE DOMINIC GRANTED & SIGNED IN OPEN COURT; TRIAL SET FOR WEDNESDAY, MAY 8, 2024 AT 9:00 AM; PLTF ATTY REQUESTS ZOOM COURT FOR MR. KING, REQUEST DENIED; NOTICE GIVEN TO ALL PARTIES IN OPEN COURT. RCR	*Code:* JF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
3/25/2024	NOTICE OF MOTION & ORDER TO CONTINUE & REFIX TRIAL ISSUED TO: (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	

4/25/2024	MOTION TO RECONSIDER DEFENDANT RENEE AMOS PEREMPTORY EXCEPTION OF PRESCRIPTION; MEMORANDUM IN SUPPORT OF MOTION TO RECONSIDER DEFT PEREMPTORY EXCEPTION (3 PAGES); EXH A (2 PAGES) FILED HEREIN BY DEFT THRU ATTY KAMIE DOMINIC.MOTION/MEMO (3 PAGES)/CC1 EXH (2 PAGES)	*Code:* JF *Deposit:* *Cost:* $25.00	*ServType:* *ServCost:*		
4/25/2024	NOTICE OF MOTION TO RECONSIDER DEFENDANTS PEREMPTORY EXCEPTION OF PRESCRIPTION ISSUED TO (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	
4/25/2024	ADDED DEPOSIT FROM CREDIT CARD/KAMIE TRAMAIN DOMINIC FOR MOTION TO RECONSIDER DEFT EXCEPTION OF $100.00	*Code:* DD *Deposit:* $100.00 *Cost:*	*ServType:* *ServCost:*		
5/8/2024	PLTF APPEARS W/ATTY JOHN CLIFFORD J. KING; DEFT APPEARS W/ATY KAMIE DOMINIC; COURT GRANTS PLAINTIFF'S ORAL MOTION TO RESET HEARING AND TO AMEND PLEADINGS TO INCLUDE HARTFORD LIFE INSURANCE COMPANY; MATTER RE-FIXED UNTIL THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; NOTICES TO BE SENT TO ALL PARTIES. RCR	*Code:* JF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
5/15/2024	TRIAL RE-FIXED FOR THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; 2 NOTICES MAILED.	*Code:* JF *Deposit:* *Cost:* $8.00	*ServType:* *ServCost:*		
5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY DUSTAN J. ABSHIRE, 334 KIRBY ST. LAKE CHARLES, LA 70601	*Code:* PC *Deposit:* *Cost:* $5.04	*ServType:* *ServCost:*		

5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*	
		Deposit:			
		Cost:	$5.04	*ServCost:*	
5/20/2024	FAX FILED - PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTFFAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
5/30/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $5.00	*Code:*	PD	*ServType:*	
		Deposit:	$5.00		
		Cost:		*ServCost:*	
5/31/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTF **UP FOR REVIEW ** DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD**	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
6/4/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD. CC TO PLTF ATTY DUSTAN ABSHIRE.	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$11.00	*ServCost:*	
6/13/2024	SUPPLEMENTING PETITION (2 PAGES); ORDER; AFFIDAVIT AND COVER LETTER FILED HEREINPETITION (2 PAGES)/3CCDOCS/3	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$41.00	*ServCost:*	
6/13/2024	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS. **AMENDING PARAGRAPH 2 AND ADD DEFENDANT HARTFORD FIRE INSURANCE COMPANY**	*Code:*	AC	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

6/13/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM OF $300.00 ADD DEP FOR SUPPLEMENTAL PETITION	*Code:* PD		*ServType:*	
		Deposit: $300.00			
		Cost:		*ServCost:*	
6/14/2024	CHECK REQUEST ID# 21090 FOR PREPAYMENT SERVICE FEE SUBMITTED TO COMPTROLLER	*Code:* NO		*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (RENEE AMOS THRU ATTY: KAMIE T. DOMINIC AT 1400 RYAN ST. LAKE CHARLES LA, 70601)	*Code:* CII		*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (HARTFORD FIRE INSURANCE COMPANY THRU: LOUISIANA SECRETARY OF STATE AT 8585 ARCHIVES AVE BATON ROUGE LA, 70809)**MAILED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE** CK. NO. 038877 ISSUED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE	*Code:* CII		*ServType:*	SF
		Deposit:			
		Cost:	$10.00	*ServCost:*	$40.40
6/17/2024	PREPAYMENT OF SERVICE FEE. CHECK #038725 PAID TO: SECRETARY OF STATES OFFICE	*Code:* SF		*ServType:*	
		Deposit:			
		Cost:	$50.00	*ServCost:*	
6/18/2024	MOTION AND ORDER TO WITHDRAW DUSTAN J. ABSHIRE AS COUNSEL OF RECORD FOR PLTF, JOHN CLIFFORD J KING; ORDER SIGNED BY JUDGE RONALD C. RICHARD ON 6/20/2024; COPY OF LETTER W/EMAIL FILED HEREIN BY ATTY DUSTAN J. ABSHIRE. CERT OF SERVICE. COVER LETTER FILED. COPY TO ATTY ABSHIRE. COPY TO PLTF.CVR LTR/MOTION/ORDER/COPY2 EXH	*Code:* JF		*ServType:*	
		Deposit:			
		Cost:	$25.00	*ServCost:*	

6/20/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM, LLC OF $25.00 ADD DEP MOTION& ORDER TO WITHDRAW AS COUNSEL OF RECORD	*Code:* PD *Deposit:* $25.00 *Cost:*		*ServType:* *ServCost:*
6/21/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO PLTF, JOHN CLIFFORD J KING @ 123 N LOUISIANA AVE, LAKE CHARLES, LA 70601	*Code:* NO *Deposit:* *Cost:*	$0.00	*ServType:* *ServCost:*
6/24/2024	COPY OF PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.**THE ORIGINAL THAT WAS FILED 5/31/2024 ATTACHED TO THIS COPY FOR JUDGE RICHARDS REVIEW** DENIED DUE TO NO 3RD PARTY AFFIANT PROVIDED**	*Code:* JF *Deposit:* *Cost:*	$0.00	*ServType:* *ServCost:*
6/27/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF HAS FAILED TO PROVIDE A THIRD PARTY AFFIANT. CC TO PLTF.ORDER/CC	*Code:* JF *Deposit:* *Cost:*	$11.00	*ServType:* *ServCost:*
7/3/2024	ANSWER FILED HEREIN BY DEFENDANT, HARTFORD FIRE INSURANCE COMPANY, THRU ATTY KAMIE T. DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; CERTIFICATE OF SERVICEANSWER (2 PAGES)	*Code:* JF *Deposit:* *Cost:*	$8.00	*ServType:* *ServCost:*
7/3/2024	ADDED DEPOSIT FROM KAMIE DOMINIC OF $25.00 ADD DEP FOR ANSWER	*Code:* DD *Deposit:* $25.00 *Cost:*		*ServType:* *ServCost:*
7/3/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $10.00	*Code:* PD *Deposit:* $10.00 *Cost:*		*ServType:* *ServCost:*

7/9/2024	SPOKE TO DEFT ATTY KAMIE DOMINIC AND SHE CONFIRMED SHE EMAIL THE ANSWER TO JOHN KING; THEREFORE, IT DID NOT NEED TO BE SERVED	*Code:*	NO	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
7/25/2024	AMENDING & SUPPLEMENTAL MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY DUSTAN J ABSHIRE & SIGNED BY JUDGE RONALD C. RICHARD ON 7/29/2024. CERT OF SERVICE. COVER LETTER FILED. CONF COPY TO ATTY ABSHIRE.CVR LTR/ORDER/COPY**CC MAILED TO PLTF; CC MAILED TO DEFT ATTY**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$15.00	*ServCost:*
7/25/2024	ADDED DEPOSIT FROM DUSTIN J. ABSHIRE OF $15.00 ADD DEP/ MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD	*Code:*	PD	*ServType:*
		Deposit:	$15.00	
		Cost:		*ServCost:*
7/30/2024	FAX FILED -PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*
8/2/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON ** UP FOR JUDGE REVIEW**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
8/13/2024	ORDER FOR PAUPER AFFIDAVIT SIGNED BY JUDGE RONALD C. RICHARD ON 8/13/2024 ** FROM THIS DATE PLTF WILL BE ALLOWED TO PROCEED IN PAUPER STATUS** NOTIFIED PLTF	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
10/31/2024	FAX FILED - MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*

10/31/2024	MOTION IN LIMINE TO EXCLUDE HEARSAY WITNESSES AND EVIDENCE (2 PAGES); ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION (2PGS)/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $24.00	*ServType:* *ServCost:*		
10/31/2024	MOTION TO STRIKE & MOTION FOR SANCTIONS; ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $22.00	*ServType:* *ServCost:*		
10/31/2024	ANSWER TO AMENDED PETITION FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE T DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059ANSWER/1CC	*Code:* JF *Deposit:* *Cost:* $11.00	*ServType:* *ServCost:*		
10/31/2024	NOTICE OF ANSWER TO AMENDED PETITION ISSUED TO (KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	
10/31/2024	ADDED DEPOSIT FROM RENEE E OR PATRICK S AMOS OF $350.00 ADD DEP FOR AMENDED ANSWER. MOTION IN LIMINE & MOTION TO STRIKE	*Code:* DD *Deposit:* $350.00 *Cost:*	*ServType:* *ServCost:*		
11/1/2024	FAX FILED - DEFENDANTS OPPOSITION TO PLAINTIFFS MOTION TO CONTINUE & MOTION TO QUASH (3 PAGES); ORDER FAX FILED HEREIN BY DEFTS THRU ATTY KAMIE DOMINIC. CERT OF SERVICE. COVER LETTER.FAX FILING	*Code:* CF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION IN LIMINE	*Code:* CIO *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	

11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION TO STRIKE & FOR SANCTIONS	*Code:* CIO	*ServType:* MF3		
		Deposit:			
		Cost: $10.00	*ServCost:* $30.00		
11/7/2024	FAX FILED - PLTFS MOTION TO RECONSIDER, MOTIONS TO INTERVENE LACK OF DUE PROCESS, MOTIONS TO DISMISS QUASH; ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	FAX FILED VIA EMAIL - MOTION TO STRIKE AND SEAL CERTAIN LANGUAGE FROM THE RECORD (2PAGES); ORDER; AFFIDAVIT FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	FAX FILED VIA EMAIL - NOTICE OF SUBP TO DEFT ATTY KAMIE T. DOMINIC FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	JUDGE RICHARD CALLED FOR AN INSTANT STATUS HEARING - PLTF APPEARS THRU ATTY OLIVER SCHRUMPF; DEFT APPEARS THRU ATTY KAMIE DOMINIC; 2-WIT SWORN; MOTION TO ENROLL AS COUNSEL OF RECORD FOR PLTF GRANTED & SIGNED; JUDGE RICHARD READ INTO THE RECORD ALL EMAIL PLEADINGS FROM PLTF & HIS SPOUSE RECEIVED 10/31/24 TO 11/7/2024; PLTFS MOTION TO CONTINUE TRIAL DENIED; COURT INFORMS DEFT ATTY THAT HER 10/31/24 MOTIONS FILED WOULD BE DENIED DUE TO UNTIMELINESS; COUNSEL K. DOMINIC WITHDRAWS MOTIONS & O. SCHRUMPF RENDERED HIS OPPOSITIONS MOOT; COURT ORDERED A REPORT BY DOCTOR CONFIRMING PLTF CANNOT TRAVEL. UPON RECEIPT JUDGE RICHARD WILL GRANT PLTF REQUEST TO APPEAR VIA ZOOM; MRS. KING & COUNSEL MUST APPEAR LIVE. (DR. REPORT DUE BY MONDAY, 11/11/2024). RCR	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $9.00	*ServCost:*		

11/7/2024	MOTION TO ENROLL AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY OLIVER JACKSON SCHRUMPF & SIGNED BY JUDGE RONALD C. RICHARD 11/7/2024. CERT OF SERVICE. CONF COPY TO PLTF ATTY.MOTION/CONF COPY	*Code:* JF *Deposit:* *Cost:* $9.00	*ServType:* *ServCost:*
11/7/2024	MOTION & ORDER TO CONTINUE NOV. 14, 2024 TRIAL FILED HEREIN BY PLTF THRU ATTY ***DENIED BY JUDGE RONALD C. RICHARD***	*Code:* JF *Deposit:* *Cost:* $6.00	*ServType:* *ServCost:*
11/8/2024	RECEIVED ORIGINAL MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. ATTACHED EXHIBITS (8 PAGES)MOTION (4 PAGES)/ORDER2 DOCSEXHIBITS (8 PAGES)	*Code:* JF *Deposit:* *Cost:* $46.00	*ServType:* *ServCost:*
11/12/2024	PRE-TRIAL BRIEF (4 PAGES) FILED VIA EMAIL BY PLTF THRU ATTY OLIVER SCHRUMPF.	*Code:* CF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*
11/14/2024	PLTF APPEARS W/ATTY OLIVER SCHRUMPF; DEFT APPEARS W/ATTY KAMIE DOMINIC; 5 WITS SWORN; 10 DOCS INTRO (34 PAGES); PLAINTIFF FAILED TO PROVE BY PREPONDERANCE OF EVIDENCE THAT AMOS DID ANYTHING INCORRECT IN PROCESSING THIS MATTER, MS. COLSTON'S TESTIMONY COULD HAVE SWAYED THE COURT BUT PLAINTIFF FAILED TO SUBPOENA HER; COSTS AWARDED TO PLAINTIFF; FORMAL JUDGMENT TO BE SIGNED UPON PRESENTATION; HEARING ON MOTION FOR CONTEMPT; COURT HOLDS JOHN KING IN DIRECT CONTEMPT OF COURT AND FINED $500.00. RCR	*Code:* JF *Deposit:* *Cost:* $85.00	*ServType:* *ServCost:*
11/14/2024	CONTEMPT OF COURT FINE ASSESSED TO PLTF, JOHN CLIFFORD KING IN THE AMOUNT OF $500.00	*Code:* CF *Deposit:* *Cost:* $500.00	*ServType:* *ServCost:*

ORig to 10/31/24 Fax Filing

11/15/2024	RULE TO SHOW CAUSE ORDER FOR SHUNTE KING TO APPEAR & SHOW CAUSE WHY SHE SHOULD NOT BE HELD IN CONTEMPT OF COURT, PURSUANT TO LSA - CCP ART 222 FILED HEREIN & SIGNED BY JUDGE RONALD C. RICHARD**RULE WILL BE SET UPON SERVICE INSTRUCTIONS OBTAINED**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
11/15/2024	EMAIL REQUEST FOR ESTIMATED COST OF TRIAL TRANSCRIPT BY PLTF ATTY OLIVER SCHRUMPF ** TESTIMONY APPROXIMATELY 2 HOURS / REGULAR (WITHIN 30 DAYS) 150 PAGES X $4.75/PAGE = $712.50 / RUSH (WITHIN 10 DAYS) 150 PAGES X $5.50/PAGE = $825.00** PROVIDED TO MR. SCHRUMPF VIA EMAIL	*Code:*	NO	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - PLTFS MOTION TO RECONSIDER, MOTIONS TO INTERVENE LACK OF DUE PROCESS, MOTIONS TO DISMISS QUASH; ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF.DOCS/6	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$36.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - MOTION TO STRIKE AND SEAL CERTAIN LANGUAGE FROM THE RECORD (2PAGES); ORDER; AFFIDAVIT FILED HEREIN BY PLTF.DOCS/3EXH (14 PAGES)	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$46.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL EXHIBIT 1FILED HEREIN BY PLTF.EXH 15 PAGES	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$30.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - NOTICE OF SUBP TO DEFT ATTY KAMIE T. DOMINIC FILED HEREIN BY PLTF.	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
11/19/2024	RULE: TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KINGDATE: WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM	*Code:*	RU	*ServType:*
		Deposit:		
		Cost:	$4.00	*ServCost:*

Orig. to 11-7-2024 Fax Filing

Orig. to 11-7-2024 Fax Filing

Orig. to 11-7-2024 Fax Filing

11/19/2024	CITATION ORDER ISSUED (SHUNTE KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601 OR 1648 PAVILLION DR., IOWA, LA 70647)CONTEMPT OF COURTSENT TO CALCASIEU PARISH SHERIFF	*Code:* CIO *Deposit:* *Cost:* $10.00	*ServType:* *ServCost:*
11/19/2024	HEARING NOTICE FOR RULE TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KING SET FOR WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM MAILED TO ATTORNEY OLIVER JACKSON SCHRUMPF	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/19/2024	HEARING NOTICE FOR RULE TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KING SET FOR WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM MAILED TO ATTORNEY KAMIE T. DOMINIC	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/20/2024	LETTER REQUEST FOR COPY OF TRIAL TRANSCRIPT (REGULAR - WITHIN 30 DAYS) FILED HEREIN BY PLTF THRU ATTY OLIVER SCHRUMPF.	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/20/2024	ADDED DEPOSIT FROM CK/SCHRUMPF LAW OFFICE FOR TRIAL TRANSCRIPT OF $712.50 Deposit goes toward Transcript	*Code:* PD *Deposit:* $712.50 *Cost:*	*ServType:* *ServCost:*
11/21/2024	JUDGMENT READ & SIGNED BY JUDGE RONALD C. RICHARD **IN FAVOR OF DEFT, RENEE AMOS & AGA PLTF, JOHN CLIFFORD J KING, DISMISSING WITH PREJUDICE, ALL COSTS ASSESSED TO PLTF, JOHN CLIFFORD J KING** CC TO PLTF ATTY SCHRUMPF; CC TO DEFT ATTY DOMINIC.ORDER/2CC	*Code:* JU *Deposit:* *Cost:* $16.00	*ServType:* *ServCost:*
11/21/2024	NOTICE OF JUDGMENT MAILED TO (JOHN CLIFFORD J KING THRU ATTY OLIVER JACKSON SCHRUMPF @ 3801 MAPLEWOOD DR., SULPHUR, LA 70663)	*Code:* NJ *Deposit:* *Cost:* $10.00	*ServType:* *ServCost:*

11/21/2024	NOTICE OF JUDGMENT MAILED TO (RENEE AMOS THRU ATTY KAMIE T. DOMINIC @ 1400 RYAN ST., LAKE CHARLES, LA 70601)	*Code:*	NJ	*ServType:*	
		Deposit:			
		Cost:	$10.00	*ServCost:*	
11/21/2024	CLERK CERTIFICATE CERTIFYING NOTICE OF JUDGMENT MAILED TO PLTF THRU ATTY OLIVER JACKSON SCHRUMPF AND TO DEFT, RENEE AMOS THRU ATTY KAMIE T. DOMINIC. COPY TO PLTF ATTY; COPY TO DEFT ATTY.	*Code:*	NO	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

JOHN CLIFFORD J KING	**:**	**LAKE CHARLES CITY COURT**
VS. NO. 23-2124	**:**	**PARISH OF CALCASIEU**
RENEE AMOS **NOTARY PUBLIC** **NOTARY ID #29374**	**:**	**STATE OF LOUISIANA**
FILED: _____	**:**	**_____** **DEPUTY CLERK**

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

To: John King
123 N. Louisiana Avenue
Lake Charles, LA 70601

NOW COMES, RENEE AMOS who requests that JOHN KING answer under oath, in accordance with the provisions of Articles 1457 through 1459 of the Louisiana Code of Civil Procedure, the Interrogatories, Request for Production of Documents, and Request for Admissions set forth below. In responding to these Interrogatories and Request, RENEE AMOS requests that you furnish all information as is available to you, and answer each Interrogatory and Request separately, fully, in writing and under oath, unless it is objected to, in which event the reasons for the objections shall be stated in lieu of the answer. The answers are to be signed by the person making them. These Interrogatories and Requests are to be as continuing, and if your answer to any Interrogatory and Request materially changes after the time the answers are filed, you are requested to supplement your answers to reflect same. Please take notice that a copy of the answers must be served upon the attorney for RENEE AMOS within fifteen (15) days after the service of these Interrogatories, Request for Production of Documents, and Request for Admissions.

INTERROGATORIES

INTERROGATORY NO. 1:

State your name, residential address in Lake Charles, Louisiana, during September 2021, when the vehicle title in question was signed.

A. John King Sr
123 N. Louisiana Avenue
Lake Charles, LA 70601

INTERROGATORY NO. 2:

Please specify your work address in New Jersey during September 2021 and provide the names and contact information of any supervisors, colleagues, or coworkers who can verify your presence at work in New Jersey.

Work: Various sites between NJ, PA, and NY

1. Vincent Lau - Princeton NJ
2. Justin Lewis- New York, NY
3. Jason DeJesus- Jersey City, NJ
4. Romeo Delacruz - Hillside, NJ
5. Chris Keaton, Calcasieu Parish, La
6. Chanel Alexander, New York,NY

7. Bill Waterson - Edison, New Jersey
8. Charlie Thomas - Pittsburgh, PA
9. Shane Jenson - Little Rock, Arkansas
10. Shunte King, Claremont, California
11. Chad Plummer, Harrison NJ

INTERROGATORY NO. 3:

Please describe your typical work schedule during September 202, including regular work hours, days off, and any periods of leave or absence.

-Which year is counsel referring to and work at which Job?

INTERROGATORY NO. 4:

Please explain how you became aware of the signing of the vehicle title and whether you received any communication about it while residing in Lake Charles or working in New Jersey.

- became aware that a vehicle title and bill of sale were notarized by Renee Amos once the official investigative report was released November 2022 prior to that I was told by detective castille that names of ppl being investigation could not be released until after investigation.
- I have never met Renee Amos nor has Renee Amos provided any communication nor anyone else about the "signing of the vehicle title". I have never been a resident of New Jersey.

INTERROGATORY NO. 5:

Please provide all email correspondence and written communication exchanged between yourself and both the Calcasieu Parish Sheriff's Office and the Calcasieu Parish District Attorney's Office.

- **all official correspondence must be stamped by the investigative unit and must be obtained by official request. Additionally this question is too broad does not specify case #, dates or time period, I do not have access to all correspondence on the matter Defendants Attorney can request case file of the specific investigation by case number but I cannot answer this question because I do not see all correspondence between DA and Sheriff office and I also dont know the dates and cases. To find all correspondence since age 18 until now is cumbersome.**

INTERROGATORY NO. 6:

State whether you granted anyone power of attorney or delegated authority to sign the vehicle title on your behalf during September 2021.

- **I did not as it would not have been possible. I have a signed affidavit of non marriage from June 2021 notarized that specifically states that noone has been given that power to date. Please specify durable power of attorney or power of attorney. I have not delegated any authority to transfer any assets with a lien against them its impossible.**
-

INTERROGATORY NO. 7:

Please provide information about any travels you made during September 2021, including trips between Lake Charles, Louisiana, and New Jersey.

I John King Sr did not travel at all physically to the state of Louisiana September 2021. At no time was my physical presence in the state of Louisiana.

INTERROGATORY NO. 8:

Please provide any witnesses who can attest to your presence or absence in Louisiana during the time when the vehicle title was signed. Please provide their names and contact information.

1. John King Jr- Calcasieu Parish,LA
2. Jayla E. King- Calcasieu Parish, LA
3. Justin King - Calcasieu Parish, LA
4. Monica King - Calcasieu Parish, LA
5. James King Sr - Calcasieu Parish, LA

6. Jade King - Calcasieu Parish, LA
7. Shunte King - Claremont, California
8. Faye Guillory- Calcasieu Parish, LA
9. Essex County Sheriffs Department - Ironbound, NJ
10. Woodbridge Suites security cameras and staff Plainfield, NJ
11. Vincent Lau - Princeton NJ
12. Justin Lewis- New York, NY
13. Jason DeJesus- Jersey City, NJ
14. Romeo Delacruz - Hillside, NJ
15. Chris Keaton, Calcasieu Parish, La
16. Chanel Alexander, New York,NY
17. Bill Waterson - Edison, New Jersey
18. Charlie Thomas - Pittsburgh, PA
19. Shane Jenson - Little Rock, Arkansas
20. Shunte King, Claremont, California
21. Chad Plummer, Harrison NJ
22. Dr. Todd Stitik, West Caldwell NJ
23. Dr Jeevan Patel, Belleville NJ
24. GPS Tracking Drone Vehicle
25. Toll Road Agent Pike 24
26. NJ Transit ticketholder scanned verification
27. Edison Park Fast Electronic Parking System
28. Google GPS 24/7 detections
29. Fitbit Monitor and Breathng Machine Monitor Sleep Apnea GPS location
30. Electronic Card scans that show my entrance and exit times at Woodbridge Suites
31. Park Whiz electronic stamp and verification
32. Dept Homeland Security - TSA Interview for Global Entry - Newark NJ Field Office

INTERROGATORY NO. 9:

Please state how long you have resided in New Jersey and whether you are a resident of the state.

I am a permanent resident of Louisiana address 123 N. Louisiana Avenue Lake Charles, LA. Contract and transient workers, and full time students are not considered for state residency.

INTERROGATORY NO. 10:

Please list, specifically and categorically, any and all documents or other tangible evidence that you may introduce at the trial of this matter.

- **please be specific the questions is burdensome please refer to a specific case number or investigation number other than what can be obtained from Calcasieu Parish Sheriff Department**

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1:

Please produce copies of your paystubs for the last six (6) months

- not available

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2:

Please produce copies of your W2s and your Federal and State income tax returns for the last three (3) years.

- **not available, relevance to this case? Has Amos provided these?**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3:

Please provide each and every item of documentary evidence that you may use at the trial hereto, including documents, reports, papers, statements, photos, diagrams, maps, video tapes, audio tapes, or any other evidence and state who originated each item of documentary evidence and whose possession it is presently in. **This Request for Production is intended to be all inclusive and continuing and at any time it is determined that any item of documentary evidence may use at trial you are required to supplement your answers. Notice is given that any item of documentary evidence not disclosed will be objected to at trial.**

- **Please be specific as this is burdensome and I cannot control what is available through District Attorney office or when it becomes available as it must be requested in writing and paid for**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4:

Please produce any and all copies of documents listed in your Response to Interrogatory No. 2.

- Question makes no sense, documents other than names listed

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5:

Please produce any and all copies of documents that support your Response to Interrogatory No. 3

- Question was incomplete does not specify a year therefore impossible to answer

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6:

Please produce any and all copies of documents that support your Response to Interrogatory No. 5.

Counsel must request their own copy of official stamped documents from the Calcasieu Sheriff Department there is a form that must be filled out and a fee assessed. I dont know the case #, timeframe or specifics. Better to request directly from them.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 7:

Please produce any and all copies of documents that support your Response to Interrogatory No. 6.

- **not available**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 8:

Please produce any and all copies of documents that support your Response to Interrogatory No. 7.

- **please be specific as to travels because of public transportation system this can be burdensome to keep up with daily subway, and train commute detail for every movement. Travels via plane, automobile, etc please be specifi**c

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 9:

Please produce any and all copies of documents that support your Response to Interrogatory No. 8.

- **Please clarify the question and provide examples of what types of documents could pertain to the answers provided**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 10:

Please produce any and all copies of documents that support your Response to Interrogatory No. 9.

- **This is provided in my initial petition written August 2023**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 11:

Please produce any and all copies of documents that support your Response to Interrogatory No. 10.

-please be specific the questions is burdensome please refer to a specific case number or investigation number other than what can be obtained from Calcasieu Parish Sheriff Department

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 12:

Please produce a copy of any and all documents you contend supports or refutes any claim, defense, or allegation made in this Action by any party to this Action, or that you otherwise believe relates to the subject matter of this Action, that you have not already produced in response to any other request.

- **Documentation supplied to Calcasieu Parish Sheriff Dept can be obtained by official request for the investigation and file**

Respectfully submitted,

_____

KAMIE T. DOMINIC, B. R. #40184
Law Office of Kamie T. Dominic LLC.
1400 Ryan Street
Lake Charles, LA 70601
Phone: 337-393-7059
Fax: 337-426-8763
Email: kamiedominiclaw@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served on Plaintiff, John King, via facsimile and/or electronic transmission and/or by United States mail, properly addressed and postage prepaid on this _____ day of _____, 2024.

_____

KAMIE T. DOMINIC

The Judiciary Commission of Louisiana

Office of Special Counsel

December 3, 2025

Mrs. Shonte Jones King
[23] N. Louisiana Ave.
Lake Charles, LA 70[6]

Re: Our File No. 25-[6]06

Dear Mrs. King:

We received your complaint on November 18, 2025. In your complaint you mentioned enclosing attachments. There were no attachments to your complaint. Please send those to my attention so that the attorney can review your complaint.

Sincerely,

Christine Mills

Christine Mills

The Judiciary Commission of Louisiana

Office of Special Counsel

December 3, 2025

Mrs. Shonte Jones King
[23] N. Louisiana Ave.
Lake Charles, LA 70[6]

Re: Our File No. 25-[6]06

Dear Mrs. King:

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Sincerely,

Christine Mills

Christine Mills

Suit No.: 23-2124

JOHN CLIFFORD J KING

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Deft. Dep. #764.00

Third party Deposit $2900
Third party Cost $2900

Cost Summary	
Deposits:	$2,505.50
Court Cost:	($2,215.70)
Refund:	$0.00
Balance:	$289.80

Plaintiff Deposits (not including Transcript Deposit) → : $1000.00

Cost to date: $2186.70

Date	*Minutes*			
8/24/2023	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS.	*Code:*	AC	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
8/24/2023	DEFAULT COURT COST	*Code:*	DCC	*ServType:*
		Deposit:		
		Cost:	$56.50	*ServCost:*
8/24/2023	CLAIM: DAMAGESAS PER FAX FILED PETITION (6PAGES); C/SUPPLEMENTAL REPORT(2); CPSO OFFENSE REPORT(4); CPSO CASE REPORT(4) C/WELD INSPECTION(7); C/SOUTHWEST CREDIT UNION DOCS(2); C/CAPITAL ONE(7); C/REGISTRATION(1); C/VEHICLE APPLICATION(1); CASE REPORT SUMMARY(1); C/CERTIFICATE OF TITLE(2); C/LICENSE(1); C/CASE SUMMARY(1) FILED HEREINPETITION (6PAGES) 1/CC 1/CONFEXHIBITS(33)FAX FILING FEE $5.00	*Code:*	CL	*ServType:*
		Deposit:		
		Cost:	$95.00	*ServCost:*

9/1/2023	CITATION ISSUED (RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 AT 1208 17TH STREET LAKE CHARLES LA, 70601)	*Code:*	CII	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
9/5/2023	ADDED DEPOSIT FROM JOHN KING OF $255.00 ADV DEP	*Code:*	PD	*ServType:*	
		Deposit:	$255.00		
		Cost:		*ServCost:*	
9/5/2023	2 COPIES OF THE PETITION 1 FOR SERVICE, 1 FOR PLT12 PAGES @ $2.00	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$24.00	*ServCost:*	
9/12/2023	DEFENDANT RENEE AMOS PEREMPTORY EXCEPTIONS OF PRESCRIPTION, RULE TO SHOW CAUSE, C/JUDGMENT OF DISMISSAL WITH PREJUDICE, C/CPSO SUPPLEMENTAL NARRATIVE /INITIAL REPORT, C/CPSO OFFENSE REPORT RECEIPT, AND C/CASE REPORT FILED HEREIN.**ORDER SIGNED BY JUDGE JAMIE B. BICE 9/13/2023**EXCEPTIONRULE1 AT $6 EACH9 AT $2 EACH1 CONFORMED COPY TO ATTY DOMINIC1 CC TO BE SERVED TO PLTF	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$44.00	*ServCost:*	
9/12/2023	ADDED DEPOSIT FROM KAMIE DOMINIC OF $150.00 ADD DEP FOR EXCEPTION	*Code:*	DD	*ServType:*	
		Deposit:	$150.00		
		Cost:		*ServCost:*	
9/20/2023	HEARING NOTICE OF EXCEPTION RULE SET FOR WEDNESDAY 11/15/2023 AT 9:00 AM MAILED TO DEFT ATTY., KAMIE T. DOMINIC	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

9/20/2023	RULE: EXCEPTION DATE: WEDNESDAY 11/15/2023 AT 9:00 AM	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	
9/20/2023	CITATION ORDER ISSUED TO: (KING, JOHN CLIFFORD J AT 123 N. LOUISIANA AVENUE LAKE CHARLES LA 70601) EXCEPTION	*Code:*	CIO	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
11/7/2023	FAX FILED MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/08/23.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
11/13/2023	RECEIVED ORIGINAL MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/16/23.MOTION/2CCDOCS/2EXHIBITS/6COPIES/18	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$76.00	*ServCost:*	
11/13/2023	CC / JOHN KINGADD DEP / FOR MOTIONS TO CONTINUE AND QUASH	*Code:*	PD	*ServType:*	
		Deposit:	$255.00		
		Cost:		*ServCost:*	
11/28/2023	HEARING NOTICE FOR EXCEPTION SET FOR WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM MAILED TO DEFENDANT, RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC.	*Code:*	NO	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
11/28/2023	NOTICE OF MOTION FOR CONTINUANCE AND MOTION TO QUASH ISSUED TO: RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC AT 1400 RYAN ST., LAKE CHARLES, LA 70601	*Code:*	JF	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00

11/28/2023	RULE REFIXED: EXCEPTIONDATE: WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	
11/28/2023	CITATION ORDER ISSUED TO WITH C/MOTION FOR CONTINUANCE AND MOTION TO QUASH: JOHN CLIFFORD J KING AT 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601	*Code:*	CIO	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
1/4/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
1/5/2024	CC / JOHN KINGADD DEP / FOR FAX FILING FEE AND SUBPOENA	*Code:*	PD	*ServType:*	
		Deposit:	$55.00		
		Cost:		*ServCost:*	
1/5/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	*Code:*	SUB	*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
1/16/2024	FAX FILED - MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE.FAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
1/17/2024	RULE: EXCEPTION (RE-FIXED)DATE: THURSDAY, JANUARY 25, 2024 @ 9:00 AM**2 NOTICES MAILED**	*Code:*	RU	*ServType:*	
		Deposit:			
		Cost:	$4.00	*ServCost:*	

1/17/2024	PLTF FAILS TO APPEAR; DEFT APPEARS W/ATTY; MOTION TO CONTINUE GRANTED; CONTINUED UNTIL 1/25/2024 @ 9:00 AM; NOTICE TO BE SENT TO BOTH PARTIES. RCR	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
1/17/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $0.00	*ServCost:*		
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $0.00	*ServCost:*		
1/17/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	*Code:* SUB	*ServType:* MF3		
		Deposit:			
		Cost: $10.00	*ServCost:*	$30.00	
1/19/2024	REQUEST FOR A COPY OF THE EXCEPTIONS FILED HEREIN BY DEF ATTY KAMIE T DOMINIC	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $6.00	*ServCost:*		
1/19/2024	1 COPY OF DEFENDANT PEREMPTORY EXECEPTIONS OF PRESCRIPTION4 PAGES @ $2.00	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $8.00	*ServCost:*		

1/19/2024	ADDED DEPOSIT FROM KAMIE T. DONINIC OF $14.00 ADD DEP/CF OF PEREMPTORY EXECEPTIONS	*Code:* DD *Deposit:* $14.00 *Cost:*		*ServType:* *ServCost:*
1/22/2024	RECEIVED ORIGINAL LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.REQUESTDOC/1EXHIBIT/1	*Code:* JF *Deposit:* *Cost:*	$14.00	*ServType:* *ServCost:*
1/22/2024	ADDED DEPOSIT FROM JOHN KING OF $80.00 /SUBPOENA	*Code:* PD *Deposit:* $80.00 *Cost:*		*ServType:* *ServCost:*
1/23/2024	RECEIVED ORIGINAL MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE. **SIGNED BY JUDGE ** EXHIBIT ATTACHED (3 PAGES)MOTION/ORDEREXH - 3 PAGES	*Code:* JF *Deposit:* *Cost:*	$18.00	*ServType:* *ServCost:*
1/23/2024	LETTER TO CONTEST COURT FEES FOR JANUARY 17, 2024 FILED HEREIN BY PLTF **BUT NOT SIGNED**	*Code:* JF *Deposit:* *Cost:*	$6.00	*ServType:* *ServCost:*
1/24/2024	FAXED LETTER FILED HEREIN BY ATTY ORELIA R. LAWDINS-TRENT INFORMING THE COURT OF THE RECEIVED SERVICE OF A SUBP (ISSUED AT PLTF REQUEST) FOR CHARMAINE Y. COLSTON, AS THEY DO NOT REPRESENT MS. COLSTON IN THIS MATTER & SHE IS NOT A PARTY TO THIS PROCEEDING; SINCE OFFICE IMPROPERLY SERVED, HAS NOT FORWARDED TO MS. COLSTON; ADDITIONALLY CANNOT ASSUME ANY RESPONSIBILITY FOR HER APPEARANCE OR REQUIRE HER PRESENCE AT ANY HEARINGS IN THIS MATTER	*Code:* JF *Deposit:* *Cost:*	$6.00	*ServType:* *ServCost:*

1/25/2024	PLTF APPEARS THRU ATTY, DUSTAN ABSHIRE; DEFT APPEARS WITH ATTY, KAMIE DOMINIC; PRE-TRIAL CONFERENCE HELD; DUSTAN ABSHIRE APPEARS TODAY FOR THE LIMITED PURPOSE OF THIS EXCEPTION HEARING; ARGUMENT AND INFORMATION GIVEN; EXCEPTION REQUEST IS OVERRULED; OBJECTION TO RULING NOTED FOR THE RECORD; MATTER SET FOR TRIAL ON THURSDAY, MARCH 21, 2024 AT 9:00 AM; NOTICE GIVEN IN OPEN COURT AND TO BE MAILED. RCR	*Code:* JF *Deposit:* *Cost:* $7.00	*ServType:* *ServCost:*
2/7/2024	NOTICE OF ANSWER FILED HEREIN BY DEFENDANT RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 ISSUED TO PLTF JOHN KING, 123 N LOUISIANA AVENUE, LAKE CHARLES, LA 70601	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:* $30.00
2/7/2024	ANSWER FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; FAX: 337-426-8763; *CERTIFICATE OF SERVICE*ANSWER (2 PAGES)/1CC	*Code:* JF *Deposit:* *Cost:* $13.00	*ServType:* *ServCost:*
2/8/2024	ADDED DEPOSIT FROM KAMIE DOMINIC FOR ANSWER OF $25.00	*Code:* DD *Deposit:* $25.00 *Cost:*	*ServType:* *ServCost:*
2/23/2024	REQUEST FOR CERTIFIED COPIES RECEIVED BY CHARMAINE COLSTON. **NOTIFIED COST FOR CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00 PLUS REQ. $6.00 TOTAL AMT. REQUIRED - $29.00**	*Code:* NO *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
2/27/2024	REQUEST FOR CERTIFIED COPIES FILED HEREIN BY CHARMAINE COLSTON.	*Code:* JF *Deposit:* *Cost:* $6.00	*ServType:* *ServCost:*

Backed out this cost

2/27/2024	CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$23.00	*ServCost:*
2/27/2024	ADDED DEPOSIT FROM CREDIT CARD/CHARMAINE COLSTON FOR CERTIFIED COPIES OF $29.00	*Code:*	TPD	*ServType:*
		Deposit:	$29.00	
		Cost:		*ServCost:*
3/7/2024	TRIAL FIXED FOR THURSDAY, MARCH 21, 2024 @ 9:00 AM; 2 NOTICES MAILED.	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$8.00	*ServCost:*
3/7/2024	FAX FILED - REQUEST FOR SUBPOENA W/ATTACHED WITNESS SUBP. ACKNOWLEDGEMENT FORM FILED HEREIN BY PLTF IN PROPER PERSON. **REQUEST TO SERVE ATTY ORELIA LAWDINS-TRENT C/O HER CLIENT CHARMAINE COLSTON, LAWDINS GALLIEN FIRM, 1504 MARTIN LUTHER KING HWY STE A, LAKE CHARLES, LA 70601**FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*
		Deposit:		
		Cost:	$7.36	*ServCost:*
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*
		Deposit:		
		Cost:	$7.36	*ServCost:*

Backed out this cost

Do not give credit for this Deposit

3/11/2024	**PER JUDGE RICHARD - DISREGARD PLTFS REQUEST FOR SUBP TO BE SERVED TO ATTY ORELIA LAWDINS TRENT C/O HER CLIENT CHARMAINE Y. COLSTON - REFER TO ATTY ORELIA LAWDINS-TRENTS LETTER FILED INTO THE RECORD ON 1/24/2024 WHEREIN SHE ADVISED THE COURT SHE IS NOT THE ATTY OF RECORD FOR MS. COLSTON, AS SHE IS NOT A PARTY IN THIS MATTER**	*Code:* NO *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*	
3/19/2024	MOTION TO CONTINUE (2 PAGES); ORDER TO REFIX TRIAL FILED HEREIN BY DEFT THRU ATTY KAMIE T. DOMINIC **PLTF OPPOSES**MOTION (2 PAGES)/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $24.00	*ServType:* *ServCost:*		
3/19/2024	ADDED DEPOSIT FROM KAMIE TRAMAIN DOMINIC OF $100.00	*Code:* DD *Deposit:* $100.00 *Cost:*	*ServType:* *ServCost:*		
3/21/2024	TRIAL RE-FIXED DATE: WEDNESDAY, MAY 8, 2024 AT 9:00**NOTICE GIVEN IN OPEN COURT***	*Code:* JF *Deposit:* *Cost:* $8.00	*ServType:* *ServCost:*		
3/21/2024	PLTF APPEARS W/ATTY DUSTAN ABSHIRE; DEFT APPEARS W/ATTYS KAMIE DOMINIC & ED BAUMAN; FTR, OBJECTION TO THE MOTION TO CONTINUE BY PLTF ATTY DUSTAN ABSHIRE, REQUEST DENIED; MOTION TO CONTINUE BY DEFT ATTY KAMIE DOMINIC GRANTED & SIGNED IN OPEN COURT; TRIAL SET FOR WEDNESDAY, MAY 8, 2024 AT 9:00 AM; PLTF ATTY REQUESTS ZOOM COURT FOR MR. KING, REQUEST DENIED; NOTICE GIVEN TO ALL PARTIES IN OPEN COURT. RCR	*Code:* JF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
3/25/2024	NOTICE OF MOTION & ORDER TO CONTINUE & REFIX TRIAL ISSUED TO: (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	

4/25/2024	MOTION TO RECONSIDER DEFENDANT RENEE AMOS PEREMPTORY EXCEPTION OF PRESCRIPTION; MEMORANDUM IN SUPPORT OF MOTION TO RECONSIDER DEFT PEREMPTORY EXCEPTION (3 PAGES); EXH A (2 PAGES) FILED HEREIN BY DEFT THRU ATTY KAMIE DOMINIC.MOTION/MEMO (3 PAGES)/CC1 EXH (2 PAGES)	*Code:* JF *Deposit:* *Cost:* $25.00	*ServType:* *ServCost:*		
4/25/2024	NOTICE OF MOTION TO RECONSIDER DEFENDANTS PEREMPTORY EXCEPTION OF PRESCRIPTION ISSUED TO (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	
4/25/2024	ADDED DEPOSIT FROM CREDIT CARD/KAMIE TRAMAIN DOMINIC FOR MOTION TO RECONSIDER DEFT EXCEPTION OF $100.00	*Code:* DD *Deposit:* $100.00 *Cost:*	*ServType:* *ServCost:*		
5/8/2024	PLTF APPEARS W/ATTY JOHN CLIFFORD J. KING; DEFT APPEARS W/ATY KAMIE DOMINIC; COURT GRANTS PLAINTIFF'S ORAL MOTION TO RESET HEARING AND TO AMEND PLEADINGS TO INCLUDE HARTFORD LIFE INSURANCE COMPANY; MATTER RE-FIXED UNTIL THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; NOTICES TO BE SENT TO ALL PARTIES. RCR	*Code:* JF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
5/15/2024	TRIAL RE-FIXED FOR THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; 2 NOTICES MAILED.	*Code:* JF *Deposit:* *Cost:* $8.00	*ServType:* *ServCost:*		
5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY DUSTAN J. ABSHIRE, 334 KIRBY ST. LAKE CHARLES, LA 70601	*Code:* PC *Deposit:* *Cost:* $5.04	*ServType:* *ServCost:*		

5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	*Code:*	PC	*ServType:*	
		Deposit:			
		Cost:	$5.04	*ServCost:*	
5/20/2024	FAX FILED - PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTFFAX FILING	*Code:*	CF	*ServType:*	
		Deposit:			
		Cost:	$5.00	*ServCost:*	
5/30/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $5.00	*Code:*	PD	*ServType:*	
		Deposit:	$5.00		
		Cost:		*ServCost:*	
5/31/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTF **UP FOR REVIEW ** DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD**	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
6/4/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD. CC TO PLTF ATTY DUSTAN ABSHIRE.	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$11.00	*ServCost:*	
6/13/2024	SUPPLEMENTING PETITION (2 PAGES); ORDER; AFFIDAVIT AND COVER LETTER FILED HEREINPETITION (2 PAGES)/3CCDOCS/3	*Code:*	JF	*ServType:*	
		Deposit:			
		Cost:	$41.00	*ServCost:*	
6/13/2024	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS. **AMENDING PARAGRAPH 2 AND ADD DEFENDANT HARTFORD FIRE INSURANCE COMPANY**	*Code:*	AC	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	

6/13/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM OF $300.00 ADD DEP FOR SUPPLEMENTAL PETITION	*Code:* PD		*ServType:*	
		Deposit: $300.00			
		Cost:		*ServCost:*	
6/14/2024	CHECK REQUEST ID# 21090 FOR PREPAYMENT SERVICE FEE SUBMITTED TO COMPTROLLER	*Code:* NO		*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (RENEE AMOS THRU ATTY: KAMIE T. DOMINIC AT 1400 RYAN ST. LAKE CHARLES LA, 70601)	*Code:* CII		*ServType:*	MF3
		Deposit:			
		Cost:	$10.00	*ServCost:*	$30.00
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (HARTFORD FIRE INSURANCE COMPANY THRU: LOUISIANA SECRETARY OF STATE AT 8585 ARCHIVES AVE BATON ROUGE LA, 70809)**MAILED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE** CK. NO. 038877 ISSUED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE	*Code:* CII		*ServType:*	SF
		Deposit:			
		Cost:	$10.00	*ServCost:*	$40.40
6/17/2024	PREPAYMENT OF SERVICE FEE. CHECK #038725 PAID TO: SECRETARY OF STATES OFFICE	*Code:* SF		*ServType:*	
		Deposit:			
		Cost:	$50.00	*ServCost:*	
6/18/2024	MOTION AND ORDER TO WITHDRAW DUSTAN J. ABSHIRE AS COUNSEL OF RECORD FOR PLTF, JOHN CLIFFORD J KING; ORDER SIGNED BY JUDGE RONALD C. RICHARD ON 6/20/2024; COPY OF LETTER W/EMAIL FILED HEREIN BY ATTY DUSTAN J. ABSHIRE. CERT OF SERVICE. COVER LETTER FILED. COPY TO ATTY ABSHIRE. COPY TO PLTF.CVR LTR/MOTION/ORDER/COPY2 EXH	*Code:* JF		*ServType:*	
		Deposit:			
		Cost:	$25.00	*ServCost:*	

6/20/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM, LLC OF $25.00 ADD DEP MOTION& ORDER TO WITHDRAW AS COUNSEL OF RECORD	*Code:* PD *Deposit:* $25.00 *Cost:*		*ServType:* *ServCost:*
6/21/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO PLTF, JOHN CLIFFORD J KING @ 123 N LOUISIANA AVE, LAKE CHARLES, LA 70601	*Code:* NO *Deposit:* *Cost:*	$0.00	*ServType:* *ServCost:*
6/24/2024	COPY OF PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.**THE ORIGINAL THAT WAS FILED 5/31/2024 ATTACHED TO THIS COPY FOR JUDGE RICHARDS REVIEW** DENIED DUE TO NO 3RD PARTY AFFIANT PROVIDED**	*Code:* JF *Deposit:* *Cost:*	$0.00	*ServType:* *ServCost:*
6/27/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF HAS FAILED TO PROVIDE A THIRD PARTY AFFIANT. CC TO PLTF.ORDER/CC	*Code:* JF *Deposit:* *Cost:*	$11.00	*ServType:* *ServCost:*
7/3/2024	ANSWER FILED HEREIN BY DEFENDANT, HARTFORD FIRE INSURANCE COMPANY, THRU ATTY KAMIE T. DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; CERTIFICATE OF SERVICEANSWER (2 PAGES)	*Code:* JF *Deposit:* *Cost:*	$8.00	*ServType:* *ServCost:*
7/3/2024	ADDED DEPOSIT FROM KAMIE DOMINIC OF $25.00 ADD DEP FOR ANSWER	*Code:* DD *Deposit:* $25.00 *Cost:*		*ServType:* *ServCost:*
7/3/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $10.00	*Code:* PD *Deposit:* $10.00 *Cost:*		*ServType:* *ServCost:*

7/9/2024	SPOKE TO DEFT ATTY KAMIE DOMINIC AND SHE CONFIRMED SHE EMAIL THE ANSWER TO JOHN KING; THEREFORE, IT DID NOT NEED TO BE SERVED	*Code:*	NO	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
7/25/2024	AMENDING & SUPPLEMENTAL MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY DUSTAN J ABSHIRE & SIGNED BY JUDGE RONALD C. RICHARD ON 7/29/2024. CERT OF SERVICE. COVER LETTER FILED. CONF COPY TO ATTY ABSHIRE.CVR LTR/ORDER/COPY**CC MAILED TO PLTF; CC MAILED TO DEFT ATTY**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$15.00	*ServCost:*
7/25/2024	ADDED DEPOSIT FROM DUSTIN J. ABSHIRE OF $15.00 ADD DEP/ MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD	*Code:*	PD	*ServType:*
		Deposit:	$15.00	
		Cost:		*ServCost:*
7/30/2024	FAX FILED -PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*
8/2/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON ** UP FOR JUDGE REVIEW**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
8/13/2024	ORDER FOR PAUPER AFFIDAVIT SIGNED BY JUDGE RONALD C. RICHARD ON 8/13/2024 ** FROM THIS DATE PLTF WILL BE ALLOWED TO PROCEED IN PAUPER STATUS** NOTIFIED PLTF	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
10/31/2024	FAX FILED - MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	*Code:*	CF	*ServType:*
		Deposit:		
		Cost:	$5.00	*ServCost:*

10/31/2024	MOTION IN LIMINE TO EXCLUDE HEARSAY WITNESSES AND EVIDENCE (2 PAGES); ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION (2PGS)/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $24.00	*ServType:* *ServCost:*		
10/31/2024	MOTION TO STRIKE & MOTION FOR SANCTIONS; ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION/ORDER/2CC	*Code:* JF *Deposit:* *Cost:* $22.00	*ServType:* *ServCost:*		
10/31/2024	ANSWER TO AMENDED PETITION FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE T DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059ANSWER/1CC	*Code:* JF *Deposit:* *Cost:* $11.00	*ServType:* *ServCost:*		
10/31/2024	NOTICE OF ANSWER TO AMENDED PETITION ISSUED TO (KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601)	*Code:* JF *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	
10/31/2024	ADDED DEPOSIT FROM RENEE E OR PATRICK S AMOS OF $350.00 ADD DEP FOR AMENDED ANSWER. MOTION IN LIMINE & MOTION TO STRIKE	*Code:* DD *Deposit:* $350.00 *Cost:*	*ServType:* *ServCost:*		
11/1/2024	FAX FILED - DEFENDANTS OPPOSITION TO PLAINTIFFS MOTION TO CONTINUE & MOTION TO QUASH (3 PAGES); ORDER FAX FILED HEREIN BY DEFTS THRU ATTY KAMIE DOMINIC. CERT OF SERVICE. COVER LETTER.FAX FILING	*Code:* CF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*		
11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION IN LIMINE	*Code:* CIO *Deposit:* *Cost:* $10.00	*ServType:* MF3 *ServCost:*	$30.00	

11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION TO STRIKE & FOR SANCTIONS	*Code:* CIO	*ServType:* MF3		
		Deposit:			
		Cost: $10.00	*ServCost:* $30.00		
11/7/2024	FAX FILED - PLTFS MOTION TO RECONSIDER, MOTIONS TO INTERVENE LACK OF DUE PROCESS, MOTIONS TO DISMISS QUASH; ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	FAX FILED VIA EMAIL - MOTION TO STRIKE AND SEAL CERTAIN LANGUAGE FROM THE RECORD (2PAGES); ORDER; AFFIDAVIT FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	FAX FILED VIA EMAIL - NOTICE OF SUBP TO DEFT ATTY KAMIE T. DOMINIC FILED HEREIN BY PLTF.FAX FILING	*Code:* CF	*ServType:*		
		Deposit:			
		Cost: $5.00	*ServCost:*		
11/7/2024	JUDGE RICHARD CALLED FOR AN INSTANT STATUS HEARING - PLTF APPEARS THRU ATTY OLIVER SCHRUMPF; DEFT APPEARS THRU ATTY KAMIE DOMINIC; 2-WIT SWORN; MOTION TO ENROLL AS COUNSEL OF RECORD FOR PLTF GRANTED & SIGNED; JUDGE RICHARD READ INTO THE RECORD ALL EMAIL PLEADINGS FROM PLTF & HIS SPOUSE RECEIVED 10/31/24 TO 11/7/2024; PLTFS MOTION TO CONTINUE TRIAL DENIED; COURT INFORMS DEFT ATTY THAT HER 10/31/24 MOTIONS FILED WOULD BE DENIED DUE TO UNTIMELINESS; COUNSEL K. DOMINIC WITHDRAWS MOTIONS & O. SCHRUMPF RENDERED HIS OPPOSITIONS MOOT; COURT ORDERED A REPORT BY DOCTOR CONFIRMING PLTF CANNOT TRAVEL. UPON RECEIPT JUDGE RICHARD WILL GRANT PLTF REQUEST TO APPEAR VIA ZOOM; MRS. KING & COUNSEL MUST APPEAR LIVE. (DR. REPORT DUE BY MONDAY, 11/11/2024). RCR	*Code:* JF	*ServType:*		
		Deposit:			
		Cost: $9.00	*ServCost:*		

11/7/2024	MOTION TO ENROLL AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY OLIVER JACKSON SCHRUMPF & SIGNED BY JUDGE RONALD C. RICHARD 11/7/2024. CERT OF SERVICE. CONF COPY TO PLTF ATTY.MOTION/CONF COPY	*Code:* JF *Deposit:* *Cost:* $9.00	*ServType:* *ServCost:*
11/7/2024	MOTION & ORDER TO CONTINUE NOV. 14, 2024 TRIAL FILED HEREIN BY PLTF THRU ATTY ***DENIED BY JUDGE RONALD C. RICHARD***	*Code:* JF *Deposit:* *Cost:* $6.00	*ServType:* *ServCost:*
11/8/2024	RECEIVED ORIGINAL MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. ATTACHED EXHIBITS (8 PAGES)MOTION (4 PAGES)/ORDER2 DOCSEXHIBITS (8 PAGES)	*Code:* JF *Deposit:* *Cost:* $46.00	*ServType:* *ServCost:*
11/12/2024	PRE-TRIAL BRIEF (4 PAGES) FILED VIA EMAIL BY PLTF THRU ATTY OLIVER SCHRUMPF.	*Code:* CF *Deposit:* *Cost:* $5.00	*ServType:* *ServCost:*
11/14/2024	PLTF APPEARS W/ATTY OLIVER SCHRUMPF; DEFT APPEARS W/ATTY KAMIE DOMINIC; 5 WITS SWORN; 10 DOCS INTRO (34 PAGES); PLAINTIFF FAILED TO PROVE BY PREPONDERANCE OF EVIDENCE THAT AMOS DID ANYTHING INCORRECT IN PROCESSING THIS MATTER, MS. COLSTON'S TESTIMONY COULD HAVE SWAYED THE COURT BUT PLAINTIFF FAILED TO SUBPOENA HER; COSTS AWARDED TO PLAINTIFF; FORMAL JUDGMENT TO BE SIGNED UPON PRESENTATION; HEARING ON MOTION FOR CONTEMPT; COURT HOLDS JOHN KING IN DIRECT CONTEMPT OF COURT AND FINED $500.00. RCR	*Code:* JF *Deposit:* *Cost:* $85.00	*ServType:* *ServCost:*
11/14/2024	CONTEMPT OF COURT FINE ASSESSED TO PLTF, JOHN CLIFFORD KING IN THE AMOUNT OF $500.00	*Code:* CF *Deposit:* *Cost:* $500.00	*ServType:* *ServCost:*

ORig to 10/31/24 Fax Filing

11/15/2024	RULE TO SHOW CAUSE ORDER FOR SHUNTE KING TO APPEAR & SHOW CAUSE WHY SHE SHOULD NOT BE HELD IN CONTEMPT OF COURT, PURSUANT TO LSA - CCP ART 222 FILED HEREIN & SIGNED BY JUDGE RONALD C. RICHARD**RULE WILL BE SET UPON SERVICE INSTRUCTIONS OBTAINED**	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
11/15/2024	EMAIL REQUEST FOR ESTIMATED COST OF TRIAL TRANSCRIPT BY PLTF ATTY OLIVER SCHRUMPF ** TESTIMONY APPROXIMATELY 2 HOURS / REGULAR (WITHIN 30 DAYS) 150 PAGES X $4.75/PAGE = $712.50 / RUSH (WITHIN 10 DAYS) 150 PAGES X $5.50/PAGE = $825.00** PROVIDED TO MR. SCHRUMPF VIA EMAIL	*Code:*	NO	*ServType:*
		Deposit:		
		Cost:	$0.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - PLTFS MOTION TO RECONSIDER, MOTIONS TO INTERVENE LACK OF DUE PROCESS, MOTIONS TO DISMISS QUASH; ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF.DOCS/6	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$36.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - MOTION TO STRIKE AND SEAL CERTAIN LANGUAGE FROM THE RECORD (2PAGES); ORDER; AFFIDAVIT FILED HEREIN BY PLTF.DOCS/3EXH (14 PAGES)	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$46.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL EXHIBIT 1FILED HEREIN BY PLTF.EXH 15 PAGES	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$30.00	*ServCost:*
11/18/2024	RECEIVED ORIGINAL - NOTICE OF SUBP TO DEFT ATTY KAMIE T. DOMINIC FILED HEREIN BY PLTF.	*Code:*	JF	*ServType:*
		Deposit:		
		Cost:	$6.00	*ServCost:*
11/19/2024	RULE: TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KINGDATE: WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM	*Code:*	RU	*ServType:*
		Deposit:		
		Cost:	$4.00	*ServCost:*

Orig. to 11-7-2024 Fax Filing

Orig. to 11-7-2024 Fax Filing

Orig. to 11-7-2024 Fax Filing

11/19/2024	CITATION ORDER ISSUED (SHUNTE KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601 OR 1648 PAVILLION DR., IOWA, LA 70647)CONTEMPT OF COURTSENT TO CALCASIEU PARISH SHERIFF	*Code:* CIO *Deposit:* *Cost:* $10.00	*ServType:* *ServCost:*
11/19/2024	HEARING NOTICE FOR RULE TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KING SET FOR WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM MAILED TO ATTORNEY OLIVER JACKSON SCHRUMPF	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/19/2024	HEARING NOTICE FOR RULE TO SHOW CAUSE FOR CONTEMPT AGA SHUNTE KING SET FOR WEDNESDAY, JANUARY 22, 2025 @ 9:00 AM MAILED TO ATTORNEY KAMIE T. DOMINIC	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/20/2024	LETTER REQUEST FOR COPY OF TRIAL TRANSCRIPT (REGULAR - WITHIN 30 DAYS) FILED HEREIN BY PLTF THRU ATTY OLIVER SCHRUMPF.	*Code:* JF *Deposit:* *Cost:* $0.00	*ServType:* *ServCost:*
11/20/2024	ADDED DEPOSIT FROM CK/SCHRUMPF LAW OFFICE FOR TRIAL TRANSCRIPT OF $712.50 Deposit goes toward Transcript	*Code:* PD *Deposit:* $712.50 *Cost:*	*ServType:* *ServCost:*
11/21/2024	JUDGMENT READ & SIGNED BY JUDGE RONALD C. RICHARD **IN FAVOR OF DEFT, RENEE AMOS & AGA PLTF, JOHN CLIFFORD J KING, DISMISSING WITH PREJUDICE, ALL COSTS ASSESSED TO PLTF, JOHN CLIFFORD J KING** CC TO PLTF ATTY SCHRUMPF; CC TO DEFT ATTY DOMINIC.ORDER/2CC	*Code:* JU *Deposit:* *Cost:* $16.00	*ServType:* *ServCost:*
11/21/2024	NOTICE OF JUDGMENT MAILED TO (JOHN CLIFFORD J KING THRU ATTY OLIVER JACKSON SCHRUMPF @ 3801 MAPLEWOOD DR., SULPHUR, LA 70663)	*Code:* NJ *Deposit:* *Cost:* $10.00	*ServType:* *ServCost:*

11/21/2024	NOTICE OF JUDGMENT MAILED TO (RENEE AMOS THRU ATTY KAMIE T. DOMINIC @ 1400 RYAN ST., LAKE CHARLES, LA 70601)	*Code:*	NJ	*ServType:*	
		Deposit:			
		Cost:	$10.00	*ServCost:*	
11/21/2024	CLERK CERTIFICATE CERTIFYING NOTICE OF JUDGMENT MAILED TO PLTF THRU ATTY OLIVER JACKSON SCHRUMPF AND TO DEFT, RENEE AMOS THRU ATTY KAMIE T. DOMINIC. COPY TO PLTF ATTY; COPY TO DEFT ATTY.	*Code:*	NO	*ServType:*	
		Deposit:			
		Cost:	$0.00	*ServCost:*	


The Judiciary Commission of Louisiana
Office of Special Counsel
NEW ORLEANS LA
PERSONAL AND CONFIDENTIAL


The Judiciary Commission of Louisiana
Office of Special Counsel
NEW ORLEANS LA
PERSONAL AND CONFIDENTIAL


The Judiciary Commission of Louisiana
Office of Special Counsel
NEW ORLEANS LA
PERSONAL AND CONFIDENTIAL

Re: Case # 24-118583 more crimes reported

From: True King <truekingfile@gmail.com>

To: Meagan Smith <msmith@cpdao.org>

Cc: David Guidry <dguidry@cpdao.org>

Date: Fri, 14 Feb 2025 14:15:30 -0500

Attachments:
image003.jpg
image002.jpg

Hello,
There need to be more incidents and claims added as I have not been in the state and I found out today an insurance claim was also filed 04/2021 for collision payout for a wreck I wasn't involved in and on a policy I filed no claim against and this is affecting additional insurance rates and driving record.

Mutual funds
Cars being stolen
SBA fees and lending
Life insurance cash values and total policies transferred with agents testifying I walked in the office but proof i wasn't in the state
- the court of appeals has also agreed I was not in the state and could not have committed these crimes or the many other documents that are being forged mailed and signed out.

This is impersonation and it's on the trial transcript from court.

How much of this do i have to accept be you guys put a stop to it?
On Thu, Feb 13, 2025 at 5:41 PM True King <truekingfile@gmail.com> wrote:

> Calling now
>
> On Thu, Feb 13, 2025 at 10:38 AM Meagan Smith <msmith@cpdao.org> wrote:
>
>> I just tried to call you again and left you a voicemail. Please call us
>> when you can.
>>
>>
>>
>> Thanks,
>>
>>
>>
>>
>>
>> *Meagan Smith *
>>
>> *Felony Trial Assistant to ADA David Guidry*| Felony Division F

>>
>> Calcasieu Parish District Attorney’s Office
>>
>> 901 Lakeshore Dr. Lake Charles, LA 70601
>> <https://www.google.com/maps/search/901+Lakeshore+Dr.+Lake+Charles,+LA+70601?entry=gmail&source=g>
>>
>> Direct Line: (337) 437-3281 | Email: msmith@cpdao.org
>>
>>
>>
>> *From:* True King <truekingfile@gmail.com>
>>
>> *Sent:* Thursday, February 13, 2025 9:34 AM
>> *To:* Meagan Smith <msmith@cpdao.org>
>> *Cc:* David Guidry <dguidry@cpdao.org>
>> *Subject:* Re: Case # 24-118583
>>
>>
>>
>> Phone number is working fine.
>>
>> (318) 995-1705
>>
>>
>>
>> I have put in case requests with the Parish in December. Megan you
>> mentioned updating multiple times and never sent an email.
>>
>> I’ve emailed 4 times in a row since then no response this has been almost
>> 100 days and you’ve never asked for witness testimony or told me what’s
>> being done to stop the impersonation that is on the record and confirmed by
>> a judge.
>>
>>
>>
>> Could you please tell me if you’ve been given any recent evidence and
>> last day you received evidence? Something has to be done about this.
>>
>> On Thu, Feb 13, 2025 at 10:24 AM Meagan Smith <msmith@cpdao.org> wrote:
>>
>> Mr. King,
>>
>>
>>
>> We tried to contact you this morning, but the phone number was not

>> working. Can you please verify the number? Or give us a call.
>>
>>
>>
>>
>>
>> *Meagan Smith *
>>
>> *Felony Trial Assistant to ADA David Guidry*| Felony Division F
>>
>> Calcasieu Parish District Attorney’s Office
>>
>> 901 Lakeshore Dr. Lake Charles, LA 70601
>> <https://www.google.com/maps/search/901+Lakeshore+Dr.+Lake+Charles,+LA+70601?entry=gmail&source=g>
>>
>> Direct Line: (337) 437-3281 | Email: msmith@cpdao.org
>>
>>
>>
>> *From:* True King <truekingfile@gmail.com>
>> *Sent:* Wednesday, February 12, 2025 5:52 PM
>> *To:* David Guidry <dguidry@cpdao.org>; Meagan Smith <msmith@cpdao.org>
>> *Subject:* Re: Case # 24-118583
>>
>>
>>
>> Hello Many months I have inquired about this case and I have two new
>> cases of impersonation and it is now affecting my drivers license. I have
>> not been contacted and would like to appeal this to a higher authority as
>> it appears my case and crimes against me are continuing. My safety and
>> safety of those around me continues to be threatened and I have forged
>> expenses and loans that need to be addressed. I have witnesses, I have
>> evidence please provide a response or advise who to seek relief from at
>> Attorney General or US Department of Justice.
>>
>>
>>
>> This case is not being handled despite all of the evidence supporting the
>> crime.
>>
>> May I have a status update?
>>
>> Is there some other reason why Im being denied justice?
>>
>> Please advise?

>>
>>
>>
>> On Mon, Dec 9, 2024 at 6:44 PM True King <truekingfile@gmail.com> wrote:
>>
>> Mr Guidry
>>
>>
>>
>> Please contact me concerning a series of repeated impersonation illegal
>> activities that are continuing as there is a third party who is being used
>> to represent me to do a number of financial crimes etc additionally i have
>> never been married before my current wife but there appears to be some
>> discussion saying I was married while I was once again not in the state and
>> the person was under a restraining order.
>>
>>
>>
>> I have signed and notarized none of the documents that are circulating to
>> perpetuate my identity, harass my home and continue to attempt to set me up
>> for crimes and the person accused has become more embolden and I have been
>> suffering for many years this financial abuse and harassment stalking and
>> attempting to by force force me into marriages and representing herself as
>> my wife and saying my parents are legally her in laws and I have provided
>> affidavit of non marriage to prove I’ve never been married.
>>
>>
>>
>> I have reported several incidents please contact me regarding the matter
>> as the bulk of the evidence you have not even seen please and thank you .
>>
>> John C King
>>
>> 3189951934
>>
>>





Wednesday, July 12, 2023

CITY COURT
City of Lake Charles, Louisiana

P.O. Box 1664
Lake Charles, Louisiana 70602
(337) 491-1564

Hearing NOTICE

Defendant **COLSTON, CHARMAIN**

ATTN: DERRICK KEE
723 BROAD STREET
LAKE CHARLES, LA 70601

JOHN KING

VS SuitNo: **23-1206**
CHARMAIN COLSTON

Please be advised that the above numbered and entitled cause has been fixed for **Hearing** at **9:00 AM** on **Wednesday, August 16, 2023**, in the City Court Building located at **118 West Mill Street, Lake Charles, La.**

Should you need witnesses, please furnish us with the name and addresses at least 1 (one week in advance of the trial date. We require advance deposit to cover service and witness fees

If you have any type of audio/visual presentation, please contact our office at (337) 491-1564 to set up or got to www.lccitycourt.org for instructions.

Deputy Clerk

11.8.2024
Good Morning Mr Schrumpf,

Attached are links to the “guilty party” who created the documentation Judge Redd claims is the practice of law. Im pretty sure they would need to be served at a California address. This is 100% the guilty party as every word in the submitted motions is exactly as the evidence reflects was submitted to the clerks office.

Link #1 https://chatgpt.com/share/672df309-c7d4-8004-8d27-f00bdc0ca49a

Link # 2 https://chatgpt.com/share/672dfa04-b218-8004-81ac-2957ee97498a



Chat AI





Can you show me terms and conditions of the Hartford surety bond

I'm unable to access real-time information or specific documents from The Hartford or other external source, including their surety bond terms and conditions. For detailed information about The Hartford's surety bond terms and conditions, I recommend visiting their official website or contacting them directly.

Alternatively, if you have a specific surety bond from The Hartford and are looking for information within the bond agreement, I recommend reviewing the document itself or contacting The Hartford's customer service or legal team for assistance.

Can you show me terms and conditions of the Hartford surety bond for notaries

Chat AI

This is a conversation in between human and Chat AI. AI is friendly, smart and very helpful.

Can you help me find cases about Louisiana notary fraud

I can't browse the internet to find real-time information or specific legal cases. However, I can suggest general information about Louisiana notary fraud or guide you on where to look for such cases. Would you like me to provide some general information on the topic?

Can you tell me about cases involving Louisiana notary fraud peremptory exceptions

Peremptory exceptions in Louisiana are essentially summary judgment motions that allow a party to seek the dismissal of a case without a trial based on certain

Chat AI

How to prove discovery exceptions statute of limitations Louisiana

In Louisiana, to prove an exception based on the statute of limitations for discovery, you typically need to show that the cause of action was not reasonably discoverable by the plaintiff until a certain point in time. This often involves demonstrating that the plaintiff could not have known about the injury or cause of action through reasonable diligence.

Here are some steps to consider when proving the discovery exception statute of limitations in Louisiana:

1. Understand the Law: Familiarize yourself with the specific statute of limitations laws in Louisiana related to the type of case you are dealing with. Different types of legal actions have different statutes of limitations.

2. Gather Evidence: Collect all relevant evidence that supports your claim that the cause of action was not discoverable

discovery.

3. Build a Timeline: Create a timeline of events showing when the injury or cause of action was discovered or should have been discovered through reasonable diligence. This timeline can be crucial in demonstrating that the discovery exception applies.

4. Consult with an Attorney: Legal matters involving statutes of limitations can be complex, so it's advisable to consult with a qualified attorney who is experienced in Louisiana law. They can provide guidance on the specific requirements for proving the discovery exception and help you navigate the legal process.

5. File a Motion: If you believe that the discovery exception applies in your case, you may need to file a motion with the court to assert this defense. Your attorney can help you prepare and submit the necessary documentation to support your argument.

Remember that the specific steps and requirements for proving the discovery

justice in such complex legal matters.

What are some common challenges legal professionals face when negotiating with opposing parties in cases of notarial misconduct or negligence?

Legal professionals may encounter several challenges when negotiating with opposing parties in cases involving notarial misconduct or negligence. Some common challenges include:

1. Denial of Liability: The opposing party may deny any wrongdoing or may refuse to acknowledge the notarial misconduct or negligence, making negotiations challenging.

2. Lack of Cooperation: The opposing party may be uncooperative, making it difficult to gather information, reach agreements, or move forward with negotiations.

negotiations.

4. Emotional Factors: Emotions can run high in legal disputes, especially when allegations of misconduct or negligence are involved. Emotions can hinder rational decision-making and impede successful negotiations.

5. Power Imbalance: Power dynamics between the parties can affect negotiations. If one party has more resources, influence, or leverage, it can create an imbalance that makes negotiations challenging for legal professionals.

6. Multiple Parties: In some cases, there may be multiple parties involved, each with different interests and perspectives. Coordinating negotiations and reaching agreements with multiple parties can be complex.

7. Limited Communication: Communication breakdowns or lack of effective communication between the parties can hinder negotiations and make it challenging to find common ground or reach a settlement.

that:

- The email is what it claims to be
- The email was sent or received by the person claimed to have sent or received it
- The email is relevant to the case

- **Format**: The records must be in a court-admissible format.
- **Preservation**: Email evidence can be accidentally deleted or its authenticity questioned.
- **Requesting evidence**: Litigants can request email evidence through a Request for Production or written Interrogatories.
- **Authenticating evidence**: A single email can be validated by confirming it with other email sources.
- **Spoliation**: The destruction of emails and other electronic data is punishable by the

4:37

marylandinjurylawcenter.com

Free Case Evaluation: **800-553-8082**

TAP TO CALL TAP TO TEXT

one. How do you get the emails authenticated? Defendant claimed that the prosecution did not do what it had to do to allow the jury to consider, and convict in this case, the emails.

There are many paths to authenticate e-mails. It can be as easy as getting the witness who received the email to testify that the printed email was received. Emails also usually show the source so authentication can be done just like U.S. Mail can be authenticated. There is also the business record exception. So, on its face, this is not a big deal.

But the problem is emails are so easy to fake,

4:40

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TAP TO CALL TAP TO TEXT

as a condition precedent to admissibility is satisfied by evidence sufficient to support a finding that the matter in question is what its proponent claims." Ultimately, authentication serves the purpose of "requiring the presentation of evidence sufficient to show that the evidence sought to be admitted is genuine."

Hearsay Problem

In addition, emails may be subject to the hearsay rule, which generally prohibits the admission of out-of-court statements made by someone other than the witness who is testifying, unless an exception to the rule applies. One such exception is the business

4:44

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TAP TO CALL TAP TO TEXT

mail" (i.e. do they contain information that only the alleged sender would possess?), the use of names or nicknames, and any other identifying factors that could link an e-mail address to a certain person as to its sender or author.

The piece of circumstantial evidence that doomed Defendant and authenticated the e-mails as being written by him was the paper found in his house with the various email addresses recorded on it, some of which were used to communicate lies to the police and threats to the bar owner.

When coupled with the fact that the e-mails all covered the same subject, were written in the same tone, written during the same time

4:45

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Free Case Evaluation: **800-553-8082**

TAP TO CALL TAP TO TEXT

Mr. Donati.

Combined with the direct evidence provided by the police officers as to the authenticity of their half of the electronic communications, the court found sufficient grounds to uphold the authentication of the e-mails by the trial court.

How to Present Email Evidence in Court Though a Witness

Here is an example of a lawyer admitting an email through a witness by laying a proper foundation:

Lawyer: Ms. Doe, I would like to direct your

4:46

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Free Case Evaluation: **800-553-8082**

TAP TO CALL TAP TO TEXT

- The Federal Rule of Evidence 901 provides the standard for the authentication of evidence, including emails. Rule 901(a) requires that the proponent of the evidence must present sufficient evidence to support a finding that the item is what the proponent claims it is.
- The court reiterated the 5 step approach set forth by the U.S. Supreme Court in **Neil v. Biggers** 409 U.S. 188, 189 (1972) for determining the reliability of in-court voice identification: (1) the ability of the witness to hear the assailant speak, (2) the witness's degree of attention, (3) the accuracy of any prior identifications the witness made, (4) the period of time

Additionally evidence of the paid paralegals who assisted in past editing and review.

You will also find attached undisclosed evidence of exparte unethical communications that have been alleged against Ms Lawdins- Trent and LaKoshia Roberts. This is the root of the lies and Judge Richard has been played by them.

Please advise best ways to proceed in serving the “villian” who created the motions that Judge Richard alleges false allegations against Shunte King simply because technology has outpaced the speed of law.

There are also subscriptions to two other legal document preparation apps which are permissible for Pro Se use.

Notice of Correction of False Addresses and Appellate Misrepresentations

Plaintiff submits this Notice to correct multiple inaccuracies and fabricated statements that appear in the record. Plaintiff has never lived in or provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and all fees assessed for service at that location were created without factual basis and must be removed immediately.

Additionally statements made by attorney Mr Bauman regarding the location of a homicide are false. The incident referenced in the appellate filings occurred in Houston Texas not Iowa Louisiana. The claim that Plaintiff spouse called helicopters is also false and unsupported. These misrepresentations distorted the appellate record and contributed to inflated court costs and retaliatory actions taken by the Court.

Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

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Additionally statements made by attorney Mr Bauman regarding the location of a homicide are false. The incident referenced in the appellate filings occurred in Houston Texas not Iowa Louisiana. The claim that Plaintiff spouse called helicopters is also false and unsupported. These misrepresentations distorted the appellate record and contributed to inflated court costs and retaliatory actions taken by the Court.

Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

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Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

Tuesday, November 19, 2024

CITY COURT
City of Lake Charles, Louisiana

P.O. Box 1664
Lake Charles, Louisiana 70602
(337) 491-1564

Hearing NOTICE

Plaintiff **KING, JOHN CLIFFORD J**

ATTN: OLIVER JACKSON SCHRUMPF
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

JOHN CLIFFORD J KING

VS SuitNo: **23-2124**

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Contempt of Court on Shunte King

Please be advised that the above numbered and entitled cause has been fixed for **Hearing** at **9:00 AM** on **Wednesday, January 22, 2025**, in the City Court Building located at **118 West Mill Street, Lake Charles, La.**

Should you need witnesses, please furnish us with the name and addresses at least 1 (one week in advance of the trial date. We require advance deposit to cover service and witness fees

If you have any type of audio/visual presentation, please contact our office at (337) 491-1564 to set up or got to www.lccitycourt.org for instructions.

Clerk

RECD LC CITY COURT CIV
'24 NOV 15 PM 3:38

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS. NO. 23-2124	:	WARD 3, CALCASIEU PARISH
RENEE AMOS NOTARY PUBLIC ID# 29374	:	STATE OF LOUISIANA
FILED: 11-15-2024	:	M Clerk ~~DEPUTY~~ CLERK OF COURT

RULE TO SHOW CAUSE

SHUNTE KING (a non-party in the referenced matter) is hereby ordered to appear on the 22nd day of January, 2025 at 9:00 o'clock A.m., to show cause why she should not be held in contempt of court, pursuant to LSA – C.C.P. Art. 222, based on the following:

1. Willful disobedience of any lawful judgment, order, mandate, writ, or process of court (La C.C.P. Art. 224(2)); specifically, Shunte King willfully interrupted the course of the November 14, 2024 hearing on a contempt of court charge lodged against her husband, plaintiff John Clifford J King. Shunte King willfully and knowingly and unlawfully called 911 in an effort to remove her husband, John Clifford J King from the courtroom while under direct examination by Judge Ronald C. Richard. Shunte King intentionally and willfully disrupted and interfered with court proceedings.

SIGNED this 15th day of November, 2024.

RONALD C. RICHARD
JUDGE, DIVISION B

A TRUE COPY
Date: 11-19-2024
Clerk

Re: Contempt

From: True King <truekingfile@gmail.com>

To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

Date: Fri, 22 Nov 2024 12:44:02 -0500

Mr Schrumpf they keep increasing my cost unjustly. It's $55 per service and they just served my wife KNOWING service at your office was moot, I don't know where they even got an IOWA address, she doesn't live in lake charles and they were informed by her attorney and her that she is not a Nj resident and her address cannot appear on record.

They're changing receipt dates when tracking number says my mail was received many days before what they're putting on record:
- they're charging me for the device on the untimely motion filed by Kamie on Oct 31 and for the service that the judge signed and then threw out that's another $55
- they're charging me for email filings
When courts phones and fax lines were down nov 1- Nov 4 and I overnighted copies with tracking so
They're doubling my filing fees.

It was $2000 I had $1000 credit on record and you sent over $800. They wasted flight money and made me pay two hours of them accusing my wife of practicing law only to
Discover Chat GPT created the documents and they had real
Time receipts.
- he's charging my wife with contempt a full week after the hearing after finding out I filed impersonation charges with CPSO against charmaine colston so in retaliation he's doing more contempt charges and everytime we call or email attaching more charges saying we're not allowed to contact about the case.

I understand Renee Amos is his friend but this is so boldly unbalanced I cannot pay off fees they're intentionally adding more daily and creating fees out of thin air.
Please isn't there a way to suspend paying the fees as I am
A pauper in the interest of justice as this shouldn't prevent someone from Appealing and contempt fees and services are not apart of this case and should not go up with the case correct ?

On Fri, Nov 22, 2024 at 12:31 PM Oliver Schrumpf <oschrumpf@schrumpf-law.com> wrote:

> I am okay with the proposal to pay $1000.00 next week (Tuesday) and
> $1000.00 the week after (Friday).
>
>

>
> We will file the Motion and Order for Devolutive appeal on Monday,
> November 25.
>
>
>
> Cost will need to be paid As required by La. C.C.P. Art. 2126. Payment
> of costs
>
> A. The clerk of the trial court, immediately after the order of appeal
> has been granted, shall estimate the cost of the preparation of the record
> on appeal, including the fee of the court reporter for preparing the
> transcript and the filing fee required by the appellate court. The clerk
> shall send notices of the estimated costs by certified mail to the
> appellant and by first class mail to the appellee.
>
> B. Within twenty days of the mailing of notice, the appellant shall pay
> the amount of the estimated costs to the clerk. The trial court may grant
> one extension of the period for paying the amount of the estimated costs
> for not more than an additional twenty days upon written motion showing
> good cause for the extension.
>
> C. The appellant may question the excessiveness of the estimated costs by
> filing a written application for reduction in the trial court within the
> first twenty-day time limit, and the trial court may order reduction of the
> estimate upon proper showing. If an application for reduction has been
> timely filed, the appellant shall have twenty days to pay the costs
> beginning from the date of the action by the trial court on application for
> reduction.
>
> D. After the preparation of the record on appeal has been completed, the
> clerk of the trial court shall, as the situation may require, either refund
> to the appellant the difference between the estimated costs and the actual
> costs if the estimated costs exceed the actual costs, or send a notice by
> certified mail to the appellant of the amount of additional costs due, if
> the actual costs exceed the estimated costs. If the payment of additional
> costs is required, the appellant shall pay the amount of additional costs
> within twenty days of the mailing of the notice.
>
> E. If the appellant fails to pay the estimated costs, or the difference
> between the estimated costs and the actual costs, within the time
> specified, the trial judge, on his own motion or upon motion by the clerk
> or by any party, and after a hearing, shall:
>
> (1) Enter a formal order of dismissal on the grounds of abandonment; or
>

> (2) Grant a ten day period within which costs must be paid in full, in
> default of which the appeal is dismissed as abandoned.
>
> F. If the appellant pays the costs required by this Article, the appeal
> may not be dismissed because of the passage of the return day without an
> extension being obtained or because of an untimely lodging of the record on
> appeal.
>
> Amended by Acts 1976, No. 708, §2; Acts 1977, No. 198, §2, eff. Jan. 1,
> 1978; Acts 1978, No. 449, §1, eff. Jan. 1, 1979; Acts 1984, No. 937, §1;
> Acts 1995, No. 105, §1.
>
>
>
> Oliver “Jackson” Schrumpf
>
> Schrumpf Law Office (PLC)
>
> 3801 Maplewood Drive
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA%C2%A0+70
663?entry=gmail&source=g>
>
> Sulphur, LA 70663
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA%C2%A0+70
663?entry=gmail&source=g>
>
> Phone: 337-625-9077
>
> Fax: 337-625-8231
>
> oschrumpf@schrumpf-law.com
>
>
>
>
>
>
>
>
>
>
> *From:* True King <truekingfile@gmail.com>
> *Sent:* Friday, November 22, 2024 11:17 AM
> *To:* Jinnifer LeBlanc <Jleblanc@schrumpf-law.com>; Oliver Schrumpf <
> oschrumpf@schrumpf-law.com>
> *Subject:* Re: Contempt
>

>
>
> Ms Jinnifer,
>
> Thank you
>
> Please advise Mr Schrumpf I will be moving forward with the appeal on the
> small claims case.
>
>
>
> Please ask Mr Schrumpf due to the last minute extra travel expenses and
> unnecessary expenses being attached to my case if I can pay $1000.00 next
> week (Tuesday) and $1000.00 the week after (Friday) .
>
>
>
> Please ask him if the contempt charges are sent up with the case when it
> is reviewed for appeal or is it separate ? If it’s included it seems the
> contempt charges were placed to sway and damage chances for appeal and
> discredit my witness who is my spouse. Is there a way to stick only to the
> case and prevent any outside contempts from going up with the case?
>
>
>
> An appeal is needed and I’m grateful for his help with the matter
>
>
>
> Grateful
>
> The “REAL” John King
>
>
>
> On Fri, Nov 22, 2024 at 10:30 AM Jinnifer LeBlanc <
> jleblanc@schrumpf-law.com> wrote:
>
> Good morning,
>
> Attached is our letter to Judge Richard and the Contempt Hearing
> Notice and Rule.
>
>
> Thank you,
> Jinnifer Marcantel

> Paralegal to Oliver “Jackson” Schrumpf
>
> Schrumpf Law Office, PLC
> 3801 Maplewood Drive
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA+70663?entry
=gmail&source=g>
> Sulphur, LA 70663
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA+70663?entry
=gmail&source=g>
> (337) 625-9077
> (337) 625-8231 (fax)
>
> **If you have not executed a binding fee agreement or an agreement for
> representation, this firm does not represent you and this email is not an
> agreement of representation.**
>
> ***Please note that unless expressly stated otherwise, I have NOT
> expressly designated my email address as appropriate for electronic
> service of a pleading or other writing under LA CCP 1313.***
>
> Confidentiality Statement: This e-mail transmission, and any documents,
> files, or e-mail messages attached to it, may contain confidential
> information that is attorney work product and/or legally privileged. The
> information herein is also protected by the Electronic Communications
> Privacy Act, 18 U.S.C.A. 2510-2521. The information contained in this
> message and any file transmitted with it is transmitted in this form based
> upon a reasonable expectation of privacy consistent with ABA Formal
> Opinion No. 99-413. If you are not the intended recipient, or the person
> responsible for delivering it to the intended recipient, you are hereby
> notified that any disclosure, copying, distribution or use of any of the
> information contained in or attached to this transmission is STRICTLY
> PROHIBITED. If you have received this transmission in error, please notify
> sender immediately via return email or by telephone at (337) 625-9077 and
> destroy the original transmission and its attachments without reading them
> or saving them to disk or otherwise. Thank you.
>
>

**John CJ King Sr.
Plaintiff, Pro Se**
**VS Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana**

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions**
Dear Honorable Judge Richard,**

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions
Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  **Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601**
  kamiedominiclaw@gmail.com

- "The Hartford": Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of

further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant’s Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant's claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested
In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Thank you for your time and consideration.

Respectfully submitted,
John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Exhibits attached audio mailed separately.

Respectfully submitted by
John CJ King Sr.
123 N. Louisiana Avenue
Lake Charles LA 70601
truekingfile@gmail.com
318-995-1705

ORDER

Considering the foregoing motion IT IS ORDERED that this matter come on for trial on the ____ day of _____ or the year 2024 or 2025 at _____ o'clock AM Lake Charles, Louisiana this day of _____

STATE OF LOUISIANA
PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared John CJ King Sr., who, after being duly sworn, did depose and say:

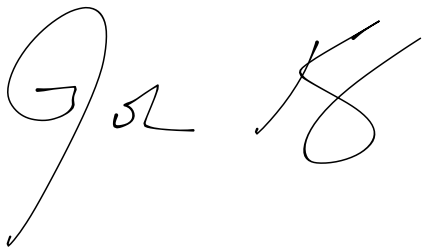
1. **Affiant's Personal Knowledge: I, John CJ King Sr., am the plaintiff in case number VS NO. 23-2124, currently pending before the Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.**
2. **Grounds for Motion: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.**
3. **Request for Continuance: Due to this medical condition, I am unable to attend the hearing scheduled for November 14, 2024, and respectfully request a continuance to allow sufficient time for my medical recovery and to secure adequate legal representation.**
4. **Truthfulness of Submissions: I affirm that all statements and evidence presented in this motion are submitted in good faith, without any intent to delay, defraud, or deceive the Court or any party. The attached documents are accurate and true representations of my medical status and travel**

records, provided to substantiate my request.

5. **Opposition to Frivolous Claims and Sanctions: I further affirm that my responses to the defendant's Motion to Strike and Motion for Sanctions are made in good faith, as I have provided evidence to support all claims filed in this matter. I deny any claims of fraudulent inducement, and I respectfully request that the Court deny the defendant's motions accordingly.**

Further, Affiant saith not.

Signature: _____



John CJ King Sr.

Date: ___10/31/2024_____

Sworn to and subscribed before me this _____ day of _____, 2023.

Notary Public

My Commission Expires: _____

This affidavit should be signed and notarized to accompany your motion.

4o

Official Witness Statement of…

Vincent Luu Co- Owner

Arrival Fitness

87 Halsey St, Newark NJ 07102

Vincentluu@arrivalfit.com

Date: March 11, 2024

I, Vincent Luu, being of sound mind and body and the owner of Arrival Fitness located in the state of New Jersey, USA, do hereby provide this witness statement in connection with the presence of John King Sr at my fitness facility on September 6, 7, and 8, 2021.

I affirm that John King Sr was physically present at Arrival Fitness on the aforementioned dates. On September 6, 2021, the workout session took place outdoors at Military Park, which is located within the state of New Jersey, due to the facility being closed in the days leading up to September 6, 2021, as a result of flooding. The state of New Jersey was under a state of emergency during this time, as confirmed by emails time-stamped and sent to John King Sr, notifying him that the workout would have to take place outside on the morning of September 6, 2021.

Several members attended the morning classes at Military Park on September 6, 2021, with John King Sr being one of them. Subsequent days, September 7 and 8, also saw John King Sr participating in the morning classes within the facility premises once it reopened.

I can attest to having known John King Sr for nearly three years, further confirming his regular attendance at Arrival Fitness. Attached herewith are screenshots of videos and photos, as well

as a copy of the attendance record for September 6, 7, and 8, 2021, all of which are date and time-stamped, serving as concrete evidence of John King Sr's presence.

The witnesses present alongside John King Sr during these sessions include Jason DeJesus, Romeo Delacruz, Justin Lewis, Chanel Alexander, Shunte King, and others listed in the attendance record. While some may not feature in the provided exhibits, their presence is duly noted.

Should further verification be required, I can be contacted at 862-231-5202 or via email at Vincentluu@arrivalfit.com. I am willing to confirm under oath that John King Sr was physically standing in the state of New Jersey at Arrival Fitness on September 6, 7, and 8, 2021.

Signed

Vincent Luu

Vincent Luu

Co- Owner, Arrival Fit

(Notary Stamp located under exhibits)

State of Florida
County of Miami-Dade
Sworn to (or affirmed) and subscribed before me by means of online notarization, this 03/11/2024 by Vincent Han Luu.

Carola Villamizar

CAROLA VILLAMIZAR
Notary Public - State of Florida
Commission # HH 427934
Expires on July 31, 2027

Carola Villamizar

___ Personally Known OR __✔ Produced Identification

Type of Identification Produced __DRIVER LICENSE

Notarized remotely online using communication technology via Proof.

Exhibits enclosed of attendance records for dates above, time stamped imaging/video, emails to John King Sr.

Attached here

Newark
September 8, 2021 8:33 AM

Edit



.



Add a Caption

Wednesday • Sep 8, 2021 • 8:33 AM

Adjust

IMG_2117

Apple iPhone 11

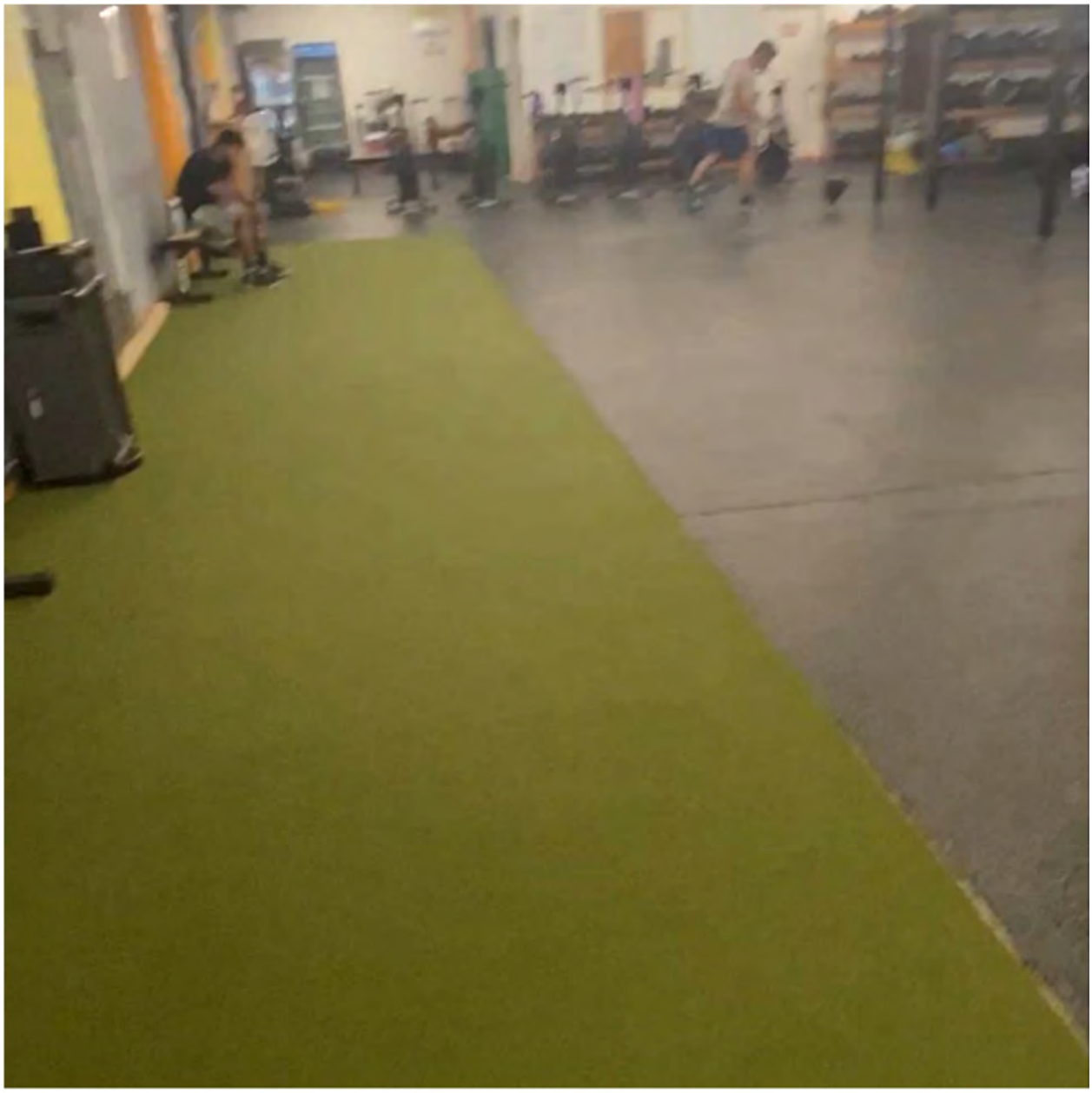
HEIF

Wide Camera — 26 mm ƒ1.8

12 MP · 3024 × 4032 · 2 MB

ISO200 | 32mm | 0ev | ƒ1.8 | 1/60s





Add a Caption

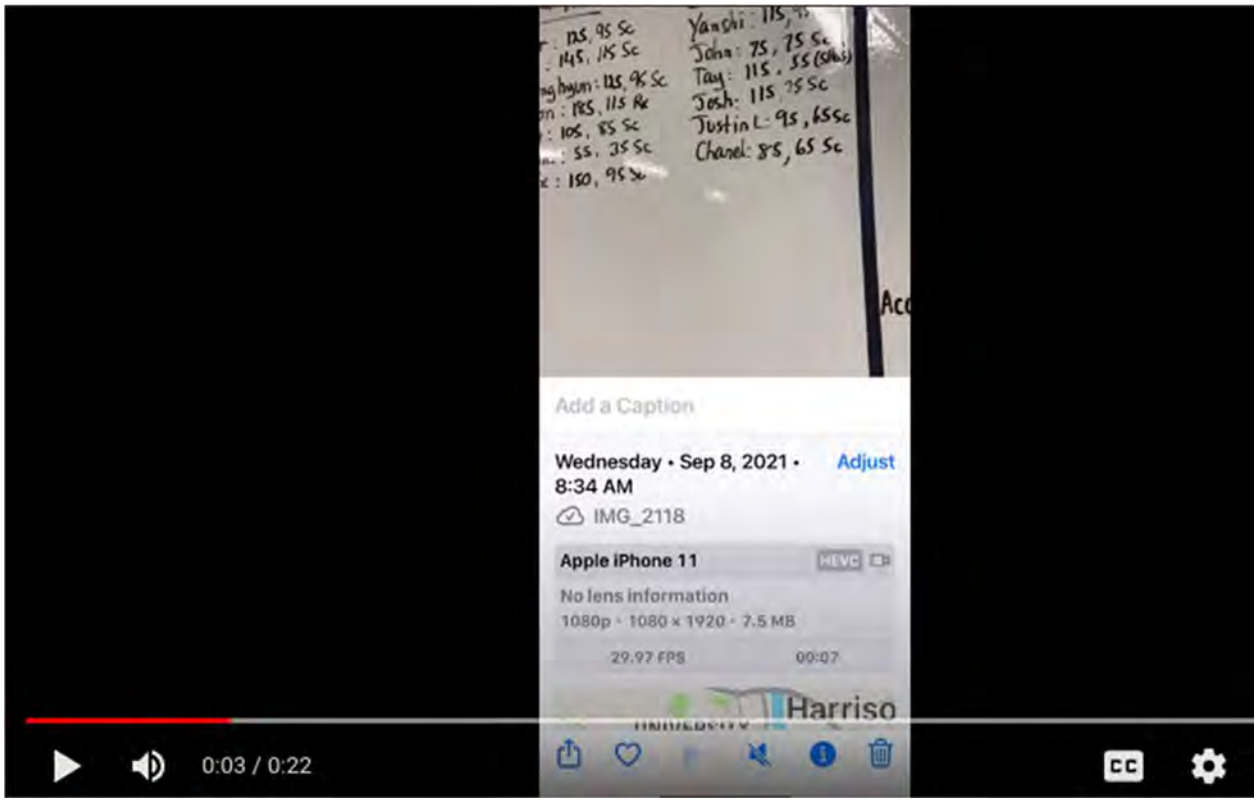
Wednesday • Sep 8, 2021 • 8:34 AM

Adjust

IMG_2118

Apple iPhone 11

HEVC



Sept 6 Morning attendance military park NJ

Military Park
September 6, 2021 9:18 AM

Edit



Add a Caption

Monday • Sep 6, 2021 • 9:18 AM

Adjust

IMG_1955

Apple iPhone 11

HEVC

No lens information

1080p · 1080 × 1920 · 18.8 MB

29.99 FPS | 00:19



Section Allocated for Notary Seal

I, Vincent Luu verify to the best of my knowledge that the statements and exhibits above are true.

Signed

Vincent Luu

Schrumpf Law Office

A Professional Law Corporation
3801 Maplewood Drive
Sulphur, Louisiana 70663

Oliver "Jackson" Schrumpf*
Stacy D. Saltzman†

(337) 625-9077
Fax: (337) 625-8231

* Licensed in LA and TEXAS
† Licensed in LA and MISSISSIPPI

November 22, 2024

VIA EMAIL: ron@lccitycourt.org and mabshire@lccitycourt.onmicrosoft.com

Honorable Judge Ron Richard
Lake Charles City Court
118 W. Mill Street
Lake Charles, LA 70601

Re: John Clifford J King
Vs. 2023-2124
Renee Amos, Notary Public
Notary ID #29374
Lake Charles City Court

Dear Judge Richard,

Please be advised that I do not represent Shunte King in the contempt of court proceeding. Attempted service on me for the contempt proceeding is not effective.

Respectfully,

Oliver Schrumpf

Oliver "Jackson" Schrumpf

OJS/jm


Patient Transport
General
Elevators

Gmail **John King <johncjking86@gmail.com>**

October continuance King Case #23-2124

2 messages

True King <truekingfile@gmail.com> Thu, Oct 31, 2024 at 5:27 PM
To: True King <truekingfile@gmail.com>, John King <johncjking86@gmail.com>
Cc: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Please find motion attached a fax copy has been faxed and physical copy mailed please call to process any payment but is a pauper

Contiuanceactober.pdf
368K

True King <truekingfile@gmail.com> Thu, Oct 31, 2024 at 9:12 PM
To: True King <truekingfile@gmail.com>, John King <johncjking86@gmail.com>
Cc: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Ms Abshire,
Please find video and images and audio files attached to accompany motion as I have confidentially spinal disease resulting from traumatic impact and has been degenerative and as of last week the paralysis has set in.

Ambulance photos hospital admissions and spinal cord compression prevents ability to walk without walker and neck brace. The seizures also accompany this disorder.

On top of having my assets stolen job taken yes I was told my son was dying had to have emergency surgery this was a lie to get me to run to lake charles and as a result I now have degenerative skeletal disease.

These games they are playing filing frivolous motions are playing with my life and is another form of financial abuse.

Please attach for Judge Richard they're trying to drag this out until I die in order to cover up what has been done to me.

Physical copy mailed separately only one faxed copy needs to be filed of continuance please tell me the amount owed.

And yes I'm still being harassed and so is my family.
JCJKing



[Quoted text hidden]

5 attachments



IMG_3394.jpeg
104K



IMG_3395.jpeg
89K



A2684C5B-4F83-4F62-853A-98E8FE6B5D64.jpeg
2031K



EAC37BC8-BFB1-41BE-872D-85E5FF774032.jpeg
2466K

IMG_1561.mp4
4706K

RE: Emailing: 23-2124 King vs. Amos - Statement (2)

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>, ed@lakecharlesattorney.com

Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>, Kay Bang <kay.bang@lccitycourt.org>

Bcc: truekingfile@gmail.com

Date: Thu, 09 Jan 2025 14:48:51 -0600

Monica, I believe I will also need a certified copy of the minutes of December 30, 2024 hearing and a certified copy of the prior Order granting In Forma Pauperis status to John King in this case.

Please advise when I may send a runner for these items. Thank you.

Oliver "Jackson" Schrumpf
Schrumpf Law Office (PLC)
3801 Maplewood Drive
Sulphur, LA 70663
Phone: 337-625-9077
Fax: 337-625-8231
oschrumpf@schrumpf-law.com

-----Original Message-----
From: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>
Sent: Tuesday, January 7, 2025 11:09 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>; ed@lakecharlesattorney.com
Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>; Kay Bang <kay.bang@lccitycourt.org>
Subject: Emailing: 23-2124 King vs. Amos - Statement (2)

Good Morning -

Please see attached the statement for cost of the transcript prepared for hearing held on 12/30/2024.

Mr. Schrumpf - Transcript is ready. Do you want to send someone to pick up or do you want me to place in the mail? Also, do you want a refund of the difference of the cost of transcript?

Mr. Bauman - If you would like a copy of transcript, please send request in writing along with the statement payment to Lake Charles City Court.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court

(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs. Amos - Statement (2)

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Emergency Notice of Prohibited Fee Enforcement

Plaintiff submits this Emergency Notice to preserve all rights before expiration of the statutory period and to document ongoing prohibited enforcement attempts. Plaintiff contacted the Clerk of Lake Charles City Court on this date to request removal of fees and costs that were entered after the Court was divested of jurisdiction on December 3 2024. The Clerk refused and stated that Judge Ronald C Richard is demanding that Plaintiff pay these fees.

All fees assessed after December 3 2024 are void under Louisiana Code of Civil Procedure article 2088. The Court lacked authority to issue orders hold hearings generate service returns or impose costs. Plaintiff has never provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and any fees based on those returns are fraudulent and unenforceable.

The Clerk refusal to remove void fees and the judge ongoing demand for payment constitute retaliation intimidation and abuse of authority. Plaintiff submits this Notice to ensure the record reflects that Plaintiff has objected to all post divestiture fees and that any attempt to enforce them now or in the future is unlawful and constitutes retaliation under state and federal law.

Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

Emergency Notice of Prohibited Fee Enforcement

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Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

ORDER DIRECTING SERVICE ON DEFENDANTS

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff
Calcasieu Parish District Attorney
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator
Defendants

Civil Action No _____

ORDER GRANTING LEAVE TO AMEND

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity

Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

ORDER GRANTING LEAVE TO FILE FIRST AMENDED COMPLAINT

Considering Plaintiffs request for leave to file their First Amended Civil Rights Complaint

IT IS ORDERED that leave is GRANTED.

IT IS FURTHER ORDERED that the First Amended Civil Rights Complaint tendered by Plaintiffs is accepted and shall be filed into the record.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

WESTERN LOUISIANA FEDERAL COURT

NOTICE OF SUBMISSION

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

Civil Action No _____

NOTICE OF SUBMISSION

TO Clerk of Court
United States District Court
Western District of Louisiana
Lake Charles Division

PLEASE TAKE NOTICE that the following motions are hereby submitted to the Court for consideration on the papers unless the Court orders a hearing

1 Motion to Proceed Under Pseudonym
2 Motion for Temporary Restraining Order and Preliminary Injunction
3 Any related motions filed concurrently with Plaintiffs First Amended Civil Rights Complaint

Respectfully submitted
Dated November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

ORDER TO SHOW CAUSE

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAKE CHARLES DIVISION

S J K
and
J K
Plaintiffs

V

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

All Defendants listed above
Defendants

Civil Action No _____

ORDER TO SHOW CAUSE

Considering the allegations in Plaintiffs First Amended Civil Rights Complaint and the pendency of Plaintiffs Motion for Temporary Restraining Order

IT IS ORDERED that Defendants shall SHOW CAUSE in writing no later than _21___ days from entry of this Order why the preliminary relief requested should not be granted.

IT IS FURTHER ORDERED that Defendants shall specifically address the following issues

1 Whether Plaintiffs have demonstrated a likelihood of success on their constitutional claims
2 Whether Plaintiffs face ongoing irreparable harm
3 Whether Defendants oppose the requested injunction and on what factual and legal basis
4 Whether any factual disputes require an evidentiary hearing

Failure to respond may result in the issuance of injunctive relief based on the existing record.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

ORDER DIRECTING SERVICE ON DEFENDANTS

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff
Calcasieu Parish District Attorney
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator
Defendants

Civil Action No _____

ORDER DIRECTING SERVICE OF PROCESS

IT IS ORDERED that the Clerk of Court shall issue summonses for each named Defendant.

Hon Ronald C Richard
Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

City of Lake Charles
1001 Ryan Street
Lake Charles Louisiana 70601

Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

Calcasieu Parish Police Jury
1015 Pithon Street
Lake Charles Louisiana 70601

Calcasieu Parish Clerk of Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish Sheriff
5400 East Broad Street
Lake Charles Louisiana 70615

Calcasieu Parish District Attorney
1020 Ryan Street
Lake Charles Louisiana 70601

Fourteenth Judicial District Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish District Court Administrator
1000 Ryan Street
Lake Charles Louisiana 70601

IT IS FURTHER ORDERED that service of the First Amended Civil Rights Complaint and accompanying motions shall be made pursuant to Federal Rule of Civil Procedure 4 and all applicable local rules.

IT IS FURTHER ORDERED that Plaintiffs service address shall remain under seal and shall be disclosed only to the United States Marshal or other authorized service officer for purposes of effectuating service.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

PROPOSED SCHEDULING ORDER

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

Civil Action No _____

SCHEDULING ORDER

IT IS ORDERED that the following schedule shall govern this action unless modified by the Court

1 Initial disclosures under Federal Rule of Civil Procedure 26a shall be exchanged on or before _____

2 All amended pleadings shall be filed on or before _____
3 All motions to dismiss shall be filed on or before _____
4 All discovery shall be completed by _____
5 Expert reports shall be exchanged on or before _____
6 Dispositive motions shall be filed no later than _____
7 The pretrial conference is set for _____ at _____
8 Jury trial or bench trial is set for _____ at _____
9 Settlement conference as directed by the United States Magistrate Judge

SO ORDERED this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

WESTERN LOUISIANA DISTRICT

FOOTNOTES APPENDIX

FOOTNOTES APPENDIX

1 FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION protects the right to petition the government for redress and prohibits retaliation.

2 FOURTH AMENDMENT prohibits unreasonable seizures and unlawful detention.

3 FOURTEENTH AMENDMENT guarantees due process and equal protection.

4 NINTH AMENDMENT protects unenumerated rights including privacy and security.

5 42 U S C SECTION 1983 provides a cause of action for violations of constitutional rights under color of state law.

6 28 U S C SECTIONS 2201 AND 2202 authorize declaratory and injunctive relief.

7 LOUISIANA CONSTITUTION ARTICLE I SECTION 2 guarantees due process of law.

8 LOUISIANA CONSTITUTION ARTICLE I SECTION 3 prohibits arbitrary discrimination.

9 LOUISIANA REVISED STATUTES TITLE 46 SECTION 1844 provides for crime victim confidentiality.

10 LOUISIANA REVISED STATUTES TITLE 14 SECTION 72 addresses forgery.

11 LOUISIANA REVISED STATUTES TITLE 14 SECTION 67 addresses theft.

12 LOUISIANA REVISED STATUTES TITLE 14 SECTION 73 addresses computer fraud.

13 STATE CREATED DANGER doctrine recognizes liability when officials create or enhance danger.

14 MONELL LIABILITY under 42 U S C SECTION 1983 imposes liability on municipalities for unconstitutional policies or customs.

15 OFFICIAL CAPACITY suits are treated as actions against the governmental entity itself.

COURT OF APPEAL

THIRD CIRCUIT

STATE OF LOUISIANA

NO. 2025-0049-CA

JOHN CLIFFORD J. KING

Plaintiff/applicant

VERSUS

RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY

Defendants-respondents

DEVOLUTIVE APPEAL BRIEF OF PLAINTIFF

ON DEVOLUTIVE APPEAL FROM THE WARD 3 / LAKE CHARLES CITY COURT PARISH OF CALCASIEU, STATE OF LOUISIANA NO. 23-2124

HONORABLE RON RICHARD, PRESIDING

ORIGINAL BRIEF OF PLAINTIFF-APPELLANT, JOHN CLIFFORD J. KING,

A CIVIL CASE

Respectfully submitted:

Oliver Schrumpf

Oliver "Jackson" Schrumpf
Attorney for Applicant
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
Appeal Counsel
Bar Roll No. 11832

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La. Code of Civil Procedure Article 2081

JURISDICTIONAL STATEMENT

The Third Circuit Court of Appeal has jurisdiction to hear civil

appeals from the Ward 3- Lake Charles City Court for the Parish of Calcasieu, State of Louisiana, pursuant to La. Constitution of 1974, Article V., Section 10, granting authority to hear civil appeals from all cases arising in this Circuit; and based upon La. Code of Civil Procedure Articles 2081, et seq. This is an appeal from a final judgment dated November 21, 2024 dismissing plaintiff's claims with prejudice. [Record Vol. III, P. 547].

Notice of Judgment was sent November 21, 2024 [Record Vol. III, P. 570]

A Motion and Order of Devolutive Appeal was signed December 3, 2024 or December 5, 2024. [Record Vol. III, PP. 581, 583, 588]

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4

I. STATEMENT OF THE CASE

FACTS:

John Clifford King, whose permanent residence was at his mother's house at 123 N. Louisiana Avenue, Lake Charles, La., worked out of town (in New Jersey and New York State) after Hurricane Laura. Mr. King

owned a 2011 red Chevrolet Traverse, La. license No. 346EYM, which he left at his mother's house and which he allowed his former girlfriend, Charmaine Colston, to drive to evacuate for Hurricane Laura. Unknown to Mr. King, while he was *in* New Jersey or working in New York state, on or about September 7, 2021, Charmaine Colston (either by herself or in conspiracy with someone else) appeared before a Notary, Renee Amos, in Lake Charles, La. and executed a fraudulent title transfer of the Chevrolet to Colston. Mr. King did not learn of this fraudulent transfer until August 25, 2022 when an investigative report of the Lake Charles Police Department was released to him. Meanwhile Charmaine Colston had sold the vehicle. When Mr. King stopped paying for insurance [Record Vol. III, P. 708 (Trial Transcript pp. 61-63)] on the Chevrolet, his license was suspended by the Louisiana Department of Motor Vehicles. It took money and effort by Mr. King to have his license re-instated. Also, Mr. King paid off the $8,400 balance owed on the vehicle. Mr. King instituted a suit against the Notary, Renee Amos, for executing a title transfer for Charmaine Colston when he, the title owner, was not present and did not sign [See

pleading Vol. I, PP. 9-13]. The trial on the merits was held November 14, 2024. The Trial Court, Hon. Ron Richard, was satisfied from the testimony

that John Clifford King was indeed out of state on September 7, 2021, when the title transfer occurred [Vol. IV, PP. 758-759 and record Vol. IV, PP 755-756 (See Trial Transcript p. 109, line 23-p. 110, line 16; and p. 115, lines 1-7)]. However, the Court relied upon the Notary's testimony that, although she had no recollection of this particular transaction, she testified that "my practice is to check the ID's of all parties, the buyer and the seller." [Record Vol. III, P. 665 (Transcript p. 19, lines 7-8)]. Mrs. Amos did not retain copies of the ID's [Record Vol. III, P. 666 (Transcript p. 20, line 21)].

She did not know Mr. King and would not have recognized him except for seeing him in Court in multiple proceedings. [Record Vol. III. PP. 666-667 (Transcript pp. 20-21)]. Ms. Amos had no memory of what happened on September 7, 2021. [Record Vol. III. P. 668 (Transcript p. 22, lines 11-12)].

Ms. Amos could not recall whether the alleged $100 consideration was paid or, if it was paid, in what manner it was paid [Record Vol. III. PP. 668-669 (Transcript p. 22, line 24 – p. 23, line 8)]. Ms. Amos did not keep a copy of the driver's license of the person she claimed signed the title transfer that day "because of the massive amount of people I see in a day, I could not possibly keep those records." [Record Vol. III, P. 669 (Transcript p. 23, lines 18-20)].

Mr. King paid off the balance owed on the car ($8400) on April 5, 2021. [Record P. 706] Mr. King kept the car continuously insured until February 2022 [Record P. 708]. Then Mr. King's Louisiana Driver's License was suspended because the car was not insured. [Record P. 709] It cost $875 to get his license re-instated [Record P. 709]

PRIOR PROCEEDINGS:

The trial court previously denied exceptions of prescription, not at

issue here.

The Court granted a Motion to Enroll for Oliver Schrumpf on November 7, 2024, but denied Schrumpf's motion to continue the trial. Trial was held November 14, 2024. The Court ruled the same day dismissing plaintiff's claims with prejudice and Judgment was signed November 21, 2024. [Vol. III, P. 547]

A Motion and Order for Devolutive Appeal was signed December 3, 2024. [Vol. III, P. 581]

The Court previously revoked pauper status after appeal was filed. This order was reversed by writ grant. (La. Third Circuit, CW 25-00044).

II. SPECIFICATIONS OF ERROR

A. **The Trial Court erroneously applied the burden of proof; after plaintiff proved he was out of state at the time the Notary allegedly notarized his signature to the title transfer, the burden of proof should have shifted back to the Notary to prove she properly identified John Clifford King as the signor.**

B. **The Trial Court erred in faulting plaintiff for not calling Charmaine**

Colston as a witness since Colston was the perpetrator who stole the vehicle; either party could have subpoenaed Colston. But Colston's testimony was unnecessary. The Notary failed to identify John King or anyone else as the signor.

ISSUES PRESENTED FOR REVIEW

Once the Trial Court was satisfied that John King proved that he was 1,500 miles away from Lake Charles, Louisiana at the time the Notary, Renee Amos, allegedly notarized a document transferring his Chevrolet to Charmaine Colston, did the burden of proof shift back to the Notary to show she was not negligent in identifying the person who signed the title transfer?

Did the Notary meet the burden of proof to show she was not negligent in executing a title transfer to Charmaine Colston when the owner, John King, was not present?

SUMMARY OF ARGUMENT

Once the plaintiff proved that he was in New York State or New Jersey on September 7, 2021, at the time the Notary, defendant Renee Amos, allegedly notarized his signature to a title transfer selling King's Chevrolet to Charmaine Colston for $100, the burden of proof should have shifted to defendant, Notary, to exculpate herself from presumed negligence or co-conspiracy with Colston in the transaction.

The Notary's claim that she "always checks ID's" but does not keep copies of the ID's and does not remember the incident on September 7, 2021, failed to absolve her of responsibility for executing a transfer when the owner was not present. The Notary and her bonding company should be held liable for the damages to the extent of the bond ($10,000.00).

III. MEMORANDUM OF LAW

IS A NOTARY LIABLE FOR FAILING TO IDENTIFY THE SELLER IN A BILL OF SALE? YES!

See Collins v. Collins, No. 93-CA-518. (Court of Appeal of Louisiana, Fifth Circuit. Dec. 15, 1993. Rehearing Denied Jan. 18, 1994. 629 So.2d 1274:

"In **Webb v. Pioneer Bank & Trust Co., 530 So.2d 115 (2nd Cir.1988)**, the court held that a wife was entitled to damages against her husband who had caused her signature to be forged on a mortgage affecting community property. Clearly, in the instant case, plaintiff Collins' petition stated a cause of action against his ex-wife for the sale of community property without his concurrence. ...

As to stating a cause of action against the notary, the law is clear that a notary is liable both for deliberate misfeasance in the course of his official duties, and for negligence in performing those duties.

In Summers Brothers, Inc. v. Brewer, 420 So.2d 197 (1st Cir. 1982) the court upheld a judgment against a notary who notarized a document containing forged signatures. The court said at page 204:

"Even if Mills did not know that the signatures on the contract were forgeries, he knew that by authenticating the document, as notary, he was telling the world that the parties had appeared before him and affixed their signatures in his presence. Thus, he committed fraud in that he purposely let third parties rely on a document purporting to be genuine but actually without validity as an authentic act. The 'proof' of validity he supplied was misleading to all who relied on the contract."

The court also recognized that a notary was liable for deliberate misfeasance occurring during the course of his official notarial duties.

In Webb, supra, the court found that the notary who notarized the note in the mortgage but could not recall whether the wife's signature was affixed in his presence was negligent for failing to exercise ordinary care in ascertaining the genuineness of the signature allegedly fixed in his presence, citing LSA- R.S. 35:2 and R.S. 35:198.

The court in Levy v. Western Casualty & Surety Co., 43 So.2d 291 (2nd Cir.1949) recognized that under certain circumstances, a notary could be negligent for failing to get proof of identification from a person signing a document in his presence.

Considering the above jurisprudence, we find it clear that plaintiff's petition stated a cause of action against both defendants Juanita Eskew Collins and notary Leonard J. Cline. Therefore, the exception of no cause of action must be overruled."

The Trial Court erroneously applied the burden of proof: after plaintiff proved he was out of state at the time the Notary allegedly notarized his signature to the title transfer, the burden of proof should have shifted back to the Notary to prove she properly identified the person who signed as if he were John Clifford King.

THE BURDEN OF PROOF SHIFTS TO DEFENDANT:

Once the plaintiff has established a prima facie case, the burden of proof shifts to the defendant to attempt to exculpate herself. In this case, defendant relied on her lack of memory and a claim that she always checks IDs.

Plaintiff proved at trial that he was not in the State of Louisiana at the time the Notary, Renee Amos, executed the transfer of the vehicle on behalf of Charmaine Colston. Therefore, the burden of proof shifted to the defendant Notary to explain how she notarized a bill of sale when the seller was not in her presence and in fact was approximately 1,500 miles away.

Louisiana courts have shifted the burden to defendants in numerous instances once plaintiffs have established basic facts.

For instance, see Lawrence V. Government Employees Insurance Company, La. Court of Appeal, 4th Cir, No. 2013-CA-1296, 10-14-2014), 151 So.3d 917, in which the Court stated:

The normal burden of proof in a personal injury case is upon the plaintiff. However, in exceptional cases when a plaintiff-motorist is without fault (such as when he is in his own lane and is struck head-on by an

oncoming motorist, as in Simon v. Ford Motor Co.,282 So.2d 126 (La.1973)), "the (defendant) driver is required to exculpate himself of any fault, however slight, contributing to the accident." Simon v. Ford Motor Co., 282 So.2d 126, 133. Simon v. Ford Motor Co., supra, followed the rationale of Rizley v. Cutrer, 232 La. 655, 95 So.2d 139 (1957), ...

[66] ... In Loescher v. Parr, 324 So.2d 441 (La.1975), we examined the principle of fault in Louisiana covered by Civil Code articles 2315-2322. There it was found that delictual responsibility did not necessarily depend upon negligent acts, but upon fault, and that the owner or custodian of an instrumentality which causes unreasonable risk of injury to others is at fault. Turner v. Bucher, 308 So.2d 270 (La. 1975); Holland v. Buckley, 305 So.2d 113 (La.1974). Once the injured person proves damages from an unreasonable risk of harm to others of the offending instrumentality, "the owner or guardian responsible for the person or thing can escape liability only if he shows the harm was caused by the fault of the victim, by the fault of a third person, or by an irresistible force." Loescher v. Parr, 324 So.2d 441, 447.

Arceneaux v. Domingue, No. 62446. (Supreme Court of Louisiana, Dec. 15, 1978; Rehearing Denied Jan. 26, 1979), 365 So.2d 1330

This incident is similar in that John Clifford King showed he was without fault (He was not in the State of Louisiana at the time the Notary claimed to be notarizing his signature to a bill of sale.). Therefore, the burden of proof shifted to the Notary to prove she was without fault. Mere

reliance on "I don't recall" or "I always get identification, but I did not keep copies." Is an inadequate defense.

Once John Clifford King proved he was not in the state of Louisiana on September 7, 2021, the burden of proof should have shifted to the Notary, Renee Amos, to prove she was not negligent in performing her notarial duties, including identifying the person (if any) whom she claimed signed the Bill of Sale as "John Clifford King". Mrs. Amos was unable to do so. Instead, Ms. Amos relied on her inability to recall the circumstances and her claim that she "always has the parties identify themselves". This

defense rings hollow when it is shown that John Clifford King was 1,500 miles away at the time she claims he appeared before her to sign the title.

The Trial Court erred in faulting plaintiff for not calling Charmaine Colston as a witness since she is the perpetrator who stole

the vehicle; either party could have subpoenaed Colston; the Notary could have Third-partied Colston; but this does not diminish the Notary's fault.

The trial court [Record Vol. IV., PP. 759 (Transcript p. 113)] ruled that without Charmaine Colston present to testify the Court could not find the defendant Notary at fault. The Court placed responsibility on plaintiff, John C. King, for not subpoenaing Charmaine Colston to be present to testify. Counsel confesses to watching many television episodes of Perry Mason and finding that upon Mason asking deep questions such as "What is your name?" the culprit who has acted deceptively, cunningly, and illegally up to that point suddenly becomes overwhelmingly remorseful and admits to having done the illegal act, absolving Perry Mason's client. However, undersigned counsel does not profess to be as good an attorney as Perry Mason was on his television episodes. The undersigned counsel would have expected Charmaine Colson to continue whatever subterfuge she had engaged in to obtain title to the car unlawfully. Counsel for plaintiff would not consider it reasonable to ask the conspirator or perpetrator to confess the

evil she had carried out; so why subpoena the thief to hope for a full confession?

Furthermore, the defendant, Rene Amos, had an equal right to subpoena Charmaine Colston to testify. Had defendant subpoenaed Colston, Colston could have testified to the specifics of how she carried out the fraud: Possible scenarios: (1) She had someone else sign the back of the title and presented it to Amos to notarize, or (2) She had a co-conspirator appear with a fake i.d. to sign in front of Amos; or (3) some other scenario. [Under each of these scenarios, the Notary would be at least negligent for notarizing the transfer without properly identifying the seller.]

Or maybe Colston would have testified that John Clifford King was present and signed the title in the presence of Renee Amos. But we know that John Clifford King did NOT appear before Renee Amos on 9-07-2021 and did not sign the title transfer. In fact, Mr. King did not know he had

lost the vehicle to Colston because he continued paying the insurance on it for almost another year until he learned it had been stolen and sold by Colston. [Record Vol. III, P. 708 (Trial transcript pp 61-63)]. So what did plaintiff have to gain by subpoenaing Colston to testify for plaintiff? In fact, if counsel for plaintiff had subpoenaed Colston to appear, he would have had to ask the Court to treat her testimony as that of an adverse witness, he could not rely on whatever she might say. Colston's absence from the proceeding was really not a factor. Under any scenario, the Notary was either part of the fraud or at least negligent in notarizing the transfer since John King was not present.

STANDARD OF REVIEW: De Novo. The trial court applied the incorrect burden of proof. There were no credibility issues.

"Generally, an appellate court may not set aside a trial court's findings of fact in the absence of "manifest error" or unless it is "clearly wrong." Rosell v. ESCO, 549 So.2d 840, 844 (La. 1989). However, if a legal error by the trial court interdicts the fact-finding process, the manifest error standard of review is no longer applicable, and, if the record is otherwise complete, the appellate court should conduct an independent de novo review of the record. Chambers v. Village of Moreauville, 11-898 (La. 1/24/12), 85 So.3d 593, 597. A legal error occurs when a trial court applies incorrect principles of law. Such errors are prejudicial when they materially affect the outcome of a matter and deprive a party of substantial rights. Chambers, 85 So.3d at 597. The failure of a trial court to apply a heightened burden of proof when required by law to do so is a prejudicial legal error that vitiates a trial court's factual findings, because the error skews the trial court's findings. See In re Succession of Jones, 08-1088 (La. App. 3d Cir. 3/4/09), 6 So.3d 331, 336. Accordingly, because the trial court committed legal error in not applying the heightened burden of proof applicable in this case, we will now conduct a de novo review of this matter." Estate of Robert E. Riggs v. Way-Jo, L.L.C; Sarah M. Kent vs. The Succession of Robert E. Riggs and Way-Jo, L.L.C.; 2011 CA 1651; 2011 CA 1652; State of Louisiana, Court of Appeal First Circuit; December 28, 2012, Not designated for publication.

ARGUMENT:

There were no credibility determinations in this case that the Court relied upon. The trial court found the testimony of all witnesses credible.

The Court simply applied the wrong burden of proof.

Once the Court was satisfied by the testimony that Mr. King was not present at the transaction on September 7, 2021 when the Notary, Renee Amos purportedly notarized his signature on a car title transfer; and, in fact, the Court found that Mr. King was out of the state of Louisiana (in New Jersey or New York), and that Mr. King could not have physically been present in Louisiana [Record pp. 755-756 (Transcript pp. 109-110)], the burden of proof should have shifted back to Renee Amos, to show that her

"procedures" were actually followed on September 7, 2021. Amos' claim that "my practice is to check the ID's of all parties, the buyer and the seller." [Record Vol. III, p. 665] is inadequate when compared to the fact that Mr. King was not present. Was Ms. Amos negligent in comparing the identification cards? Dis Ms. Amos err in checking the names or the photos? Ms. Amos should have produced a copy of the ID's used on September 7, 2021, or she should be held liable for the consequences of the

fraudulent transaction.

Renee Amos did not know Mr. King and would not have recognized him except for seeing him in Court in multiple proceedings. [Record Vol. III P. 666 (Transcript pp. 20-21)]. Ms. Amos had no memory of what happened on September 7, 2021. [Record Vol. III, P. 668 (Transcript p. 22, lines 11-12)]. Ms. Amos could not recall whether the alleged $100 consideration was paid or, if it was paid, in what manner it was paid [Record Vol. III, PP. 668-669 (Transcript p. 22, line 24 - p. 23, line 8)]. Ms. Amos did not keep a copy of the driver's license of the person she claimed signed the title transfer that day "because of the massive amount of people I see in a day, I could not possibly keep those records." [Record Vol. III, P. 669 (Transcript p. 23, lines 18-20)].

Renee Amos signed as Notary attesting that Mr. King appeared before her when he was in fact 1,500 miles away. There was obviously a flaw in her procedures. The burden should have fallen on Renee Amos to extricate

herself from liability. Mr. King proved he was not present.

CONCLUSION and PRAYER

The Court has before it all the facts and testimony from trial. The Court of Appeal should reverse the lower court judgment and render judgment in favor of plaintiff, John Clifford King, and against defendants, Renee Amos and her bonding insurer, Hartford, in the amount of the Notary bond, $10,000.00, plus all costs of court and this appeal.

Respectfully submitted by Attorney for Applicant, JOHN CLIFFORD J. KING and his attorney, Oliver Schrumpf

Oliver Schrempf

OLIVER "JACKSON" SCHRUMPF, Appeal Counsel
Bar Roll No. 11832
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
e-mail: oschrumpf@schrumpf-law.com

CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing Application for Writ of

Review and for Stay has been served on the presiding trial judge and all opposing counsel, by depositing a copy in the U.S. Mail, postage prepaid, properly addressed to all counsel, and to the Third Circuit Court of Appeal, to wit:

Third Circuit Court of Appeal Judges
1000 Main Street
Lake Charles, Louisiana 70615
P.O. Box 16577
Lake Charles, Louisiana 70616
Telephone: 337-433-9403
Fax: 337-491-2590

Ed Bauman
940 Ryan Street
Lake Charles, La. 70601
P.O. Box 1641
Lake Charles, La 70602
Telephone: 337-491-0570
Fax: 337-491-0593

by Hand Delivery

Via e-mail: ed@lakecharlesattorney.com

Counsel for Defendants, Renee Amos and Hartford Fire Insurance Co.

Judge RON RICHARD

ron@lccitycourt.org

Judge, Ward 3/Lake Charles City Court

118 W. Mill Street, 2nd Floor

Lake Charles, La 70601

Telephone: 337-491-1305

Fax: 337-491-8676

Thus done at Sulphur, La. This 20th day of February, 2025.

Oliver

Schrump

OLIVER "JACKSON" SCHRUMPF

MinuteID: **1869063**

STATE OF LOUISIANA, PARISH OF CALCASIEU CITY COURT OF LAKE CHARLES

NOTICE OF JUDGMENT

JOHN CLIFFORD **J KING**

Vs. No.

23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID**# 2937**

You are hereby notified that a:

TO: John Clifford J King

Thru: Attorney Oliver Jackson Schrumpf

3801 Maplewood Drive

SULPHUR, Louisiana

of said Parish Calcasieu

has been filed on

11/19/2024

JUDGMENT

and signed by Judge **Judge Richard**

.on

11/21/2024

in the above numbered **and** entitled cause as **per** certified copy **attached** heret

Witness the HONORABLE JAMIE B. BICE RONALD C. RICHARD, **Judges of said Court,**

this

21

day of

November

2024

май

TRUE COPY

Deputy **Clerk** of

Court

23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD **III**

STATE OF LOUISIANA

I hereby certify that Notice of Judgment was mailed to the **plaintiff, John Clifford** J **King** through attorney Oliver Jackson Schrumpf and to defendant**,** Renee Amos **through** attorney Kamie T. Dominic this **21st** day of November 2024**.**

Маккий

CLERK

Ronald C. Richard

Appendix
Page 1

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JOHN CLIFFORD J KING

:

LAKE CHARLES CITY COURT

VS. NO. 23-2124

:

PARISH OF CALCASIEU

RENEE AMOS
NOTARY PUBLIC

:

STATE OF LOUISIANA

NOTARY ID #29374

FILED:

11-19-2014

JUDGMENT

Maliki

DEPUTY CLERK OF COURT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, and his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing this matter and for reasons orally assigned, entered the following judgment:

IT **IS HEREBY ORDERED**, ADJUDGED **AND** DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT

2024, in Lake Charles, Calcasieu

READ and SIGNED this *21st* day of November *20*

Parish, Louisiana.

RON RICHARD, JUDGE DIVISION B JUDGE, LAKE CHARLES CITY COURT

Ronald C. Richard

Appendix

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2200

11-21-2004

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Suit No. 23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a certified copy of the Motion and Order for Devolutive Appeal signed by Judge Ronald C. Richard has this 3rd day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

CLERK

Appendix

P.3

RECD LC CITY COLAY CU
*24 DEC
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11:35

JOHN CLIFFORD J KING
:
WARD 3/LAKE CHARLES CITY COURT

VERSUS NO. 2023-2124
:
PARISH OF CALCASIEU

RENEE AMOS NOTARY PUBLIC
ID # 29374
:
STATE OF LOUISIANA

FILED:
122-2034
:
DEPUTY CLERK OF COURT

MOTI
MOTION AND ORDER FOR DEVOLUTIVE APPEAL

ON MOTION OF Oliver "Jackson" Schrumpf, counsel *for* John Clifford J King, plaintiff herein, for a devolutive appeal from the judgment rendered November 14, 2024, read and signed November 21, 2024, notice of which was mailed November 21, 2024, and from the judgment ("Ruling") denying plaintiff's claims against Renee Amos.

IT IS ORDERED that a devolutive appeal be and *is* hereby granted to John Clifford J King

and that the appeal be returnable to the Court of Appeal, Third Circuit, State of Louisiana, at

Lake

Charles, Louisiana, upon payment of costs in accordance with law.

SO ORDERED this 3rd day of

Decenatur

Calcasieu Parish, Louisiana.

Decenti

or

2024, in Lake Charles,

Prepared by:

JUDGE RON RICHARD

BY:

Oliver

Schrumpf

OLIVER "JACKSON" SCHRUMPF #11832
SCHRUMPF LAW OFFICE,
A Professional Law

Corporation
3801 Maplewood Drive
Sulphur, Louisiana
70663
(337) 625-9077; Fax (337) 625-8231
oschrumpf@schrumpf-law.com

Ronald C. Richard

12-3-2034

Appendix
P. 4

JOHN CLIFFORD J KING

VS.

RENEE AMOS NOTARY PUBLIC

NOTARY ID# 29374

TO:

NOTICE OF APPEAL
CIVIL CASE

JAMIS Control No.

Case No.
23-2124

Parish of CALCASIEU

State of LOUISIANA

OLIVER SCHRUMPF
SCHRUMPF LAW OFFICE, APLC
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

Division CIVIL

RONALD C. RICHARD
Presiding Judge

REBECCA BERKEN/KAREY BANG Court Reporter

TWO HOURS (2)
Estimated Hours of Testimony Taken

NOTICE is hereby given that on DECEMBER 2, 2024 upon motion of JOHN CLIFFORD J KING, PLAINTIFF (Give appellant's proper name and designate whether he or she is plaintiff, defendant, or intervenor, etc.), an order of appeal was entered on DECEMBER 3, 2024, granting an appeal from judgment of NOVEMBER 14, 2024, returnable to the COURT OF APPEAL, 3rd Circuit, 45 days from when costs. are paid.

The appeal taken
was:

[ ] Suspensive Bond **$**

According to
Law_

[X] Devolutive Bond set at $

[ ] In Forma Pauperis

[ ] Act La. R.S. 13:4521 & 13:4581

I certify that the foregoing notice was this day mailed by me in accordance with Article 2121, La. C.C.P.

LAKE CHARLES, Louisiana, this the___20TH day of DECEMBER, 2024.

Kareen bang

DEPUTY CLERK OF COURT

ATTENTION: Under Article 2126, La. C.C.P., all estimated costs of the appeal must be paid to the Clerk. within 20 days.

EXTENSION OF RETURN DAY GRANTED BY THE TRIAL COURT

The return day was extended
from

Order Signed by

Reason for Extension:

to

Date Signed:

I certify that the foregoing extension notice was this day mailed by me in accordance with Article 2125, La. C.C.P.,

Louisiana, this the

day *of*

DEPUTY CLERK OF COURT

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seated. We have everybody here? All right. All right, uh, in the matter of John Clifford King, Jr., number 2023-2124

MR. SCHRUMPF:

Senior.

THE COURT:

Oh, senior. Sorry. Versus Renee Amos, this matter came to trial today. The Court has heard from all witnesses, uh, all counsel have had the opportunity to present their case and the Court finds as follows. The burden of proof in a matter of this nature rests, of course, on plaintiff to prove by a preponderance of the evidence that indeed what they claim occurred, occurred. And in this matter, the claim was that Ms. Amos failed to, uh, one (1) committed fraud in allowing someone to commit a transfer of title of a vehicle, uh, without the proper party being present. There were some

allegations of forged signature, allegations of negligence, etcetera made. The Court finds, uh, however that the evidence showed as follows. One (1), the Court finds that Mr. King was indeed apparently in New York and New Jersey on September 7th of 2021. That he was

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P-6

indeed not in Lake Charles. His testimony and his wife's testimony, uh, is irrefuted and

undisputed that that's indeed where they were.

The Court finds as a matter of fact that he is

not, uh, Flash from Marvel Heros, and cannot

quickly proceed somehow from that far away from

to Lake Charles, execute a title, execute

a transfer, and then go back. I find basically

that his testimony is the Gospel truth. That

he got up that day. He went and worked out,

got a smoothie, went to his job and, uh, spent

the

evening

apparently

celebrating

the upcoming nuptials with his bride. I find, uh, Mrs. King testified to the same. They got up that day. They were in New York and New Jersey and he was not in Lake Charles. On the other hand, I find that, uh, Ms. Amos' testimony, uh, is also undisputed. Mr. King freely admits he wasn't there. He don't know what happened in her home whenever the transfer of the document ... on the document was, uh, occurred. And her testimony is that she, uh, was contacted; that Ms. Colston and, uh, some man

came, showed IDs. She verified their IDs. She notarized their signatures and that's the

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extent of it. She does not have a truly independent recollection of exactly what

everybody looked like but she testified that it is her custom and practice to require that everyone show her an ID. She verifies it and

if anything is "fishy" in the sense that if

that someone doesn't have an ID or the ID is

uh, doesn't match, OI if there's obviously, uh,

already a signature on a document that she did

not witness, she contacts the Justice of the

Peace regarding the matter. Her testimony. is

this is indeed how

indeed how she's done for, I can't

remember, I think she said twenty (20)

something years. I don't know. A long time.

Not trying to make you older than you are, Ms.

Amos.

MS. AMOS:

Thank you.

THE COURT:

But, she was very, very adamant in

that she does not deviate from her practice.

She does not recall, sitting here today, if it

was Mr. King or not and has no reason to argue that it was ... could indeed have been someone else utilizing a fake ID. The Court

the

Appendix p.8

one (1) missing link that that the Court really needed so that the Court can make a

a decision here is Ms. Colston.

missing link,

a

She's the

to speak. Ms. Colston isn't

here to testify. Seems to me,

she'd of been

the one. You get her in here. You put her on

the stand. Who went with you? Who was there?

What happened? I find it of no moment that a

Notary who does, I think you know, she

testified thousands of these things over the

years, that a Notary who does this doesn't

specifically remember everything about a

particular deal. They just know their

protocol. Ms. Colston, however, this would be

a rather significant and unique event in her

life and, uh, she would be the party who would

be best situated to tell us what in the world

happened that day, who was with her, uh, etcetera. All right? So it's one of those cases where the Court doesn't have to think that a plaintiff is the only one telling the truth, or the defendant is the only one telling the truth, uh, it's one of those one of those cases where the Court can find that I believe everybody's telling the Gospel truth in here today. I think

Appendix
Pq

Mr. King wasn't lying about where he he was. I think Ms. Amos isn't lying about what her protocol is and that two (2) people showed up, a man and a woman. She checked their IDs, uh, and executed the documents. If Ms. Colston was here, I think that's the one we'd have to decide or we'd be calling her the proverbial liar, liar, pants on fire or not, okay? That all having been the case, uh, the Court finds that let me grab the pleadings. The Court finds that the plaintiff has failed to prove by a preponderance evi of the evidence that defendant undertook to provide illegal notarial services to Charmaine Colston, intentionally notarizing a false title transfer and a false bill of sale for the

subjects in this matter. Additionally, the Court finds that plaintiff failed to prove by a preponderance of the evidence

preponderance of the evidence that defendant failed, uh, to exercise whatever professional notarial powers and evaluation ·skill that needed to be done in executing this matter. In short, the Court finds that plaintiff failed to prove by a preponderance of the evidence

Appendix P.1...

that, uh, defendant Amos did anything

incorrect in processing this matter and the Court finds that her explanation of what occurred to be reasonable and that indeed, Ms. Colston's testimony could have swayed the Court one way or the other. That being the case, judgment in favor of defendant. Costs of court awarded to defendant and that is the

judgment in this matter. Ms. Dominic, Dominic, please prepare a judgment and circulate same in this matter. Counsel, any questions?

MR. SCHRUMPF:

No. I just want to make sure all of the offerings were proffered.

THE COURT:

All ali offerings were proffered.

MR. SCHRUMPF:

Whatever wasn't admitted into evidence is proffered.

THE COURT:

Yes. All is proffered. And I and

I'll speak to that quite frankly. All, uh, all documents that were made by proffer that this Court did not allow to be entered into evidence, the Court believes were all moot due

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to the fact that the Court did not feel those documents were necessary to prove that Mr. King was in New York and New Jersey. In fact, Mr. King's testimony and Mrs. King's testimony were more than sufficient to convince the Court that, uh, Mr. King was indeed in New Jersey or New York on September 7th of 2021. Now, do we have any other questions from counsel?

MS. DOMINIC:

Just to, uh, clarify Your Honor. The judgment is in favor of the defendant and, uh, court costs in our favor. Correct?

THE COURT:

Yes.

MS. DOMINIC:

Thank you.

END OF TRIAL

Appendix P./.....

Re: From Judge Ronald C. Richard re: King Contempt of Court

From: True King <truekingfile@gmail.com>

To: Kay Bang <kay.bang@lccitycourt.org>

Cc: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Date: Fri, 22 Nov 2024 10:45:04 -0500

You said she could not call about case # 23-2124 or it would be “practicing law” and previously said if my case number was represented by attorney nothing could be filed or written by myself. Now you’re telling her to call and email about my case when you were contacted no one responded. This is contradictory and incurs more illegitimate fees you filed three services one to an address in Iowa La just to run up court costs? How? I’ve never owned a home in Iowa and she’s never lived there but you’re charging her for service at that address without due process? And she’s not a resident?

What is her case number so she can get info about her separate case and separate fees as it appears you have attached her fees to my case and are adding extra fees sending mail to Iowa LA and Lake Charles LA and Sulphur LA incurring service fees and charging me for them even though Mr Schrumpf me and her attorney from out of state have all made clear you cannot serve her in LA she isn’t a resident and Schrumpf isn’t her attorney .

Please remove all fees related to my wife from my case # so she can have her own counsel enroll. As of now you’re charging me for inadequate service she must be served at her domicile and served to her own attorney and she has not.

Also please assign a new case number to my contempt as a separate attorney is needed for that matter.

She had been advised by her own counsel not to deal with this matter that has proceeded without due process and unsubstantiated allegations as these actions are causing trauma and financial consequences as the flights from last week were $850 dollars and she was ordered to appear without due process no certificate of service but told if she did not appear out of jurisdiction she would be thrown and jail. There was never any hearing on practicing law and the actions caused irreparable harm to her financial position and exposure of her life and safety for placing addresses after she specifically told you there would be life threatening consequences from one of her assailants which could result in another attempted murder on her life.
At this time due to the reckless regard for her life and safety and the lack of civil rights afforded which decimated her financial resources she will be seeking protective orders from the immediate abuses that have caused unnecessary damages and threats to her life and safety.

The appearance date was November 14,2024 she appeared as a courtesy out of her jurisdiction and as a result now fears for her life and my mother must relocate because of your public disclosures of a home address associated with her name. This trauma is irreversible and in her delicate condition will be seeking protections and relief afforded to her and all civil rights protections guaranteed by her jurisdiction.

Murder and sexual assault are not games. Racial hate crimes and being shot for your skin color is not a game and it appears that this isn't about justice anymore this is about other things and I agree to leave it to her own representatives to assign an appropriate title for what is being done to her.

Please remove me and my attorney from any correspondence pertaining to my wife and her safety as Mr Scrumpf has repeatedly told the court he does not represent her and your attaching fees and demanding flights in spite of the clarification and I am formally asking that it be amended on the record.

thank you

On Fri, Nov 22, 2024 at 10:02 AM Kay Bang <kay.bang@lccitycourt.org> wrote:

> Mr. King,
>
>
>
> The Court is in receipt of your email correspondence dated November 21,
> 2024 making inquiries regarding contempt matters concerning your wife, Mrs.
> Shunte King. You are not an attorney and you do not represent her. If
> Mrs. King has any written inquiries to the Court on issues pertaining to
> her contempt matter, she must send them herself.
>
>
>
> Judge Ronald C. Richard
>
> by Kay Bang
>
> <https://www.google.com/maps/search/118+W.+Mill+Street+%0D%0A+Lake+Charles,+LA
+70601?entry=gmail&source=g>
>
>
>
>
>
>
>
>
> Kay Bang
>

> Paralegal
>
> Lake Charles City Court Judges’ Office
>
> 118 W. Mill Street
> <https://www.google.com/maps/search/118+W.+Mill+Street+%0D%0A+Lake+Charles,+LA+70601?entry=gmail&source=g>
>
> Lake Charles, LA
> <https://www.google.com/maps/search/118+W.+Mill+Street+%0D%0A+Lake+Charles,+LA+70601?entry=gmail&source=g>
> 70601
> <https://www.google.com/maps/search/118+W.+Mill+Street+%0D%0A+Lake+Charles,+LA+70601?entry=gmail&source=g>
>
> 337-491-1305 office
>
> 337-491-8676 fax
>
> kay.bang@lccitycourt.org
>
>
>
>
>

RE: From Judge Ronald C. Richard re: King Contempt of Court

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: Kay Bang <kay.bang@lccitycourt.org>, truekingfile@gmail.com

Cc: KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>, Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

Date: Fri, 22 Nov 2024 10:58:54 -0600

I do not represent Mr. King nor Mrs. King regarding any alleged contempt of court matter. My representation was strictly on the claim against Renee Amos. Please remove me from further correspondence on issues of contempt.

Oliver “Jackson” Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

From: Kay Bang <kay.bang@lccitycourt.org>
Sent: Friday, November 22, 2024 9:02 AM
To: truekingfile@gmail.com
Cc: Oliver Schrumpf <oschrumpf@schrumpf-law.com>; KAMIE DOMINIC <kamiedominiclaw@gmail.com>; Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>
Subject: From Judge Ronald C. Richard re: King Contempt of Court

Mr. King,

The Court is in receipt of your email correspondence dated November 21, 2024 making inquiries regarding contempt matters concerning your wife, Mrs. Shunte King. You are not an attorney and you do not represent her. If Mrs. King has any written inquiries to the Court on issues pertaining to her contempt matter, she must send them herself.

Judge Ronald C. Richard

by Kay Bang

Kay Bang

Paralegal

Lake Charles City Court Judges’ Office

118 W. Mill Street

Lake Charles, LA 70601

337-491-1305 office

337-491-8676 fax

kay.bang@lccitycourt.org

From Judge Ronald C. Richard re: King Contempt of Court

From: Kay Bang <kay.bang@lccitycourt.org>

To: "truekingfile@gmail.com" <truekingfile@gmail.com>

Cc: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Date: Fri, 22 Nov 2024 15:01:56 +0000

Mr. King,

The Court is in receipt of your email correspondence dated November 21, 2024 making inquiries regarding contempt matters concerning your wife, Mrs. Shunte King. You are not an attorney and you do not represent her. If Mrs. King has any written inquiries to the Court on issues pertaining to her contempt matter, she must send them herself.

Judge Ronald C. Richard
by Kay Bang

Kay Bang
Paralegal
Lake Charles City Court Judges' Office
118 W. Mill Street
Lake Charles, LA 70601
337-491-1305 office
337-491-8676 fax
kay.bang@lccitycourt.org<mailto:kay.bang@lccitycourt.org>

Suit No.: 23-2124

JOHN CLIFFORD J KING

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Cost Summary	
Deposits:	$1,793.00
Court Cost:	($1,276.70)
Refund:	$0.00
Balance:	$516.30

Date	***Minutes***			
8/24/2023	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS.	***Code:***	AC	***ServType:***
		Deposit:		
		Cost:	$0.00	***ServCost:***
8/24/2023	DEFAULT COURT COST	***Code:***	DCC	***ServType:***
		Deposit:		
		Cost:	$56.50	***ServCost:***
8/24/2023	CLAIM: DAMAGESAS PER FAX FILED PETITION (6PAGES); C/SUPPLEMENTAL REPORT(2); CPSO OFFENSE REPORT(4); CPSO CASE REPORT(4) C/WELD INSPECTION(7); C/SOUTHWEST CREDIT UNION DOCS(2); C/CAPITAL ONE(7); C/REGISTRATION(1); C/VEHICLE APPLICATION(1); CASE REPORT SUMMARY(1); C/CERTIFICATE OF TITLE(2); C/LICENSE(1); C/CASE SUMMARY(1) FILED HEREINPETITION (6PAGES) 1/CC 1/CONFEXHIBITS(33)FAX FILING FEE $5.00	***Code:***	CL	***ServType:***
		Deposit:		
		Cost:	$95.00	***ServCost:***

9/1/2023	CITATION ISSUED (RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 AT 1208 17TH STREET LAKE CHARLES LA, 70601)	***Code:***	CII	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
9/5/2023	ADDED DEPOSIT FROM JOHN KING OF $255.00 ADV DEP	***Code:***	PD	***ServType:***	
		Deposit:	$255.00		
		Cost:		***ServCost:***	
9/5/2023	2 COPIES OF THE PETITION 1 FOR SERVICE, 1 FOR PLT12 PAGES @ $2.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$24.00	***ServCost:***	
9/12/2023	DEFENDANT RENEE AMOS PEREMPTORY EXCEPTIONS OF PRESCRIPTION, RULE TO SHOW CAUSE, C/JUDGMENT OF DISMISSAL WITH PREJUDICE, C/CPSO SUPPLEMENTAL NARRATIVE /INITIAL REPORT, C/CPSO OFFENSE REPORT RECEIPT, AND C/CASE REPORT FILED HEREIN.**ORDER SIGNED BY JUDGE JAMIE B. BICE 9/13/2023**EXCEPTIONRULE1 AT $6 EACH9 AT $2 EACH1 CONFORMED COPY TO ATTY DOMINIC1 CC TO BE SERVED TO PLTF	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$44.00	***ServCost:***	
9/12/2023	ADDED DEPOSIT FROM KAMIE DOMINIC OF $150.00 ADD DEP FOR EXCEPTION	***Code:***	DD	***ServType:***	
		Deposit:	$150.00		
		Cost:		***ServCost:***	
9/20/2023	HEARING NOTICE OF EXCEPTION RULE SET FOR WEDNESDAY 11/15/2023 AT 9:00 AM MAILED TO DEFT ATTY., KAMIE T. DOMINIC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	

9/20/2023	RULE: EXCEPTION DATE: WEDNESDAY 11/15/2023 AT 9:00 AM	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	
9/20/2023	CITATION ORDER ISSUED TO: (KING, JOHN CLIFFORD J AT 123 N. LOUISIANA AVENUE LAKE CHARLES LA 70601) EXCEPTION	***Code:***	CIO	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
11/7/2023	FAX FILED MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/08/23.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
11/13/2023	RECEIVED ORIGINAL MOTION FOR CONTINUANCE AND MOTION TO QUASH AND ORDER FILED HEREIN BY JOHN C J KING, SR, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601; 318-995-1705. ORDER SIGNED BY JUDGE JAMIE B. BICE ON 11/16/23.MOTION/2CCDOCS/2EXHIBITS/6COPIES/18	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$76.00	***ServCost:***	
11/13/2023	CC / JOHN KINGADD DEP / FOR MOTIONS TO CONTINUE AND QUASH	***Code:***	PD	***ServType:***	
		Deposit:	$255.00		
		Cost:		***ServCost:***	
11/28/2023	HEARING NOTICE FOR EXCEPTION SET FOR WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM MAILED TO DEFENDANT, RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC.	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
11/28/2023	NOTICE OF MOTION FOR CONTINUANCE AND MOTION TO QUASH ISSUED TO: RENEE AMOS NOTARY PUBLIC NOTARY ID#29374, THRU ATTORNEY, KAMIE T. DOMINIC AT 1400 RYAN ST., LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00

11/28/2023	RULE REFIXED: EXCEPTIONDATE: WEDNESDAY, JANUARY 17, 2024 AT 9:00 AM	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	
11/28/2023	CITATION ORDER ISSUED TO WITH C/MOTION FOR CONTINUANCE AND MOTION TO QUASH: JOHN CLIFFORD J KING AT 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601	***Code:***	CIO	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/4/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/5/2024	CC / JOHN KINGADD DEP / FOR FAX FILING FEE AND SUBPOENA	***Code:***	PD	***ServType:***	
		Deposit:	$55.00		
		Cost:		***ServCost:***	
1/5/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	***Code:***	SUB	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/16/2024	FAX FILED - MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	RULE: EXCEPTION (RE-FIXED)DATE: THURSDAY, JANUARY 25, 2024 @ 9:00 AM**2 NOTICES MAILED**	***Code:***	RU	***ServType:***	
		Deposit:			
		Cost:	$4.00	***ServCost:***	

1/17/2024	PLTF FAILS TO APPEAR; DEFT APPEARS W/ATTY; MOTION TO CONTINUE GRANTED; CONTINUED UNTIL 1/25/2024 @ 9:00 AM; NOTICE TO BE SENT TO BOTH PARTIES. RCR	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	FAX LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
1/17/2024	EXCEPTION RE-FIXED FOR 1/25/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
1/17/2024	(P) SUBPOENA ISSUED WITH C/LETTER AND C/WITNESS SUBPOENA ACKNOWLEDGEMENT FORM (CHARMAINE Y. COLSTON THRU ATTORNEY, ORELIA LAWDINS TRENT AT 1504 MARTIN LUTHER KING HWY SUITE A LAKE CHARLES LA 70601)	***Code:***	SUB	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
1/19/2024	REQUEST FOR A COPY OF THE EXCEPTIONS FILED HEREIN BY DEF ATTY KAMIE T DOMINIC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
1/19/2024	1 COPY OF DEFENDANT PEREMPTORY EXECEPTIONS OF PRESCRIPTION4 PAGES @ $2.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	

1/19/2024	ADDED DEPOSIT FROM KAMIE T. DONINIC OF $14.00 ADD DEP/CF OF PEREMPTORY EXECEPTIONS	***Code:***	DD	***ServType:***	
		Deposit:	$14.00		
		Cost:		***ServCost:***	
1/22/2024	ADDED DEPOSIT FROM JOHN KING OF $80.00 /SUBPOENA	***Code:***	PD	***ServType:***	
		Deposit:	$80.00		
		Cost:		***ServCost:***	
1/22/2024	RECEIVED ORIGINAL LETTER REQUESTING SUBPOENA AND WITNESS SUBPOENA ACKNOWLEDGEMENT FORM FILED HEREIN BY PLAINTIFF, JOHN KING, IN PROPER PERSON.REQUESTDOC/1EXHIBIT/1	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$14.00	***ServCost:***	
1/23/2024	RECEIVED ORIGINAL MOTION FOR EMERGENCY CONTINUANCE, ORDER, EXHIBIT FAX FILED HEREIN BY PLTF IN PROPER PERSON. CERT OF SERVICE. **SIGNED BY JUDGE ** EXHIBIT ATTACHED (3 PAGES)MOTION/ORDEREXH - 3 PAGES	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$18.00	***ServCost:***	
1/23/2024	LETTER TO CONTEST COURT FEES FOR JANUARY 17, 2024 FILED HEREIN BY PLTF **BUT NOT SIGNED**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
1/24/2024	FAXED LETTER FILED HEREIN BY ATTY ORELIA R. LAWDINS-TRENT INFORMING THE COURT OF THE RECEIVED SERVICE OF A SUBP (ISSUED AT PLTF REQUEST) FOR CHARMAINE Y. COLSTON, AS THEY DO NOT REPRESENT MS. COLSTON IN THIS MATTER & SHE IS NOT A PARTY TO THIS PROCEEDING; SINCE OFFICE IMPROPERLY SERVED, HAS NOT FORWARDED TO MS. COLSTON; ADDITIONALLY CANNOT ASSUME ANY RESPONSIBILITY FOR HER APPEARANCE OR REQUIRE HER PRESENCE AT ANY HEARINGS IN THIS MATTER	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	

1/25/2024	PLTF APPEARS THRU ATTY, DUSTAN ABSHIRE; DEFT APPEARS WITH ATTY, KAMIE DOMINIC; PRE-TRIAL CONFERENCE HELD; DUSTAN ABSHIRE APPEARS TODAY FOR THE LIMITED PURPOSE OF THIS EXCEPTION HEARING; ARGUMENT AND INFORMATION GIVEN; EXCEPTION REQUEST IS OVERRULED; OBJECTION TO RULING NOTED FOR THE RECORD; MATTER SET FOR TRIAL ON THURSDAY, MARCH 21, 2024 AT 9:00 AM; NOTICE GIVEN IN OPEN COURT AND TO BE MAILED. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $7.00	***ServType:*** ***ServCost:***	
2/7/2024	NOTICE OF ANSWER FILED HEREIN BY DEFENDANT RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 ISSUED TO PLTF JOHN KING, 123 N LOUISIANA AVENUE, LAKE CHARLES, LA 70601	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00	***ServType:*** MF3 ***ServCost:***	$30.00	
2/7/2024	ANSWER FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; FAX: 337-426-8763; *CERTIFICATE OF SERVICE*ANSWER (2 PAGES)/1CC	***Code:*** JF ***Deposit:*** ***Cost:*** $13.00	***ServType:*** ***ServCost:***		
2/8/2024	ADDED DEPOSIT FROM KAMIE DOMINIC FOR ANSWER OF $25.00	***Code:*** DD ***Deposit:*** $25.00 ***Cost:***	***ServType:*** ***ServCost:***		
2/23/2024	REQUEST FOR CERTIFIED COPIES RECEIVED BY CHARMAINE COLSTON. **NOTIFIED COST FOR CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00 PLUS REQ. $6.00 TOTAL AMT. REQUIRED - $29.00**	***Code:*** NO ***Deposit:*** ***Cost:*** $0.00	***ServType:*** ***ServCost:***		
2/27/2024	REQUEST FOR CERTIFIED COPIES FILED HEREIN BY CHARMAINE COLSTON.	***Code:*** JF ***Deposit:*** ***Cost:*** $6.00	***ServType:*** ***ServCost:***		

2/27/2024	CERT. COPY OF PETITION (6 PAGES) & COURT MINUTE SHEET (1 PAGE) IS $23.00	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$23.00	***ServCost:***	
2/27/2024	ADDED DEPOSIT FROM CREDIT CARD/CHARMAINE COLSTON FOR CERTIFIED COPIES OF $29.00	***Code:***	TPD	***ServType:***	
		Deposit:	$29.00		
		Cost:		***ServCost:***	
3/7/2024	TRIAL FIXED FOR THURSDAY, MARCH 21, 2024 @ 9:00 AM; 2 NOTICES MAILED.	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	
3/7/2024	FAX FILED - REQUEST FOR SUBPOENA W/ATTACHED WITNESS SUBP. ACKNOWLEDGEMENT FORM FILED HEREIN BY PLTF IN PROPER PERSON. **REQUEST TO SERVE ATTY ORELIA LAWDINS-TRENT C/O HER CLIENT CHARMAINE COLSTON, LAWDINS GALLIEN FIRM, 1504 MARTIN LUTHER KING HWY STE A, LAKE CHARLES, LA 70601**FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO PLAINTIFF KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$7.36	***ServCost:***	
3/7/2024	TRIAL FIXED FOR 3/21/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$7.36	***ServCost:***	

3/11/2024	**PER JUDGE RICHARD - DISREGARD PLTFS REQUEST FOR SUBP TO BE SERVED TO ATTY ORELIA LAWDINS TRENT C/O HER CLIENT CHARMAINE Y. COLSTON - REFER TO ATTY ORELIA LAWDINS-TRENTS LETTER FILED INTO THE RECORD ON 1/24/2024 WHEREIN SHE ADVISED THE COURT SHE IS NOT THE ATTY OF RECORD FOR MS. COLSTON, AS SHE IS NOT A PARTY IN THIS MATTER**	***Code:*** NO ***Deposit:*** ***Cost:*** $0.00	***ServType:*** ***ServCost:***	
3/19/2024	MOTION TO CONTINUE (2 PAGES); ORDER TO REFIX TRIAL FILED HEREIN BY DEFT THRU ATTY KAMIE T. DOMINIC **PLTF OPPOSES**MOTION (2 PAGES)/ORDER/2CC	***Code:*** JF ***Deposit:*** ***Cost:*** $24.00	***ServType:*** ***ServCost:***		
3/19/2024	ADDED DEPOSIT FROM KAMIE TRAMAIN DOMINIC OF $100.00	***Code:*** DD ***Deposit:*** $100.00 ***Cost:***	***ServType:*** ***ServCost:***		
3/21/2024	TRIAL RE-FIXED DATE: WEDNESDAY, MAY 8, 2024 AT 9:00**NOTICE GIVEN IN OPEN COURT***	***Code:*** JF ***Deposit:*** ***Cost:*** $8.00	***ServType:*** ***ServCost:***		
3/21/2024	PLTF APPEARS W/ATTY DUSTAN ABSHIRE; DEFT APPEARS W/ATTYS KAMIE DOMINIC & ED BAUMAN; FTR, OBJECTION TO THE MOTION TO CONTINUE BY PLTF ATTY DUSTAN ABSHIRE, REQUEST DENIED; MOTION TO CONTINUE BY DEFT ATTY KAMIE DOMINIC GRANTED & SIGNED IN OPEN COURT; TRIAL SET FOR WEDNESDAY, MAY 8, 2024 AT 9:00 AM; PLTF ATTY REQUESTS ZOOM COURT FOR MR. KING, REQUEST DENIED; NOTICE GIVEN TO ALL PARTIES IN OPEN COURT. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $5.00	***ServType:*** ***ServCost:***		
3/25/2024	NOTICE OF MOTION & ORDER TO CONTINUE & REFIX TRIAL ISSUED TO: (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00	***ServType:*** MF3 ***ServCost:***	$30.00	

4/25/2024	MOTION TO RECONSIDER DEFENDANT RENEE AMOS PEREMPTORY EXCEPTION OF PRESCRIPTION; MEMORANDUM IN SUPPORT OF MOTION TO RECONSIDER DEFT PEREMPTORY EXCEPTION (3 PAGES); EXH A (2 PAGES) FILED HEREIN BY DEFT THRU ATTY KAMIE DOMINIC.MOTION/MEMO (3 PAGES)/CC1 EXH (2 PAGES)	***Code:*** JF ***Deposit:*** ***Cost:*** $25.00		***ServType:*** ***ServCost:***	
4/25/2024	NOTICE OF MOTION TO RECONSIDER DEFENDANTS PEREMPTORY EXCEPTION OF PRESCRIPTION ISSUED TO (JOHN CLIFFORD J KING THRU ATTY DUSTAN J. ABSHIRE @ 334 KIRBY ST., LAKE CHARLES, LA 70601)	***Code:*** JF ***Deposit:*** ***Cost:*** $10.00		***ServType:*** MF3 ***ServCost:***	$30.00
4/25/2024	ADDED DEPOSIT FROM CREDIT CARD/KAMIE TRAMAIN DOMINIC FOR MOTION TO RECONSIDER DEFT EXCEPTION OF $100.00	***Code:*** DD ***Deposit:*** $100.00 ***Cost:***		***ServType:*** ***ServCost:***	
5/8/2024	PLTF APPEARS W/ATTY JOHN CLIFFORD J. KING; DEFT APPEARS W/ATY KAMIE DOMINIC; COURT GRANTS PLAINTIFF'S ORAL MOTION TO RESET HEARING AND TO AMEND PLEADINGS TO INCLUDE HARTFORD LIFE INSURANCE COMPANY; MATTER RE-FIXED UNTIL THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; NOTICES TO BE SENT TO ALL PARTIES. RCR	***Code:*** JF ***Deposit:*** ***Cost:*** $5.00		***ServType:*** ***ServCost:***	
5/15/2024	TRIAL RE-FIXED FOR THURSDAY, NOVEMBER 14, 2024 @ 9:00 AM; 2 NOTICES MAILED.	***Code:*** JF ***Deposit:*** ***Cost:*** $8.00		***ServType:*** ***ServCost:***	
5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY DUSTAN J. ABSHIRE, 334 KIRBY ST. LAKE CHARLES, LA 70601	***Code:*** PC ***Deposit:*** ***Cost:*** $5.04		***ServType:*** ***ServCost:***	

5/15/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO ATTORNEY KAMIE T. DOMINIC, 1400 RYAN ST. LAKE CHARLES, LA 70601	***Code:***	PC	***ServType:***	
		Deposit:			
		Cost:	$5.04	***ServCost:***	
5/20/2024	FAX FILED - PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTFFAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
5/30/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $5.00	***Code:***	PD	***ServType:***	
		Deposit:	$5.00		
		Cost:		***ServCost:***	
5/31/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT (4 PAGES) FAX FILED HEREIN BY PLTF **UP FOR REVIEW ** DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/4/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF IS REPRESENTED BY COUNSEL; ALL FILINGS MUST BE MADE VIA COUNSEL OF RECORD. CC TO PLTF ATTY DUSTAN ABSHIRE.	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
6/13/2024	SUPPLEMENTING PETITION (2 PAGES); ORDER; AFFIDAVIT AND COVER LETTER FILED HEREINPETITION (2 PAGES)/3CCDOCS/3	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$41.00	***ServCost:***	
6/13/2024	AN ACTION IN THE SUM OF $10,250.00 PLUS LEGAL INTEREST FROM THE DATE OF JUDICIAL DEMAND UNTIL PAID AND ALL COSTS. **AMENDING PARAGRAPH 2 AND ADD DEFENDANT HARTFORD FIRE INSURANCE COMPANY**	***Code:***	AC	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	

6/13/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM OF $300.00 ADD DEP FOR SUPPLEMENTAL PETITION	***Code:***	PD	***ServType:***	
		Deposit:	$300.00		
		Cost:		***ServCost:***	
6/14/2024	CHECK REQUEST ID# 21090 FOR PREPAYMENT SERVICE FEE SUBMITTED TO COMPTROLLER	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (RENEE AMOS THRU ATTY: KAMIE T. DOMINIC AT 1400 RYAN ST. LAKE CHARLES LA, 70601)	***Code:***	CII	***ServType:***	MF3
		Deposit:			
		Cost:	$10.00	***ServCost:***	$30.00
6/14/2024	CITATION ISSUED W/C SUPPLEMENTAL & AMENDING WITH COPY ORIGINAL PETITION (HARTFORD FIRE INSURANCE COMPANY THRU: LOUISIANA SECRETARY OF STATE AT 8585 ARCHIVES AVE BATON ROUGE LA, 70809)**MAILED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE** CK. NO. 038877 ISSUED TO EAST BATON ROUGE PARISH SHERIFFS OFFICE	***Code:***	CII	***ServType:***	SF
		Deposit:			
		Cost:	$10.00	***ServCost:***	$40.40
6/17/2024	PREPAYMENT OF SERVICE FEE. CHECK #038725 PAID TO: SECRETARY OF STATES OFFICE	***Code:***	SF	***ServType:***	
		Deposit:			
		Cost:	$50.00	***ServCost:***	
6/18/2024	MOTION AND ORDER TO WITHDRAW DUSTAN J. ABSHIRE AS COUNSEL OF RECORD FOR PLTF, JOHN CLIFFORD J KING; ORDER SIGNED BY JUDGE RONALD C. RICHARD ON 6/20/2024; COPY OF LETTER W/EMAIL FILED HEREIN BY ATTY DUSTAN J. ABSHIRE. CERT OF SERVICE. COVER LETTER FILED. COPY TO ATTY ABSHIRE. COPY TO PLTF.CVR LTR/MOTION/ORDER/COPY2 EXH	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$25.00	***ServCost:***	

6/20/2024	ADDED DEPOSIT FROM ABSHIRE LAW FIRM, LLC OF $25.00 ADD DEP MOTION& ORDER TO WITHDRAW AS COUNSEL OF RECORD	***Code:***	PD	***ServType:***	
		Deposit:	$25.00		
		Cost:		***ServCost:***	
6/21/2024	TRIAL FIXED FOR 11/14/2024 9:00 AM NOTICE MAILED TO PLTF, JOHN CLIFFORD J KING @ 123 N LOUISIANA AVE, LAKE CHARLES, LA 70601	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/24/2024	COPY OF PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.**THE ORIGINAL THAT WAS FILED 5/31/2024 ATTACHED TO THIS COPY FOR JUDGE RICHARDS REVIEW** DENIED DUE TO NO 3RD PARTY AFFIANT PROVIDED**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
6/27/2024	ORDER SIGNED BY JUDGE RONALD C. RICHARD - PLTFS PAUPER AFFIDAVIT DENIED DUE TO PLTF HAS FAILED TO PROVIDE A THIRD PARTY AFFIANT. CC TO PLTF.ORDER/CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
7/3/2024	ANSWER FILED HEREIN BY DEFENDANT, HARTFORD FIRE INSURANCE COMPANY, THRU ATTY KAMIE T. DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059; CERTIFICATE OF SERVICEANSWER (2 PAGES)	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$8.00	***ServCost:***	
7/3/2024	ADDED DEPOSIT FROM KAMIE DOMINIC OF $25.00 ADD DEP FOR ANSWER	***Code:***	PD	***ServType:***	
		Deposit:	$25.00		
		Cost:		***ServCost:***	
7/3/2024	ADDED DEPOSIT FROM CREDIT CARD/SHUNTE JONES FOR FAX FILE FEE OF $10.00	***Code:***	PD	***ServType:***	
		Deposit:	$10.00		
		Cost:		***ServCost:***	

7/9/2024	SPOKE TO DEFT ATTY KAMIE DOMINIC AND SHE CONFIRMED SHE EMAIL THE ANSWER TO JOHN KING; THEREFORE, IT DID NOT NEED TO BE SERVED	***Code:***	NO	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
7/25/2024	AMENDING & SUPPLEMENTAL MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD FOR PLTF FILED HEREIN BY ATTY DUSTAN J ABSHIRE & SIGNED BY JUDGE RONALD C. RICHARD ON 7/29/2024. CERT OF SERVICE. COVER LETTER FILED. CONF COPY TO ATTY ABSHIRE.CVR LTR/ORDER/COPY**CC MAILED TO PLTF; CC MAILED TO DEFT ATTY**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$15.00	***ServCost:***	
7/25/2024	ADDED DEPOSIT FROM DUSTIN J. ABSHIRE OF $15.00 ADD DEP/ MOTION & ORDER TO WITHDRAW AS COUNSEL OF RECORD	***Code:***	PD	***ServType:***	
		Deposit:	$15.00		
		Cost:		***ServCost:***	
7/30/2024	FAX FILED -PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
8/2/2024	RECEIVED ORIGINAL PAUPER AFFIDAVIT FILED HEREIN BY PLTF IN PROPER PERSON ** UP FOR JUDGE REVIEW**	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$6.00	***ServCost:***	
8/13/2024	ORDER FOR PAUPER AFFIDAVIT SIGNED BY JUDGE RONALD C. RICHARD ON 8/13/2024 ** FROM THIS DATE PLTF WILL BE ALLOWED TO PROCEED IN PAUPER STATUS** NOTIFIED PLTF	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$0.00	***ServCost:***	
10/31/2024	FAX FILED - MOTION FOR CONTINUANCE, MOTION TO QUASH, MOTION TO STRIKE, MOTION TO DISMISS FRIVOLOUS MOTIONS & RESPONSE TO MOTIONS TO STRIKE AND FOR SANCTIONS (3 PAGES); ORDER; AFFIDAVIT FAX FILED HEREIN BY PLTF IN PROPER PERSON.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	

10/31/2024	MOTION IN LIMINE TO EXCLUDE HEARSAY WITNESSES AND EVIDENCE (2 PAGES); ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION (2PGS)/ORDER/2CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$24.00	***ServCost:***	
10/31/2024	MOTION TO STRIKE & MOTION FOR SANCTIONS; ORDER FILED HEREIN BY DEFTS, RENEE AMOS & HARTFORD FIRE INS CO THRU ATTY KAMIE DOMINIC. **SIGNED BY JUDGE RONALD C. RICHARD ON 11/1/2024** CC TO DEFT ATTY.MOTION/ORDER/2CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$22.00	***ServCost:***	
10/31/2024	ANSWER TO AMENDED PETITION FILED HEREIN BY DEFENDANT, RENEE AMOS, THRU ATTY KAMIE T DOMINIC, 1400 RYAN STREET, LAKE CHARLES, LA 70601; PH: 337-393-7059ANSWER/1CC	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$11.00	***ServCost:***	
10/31/2024	NOTICE OF ANSWER TO AMENDED PETITION ISSUED TO (KING, JOHN CLIFFORD J, 123 N. LOUISIANA AVENUE, LAKE CHARLES, LA 70601)	***Code:***	JF	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	
10/31/2024	ADDED DEPOSIT FROM RENEE E OR PATRICK S AMOS OF $350.00 ADD DEP FOR AMENDED ANSWER. MOTION IN LIMINE & MOTION TO STRIKE	***Code:***	DD	***ServType:***	
		Deposit:	$350.00		
		Cost:		***ServCost:***	
11/1/2024	FAX FILED - DEFENDANTS OPPOSITION TO PLAINTIFFS MOTION TO CONTINUE & MOTION TO QUASH (3 PAGES); ORDER FAX FILED HEREIN BY DEFTS THRU ATTY KAMIE DOMINIC. CERT OF SERVICE. COVER LETTER.FAX FILING	***Code:***	CF	***ServType:***	
		Deposit:			
		Cost:	$5.00	***ServCost:***	
11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION IN LIMINE	***Code:***	CIO	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	

11/4/2024	CITATION ORDER ISSUED (JOHN CLIFFORD J KING @ 123 N. LOUISIANA AVE., LAKE CHARLES, LA 70601) MOTION TO STRIKE & FOR SANCTIONS	***Code:***	CIO	***ServType:***	
		Deposit:			
		Cost:	$10.00	***ServCost:***	

University Hospital

150 Bergen Street
Newark, New Jersey 07103-2425

Radiology Order Requisition

Patient Information

Pt Name	Account Number	Sex	Birthday
King, John C.J.		**Male**	**4/17/1986**

Patient Demographics

Address	Phone

ABN Associated with this Order

No ABN is associated with this order.

Encounter Information

	Provider	Department	Dept Phone
7/11/2024 2:00 PM	Adonay Castillo, MD	NEU NEUROLOGY UH	973-972-9107

Provider Information

Ordering User
Castillo, Adonay, MD
PCP
Rosenberg, Rachel K, MD

Authorizing Provider
Hillen, Machteld E, MD

MRI BRAIN WITHOUT CONTRAST [143648374]

Status: **Active**

Electronically signed by: **Castillo, Adonay, MD on 07/11/24 1528**
Ordering user: Castillo, Adonay, MD 07/11/24 1528
Authorized by: Hillen, Machteld E, MD
Indications of use: Seizure, [redacted] traumatic (Age 18-40y)

Screening Form

General Information

Patient Name: King, John C.J.
Date of Birth: 4/17/1986
Sex Assigned at Birth: Male

MRN: 014672314
Home Phone: [redacted]
Mobile: [redacted]

Procedure	Ordering Provider	Authorizing Provider	Appointment Information
MRI BRAIN WITHOUT CONTRAST		Hillen, Machteld E, MD . 973-972-[redacted]	

Screening Form Questions

No questions have been answered for this form.

Order Diagnosis

	ICD-10-CM	ICD-9-CM
Seizure - Primary	R56.9	780.39

Order Information

Priority:
ROUTINE

Allergies as of 7/11/2024

Reviewed on 7/11/2024

No Known Allergies

Medical History

Medical History (continued)

Diagnosis	Date	Comment	Source
Herniated lumbar intervertebral disc		L4-L5	
High blood pressure			

Electronically signed by: Castillo, Adonay, MD — **Lic # < Not on File >** — **NPI: < Not on File >**
Authorized by: Hillen, Machteld E, MD — **Lic # 25MA071[redacted]** — **NPI: 1255362463**

King, John C.J. (MR # 0146[redacted])

University Hospital

150 Bergen Street
Newark, New Jersey 07103-2425

Procedure Order Request

Patient Information

Pt Name	Sex	Birthday
King, John C.J. (0146[redacted])	**Male**	**4/17/1986**

Patient Demographics

Address	Phone	E-mail Address
[redacted]	[redacted] (Home) *Preferred* [redacted] (Mobile)	johncjking86@gmail.com

ABN Associated with this Order

No ABN is associated with this order.

Encounter Information

	Provider	Department	Dept Phone
7/11/2024 2:00 PM	Adonay Castillo, MD	NEU NEUROLOGY UH	973-972-9107

Provider Information

Ordering User	Authorizing Provider
Castillo, Adonay, MD	Hillen, Machteld E, MD

PCP
Rosenberg, Rachel K, MD

[redacted]

Electronically signed by: **Castillo, Adonay, MD on 07/11/24 1528** Status: **Active**
Ordering user: Castillo, Adonay, MD 07/11/24 1528 Authorized by: Hillen, Machteld E, MD
Order comments: Sleep Deprivation, he was instructed to wake up at 3am and stay awake

Order Diagnosis

	ICD-10-CM	ICD-9-CM
Seizure - Primary	R56.9	780.39

Order Information

Priority:
ROUTINE

Electronically signed by: Castillo, Adonay, MD **Lic # < Not on File >** **NPI: < Not on File >**
Authorized by: Hillen, Machteld E, MD **Lic # 25MA0710[redacted]** **NPI: 125536[redacted]**

FW: Emailing: 23-2124 King vs Amos - Cost Bill

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: Jinnifer Marcantel <jleblanc@schrumpf-law.com>

Cc: True King <truekingfile@gmail.com>

Date: Wed, 28 May 2025 14:02:32 -0500

Attachments:
23-2124 King vs Amos - Cost Bill.pdf

-----Original Message-----
From: Monica Abshire <mabshire@lccitycourt.org>
Sent: Wednesday, May 28, 2025 10:54 AM
To: oschrumpf@schrumpf-law.com; Jinnifer LeBlanc <jleblanc@schrumpf-law.com>
Cc: Rebecca Liles <rebeccaliles@lccitycourt.org>
Subject: Emailing: 23-2124 King vs Amos - Cost Bill

Good Morning Mr. Schrumpf -

Please see attached the Cost bill for Costs owing by Mr. King.
Any questions please do not hesitate to call me.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs Amos - Cost Bill

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

May 28, 2025

TO: Oliver "Jackson" Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Email: oschrumpf@schrumpf-law.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5,397.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)

Please remit payment for the amount listed above.

If you have any questions about the named suit above, please call the Accounting Section of Lake Charles City Court at (337) 491-8701, or Civil office at (337)491-1564.

Monica Abshire
Clerk of Court
mabshire@lccitycourt.org

Bond Department
One Hartford Plaza T-14
Hartford, CT 06155

May 11, 2023

VIA EMAIL ONLY

John C. King
123 N. Louisiana Ave.
Lake Charles, LA 70601

Re:		
	Surety:	Hartford Fire Insurance Company ("**Hartford**")
	Principal:	Renee E. Amos
	Obligee:	Louisiana Secretary of State
	Claim No.:	564 S 66413
	Bond No:	43 BSB IB3612 ("**Notary Bond**" or "**Bond**")
	Claimant:	John C. King

Dear Mr. King:

Hartford hereby acknowledges receipt of your e-mailed correspondence of May 8, 2023, in which the following documents in support of your claim against the above-referenced Bond were attached:

(1) Executed Affidavit of Claim dated May 4, 2023,
(2) Calcasieu Parish Sheriff's Office ('**CPSO**') Case Report Summary for Case No. 2021-00123665, reported on October 9, 2021,
(3) Correspondence from the CPSO dated August 4, 2022,
(4) CPSO's Offense Report Receipt for Report No. 21-123665 and received by the Calcasieu Parish February 2, 2022,
(5) CPSO's Supplement Narrative for Case No. 21-123665, not dated,
(6) CPSO's Offense Report Receipt for Case No. 2021-00123665 detailing the list of evidentiary items attached and stamped 'Received' on November 8, 2021,
(7) CPSO's 4-page Case Report for Case No. 2021-00123665, reported by John King on October 9, 2021,
(8) Weld Visual Inspection reports naming John King as the FTC Inspector dated September 7, 2021,
(9) Southwest Louisiana Credit Union Member Authorization forms,
(10) Capital One financial statements for John King's account during the month of September 2021,
(11) Vehicle Title Information for the 2011 Chevy Traverse, VIN 1GNKRJED5BJ220559,
(12) CPSO's Supplement Report for Case No. 2021-00123665, not dated,
(13) CPSO's Case Report Summary for Case No. 2021-00147277, reported December 9, 2021; and,
(14) Order in the matter of John Clifford Joseph King, Sr. VS No.2021-002773, Div. A Charmaine Colston filed August 13, 2021.

As you may be aware, the above-referenced Notary Bond is a statutory Bond. As such, coverage and the procedure for making a claim under the Bond are governed by Title 35, of the Louisiana Revised Statutes. Title 35 § 200 (A) states as follows:

> No action for damages against any notary public duly commissioned in any parish in this state. . . answerable for the damage occasioned by such notary public in the exercise of the functions of a notary public, whether based upon tort, or breach of contract, or otherwise, arising out of an engagement to

> provide notarial services shall be brought unless filed in a court of competent jurisdiction and proper venue within one year from the date of the alleged act, omission, or neglect, or within one year from the date that the alleged act, omission, or neglect is discovered or should have been discovered. . .

Based on the statutory language, action for damages against a notary public must be brought within one year from the date of the alleged act, omission, or neglect, or within one year from the date that the alleged act, omission, or neglect is discovered. The alleged act was reported to have occurred in or around September 2021 and the accompanying police report indicates that you were of the alleged act in or around October 2021.

Based on the above analysis, Hartford hereby respectfully denies John C. King 's claim, as being untimely. If there are additional facts, documentation, information or legal analysis that may alter the conclusions set forth herein, please forward such information to my attention for reconsideration.

Hartford reserves the right to supplement, modify and amend the defenses set forth in this letter based on further factual development or legal analysis. Please note that this letter is not, and shall not be, construed as an admission of liability under the Bond or any applicable law. All rights and defenses, which are or may become available to Hartford or Renee E. Amos, are and shall remain fully and strictly reserved whether mentioned in subsequent communications or not. Subject to this continuing reservation, please direct all future correspondence on this matter to my attention. Please include the Claim Number on all communications.

Sincerely,
Hartford Fire Insurance Company

Celeste Hibler

Celeste Hibler
Bond Claim Department
Phone: (847) 285-9034
Email: Celeste.Hibler@thehartford.com

CH

cc: New Orleans Regional Office, via facsimile
Louisiana Agencies LLC, via facsimile
Renee E. Amos; via mail



Proof I was at work on Sept 7, 2021
Clifford J King

6. KING'S WORK DOCUMENTS

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

☑ STRUCTURAL STEEL ☐ PIPE ☐ CURTAIN WALL ☐ PRECAST

☐ LIGHT GAUGE STEEL ☐ MISC. STEEL

CLIENT: JP Morgan Chase DATE: 09/07/2021

PROJECT: JP Morgan Chase - 270 Park Ave P3 Core and Shell FTC NO.: JPMC118P3

PROJECT LOCATION: 270 Park Avenue, New York, NY 10017 PAGE NO.: 1 OF 3

SHOP LOCATION: 1640 New Market Ave, S. Plainfield, NJ 07080 INSPECTOR: John King

WELDING CONTRACTOR: Banker Steel Company TIME IN: 12:00 pm TIME OUT: 8:30 pm

DESCRIPTION OF INSPECTION:
Monitoring the in process welding and fabrication of: 4082C004, 4082C005

LOCATION OF INSPECTION:
Banker Steel, South Plainfield, NJ Shop 7

REFERENCE DRAWINGS BY / DRAWINGS NO. / DATE / REVISION DATE:
TR.TJ/4082C004/11.16.2020/03.11.2021/R1 NT.MM/4082C005/11.11.2020/03.11.2021/R1

MATERIAL TYPE: A572-Gr 50 CVNA

WELD CHECKLIST	INSPECTION RESULTS	
	Accepted	Rejected
Joint Type: ☐ Fillet ☑ Groove ☐ _____	√	
Welding Process: SAW, FCAW	√	
Electrode: E70T-1C(Lincoln XP70), E71T-1C(HDC, UC71), F7A2-EM12K(L61)	√	
Size of Weld: Various	√	
Final Visual Inspection	*	

Welder 1: B. Thomas Cert. No.: 41054 Expiration: *

Welder 2: C. Dimaggio Cert. No.: 4690 Expiration: *

REMARKS:
Welder #3 C. Candelario 4715*

* See Banker Steel management for WQR expiration dates.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-84
(Rev 01/05/17)

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

4082C004 - bp2684, bp2649 - Welder #2, Welder #3 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

4082C005 - bp2684, bp2649 - Welder #1 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	3 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

NON CONFORMANCES: N/A

Inspections Witnessed: N/A

Final Inspection: N/A

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:** 12:00 pm	**TIME OUT:** 8:30 pm

3091C006 - BP31, BP2372, BP32 - Welder #1, Welder #2 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/18)

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	4 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:** 12:00 pm	**TIME OUT:** 8:30 pm

NON CONFORMANCES: 1A271G04 piping porosity the entire length of weld.

Inspections Witnessed: N/A

Final Inspection: 1A271G04 failed.

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

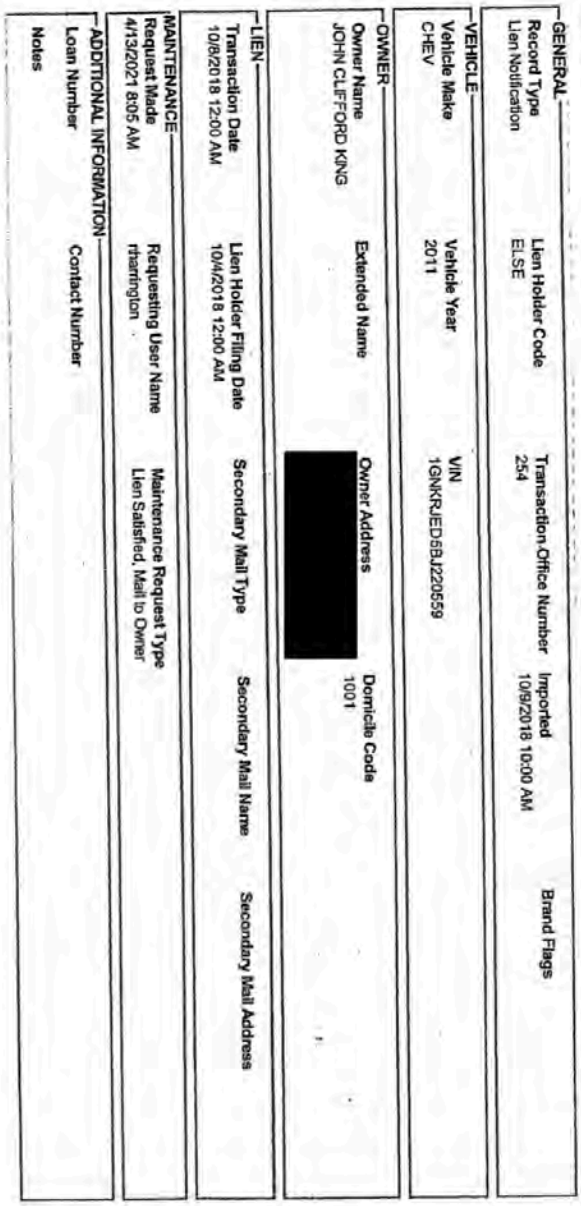
John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/16)

5. Southwest Louisiana Credit Union Documents



Details

GENERAL

Record Type	Lien Holder Code	Transaction Office Number	Imported	Brand Flags
Lien Notification	ELSE	254	10/9/2018 10:00 AM	

VEHICLE

Vehicle Make	Vehicle Year	VIN
CHEV	2011	1GNKRJED5BJ220559

OWNER

Owner Name	Extended Name	Owner Address	Domicile Code
JOHN CLEFFORD KING		[redacted]	1001

LIEN

Transaction Date	Lien Holder Filing Date	Secondary Mail Type	Secondary Mail Name	Secondary Mail Address
10/8/2018 12:00 AM	10/4/2018 12:00 AM			

MAINTENANCE

Request Made	Requesting User Name	Maintenance Request Type
4/13/2021 8:05 AM	rharrington	Lien Satisfied, Mail to Owner

ADDITIONAL INFORMATION

Loan Number	Contact Number

Notes

Credit union she impersonated my spouse was never married

Southwest
LOUISIANA CREDIT UNION

MEMBER TO MEMBER AUTHORIZATION FORM

Print to CDP Manage and Save as an Account Change Card

Member Name: CHARMAINE COLSTON

Member Number: 1000059007

Allow access to transfer to the following:

Member Name	Member Number	Relationship
JOHN KING	1000058944	HUSBAND

I, CHARMAINE COLSTON do hereby authorize Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I understand that any changes must be made by me in person at the Credit Union. I am aware that I'm allowed to make transfers only to other members share accounts and I'm not authorized to make inquiries on these accounts.

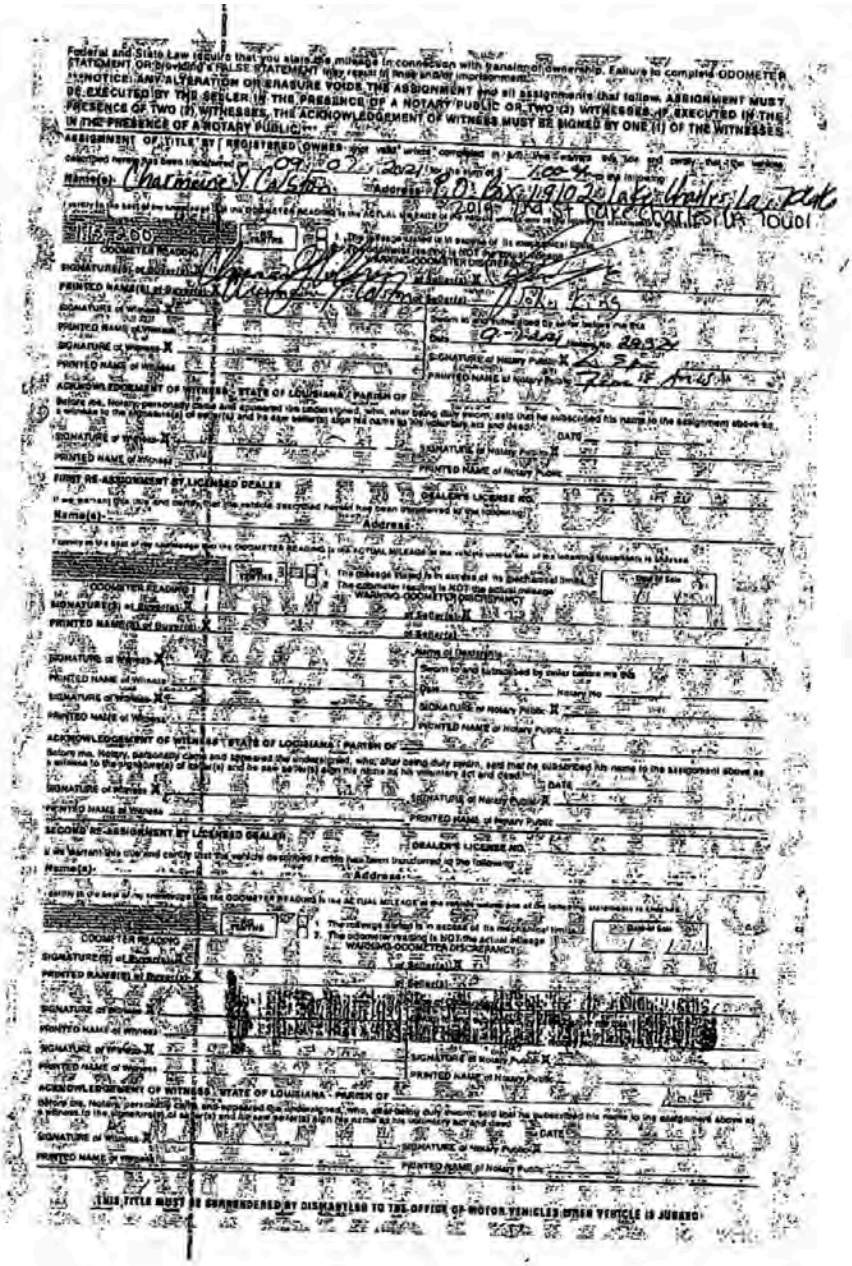
Member Signature [signature] Date: 3/14/17

I, _____ do hereby revoke Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I am aware that by revoking such authorization, I am no longer allowed to make transfers to these members share accounts

Member Signature _____ Date: _____

MSR: AW MSR #: 012

FORGED TITLE IS NOT MY SIGNATURE



Federal and State Law requires that you state the mileage in connection with transfer of ownership. Failure to complete ODOMETER STATEMENT OR providing a FALSE STATEMENT may result in fines and/or imprisonment.

NOTICE: ANY ALTERATION OR ERASURE VOIDS THE ASSIGNMENT

ASSIGNMENT OF TITLE BY [REGISTERED OWNER

Name(s): Charmaine J. Calder

Address: P.O. Box 11902 Lake Charles, La. 70601

2018 Ford F-150 Crew Cab

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

FIRST RE-ASSIGNMENT BY LICENSED DEALER

DEALER'S LICENSE NO.

Name(s):

Address:

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

SECOND RE-ASSIGNMENT BY LICENSED DEALER

DEALER'S LICENSE NO.

Name(s):

Address:

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

THIS TITLE MUST BE SURRENDERED BY DISMANTLER TO THE OFFICE OF MOTOR VEHICLES WHEN VEHICLE IS JUNKED



2019 2nd St
LC 70601

Louisiana Department of Public Safety and Corrections
Office of Motor Vehicles
PO Box 64886
Baton Rouge, LA 70896

APPLICANT'S SIGNATURE (IF REQUIRED)

VALIDATED BY

25U TY/CODE	34EEYM LICENSE PLATE	05/2023 EXPIRATION	1GNKRLED5BJ220569 VIN		10/06/2021 DATE	1001 DOMICILE	
CHEV MAKE	TRV MODEL/WEIGHT	40 BODY	RED/ COLOR	2011 YEAR	113200 ODOMETER	0941 MOS ST/RTE	ICL CITY LIMITS
4 SCD	NOREQ DEALER CODE	0101 CL CLASS	SPEC CODES	PRIV AUTO USE		02/2023 OLD EXP	CITATION DATE
	FLAGS			F1999405 PREVIOUS TITLE	LA STATE	OLD LIC NO	EXP
LI NAU	05/07/2021 DATE ACQUIRED	LPF EPT	CURRENT LA TITLE	TAXABLE VAL MANUF		05/07/2021 TAX DATE	10/06/2021 EFFECTIVE DATE
100.00 SPOV OR VALUE		TRADE VALUE	REBATE	700.00 TAXABLE VALUE			
254 OFFICE NUMBER		REPRINT		HIST			
1750 825 OPERSPID	52 SEQ #	11111111 MICROFILM #		BATCHUSER #			

Use Date

OWNER'S NAME
CHARMAINE Y COLSTON
2019 2ND STREET
LAKE CHARLES LA 70601
NT: 1

TAX & FEE INFORMATION

ST SALES TAX	6.42	LIC FEE	20.00
ST TAX PNLT		TOW FEE	
ST INTEREST		LIC CRDT	
ST TAX CRDT		LIC PNLT	
ST PNLT CRDT		LIC TRANSFER	
ST VNDRS COMP		LIC PNLT CRDT	
NET ST TAX	6.42	NET LIC FEE	20.00
TOURISM	.03	PARISH FEE	
PYM SALES TAX	5.75	MTC FEE	
PYM TAX PNLT		MISC FEE	
PYM INTEREST		SERVICE MNDL	
PYM CRDS TX CRDT		TITLE FEE	68.50
PYM PNLT CRDT		TITLE HOOL	8.00
PYM VNDRS COMP		EXP TITLE FEE	
WHCLCHAIR LIFT		ADMIN FEE	
NET PYM TAX	5.75	S.P. FEE	
TOTAL TAX	10.20	TRUCK ADVISORY	
		TOTAL FEES	96.50
TOTAL: 106.70		REMITTANCE:	

NT: 1

STATUS: MAIL-TO

CHARMAINE Y COLSTON
PO BOX 19102
LAKE CHARLES LA 70616

LOUISIANA OFFICE OF MOTOR VEHICLES
MICROFILMIMAGE COPY

[redacted]

0.00%	$0.00	30
ANNUAL PERCENTAGE YIELD (APY) EARNED	YTD INTEREST AND BONUSES	DAYS IN STATEMENT CYCLE

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 1	Opening Balance			$1.48
Sep 30	Closing Balance			$1.48

Fees Summary

	TOTAL FOR THIS PERIOD	TOTAL YEAR-TO-DATE
Total Fees	$0.00	$0.00

capitalone.com 1-888-464-0727 P.O. Box 60, St. Cloud, MN 56302 MEMBER FDIC

Proof I was at work on Sept 7, 2021
Clifford J King

6. KING'S WORK DOCUMENTS

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

☑ STRUCTURAL STEEL ☐ PIPE ☐ CURTAIN WALL ☐ PRECAST

☐ LIGHT GAUGE STEEL ☐ MISC. STEEL

CLIENT: JP Morgan Chase DATE: 09/07/2021

PROJECT: JP Morgan Chase - 270 Park Ave P3 Core and Shell FTC NO.: JPMC118P3

PROJECT LOCATION: 270 Park Avenue, New York, NY 10017 PAGE NO.: 1 OF 3

SHOP LOCATION: 1640 New Market Ave, S. Plainfield, NJ 07080 INSPECTOR: John King

WELDING CONTRACTOR: Banker Steel Company TIME IN: 12:00 pm TIME OUT: 8:30 pm

DESCRIPTION OF INSPECTION:
Monitoring the in process welding and fabrication of: 4082C004, 4082C005

LOCATION OF INSPECTION:
Banker Steel, South Plainfield, NJ Shop 7

REFERENCE DRAWINGS BY / DRAWINGS NO. / DATE / REVISION DATE:
TR.TJ/4082C004/11.16.2020/03.11.2021/R1 NT.MM/4082C005/11.11.2020/03.11.2021/R1

MATERIAL TYPE: A572-Gr 50 CVNA

WELD CHECKLIST	INSPECTION RESULTS	
	Accepted	Rejected
Joint Type: ☐ Fillet ☑ Groove ☐ _____	√	
Welding Process: SAW, FCAW	√	
Electrode: E70T-1C(Lincoln XP70), E71T-1C(HDC, UC71), F7A2-EM12K(L61)	√	
Size of Weld: Various	√	
Final Visual Inspection	*	

Welder 1: B. Thomas Cert. No.: 41054 Expiration: *

Welder 2: C. Dimaggio Cert. No.: 4690 Expiration: *

REMARKS:
Welder #3 C. Candelario 4715*

* See Banker Steel management for WQR expiration dates.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-84
(Rev 01/05/17)

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

4082C004 - bp2684, bp2649 - Welder #2, Welder #3 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

4082C005 - bp2684, bp2649 - Welder #1 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	3 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

NON CONFORMANCES: N/A

Inspections Witnessed: N/A

Final Inspection: N/A

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:** 12:00 pm	**TIME OUT:** 8:30 pm

3091C006 - BP31, BP2372, BP32 - Welder #1, Welder #2 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/18)

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	4 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:** 12:00 pm	**TIME OUT:** 8:30 pm

NON CONFORMANCES: 1A271G04 piping porosity the entire length of weld.

Inspections Witnessed: N/A

Final Inspection: 1A271G04 failed.

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

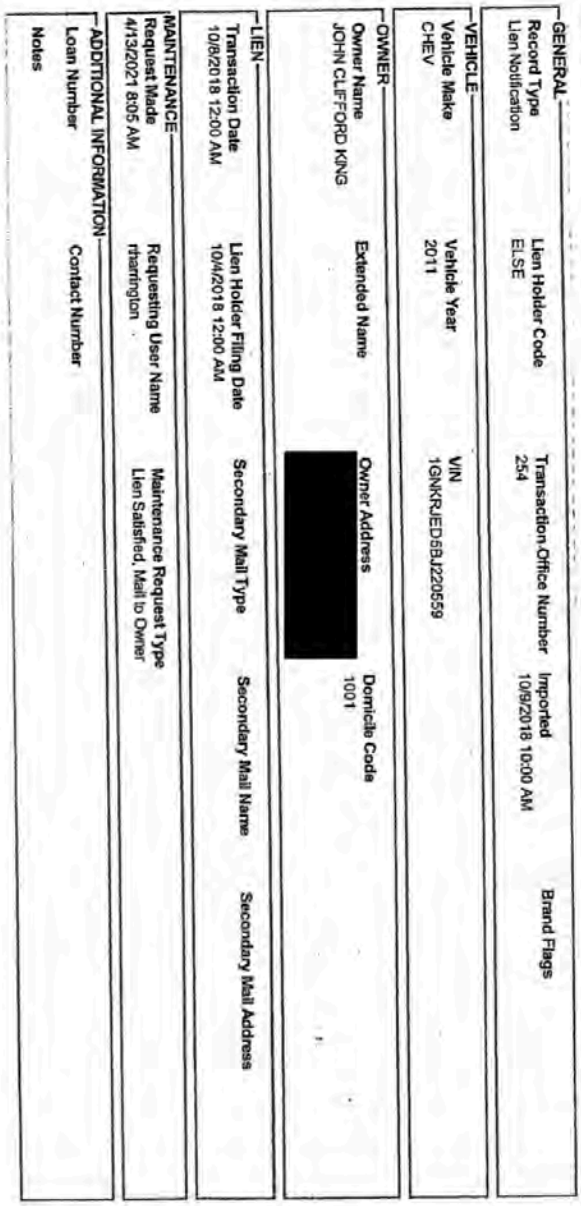
John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-57
(Rev 10/11/16)

5. Southwest Louisiana Credit Union Documents



Details

GENERAL

Record Type	Lien Holder Code	Transaction Office Number	Imported	Brand Flags
Lien Notification	ELSE	254	10/9/2018 10:00 AM	

VEHICLE

Vehicle Make	Vehicle Year	VIN
CHEV	2011	1GNKRJED5BJ220559

OWNER

Owner Name	Extended Name	Owner Address	Domicile Code
JOHN CLEFFORD KING		[redacted]	1001

LIEN

Transaction Date	Lien Holder Filing Date	Secondary Mail Type	Secondary Mail Name	Secondary Mail Address
10/8/2018 12:00 AM	10/4/2018 12:00 AM			

MAINTENANCE

Request Made	Requesting User Name	Maintenance Request Type
4/13/2021 8:05 AM	rharrington	Lien Satisfied, Mail to Owner

ADDITIONAL INFORMATION

Loan Number	Contact Number

Notes

Credit union she impersonated my spouse was never married

Southwest
LOUISIANA CREDIT UNION

MEMBER TO MEMBER AUTHORIZATION FORM

Print to CDP Manage and Save as an Account Change Card

Member Name: CHARMAINE COLSTON

Member Number: 1000059007

Allow access to transfer to the following:

Member Name	Member Number	Relationship
JOHN KING	1000058944	HUSBAND

I, CHARMAINE COLSTON do hereby authorize Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I understand that any changes must be made by me in person at the Credit Union. I am aware that I'm allowed to make transfers only to other members share accounts and I'm not authorized to make inquiries on these accounts.

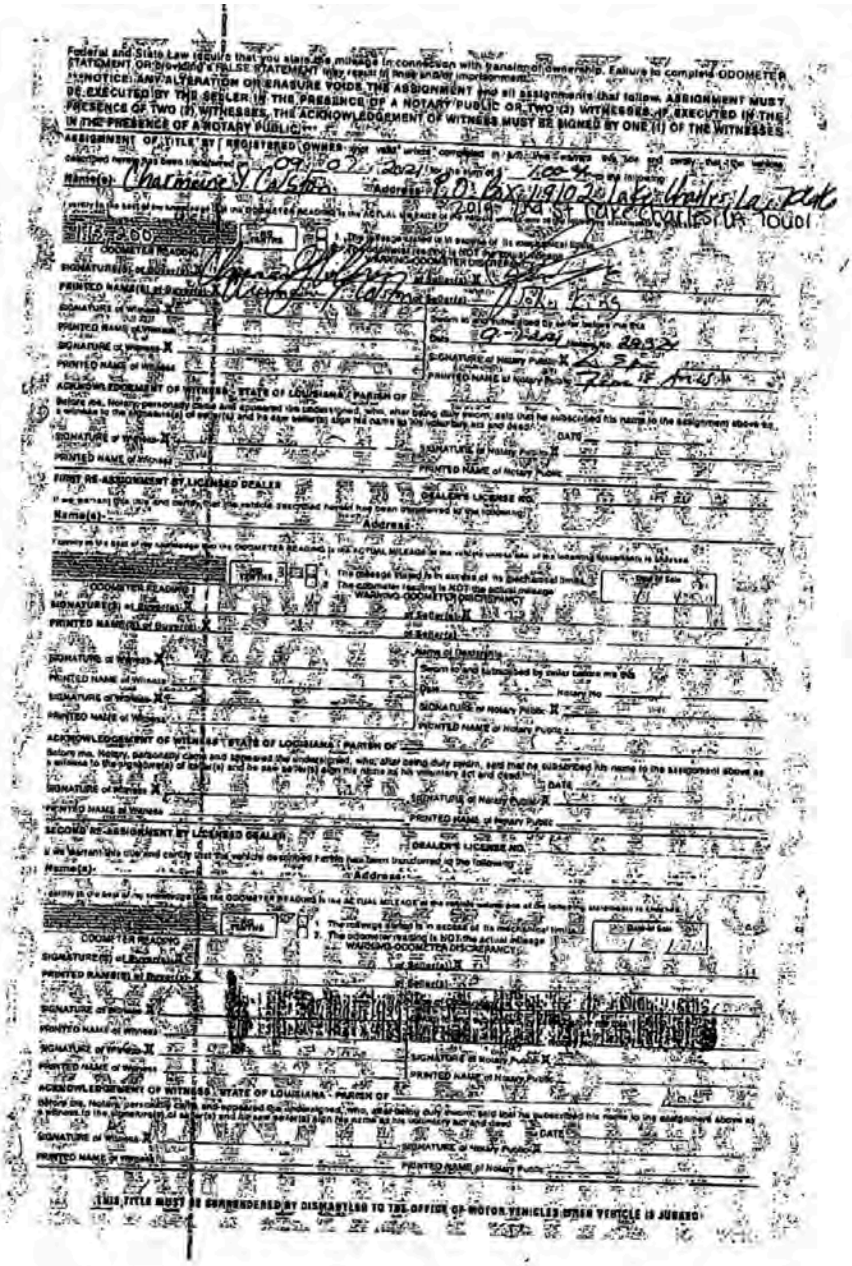
Member Signature [signature] Date: 3/14/17

I, _____ do hereby revoke Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I am aware that by revoking such authorization, I am no longer allowed to make transfers to these members share accounts

Member Signature _____ Date: _____

MSR: AW MSR #: 012

FORGED TITLE IS NOT MY SIGNATURE



Federal and State Law requires that you state the mileage in connection with transfer of ownership. Failure to complete ODOMETER STATEMENT OR providing a FALSE STATEMENT may result in fines and/or imprisonment.

NOTICE: ANY ALTERATION OR ERASURE VOIDS THE ASSIGNMENT

ASSIGNMENT OF TITLE BY [REGISTERED OWNER

Name(s): Charmaine J. Calder

Address: P.O. Box 11902 Lake Charles, La. 70601

2018 Ford F-150 Crew Cab

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

FIRST RE-ASSIGNMENT BY LICENSED DEALER

DEALER'S LICENSE NO.

Name(s):

Address:

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

SECOND RE-ASSIGNMENT BY LICENSED DEALER

DEALER'S LICENSE NO.

Name(s):

Address:

ODOMETER READING

SIGNATURE(S) of Buyer(s)

PRINTED NAME(S) of Buyer(s)

SIGNATURE of Witness

PRINTED NAME of Witness

SIGNATURE of Witness

PRINTED NAME of Witness

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA - PARISH OF

SIGNATURE of Witness

PRINTED NAME of Witness

THIS TITLE MUST BE SURRENDERED BY DISMANTLER TO THE OFFICE OF MOTOR VEHICLES WHEN VEHICLE IS JUNKED



2019 2nd St
LC 70601

Louisiana Department of Public Safety and Corrections
Office of Motor Vehicles
PO Box 64886
Baton Rouge, LA 70896

APPLICANT'S SIGNATURE (IF REQUIRED)

VALIDATED BY

25U TY/CODE	34EEYM LICENSE PLATE	05/2023 EXPIRATION	1GNKRLED5BJ220569 VIN		10/06/2021 DATE	1001 DOMICILE	
CHEV MAKE	TRV MODEL/WEIGHT	40 BODY	RED/ COLOR	2011 YEAR	113200 ODOMETER	0941 MOS ST/RTE	ICL CITY LIMITS
4 SCD	NOREQ DEALER CODE	0101 CL CLASS	SPEC CODES	PRIV AUTO USE		02/2023 OLD EXP	CITATION DATE
	FLAGS			F1999405 PREVIOUS TITLE	LA STATE	OLD LIC NO	EXP
LI NAU	05/07/2021 DATE ACQUIRED	LPF EPT	CURRENT LA TITLE	TAXABLE VAL MANUF		05/07/2021 TAX DATE	10/06/2021 EFFECTIVE DATE
100.00 SPOV OR VALUE		TRADE VALUE	REBATE	700.00 TAXABLE VALUE			
254 OFFICE NUMBER		REPRINT		HIST			
1750 825 OPERSPID	52 SEQ #	11111111 MICROFILM #		BATCHUSER #			

Use Date

OWNER'S NAME
CHARMAINE Y COLSTON
2019 2ND STREET
LAKE CHARLES LA 70601
NT: 1

TAX & FEE INFORMATION

ST SALES TAX	6.42	LIC FEE	20.00
ST TAX PNLT		TOW FEE	
ST INTEREST		LIC CRDT	
ST TAX CRDT		LIC PNLT	
ST PNLT CRDT		LIC TRANSFER	
ST VNDRS COMP		LIC PNLT CRDT	
NET ST TAX	6.42	NET LIC FEE	20.00
TOURISM	.03	PARISH FEE	
PYM SALES TAX	5.75	MTC FEE	
PYM TAX PNLT		MISC FEE	
PYM INTEREST		SERVICE MNDL	
PYM CRDS TX CRDT		TITLE FEE	68.50
PYM PNLT CRDT		TITLE HOOL	8.00
PYM VNDRS COMP		EXP TITLE FEE	
WHCLCHAIR LIFT		ADMIN FEE	
NET PYM TAX	5.75	S.P. FEE	
TOTAL TAX	10.20	TRUCK ADVISORY	
		TOTAL FEES	96.50
TOTAL: 106.70		REMITTANCE:	

NT: 1

STATUS: MAIL-TO

CHARMAINE Y COLSTON
PO BOX 19102
LAKE CHARLES LA 70616

LOUISIANA OFFICE OF MOTOR VEHICLES
MICROFILMIMAGE COPY

[redacted]

0.00%	$0.00	30
ANNUAL PERCENTAGE YIELD (APY) EARNED	YTD INTEREST AND BONUSES	DAYS IN STATEMENT CYCLE

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 1	Opening Balance			$1.48
Sep 30	Closing Balance			$1.48

Fees Summary

	TOTAL FOR THIS PERIOD	TOTAL YEAR-TO-DATE
Total Fees	$0.00	$0.00

capitalone.com 1-888-464-0727 P.O. Box 60, St. Cloud, MN 56302 MEMBER FDIC

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

May 28, 2025

TO: Oliver "Jackson" Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Email: oschrumpf@schrumpf-law.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5,397.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)

Please remit payment for the amount listed above.

If you have any questions about the named suit above, please call the Accounting Section of Lake Charles City Court at (337) 491-8701, or Civil office at (337)491-1564.

Monica Abshire
Clerk of Court
mabshire@lccitycourt.org

John C. King vs Rene Amos

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: True King <truekingfile@gmail.com>

Cc: Dawn Brown <dbrown@schrumpf-law.com>, Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

Date: Fri, 08 Nov 2024 09:36:03 -0600

Mr. John C. King:

`This will confirm that we had a lengthy telephone conversation this morning. This will confirm that I advised you that the judge denied the motion for continuance but he said IF you supply a letter from a doctor explaining the reasons you cannot travel to court in Louisiana, he will allow you to testify via ZOOM.

1. Please attempt to get the treating physician to execute a letter SIGNED BY A PHYSICIAN BY MONDAY NOVEMBER 11 (A court holiday - so we should try to get it today (Friday Nov. 8, 2024, if possible) THE LETTER FROM THE PHYSICIAN NEEDS TO SAY THAT HE or SHE IS TREATING MR. JOHN C. KING, WHAT MR.KING'S CONDITION IS, AND THAT MR. KING IS medically PROHIBITED FROM TRAVELLING from New Jersey to Louisiana until (Date) BECAUSE OF SEVERE RISK OF PERMANENT INJURY (OR WHATEVER OTHER REASON THE DOCTOR HAS FOR PROHIBITING TRAVEL FROM NEW JERSEY TO LOUISIANA). IT MUST BE SIGNED BY THE DOCTOR AND DATED. IT MUST BE RECEIVED BY ME SO I CAN GET IT TO THE JUDGE FIRST THING TUESDAY MORNING or sooner.

2. Please advise if Shunte King will plan to be here Thursday November 14 for trial. I advised that Judge Richard may want to hold a contempt hearing based upon claims she made in various filings with the court claiming misconduct on the part of the judge and his staff) and Judge Richard said he may charge Shunte King with Practicing law without a license based upon filings she made in this case on your behalf. I advised her she should contact the Johnson Law firm 1419 Ryan St, Lake Charles, LA 70601; *Phone: *(337) 282-8556 <https://www.google.com/search?q=Johnson+law+firm%2C+Lake+Charles&rlz=1C1CHBF_enUS897US898&oq=Johnson+law+firm%2C+Lake+Charles&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTINCAEQLhivARjHARiABDIKCAIQABiABBiiBDIKCAMQABiiBBiJBTIKCAQQABiABBiiBDIKCAUQABiiBBiJBdIBCTc5MzZqMGoxNagCCLACAQ&sourceid=chrome&ie=UTF-8>; or Todd Clemons 1740 Ryan St, Lake Charles, LA 70601

*Phone: *(337) 477-0000 <https://www.google.com/search?q=todd+clemons+attorney+lake+charles&sca_esv=fc2e42ae252a1d83&rlz=1C1CHBF_enUS897US898&ei=PywuZ5bROo20ptQPsJibiQI&oq=Todd+Clemons%2C+Lake+Charles&gs_lp=Egxnd3Mtd2l6LXNlcnAiGlRvZGQgQ2xlbW9ucywgTGFrZSBDaGFybGVzKgIIATILEC4YgAQYxwEYrwEyBhAAGAgYHjICECYyCBAAGIAEGKIEMggQABiABBiiBDIIEAAYgAQYogRI0URQhwZY1i9wAXgBkAEAmAGSAaAB2QyqAQQ0LjExuAEByAEA-AEBmAINoAKUCsICChAAGLADGNYEGEfCAgYQABgHGB7CAggQABgHGAgYHsICDRAuGIAEGMcBGA0YrwHCAggQABgIGA0YHp

gDAIgGAZAGCJIHAzQuOaAHw1A&sclient=gws-wiz-serp>
if she wants to obtain representation at this hearing.

3. Please advise what accommodations you have to testify via ZOOM if we can get the doctor's letter in time.

4. Please make certain I have all of the following evidence :

a. A legible copy of the vehicle transfer (showing the date the document was notarized)

b. All available proof to show that John C. King was in New Jersey on the date the transfer was notarized

(Please share this with me via e-mail as soon as possible)

I believe this evidence would be sufficient
to prove that John King did not appear to perform the transfer of title.

Oliver "Jackson" Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

JAMIE B. BICE, JUDGE
RONALD C. RICHARD, JUDGE

OFFICE: 337-491-1305
FAX: 337-491-8676

CIVIL SECTION: 337-491-1564
CIVIL FAX: 337-491-1303

VIOLATION BUREAU: 337-491-1565
VIOLATION FAX: 337-491-8745

LAKE CHARLES CITY COURT
WARD 3 CALCASIEU PARISH

P.O. Box 1664/118 West Mill Street
Lake Charles, LA 70602-1664/70601-4217
www.lccitycourt.org

November 14, 2025

Mr. John Clifford King, Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601
Via CMRRR and email truekingfile@gmail.com

Re: Civil Action No. 23-2124; John Clifford King v Renee Amos

Dear Mr. King:

Our Clerk of Court has notified me of two fax filings you recently submitted in the above-referenced matter. Please be advised that those filings have been time-stamped but not filed into the record because once an appellate decision becomes final under La. C.C.P. art. 2166 and 2167 (as is the case in the above-referenced matter), the judgment acquires *res judicata* effect which bars further litigation of issues that have already been adjudicated. Simply stated, *res judicata* means that an issue that has been definitively settled by judicial decision. The essential elements of *res judicata* are (1) an earlier decision on the issue, (2) a final judgment on the merits, and (3) the involvement of the same parties, or parties in privity with the original parties. *Black's Law Dictionary,* 12th edition.

La. C.C.P. art. 2166 provides that "the judgment of a court of appeal becomes final and definitive if neither an application to the court of appeal for rehearing nor an application to the supreme court for a writ of certiorari is timely filed." La. C.C.P. art. 2166. Our records do not reflect that you filed an application for rehearing with the Third Circuit Court of Appeal following its judgment entered on May 21, 2025. Likewise, La. C.C.P. art. 2167 states that "a judgment of the supreme court becomes final and definitive when the delay for application for rehearing has expired and no timely application therefor has been made."

Additionally, La. R.S. Section 13:4231 codifies the *res judicata* doctrine, providing that "a valid and final judgment is conclusive between the same parties, except on appeal or other direct review." This means that once an appellate judgment becomes final and definitive, any subsequent proceedings in the trial court must be authorized by the remand instructions or must fall outside the scope of the issues already decided. As no such authorization exists here, and this matter has been closed at Lake Charles City Court, the two faxed documents you submitted are being **returned** to you. Finally, any future filings in a matter that has been fully adjudicated and after

all appeals have been exhausted may subject the filer to sanctions, including contempt of court. La. C.C.P. art. 224.

With regard to the cost bill sent to you on May 28, 2025 and again on July 10, 2025, please be aware that La. C.C.P. art. 5186 and 5188 establish that indigent parties (pauper status) who do not prevail on the merits of a case are still responsible to pay costs as cast. More specifically, La. C.C.P. art. 5186(c) states that when an indigent party loses, costs become due. Enclosed is an updated Cost Bill for your review. This updated Cost Bill reflects the Third Circuit ruling of May 21, 2025 and has been adjusted as a result. If you have any questions about the cost bill, please call Monica Abshire at 337-491-1564.

Sincerely,

Jamie B. Bice
Chief Judge, Lake Charles City Court

JBB/kb

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

November 17, 2025
UPDATED

TO: John Clifford J. King
123 N. Louisiana Ave
Lake Charles, LA 70601
Email: truekingfile@gmail.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5397.36 minus Credit $105.00 = New Balance of $5292.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)
Subject to Credit:	$105.00

Please remit payment to Lake Charles City Court for the amount listed above.
Credit cards are assessed an online transaction fee

If you have any questions about the named suit above, please call the Civil office at (337)491-1564.

Monica Abshire
Clerk of Court

FAX COVER SHEET

TO	Lake Charles City Fax
COMPANY	lake charles city court
FAX NUMBER	13374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 18:52:44
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is SUPPLEMENTAL FAX attached to earlier fax dated for today 11/13/2025

Notice of Lack of Jurisdiction and Divestiture Confirmation

Plaintiff submits this Notice to confirm that the Court was divested of jurisdiction on December 3 2024 upon the granting of a devolutive appeal pursuant to Louisiana Code of Civil Procedure article 2088. From that date forward the Court lacked authority to issue orders conduct hearings impose costs generate service attempts rescind pauper status or issue contempt citations. All actions taken after divestiture are void ab initio.

The Court nevertheless conducted hearings on December 18 and December 30 2024 generating additional costs service returns and contempt related entries. These actions were taken without authority and are null. Plaintiff submits this Notice to ensure that no post divestiture fees orders or actions are enforced now or in the future.

ELECTRONIC

FILE DATE: 11-13-2025

Emergency Notice of Prohibited Fee Enforcement

Plaintiff submits this Emergency Notice to preserve all rights before expiration of the statutory period and to document ongoing prohibited enforcement attempts. Plaintiff contacted the Clerk of Lake Charles City Court on this date to request removal of fees and costs that were entered after the Court was divested of jurisdiction on December 3 2024. The Clerk refused and stated that Judge Ronald C Richard is demanding that Plaintiff pay these fees.

All fees assessed after December 3 2024 are void under Louisiana Code of Civil Procedure article 2088. The Court lacked authority to issue orders hold hearings generate service returns or impose costs. Plaintiff has never provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and any fees based on those returns are fraudulent and unenforceable.

The Clerk refusal to remove void fees and the judge ongoing demand for payment constitute retaliation intimidation and abuse of authority. Plaintiff submits this Notice to ensure the record reflects that Plaintiff has objected to all post divestiture fees and that any attempt to enforce them now or in the future is unlawful and constitutes retaliation under state and federal law.

Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

ELECTRONIC

FILE DATE: 11-13-2025

Notice of Correction of False Addresses and Appellate Misrepresentations

Plaintiff submits this Notice to correct multiple inaccuracies and fabricated statements that appear in the record. Plaintiff has never lived in or provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and all fees assessed for service at that location were created without factual basis and must be removed immediately.

Additionally statements made by attorney Mr Bauman regarding the location of a homicide are false. The incident referenced in the appellate filings occurred in Houston Texas not Iowa Louisiana. The claim that Plaintiff spouse called helicopters is also false and unsupported. These misrepresentations distorted the appellate record and contributed to inflated court costs and retaliatory actions taken by the Court.

Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

ELECTRONIC

FILE DATE: 11-13-2025

Monica Abshire

From: Monica Abshire
Sent: Friday, November 14, 2025 7:36 AM
To: truekingfile@gmail.com
Subject: Emailing: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax
Attachments: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax.pdf

Please see attached the Affidavit of Transmission on Supplemental Fax to 11/13/2025 filings.

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King v Amos - Affidavit of Transmission - Supp. Fax

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Affidavit of Transmission

Attention: John C King Sr Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C King Sr vs Renee Amos – 4 pages received – Notice of Lack of Jurisdiction and Divestiture Confirmation; Emergency Notice of Prohibited Fee Enforcement; Notice of Correction of False Addresses and Appellate Misrepresentations

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

FAX COVER SHEET

TO	Clerk Abshire
COMPANY	
FAX NUMBER	3374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 12:40:05
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is a fax

23-2124 COVER LETTER

TO CLERK OF COURT

LAKE CHARLES CITY COURT WARD THREE

Please file the enclosed Motion Proposed Order and Certificate of Service in Case Number 23 2124 King versus Amos.

Respectfully

John C King Sr

Combined Motion to Vacate Divested Orders

NO 23 2124

CITY COURT OF LAKE CHARLES

WARD THREE

CALCASIEU PARISH LOUISIANA

JOHN C KING SR

Plaintiff

versus

RENEE AMOS AND THE HARTFORD

Defendants

Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard

Plaintiff John C King Sr submits this motion to preserve all rights before the statutory deadline. Plaintiff requests that the Court vacate all actions taken after divestiture of jurisdiction remove all improper and retaliatory costs strike all contempt related actions seal identifying information and recuse Judge Ronald C Richard due to bias hostility and misconduct.

Background

Plaintiff is the sole plaintiff in this matter. His spouse S J K has never been a party to this case. Judge Richard nevertheless ordered her to appear in court without jurisdiction service or lawful authority. She is a non resident and a protected crime victim.

Summary of Misconduct

Judge Richard did the following

Accused spouse of practicing law without basis.

Forced a non resident non party to appear under threat.

Threatened to send the District Attorney across state lines.

Denied Plaintiff and spouse access to legal counsel.

ELECTRONIC

FILE DATE: 11-13-2025

Forced disabled spouse to remain without medical accommodation.

Ordered courtroom doors locked during the November 2024 hearing.

Read spouse private address into the public record.

Created circumstances leading to a December 11 2024 intruder incident in Houston Texas.

Lost jurisdiction on December 3 2024 under article 2088.

Held hearings on December 18 and December 30 after divestiture.

Rescinded pauper status without a contradictory hearing.

Created fabricated Iowa Louisiana service addresses and false fees.

Issued retaliatory contempt without cause or notice.

Allowed false appellate statements by Mr Bauman including a false claim the homicide occurred in Iowa Louisiana.

Ignored that neither of Plaintiff parents ever lived in Iowa Louisiana.

Legal Basis

Orders after December 3 2024 are null under article 2088.

Recusal required under article 151.

Constitutional violations include amendments One Four and Fourteen.

Misconduct violates Louisiana Revised Statutes 14 134 14 118 14 122.

Disability protections under ADA Title Two were violated.

Victim protections under Louisiana and federal law were violated.

Relief Requested

Recusal of Judge Ronald C Richard.

Vacatur of all orders rulings costs and contempt actions after December 3 2024.

Removal of all fabricated service fees linked to Iowa Louisiana addresses.

Sealing of any document that contains Plaintiff or spouse identifying information.

Reassignment to an impartial judge.

Any further relief necessary to protect Plaintiff from retaliation.

Respectfully submitted

John C King Sr

123 N Louisiana Avenue

Lake Charles Louisiana 70601

Certificate of Service

I certify that a copy of this motion was served on all parties by email on this date.

Signed John C King Sr

23-2124 CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I certify that the Combined Motion Proposed Order and Cover Letter were served via email on all parties on November 13 2025.

Signed

Verified by pdfFiller
11/13/2025

John C King Sr

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

ACTS FAX

ACTS FAX **ACTS FAX ACTS** FAX **ACTS** FAX

ACTS FAX

DATE:

02/06/2025

From:

Heather Goleman, Deputy Clerk

(337) 433-9403

SUBJECT: **Louisiana** 3rd **Circuit Case** No. **CW** 25 **00044**

Lower Court Case No.: 2023-2124

Calcasieu

Fourteenth Judicial **District** C

To:

JOHN CLIFFORD J. KING VERSUS

RENEE AMOS NOTARY **PUBLIC**

ID #29374 **AND HARTFORD**

FIRE **INSURANCE** COMPANY

Hon. Ronald C. Richard Attorney at Law
330 Alamo Street
Lake Charles, LA 70601 Fax No.
(337) 494-1793 Work No. (337)
494-1900

Oliver Jackson Schrumpf Schrumpf &
Schrumpf 3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

LZS-1 8000/10ood L6Z-1

0697-161-*L88*

01001 PAY MORE 90:60 92-90-20

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson
Schrumpf

Edward Kelly Bauman

Counsel for:
John Clifford J. King

Counsel for:
Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider... motions [regarding pauper status]" Mason v. *Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v.* Ferrington, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of *the* order of appeal, the trial court does not have jurisdiction to hear *the* pro se motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

LZ8-1 8000/2000d 163-1

0692-167-188

o PAY WOUD 90:60 92-90-20

SIZ SJG

JWP

Affidavit of Transmission

Attention: John C. King Sr

Fax No. 508-524-2132

Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C. King Sr vs. Renee Amos – 12 pages received – Combined Motion to Vacate Divested Orders

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Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

Monica Abshire

From: Monica Abshire
Sent: Thursday, November 13, 2025 4:01 PM
To: True King
Subject: Emailing: 23-2124 King vs Amos - Affidavit of Transmission
Attachments: 23-2124 King vs Amos - Affidavit of Transmission.pdf

Please see attached the Affidavit of Transmission.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs Amos - Affidavit of Transmission

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

Person Name: JONES, LANICIA SHUNTE
, Category: VICTIM, Date Birth: 02/26/1984, Age Min: [redacted] Age Max: 0
, Sex: F, Race: B, Ethnicity: , Height: 505, Weight: 155, License State: TX, License_Number:
[redacted]
Business Name:

Tag: TX K90THP PC [redacted] VIN: [redacted]
Make: STRN Model: Year: [redacted] Color: PLE
Business: BEATY, CALVIN R & SHANNON D
Name: ,
Comments: TOMBALL COLLISION // FEB/03//5703 HEATHERBLOOM DR,HOUSTON,TX 77085

Complaint Type: ASSAULT - ASSAULT
Caller Name: [redacted]
Officer ID: MHANNSZ, Officer Name: MARK HANNSZ

[redacted] 00:41:35 : ssmith]
NEXT WRECKER/ 643 ON SCENE

[redacted] 00:27:19 : ssmith]
643 AT 5451

[redacted] 00:14:22 : ssmith]
DET TOOMBS CONTACTED, PER SGT HAMMOND/ HE WILL BE ENRT

[redacted] 00:11:58 : bbenton]
K90THP

[redacted] 00:02:48 : bbenton]
15770216

[redacted] 23:59:12 : ssmith]
VEH WAS AT ULRICH & ZION/ SEEN BY 635/ NO DIRECTION OF TRAVEL

[redacted] 23:57:50 : ssmith]
DK COLORED HONDA ACCORD

[redacted] 23:57:09 : ssmith]
630 ADVISED DRIVE-BY SHOOTING

[redacted] 23:56:30 : ssmith]
CALLER HAS GUNSHOT WOUND IN LEG, PER EMS//

[10/11/2004 23:55:22 : ssmith]
EMS SUPERVISOR IN FRT OF [redacted] AT THIS TIME, PER 625

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #.	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

[redacted] 23:53:59 : ssmith]
CALLER SAYS SHE'S BEEN SHOT/EMS ENRT

[redacted] 23:53:01 : ssmith]
PURPLE STRN/ FEMALE CALLER IS CRYING/BLEEDING

CASE#:
[redacted]04-002490

REPORTING OFFICER:
M. HANNSZUNIT 635

LOCATION:
13800 BLK OF ZION, TOMBALL, HARRIS COUNTY, TEXAS 77375

INTRODUCTION:
[redacted] AT APPROXIMATELY 2351 HOURS I OFFICER HANNSZ WAS DISPATCHED TO THE AREA OF TOMBALL HIGH SCHOOL FOR A REPORTED PERSON IN A PURPLE [redacted] SATURN FOUR DOOR WHO WAS BLEEDING. I ARRIVED IN THE AREA AND LOCATED THE VEHICLE PARKED IN THE DRIVE WAY OF TOMBALL JR. HIGH SCHOOL IN THE 13800 BLK OF ZION. THE VEHICLE WAS PARKED FACING EAST WITH THE HEADLIGHTS AND EMERGENCY FLASHERS ON. THERE WAS A FEMALE SUBJECT SITTING IN THE DRIVERS SEAT OF THE VEHICLE WAVING AT ME. I ADVISED DISPATCH THAT I HAD ARRIVED AND THE LOCATION OF THE VEHICLE.

SCENE SUMMARY:
THE 13800 BLOCK OF ZION IS LOCATED WEST OF THE INTERSECTION OF QUINN AND ZION. THE SCENE IS IN THE WESTERN MOST DRIVEWAY FOR [redacted] TOMBALL JR. HIGH SCHOOL OFF OF ZION.

REAL EVIDENCE:
A PURPLE [redacted] FOUR DOOR BEARING TX LP [redacted] TO BE PROCESSED BY CID/CSI UNIT.

DETAILS OF OFFENSE:
I EXITED MY PATROL VEHICLE AND APPROACHED THE DISTRAUGHT FEMALE DRIVER. AS I APPROACHED I OBSERVED THAT SHE WAS ON THE PHONE AND VERY HISTERICAL. I SAW BLOOD POOLOING ON THE DRIVERS FLOOR BOARD. I OBSERVED WHAT LOOKED LIKE A PUNCTURE WOUND THE SIZE OF A PENCILE. THERE WAS A STEADY DRIPPING OF BLOOD COMING FROM HER WOUND I ADVISED DISPATCH VIA RAIDO THAT I NEEDED EMS FOR WHAT APPEARED TO BE A GUN SHOT WOUND TO THE LEFT CALF. I ADVISED THE VICTIM THAT I WAS GOING TO MY CAR TO GET MY FIRST AID KIT AND WOULD BE BACK IN A MOMENT. I RETURNED TO MY VEHICLE AND DAWNED MY RUBBER GLOVES AND GOT SOME GAUZE TO PLACE ON THE WOUNDS UNTIL EMS ARRIVED. I THEN RETURNED TO

LOCATION
OFFENSE
VICTIM
ADMIN

INCIDENT REPORT

LOCATION

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted]

DATE(S) OF INCIDENT: TIME(S) OF INCIDENT:	REPORT TYPE	INCIDENT STATUS	EXCEPTIONAL CLEARANCE DATE	EXCEPTIONAL CLEARANCE
Start 10-11-[redacted] Start 23:51 End 10-11-[redacted] End 23:51	☑ INITIAL REPORT ☐ SUPPLEMENT	☐ UNFOUNDED ☐ CLEARED BY ARREST ☐ CLEARED EXCEPTIONAL ☐ PENDING ☑ INACTIVE		

LOCATION OF INCIDENT	COUNTY CODE	WEATHER:	LIGHTING:
13800 ZION	101	1 CLEAR	DARK (STREET LAMP LIT)

OFFENSE

	Statute / UCR CODE	Statute DESCRIPTION / UCR CODE DESCRIPTION	CJIS	STATUS COMPLETED	STATUS ATTEMPTED	OFFENDER
1	22.02(a)(2) 13A	AGG ASSLT W/DEADLY WEAPON 13A AGGRAVATED ASSAULT	13150005	☑	☐	UNKNOWN,
2				☐	☐	
3				☐	☐	

BIAS MOTIVATION (OFFENSE 1 - 3)
1 88 NONE (NO BIAS)
2
3

LOCATION OF OFFENSE (OFFENSE 1 - 3)
1 13800 BLK ZION
2
3

TYPE CRIMINAL ACTIVITY:
1
2
3

TYPE WEAPON/FORCE INVOLVED
1 11 FIREARM ☐ AUTOMATIC
2 ☐ AUTOMATIC
3 ☐ AUTOMATIC

(For Burglary Only) NUMBER OF PREMISES ENTERED: 0

METHOD OF ENTRY: F ☐ FORCIBLE; N ☑ NO FORCE

OFFENDER(S) USED: A ☐ ALCOHOL; C ☐ COMPUTER EQUIP; D ☐ DRUGS

☐ CARGO THEFT

VICTIM

VICTIM NAME: JONES, LANICIA SHUNTE PHONE: [redacted]

ADDRESS (Street, City, State, Zip): [redacted]

TYPE OF VICTIM	RACE:	SEX:	RESIDENT STATUS:	ETHNICITY:	AGE:
I PERSON/INDIVIDUAL (NOT A LAW ENFORCEMENT OFFICER)	BLACK/AFRICAN AMERICAN	FEMALE	N NON RESIDENT	N NOT HISPANIC/LATI	DOB: 02/26/1984 CONNECTED TO OFFENSE: 13A

AGGRAVATED ASSAULT CIRCUMSTANCES
1 10 UNKNOWN CIRCUMSTANCES
2

JUSTIFIABLE HOMICIDE CIRCUMSTANCE

INJURY TYPE
B ☐ BROKEN BONES; I ☐ POSS. INT INJURIES; L ☐ SEVERE LACERATION; U ☐ UNCONSCIOUSNESS
N ☐ NONE; M ☐ MINOR INJURY; O ☑ MAJOR INJURY; T ☐ LOSS OF TEETH

RELATIONSHIP OF VICTIM TO OFFENDER 1 - 10
1 2 3 4 5
6 7 8 9 10

ADMIN

REPORTING OFFICER	ID	DATE	REPORTING OFFICER SIGNATURE
HANNSZ, MARK	5811	[redacted]	

APPROVING SUPERVISOR	ID	DATE	APPROVING SUPERVISION SIGNATURE

INVESTIGATOR	ID	ASSISTING OFFICER	ID	ASSISTING OFFICER	ID
TOOMBS, DANNY	1528	GORMAN, VIRGINIA	3736	STACHMUS, FRANK	9613

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

THE VICTIM AND PLACED PRESSURE ON HER WOUND. I THEN NOTICED THAT THERE WAS A SECOND WOUND ON THE INNER CALF. I THEN APLLIED PRESSURE TO BOTH WOUNDS UNTIL EMS ARRIVED.

OFFICER GORMAN ARRIVED ON SCENE AND BEGAN GATHERING INFORMATION FROM THE VICTIM. SHE WAS IDENTIFIED BY HER TX DL AS JONES, LANICIA SHUNTE B/F 02/26/1984.

SGT. STACHMUS ARRIVED ON SCENE, MADE OBSERVATION OF THE SITUATION AND CONTACTED LT. SOLOMON VIA TELEPHONE AND ADVISED HIM OF THE SITIUATION AT HAND. LT. SOLOMON ADVISED SGT. STACHMUS TO CONTACT CID SGT. HAMMOND. SGT. HAMMOND THEN HAD DETECTIVE TOOMBS DISPATCHED TO THE SCENE FOR INVESTIGATION PURPOSES.

INVESTIGATOR TOOMBS ARRIVED ON SCENE AND MADE THE DETERMINATION THAT WE WOULD HAVE THE VEHICLE TOWED AND PLACED WITH AN IVESTIGATIVE HOLD. I THEN ADVISED DISPATCH TO SEND ME THE NEXT ROTATION WRECKER. THEY ADVISED THAT TOMBALL COLLISION WOULD BE ENROUTE.

I INVENTORIED THE VEHICLE AND LOCATED THE VICTIMS WALLET ON THE PASSENGER SIDE OF THE VEHICLE. I PLACED THE WALLET INTO MY PATROL CAR AND RELEASED THE VEHICLE TO THE DRIVER FOR TOMBALL COLLISION.

I ADVISED DISPATCH THAT I WOULD BE CLEAR FROM THE SCENE AND ENROUTE TO TOMBALL REGIONAL HOSPITAL TO FOLLOW UP ON THIS CASE AND DELIVER THE VICTIMS PROPERTY TO HER. I ARRIVED AT THE HOSPITAL AND MET WITH DETECTIVE TOOMBS AND OFFICER GORMAN. OFFICER GORMAN HAD ALREADY OBTAINED ALL THE INFORMATION FROM THE VICTIM SHE COULD BEFORE THE HOSPITAL STAFF MEDICATED HER. I RETURNED THE PROPERTY TO THE VICTIMS SISTER AND DETECTIVE TOOMBS SPOKE WITH HER ADVISING HER TO HAVE HER SISTER CONTACT HIM AS SOON AS SHE GATHERED HERSELF AAND COULD TELL US WHAT HAD HAPPENED.

I THEN CLEARED THE SCENE AND RETURNED TO THE TOMBALL POLICE DEPARTMENT FOR THIS REPORT.

COMPLAINANT/VICTIM
JONES, LANICIA SHUNTE B/F 02/26/1984

SUSPECT:
UNKNOWN AT THIS TIME

VEHICLE INVOLVED:
A PURPLE [redacted] BEARING TX/LP [redacted]

TOWED BY:

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

SUPPLEMENT

CASE NUMBER: 04-002490

[redacted]. AT APPROXIMATELY 2351 HRS., I OFFICER GORMAN RESPONDED TO CALL WITH OFFICER HANNSZ REGARDING A SUBJECT BLEEDING IN A VEHICLE ON ZION ROAD. UPON MY ARRIVAL OFFICER HANNSZ WAS ON LOCATION ASSISTING THE VICTIM, LANICIA SHUNTE JONES. MS. JONES WAS VERY UPSET, HYSTERICAL, STATING THAT SHE HAD BEEN SHOT. I OBSERVED A SMALL ROUND WOUND ON MS. JONES'S LEFT LEG AND BLOOD ON THE FLOOR BOARD OF THE VEHICLE. MS. JONES STATED AT THE SCENE THAT WHILE SHE WAS [redacted] MS. JONES POINTS IN THE DIRECTION OF TOMBALL HILLS. MS. JONES STATED AT THE SCENE THAT SHE DID NOT KNOW WHO COULD HAVE SHOT HER, BUT THAT SHE HAD SEEN A VEHICLE TRAVELING EAST BOUND LEAVING JUST AFTER SHE HEARD A LOUD POP. MS. JONES THOUGHT THAT SHE HAD [redacted]

NORTH WEST EMS ARRIVED AND TRANSPORTED MS. JONES TO TOMBALL HOSPITAL. I WAS TOLD BY SGT. STACHMUS TO MEET WITH MS. JONES AT THE TOMBALL HOSPITAL TO TRY AND GET ADDITIONAL INFORMATION.

UPON ARRIVAL AT TOMBALL HOSPITAL, I MET WITH MS. JONES WHO STATED THAT SHE WAS [redacted]. MS. JONES IS AN EMPLOYEE AT A [redacted] THAT IS LOCATED OFF OF QUINN ROAD. MS. JONES WAS GOING TO WORK TRAVELING EAST BOUND NEAR THE NORTH STAR SUBDIVISION, NOT TOMBALL HILLS AS STATED EARLIER, WHEN SHE OBSERVED A RED GAS CONTAINER TYPE BOX IN THE ROADWAY AND SHE OBSERVED A VEHICLE TRAVELING WEST BOUND, NOT EAST BOUND AS STATED EARLIER. MS. JONES STATED THAT SHE WAS SPEEDING AND WHEN SHE HAD SEEN THE VEHICLE APPROACHING HER SLOW DOWN SHE THOUGHT THAT IT WAS A POLICE PATROL VEHICLE SLOWING DOWN TO TURN AROUND AND STOP HER. MS. JONES STATED THAT SHE HAD SEEN THE VEHICLE CLOSE TO HER VEHICLE AS SHE WAS APPROACHING THE RED BOX IN THE ROADWAY, LOOKED AT THE SIDE OF THE VEHICLE AND NOTED THAT IT WAS A DARK, POSSIBLY MAROON STRATUS , NEWER MODEL. AS THE VEHICLE WAS PASSING, AND SHE WAS PASSING THE RED BOX IN THE ROADWAY, SHE HEARD A LOUD POP SOUND. MS. JONES STATED THAT SHE THOUGHT SHE HAD BLOWN A TIRE AND STARTED TO SLOW DOWN. AS MS. JONES WAS SLOWING DOWN, SHE FELT A WARM LIQUID RUNNING DOWN HER LEG AND WHEN SHE REACHED DOWN TO FEEL WHAT IT WAS, SHE NOTED THAT IT WAS BLOOD. MS. JONES STATED THAT SHE COULD NOT UNDERSTAND WHY A BLOWN TIRE WOULD CAUSE HER TO HAVE GOTTEN INJURED. MS. JONES CONTACTED THE TOMBALL POLICE DEPARTMENT WHEN SHE REALIZED THAT SHE HAD BEEN SHOT. LT. A. SOLOMON WAS IN THE ROOM WHEN I ARRIVED.

MS. JONES STATED THAT SHE DID NOT KNOW WHO COULD HAVE BEEN RESPONSIBLE FOR THIS INCIDENT, THAT SHE DID NOT HAVE ANY PROBLEMS AT HOME OR AT SCHOOL. FEW PEOPLE ARE AWARE OF WHERE SHE WORKS EXCEPT FOR HER FAMILY AND A FEW FRIENDS

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

SUPPLEMENT

I SPOKE WITH HOSPITAL PERSONNEL WHO ADVISED ME THAT THEY NOTIFIED MS. JONES'S FAMILY OF HER CONDITION. WHILE I WAS SPEAKING TO MS. JONES, HER SISTER ANGELA CROW ARRIVED. AFTER MS. JONES RECEIVED MEDICATION FOR PAIN, I WAS UNABLE TO TALK TO HER BECAUSE OF THE EFFECTS THE MEDICATION HAD ON HER. I GAVE MS. CROW A TOMBALL POLICE DEPARTMENT BUSINESS CARD WITH THIS CASE NUMBER, DETECTIVE TOOMBS NAME, MY NAME AND OFFICER HANNSZ'S NAME. OFFICER HANNSZ AND DETECTIVE TOOMBS ARRIVED AND I LEFT THE HOSPITAL TO COMPLETE THIS SUPPLEMENT.

DISPOSITION.
REFERRED TO INVESTIGATIONS

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

SUPPLEMENT

[redacted]-002490
D.R TOOMBS

[redacted] AT 0012HRS I WAS CONTACTED BY TOMBALL DISPATCH OF A POSSIBLE [redacted] SHOOTING THAT HAD OCCURED ON ZION RD. WEST OF QUINN RD.
I WENT TO THAT LOCATION, AND MET WITH OFFICER HANNZ , AND SGT. STACHMUS. I OBSERVED A HOLE IN THE DRIVERS DOOR OF THE SATURN. I OBSERVED THE HOLE WENT THROUGH THE DOOR. I OBSERVED WHAT APPEARED TO BE BLOOD ON THE LEFT SIDE OF THE FLOORBOARD NEXT TO THE DOOR. I OBSERVED A HOLE IN THE DRIVERS SEAT. I INSTRUCTED OFFICER HANNZ TO HAVE THE VEHICLE PICKED UP BY A WRECKER, AND TO HAVE A HOLD PLACED ON THE VEHICLE.
I WENT TO 605 HOLDERIETH (TOMBALL HOSPITAL) IN AN ATTEMPT TO SPEAK WITH THE VICTEM. MS. JONES WAS ALREADY FEELING THE EFFECTS OF THE PAIN MEDICATION SHE HAD BEEN GIVEN. I ADVISED MS. JONES'S SISTER TO HAVE MS. JONES CONTACT ME LATER THIS SAME DATE.

0930HRS MYSELF AND DETECTIVE JONES MET OFFICER KEN YOHO OF THE TOMBALL POLICE DEPARTMENT AT TOMBALL COLLISION (LOCATION OF STORED VEHICLE). I TOOK PHOTOS OF THE VEHICLE, AND USING A WOODEN DOWL, I FOUND THE PROJECTILE HAD ENTERED THE DRIVERS DOOR 10 3/8 INCH FROM THE FRONT OF THE DOOR. 29. INCHES FROM THE BACK END OF THE DOOR, AND 14 1/2 INCHES BELOW THE WINDOW. THE PROJECTILE ENTED THE DOOR AT AN ANGLE OF 55 DEGREES HORIZONTALLY, AND 78 DEGREES VERTICALLY. FROM THE GROUND UP TO THE HOLE WAS 19 1/4. FROM GROUND TO TIP OF ROD UP FROM GROUND WAS 21 1/8.
THE OVER ALL DEMINTIONS OF THE DOOR IS 39 5/8 LONG, AND 8 1/2 INCHES THICK. THE ROD THROUGH THE DOOR POINTED TO THE HOLE IN THE SEAT. IN CHECKING THE AREA BETWEEN THE DRIVERS SEAT AND THE CENTER CONSOLE, A BULLET WAS LOCATED IT DID NOT PENITRATE THE VINYL, BUT WHEN I PUSHED THE SEAT CUSHION FROM THE PASSENGER SIDE TOWARD THE DRIVERS SIDE, THE BULLET FELL OUT. THIS BULLET WAS PHOTOGRAPHED AND COLLECTED.
A SWAB WAS TAKEN OF THE BLOOD ON THE FLOORBOARD.

THE CAMERA, BULLET, AND SWABS WERE TAGGED UNDER EVIDENCE TAG E-5075.

I TELEPHONED MS. JONES AT HER SISTERS PHONE NUMBER [redacted]. MS. JONES ADVISED SHE WAS STILL I ALOT OF PAIN. I ASKED IF SHE WAS GOING TO BE ABLE TO SPEAK WITH ME ABOUT THE INCIDENT. SHE SAID, SHE WOULD HAVE TO WAIT FOR HER SISTER TO RETURN [redacted] THEN SHE WOULD CALL ME.

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I WILL RETURN TO ZION RD. ON [redacted] AND CHECK THE AREA FOR MORE POSSIBLE EVIDENCE.

INCIDENT REPORT
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TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

Person Name: JONES, LANICIA SHUNTE
, Category: VICTIM, Date Birth: 02/26/1984, Age Min: [redacted] Age Max: 0
, Sex: F, Race: B, Ethnicity: , Height: 505, Weight: 155, License State: TX, License_Number:
[redacted]
Business Name:

Tag: TX K90THP PC [redacted] VIN: [redacted]
Make: STRN Model: Year: [redacted] Color: PLE
Business: BEATY, CALVIN R & SHANNON D
Name: ,
Comments: TOMBALL COLLISION // FEB/03//5703 HEATHERBLOOM DR,HOUSTON,TX 77085

Complaint Type: ASSAULT - ASSAULT
Caller Name: [redacted]
Officer ID: MHANNSZ, Officer Name: MARK HANNSZ

[redacted] 00:41:35 : ssmith]
NEXT WRECKER/ 643 ON SCENE

[redacted] 00:27:19 : ssmith]
643 AT 5451

[redacted] 00:14:22 : ssmith]
DET TOOMBS CONTACTED, PER SGT HAMMOND/ HE WILL BE ENRT

[redacted] 00:11:58 : bbenton]
K90THP

[redacted] 00:02:48 : bbenton]
15770216

[redacted] 23:59:12 : ssmith]
VEH WAS AT ULRICH & ZION/ SEEN BY 635/ NO DIRECTION OF TRAVEL

[redacted] 23:57:50 : ssmith]
DK COLORED HONDA ACCORD

[redacted] 23:57:09 : ssmith]
630 ADVISED DRIVE-BY SHOOTING

[redacted] 23:56:30 : ssmith]
CALLER HAS GUNSHOT WOUND IN LEG, PER EMS//

[10/11/2004 23:55:22 : ssmith]
EMS SUPERVISOR IN FRT OF [redacted] AT THIS TIME, PER 625

INCIDENT REPORT
NARRATIVE

AGENCY	ORI #.	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted] 23:51:24

04-002490

[redacted] 23:53:59 : ssmith]
CALLER SAYS SHE'S BEEN SHOT/EMS ENRT

[redacted] 23:53:01 : ssmith]
PURPLE STRN/ FEMALE CALLER IS CRYING/BLEEDING

CASE#:
[redacted]04-002490

REPORTING OFFICER:
M. HANNSZUNIT 635

LOCATION:
13800 BLK OF ZION, TOMBALL, HARRIS COUNTY, TEXAS 77375

INTRODUCTION:
[redacted] AT APPROXIMATELY 2351 HOURS I OFFICER HANNSZ WAS DISPATCHED TO THE AREA OF TOMBALL HIGH SCHOOL FOR A REPORTED PERSON IN A PURPLE [redacted] SATURN FOUR DOOR WHO WAS BLEEDING. I ARRIVED IN THE AREA AND LOCATED THE VEHICLE PARKED IN THE DRIVE WAY OF TOMBALL JR. HIGH SCHOOL IN THE 13800 BLK OF ZION. THE VEHICLE WAS PARKED FACING EAST WITH THE HEADLIGHTS AND EMERGENCY FLASHERS ON. THERE WAS A FEMALE SUBJECT SITTING IN THE DRIVERS SEAT OF THE VEHICLE WAVING AT ME. I ADVISED DISPATCH THAT I HAD ARRIVED AND THE LOCATION OF THE VEHICLE.

SCENE SUMMARY:
THE 13800 BLOCK OF ZION IS LOCATED WEST OF THE INTERSECTION OF QUINN AND ZION. THE SCENE IS IN THE WESTERN MOST DRIVEWAY FOR [redacted] TOMBALL JR. HIGH SCHOOL OFF OF ZION.

REAL EVIDENCE:
A PURPLE [redacted] FOUR DOOR BEARING TX LP [redacted] TO BE PROCESSED BY CID/CSI UNIT.

DETAILS OF OFFENSE:
I EXITED MY PATROL VEHICLE AND APPROACHED THE DISTRAUGHT FEMALE DRIVER. AS I APPROACHED I OBSERVED THAT SHE WAS ON THE PHONE AND VERY HISTERICAL. I SAW BLOOD POOLOING ON THE DRIVERS FLOOR BOARD. I OBSERVED WHAT LOOKED LIKE A PUNCTURE WOUND THE SIZE OF A PENCILE. THERE WAS A STEADY DRIPPING OF BLOOD COMING FROM HER WOUND I ADVISED DISPATCH VIA RAIDO THAT I NEEDED EMS FOR WHAT APPEARED TO BE A GUN SHOT WOUND TO THE LEFT CALF. I ADVISED THE VICTIM THAT I WAS GOING TO MY CAR TO GET MY FIRST AID KIT AND WOULD BE BACK IN A MOMENT. I RETURNED TO MY VEHICLE AND DAWNED MY RUBBER GLOVES AND GOT SOME GAUZE TO PLACE ON THE WOUNDS UNTIL EMS ARRIVED. I THEN RETURNED TO

LOCATION
OFFENSE
VICTIM
ADMIN

INCIDENT REPORT

LOCATION

AGENCY	ORI #:	INCIDENT #:	REPORT DATE
TOMBALL POLICE DEPARTMENT	TX1012300	04-002490	[redacted]

DATE(S) OF INCIDENT: TIME(S) OF INCIDENT:	REPORT TYPE	INCIDENT STATUS	EXCEPTIONAL CLEARANCE DATE	EXCEPTIONAL CLEARANCE
Start 10-11-[redacted] Start 23:51 End 10-11-[redacted] End 23:51	☑ INITIAL REPORT ☐ SUPPLEMENT	☐ UNFOUNDED ☐ CLEARED BY ARREST ☐ CLEARED EXCEPTIONAL ☐ PENDING ☑ INACTIVE		

LOCATION OF INCIDENT	COUNTY CODE	WEATHER:	LIGHTING:
13800 ZION	101	1 CLEAR	DARK (STREET LAMP LIT)

OFFENSE

	Statute / UCR CODE	Statute DESCRIPTION / UCR CODE DESCRIPTION	CJIS	STATUS COMPLETED	STATUS ATTEMPTED	OFFENDER
1	22.02(a)(2) 13A	AGG ASSLT W/DEADLY WEAPON 13A AGGRAVATED ASSAULT	13150005	☑	☐	UNKNOWN,
2				☐	☐	
3				☐	☐	

BIAS MOTIVATION (OFFENSE 1 - 3)
1 88 NONE (NO BIAS)
2
3

LOCATION OF OFFENSE (OFFENSE 1 - 3)
1 13800 BLK ZION
2
3

TYPE CRIMINAL ACTIVITY:
1
2
3

TYPE WEAPON/FORCE INVOLVED
1 11 FIREARM ☐ AUTOMATIC
2 ☐ AUTOMATIC
3 ☐ AUTOMATIC

(For Burglary Only) NUMBER OF PREMISES ENTERED: 0

METHOD OF ENTRY: F ☐ FORCIBLE; N ☑ NO FORCE

OFFENDER(S) USED: A ☐ ALCOHOL; C ☐ COMPUTER EQUIP; D ☐ DRUGS

☐ CARGO THEFT

VICTIM

VICTIM NAME: JONES, LANICIA SHUNTE PHONE: [redacted]

ADDRESS (Street, City, State, Zip): [redacted]

TYPE OF VICTIM	RACE:	SEX:	RESIDENT STATUS:	ETHNICITY:	AGE:
I PERSON/INDIVIDUAL (NOT A LAW ENFORCEMENT OFFICER)	BLACK/AFRICAN AMERICAN	FEMALE	N NON RESIDENT	N NOT HISPANIC/LATI	DOB: 02/26/1984 CONNECTED TO OFFENSE: 13A

AGGRAVATED ASSAULT CIRCUMSTANCES
1 10 UNKNOWN CIRCUMSTANCES
2

JUSTIFIABLE HOMICIDE CIRCUMSTANCE

INJURY TYPE
B ☐ BROKEN BONES; I ☐ POSS. INT INJURIES; L ☐ SEVERE LACERATION; U ☐ UNCONSCIOUSNESS
N ☐ NONE; M ☐ MINOR INJURY; O ☑ MAJOR INJURY; T ☐ LOSS OF TEETH

RELATIONSHIP OF VICTIM TO OFFENDER 1 - 10
1 2 3 4 5
6 7 8 9 10

ADMIN

REPORTING OFFICER	ID	DATE	REPORTING OFFICER SIGNATURE
HANNSZ, MARK	5811	[redacted]	

APPROVING SUPERVISOR	ID	DATE	APPROVING SUPERVISION SIGNATURE

INVESTIGATOR	ID	ASSISTING OFFICER	ID	ASSISTING OFFICER	ID
TOOMBS, DANNY	1528	GORMAN, VIRGINIA	3736	STACHMUS, FRANK	9613

INCIDENT REPORT
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THE VICTIM AND PLACED PRESSURE ON HER WOUND. I THEN NOTICED THAT THERE WAS A SECOND WOUND ON THE INNER CALF. I THEN APLLIED PRESSURE TO BOTH WOUNDS UNTIL EMS ARRIVED.

OFFICER GORMAN ARRIVED ON SCENE AND BEGAN GATHERING INFORMATION FROM THE VICTIM. SHE WAS IDENTIFIED BY HER TX DL AS JONES, LANICIA SHUNTE B/F 02/26/1984.

SGT. STACHMUS ARRIVED ON SCENE, MADE OBSERVATION OF THE SITUATION AND CONTACTED LT. SOLOMON VIA TELEPHONE AND ADVISED HIM OF THE SITIUATION AT HAND. LT. SOLOMON ADVISED SGT. STACHMUS TO CONTACT CID SGT. HAMMOND. SGT. HAMMOND THEN HAD DETECTIVE TOOMBS DISPATCHED TO THE SCENE FOR INVESTIGATION PURPOSES.

INVESTIGATOR TOOMBS ARRIVED ON SCENE AND MADE THE DETERMINATION THAT WE WOULD HAVE THE VEHICLE TOWED AND PLACED WITH AN IVESTIGATIVE HOLD. I THEN ADVISED DISPATCH TO SEND ME THE NEXT ROTATION WRECKER. THEY ADVISED THAT TOMBALL COLLISION WOULD BE ENROUTE.

I INVENTORIED THE VEHICLE AND LOCATED THE VICTIMS WALLET ON THE PASSENGER SIDE OF THE VEHICLE. I PLACED THE WALLET INTO MY PATROL CAR AND RELEASED THE VEHICLE TO THE DRIVER FOR TOMBALL COLLISION.

I ADVISED DISPATCH THAT I WOULD BE CLEAR FROM THE SCENE AND ENROUTE TO TOMBALL REGIONAL HOSPITAL TO FOLLOW UP ON THIS CASE AND DELIVER THE VICTIMS PROPERTY TO HER. I ARRIVED AT THE HOSPITAL AND MET WITH DETECTIVE TOOMBS AND OFFICER GORMAN. OFFICER GORMAN HAD ALREADY OBTAINED ALL THE INFORMATION FROM THE VICTIM SHE COULD BEFORE THE HOSPITAL STAFF MEDICATED HER. I RETURNED THE PROPERTY TO THE VICTIMS SISTER AND DETECTIVE TOOMBS SPOKE WITH HER ADVISING HER TO HAVE HER SISTER CONTACT HIM AS SOON AS SHE GATHERED HERSELF AAND COULD TELL US WHAT HAD HAPPENED.

I THEN CLEARED THE SCENE AND RETURNED TO THE TOMBALL POLICE DEPARTMENT FOR THIS REPORT.

COMPLAINANT/VICTIM
JONES, LANICIA SHUNTE B/F 02/26/1984

SUSPECT:
UNKNOWN AT THIS TIME

VEHICLE INVOLVED:
A PURPLE [redacted] BEARING TX/LP [redacted]

TOWED BY:

INCIDENT REPORT
NARRATIVE

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SUPPLEMENT

CASE NUMBER: 04-002490

[redacted]. AT APPROXIMATELY 2351 HRS., I OFFICER GORMAN RESPONDED TO CALL WITH OFFICER HANNSZ REGARDING A SUBJECT BLEEDING IN A VEHICLE ON ZION ROAD. UPON MY ARRIVAL OFFICER HANNSZ WAS ON LOCATION ASSISTING THE VICTIM, LANICIA SHUNTE JONES. MS. JONES WAS VERY UPSET, HYSTERICAL, STATING THAT SHE HAD BEEN SHOT. I OBSERVED A SMALL ROUND WOUND ON MS. JONES'S LEFT LEG AND BLOOD ON THE FLOOR BOARD OF THE VEHICLE. MS. JONES STATED AT THE SCENE THAT WHILE SHE WAS [redacted] MS. JONES POINTS IN THE DIRECTION OF TOMBALL HILLS. MS. JONES STATED AT THE SCENE THAT SHE DID NOT KNOW WHO COULD HAVE SHOT HER, BUT THAT SHE HAD SEEN A VEHICLE TRAVELING EAST BOUND LEAVING JUST AFTER SHE HEARD A LOUD POP. MS. JONES THOUGHT THAT SHE HAD [redacted]

NORTH WEST EMS ARRIVED AND TRANSPORTED MS. JONES TO TOMBALL HOSPITAL. I WAS TOLD BY SGT. STACHMUS TO MEET WITH MS. JONES AT THE TOMBALL HOSPITAL TO TRY AND GET ADDITIONAL INFORMATION.

UPON ARRIVAL AT TOMBALL HOSPITAL, I MET WITH MS. JONES WHO STATED THAT SHE WAS [redacted]. MS. JONES IS AN EMPLOYEE AT A [redacted] THAT IS LOCATED OFF OF QUINN ROAD. MS. JONES WAS GOING TO WORK TRAVELING EAST BOUND NEAR THE NORTH STAR SUBDIVISION, NOT TOMBALL HILLS AS STATED EARLIER, WHEN SHE OBSERVED A RED GAS CONTAINER TYPE BOX IN THE ROADWAY AND SHE OBSERVED A VEHICLE TRAVELING WEST BOUND, NOT EAST BOUND AS STATED EARLIER. MS. JONES STATED THAT SHE WAS SPEEDING AND WHEN SHE HAD SEEN THE VEHICLE APPROACHING HER SLOW DOWN SHE THOUGHT THAT IT WAS A POLICE PATROL VEHICLE SLOWING DOWN TO TURN AROUND AND STOP HER. MS. JONES STATED THAT SHE HAD SEEN THE VEHICLE CLOSE TO HER VEHICLE AS SHE WAS APPROACHING THE RED BOX IN THE ROADWAY, LOOKED AT THE SIDE OF THE VEHICLE AND NOTED THAT IT WAS A DARK, POSSIBLY MAROON STRATUS , NEWER MODEL. AS THE VEHICLE WAS PASSING, AND SHE WAS PASSING THE RED BOX IN THE ROADWAY, SHE HEARD A LOUD POP SOUND. MS. JONES STATED THAT SHE THOUGHT SHE HAD BLOWN A TIRE AND STARTED TO SLOW DOWN. AS MS. JONES WAS SLOWING DOWN, SHE FELT A WARM LIQUID RUNNING DOWN HER LEG AND WHEN SHE REACHED DOWN TO FEEL WHAT IT WAS, SHE NOTED THAT IT WAS BLOOD. MS. JONES STATED THAT SHE COULD NOT UNDERSTAND WHY A BLOWN TIRE WOULD CAUSE HER TO HAVE GOTTEN INJURED. MS. JONES CONTACTED THE TOMBALL POLICE DEPARTMENT WHEN SHE REALIZED THAT SHE HAD BEEN SHOT. LT. A. SOLOMON WAS IN THE ROOM WHEN I ARRIVED.

MS. JONES STATED THAT SHE DID NOT KNOW WHO COULD HAVE BEEN RESPONSIBLE FOR THIS INCIDENT, THAT SHE DID NOT HAVE ANY PROBLEMS AT HOME OR AT SCHOOL. FEW PEOPLE ARE AWARE OF WHERE SHE WORKS EXCEPT FOR HER FAMILY AND A FEW FRIENDS

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I SPOKE WITH HOSPITAL PERSONNEL WHO ADVISED ME THAT THEY NOTIFIED MS. JONES'S FAMILY OF HER CONDITION. WHILE I WAS SPEAKING TO MS. JONES, HER SISTER ANGELA CROW ARRIVED. AFTER MS. JONES RECEIVED MEDICATION FOR PAIN, I WAS UNABLE TO TALK TO HER BECAUSE OF THE EFFECTS THE MEDICATION HAD ON HER. I GAVE MS. CROW A TOMBALL POLICE DEPARTMENT BUSINESS CARD WITH THIS CASE NUMBER, DETECTIVE TOOMBS NAME, MY NAME AND OFFICER HANNSZ'S NAME. OFFICER HANNSZ AND DETECTIVE TOOMBS ARRIVED AND I LEFT THE HOSPITAL TO COMPLETE THIS SUPPLEMENT.

DISPOSITION.
REFERRED TO INVESTIGATIONS

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ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX -

DATE: 02/06/2025

From: Heather Goleman, Deputy Clerk
(337) 433-9403

SUBJECT: Louisiana 3rd Circuit - Case No. CW 25 00044
Lower Court Case No.: 2023-2124
Calcasieu
Fourteenth Judicial District C

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

To: Hon. Ronald C. Richard
Attorney at Law
330 Alamo Street
Lake Charles, LA 70601
Fax No. (337) 494-1793
Work No. (337) 494-1900

Oliver Jackson Schrumpf
Schrumpf & Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson Schrumpf	Counsel for: John Clifford J. King
Edward Kelly Bauman	Counsel for: Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, . . . on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider . . . motions [regarding pauper status]" *Mason v. Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v. Ferrington*, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of the order of appeal, the trial court does not have jurisdiction to hear the pro se

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0002/0003 F-327

motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

SJG	JWP	CD

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0003/0003 F-327

King Continuance Confidential Medical Record. Motions to Dismiss Untimely filed motions

From: True King <truekingfile@gmail.com>

To: kay.bang@lccitycourt.org

Cc: KAMIE DOMINIC <kamiedominiclaw@gmail.com>, John King <johncjking86@gmail.com>

Date: Mon, 04 Nov 2024 17:51:13 -0500

Attachments:
23-2124 Redd Exhibits Amos (1).pdf
signed Not23-2124.pdf
LASAS # 380702-01 DCFS harassment.pdf
Charmaine USPS Harassment.pdf
Screenshot 2024-11-04 5.49.18 PM.png

Ms Bang, Honorable Judge
Attached you will find motion for continuance, motions to strike, motions to Quash.In addition to attached motions and medical chart provided by cancer center, ambulance transport, hospital admission and discharge, muscular skeletal and discharge you will find physical copies in the mail. Hon Judge Redd has helped me learn a great deal, and he will observe that Ms Kamie Dominic is not compliant with civil procedure. The motion she filed on Thursday October 31, has to be filed with the clerk's office and served upon me via email or in person 15 days prior to trial date and since Friday was a legal holiday she said on Friday Nov 1 2024 that she was only required to provide a courtesy copy. She is mistaken only in juvenile and family court that exception is permitted and per her filing last spring she refused to allow evidence or motions citing that they were untimely filed. Although she was served. I'm doing the best I can prove and am under intense harassment from a stalker who will not leave me alone.The following exhibits should clear up any lies told by the defendant and anyone calling on their behalf and I will be using all evidence to appeal this case if necessary until justice prevails and the law is followed. Colston and Amos have yet to provide a single exhibit or present a witness or even say they didn't do it. Ms Dominic aims to play politics and feels confident that Judge Richard doesnt want Ms Amos to suffer for AMos actions I assure you in the evidence you will no longer presume Amos as innocent she has done this before and their attempts to discredit a father who is a victim does not change that Im owed damages and have suffered enough from their games and lies. I'm asking that the playing field and any biases Dominic feels will weigh in her favor be disregarded and this case start over with full facts and justice.

Additionally we are requesting that medical records be sealed as you can see by the petition and is confirmed on the transaction Record Charmaine Y Colston has a disturbing history of continued harassment stalking and obsession and in March 2024 Charmaine Colston is on your

record on transactions for this case requesting conformed copies although her attorney later the next month said Charmaine could not be served and was irrelevant to the proceedings. This stalking caught on record further reiterates my need for protection of medical records as she also placed my former medical records from my neurosurgeon on facebook taunting my mother that I was going to die and she was going to collect all of the insurance money. This caused medical responses for my grandmother, illness for my mother and traumatic for my children and provoked more seizures. Judge Redd my medical was submitted as further proof of my cooperation and to dispute the disgraceful claims made by Kamie Dominic stating that my medical condition wasn't severe and or wasn't legitimate although in my motion for continuance I meet the Louisiana requirements for continuance based on medical emergency. Please note that previous records and exhibits of my degenerative condition were provided to you last year. Ive been discharged twice in the last 4 weeks and currently discharged unto a rolling walker and provided video of the therapy on the walker. Neurosurgeons are backed up and there is a shortage so I have appointments tomorrow and november 13 and in outpatient physical therapy and in treatment. This spinal cord injury and the permanent damage that followed is a result of the stalking and non stop harassment of Charmaine Colston she in one of many fake hospital emergencies told me my son was having emergency surgery and would die and i needed to rush back to Lake Charles from work in NJ I slipped and fell on the ice and lay there until my wife found me in the parking lot by my truck the compression from the fall leads to permanent damage after 24-48 hours and at the time I had no health insurance this was months before she stole the car. She runs around obtaining files and mailing them anonymously to my mother, upset and bragging about my death on facebook this is sickening behavior. I have been a victim of domestic violence repeatedly for over ten years and it is sexist and shameful that Ms Dominic would make a mockery of my disability by referring to Colston as a paramour. Its the equivalent of having female a rape victim referring to her attacker as a paramlour and I will be asking that the traumatizing misrepresentation be stricken from the record. It's time that the bullying and her back room efforts to undermine justice stop and that the truth of this fraudulent transaction come to light. The only reason the intense extent was not revealed earlier is because I was in custody proceedings and as you can tell from the attachments my concerns are warranted and she and Ms Amos were well aware I wasnt in the state at the time as I was not even able to fly the month and day the fraud occurred and had just finished a critical medical procedure in my spine this too will be introduced as previously I needed proof that she was accessing these case files for her own harassment and obsession. Your record on this case clearly show I am telling the

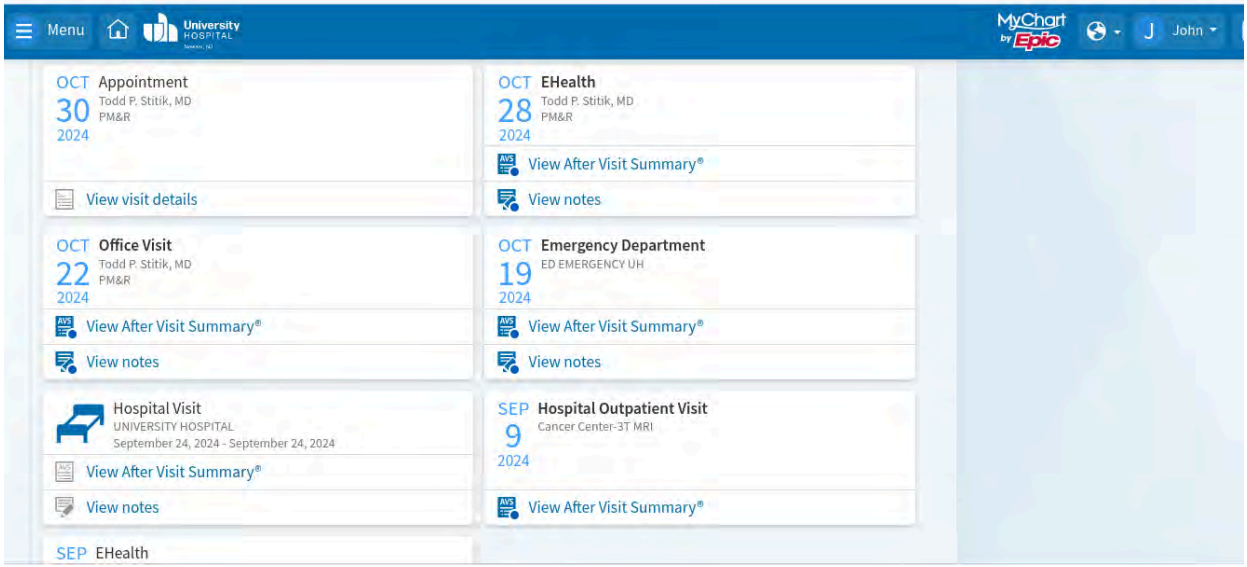
truth she will not leave me alone but isnt woman enough to own up to these crimes against me.

These motions filed on Thursday require litigation and proposed counsel called to enroll based on pricing for a scope of work, her additional untimely motions changed the fee, and scope of work and time. Therefore when counsel called to enroll on Thursday the additional motions which were not served upon me I had no copies to provide the context so counsel couldn't enroll blindly considering the seriousness and gravity of this case and the likelihood of appeal he didn't want to make mistakes such as the ones made by Ms Dominic, I couldn't have predicted a seizure and tearing my spinal cord so how are her filings untimely my fault? Judge Richard personal preference prevents my appearance via zoom and with my speech and spine affected all of this requires consideration. Please call me with any questions.

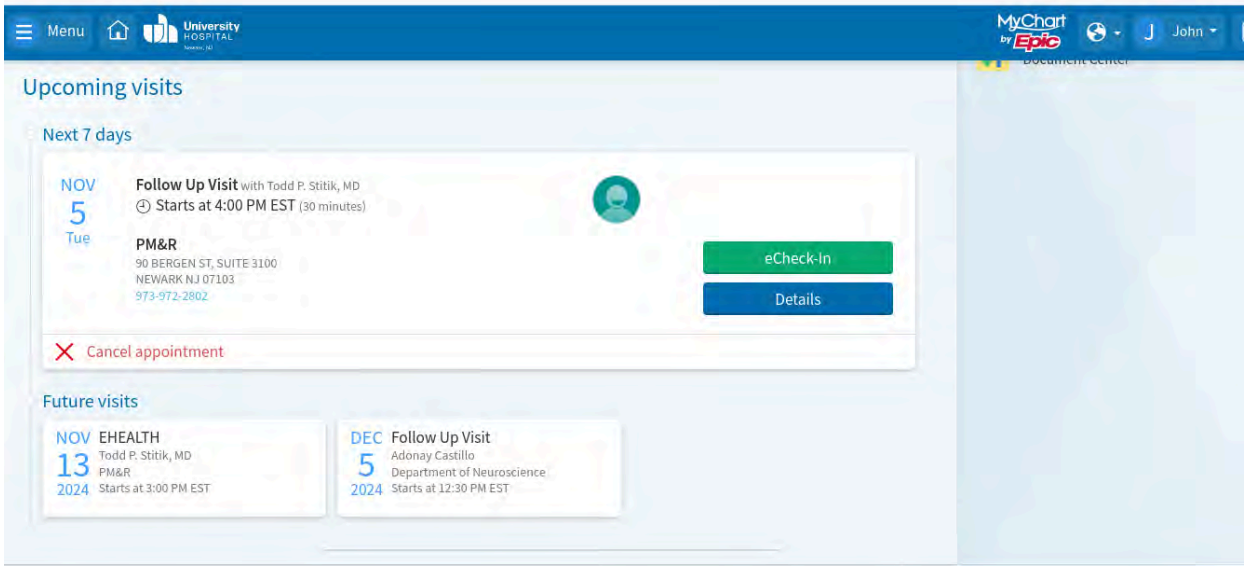
Please forgive me Im not an attorney and Im pro se and as Ms Dominic has displayed multiple times even attorneys get confused about the laws so I dont know whats needed to overrule her untruth in her motions filed untimely.
Thank You
John King

Case #23-2124 King VsAmos
11/04/2024
Confidential Medical Record from
Cancer center, Ambulance, Emergency Room, Hospital Admittance
Discharged on rolling walker to Muscular Skeletal and Neuro for seizures

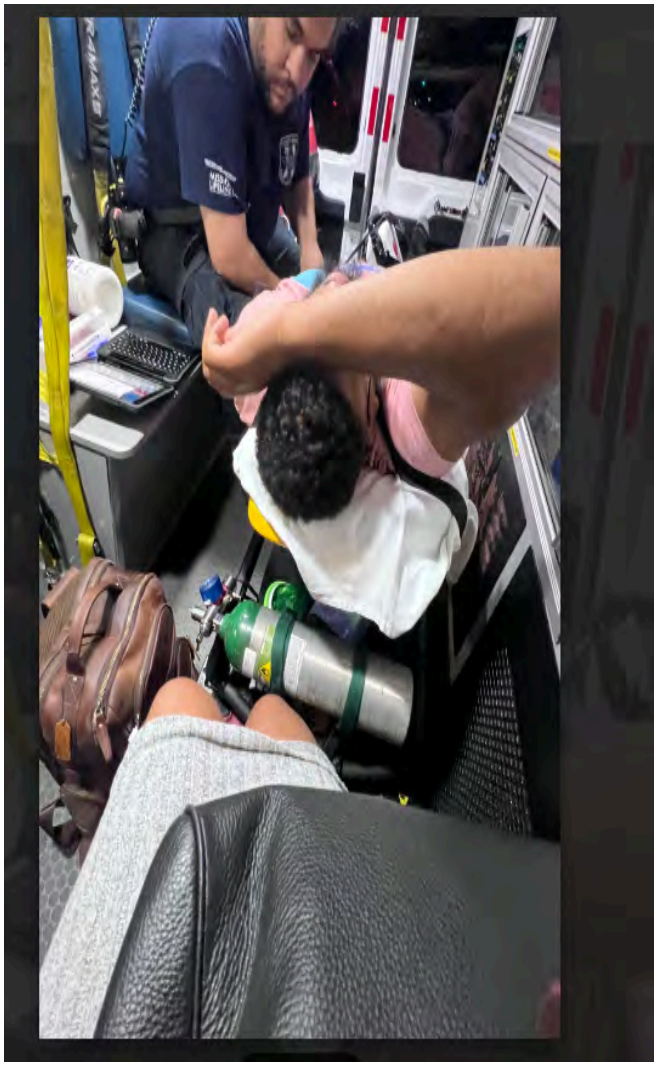
King Medical Records
September 9. 2024 - Cancer center outpatient
Oct 19, 2024 - taken to hospital by ambulance seizures - admitted temporary paralysis spinal tear
Oct 24, 2024 discharged to Muscular Skeletal and Neurology
Oct 28, 2024 - Muscular Skeletal
Oct 30, 2024 - Muscular Skeletal

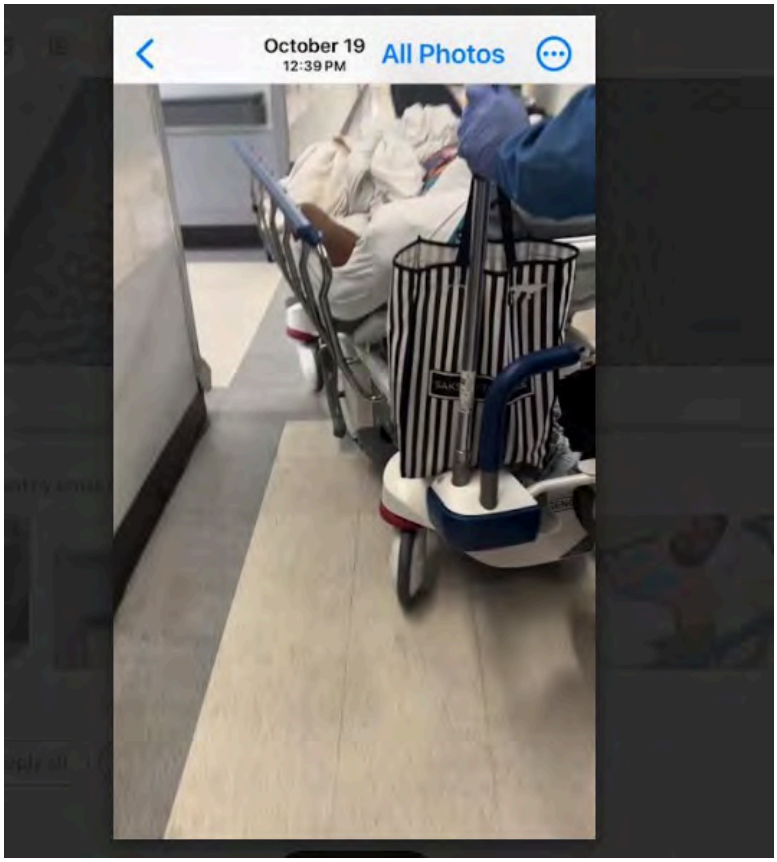


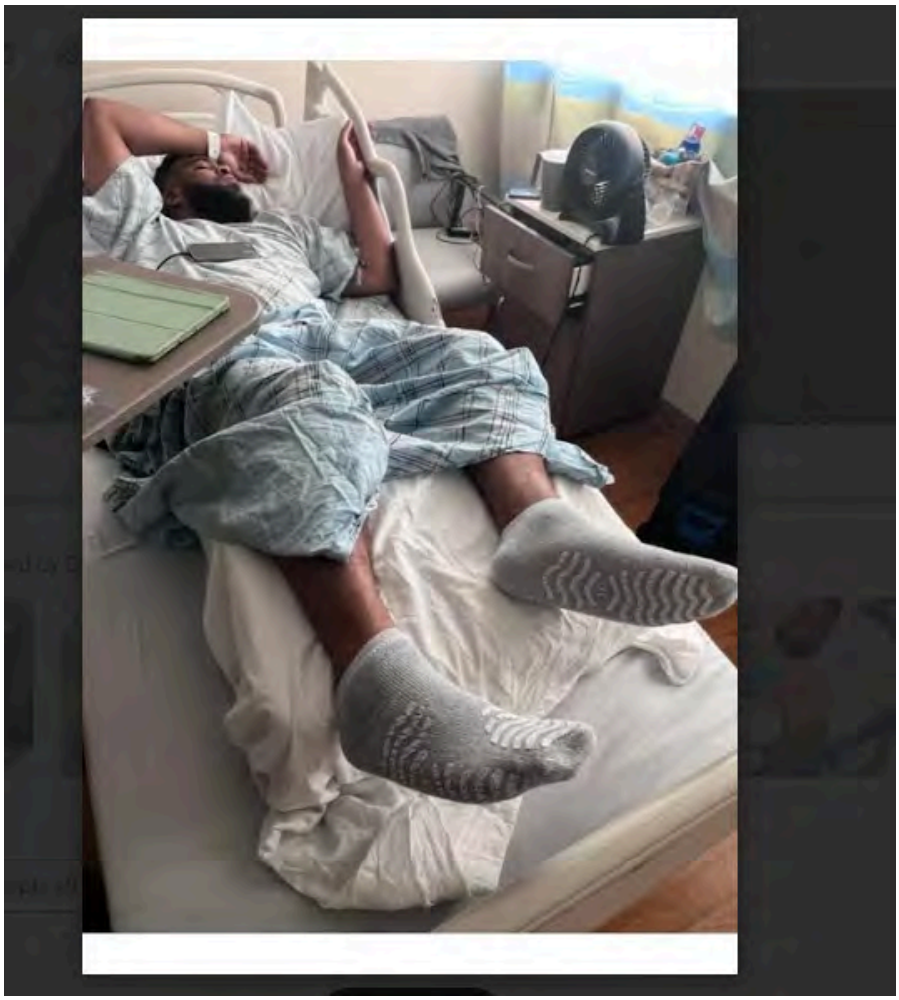
King Upcoming Nuerology and Muscular Skeletal
November 5, 2024 - Muscular Skeletal - review spinal cord swelling
November 13, 2023 - outpatient epidural to stabilize spinal tear
December 5, 2024 - Results of from neurosurgeon from outpatient treatment at cancer center and physical therapy


Menu
University HOSPITAL
MyChart by Epic
John
Upcoming visits
Next 7 days
NOV
5
Tue
Follow Up Visit with Todd P. Stitik, MD
Starts at 4:00 PM EST (30 minutes)
PM&R
90 BERGEN ST, SUITE 3100
NEWARK NJ 07103
973-972-2802
eCheck-In
Details
Cancel appointment
Future visits
NOV
13
2024
EHEALTH
Todd P. Stitik, MD
PM&R
Starts at 3:00 PM EST
DEC
5
2024
Follow Up Visit
Adonay Castillo
Department of Neuroscience
Starts at 12:30 PM EST

Photos

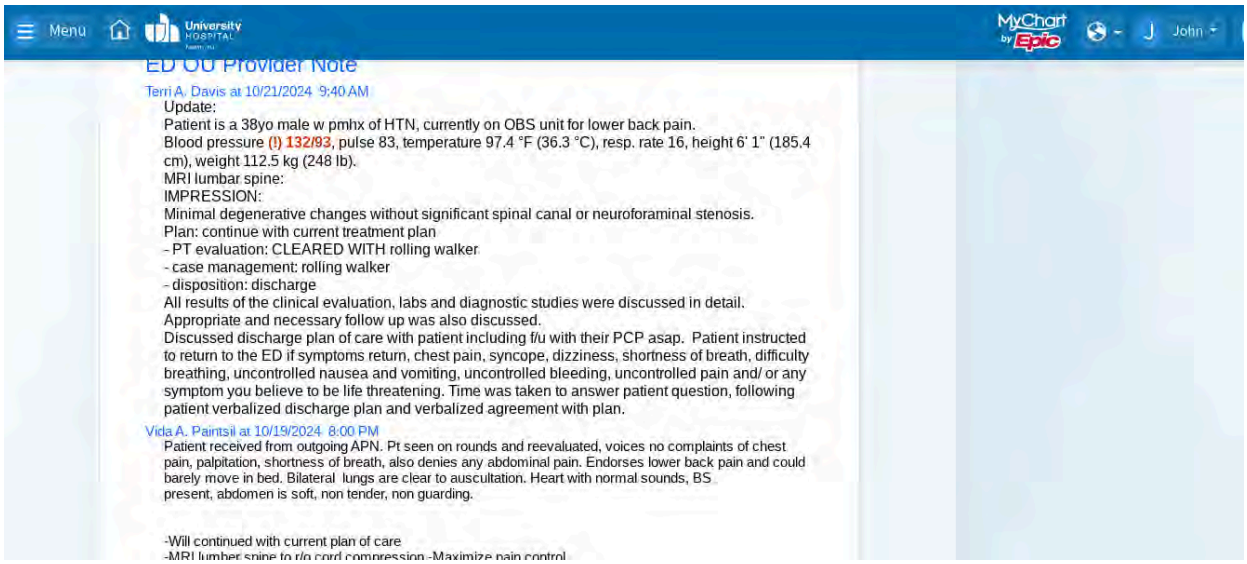



October 19
12:39 PM
All Photos





Discharged on Rolling Walker, Compressed Spine History of Seizures



Menu University Hospital MyChart by Epic John

ED OU Provider Note

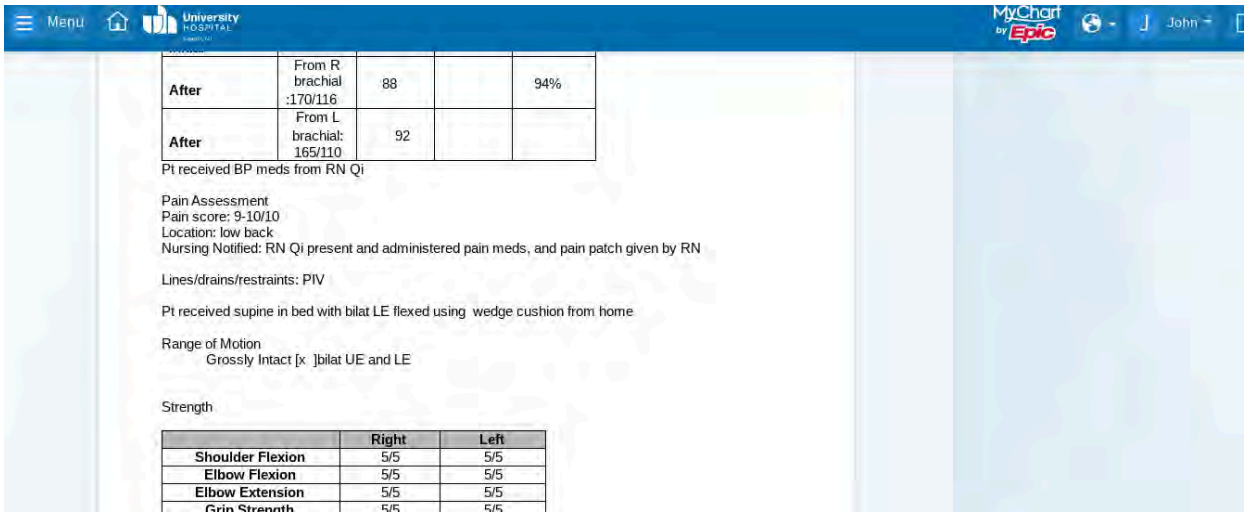
Terri A. Davis at 10/21/2024 9:40 AM

Update:
Patient is a 38yo male w pmhx of HTN, currently on OBS unit for lower back pain.
Blood pressure (!) 132/93, pulse 83, temperature 97.4 °F (36.3 °C), resp. rate 16, height 6' 1" (185.4 cm), weight 112.5 kg (248 lb).
MRI lumbar spine:
IMPRESSION:
Minimal degenerative changes without significant spinal canal or neuroforaminal stenosis.
Plan: continue with current treatment plan
- PT evaluation: CLEARED WITH rolling walker
- case management: rolling walker
- disposition: discharge
All results of the clinical evaluation, labs and diagnostic studies were discussed in detail.
Appropriate and necessary follow up was also discussed.
Discussed discharge plan of care with patient including f/u with their PCP asap. Patient instructed to return to the ED if symptoms return, chest pain, syncope, dizziness, shortness of breath, difficulty breathing, uncontrolled nausea and vomiting, uncontrolled bleeding, uncontrolled pain and/ or any symptom you believe to be life threatening. Time was taken to answer patient question, following patient verbalized discharge plan and verbalized agreement with plan.

Vida A. Paintsil at 10/19/2024 8:00 PM

Patient received from outgoing APN. Pt seen on rounds and reevaluated, voices no complaints of chest pain, palpitation, shortness of breath, also denies any abdominal pain. Endorses lower back pain and could barely move in bed. Bilateral lungs are clear to auscultation. Heart with normal sounds, BS present, abdomen is soft, non tender, non guarding.

-Will continued with current plan of care
-MRI lumber spine to r/o cord compression -Maximize pain control



After	From R brachial :170/116	88		94%
After	From L brachial: 165/110	92		

Pt received BP meds from RN Qi

Pain Assessment
Pain score: 9-10/10
Location: low back
Nursing Notified: RN Qi present and administered pain meds, and pain patch given by RN

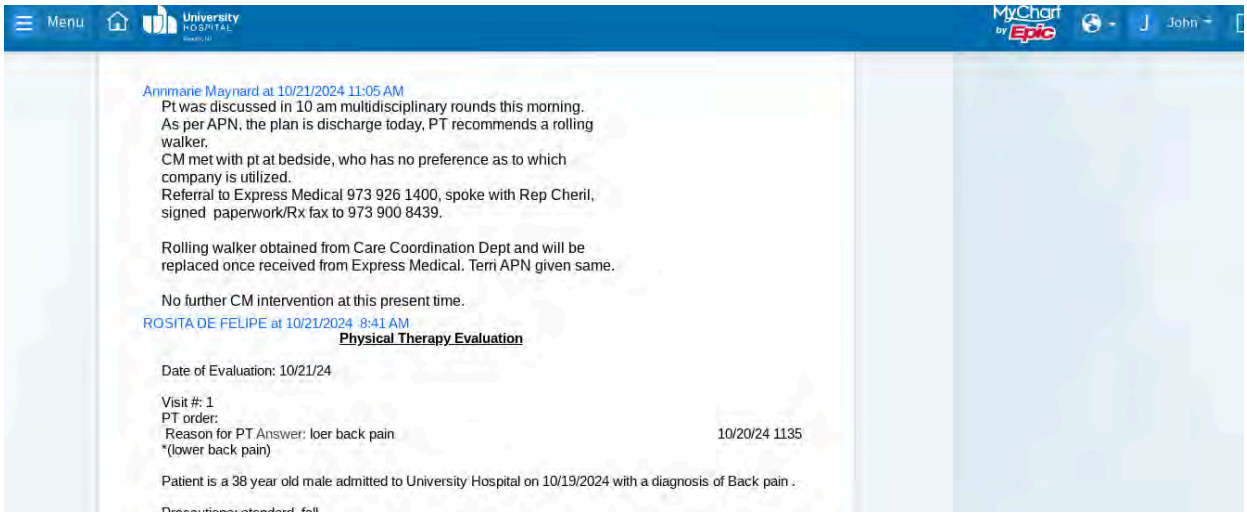
Lines/drains/restraints: PIV

Pt received supine in bed with bilat LE flexed using wedge cushion from home

Range of Motion
Grossly Intact [x]bilat UE and LE

Strength

	Right	Left
Shoulder Flexion	5/5	5/5
Elbow Flexion	5/5	5/5
Elbow Extension	5/5	5/5
Grip Strength	5/5	5/5



Annmarie Maynard at 10/21/2024 11:05 AM

Pt was discussed in 10 am multidisciplinary rounds this morning.
As per APN, the plan is discharge today, PT recommends a rolling walker.
CM met with pt at bedside, who has no preference as to which company is utilized.
Referral to Express Medical 973 926 1400, spoke with Rep Cheril, signed paperwork/Rx fax to 973 900 8439.

Rolling walker obtained from Care Coordination Dept and will be replaced once received from Express Medical. Terri APN given same.

No further CM intervention at this present time.

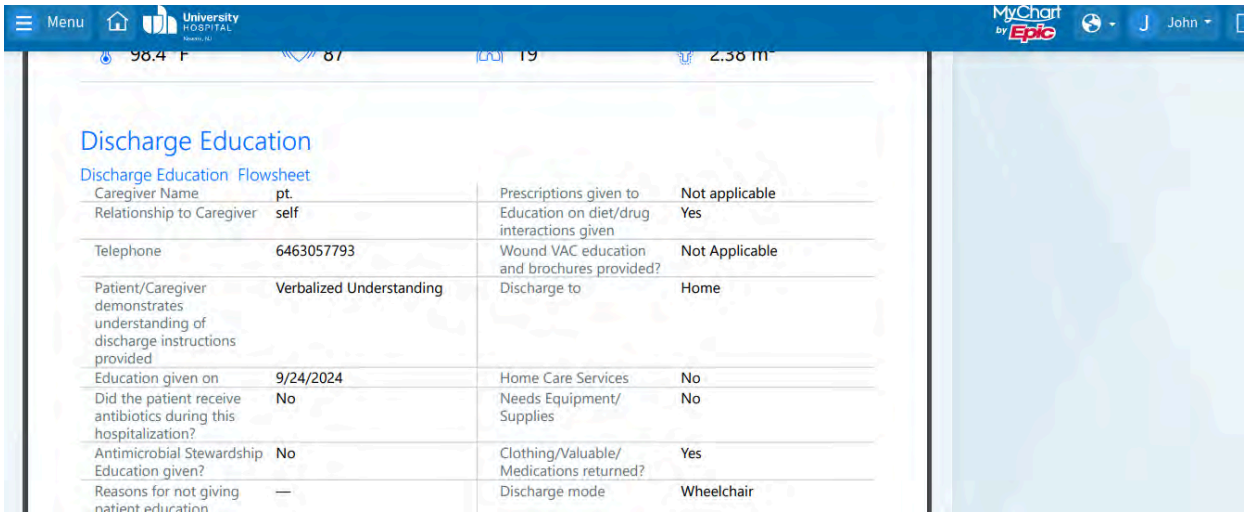
ROSITA DE FELIPE at 10/21/2024 8:41 AM

Physical Therapy Evaluation

Date of Evaluation: 10/21/24

Visit #: 1
PT order:
Reason for PT Answer: loer back pain 10/20/24 1135
*(lower back pain)

Patient is a 38 year old male admitted to University Hospital on 10/19/2024 with a diagnosis of Back pain .



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Discharge Education

Discharge Education Flowsheet

Caregiver Name	pt.	Prescriptions given to	Not applicable
Relationship to Caregiver	self	Education on diet/drug interactions given	Yes
Telephone	6463057793	Wound VAC education and brochures provided?	Not Applicable
Patient/Caregiver demonstrates understanding of discharge instructions provided	Verbalized Understanding	Discharge to	Home
Education given on	9/24/2024	Home Care Services	No
Did the patient receive antibiotics during this hospitalization?	No	Needs Equipment/ Supplies	No
Antimicrobial Stewardship Education given?	No	Clothing/Valuable/ Medications returned?	Yes
Reasons for not giving patient education	—	Discharge mode	Wheelchair

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601
  kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant’s Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis

I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant's **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), "excited utterance"**, and **La. C.E. Art. 803(3), "then-existing mental, emotional, or physical condition"**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses' statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant's claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Case # 23-2124
King Vs Amos The Hartford

Motions Continuance DismissQuash
10/31/2024

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the 31st day of October, 2024, at 6:58 o'clock AM/PM, Lake Charles, Louisiana.

5/31/24

signature

STATE OF LOUISIANA

Case # 23-2124 Motions Continuance DismissQuash
King Vs Amos The Hartford 10/31/2024

PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared **John CJ King Sr.**, who, after being duly sworn, did depose and say:

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical



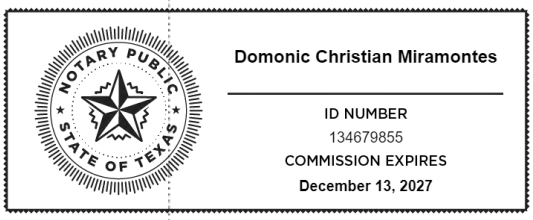
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DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 10/31/2024

Number of Pages (including notarial certificate): 7



State of Texas

County of Bexar

This instrument was acknowledged before me by means of an interactive two-way audio and video communication on 10/31/2024 by John Clifford King.

June 3, 2024 *johncjking86@gmail.com*
LASES# 380702-01
John C King

Urgent Attention: Charde Carter
CC: Randall Sterrett Attorney DCFS Lake Charles,LA
DCFS Child Support Enforcement
PO Box 94065
Baton, Rouge LA 70821
Reference Calcasieu Civil Case # 2021-2773
King: Plaintiff
Colston: Defendant

LETTER OF WARNING: CRIMINAL ACTIVITY INVOLVED
Warning Disturbing Images Attached-*Memorialize this for the Record at DCFS*

Good Morning Ms Carter,

I am responding to a letter from Ms Charde Carter, (image below),as it is stated it is mandatory that I respond. It was dated May 22, 2022 and I had a surgical procedure that week. It is documented and recorded. Ms Carter I am ashamed that you and your office are being dragged into this increasingly contentious case that is becoming not only criminal in nature but violent as well and I must warn you and your supervisor so that your agency does not accidentally overstep into state and federal criminal and civil proceedings.

I am only responding because you contacted me and said it's mandatory and my legal counsel is on vacation and can't respond by your deadline.

I am tired and I want this to end but not with innocent people getting hurt like my children and family have been subjected to.

She has a mental illness and if after reading the notes and my ongoing medical record and employment history you cannot see that i don't know what else to do. Go pull my record. Why do I keep losing good jobs? Why are my coworkers the last 13+ years all saying the same thing in affidavit? Its a form of domestic violence and financial abuse and case workers such as yourself get roped in without knowing the destruction and violence and mood swings Charmaine Coslton is capable of. She is unstable and obsessed and its continuing to escalate with me as her intended victim.

I am also required to provide all correspondence that would interrupt my civil rights to indemnify me the rights to a company asset that has a lien against it by an FDIC accredited institution against the value of the automobile which takes precedent and since you do not know all of the

details involved in this complex legal minefield that Charmaine is dragging you into I caution you as Mr Sterret can attest the last person Renee Amos committed a federal crime she claims she was manipulated by Charmaine Colston with the poor single mother narrative only to now be on trial for felony involvement in stolen vehicle, fraud debt instrument, false power of attorney, false transfer of securities fraud all by agreeing to notarize documents while i was married and living out of state and I was not in the state with ID in hand nor did I provide signature. Ms Amos is now financially on the line for the mistake made.

She is now trying to loop Ms Carter and DCFS into the proceedings so that when State Farm and The Hartford seek recourse for federal laws being broken which state that Colston can by no means benefit from a crime she involved herself in with intent to defraud for financial gain. If a state government agency unknowingly involves themself then Charmaine will simply allow both insurance companies to sue the DCFS for recourse stating that you used the DCFS agency to circumvent federal law. If she burned my house down and an insurance company indemnify me for my losses and you send a letter to my lawyer stating that they must turn over the funds to Ms Colston and say that it is your authority as a government agency to aid in that criminal behavior i can assure you State Farm will seek recourse to recoup their losses. Child support does not involve indemnity, marital assets, or automobiles with liens against them which is the case in this matter. **A collateral loan was taken out against my stolen vehicle and the financial institution is demanding to be indemnified for their losses as I then lost my job. I will find it necessary in any proceedings with them to let them know that I did fight to get their funds back to them as liens and indemnity ARE NOT INCOME AND NOT SUBJECT TO CHILD SUPPORT JURISDICTION OR IT WOULD CAUSE CHILD SUPPORT TO ACT IN A CRIMINAL LAW ENFORCEMENT CAPACITY WHICH IT IS NOT EMPOWERED TO DO SO.** I will also welcome official proceedings to investigate the matter unfortunately if opening that investigation finds Colston responsible she may stand trial for multiple federal crimes and if found guilty prison time. She is so one track minded all she sees is trying to hurt me not what shes doing to her. and prison that has not been my intention as I know she is mentally ill , and its not healthy for my children and simply as you can see by images attached cannot move past a failed relationship which I tried to escape and I am still trying to escape. She will not go away. She is obsessed with every job, every court settlement, she won't accept the IRS payments that would clear my arrears. Ms Carter , Charmaine Colston has tunnel vision for revenge only and is recklessly destroying the lives of every individual or agency that is attached to our cases. She doesn't care if you lose your job proof is that she didn't tell you that the auto case goes to trial November 14, 2024 Lake Charles City Court Case # 23-2124 and Mr Sterret, your legal counsel for the state, would back me up in telling you she lured you into writing a letter which would hold your agency liable, and you and your job in danger. I highly recommend that you make Charmaine Colston communicate with you in writing with no visits to your office as she is putting it on facebook as if it is your fault or that I somehow am evading justice for 1. She gets me fired multiple times and promises to do it again. 2. She caused my fall

and injury by making up a lie stating my son was dying and in emergency surgery and I needed to rush to Lake Charles which was an attempt for her to sleep with me.

I am expressing that Charmaine Colstonno longer be allowed to use the DCFS office as her personal bullying service and that on the record something be done about this continued abuse of power which is contributing to extremely tense, unhealthy and sometimes violent interactions and confrontations with friends, family, shouting matches at the DCFS office threats to the charter school board. We will get to the bottom of exactly the extent these abuses have been allowed to highlight the exact number of phone calls, texts, emails, acts of contempt by blatantly refusing court orders. I will no longer all Charmaine to continue to violate harassment laws by using the DCFS as an extension and tool to continue her terrorizing and down right despicable behavior; which has affected ny employability, caused injury to my nervous system and resulted in several surgeries and intense medical evaluations from the never ending 24/7 torment of the last 15 years. Please pay attention, as for as long as I was a victim to this woman's deranged advances for years there were no child support issues but ever since then you see repeated terminations and constant outside phone calls to employers who have affidavits, provided evidence of her phone calls which has at times tied up dispatch lines for an entire day costing them hundreds of thousands in production as no 18 wheelers could move or communicate while dispatch was tied up. I am sick of this and have contacted the authorities to conduct a full thorough investigation into how many times shes contacted family, friends, employers, law enforcement, judges, written my attorneys ex parte, and openly and definitely stated she won't obey Judge Mitchell Redd or Mr. She provokes and seeks violence by coercive control and refuses to leave my family alone and all members who she contacts via text phone and email are participating in this investigation and will be seeking permanent protective orders for themselves, their families and employers.

Ms Carter and Mr Sterret, I am writing to you on behalf of the best interest of my children minors Jayla King, John King Jr, and Jakai King. Over the case of this trial and support proceedings all of us including the DCFS headquarters have been subjected to an excessive amount of daily abuses by Charmaine Colston including but not limited to phone calls, emails, pop up visits, harassment, multiple case workers being put on the case. This does not even include the amount of continued stalking, slander, and calling employers which resulted in multiple terminations. I have signed affidavits from coworkers the last 13 years each highlighting violent incidents where Colston's behavior has and continues to affect my employment opportunities. My health and work history are plagued by excessive non stop texting phone calls, showing up on job sites, she has even contacted over 300 different coworkers at different extensions at the best employer I ever had in New York. Resulting in an investigation and my ban from Banker Steele projects. They have provided recordings of her numerous and excessive phone calls saying I don't take care of my kids, saying I beat her, saying I needed to lose my job to the point where law enforcement has had to become involved on multiple occasions. Colston during this investigation has and continues to engage in cyberstalking crimes where she has hacked the

google emails , text, illegal gps tracking, hacking multiple apps to forward myself and family members texts to her phone. She then pretends as though she “obtained” these texts from family. I am writing to warn this will not be tolerated anymore and I have taken appropriate action with the appropriate agencies to free myself from this psychological bondage of this clearly mentally disturbed fatally attracted individual. I ask only that she not use your offices as a tool as an extension of her abuse and harassment. The threats she makes to Ms Carter and multiple falling outs at the DCFS office is sickening. It's disgusting what you all have to endure and even more disgusting that her actions have caused to me financially, mentally and emotionally there are existing court orders that prevent her from slandering me and my family but as you can see form below she not only slanders me but is telling the public it is your offices that are responsible.

It is the duty of DCFS to act non biased, legally in accordance with the law so that if and when this investigation proceeds DCFS is not found to have aided this monster and any violent consequences that result from her threats and erratic behavior. I have worked and been respectful to my caseworkers at DCFS. It is Colston who bombards your office daily with emotionally uncontrolled tantrums. If this is what she's doing in broad daylight, imagine what I'm experiencing behind closed doors that are disrupting my medical care, licensing, and treatment. She has refused child support payments in the past on multiple occasions to the point where I no longer trust or know which method is legally binding at the moment. The state law says she is entitled to all $21,000.00 of my unpaid tax returns this would clear all arrears but Colston doesn't want the money she wants my drivers license suspended, she wants my credentials revoked she is bitter and scorned for no reason over a failed relationship from five years ago that she herself in writing ended and said she was involved sexually with other men and women and since then has withheld my children, stalked, stolen vehicles, committed SEC and insurance fraud, continues act in a way that is increasing felony level harassment charges as she is now putting my wifes face and name on her facebook page. Along with slander and harassment of my family, parents and grandparents. What does any of this have to do with my children? (please read below)

In accordance with state law, both parents must legally comply and both employers must be contacted. I am requesting that my civil rights by matter of procedure be upheld and that her employer at Homsi in Lake Charles Louisiana be sent a letter just as you willingly send letters to whomever she demands without proof that the income of Charmaine Y Colston be provided to the DCFS office. Address: Homsi's Tobacco and Beer 2612 Kirkman Street, B, Lake Charles LA 70601 as you can see from the facebook posts she is admitting to working there committing perjury as Mr Sterret witnessed her on the stand under oath say she doesnt work there and hasn't been employed there. The children are entitled to equal share of both parents' incomes and I am entitled to fair calculations.

Additionally Charmaine Colston has participated in criminal activity one of which is the stealing of my automobile and this case is ongoing. As you know Charmaine Colston is legally prohibited from benefiting financially from any crime she willingly participated in for the sole purpose of financial gain and indemnity is NOT a source of income. (Ex state farm replacing a stolen or damaged work car or piece of equipment) if it is found she committed a crime with the strategy to increase her revenue and did in create capital gains she will be prosecuted by the insurance company from which she benefitted from which will result in felony criminal charges as both State Farm and The Hartford are entitled to recourse. Once DCFS is made aware that she stands to gain from criminal activity there is protocol and procedure to take action so that the state agency does not unintentionally interfere in either criminal, or federal laws which would then pull Ms Charde Carter and the Lake Charles office into the trials initiated by the insurance groups. This would allow the state to be named defendant if they ordered a crime to be committed by omission. I assure you that the insurance company will without a doubt be investigating if Colston stands to benefit by manipulating a government agency to aid in her crimes while knowing full well the proceedings are open and ongoing as her own attorney attended the proceedings on April 21, 2024 and will also be called as a witness.

I have supplied links to the case numbers attached for your office to review and consult with legal counsel. Colston nor DCFS have justification to violate my civil rights and action to indemnify me so that I may obtain transportation to feed my children. A driver's license and transportation are required to feed my children. I do not wish to have Ms Carter, the Lake Charles DCFS office, Mr Sterret or others subject to federal investigations as you know for example arsonists cannot benefit from the structure they burned down for the insurance money. Similarly the insurance company will seek damages from Colston as she cannot benefit financially from a car she stole and to my knowledge there are cases in existence where the Louisiana Supreme Court has ruled on this.

I am tired of Colston and exhausted from her 15 years of unending stalking manipulation and refusal to make my children's needs a priority. I desire to provide unlimited financial means for my children, I always have. If I were a different gender the abuse would be bold and non deniable but since this is not the case I've had to go to a federal level to seek protection for myself, my family, my children and yes protections for the DCFS office and their employees as we were all sick of hearing from her. If this were about money she would open the letters from the IRS sent to her at her Country Club Road address and release the $21,00.00 held in tax returns. All it takes is me carrying one child, she carries the other two and nearly $21k -$24 K will fall into the DCFS account and we will all be free of her. But no she doesn't want the money, she says she earns over $50k per year and is above the system and no one can stop her not the Judge Redd, not DCFS, not Mr Sterrett she doesnt want money so please exercise discretion why is she terrorizing me if Im fighting for my children and fighting to get transportation to provide for them.

Please refer to the following criminal case numbers
Calcasieu Parish - Case criminal case # 2021-00123665
Lake Charles City Court - Case # 23-2124
(Charge;Statute 14: 67.26. C(2)- * Theft of a motor vehicle between five thousand and twenty five thousand dollars)
Charge (Statute 14:72.A) Forgery

It is important that Ms Carter refer this case to the legal department and seek protections for herself by redacting any letters she sent out that would imply the agency's reach would supersede any court rulings and criminal investigations. My intention is not to have anyone else harmed unknowingly like Colston did to Renee Amos. She convinced Renee Amos to commit a crime and as a result Renee Amos is on trial for Colston's actions and deceit. Ms Carter this isn't a case about a "poor single mother" this is a criminal. I have suffered loss of employment and financial losses as a result of this crime and I do not want decent people's jobs to be hurt.

Coming after my drivers license and my right to have work transportation is not about money it's an attempt to keep me handicapped from being unable to earn income. She knows I had to declare bankruptcy and when she got me fired my car was repossessed. THIS ALL IS INTENTIONAL LOOK AT THE FACEBOOK BRAGGING! SHE WILL INTENTIONALLY MAKE ALL OF YOU LOSE YOUR JOBS PLEASE HEED THE WARNING OF THIS LETTER AND MAKE YOUR SUPERIORS AWARE SO THAT THEY MAY ESCALATE IT. Because the insurance companies lawyers will have to investigate the beneficiary of these dealings and if it is found that Coslton was involved it will open a can of worms unnecessarily. I want only to heal from my surgeries, no longer be susceptible to stroke from harassment, buy my work car and use it to provide for my children.

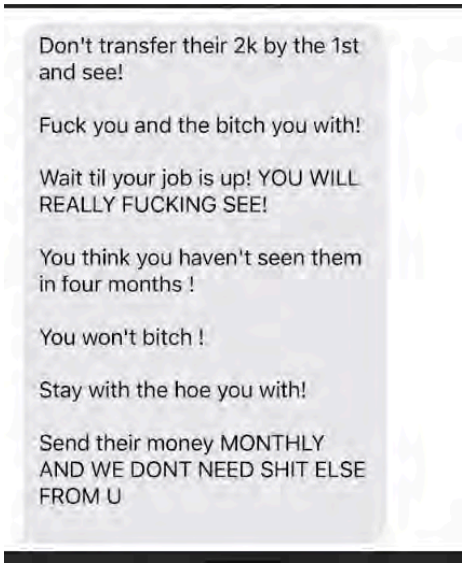
Examples Below and Thank You
John C King Sr.

1. Link Child Support Payments :https://docs.google.com/spreadsheets/d/1BuQcTOiXrdlEquP4TqxJqgwFLiDjqczbRxGqas0d26Q/edit?usp=sharing
2. May 25 2024 Stipulated Judgement https://drive.google.com/file/d/1ABusjfytIrVy0oB2Y9GRPieXZc5H69h3/view?usp=sharing

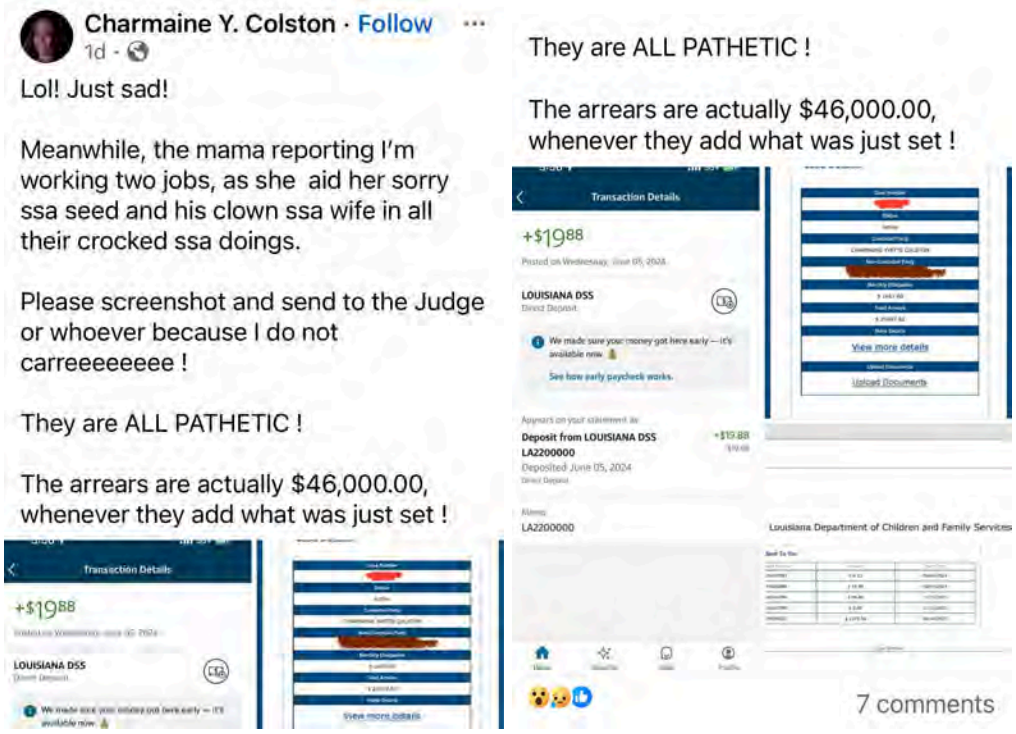
    - Provided OFW App correspondence where i've offered to pay her and she refused the payments.

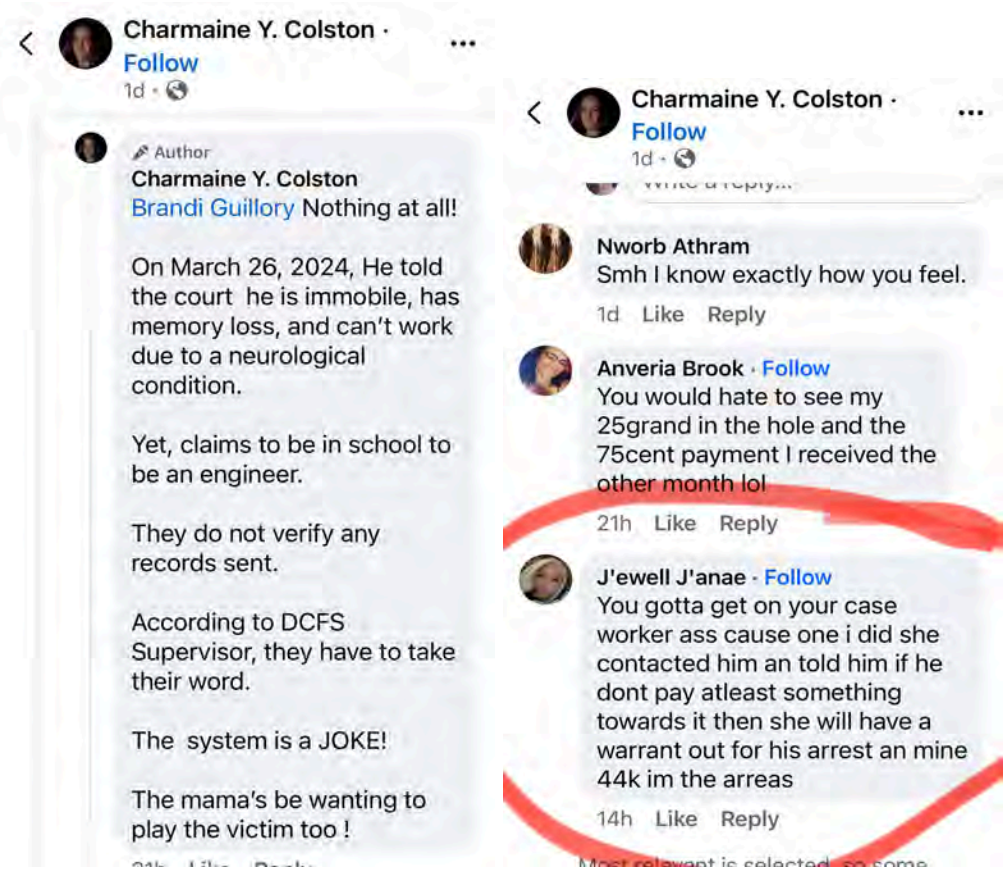
- Has stated in courts that the payments on the child support register are gifts
- Continues to lie about the current stipulated judgment she does not know nor will she be owed $46,000.00 when the judgment you read clearly says $24,000.00 total. Everything is a trick with her. I provided my income last year was $30K and the year before $15 k ive paid her almost $55k for 2021, 2022, and 2023 so what kinda math would entitle her to $46K more dollars? The hell is ongoing and never ending and she will not stop pursuing me and my family and harassing my wife calling her “itches” in writing to hundreds of ppl this is evidence she is attempting to use your agency instead of allowing the courts to exercise justice and should be banned from your office until investigations and all litigations are complete on all state and federal levels.

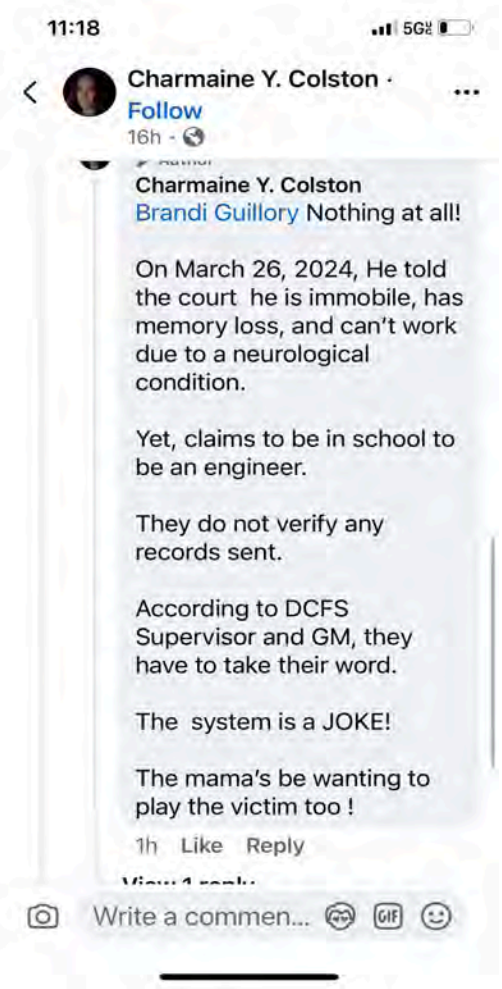
3. Text threatening to call my next job and get me fired again



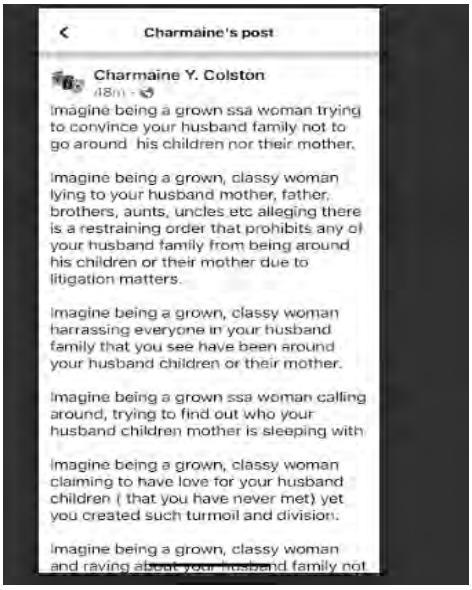
4. Facebook threats June 2, 2024 concerning DCFS OFFICE AND MS CARTER THE CASE WORKER AND CHILD SUPPORT

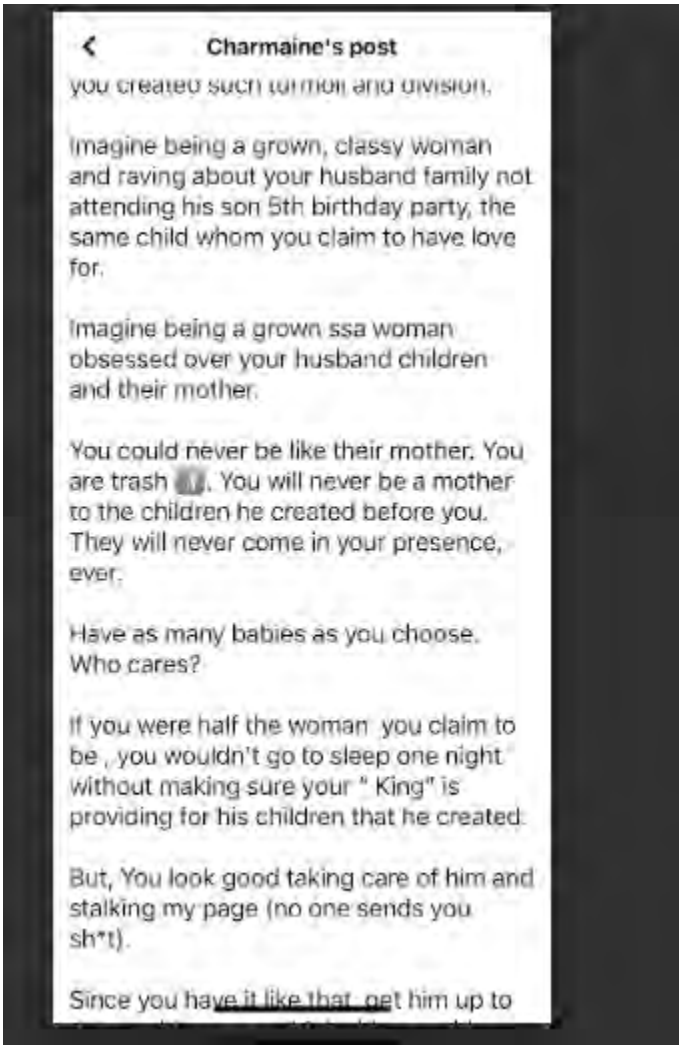

Charmaine Y. Colston · Follow
1d -
Lol! Just sad!
Meanwhile, the mama reporting I'm working two jobs, as she aid her sorry ssa seed and his clown ssa wife in all their crocked ssa doings.
Please screenshot and send to the Judge or whoever because I do not carreeeeeeee !
They are ALL PATHETIC !
The arrears are actually $46,000.00, whenever they add what was just set !
Transaction Details
+$1988
LOUISIANA DSS
Direct Deposit
We made sure your money got here early — it's available now.
See how early paycheck works.
Deposit from LOUISIANA DSS
LA2200000
Deposited June 05, 2024
+$19.88
LA2200000
View more details
Upload Documents
Louisiana Department of Children and Family Services
They are ALL PATHETIC !
The arrears are actually $46,000.00, whenever they add what was just set !
7 comments

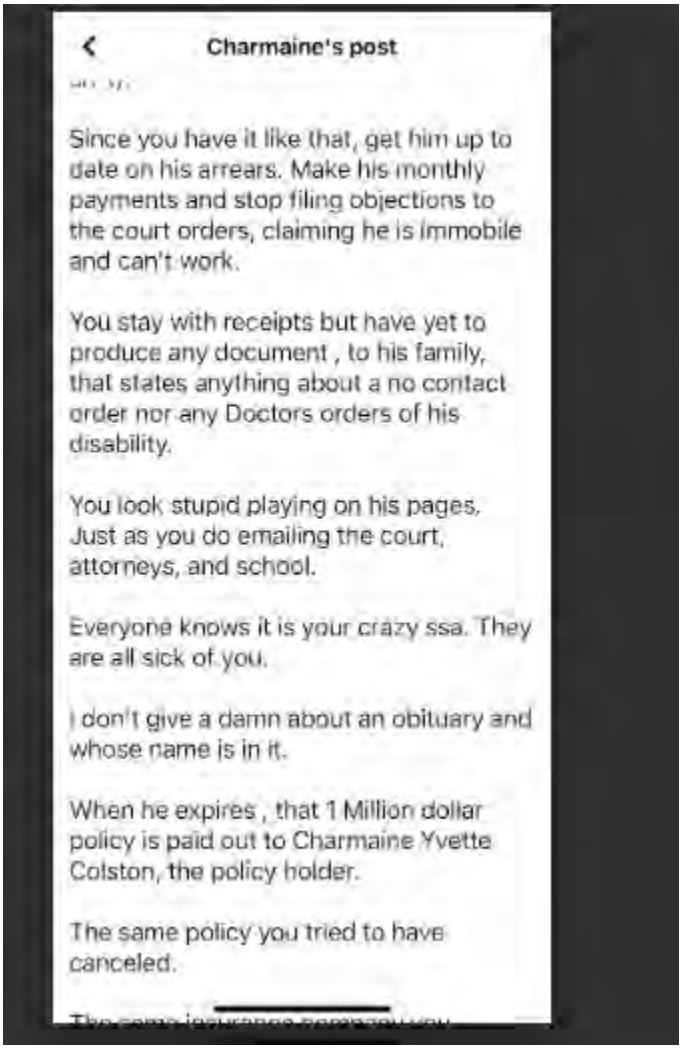

Charmaine Y. Colston ·
Follow
1d ·
Author
Charmaine Y. Colston
Brandi Guillory Nothing at all!
On March 26, 2024, He told the court he is immobile, has memory loss, and can't work due to a neurological condition.
Yet, claims to be in school to be an engineer.
They do not verify any records sent.
According to DCFS Supervisor, they have to take their word.
The system is a JOKE!
The mama's be wanting to play the victim too !
Charmaine Y. Colston ·
Follow
1d ·
Nworb Athram
Smh I know exactly how you feel.
1d Like Reply
Anveria Brook · Follow
You would hate to see my 25grand in the hole and the 75cent payment I received the other month lol
21h Like Reply
J'ewell J'anae · Follow
You gotta get on your case worker ass cause one i did she contacted him an told him if he dont pay atleast something towards it then she will have a warrant out for his arrest an mine 44k im the arreas
14h Like Reply

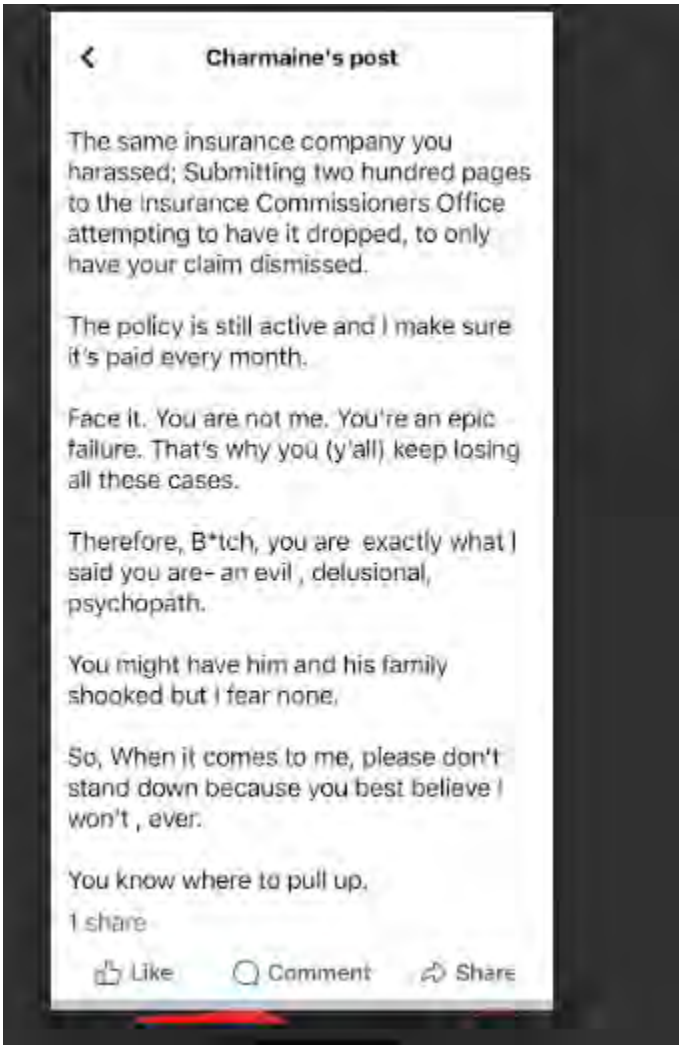


5. Facebook Threats/Slander of DCFS and Judge Redd Nov23-May24
    - Colston implies that the DCFS office is somehow communicating and siding with her abuse and harassment and no one has the power to stop her.


Charmaine's post
Charmaine Y. Colston
48m
Imagine being a grown ssa woman trying to convince your husband family not to go around his children nor their mother.
Imagine being a grown, classy woman lying to your husband mother, father, brothers, aunts, uncles etc alleging there is a restraining order that prohibits any of your husband family from being around his children or their mother due to litigation matters.
Imagine being a grown, classy woman harrassing everyone in your husband family that you see have been around your husband children or their mother.
Imagine being a grown ssa woman calling around, trying to find out who your husband children mother is sleeping with
Imagine being a grown, classy woman claiming to have love for your husband children (that you have never met) yet you created such turmoil and division.
Imagine being a grown, classy woman and raving about your husband family not


Charmaine's post
you created such turmoil and division.
Imagine being a grown, classy woman and raving about your husband family not attending his son 5th birthday party, the same child whom you claim to have love for.
Imagine being a grown ssa woman obsessed over your husband children and their mother.
You could never be like their mother. You are trash [redacted]. You will never be a mother to the children he created before you. They will never come in your presence, ever.
Have as many babies as you choose. Who cares?
If you were half the woman you claim to be , you wouldn't go to sleep one night without making sure your " King" is providing for his children that he created.
But, You look good taking care of him and stalking my page (no one sends you sh*t).
Since you have it like that, get him up to


Charmaine's post
Since you have it like that, get him up to date on his arrears. Make his monthly payments and stop filing objections to the court orders, claiming he is immobile and can't work.
You stay with receipts but have yet to produce any document , to his family, that states anything about a no contact order nor any Doctors orders of his disability.
You look stupid playing on his pages. Just as you do emailing the court, attorneys, and school.
Everyone knows it is your crazy ssa. They are all sick of you.
I don't give a damn about an obituary and whose name is in it.
When he expires , that 1 Million dollar policy is paid out to Charmaine Yvette Colston, the policy holder.
The same policy you tried to have canceled.


Charmaine's post
The same insurance company you harassed; Submitting two hundred pages to the Insurance Commissioners Office attempting to have it dropped, to only have your claim dismissed.
The policy is still active and I make sure it's paid every month.
Face it. You are not me. You're an epic failure. That's why you (y'all) keep losing all these cases.
Therefore, B*tch, you are exactly what I said you are- an evil , delusional, psychopath.
You might have him and his family shooked but I fear none.
So, When it comes to me, please don't stand down because you best believe I won't , ever.
You know where to pull up.
1 share
Like
Comment
Share



6. Facebook harassment continued….



Charmaine Y. Colston
13h ·

Diesha Radasha · Follow
Reels · Jan 15 ·

I remember asking my counselor " What if I leave and he gives the next girl everything I ever asked for?" And she said something that'll forever stick with me! "What if someone finds you and they give you everything without even asking?" And a year later all is well. Never settle❤️

❤️Add me on TikTok to see a smidget of my story _DieshaRadasha

❤️https://www.facebook.com/share/r/E8rLEdZcqKDWaVka/?mibextid=PkCAf5

Diesha Radasha Follow



Charmaine Y. Colston · Follow
34m ·

Good Morning !

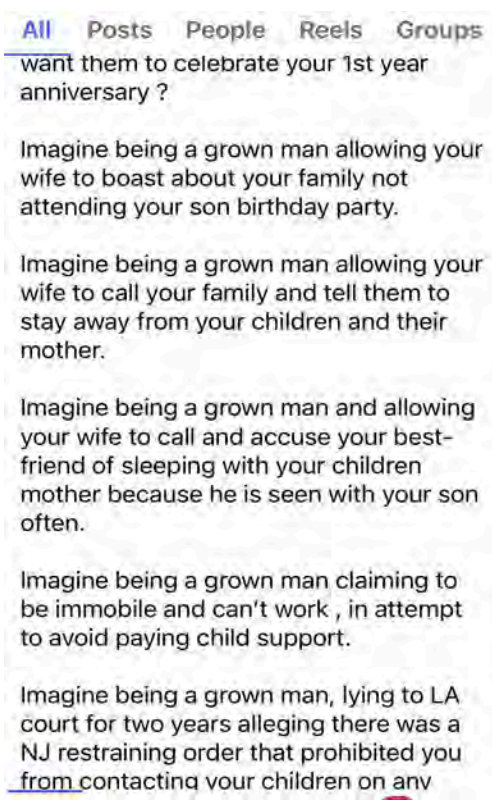
Thank you Father God for another day! Thank you for your protection, your grace, and your favor.

I ask in advance that you (God), The Judge, My Attorney, My Family , My Father N Law, My Children family , and MY FBF please forgive me for this lengthy post.

I try so hard to be meek and humble. Just as hard as I try to be still/ silent and better my ways/past.

I usually take the high road. I have done so for awhile now but the truth must be told.

I'll deal with the Judge next month; if the other party does not file a continuance and have it granted, again. 😊



All Posts People Reels Groups

want them to celebrate your 1st year anniversary ?

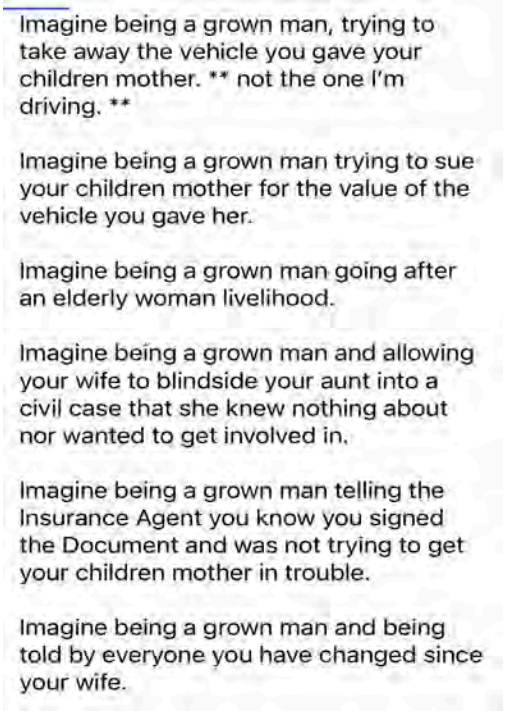
Imagine being a grown man allowing your wife to boast about your family not attending your son birthday party.

Imagine being a grown man allowing your wife to call your family and tell them to stay away from your children and their mother.

Imagine being a grown man and allowing your wife to call and accuse your best-friend of sleeping with your children mother because he is seen with your son often.

Imagine being a grown man claiming to be immobile and can't work , in attempt to avoid paying child support.

Imagine being a grown man, lying to LA court for two years alleging there was a NJ restraining order that prohibited you from contacting your children on any



Imagine being a grown man, trying to take away the vehicle you gave your children mother. ** not the one I'm driving. **

Imagine being a grown man trying to sue your children mother for the value of the vehicle you gave her.

Imagine being a grown man going after an elderly woman livelihood.

Imagine being a grown man and allowing your wife to blindside your aunt into a civil case that she knew nothing about nor wanted to get involved in.

Imagine being a grown man telling the Insurance Agent you know you signed the Document and was not trying to get your children mother in trouble.

Imagine being a grown man and being told by everyone you have changed since your wife.

Imagine being a grown man allowing your wife to act as you and email the court stating your children mother killed your children and she was admitted into a psychiatric institution.

Imagine being a grown woman , at your big age, creating multiple fake IG accounts to harass your husband children mother.

Imagine being a grown woman posting literally over 500 post regarding your husband , children mother.

Imagine being a grown woman stalking your husband children and their mother.

Imagine being a grown woman and inserting yourself in a matter that has never involved you.

Imagine being a grown woman pillow talking with a man about his children mother relationship history from sixteen

because your father in law loves his grandchildren mother and not you.

Imagine being grown woman portraying to have this so called relationship with your nlaws knowing they don't want anything to do with you.

Imagine being a grown woman and not telling your husband audience how many times your lunatic ssa have been told by your nlaws to stop contacting them.

Imagine being grown woman claiming to refuse to drag your father n law on facebook but disrespects him in private.

Imagine being a grown woman harrassing your mother n law and being the reason she totaled her vehicle.

More than a few things are clear here:

One being, Your husband is not a man and has not given up his childish ways.

Imagine being a grown woman pillow talking with a man about his children mother relationship history from sixteen years a go.

Imagine being a grown woman still stuck on what happened two years ago, after you harassed and provoked me.

Imagine being a grown woman thinking your idiotic plan was going to hold up in court.

Imagine being a grown woman who believes her own lies.

Imagine being a grown woman lying about being pregnant.

Imagine being a grown woman butt hurt because your father in law loves his grandchildren mother and not you.

Imagine being grown woman portraying to have this so called relationship with

are you happy thinking of me everyday? You email the court twelve page letters every damn day. You think your behavior is normal?

You are a fan, admit it. What is it about me that has you hooked?

If you wanted to be my friend, you should have said that. I don't hold grudges but I don't play with b*tches either. With that said, You have broken the camels back.

You don't want to be cordial. You like discord.

You are jealous of me for whatever reason. I don't want your man. That's why you have him.

You're welcome.

You want him and his family to despise me so bad.

You are really sick and it is very

Two, You are not a woman , you are evil, a narcissist, manipulative, unstable, spiteful, overbearing, envious, and controlling.

Three, you need to see a psychiatrist , immediately.

Four, you seek validation/love and appear to have a deeper issue embed.

Five, you choose to live in the past and keep confusion going.

In October of 2021, The Hearing Officer advised to move forward with a clean slate. That wasn't good enough for you.

Six, You are a joke and I am a force to be reckoned with.

Unlike you, I don't have to speak from a fake page nor someone elses page.

All Posts People Reels Groups

for them, who celebrates them. The invite was extended. They have me and plenty of family who loves, support and backs them, without your approval.

The only last name you should be concerned about is the one you write the childsupport check out to and that would be me, Colston. So that I may spend your money on my children. Since your husband can't keep a job.

Okay. I am done for real this time.

I put my faith in God and the system that everything will be taken care of him.

Justice will be served for me and my children.

God Bless,

Ms. Colston

1 comment

You are really sick and it is very concerning.

Your actions and hate for me is the very reason why you will never be around my children, ever in life.

Nothing will trump what I say.

Screen shot and send it to the court.

You need to stop stressing yourself trying to get a win, you won't.

Relax, you already lost all your edges.

I am convinced you both are on some sort of drug because who goes to this extent. How do you sleep?

In conclusion,

God blessed me with my children. I don't care who support them, who shows up for them, who celebrates them. The invite was extended. They have me and plenty

Charmaine Y. Colston

Posts About Videos More

Calling people to see if I am sleeping with them.

Lying to our nlaws telling them they can't be around me nor my children.

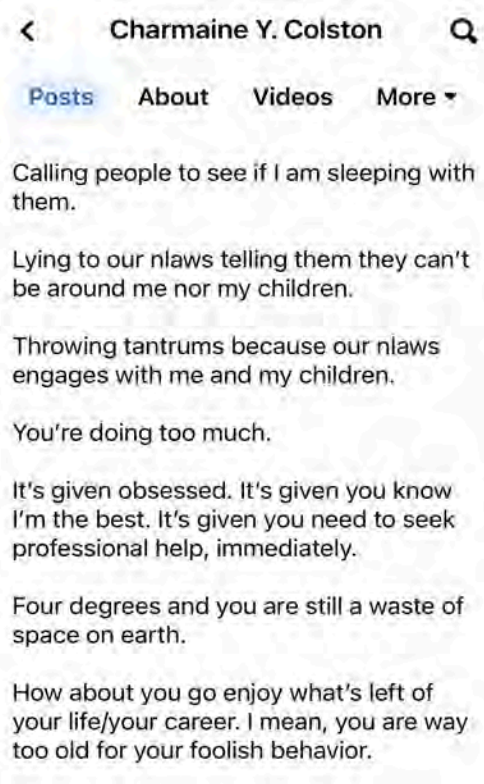
Throwing tantrums because our nlaws engages with me and my children.

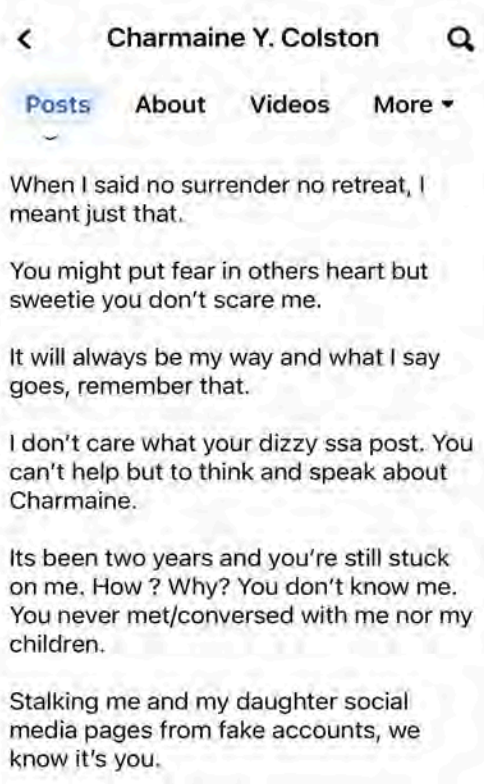
You're doing too much.

It's given obsessed. It's given you know I'm the best. It's given you need to seek professional help, immediately.

Four degrees and you are still a waste of space on earth.

How about you go enjoy what's left of your life/your career. I mean, you are way too old for your foolish behavior.


Charmaine Y. Colston
Posts
About
Videos
More
Calling people to see if I am sleeping with them.
Lying to our nlaws telling them they can't be around me nor my children.
Throwing tantrums because our nlaws engages with me and my children.
You're doing too much.
It's given obsessed. It's given you know I'm the best. It's given you need to seek professional help, immediately.
Four degrees and you are still a waste of space on earth.
How about you go enjoy what's left of your life/your career. I mean, you are way too old for your foolish behavior.


Charmaine Y. Colston
Posts
About
Videos
More
When I said no surrender no retreat, I meant just that.
You might put fear in others heart but sweetie you don't scare me.
It will always be my way and what I say goes, remember that.
I don't care what your dizzy ssa post. You can't help but to think and speak about Charmaine.
Its been two years and you're still stuck on me. How ? Why? You don't know me. You never met/conversed with me nor my children.
Stalking me and my daughter social media pages from fake accounts, we know it's you.


Charmaine Y. Colston
Posts
About
Videos
More
It's given obsessed. It's given you know I'm the best. It's given you need to seek professional help, immediately.
Four degrees and you are still a waste of space on earth.
How about you go enjoy what's left of your life/your career. I mean, you are way too old for your foolish behavior.
Nevertheless, I look forward to finally meeting you.
Like
Comment
Share
Charmaine Y. Colston
16h
What do you do when
Follow
Message

Mail weekly sent to my mothers house she goes to the post office and mails things to keep my mother and grandmother sick.
Charmaine does not recognize this behavior as insane or inappropriate seeing as though my wife has never met my children and has never even had a conversation with charmaine. This is years later after stealing the car and she does this and brags that there won't be justice for me or a punishment for her.

This is sick. This isn't a paramour this is a mentally disturbed individual and Ms Dominic should remain ethical when dealing with victims. I hadn't seen Charmaine colston in person in 13 months at time of car theft so how is that a paramour? I was married and living with my wife. It's more lies this is the harassment contributing to my seizures and paralysis and to discriminate against my gender is unethical and slander.



9:21 49%

← Replies

Replies to Tyria's comment on your post

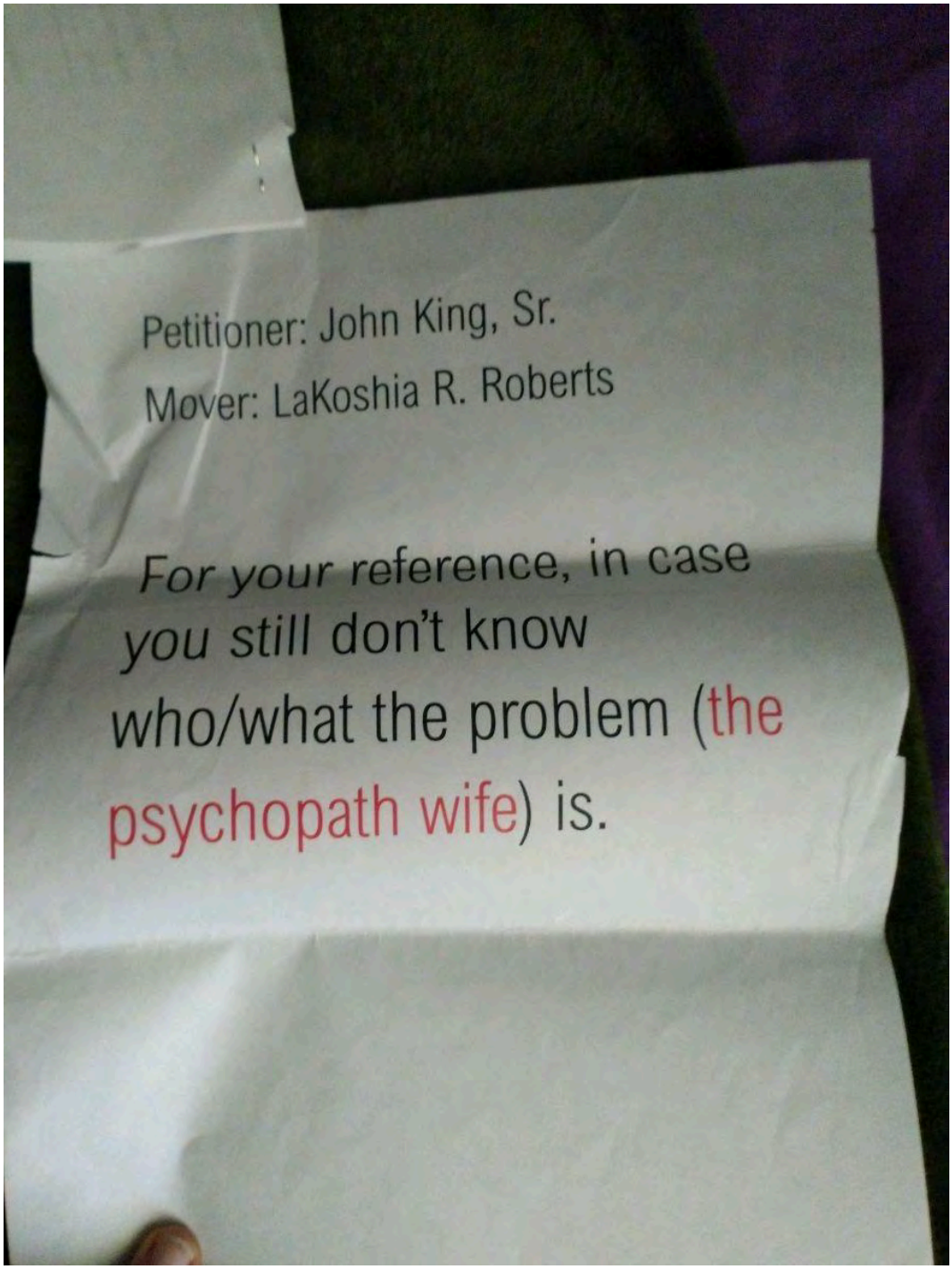
Tyria Guillory
I don't agree with him on make it work that is not good for a women or man that only wants control and not have a relationship for the kids. My nephew stayed with his kids mother regardless to the mental and physical abuse that he was hiding from his family. She cut him, burned him, she it him in the head with an object that left him with seizures. you have to do what is best for you, especially i... See more

7h Like Reply 1

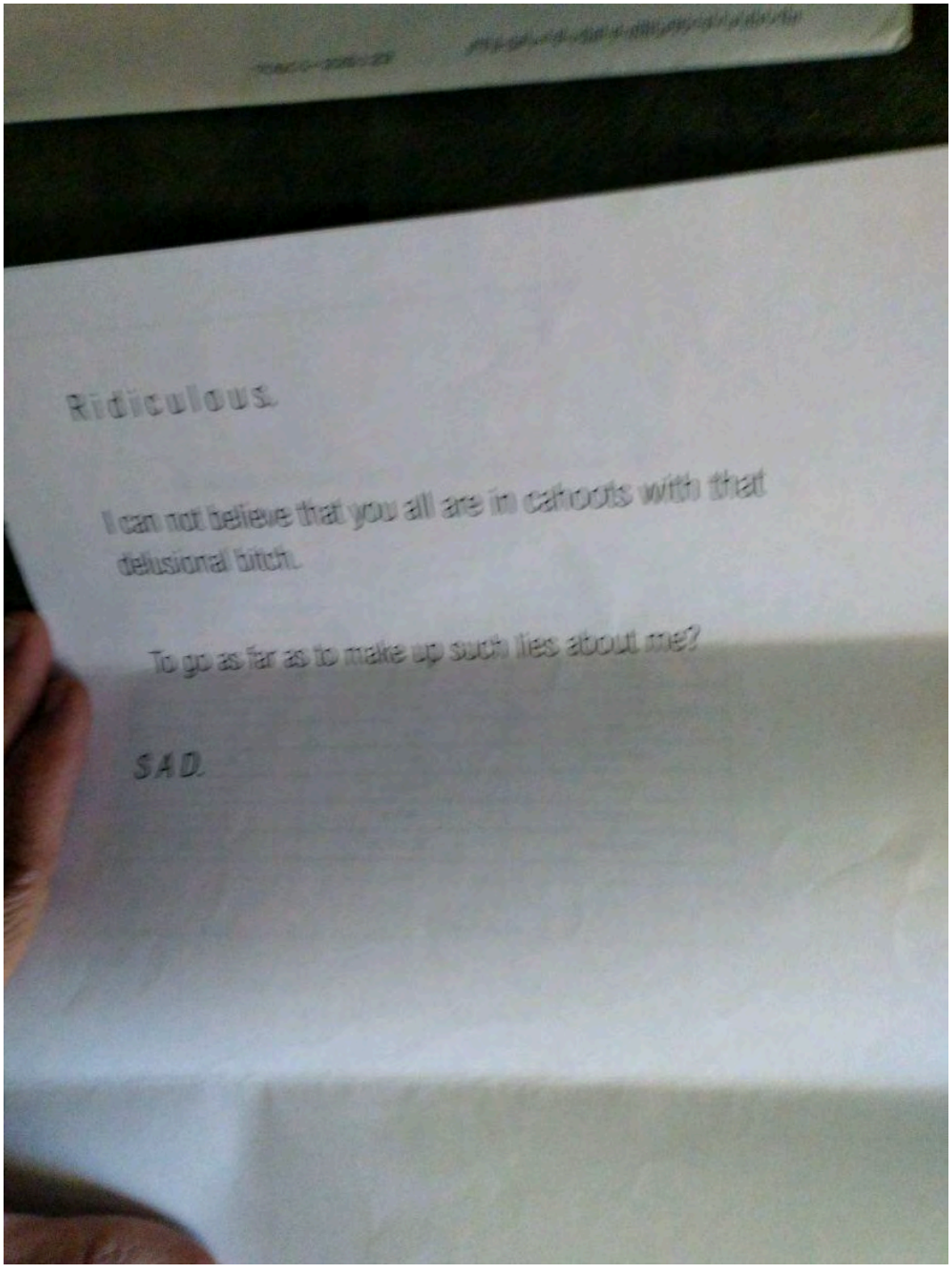
King Tay
Tyria Guillory I would settle for just keeping my photos, name, my likeness , my husbands god baby photos, shoot just don't post anyone that isn't posting you.

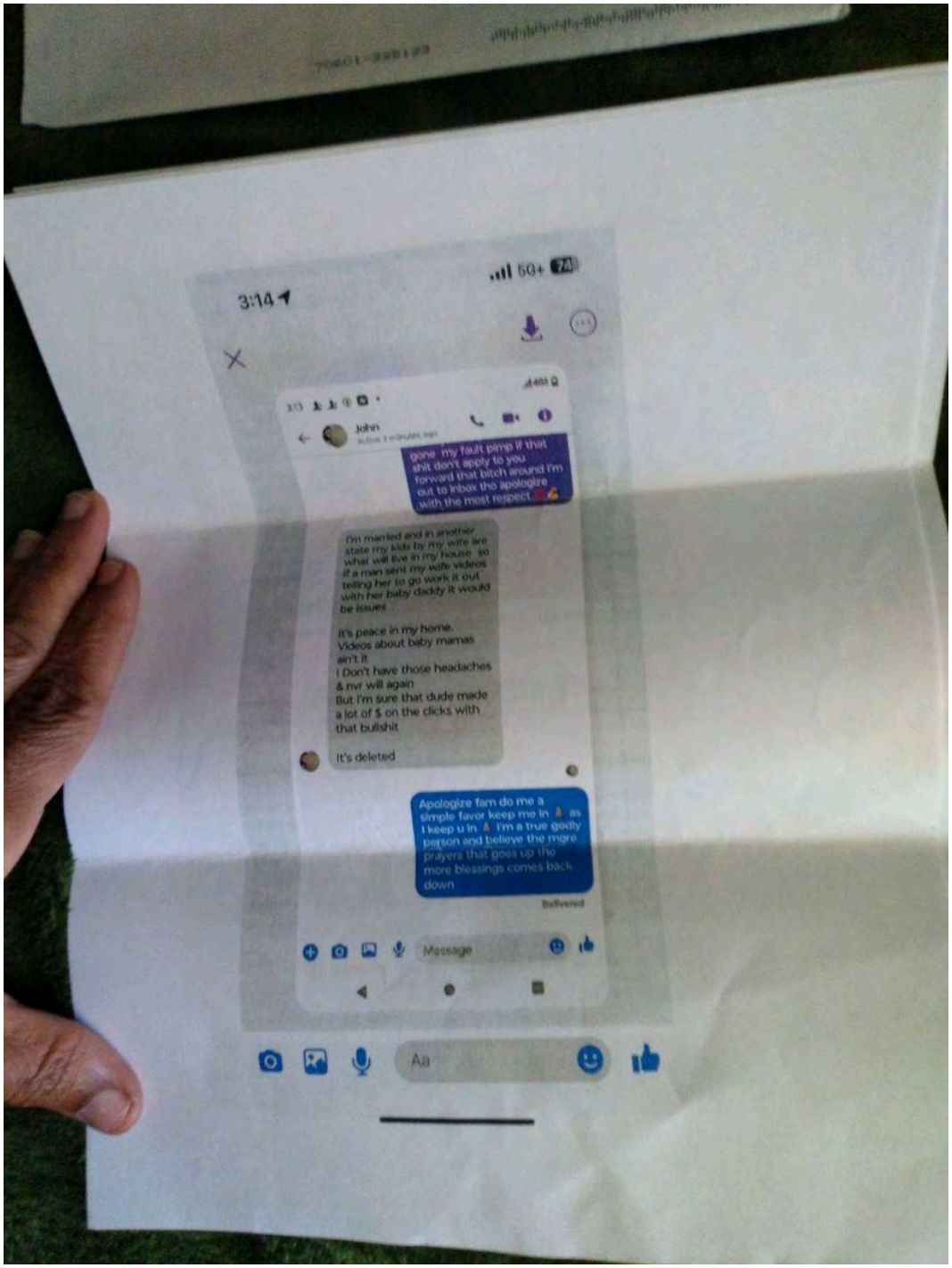
Or you will be subpoenaed to court if you deal with them and lose money off work...
-OR you will be accused of harassment. She gonna initiate every text, email, and mail stuff to your house "good morning ALL", as if you got a wedding ring t... See more

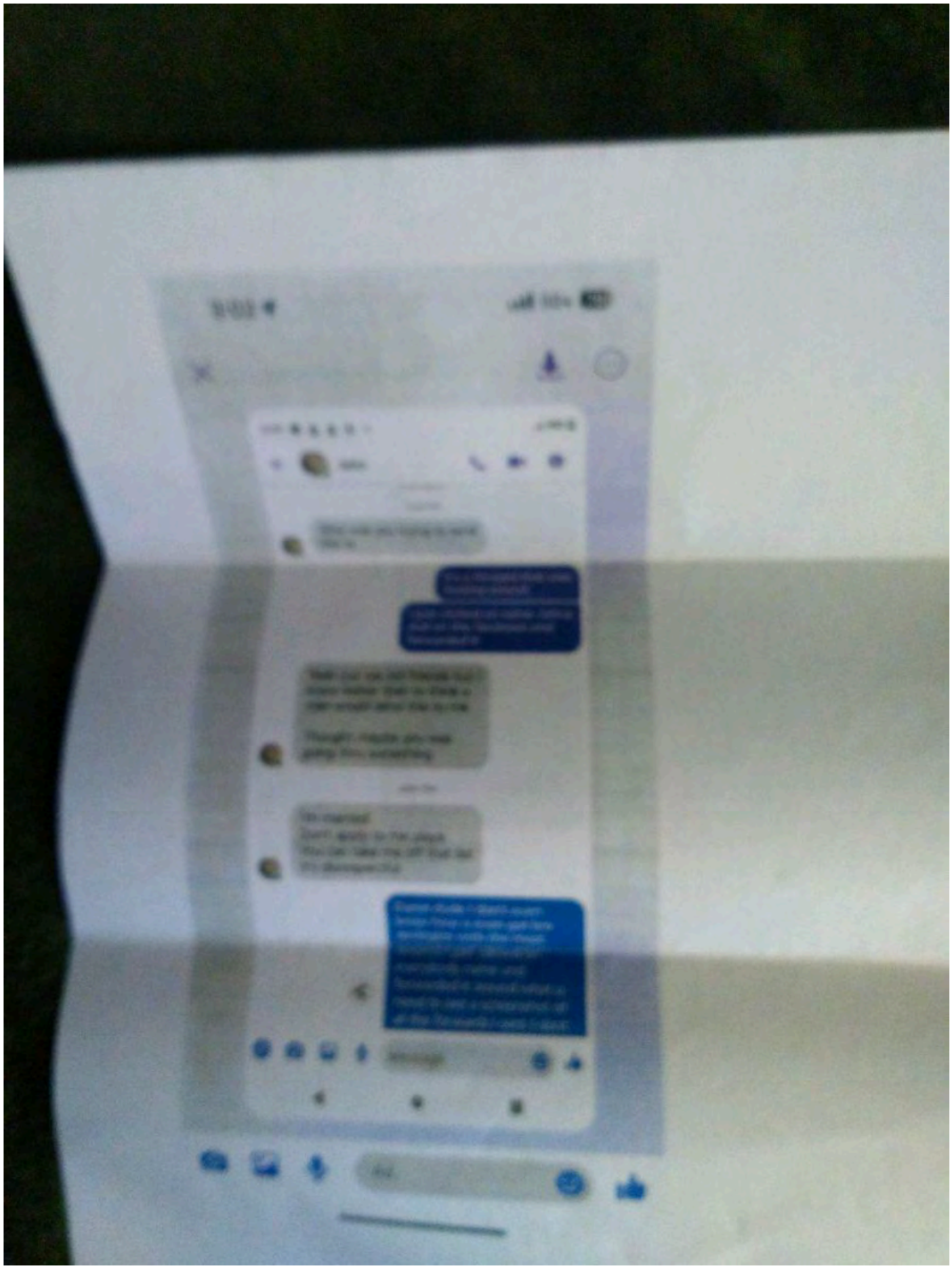
23m Like Reply


Petitioner: John King, Sr.
Mover: LaKoshia R. Roberts
For your reference, in case you still don't know who/what the problem (the psychopath wife) is.


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
821 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123


Ridiculous.
I can not believe that you all are in cahoots with that delusional bitch.
To go as far as to make up such lies about me?
SAD.


3:14
5G+
John
gone my fault pimp if that shit don't apply to you forward that bitch around I'm out to inbox tho apologize with the most respect
I'm married and in another state my kids by my wife are what will live in my house so if a man sent my wife videos telling her to go work it out with her baby daddy it would be issues
It's peace in my home. Videos about baby mamas ain't it
I Don't have those headaches & nvr will again
But I'm sure that dude made a lot of $ on the clicks with that bullshit
It's deleted
Apologize fam do me a simple favor keep me in 🙏 as I keep u in 🙏 I'm a true godly person and believe the more prayers that goes up the more blessings comes back down
Delivered
Message
Aa




King
921 Moss St.
Lake Charles, La 70601
BATON ROUGE LA 707
19 JUL 2024 PM 1 L
FREEDOM
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123


King
821 Moss St.
Lake Charles, LA 70601
BATON ROUGE LA 707
7 AUG 2024 PM 3 L
FREEDOM
Monica King Guillory
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123




BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
821 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123

5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.

Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail



January 29, 2026

NOTICE OF HEARING

JOHN KING, SR.
vs. 2021-2773
CHARMAINE COLSTON

State of Louisiana
14TH Judicial District Court
Clerk of Court: H. LYNN JONES, II

Attorneys:
ORELIA LAWDINS-TRENT
JOHN KING, SR., PRO SE

NOTICE sent VIA EMAIL ONLY to all counsel as per LA C.C.P. Art. 1313(C)

THE ABOVE CASE HAS BEEN ASSIGNED TO

AD HOC JUDGE H. WARD FONTENOT

VERIFIED MOTION TO RECUSE

HAS BEEN SET FOR:
FEBRUARY 10, 2026 @ 9:00 A.M.

ALL PARTIES ARE DIRECTED TO FOLLOW RULE 9.9 OR 9.10 OF THE UNIFORM DISTRICT COURT RULES CONCERNING FILINGS OR MEMORANDA AND AFFIDAVITS.

ALL PARTIES MUST SEND LETTERS, PRE-TRIAL MEMOS, AND OTHER COMMUNICATIONS ELECTRONICALLY TO
bistre@14jdc.org
FILE ORIGINAL IN RECORD

Direct all inquiries to:
Breanne Istre @ bistre@14jdc.org
Telephone Number (337) 721-3100, Ext. 6406

Re: LAKE CHARLES CITY COURT pauper affidavit

From: True King <truekingfile@gmail.com>

To: baleigh@abshirelawfirm.com

Cc: Dustan Abshire <dustan@abshirelawfirm.com>, Krissy Dupre <krissy@abshirelawfirm.com>

Date: Wed, 29 May 2024 12:54:16 -0400

Hello,
It was filed before Dustan was retained and refiled once they said they didn’t receive it.

What doesn’t he mean “not happy” they’re the ones that told us no one had enrolled as counsel for the March date with Kami which is why we had to fly out there?

Not “happy”? As in “joy”? The standards required by the law for pauper were met as he is a pauper for Calcasieu parish he has no income . Zero. And has had two surgeries in last two weeks.

None of our emails to you guys about the matter received responses you were sent everything and you said Dustan would answer the questions he was just super busy we received no response.

Monica Abshire told John he had to refile and that at the time they had no attorney of record. What is this game ? She told us last week to refile and he has and how would he even know as the judge who filed it ?

None of this makes any sense cause a paper trail was kept of emails and faxes and no one provided any feedback .

We have reviewed the standards for Pauper and he meets the standard.

Please advise if we have instructions in writing how “feelings “ are coming into play? Seeking to understand as none of the pauper emails have responses and there hasn’t been any phone calls about the matter
Thank you

On Wed, May 29, 2024 at 10:37 AM <baleigh@abshirelawfirm.com> wrote:

> Lake Charles City Court called our office and spoke with me.
>
>
>
> They advised that the Judge is *not happy* with John filing the pauper
> application on his own, and wanted to inform you that once you have
> retained counsel, *all pleadings are to go through your counsel*.
>
>
>
> They also stated that John is *NOT PAUPER*. They require the original and
> the $5 transmission fee.

>
>
>
> *From:* True King <truekingfile@gmail.com>
> *Sent:* Tuesday, May 28, 2024 11:44 AM
> *To:* baleigh@abshirelawfirm.com
> *Subject:* Re: LAKE CHARLES CITY COURT pauper affidavit
>
>
>
> Good morning
>
> Because they’re dysfunctional. If Kamie files something it’s signed within
> 24 hours .they pick and choose . She said she is Asking Judge Richard for
> the confirmation.
>
>
>
> Give me two hours please .
>
> Juggling a lot thank you dear
>
>
>
> On Tue, May 28, 2024 at 12:33 PM <baleigh@abshirelawfirm.com> wrote:
>
> See attached.
>
> Also, I called their office twice. They told me that John IS NOT pauper. I
> am not sure what the confusion is.
>
>
>
> *From:* True King <truekingfile@gmail.com>
> *Sent:* Tuesday, May 28, 2024 10:59 AM
> *To:* baleigh@abshirelawfirm.com
> *Subject:* Re: LAKE CHARLES CITY COURT pauper affidavit
>
>
>
> Just spoke with Monica Abshire. She confirmed it’s been received. For no
> reason at all it’s just sitting there . Judge Richard has it and for no
> reason at all has not signed it yet. She says she will try to send him an
> email to process it today.
>
>

>
> Also can you send a copy of wte it is your trying to file so that we can
> read it before it is filed and so that we have a copy and know what’s going
> on please dear?
>
>
>
> Thank you
>
>
>
> On Tue, May 28, 2024 at 11:28 AM True King <truekingfile@gmail.com> wrote:
>
> Baleigh that is Not true it has been received and processed I will call
> them and let them call you we have the confirmation in writing it was
> received and processed
>
>
>
> On Tue, May 28, 2024 at 9:54 AM <baleigh@abshirelawfirm.com> wrote:
>
> I called Lake Charles City Court. Their office advised that Mr. King is
> not pauper and that they have not received a pauper application.
>
>
>
> I need Mr. King to provide our office with the $300 filing fee to be able
> to file the Supplementing Petition to include Hartford Insurance Company.
>
>
>
> *From:* True King <truekingfile@gmail.com>
> *Sent:* Tuesday, May 21, 2024 4:20 PM
> *To:* baleigh@abshirelawfirm.com
> *Subject:* LAKE CHARLES CITY COURT pauper affidavit
>
>
>
> Pauper affidavit processed again yesterday
>
>
>
> Received confirmation
>
>
>

> <truekingfile@gmail.com>
>
>
>
>
>
>
>
>
> Sent from my iPhone
>
>

Gmail

John King <johncjking86@gmail.com>

Parent Teacher Conference and Parent Pick up tomorrow

7 messages

John King <johncjking86@gmail.com> Thu, Sep 29, 2022 at 1:30 PM
To: "tcook1@lakecharlescharter.org" <tcook1@lakecharlescharter.org>
Bcc: "fit4thekings@gmail.com" <fit4thekings@gmail.com>, ijohncjking@gmail.com

PDF aredmon@14jdcfjc.org_20220913…

Good Afternoon Ms Cook,

This is John King Sr, writing to remind you that tomorrow is my court ordered custodial time with My son john king sr. My mother Monica Guillory is the assigned pick up person via court order. Charmaine Colston his mother shares “joint” custody not sole custody and is the “domiciliary parent” not the custodial parent. She has been presenting challenges and blocking custodial time. The judge and hearing officer told me in writing see attached that I am instructed to pick my children up from school tomorrow Sept drop them off on Monday morning.

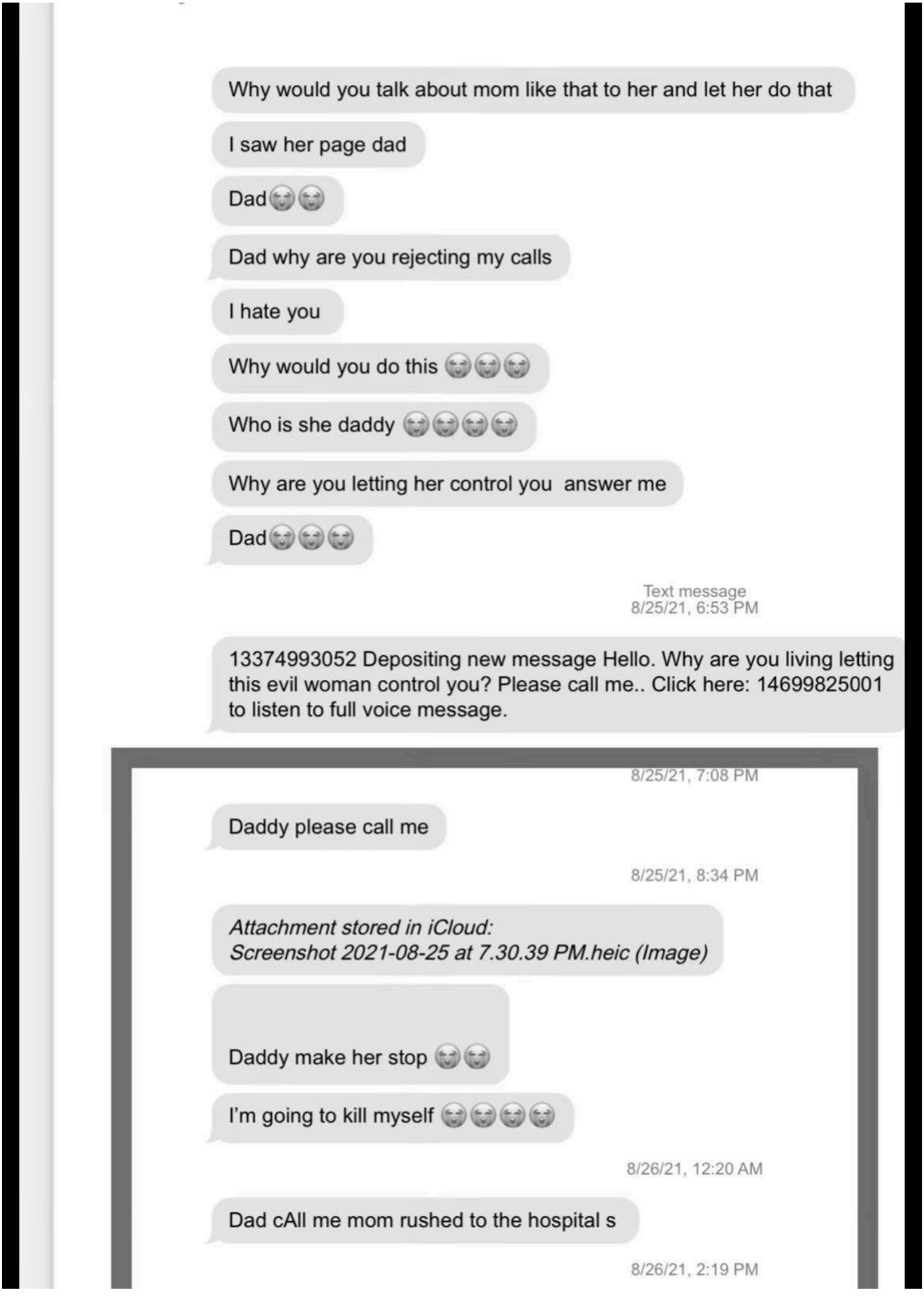
I want to be certain this is meaningful time spent with my children as she is constantly trying to block me from seeing them and she has an active restraining order from Nj which prevents her from knowing my whereabouts and showing up on the same campus at same time as me or contacting me directly. I want to provide these court orders attached and restraining orders so that tomorrow goes smoothly.

Is there anything you can advise as to how to avoid her high conflict behavior and avoid her being in the school office same time as me? Is there someone who can be alerted to aid with this? I am trying my hardest to get to my children but as you can see attached I don’t want issues at the school. The court orders and restraining orders are attached and that’s all that is needed to pick up my children.

Thank you
John King Sr
318-995-1705

Please advise John King Sr
(Enclosed restraining orders and court orders)


46
Colston.charmaine89@gmail.com
We will rise without you
Just dont know how close i am to pulling the fucking trigger!
I HATE YOUR ASS!!
BITCH
So serious !


Why would you talk about mom like that to her and let her do that
I saw her page dad
Dad😡😡
Dad why are you rejecting my calls
I hate you
Why would you do this 😡😡😡
Who is she daddy 😡😡😡😡
Why are you letting her control you answer me
Dad😡😡😡
Text message
8/25/21, 6:53 PM
13374993052 Depositing new message Hello. Why are you living letting this evil woman control you? Please call me.. Click here: 14699825001 to listen to full voice message.
8/25/21, 7:08 PM
Daddy please call me
8/25/21, 8:34 PM
Attachment stored in iCloud:
Screenshot 2021-08-25 at 7.30.39 PM.heic (Image)
Daddy make her stop 😡😡
I'm going to kill myself 😡😡😡😡
8/26/21, 12:20 AM
Dad cAll me mom rushed to the hospital s
8/26/21, 2:19 PM


Dad
Daddy please call me
8/26/21, 4:24 PM
Dad I have been calling , why are you letting this crazy lady keep yo
from us
8/26/21, 6:08 PM
Dad
Daddy please call me
8/26/21, 7:50 PM

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART
COUNTY OF ESSEX

FAMILY
N057
004
JUGBELA

****

STATE OF NJ , PLTF

VS

COLSTON CHARMAINE Y , DEFN

NOTICE OF

ARRAIGNMENT

DOCKET NO.(s):
FO-07-000131-22-F

JOHN C. [redacted] (K0196514)
50-[redacted]

Dear Litigant:

REMOTE ARRAIGNMENT IS SCHEDULED FOR 12:15 P.M ON MARCH 04, 2022 WITH HONORABLE JOHN ZUNIC. YOU MUST ATTEND VIA VIDEO AS SCHEDULED. PLEASE CONTACT THE COURT FOR FURTHER DETAILS.

QUESTIONS ABOUT THIS NOTICE???
CONTACT OFFICE DOMESTIC VIOLENCE, AT 973-776-9300 EXT.56616
BRING THIS NOTICE WITH YOU WHEN YOU APPEAR

DATED: 02/14/22

KESHA MANNING
DIVISION MANAGER, FAMILY PART

REFER TO ABOVE DOCKET NUMBER(S) ON ANY INQUIRES IN THIS MATTER

***PLEASE NOTIFY COURT OF DISABILITY ACCOMMODATION NEEDS ***
*** CALL THE NUMBER LISTED ABOVE THIS MESSAGE ONE WEEK IN ADVANCE IF YOU NEED AN INTERPRETER ***
Llame al numero que figura arriba de este mensaje con una semana de anticipacion si necesita un interprete.

(REV.03/00)

Gmail - Mr Shea evidence of abuse,...

Thank you

FOURTEENTH JUDICIAL DISTRICT COURT
LAKE CHARLES, LOUISIANA

[redacted]

6

parties. And given the age of the two older children, they are certainly welcome to call their father at any time. I don't believe there is objection to that.

MS. TRENT: There is no objection to that, Your Honor; that is correct. Further, the pick-up and drop-off for the summertime -- the pick-up will be from a safe spot which will be a police station that is designated by the court. And since our review will be some time in November during the school year, the children will be picked up directly from the school by Mr. King or one of his agents.

MR. HAWKINS: Again, Your Honor. For the purpose of clarification, pick-up and drop-off for the summer will take place at the Lake Charles Police Department in the safe exchange zone which is monitored by the police. Visitation for the summer -- excuse me for school will take place in accordance with the stipulation from the school with Mr. King or one of his relatives that are duly designated -- Ms. King, excuse me, Ms. Colston is to instruct the school that someone's allowed to pick the children up. Usually there's an authorized pick-up/drop-off. Mr. King will provide the name of the person that's coming, if it's not him. We also have agreed that there is an effectuation clause that if for some reason the children are not able to be picked up or dropped off at

that point, the party that is picking up or dropping off can utilize the Lake Charles Police Department and/or the Calcasieu Parish Sheriff to facilitate an exchange. Hopefully that will not be necessary, but --

MS. TRENT: That is correct, Your Honor. In addition to that, I believe some housekeeping matters

JACLYN ISTRE, CCR
OFFICIAL COURT REPORTER
FOURTEENTH JUDICIAL DISTRICT COURT
LAKE CHARLES, LOUISIANA

On Thu, Sep 8, 2022 at 6:01 PM John King <johncjking86@gmail.com> wrote:

> Mr Shea,
>
> Please see where Ms Lawdins lied again it says here and she agrees that there will be school pickups she twisted her words to say it was discussed. Is the transcript honored or is it not? Who is doing the deciding as to which sentences are honored the

--

J.C.J. King

3 attachments



IMG_2085.jpeg
147K



IMG_2087.jpeg
240K

06.08.2022 Amended TRO 817-22.pdf
214K

Tammey Cook <tcook1@lakecharlescharter.org> Thu, Sep 29, 2022 at 7:05 PM
To: John King <johncjking86@gmail.com>, Farrah Eckard <feckard@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>

Hello Mr. King,

Unfortunately I am away from work until Tuesday. I am forwarding this email to the principals and assistance principal who can assist you in this matter.

Sent from my iPhone

> On Sep 29, 2022, at 6:31 PM, John King <johncjking86@gmail.com> wrote:
>
> **Security WARNING**
> This is an external email. Do not click links or open attachments unless you recognize the sender and know that the content is safe.
>
> aredmon@14jdcfjc.org_20220913… [drive.google.com]
>
> [Quoted text hidden]

--
J.C.J. King

---

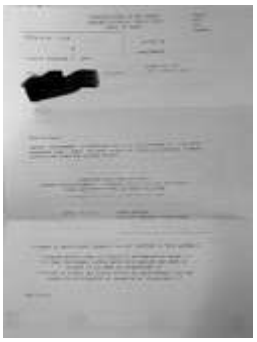
11 attachments



IMG_2083.jpeg
61K



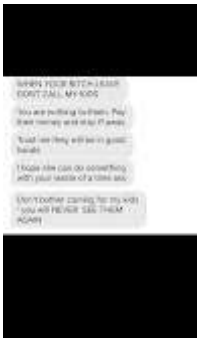
IMG_2084.jpeg
225K



IMG_2086.jpeg
15K



IMG_2082.jpeg
17K



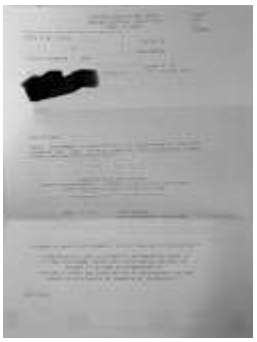
IMG_2085.jpeg
147K



IMG_2087.jpeg
240K



IMG_2083.jpeg
61K



IMG_2086.jpeg
529K



IMG_2082.jpeg
405K



IMG_2084.jpeg
225K

06.08.2022 Amended TRO 817-22.pdf
214K

John King <johncjking86@gmail.com> Thu, Sep 29, 2022 at 8:24 PM
To: Tammey Cook <tcook1@lakecharlescharter.org>
Cc: Farrah Eckard <feckard@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>

The court order is attached at top of the email .

Please see attached.

aredmon@14jdcfjc.org_20220913…

[Quoted text hidden]
--
J.C.J. King

Tammey Cook <tcook1@lakecharlescharter.org> Thu, Sep 29, 2022 at 8:56 PM
To: John King <johncjking86@gmail.com>, Farrah Eckard <feckard@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>

We've reviewed all documents. Monica can pick up the kids but it is recommended that she is accompanied by someone from the sheriff's department to avoid any unwarranted protest from Charmaine.

Sent from my iPhone

> On Sep 30, 2022, at 1:25 AM, John King <johncjking86@gmail.com> wrote:
>
> **Security WARNING**
> This is an external email. Do not click links or open attachments unless you recognize the sender and know that the content is safe.
>
> The court order is attached at top of the email .
>
> Please see attached.
>
> aredmon@14jdcfjc.org_20220913… [drive.google.com]
>
> [Quoted text hidden]

John King <johncjking86@gmail.com> Fri, Sep 30, 2022 at 12:21 PM
To: Tammey Cook <tcook1@lakecharlescharter.org>
Cc: Farrah Eckard <feckard@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>

Thank you for responding. We're trying to get this done with least amount of conflict but that seems to be impossible as Charmaine is aware she is once again blocking access to my children intentionally against the court order.

She is not allowed to check them out on my pick up days or be on the campus. She has been constantly contacting their schools last couple weeks to block the court order.

The sheriff needs a civil warrant or has to wait until the crime or violence occurs before they can do anything. Unless you have the email to send to the hearing officer that says she's telling you guys not to allow me to see my children .

Please let me know next steps.
John King Sr.
[Quoted text hidden]
--
J.C.J. King

John King <johncjking86@gmail.com> Mon, Oct 3, 2022 at 4:01 PM
To: Tammey Cook <tcook1@lakecharlescharter.org>
Cc: Farrah Eckard <feckard@lakecharlescharter.org>, Kathryn Istre <kistre@lakecharlescharter.org>, Marcus Simon <msimon@lakecharlescharter.org>

Good afternoon,

Thank you for reviewing the emails. I will be coming more often to see my children and Friday Charmaine put up alot of challenges that the courts have told her to stop doing. Because of the dangerous nature and her recent erratic behavior claiming my children are threatening suicide and murder in order to try to get me to answer the phone for her I want to attend safely and support their activities until the custody trial is completed.

Could someone please alert John Jr football coach and campus security to make sure they have the court orders and restraining orders and the threats so that they are aware that conflict is likely to occur at his games/ practice etc. I do not want this for my children I only want to exercise joint custody as I always have been. Also please note that Charmaine is not my wife and never has been married to me. I am Married to a good woman and that is the reason for Charmaine behavior and why she is hurting my children. I hope and pray this is resolved safely very soon and I will try to minimize the Chance for conflict until we go to court on Nov 15, 2022

Thank you all I'm trying my best.
Tell John Jr I love him and will see him soon
Thank You
JK
[Quoted text hidden]
--
J.C.J. King

John King <johncjking86@gmail.com> Thu, Feb 22, 2024 at 4:10 PM
To: baleigh@abshirelawfirm.com, dustan@abshirelawfirm.com

Dustin for your records. Even the school counselor said charmaine was protesting me picking my son up from school. Additional evidence of her lies attached. This is bold parental alienation

J.C.J. King
[Quoted text hidden]

Letter

From: Kay Bang <kay.bang@lccitycourt.org>

To: "truekingfile@gmail.com" <truekingfile@gmail.com>

Cc: Monica Abshire <mabshire@lccitycourt.org>

Date: Mon, 17 Nov 2025 21:25:23 +0000

Attachments:
MX-M264N_20251117_155017.pdf

Mr. King,

Please see the attached letter from Judge Jamie Bice regarding your most recent filings, along with an updated Cost Bill.

The original letter with attachments will be sent to you today via Certified Mail, Return Receipt Requested.

Best regards,

Kay Bang

Kay Bang
Court Administrator and Judicial Paralegal
Lake Charles City Court
118 W. Mill Street
Lake Charles, LA 70601
337-491-8699 office
337-491-8676 fax
kay.bang@lccitycourt.org<mailto:kay.bang@lccitycourt.org>

JAMIE B. BICE, JUDGE
RONALD C. RICHARD, JUDGE

OFFICE: 337-491-1305
FAX: 337-491-8676

CIVIL SECTION: 337-491-1564
CIVIL FAX: 337-491-1303

VIOLATION BUREAU: 337-491-1565
VIOLATION FAX: 337-491-8745

LAKE CHARLES CITY COURT
WARD 3 CALCASIEU PARISH

P.O. Box 1664/118 West Mill Street
Lake Charles, LA 70602-1664/70601-4217
www.lccitycourt.org

November 14, 2025

Mr. John Clifford King, Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601
Via CMRRR and email truekingfile@gmail.com

Re: Civil Action No. 23-2124; John Clifford King v Renee Amos

Dear Mr. King:

Our Clerk of Court has notified me of two fax filings you recently submitted in the above-referenced matter. Please be advised that those filings have been time-stamped but not filed into the record because once an appellate decision becomes final under La. C.C.P. art. 2166 and 2167 (as is the case in the above-referenced matter), the judgment acquires *res judicata* effect which bars further litigation of issues that have already been adjudicated. Simply stated, *res judicata* means that an issue that has been definitively settled by judicial decision. The essential elements of *res judicata* are (1) an earlier decision on the issue, (2) a final judgment on the merits, and (3) the involvement of the same parties, or parties in privity with the original parties. *Black's Law Dictionary,* 12th edition.

La. C.C.P. art. 2166 provides that "the judgment of a court of appeal becomes final and definitive if neither an application to the court of appeal for rehearing nor an application to the supreme court for a writ of certiorari is timely filed." La. C.C.P. art. 2166. Our records do not reflect that you filed an application for rehearing with the Third Circuit Court of Appeal following its judgment entered on May 21, 2025. Likewise, La. C.C.P. art. 2167 states that "a judgment of the supreme court becomes final and definitive when the delay for application for rehearing has expired and no timely application therefor has been made."

Additionally, La. R.S. Section 13:4231 codifies the *res judicata* doctrine, providing that "a valid and final judgment is conclusive between the same parties, except on appeal or other direct review." This means that once an appellate judgment becomes final and definitive, any subsequent proceedings in the trial court must be authorized by the remand instructions or must fall outside the scope of the issues already decided. As no such authorization exists here, and this matter has been closed at Lake Charles City Court, the two faxed documents you submitted are being **returned** to you. Finally, any future filings in a matter that has been fully adjudicated and after

all appeals have been exhausted may subject the filer to sanctions, including contempt of court. La. C.C.P. art. 224.

With regard to the cost bill sent to you on May 28, 2025 and again on July 10, 2025, please be aware that La. C.C.P. art. 5186 and 5188 establish that indigent parties (pauper status) who do not prevail on the merits of a case are still responsible to pay costs as cast. More specifically, La. C.C.P. art. 5186(c) states that when an indigent party loses, costs become due. Enclosed is an updated Cost Bill for your review. This updated Cost Bill reflects the Third Circuit ruling of May 21, 2025 and has been adjusted as a result. If you have any questions about the cost bill, please call Monica Abshire at 337-491-1564.

Sincerely,

Jamie B. Bice
Chief Judge, Lake Charles City Court

JBB/kb

CITY COURT

Ward 3 Calcasieu Parish

P.O. Box 1664
Lake Charles, LA 70602

Jamie B. Bice, Judge
Ronald C. Richard, Judge

Cost Bill

November 17, 2025
UPDATED

TO: John Clifford J. King
123 N. Louisiana Ave
Lake Charles, LA 70601
Email: truekingfile@gmail.com

John Clifford J King

Suit No. 23-2124

Renee Amos Notary Public Notary ID# 29374

Our records indicate that you have an **outstanding** balance owed to Lake Charles City Court in the amount of. **$5397.36 minus Credit $105.00 = New Balance of $5292.36**

Listed below is a record of the deposits and total court cost.

Total of Deposits	$2,362.50
Total of Court Cost	($7,223.61)
Refund	($ 536.25)
Balance:	($5,397.36)
Subject to Credit:	$105.00

Please remit payment to Lake Charles City Court for the amount listed above.
Credit cards are assessed an online transaction fee

If you have any questions about the named suit above, please call the Civil office at (337)491-1564.

Monica Abshire
Clerk of Court

FAX COVER SHEET

TO	Lake Charles City Fax
COMPANY	lake charles city court
FAX NUMBER	13374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 18:52:44
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is SUPPLEMENTAL FAX attached to earlier fax dated for today 11/13/2025

Notice of Lack of Jurisdiction and Divestiture Confirmation

Plaintiff submits this Notice to confirm that the Court was divested of jurisdiction on December 3 2024 upon the granting of a devolutive appeal pursuant to Louisiana Code of Civil Procedure article 2088. From that date forward the Court lacked authority to issue orders conduct hearings impose costs generate service attempts rescind pauper status or issue contempt citations. All actions taken after divestiture are void ab initio.

The Court nevertheless conducted hearings on December 18 and December 30 2024 generating additional costs service returns and contempt related entries. These actions were taken without authority and are null. Plaintiff submits this Notice to ensure that no post divestiture fees orders or actions are enforced now or in the future.

ELECTRONIC

FILE DATE: 11-13-2025

Emergency Notice of Prohibited Fee Enforcement

Plaintiff submits this Emergency Notice to preserve all rights before expiration of the statutory period and to document ongoing prohibited enforcement attempts. Plaintiff contacted the Clerk of Lake Charles City Court on this date to request removal of fees and costs that were entered after the Court was divested of jurisdiction on December 3 2024. The Clerk refused and stated that Judge Ronald C Richard is demanding that Plaintiff pay these fees.

All fees assessed after December 3 2024 are void under Louisiana Code of Civil Procedure article 2088. The Court lacked authority to issue orders hold hearings generate service returns or impose costs. Plaintiff has never provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and any fees based on those returns are fraudulent and unenforceable.

The Clerk refusal to remove void fees and the judge ongoing demand for payment constitute retaliation intimidation and abuse of authority. Plaintiff submits this Notice to ensure the record reflects that Plaintiff has objected to all post divestiture fees and that any attempt to enforce them now or in the future is unlawful and constitutes retaliation under state and federal law.

Plaintiff requests that this Emergency Notice be entered into the record immediately.

Respectfully submitted

John C King Sr

ELECTRONIC

FILE DATE: 11-13-2025

Notice of Correction of False Addresses and Appellate Misrepresentations

Plaintiff submits this Notice to correct multiple inaccuracies and fabricated statements that appear in the record. Plaintiff has never lived in or provided any address in Iowa Louisiana. All service returns referencing Iowa Louisiana were fabricated and all fees assessed for service at that location were created without factual basis and must be removed immediately.

Additionally statements made by attorney Mr Bauman regarding the location of a homicide are false. The incident referenced in the appellate filings occurred in Houston Texas not Iowa Louisiana. The claim that Plaintiff spouse called helicopters is also false and unsupported. These misrepresentations distorted the appellate record and contributed to inflated court costs and retaliatory actions taken by the Court.

Plaintiff respectfully requests formal correction of the record and removal of all fees linked to false information.

ELECTRONIC

FILE DATE: 11-13-2025

Monica Abshire

From: Monica Abshire
Sent: Friday, November 14, 2025 7:36 AM
To: truekingfile@gmail.com
Subject: Emailing: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax
Attachments: 23-2124 King v Amos - Affidavit of Transmission - Supp. Fax.pdf

Please see attached the Affidavit of Transmission on Supplemental Fax to 11/13/2025 filings.

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King v Amos - Affidavit of Transmission - Supp. Fax

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Affidavit of Transmission

Attention: John C King Sr Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C King Sr vs Renee Amos – 4 pages received – Notice of Lack of Jurisdiction and Divestiture Confirmation; Emergency Notice of Prohibited Fee Enforcement; Notice of Correction of False Addresses and Appellate Misrepresentations

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Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

FAX COVER SHEET

TO	Clerk Abshire
COMPANY	
FAX NUMBER	3374911303
FROM	msjonesbeaty@gmail.com
DATE	2025-11-13 12:40:05
RE	please file into case number 23-2124 thank you

COVER MESSAGE

email is truekingfile@gmail.com this is a fax

23-2124 COVER LETTER

TO CLERK OF COURT

LAKE CHARLES CITY COURT WARD THREE

Please file the enclosed Motion Proposed Order and Certificate of Service in Case Number 23 2124 King versus Amos.

Respectfully

John C King Sr

Combined Motion to Vacate Divested Orders

NO 23 2124

CITY COURT OF LAKE CHARLES

WARD THREE

CALCASIEU PARISH LOUISIANA

JOHN C KING SR

Plaintiff

versus

RENEE AMOS AND THE HARTFORD

Defendants

Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard

Plaintiff John C King Sr submits this motion to preserve all rights before the statutory deadline. Plaintiff requests that the Court vacate all actions taken after divestiture of jurisdiction remove all improper and retaliatory costs strike all contempt related actions seal identifying information and recuse Judge Ronald C Richard due to bias hostility and misconduct.

Background

Plaintiff is the sole plaintiff in this matter. His spouse S J K has never been a party to this case. Judge Richard nevertheless ordered her to appear in court without jurisdiction service or lawful authority. She is a non resident and a protected crime victim.

Summary of Misconduct

Judge Richard did the following

Accused spouse of practicing law without basis.

Forced a non resident non party to appear under threat.

Threatened to send the District Attorney across state lines.

Denied Plaintiff and spouse access to legal counsel.

ELECTRONIC

FILE DATE: 11-13-2025

Forced disabled spouse to remain without medical accommodation.

Ordered courtroom doors locked during the November 2024 hearing.

Read spouse private address into the public record.

Created circumstances leading to a December 11 2024 intruder incident in Houston Texas.

Lost jurisdiction on December 3 2024 under article 2088.

Held hearings on December 18 and December 30 after divestiture.

Rescinded pauper status without a contradictory hearing.

Created fabricated Iowa Louisiana service addresses and false fees.

Issued retaliatory contempt without cause or notice.

Allowed false appellate statements by Mr Bauman including a false claim the homicide occurred in Iowa Louisiana.

Ignored that neither of Plaintiff parents ever lived in Iowa Louisiana.

Legal Basis

Orders after December 3 2024 are null under article 2088.

Recusal required under article 151.

Constitutional violations include amendments One Four and Fourteen.

Misconduct violates Louisiana Revised Statutes 14 134 14 118 14 122.

Disability protections under ADA Title Two were violated.

Victim protections under Louisiana and federal law were violated.

Relief Requested

Recusal of Judge Ronald C Richard.

Vacatur of all orders rulings costs and contempt actions after December 3 2024.

Removal of all fabricated service fees linked to Iowa Louisiana addresses.

Sealing of any document that contains Plaintiff or spouse identifying information.

Reassignment to an impartial judge.

Any further relief necessary to protect Plaintiff from retaliation.

Respectfully submitted

John C King Sr

123 N Louisiana Avenue

Lake Charles Louisiana 70601

Certificate of Service

I certify that a copy of this motion was served on all parties by email on this date.

Signed John C King Sr

23-2124 CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I certify that the Combined Motion Proposed Order and Cover Letter were served via email on all parties on November 13 2025.

Signed

Verified by pdfFiller
11/13/2025

John C King Sr

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

23-2124 PROPOSED ORDER

ORDER

CONSIDERING the Combined Motion to Vacate Divested Orders Remove Retaliatory Fees Strike Contempt Seal Records and Recuse Judge Ronald C Richard:

IT IS ORDERED that Judge Ronald C Richard is recused.

IT IS ORDERED that all orders judgments costs and fees after December 3 2024 are vacated.

IT IS ORDERED that all identifying information of Plaintiff and spouse be sealed.

Signed this date.

ELECTRONIC

FILE DATE: 11-13-2025

ACTS FAX

ACTS FAX **ACTS FAX ACTS** FAX **ACTS** FAX

ACTS FAX

DATE:

02/06/2025

From:

Heather Goleman, Deputy Clerk

(337) 433-9403

SUBJECT: **Louisiana** 3rd **Circuit Case** No. **CW** 25 **00044**

Lower Court Case No.: 2023-2124

Calcasieu

Fourteenth Judicial **District** C

To:

JOHN CLIFFORD J. KING VERSUS

RENEE AMOS NOTARY **PUBLIC**

ID #29374 **AND HARTFORD**

FIRE **INSURANCE** COMPANY

Hon. Ronald C. Richard Attorney at Law
330 Alamo Street
Lake Charles, LA 70601 Fax No.
(337) 494-1793 Work No. (337)
494-1900

Oliver Jackson Schrumpf Schrumpf &
Schrumpf 3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

LZS-1 8000/10ood L6Z-1

0697-161-*L88*

01001 PAY MORE 90:60 92-90-20

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson
Schrumpf

Edward Kelly Bauman

Counsel for:
John Clifford J. King

Counsel for:
Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider... motions [regarding pauper status]" Mason v. *Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v.* Ferrington, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of *the* order of appeal, the trial court does not have jurisdiction to hear *the* pro se motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

LZ8-1 8000/2000d 163-1

0692-167-188

o PAY WOUD 90:60 92-90-20

SIZ SJG

JWP

Affidavit of Transmission

Attention: John C. King Sr

Fax No. 508-524-2132

Email: truekingfile@gmail.com

I hereby certify that, pursuant to RS 13:850, we have received the following documents from you via fax/email: November 13, 2025

Docket No. 23-2124 John C. King Sr vs. Renee Amos – 12 pages received – Combined Motion to Vacate Divested Orders

---

Within seven (7) days, exclusive of legal holidays, please submit the following to our Court:

1. The original signed document
2. Filing fee
3. A transmission fee of $5 dollars.

Monica Abshire, Clerk of Court

Lake Charles City Court

P. O. Box 1664/118 West Mill Street

Lake Charles, LA 70602/70601

Monica Abshire

From: Monica Abshire
Sent: Thursday, November 13, 2025 4:01 PM
To: True King
Subject: Emailing: 23-2124 King vs Amos - Affidavit of Transmission
Attachments: 23-2124 King vs Amos - Affidavit of Transmission.pdf

Please see attached the Affidavit of Transmission.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

Your message is ready to be sent with the following file or link attachments:

23-2124 King vs Amos - Affidavit of Transmission

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Letter and Plea to Civil Court Judge Small Claims

John CJ King Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601
johncjking86@gmail.com **July 02, 2023**

VS Case # 23-1206

Charmaine Y. Colston
(through her attorney)

Dear Honorable Judge Lake Charles City Court, Civil Divison Lake Charles Louisiana. A terrible injustice has occurred wherein my property was taken via title fraud and forgery by force from my ex girlfriend while under two restraining orders. One of which was for stalking. Additionally I had no access to an open investigation for case number 2021-00123665 until the detective released it November 2023 confirming without a doubt that the suspect Charmaine Y Colston had committed title fraud by

1. **Fraudulantly appearing in front of a notary whom was a friend while I was not in the state on 09/07/2021 and intentionally and knowingly while under a restraining order forged my signature onto a notarized document of notary Renee Amos. I was 2000 miles away on this day and there is no way I could have been in the state of Louisiana and this is confirmed by Charmaine Colston herself and a thorough investigation by the Calcasieu Parish Sheriff Department and Lake Charles Police Department. Evidence attached shows Charmaine Colston fraudulently and intentionally stealing my car title even though she was under a restraining order. These exceptions for stalking, restraining order and period of discovery as shown within the investigation shows I am well within the statute of limitations. As the defendants attorney herself made a motion saying I must "prove" through evidence that she stole the car. This evidence was released to me November 2022 and I proceeded to seek the proper remedy.**
2. **Charmaine Colston abused her position as a former employee with the city of Sulphur LA where her previous role was the transfer of auto titles for the city. Witness testimony will confirm that Charmaine Colston maliciously and intentionally engaged in scams to obtain my assets illegally. She was trained in how to do so and if you refer to the investigation conducted by Detective Castille You will see without a donut on camera that I was not there when she stole the title to my car and transferred the joint assets of myself and my spouse. The Chevrolet Traverse was obtained by title fraud the results of the investigation confirm this and she not only has scammed me but also did a fake racial discrimination lawsuit against the City of Sulphur when she was fired for disorderly conduct. She used the race card to file suit and obtain a $55k settlement from the City of Sulphur Louisiana, Colston has aslo engaged in FEMA fraud, forged life insurance and securities fraud of which the stolen policies had to be reissued back to me with a formal apology. Colston forges multiple documents pretending to be my spouse and although my ex girlfriend we have never been**

married or represented ourselves as married. I have over 35 pages of evidence from independent investigations that prove that Charmaine intentionally got the title notarized when I was not present by fraud. She also claims to have paid me "$100" for the car of which I have never received payment and it would have been impossible as Colston was under a restraining order in two different states at the time.

3. **I am asking that the dates be rescheduled to allow me the opportunity to be able to walk and my broken bones heal from my many surgeries. I humbly ask if it can be accommodate that the court notice from the Doctors note that I cannot add pressure unto my bones until after August 31, 2023 I ask the court if possible to have the hearing on a non physical therapy date the available dates are**
    a) **9/14/2023- 09/15/2023**
    b) **09/21/2023 - 09/22/2023**
    c) **10/4/2023- 10/6/2023**
    d) **10/19/2023 - 10/20/2023**

Monday - Wednesday are difficult as I have physical therapy so I humble ask that if this can be accommodated please do so.

Enclosed. You will find evidence that without a doubt shows Charmaine Colston stole my car with Maliceand as a result it has affected my ability to have transportation and employment. There are also several liens and bills against the vehicles such as tolls, lack of insurance etc that are my liability and I do not possess the financial means to recover from a robbery of this scale. Please allow me the opportunity to subpoena my witnesses from the local and state governments who conducted the investigations.

Thank You for your courtesy with this delicate matter.

John CJ King

AFFIDAVIT OF MONICA GUILLORY

I, **Monica Guillory**, fear for the life and safety of my son **John King Sr.**, my grandchildren, my son's spouse **Mrs. John King Sr.**, our family, and our extended family due to the ongoing harassment, coercive control, and civil rights violations perpetrated by **Charmaine Y. Colston** over the past **17+ years**.

Statement of Facts

1. **Pattern of Stalking, Harassment, and Coercive Control**
    - Charmaine Colston has engaged in **continuous harassment and coercive control**, which includes **electronic surveillance, hacking, social media harassment, false legal claims, excessive litigation, fraudulent court filings, and threats** against my family.
    - Under **Louisiana Revised Statutes § 14:40.2**, **stalking** is defined as **intentional and repeated harassment that causes a person to feel alarmed or distressed**, including threats of harm to the victim's safety. Ms. Colston has exhibited such behavior continuously.
2. **Mail Fraud and False Representation as a Government Agency**
    - Over the past **two years**, Ms. Colston has sent fraudulent mail to my home **misrepresenting herself as a government agency**, violating **18 U.S. Code § 1341 (Mail Fraud)** and **18 U.S. Code § 912 (False Impersonation of a Government Official)**, both federal offenses.
    - She has **illegally enrolled my address in USPS Informed Delivery, intercepted and removed mail from my mailbox**, violating **U.S. Postal Regulations (18 U.S. Code § 1708 - Theft of Mail Matter)**.
3. **Illegal Stipulated Judgment & Judicial Misconduct**
    - On **May 31, 2022**, I personally witnessed an **illegal stipulated judgment** in which Attorney **Scott Hawkins** and **Orelia Lawdins-Trent** falsely claimed my son **agreed to a judgment**, violating his **due process rights** under the **Fifth and Fourteenth Amendments of the U.S. Constitution**.
    - **Judicial Canon 2, Louisiana Code of Judicial Conduct**, prohibits judges from engaging in conduct that undermines the **integrity and impartiality** of the judiciary. The judicial actions taken in **Case #2021-2773 before Judge Mitchell Redd** directly violate these ethical guidelines.
4. **Hacking, Electronic Surveillance, and Privacy Violations**
    - Ms. Colston has **illegally accessed emails, texts, and GPS tracking** of multiple family members, including myself, **John King Sr.**, and **John T. King**, violating:
        - **18 U.S. Code § 1030 - Computer Fraud and Abuse Act (CFAA)**

        - **Louisiana R.S. 14:73.5 - Unlawful Access to Stored Communications**
5. **Child Endangerment & Psychological Abuse of Grandchildren**

    - Ms. Colston has placed my **grandchildren in danger** for over a decade, including a **documented incident where she attempted to drive into an oncoming train**, threatening to **kill everyone in the car** unless my son unlocked his phone.
    - Under **Louisiana R.S. 14:93 - Cruelty to Juveniles**, her actions constitute **child endangerment** and **psychological abuse**, punishable under Louisiana law.
6. **Excessive Litigation as Coercive Control**

    - Ms. Colston has engaged in **malicious prosecution** and **excessive litigation** as a form of **harassment and coercive control**, violating:
        - **Louisiana Code of Civil Procedure Art. 863 - Frivolous Pleadings & Abuse of Process**
        - **42 U.S. Code § 1983 - Civil Action for Deprivation of Rights**
7. **Federal Restraining Order and Property Exclusion**

    - **Effective immediately**, I, **Monica Guillory**, along with **John King Sr. and our entire immediate family**, will be filing a **federal restraining order** against **Charmaine Y. Colston**.
    - As a **homeowner**, I have the legal right under **Louisiana Civil Code Art. 3421** and **Fourth Amendment property rights** to **exclude any individual from my property whom I deem a threat to safety**. Ms. Colston is:
        - **Prohibited from visiting any immediate family residences or businesses**
        - **Banned from hacking, social media harassment, GPS tracking, and stalking through third-party representatives**
        - **Forbidden from using stolen text messages, recordings, or documents** against our family
8. **Recent Escalation of Threats & Public Acts of Instability**

    - In **September 2024**, Ms. Colston **auctioned off birthday presents** purchased by our family for **Jayla and John King Jr.**, an act of **emotional instability and psychological manipulation**.
    - In **December 2024**, **death threats were sent from anonymous Google numbers**, increasing the need for **immediate legal intervention**.
9. **Contradictory Statements in Court & Continued Harassment**

    - Ms. Colston **claimed in court that my grandchildren did not want to see their father**, yet she **privately begs to be in his presence** and has **attempted to interfere in his marriage**.
    - She has **falsely signed legal documents in my son's name through third parties**, a criminal offense under **Louisiana R.S. 14:72 - Forgery**.

Legal Notice to Charmaine Colston & Her Counsel

This affidavit serves as **official notice** that Ms. **Charmaine Y. Colston** is **prohibited** from:

1. **Entering any property owned or occupied by the Guillory or King families**
2. **Contacting, harassing, or interfering with our family in any manner**
3. **Accessing emails, social media, or electronic communications**
4. **Engaging in litigation as a form of harassment**
5. **Using third parties to stalk, harass, or collect information on our family**

Conclusion

Ms. **Charmaine Y. Colston** has repeatedly violated **state and federal laws** related to **harassment, stalking, mail fraud, forgery, hacking, child endangerment, and coercive control**. The ongoing misconduct, threats, and legal manipulation **will no longer be tolerated**.

We, **Monica Guillory and the immediate family of John King Sr.**, are **pursuing all available legal remedies**, including:

- **Federal Restraining Order**
- **Legal Action under Louisiana and Federal Law**
- **Affidavits prohibiting access to all family homes & businesses**

This affidavit is **sworn under penalty of perjury** and will be **submitted with exhibits** documenting:

- **Mail fraud committed by Ms. Colston**
- **Threats and harassment directed at our family**
- **Slanderous statements made online**

Executed this ____ day of _____, 2025
Monica Guillory
123 North Louisiana Avenue
Lake Charles, Louisiana 70601
kmonica610@gmail.com

Sworn before me this ____ day of _____, 2025
Notary Public Signature & Seal

IN RE: JOHN CLIFFORD J. KING

Lake Charles City Court

Calcasieu Parish, Louisiana

Filed _____

_____
Deputy Clerk of Court

MOTION TO BE EXCUSED FROM HEARING

Now comes Oliver "Jackson" Schrumpf, attorney, individually, who respectfully shows:

1. On November 7, 2024, Movant enrolled as attorney for John King in the matter entitled John King vs. Rene Amos, No. 2023-2124, Lake Charles City Court.
2. The King vs Amos matter was tried on November 14, 2024.
3. Judgment was signed in that matter on November 21, 2024 and Notice of Judgment was mailed by the Clerk on the same day.
4. An order granting a devolutive appeal of that judgment was granted on December 5, 2024.
5. In accordance with La. C.C.P. Art. 2088. Divesting of jurisdiction of trial court:

   A. **The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, ... on the granting of the order of appeal, in the case of a devolutive appeal.** Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following: (none applicable in this case).
6. John King has subsequently filed other pleadings in Lake Charles City Court and John King, and his wife, have been cited to appear in other matters not involving the Judgment subject to appeal. (Even if the wording of the pleadings filed by King was vague or ambiguous, or even if it intended to refer to the judgment in 2023-2124, regardless, the Court would not have jurisdiction to take any action on that particular matter because the jurisdiction of the Court is "divested").
7. Oliver "Jackson Schrumpf does not represent the John King or Shunte King in the contempt matters or any other matters other than the devolutive appeal in King vs. Rene Amos, No. 2023-2124.

8. On December 18, 2024, after e-mail exchanges by the Judge's paralegal and Oliver Schrumpf, the Court, Judge Ron Richard, called Oliver Schrumpf and, by telephone, ordered Schrumpf to appear at a hearing on December 30, 2024 at 9:00 AM. Schrumpf protested that he does not represent the Kings on the newly filed pleadings or on the contempt matters. Judge Richard, nevertheless said that the King pleadings sought recusal of the judge as to all judgments, which Judge Richard believes means even the judgment described in paragraph 3 above.

9. As attorney for John King in the King vs. Rene Amos, No. 2023-2124, Oliver Schrumpf here shows that the trial court's jurisdiction over that judgment has been divested and no action can be taken as to that judgment by the trial court.

Accordingly, Oliver Schrumpf requests the Court rescind its order for Oliver Schrumpf to appear on December 30, 2024 and excuse Oliver Schrumpf from appearing, reserving to John King the right to retain other counsel to represent him in that matter.

Respectfully Submitted By

SCHRUMPF LAW OFFICE,
A PROFESSIONAL LAW CORPORATION

BY: Oliver Schrumpf
OLIVER "JACKSON" SCHRUMPF
LA Bar Roll No. 11832
3801 Maplewood Drive
Sulphur, LA 70663
Tel - 337/625-9077
Fax-337-625-8231
oschrumpf@schrumpf-law.com

O R D E R

Considering the foregoing Motion, let OLIVER "JACKSON" SCHRUMPF be excused from appearing at the hearing currently fixed for December 30, 2024 at 9:00 AM.

SIGNED in Chambers in Lake Charles, Louisiana, on this _____ day of _____, 2024.

_____
RON RICHARD, CITY JUDGE

CERTIFICATE OF SERVICE

I CERTIFY THAT A COPY OF THE FOREGOING pleading has been mailed to counsel for all parties, by depositing a copy of same in the U.S. Mail, properly addressed and postage prepaid.

Kamie T. Dominic
Law Offices of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles LA 70601

also VIA EMAIL: kamiedominiclaw@gmail.com

And

Ed K. Bauman
1801 Ryan St,
Lake Charles, LA 70601

also VIA EMAIL: ed@lakecharlesattorney.com

JOHN CLIFFORD J. KING via e-mail: truekingfile@gmail.com

Sulphur, Louisiana , this 19th day of December, 2024.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

STATE OF LOUISIANA
SECRETARY OF STATE

R. Kyle Ardoin
Secretary of State

Notary Division
(225) 925-4704

Fax Numbers
(225) 932-5359 Notary

TRANSMITTAL INFORMATION
For All Notary Filings

JCK

~~John C. King Sr.~~ John Clifford King
Name of person filing document

123 N. Louisiana Ave.
Address

Lake Charles	Louisiana	70615
City	State	Zip Code

318-995-1705		johncjking86@gmail.com
Daytime phone number	Fax number	Email address

R. Kyle Ardoin
Secretary of State

COMPLAINT ALLEGING UNAUTHORIZED EXERCISE OF NOTARIAL POWERS

La. R.S. 35:601 *et seq*.

RETURN COMPLETED FORM TO:
Secretary of State Notary Division,
P.O. Box 94125
Baton Rouge, LA 70804

Parish of Calcasieu

Before me, the undersigned authority came and appeared the undersigned complainant, who in accordance with the provisions of La. R.S. 35:603, and being duly sworn, did depose and say that

Renee Amos — **Printed name of subject of complaint**

29374 — **Notary ID# if known**

is in violation of the following provision(s) of La. R.S. 601 *et seq*. (UNAUTHORIZED EXERCISE OF NOTARIAL POWERS)

Violation(s): check all that apply

_____ Commission or authority to exercise notary function is statutorily or judicially suspended.
_____ Commission or authority to exercise notary function is statutorily or administratively revoked.
_____ No longer validly commissioned**.**
_____ Commission in retirement status under provisions of R.S.35:202(G)
_____ No longer validly possessed of the office or position from which authority to exercise notarial functions were derived**.**
_____ Convicted of a felony and has not been pardoned.
__✓__ Not authorized by law to exercise that particular notarial function**.**
__✓__ Violated any provision of any law governing the office of notary or the exercise of notary authority**.**
_____ Abandoned his commission.
_____ Failed to pay over money entrusted to him in his official capacity as a notary public.
_____ Failed to satisfy any final judgment rendered against him in his official capacity as a notary public.
__✓__ Not authorized to exercise notarial powers**.**

Complainant's statement to include details of violation(s), its nature, the dates, time(s), address(es) where violation(s) occurred and address of subject of the complaint. (attach additional page(s) if necessary):

On September 7, 2021 Amos notarized a document, stating that I sold my car to Charmaine Colston. I did not sell my car to Colston and I was not in louisiana or present in the action of said notary. I was not in louisiana when Colston walked in the office of Amos to get my title notarized and transfered to her which resulted in the transfer of my title to colston, which was entirely unknown to me at the time of the transaction. I became aware of the situation months after.

Complainant name: ~~John C King Sr.~~ John Clifford King JCK **Phone:** 318-995-1705

Complainant address: 123 N. Louisiana Ave. **City, State, Zip:** Lake Charles, LA 70601

State of Florida, County of Palm Beach

Signature of Complainant

Sworn to and subscribed before me this ~~28th~~ 26 day of ~~April~~ March, 20 23

He/she is personally known __ or has produced ✓ driver's license, as identification.

Signature of notary

EGLARINE HARRISON
Notary Public - State of Florida
Commission # HH146993
Expires on October 11, 2025

Eglarine Harrison — Printed name of notary

HH146993 — FL ~~La.~~ Notary ID#

Notarized online using audio-video communication

STATE OF LOUISIANA
SECRETARY OF STATE

R. Kyle Ardoin
Secretary of State

Notary Division
(225) 925-4704

Fax Numbers
(225) 932-5359 Notary

TRANSMITTAL INFORMATION
For All Notary Filings

JCK

~~John C. King Sr.~~ John Clifford King
Name of person filing document

123 N. Louisiana Ave.
Address

Lake Charles	Louisiana	70615
City	State	Zip Code

318-995-1705		johncjking86@gmail.com
Daytime phone number	Fax number	Email address

R. Kyle Ardoin
Secretary of State

COMPLAINT ALLEGING UNAUTHORIZED EXERCISE OF NOTARIAL POWERS

La. R.S. 35:601 *et seq*.

RETURN COMPLETED FORM TO:
Secretary of State Notary Division,
P.O. Box 94125
Baton Rouge, LA 70804

Parish of Calcasieu

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Renee Amos — **Printed name of subject of complaint**

29374 — **Notary ID# if known**

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Violation(s): check all that apply

_____ Commission or authority to exercise notary function is statutorily or judicially suspended.
_____ Commission or authority to exercise notary function is statutorily or administratively revoked.
_____ No longer validly commissioned**.**
_____ Commission in retirement status under provisions of R.S.35:202(G)
_____ No longer validly possessed of the office or position from which authority to exercise notarial functions were derived**.**
_____ Convicted of a felony and has not been pardoned.
__✓__ Not authorized by law to exercise that particular notarial function**.**
__✓__ Violated any provision of any law governing the office of notary or the exercise of notary authority**.**
_____ Abandoned his commission.
_____ Failed to pay over money entrusted to him in his official capacity as a notary public.
_____ Failed to satisfy any final judgment rendered against him in his official capacity as a notary public.
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Complainant name: ~~John C King Sr.~~ John Clifford King JCK **Phone:** 318-995-1705

Complainant address: 123 N. Louisiana Ave. **City, State, Zip:** Lake Charles, LA 70601

State of Florida, County of Palm Beach

Signature of Complainant

Sworn to and subscribed before me this ~~28th~~ 26 day of ~~April~~ March, 20 23

He/she is personally known __ or has produced ✓ driver's license, as identification.

Signature of notary

EGLARINE HARRISON
Notary Public - State of Florida
Commission # HH146993
Expires on October 11, 2025

Eglarine Harrison — Printed name of notary

HH146993 — FL ~~La.~~ Notary ID#

Notarized online using audio-video communication

Notice of Lack of Jurisdiction and Divestiture Confirmation

Plaintiff submits this Notice to confirm that the Court was divested of jurisdiction on December 3 2024 upon the granting of a devolutive appeal pursuant to Louisiana Code of Civil Procedure article 2088. From that date forward the Court lacked authority to issue orders conduct hearings impose costs generate service attempts rescind pauper status or issue contempt citations. All actions taken after divestiture are void ab initio.

The Court nevertheless conducted hearings on December 18 and December 30 2024 generating additional costs service returns and contempt related entries. These actions were taken without authority and are null. Plaintiff submits this Notice to ensure that no post divestiture fees orders or actions are enforced now or in the future.

Notice of Lack of Jurisdiction and Divestiture Confirmation

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NOTICE OF APPEAL
CIVIL CASE

JOHN CLIFFORD J KING

VS.

RENEE AMOS NOTARY PUBLIC
NOTARY ID# 29374

JAMIS Control No. _____

Case No. 23-2124

Parish of CALCASIEU

State of LOUISIANA

TO: OLIVER SCHRUMPF
SCHRUMPF LAW OFFICE, APLC
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

Division CIVIL

RONALD C. RICHARD
Presiding Judge

REBECCA BERKEN/KAREY BANG
Court Reporter

TWO HOURS (2)
Estimated Hours of Testimony Taken

NOTICE is hereby given that on DECEMBER 2, 2024 upon motion of JOHN CLIFFORD J KING, PLAINTIFF (Give appellant's proper name and designate whether he or she is plaintiff, defendant, or intervenor, etc.), an order of appeal was entered on DECEMBER 3, 2024, granting an appeal from judgment of NOVEMBER 14, 2024, returnable to the COURT OF APPEAL, 3rd Circuit, 45 days from when costs are paid.

The appeal taken was:

[ ] Suspensive Bond $_____ [ ] In Forma Pauperis

According to Law_____

[X] Devolutive Bond set at $_____ [ ] Act La. R.S. 13:4521 & 13:4581

I certify that the foregoing notice was this day mailed by me in accordance with Article 2121, La. C.C.P.

LAKE CHARLES, Louisiana, this the 20TH day of DECEMBER, 2024.

Karey Bang
DEPUTY CLERK OF COURT

ATTENTION: Under Article 2126, La. C.C.P., all estimated costs of the appeal must be paid to the Clerk within 20 days.

EXTENSION OF RETURN DAY GRANTED BY THE TRIAL COURT

The return day was extended from _____, _____, to _____, _____

Order Signed by _____ Date Signed: _____

Reason for Extension:_____

I certify that the foregoing extension notice was this day mailed by me in accordance with Article 2125, La. C.C.P., _____, Louisiana, this the _____ day of _____, _____

_____
DEPUTY CLERK OF COURT

October 19
12:39 PM
All Photos



JOHN CLIFFORD JOSEPH KING, SR.	:	14TH JUDICIAL DISTRICT COURT
VS. NO. 2021-002773, DIV. A	:	PARISH OF CALCASIEU
CHARMAINE COLSTON	:	STATE OF LOUISIANA
FILED: AUG 13 2021	:	DEPUTY CLERK

ORDER

The foregoing petition, prayer, affidavit, and premises considered:

IT IS ORDERED that the Defendant, CHARMAINE COLSTON, be served with a certified copy of this Petition with notice and citation.

IT IS FURTHER ORDERED that a Temporary Restraining Order is issued herein, without notice and without bond, restraining and enjoining CHARMAINE COLSTON from unnecessarily disturbing, harassing, stalking, or threatening JOHN CLIFFORD JOSEPH KING, SR. in any manner whatsoever, including, but not limited to, telephonic and electronic communications- such as text, email, and social media messaging.

IT IS FURTHER ORDERED that the Defendant, CHARMAINE COLSTON, appear before the Hearing Officer of this Honorable Court on the 4th day of October, 2021, at 9 o'clock A.M and show cause why: Via Zoom with Tom Shea.

A. The parties should not be awarded joint custody of the minor children, with Defendant being designated as the domiciliary parent and Petitioner having reasonable visitation, including the option to exercise additional visitation in Lake Charles during extended school holiday weekends pursuant to the Calcasieu Parish School Calendar and one week for vacation during the summer, all in accordance with the attached suggested Joint Custody Plan;

B. Petitioner should not be ordered to pay child support in an amount consistent with the Louisiana Child Support Guidelines, pursuant to Revised Statute 9:315 et seq.;

C. Petitioner should not be granted permission to claim the children as dependents for State and Federal income tax purposes every year; and

D. A preliminary injunction and, in due course, a permanent injunction, should not be issued enjoining and restraining CHARMAINE COLSTON, and her agents, from unnecessarily disturbing, harassing, stalking, or threatening JOHN CLIFFORD JOSEPH KING, SR. in any manner whatsoever, including, but not limited to, telephonic and electronic communications- such as text, email, and social media messaging.

THUS DONE AND SIGNED this 19th day of August, 2021 at Lake Charles, Louisiana.

JUDGE, 14TH JUDICIAL DISTRICT COURT

W. Mitchell Redd

CAL CLERK-FAMILY COUR
AUG 13 2021 PM3:00:55

CMS7820303
Filing Date: 08/13/2021 02:59 PM
Case Number: 2021-002773
Document Name: ORDER
Page Count: 1

Physical Medicine and Rehabilitation
Occupational/Musculoskeletal Medicine
EMG and Nerve Conduction Studies
Fluoroscopic-Guided Injection Procedures
Independent Medical Exams (IMEs)
Musculoskeletal Ultrasound
Pain Management
Sports Medicine

NEW JERSEY MEDICAL SCHOOL
DOCTORS OFFICE CENTER

New Jersey Medical School
University Rehabilitation Associates
90 Bergen Street, D.O.C. Suite 3100
Newark, N.J. 07103-2499
Tel: 973-972-2802
Fax: 973-972-2825

Consultation Request

Patient: King, John
Date: 4-3-24
To: Susan Szapiel MD (973-877-5080), (973-877-5158)

Reason for consultation:

36-year-old male with recurrent falls of unclear origin along with possible cognitive dysfunction (neurology evaluation for this is pending in 7/24). Please assess for possible balance dysfunction.

electronically signed after review

Todd P. Stitik MD
Professor of PM&R, Rutgers-New Jersey Medical School

Phone: 973-972-2802 stitikto@njms.rutgers.edu

Response: (Please either write response/results here or send a separate report to my office.)

RUTGERS
New Jersey Medical School

Physical Medicine and Rehabilitation
University Rehabilitation Associates
New Jersey Medical School
Doctors Office Center, Suite 3100
Rutgers, The State University of New Jersey
90 Bergen Street Newark, NJ 07103

Musculoskeletal Medicine
Pain Management
Work Injuries
Musculoskeletal Ultrasound
Coccyx Pain Center
Phone: 973-972-2802
Fax: 973-972-2825

WORK RETURN STATEMENT

Today's Date: 4 -- 3 - 2024

To:

Date of Injury: 4 -- _____ - 2021

☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313

☐ The patient's **Supervisor**.

☐ Other (specify):

Patient Name: John King was seen (_____ AM/ PM until ____ AM/ PM) today in the Physical Medicine and Rehabilitation department (DOC-3100).
Or: ☐ The patient was seen in the office on the following date: _____ -- _____ - 201___

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ **Return to *FULL* duty on** _____--_____-- 201____.

☒ **MODIFIED duty** starting on 4 -- 3 -- 2024. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:
- ☐ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
- ☐ No overhead activities.
- ☒ Other: No crawling, climbing. only stand for limited lengths of time. Cannot fly

☒ ***Kept Out-of-Work*** from 4 -- 3 -- 2024 until & including 7 -- 15 -- 2024
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ ***After*** this date: the patient is then medically **cleared** (as of the following day) to return to:
- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☐ **FOLLOW-UP HERE** is scheduled _____--_____--201___, or in ____ week(s).

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.
If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD
Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

Todd Stitik, MD

Other:

Revised 9-16-14

Notice of Subpoena

November 4, 2024

VIA E-MAIL:
Kamie T. Dominic, Esq.
Attorney for Renee Amos / The Hartford
Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

John Clifford Joseph King, Sr.
123 N. Louisiana Avenue
Lake Charles, LA 70601

Re: John Clifford King, Sr. vs. Renee Amos / The Hartford
State of Louisiana, No. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

Dear Ms. Dominic,

Pursuant to the Louisiana Code of Civil Procedure and applicable evidentiary statutes, this letter serves as formal notice of intent to issue subpoenas for the production of all electronic mail (including the complete content of email bodies, attachments, and any relevant written correspondence) relating to Calcasieu Parish Case Nos. 23-2124 and 2021-2773. This subpoenaed information is sought on behalf of John Clifford King, Sr., and pertains specifically to correspondence with or directed to the following individuals:

- Scott Hawkins, Esq, and Scott Hawkins and Associates
- Mark Judson, Executive Director, Southwest Louisiana Law Association
- Lakoshia Roberts, Esq., Southwest Louisiana Law Association Inc.
- Dustan J. Abshire, Esq., Abshire and Associates

Please find attached the **Notice of Production Only Subpoena** in relation to this request.

In accordance with La. Code Civ. Proc. arts. 1354 and 1355, please advise within seven (7) days from the date of this notice if there is any opposition to this subpoena. Additionally, given the recent procedural issues surrounding the filing of your motions on October 31, 2024, with service effected via “courtesy

copy" on November 1, 2024, in lieu of the mandated procedural timeline, I respectfully request a waiver of the seven-day objection period. The motions filed included, but were not limited to, Motions for Sanctions, motions concerning witness and evidence exclusion, and allegations of misconduct. All subpoenaed communications are critical to refuting these motions and supporting the position of the Plaintiff in the above-referenced cases.

I appreciate your timely attention to this matter. Please notify me at your earliest convenience if you consent to waive the objection period, or if you will require the full seven-day timeframe.

With kind regards, I remain,

Sincerely,

John Clifford J. King, Sr.
Pro Se Litigant
truekingfile@gmail.com

CC: File

Kent Castille <kcastille@cpso.com> Thu, Jul 28, 2022 at 9:59 AM
To: John King <johncjking86@gmail.com>

The case had been submitted to the District Attorney's Office for review. I am currently waiting for their decision.

From: John King <johncjking86@gmail.com>
Sent: Tuesday, July 26, 2022 4:15 PM
To: Kent Castille <kcastille@CPSO.COM>
Subject: Re: Insurance case [EXT]

Good Evening Mr Castillle,

It is now almost august and I haven't heard any updates.

State Farm admitted to wrong doing on one policy and reissued it back to my ownership as Charmaine forged the transfer and this was proven.

The second policy is still being investigated.

5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.

Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail



Gmail **True King <truekingfile@gmail.com>**

Fwd: Harris County Lab

4 messages

The Kings <fit4thekings@gmail.com> Thu, Nov 14, 2024 at 9:07 AM
To: truekingfile@gmail.com

---------- Forwarded message ---------
From: **Tay Jones** <msjonesbeaty@gmail.com>
Date: Thu, Nov 14, 2024 at 6:41 AM
Subject: Fwd: Harris County Lab
To: <fit4thekings@gmail.com>

---------- Forwarded message ---------
From: **Janet Barcelona** <JBarcelona@tomballtx.gov>
Date: Mon, Oct 1, 2018 at 4:49 PM
Subject: Harris County Lab
To: msjonesbeaty@gmail.com <msjonesbeaty@gmail.com>

The Harris County lab just called me back and they prefer to have a Buccal Swab from you to go with the bullet to the lab. So I will submit it on Friday this week.

Janet Barcelona

Property & Evidence Tech

Crime Scene Investigations

Tomball Police Department

Ph: (Direct) 281-290-1339

Fax: 281-351-2615

True King <truekingfile@gmail.com> Thu, Nov 14, 2024 at 9:09 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, True King <truekingfile@gmail.com>

Mrs King Protected crime victim off the record .
[Quoted text hidden]

True King <truekingfile@gmail.com> Thu, Nov 14, 2024 at 9:12 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, True King <truekingfile@gmail.com>

Address for crime victims services
[Quoted text hidden]

True King <truekingfile@gmail.com> Thu, Nov 14, 2024 at 9:38 AM
Draft To: True King <truekingfile@gmail.com>, Oliver Schrumpf <oschrumpf@schrumpf-law.com>

Crime scene investigations case has not been finalized .
[Quoted text hidden]

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601
  kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant’s Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis

I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant's **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), "excited utterance"**, and **La. C.E. Art. 803(3), "then-existing mental, emotional, or physical condition"**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses' statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant's claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Case # 23-2124
King Vs Amos The Hartford

Motions Continuance DismissQuash
10/31/2024

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the 31st day of October, 2024, at 6:58 o'clock AM/PM, Lake Charles, Louisiana.

5/31/24

signature

STATE OF LOUISIANA

Case # 23-2124 Motions Continuance DismissQuash
King Vs Amos The Hartford 10/31/2024

PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared **John CJ King Sr.**, who, after being duly sworn, did depose and say:

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical



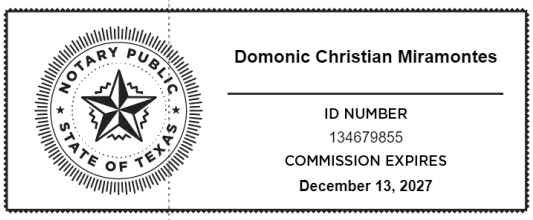
_____

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 10/31/2024

Number of Pages (including notarial certificate): 7



State of Texas

County of Bexar

This instrument was acknowledged before me by means of an interactive two-way audio and video communication on 10/31/2024 by John Clifford King.

EMERGENCY REQUEST FOR FEDERAL COURT CLERK

S J K
P.O. Box 12198
c/o L. Shunte Jones
Austin, TX 78711 2198
Email: kingshunte@gmail.com
Date: _____

Clerk of Court
U.S. District Court
Western District of Louisiana
Lake Charles Division
(337) 437 3871

Re: Request for Emergency Fax/Email Filing Authorization Under Local Rule 5.7.08

To the Clerk of Court:

I respectfully request emergency authorization to file my civil rights complaint today by fax or email, pursuant to Local Rule 5.7.08, due to urgent safety concerns and an expiring filing deadline.

I am proceeding pro se and under a pseudonym (S J K) because I am a documented crime victim enrolled in the Texas Attorney General Address Confidentiality Program (ACP). I cannot safely travel to Louisiana or appear in person, and disclosure of my physical location presents a direct and ongoing threat to my safety.

My filing is an emergency civil complaint under 42 U.S.C. 1983, seeking declaratory and injunctive relief against a Louisiana judicial officer involving continued retaliation, due process violations, and conduct that places me at risk of further harm. The circumstances require immediate filing today to preserve my rights and avoid irreparable injury.

Because I am pro se, I do not have CM/ECF access and cannot electronically file through the attorney portal. Under the circumstances, fax or email submission is the only safe, immediate, and feasible method available to me by today deadline.

Please note the following:

1. The original wet signed complaint, civil cover sheet, motions, and exhibits have been mailed to the Clerk Office, but will not arrive in time to satisfy today filing deadline.
2. A money order for the filing fee is being mailed separately, along with a wet signed copy of all filings.
3. I respectfully request that the Court accept my faxed or emailed filings today, with the understanding that the originals and payment are already en route.

Given my ACP status, safety considerations, and the emergency nature of this filing, I respectfully request immediate authorization to transmit my complaint package today by fax or secure email, with the assurance that the originals will follow by mail as required.

Thank you for your time, understanding, and assistance in ensuring my safety while preserving my right of access to the Court.

Respectfully,

S J K
Pro Se
Texas ACP Crime Victim
Email: kingshunte@gmail.com

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K et al
Plaintiffs

v

Hon Ronald C Richard et al
Defendants

FIRST AMENDED CIVIL RIGHTS COMPLAINT UNDER 42 U S C 1983

Submitted by
S J K and et al Plaintiffs proceeding under pseudonyms for safety and confidentiality

Date
November 10 2025

Filed in the

United States District Court

Western District of Louisiana

Lake Charles Division

MOTION TO PROCEED UNDER PSEUDONYM

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

MOTION TO PROCEED UNDER PSEUDONYM
AND TO FILE SERVICE ADDRESS UNDER SEAL

NOW COME Plaintiffs S J K and J K by and through themselves and respectfully move this Honorable Court for leave to proceed under pseudonyms and to file their service address under seal and as grounds state as follows

Plaintiffs are the victims of long term organized harassment impersonation identity theft cyber intrusion mail interception and threats which culminated in a violent home intrusion on December 11 2024.

II Plaintiff S J K is enrolled in the Texas Attorney General Crime Victims Program. The purpose of this program is to protect the confidentiality and safety of crime victims whose lives remain at risk.

III Plaintiffs have alleged that certain court officials and parish actors in Calcasieu Parish disclosed confidential information about Plaintiff S J K including her address despite warnings that such disclosure would place her at risk of serious harm.

IV Three weeks after Plaintiff S J K sought to protect her information a deadly home intrusion occurred at her family residence as described in the First Amended Civil Rights Complaint.

V Plaintiffs continue to experience digital surveillance cyberbanking interference Google Timeline tracking and threats connected to the events described in the Complaint.

VI Disclosure of Plaintiffs full names and current address in public filings would place them at grave risk of further physical harm stalking retaliation and harassment and would undermine the protections provided by the Texas Attorney General Crime Victims Program.

VII Federal courts have inherent authority to permit pseudonym filings and sealed addresses where a litigant's safety would be seriously endangered by disclosure of identifying information and where specific evidence of danger exists.

VIII Plaintiffs request permission to proceed under pseudonyms and to file their service address under seal to be available to the Clerk and to Defendants counsel pursuant to further order of this Court.

WHEREFORE Plaintiffs respectfully request that this Court

A Grant Plaintiffs leave to proceed under pseudonyms S J K and J K
B Authorize Plaintiffs to file their service address under seal with the Clerk
C Direct that Plaintiffs names and service address not appear in any public docket entry and
D Grant such other and further relief as the Court deems just and proper.

Respectfully submitted

Dated November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

AFFIDAVIT OF S J K

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

AFFIDAVIT OF S J K

I I am the Plaintiff identified in this case as S J K and I submit this affidavit in support of my First Amended Civil Rights Complaint and related motions.

II I am a protected crime victim enrolled in the Texas Attorney General Crime Victims Program. I have previously experienced attempts on my life and repeated stalking and harassment.

III I have personal knowledge of the facts stated in the First Amended Civil Rights Complaint except where statements are expressly based on information and belief. As to those matters I believe them to be true based on documents, records and communications in my possession.

IV I affirm that the events described in the Complaint including but not limited to unlawful detention in Lake Charles City Court denial of medical accommodations threats of contempt and jail fabricated service attempts suppression of filings interference with counsel denial of restraining orders refusal to investigate impersonation exposure of confidential victim information and the December 11 2024 home intrusion occurred thereafter substantially as alleged resulting in the shooting of intruder..

V I further affirm that the impersonation identity theft digital stalking cyberbanking interference mail interception and Google Timeline tracking described in the Complaint have occurred and are documented in records messages or other evidence that I am prepared to provide to the Court as needed.

VI I make this affidavit under penalty of perjury pursuant to 28 U S C section 1746.

Executed on November 10 2025
Location withheld for safety

S J K
Electronically signed
Plaintiff under pseudonym

MOTION FOR TRO AND PRELIMINARY INJUNCTION

MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

NOW COME Plaintiffs S J K and J K and move this Court for a temporary restraining order and preliminary injunction and in support state

I Plaintiffs incorporate all factual allegations of the First Amended Civil Rights Complaint.

II Plaintiffs face ongoing danger of retaliation, stalking, impersonation, digital intrusion and misuse of their personal information by or through Defendants in Calcasieu Parish.

III Plaintiffs have alleged that Defendants exposed confidential crime victim information and that within weeks a violent home intrusion occurred on December 11 2024 resulting in a death.

IV Plaintiffs further allege that Defendants continue to

A ignore impersonation and identity theft & slander & conspiracy
B suppress filings
C fabricate addresses
D threaten contempt and jail
E maintain unclear and ongoing proceedings in parish courts

V Plaintiffs are likely to succeed on the merits of their constitutional claims including violations of the First Fourth Ninth and Fourteenth Amendments and Monell claims against municipal entities.

VI Plaintiffs face irreparable harm in the form of further physical danger, emotional trauma, loss of parental rights and denial of access to the courts if relief is not granted.

VII The balance of equities favors Plaintiffs because the requested relief only requires Defendants to follow the law to protect crime victims, cease retaliation and refrain from using fabricated records.

VIII The public interest is served by protecting constitutional rights, ensuring integrity in judicial proceedings and ensuring that crime victims are not retraumatized by disclosure of confidential data.

WHEREFORE Plaintiffs respectfully request that this Court

A Issue a temporary restraining order prohibiting Defendants and their agents from
retaliating against Plaintiffs
disclosing Plaintiffs confidential identifying information
using fabricated addresses or service entries
and continuing any proceedings against Plaintiffs without clear jurisdiction and notice

B Set this matter for a hearing on preliminary injunction at the earliest practicable time and permit appearance of plaintiff by zoom for victims protection form further harm.

C After hearing issue a preliminary injunction continuing the protections requested above and

D Grant such other equitable relief as the Court deems just and proper.

Dated November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAKE CHARLES DIVISION

S J K under pseudonym

and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

ORDER REGARDING FIRST AMENDED CIVIL RIGHTS COMPLAINT

Before the Court is Plaintiffs First Amended Civil Rights Complaint filed pursuant to 42 U S C section 1983 seeking declaratory and injunctive relief against the above named Defendants.

The Court having considered the filing its accompanying affidavits and motions and recognizing that Plaintiffs proceed under pseudonyms for safety and confidentiality

IT IS ORDERED that the First Amended Civil Rights Complaint is hereby FILED into the record of this Court.

IT IS FURTHER ORDERED that Defendants shall file an answer or other responsive pleading within the time prescribed by the Federal Rules of Civil Procedure.

IT IS FURTHER ORDERED that the Clerk of Court shall ensure that Plaintiffs pseudonyms be used in all publicly accessible docket entries pending further order of this Court.

IT IS FURTHER ORDERED that Plaintiffs service address shall remain under seal pending the Courts ruling on the Motion to Proceed Under Pseudonym.

IT IS FURTHER ORDERED that this matter is referred to the assigned United States Magistrate Judge for further case management consistent with the Federal Rules of Civil Procedure and local rules of this Court.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

_____

UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____
Judge _____
Magistrate Judge _____

FIRST AMENDED CIVIL RIGHTS COMPLAINT
Filed Under Pseudonym For Safety And Confidentiality

I PARTIES

1 Plaintiff S J K is a United States citizen who proceeds under pseudonym due to active threats to her safety and confidentiality as a protected crime victim enrolled in the Texas Attorney General Crime Victims Program.

2 Plaintiff J K is the spouse of Plaintiff S J K and proceeds under pseudonym to protect the confidential identity and location of Plaintiff S J K.

3 Defendant Hon Ronald C Richard is the presiding judge of Lake Charles City Court Ward 3 and is sued in his official capacity for declaratory and injunctive relief only.

4 Defendant City of Lake Charles is responsible for the funding oversight and operation of Lake Charles City Court including personnel policies and court practices.

5 Defendant Lake Charles City Court Ward 3 is a municipal judicial entity responsible for courtroom procedures recordkeeping and actions undertaken by its judges, clerks and staff.

6 Defendant Calcasieu Parish Police Jury is the governing authority of Calcasieu Parish responsible for parish policies, supervision funding of parish departments and oversight of parish level judicial administrative and law enforcement functions.

7 Defendant Calcasieu Parish Clerk of Court is responsible for filing procedures docketing record management access to filings issuance of certified copies and handling of public court business.

8 Defendant Calcasieu Parish Sheriff is responsible for law enforcement service of process criminal investigation and protection of parish residents including crime victims.

9 Defendant Calcasieu Parish District Attorney is responsible for criminal prosecution, receipt of criminal complaints, investigation of impersonation fraud and review of criminal allegations affecting citizens.

10 Defendant Fourteenth Judicial District Court of Louisiana is responsible for family court criminal court and civil court adjudications including hearings restraining order determinations and judicial conduct.

11 Defendant Calcasieu Parish District Court Administrator oversees court administration scheduling judicial support staffing and compliance with judicial policies.

II JURISDICTION

12 This Court has jurisdiction under 28 U S C section 1331 and 28 U S C section 1343 because this action arises under the Constitution and laws of the United States including 42 U S C section 1983.

13 Declaratory and injunctive relief are authorized by 28 U S C sections 2201 and 2202.

14 Plaintiffs seek only prospective equitable and structural relief from judicial and official capacity defendants.

III VENUE

15 Venue is proper in the Western District of Louisiana under 28 U S C section 1391 because all events giving rise to this civil rights action occurred in Calcasieu Parish, Louisiana.

IV INTRODUCTION

16 This lawsuit arises from a sustained pattern of coordinated constitutional violations by Lake Charles City Court Calcasieu Parish government officials parish courts sheriff personnel district attorney personnel clerks magistrates and administrative officers.

17 Plaintiffs allege violations of the First Fourth Ninth and Fourteenth Amendments including unlawful detention suppression of filings deprivation of due process equal protection violations exposure of confidential crime victim information refusal to investigate crimes impersonation stalking identity theft and threats culminating in a violent home intrusion.

18 Plaintiffs seek declaratory injunctive and structural relief to stop ongoing retaliation, protect their rights and ensure future proceedings comply with the Constitution.

V FACTUAL ALLEGATIONS

Part 1 Lake Charles City Court and Judge Richard

19 Plaintiff J K filed a small claims case in August 2023 regarding a stolen automobile. Plaintiff S J K was not a party and had never filed any pleading in the case.

20 The case was reassigned internally to Judge Ronald C Richard without notice providing him full control over proceedings.

21 Plaintiff S J K had no involvement in the case and had never appeared, communicated or filed anything in Lake Charles City Court prior to Judge Richard inserting her name into the record.

22 Plaintiffs allege Judge Richard exerted jurisdiction over Plaintiff S J K without service without cause and without lawful authority.

23 Plaintiffs allege Judge Richard falsely accused Plaintiff S J K of practicing law although she had filed nothing and Plaintiff J K had used lawful document preparers.

24 Plaintiffs allege this accusation was retaliatory for Plaintiffs questioning the conduct of court clerks and the handling of filings.

25 At the time of these accusations Plaintiff S J K was in New Jersey caring for her spouse who had been hospitalized and temporarily paralyzed due to spinal cord injury.

VI MEDICAL CRISIS AND UNLAWFUL DETENTION

26 Plaintiffs allege medical records showed that travel created risk of permanent spinal injury for Plaintiff J K yet Judge Richard denied continuances and threatened jail for failure to appear.

27 Plaintiffs allege Plaintiff J K collapsed on the courtroom floor during the November 14 2024 hearing and was denied medical care.

28 Plaintiffs allege Judge Richard ordered court officers to lock the courtroom doors preventing Plaintiffs from leaving for medication or assistance.

29 Plaintiffs allege this constituted unlawful seizure and deliberate indifference to a serious medical need.

VII FAVORITISM AND RACIAL DISCRIMINATION

30 Plaintiffs allege Judge Richard told former counsel he did not want the opposing party held responsible because she lacked means and was acquainted with court staff.

31 Plaintiffs allege the opposing party was Caucasian and received favorable unlawful treatment while Plaintiffs who are Black received hostility, retaliation and unequal treatment.

32 Plaintiffs allege this establishes discriminatory motive in violation of the Fourteenth Amendment.

VIII FABRICATED ADDRESSES AND FALSE SERVICE ATTEMPTS

33 Plaintiffs allege Lake Charles City Court staff created fabricated addresses in Iowa Louisiana and falsely recorded service attempts at these locations.

34 Plaintiffs allege Plaintiffs have never lived in Iowa Louisiana and never provided any address in Iowa Louisiana to any court.

35 Plaintiffs allege fabricated service entries were used to increase court costs, create false records and justify adverse rulings.

36 Plaintiffs allege fabricated service continued even after Plaintiffs alerted the court in writing and through appeals.

IX EX PARTE COMMUNICATIONS BLOCKING COUNSEL

37 Plaintiffs allege several attorneys reported that Lake Charles City Court staff warned them not to enroll because Judge Richard would retaliate.

38 Plaintiffs allege at least four attorneys communicated they were discouraged from enrolling due to off record interference by court staff.

39 Plaintiffs allege such interference deprived Plaintiffs of their right to counsel.

40 Plaintiffs allege former counsel withdrew after repeated intimidation by Lake Charles City Court staff.

41 Plaintiffs allege Judge Richard retaliated further after learning Plaintiffs had consulted additional attorneys.

X SUPPRESSION OF FILINGS

42 Plaintiffs allege Lake Charles City Court clerks suppressed filings including motions for continuance emergency medical documentation and objections to improper rulings.

43 Plaintiffs allege motions were withheld mislabeled or refused without lawful basis.

44 Plaintiffs allege these actions denied fair process and access to the court.

XI RETALIATION BY JUDGE RICHARD

45 Plaintiffs allege Judge Richard retaliated against Plaintiffs by escalating threats, accusations and invented charges after Plaintiffs raised concerns about court staff misconduct.

46 Plaintiffs allege Plaintiff J K was threatened with jail if he did not retract truthful statements made regarding the Spring 2024 chamber hearing where Judge Richard stated he did not want the opposing party punished.

47 Plaintiffs allege Plaintiff J K refused to recant and Judge Richard increased retaliation as a result.

XII APPEAL INTERFERENCE AND FALSE STATEMENTS

48 Plaintiffs allege after Plaintiff J K filed an appeal Judge Richard unlawfully continued issuing orders including increasing fees forcing counsel to appear and creating new contempt accusations.

49 Plaintiffs allege Judge Richard made false statements to the Louisiana Third Circuit about Plaintiffs including denying the December 11 home intrusion occurred.

50 Plaintiffs allege such actions obstructed appellate oversight and distorted the record.

XIII FOURTEENTH JUDICIAL DISTRICT COURT MISCONDUCT

A Denial of Restraining Orders and Forced False Statements

51 Plaintiffs allege a Fourteenth Judicial District Court judge denied lawful restraining orders requested by Plaintiff J K despite clear evidence of threats, impersonation and harassment.

52 Plaintiffs allege the judge forced Plaintiff J K to swear to statements the judge knew were false including a statement that Plaintiffs could not obtain restraining orders anywhere in the United States.

53 Plaintiffs allege such statements exceeded the judge’s authority and violated constitutional rights.

B Untimely Filings Accepted Against Plaintiffs

54 Plaintiffs allege the Fourteenth Judicial District Court accepted untimely filings from opposing individuals without requiring compliance with procedural rules.

55 Plaintiffs allege Plaintiffs motions were denied or ignored despite being properly submitted.

56 Plaintiffs allege this unequal treatment demonstrates discriminatory motive and denial of due process.

C Trial With No Charges Stated

57 Plaintiffs allege Plaintiff J K was repeatedly placed on trial with no statement of charges, issues or claims being adjudicated.

58 Plaintiffs allege Plaintiff J K requested clarification in writing and orally and the court refused to identify any basis for the hearings.

59 Plaintiffs allege such refusal prevented Plaintiff from securing counsel or preparing any defense.

D Use of Criminal Allegations in Family Court Without Charges

60 Plaintiffs allege parish judges inserted criminal allegations into family court orders without any criminal process.

61 Plaintiffs allege such actions were unconstitutional and resulted in family separation and ongoing harm.

E Ex Parte Communications by Parish Clerks

62 Plaintiffs allege Fourteenth Judicial District Court clerks engaged in ex parte communication with opposing individuals including those hostile to Plaintiffs.

63 Plaintiffs allege clerks withheld filings, transcripts and orders from Plaintiffs while distributing information to others.

64 Plaintiffs allege these clerks acted with bias and participated in coordinated retaliation.

F Refusal to Enforce Court Orders Favorable to Plaintiffs

65 Plaintiffs allege the Fourteenth Judicial District Court refused to enforce its own orders when enforcement would protect Plaintiffs.

66 Plaintiffs allege the court selectively enforced only those orders that harmed Plaintiffs.

XIV CALCASIEU PARISH SHERIFF FAILURE TO PROTECT

67 Plaintiffs allege the Sheriff’s Office refused to investigate impersonation stalking threats and identity theft despite repeated reports.

68 Plaintiffs allege deputies refused to interview identified suspects even when Plaintiffs provided evidence including photographs, videos , messages and witness statements.

69 Plaintiffs allege the Sheriff's Office made false legal statements including that anybody can get a life insurance policy on anybody causing additional fear given the context of threats.

70 Plaintiffs allege the Sheriff's Office failed to classify incidents properly, failed to file reports and failed to follow investigatory procedure.

XV DISTRICT ATTORNEY FAILURE TO INVESTIGATE IMPERSONATION

71 Plaintiffs allege the District Attorney and Assistant District Attorneys were provided clear evidence of impersonation and ongoing criminal violations yet refused to investigate.

72 Plaintiffs allege the ADA Office made no attempts to identify or question the impersonator.

73 Plaintiffs allege such refusal to act allowed impersonation to continue harming Plaintiffs across states.

XVI DECEMBER 11 2024 HOME INVASION CAUSED BY DEFENDANTS

74 Plaintiffs allege that on December 11 2024 an intruder entered Plaintiffs home placing their lives in immediate danger.

75 Plaintiffs allege the intrusion occurred after Defendants exposed Plaintiff S J K's confidential address despite warnings that disclosure endangered her life.

76 Plaintiffs allege Defendants maliciously disclosed the address withdrawing protections guaranteed to a crime victim.

77 Plaintiffs allege the intrusion caused permanent trauma including inability to travel to Louisiana and continuous fear.

XVII CYBER INTRUSION MAIL INTERCEPTION AND DIGITAL TRACKING

78 Plaintiffs allege Defendants ignored evidence that Plaintiffs were subjected to cyberbanking interference, illegal text forwarding hacking of USPS mail tracking Google Timeline surveillance and continuous digital monitoring.

79 Plaintiffs allege court officers concealed evidence of such stalking and used illegally obtained data to intimidate Plaintiffs.

80 Plaintiffs allege these acts constitute unlawful intrusion and state created danger.

XVIII SUPERVISORY WRIT RULING IN PLAINTIFFS FAVOR

81 Plaintiffs allege the Louisiana Third Circuit Court of Appeal granted a supervisory writ on February 6 2025 confirming Judge Richard had been divested of jurisdiction and all actions after Plaintiffs appeal were void.

82 Plaintiffs allege the appellate ruling confirmed misconduct and disregard for jurisdictional limits.

XIX CONTINUING RETALIATION AND COORDINATED HARASSMENT

83 Plaintiffs allege that beginning in 2022 and continuing through 2025 they experienced coordinated retaliation across multiple Calcasieu Parish agencies including courts clerks, sheriff deputies, district attorney staff and city court officials.

84 Plaintiffs allege multiple county and parish employees communicated off record about Plaintiffs cases as confirmed by an officer of the court who admitted in January 2025 that every judge in the county knows now indicating widespread ex parte discussion.

85 Plaintiffs allege this coordination resulted in harassment, stalking , denial of access to justice, manipulation of filings and suppression of evidence.

86 Plaintiffs allege these acts occurred after Plaintiffs sought justice regarding a stolen automobile and after Plaintiffs reported impersonation fraud and criminal interference.

XX FALSE CRIMINALIZATION OF PLAINTIFFS

87 Plaintiffs allege Judge Richard fabricated a contempt charge against Plaintiff S J K several days after a hearing to intimidate her and deter her from testifying on behalf of her spouse.

88 Plaintiffs allege Plaintiff S J K had never appeared in court, never filed anything in the case and had no notice of any alleged violation.

89 Plaintiffs allege Plaintiff S J K was accused without evidence of practicing law despite having never signed or submitted any pleadings in Lake Charles City Court.

90 Plaintiffs allege these unlawful accusations were made solely to harm and silence her.

XXI MISUSE OF AUTHORITY TO INFLICT PERSONAL HARM

91 Plaintiffs allege Judge Richard repeatedly stated his intent to teach them a lesson and threatened jail without lawful grounds.

92 Plaintiffs allege Judge Richard blocked the courtroom exit on November 14 2024 and refused to allow Plaintiffs to leave to seek medication or assistance.

93 Plaintiffs allege this was a knowing violation of Plaintiffs Fourth and Fourteenth Amendment rights.

XXII DELIBERATE INDIFFERENCE TO MEDICAL NEEDS

94 Plaintiffs allege Plaintiff J K was in medical crisis during the November 14 2024 hearing visibly collapsing exhibiting symptoms of spinal nerve compression seizure like inability to stand or walk.

95 Plaintiffs allege Judge Richard ignored these medical emergencies, refused medication breaks and proceeded with hearing while Plaintiff lay on the floor.

96 Plaintiffs allege these actions caused lasting harm and increased spinal damage.

XXIII DENIAL OF RIGHT TO TESTIFY AND PRESENT EVIDENCE

97 Plaintiffs allege Judge Richard refused to permit Plaintiff J K to testify in his own defense.

98 Plaintiffs allege Judge Richard allowed opposing counsel to submit unauthenticated print outs while refusing to admit Plaintiffs evidence even when originals were provided.

99 Plaintiffs allege this deprived Plaintiffs of due process and equal protection.

XXIV IMPROPER INVOLVEMENT OF OUTSIDE INDIVIDUALS

100 Plaintiffs allege several unrelated attorneys and court officers appeared inside closed proceedings despite not representing any party.

101 Plaintiffs allege one individual was the attorney for a person who had previously harassed Plaintiffs and was permitted to sit in the courtroom though the public had been cleared.

102 Plaintiffs allege these appearances were intimidating and violated procedural rules.

XXV IMPACT OF DEFENDANTS ACTIONS ON PLAINTIFFS LIVES

103 Plaintiffs allege Defendants conduct caused ongoing trauma, severe emotional distress, inability to travel to Louisiana, loss of parental rights, loss of financial security, professional harm and continual fear for personal safety.

104 Plaintiffs allege the home intrusion on December 11 2024 was the foreseeable result of Defendants exposing confidential victim information.

105 Plaintiffs allege the intrusion permanently affected their ability to sleep, work , travel or feel safe and remains a source of terror.

106 Plaintiffs allege Defendants refusal to act on identity theft allowed impersonators to continue attacking Plaintiffs credit records, financial accounts, mail and employment.

XXVI CAUSES OF ACTION

COUNT 1
VIOLATION OF FOURTEENTH AMENDMENT PROCEDURAL DUE PROCESS

107 Plaintiffs incorporate all prior paragraphs.

108 Defendants deprived Plaintiffs of notice service opportunity to be heard and fair procedure.

109 Plaintiffs were placed on trial without charges, denied counsel, denied access to filings and given fabricated addresses.

110 These actions violated the Fourteenth Amendment.

COUNT 2
FOURTEENTH AMENDMENT EQUAL PROTECTION VIOLATIONS

111 Plaintiffs incorporate all prior paragraphs.

112 Plaintiffs were treated less favorably than similarly situated parties including the opposing party who received repeated procedural leniency.

113 Plaintiffs allege discrimination based on race and animus.

COUNT 3
FOURTH AMENDMENT UNLAWFUL DETENTION

114 Plaintiffs incorporate all prior paragraphs.

115 Judge Richard locked Plaintiffs in the courtroom preventing medical access constituting an unreasonable seizure.

COUNT 4
FIRST AMENDMENT RETALIATION

116 Plaintiffs incorporate all prior paragraphs.

117 Plaintiffs exercised their right to petition for redress by questioning misconduct.

118 In response Defendants escalated threats, increased fees created false charges intimidated attorneys and blocked access to filings.

COUNT 5
NINTH AMENDMENT RIGHT TO PRIVACY

119 Plaintiffs incorporate all prior paragraphs.

120 Defendants unlawfully exposed confidential crime victim information resulting in a violent home intrusion.

COUNT 6
STATE CREATED DANGER
FOURTEENTH AMENDMENT SUBSTANTIVE DUE PROCESS

121 Plaintiffs incorporate all prior paragraphs.

122 Defendants affirmative actions created and increased danger to Plaintiffs and directly preceded the December 11 2024 home intrusion.

COUNT 7
FAILURE TO INVESTIGATE AND PROTECT
AGAINST THE SHERIFF AND DISTRICT ATTORNEY

123 Plaintiffs incorporate all prior paragraphs.

124 Defendants refused to investigate impersonation threats, stalking and identity theft.

125 Defendants' failure to act allowed the danger to escalate.

COUNT 8
MONELL LIABILITY
AGAINST CITY OF LAKE CHARLES AND CALCASIEU PARISH POLICE JURY

126 Defendants engaged in conspiracy, slander,libel, and unethical ex parte communication.

127 Defendants maintained customs policies and practices that violated constitutional rights including suppression of filings, intimidation of counsel ex parte communications and refusal to investigate crimes.

COUNT 9
DECLARATORY JUDGMENT

128 Plaintiffs seek a declaration that Defendants practices described herein violate federal constitutional rights.

COUNT 10
INJUNCTIVE RELIEF
PROSPECTIVE ONLY

129 Plaintiffs seek a permanent injunction prohibiting future retaliation suppression of filings misuse of confidential information and unlawful detention.

XXVII PRAYER FOR RELIEF

130 Plaintiffs incorporate all prior paragraphs.

131 Plaintiffs respectfully request that this Court enter judgment in their favor and award the following prospective declaratory and injunctive relief.

132 A declaration pursuant to 28 U S C sections 2201 and 2202 that Defendants conduct described herein violates the First Fourth Ninth and Fourteenth Amendments to the United States Constitution.

133 A declaration that Judge Ronald C Richard and Lake Charles City Court violated Plaintiffs due process rights by exercising jurisdiction without service manufacturing accusations blocking medical access suppressing filings intimidating counsel fabricating addresses and retaliating against Plaintiffs.

134 A declaration that the Calcasieu Parish Police Jury, Calcasieu Parish Clerk, Calcasieu Parish Sheriff, and Calcasieu Parish District Attorney maintained unconstitutional customs practices and policies that violated Plaintiffs rights including refusal to investigate threats impersonation cyber intrusion stalking identity theft and related crimes.

135 A permanent injunction prohibiting Judge Richard Lake Charles City Court Calcasieu Parish Police Jury Calcasieu Parish Clerk Calcasieu Parish Sheriff and Calcasieu Parish District Attorney from engaging in retaliation ex parte communication suppression of filings unlawful detention misuse of confidential crime victim information discriminatory treatment and denial of medical accommodation.

136 A permanent injunction requiring the Calcasieu Parish Sheriff to conduct a full and thorough investigation into the individual or individuals impersonating Plaintiffs engaging in forgery, cyber intrusion, mail interception stalking and the illegal transfer of Plaintiffs property and financial instruments.

137 A requirement that the Calcasieu Parish District Attorney identify, charge and prosecute the individual or individuals responsible for impersonation identity theft forgery fraud and related criminal acts as recognized by Defendants own records and statements.

138 An order requiring the City of Lake Charles Calcasieu Parish Police Jury and Lake Charles City Court to correct all fabricated service entries, remove all invalid court costs, remove all fees associated with fictitious addresses and update Plaintiffs records to reflect accurate procedural history.

139 An order requiring the Calcasieu Parish Clerk of Court to properly file the March 2024 court order with transcript attached to reflect the true judicial demand date of July 2021 and to correct all inaccuracies including unauthorized provisions added without transcript basis.

140 An order prohibiting Defendants from interfering with Plaintiffs parenting rights requiring future proceedings to comply with due process and requiring equal enforcement of all court orders including enforcement of orders favorable to Plaintiffs.

141 An order requiring all individuals who engaged in impersonation forgery identity theft and theft of Plaintiffs vehicle and assets to undergo psychological evaluations and prohibiting all contact with Plaintiffs.

142 A permanent no contact order between Plaintiffs and any individual persons identified as participants in impersonation forgery stalking or harassment.

143 A change of venue for all ongoing matters involving Plaintiffs in Calcasieu Parish to prevent further retaliation, intimidation and constitutional violations.

144 A public acknowledgment or apology from Lake Charles City Court Ward 3 and Judge Ronald C Richard acknowledging misconduct including the improper December 30 2024 hearing convened while the case was divested.

145 Any additional equitable relief this Court deems just and proper to prevent further irreparable harm.

XXVIII VERIFICATION PURSUANT TO 28 U S C SECTION 1746

146 I Plaintiff S J K declare under penalty of perjury that I have read this First Amended Civil Rights Complaint and that the facts stated herein are true and correct to the best of my knowledge, information and belief.

Executed on November 10 2025
Location withheld for safety

S J K
Electronically signed
Plaintiff under pseudonym

XXIX PSEUDONYM DECLARATION

147 I Plaintiff S J K certify that I am a protected crime victim enrolled in the Texas Attorney General Crime Victims Program.

148 Disclosure of my full name or address would place me in grave danger of further stalking, impersonation retaliation and physical harm.

149 I therefore proceed under pseudonym and request that identifying information remain sealed or filed under seal in accordance with court order.

Executed on November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

XXX CERTIFICATE OF SERVICE

150 I certify that on November 10 2025 a true and correct copy of this First Amended Civil Rights Complaint will be served on each Defendant by United States Mail or as otherwise permitted by Federal Rule of Civil Procedure 5.

151 Plaintiffs proceed under pseudonyms. Plaintiffs service address is filed under seal pursuant to Court order.

152 Copies will be served on

Hon Ronald C Richard
Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

City of Lake Charles
1001 Ryan Street
Lake Charles Louisiana 70601

Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

Calcasieu Parish Police Jury
1015 Pithon Street
Lake Charles Louisiana 70601

Calcasieu Parish Clerk of Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish Sheriff
5400 East Broad Street
Lake Charles Louisiana 70615

Calcasieu Parish District Attorney
1020 Ryan Street
Lake Charles Louisiana 70601

Fourteenth Judicial District Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish District Court Administrator
1000 Ryan Street
Lake Charles Louisiana 70601

Executed on November 10 2025

S J K
Electronically signed
Plaintiff under pseudonym

FOOTNOTES

1 FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION protects the right to petition the government for redress and prohibits retaliation for exercising that right.

2 FOURTH AMENDMENT TO THE UNITED STATES CONSTITUTION prohibits unreasonable seizures including unlawful detention.

3 FOURTEENTH AMENDMENT TO THE UNITED STATES CONSTITUTION guarantees due process equal protection and substantive protections.

4 NINTH AMENDMENT protects unenumerated rights including privacy and personal safety.

5 42 U S C SECTION 1983 provides a cause of action for deprivation of constitutional rights under color of state law.

6 28 U S C SECTIONS 2201 AND 2202 authorize declaratory and injunctive relief.

7 LOUISIANA CONSTITUTION ARTICLE I SECTION 2 guarantees due process.

8 LOUISIANA CONSTITUTION ARTICLE I SECTION 3 prohibits arbitrary discrimination.

9 LOUISIANA REVISED STATUTES TITLE 46 SECTION 1844 provides crime victim confidentiality protection.

10 LOUISIANA REVISED STATUTES TITLE 14 SECTION 72 addresses forgery.

11 LOUISIANA REVISED STATUTES TITLE 14 SECTION 67 addresses theft.

12 LOUISIANA REVISED STATUTES TITLE 14 SECTION 73 addresses computer fraud.

13 STATE CREATED DANGER DOCTRINE recognizes liability where officials create or increase danger.

14 MONELL LIABILITY under 42 U S C SECTION 1983 holds municipalities liable for unconstitutional practices.

15 OFFICIAL CAPACITY SUITS treat actions against officials as actions against the governmental entity.

16 PSEUDONYM FILINGS permitted where disclosure threatens safety. SK

Verified by pdfFiller
11/13/2025

PROPOSED ORDER GRANTING PSEUDONYM

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

S J K under pseudonym
and
J K under pseudonym
Plaintiffs

v

Hon Ronald C Richard in his official capacity
City of Lake Charles
Lake Charles City Court Ward 3
Calcasieu Parish Police Jury
Calcasieu Parish Clerk of Court
Calcasieu Parish Sheriff in his official capacity
Calcasieu Parish District Attorney in official capacity
Fourteenth Judicial District Court of Louisiana
Calcasieu Parish District Court Administrator in official capacity
Defendants

Civil Action No _____

PROPOSED ORDER GRANTING LEAVE TO PROCEED UNDER PSEUDONYM AND TO FILE SERVICE ADDRESS UNDER SEAL

Considering Plaintiffs Motion to Proceed Under Pseudonym and to File Service Address Under Seal and the showing of good cause therein

IT IS ORDERED that the Motion is GRANTED.

IT IS FURTHER ORDERED that Plaintiffs may proceed in this action under the pseudonyms S J K and J K.

IT IS FURTHER ORDERED that Plaintiffs service address shall be filed under seal with the Clerk of Court and shall not appear on the public docket.

IT IS FURTHER ORDERED that Plaintiffs full names and service address shall be disclosed only as necessary to the Court and to counsel of record subject to any further protective order that may be entered.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

_____

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

CERTIFICATE OF SERVICE

I certify that on November 10 2025 I will cause a true and correct copy of the following documents

First Amended Civil Rights Complaint
Affidavit of S J K
Motion to Proceed Under Pseudonym
Proposed Order Granting Pseudonym
Motion for Temporary Restraining Order and Preliminary Injunction
Proposed Order for Temporary Restraining Order and Preliminary Injunction

to be served by United States Mail or other method authorized by Federal Rule of Civil Procedure 5 on the following

Hon Ronald C Richard
Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

City of Lake Charles
1001 Ryan Street
Lake Charles Louisiana 70601

Lake Charles City Court Ward 3
118 West Mill Street
Lake Charles Louisiana 70601

Calcasieu Parish Police Jury
1015 Pithon Street
Lake Charles Louisiana 70601

Calcasieu Parish Clerk of Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish Sheriff
5400 East Broad Street
Lake Charles Louisiana 70615

Calcasieu Parish District Attorney
1020 Ryan Street
Lake Charles Louisiana 70601

Fourteenth Judicial District Court
1000 Ryan Street
Lake Charles Louisiana 70601

Calcasieu Parish District Court Administrator
1000 Ryan Street
Lake Charles Louisiana 70601

Plaintiffs appear under pseudonyms. Plaintiffs service address is filed under seal with the Clerk of Court pursuant to Court order.

Executed on November 10 2025

S J K

Verified by pdfFiller
11/13/2025

Electronically signed
Plaintiff under pseudonym

PROPOSED ORDER FOR TRO AND PRELIMINARY INJUNCTION

PROPOSED ORDER
GRANTING TEMPORARY RESTRAINING ORDER
AND SETTING HEARING ON PRELIMINARY INJUNCTION

Considering Plaintiffs Motion for Temporary Restraining Order and Preliminary Injunction and the showing made therein

IT IS ORDERED that the Motion is GRANTED IN PART as follows

1 Defendants and their officers agents servants employees and all persons in active concert or participation with them are hereby temporarily restrained from

A Retaliating against Plaintiffs for filing or pursuing this action
B Disclosing Plaintiffs confidential personal identifying information including any address filed under seal
C Relying on or further recording fabricated addresses or fabricated service entries associated with Plaintiffs
D Using illegally obtained digital or mail based information to harass or intimidate Plaintiffs.

E. Contacting the plaintiffs in any method of communication.

F. Bullying, stalking, harassing of plaintiffs family members.

E. Refrain from any contact or retaliation against plaintiffs children.

2 Defendants are ORDERED to preserve all records, electronic data emails and files referenced in Plaintiffs Complaint.

3 A hearing on Plaintiff's request for a preliminary injunction is set for the _____ day of _____ 2025 at _____ in the United States District Court for the Western District of Louisiana Lake Charles Division.

THUS DONE AND SIGNED in Lake Charles Louisiana this _____ day of _____ 2025.

UNITED STATES DISTRICT JUDGE

Transcript evidence of impersonation

From: True King <truekingfile@gmail.com>

To: Kent Castille <kcastille@cpso.com>

Date: Thu, 02 Jan 2025 15:29:15 -0500

Attachments:
Transcript pages 32-72.pdf

Judge ruled I was not in Louisiana at time of notary forgery.

There are multiple crimes that are occurring and here is the evidence on transcript

Paralegal to Oliver “Jackson” Schrumpf

Schrumpf Law Office, PLC
3801 Maplewood Drive
Sulphur, LA 70663
(337) 625-9077
(337) 625-8231 (fax)

If you have not executed a binding fee agreement or an agreement for representation, this firm does not represent you and this email is not an agreement of representation.

Please note that unless expressly stated otherwise, I have NOT expressly designated my email address as appropriate for electronic service of a pleading or other writing under LA CCP 1313.

Confidentiality Statement: This e-mail transmission, and any documents, files, or e-mail messages attached to it, may contain confidential information that is attorney work product and/or legally privileged. The information herein is also protected by the Electronic Communications Privacy Act, 18 U.S.C.A. 2510-2521. The information contained in this message and any file transmitted with it is transmitted in this form based upon a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. If you are not the intended recipient, or the person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify sender immediately via return email or by telephone at (337) 625-9077 and destroy the original transmission and its attachments without reading them or saving them to disk or otherwise. Thank you.

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

RE: Transcript Impersonation Case # 24-118583

From: Kent Castille <kcastille@CPSO.COM>

To: 'True King' <truekingfile@gmail.com>

Date: Thu, 02 Jan 2025 20:54:47 +0000

The documents you previously submitted to me in December of 2024 were attached to a report and forwarded to the District Attorney's Office. As of now, I have not received any documentation of the District Attorney's Office's ruling regarding the stated documents. Please contact the District Attorney's Office if you have any additional inquiries. Thank you.

From: True King <truekingfile@gmail.com>
Sent: Thursday, January 2, 2025 2:31 PM
To: Kent Castille <kcastille@CPSO.COM>
Subject: : Transcript Impersonation Case # 24-118583

3 part transcript . Evidence is undeniable there continues to be third person fraud please provide update on my case please ---------- Forwarded message --------- From: Jinnifer LeBlanc <jleblanc@ schrumpf-law. com> Date: Thu, Dec 26, 2024

3 part transcript . Evidence is undeniable there continues to be third person fraud please provide update on my case please

---------- Forwarded message ---------
From: Jinnifer LeBlanc <jleblanc@schrumpf-law.com<mailto:jleblanc@schrumpf-law.com>>
Date: Thu, Dec 26, 2024 at 1:35 PM
Subject: Transcript
To: True King <truekingfile@gmail.com<mailto:truekingfile@gmail.com>>

Thank you,
Jinnifer Marcantel
Paralegal to Oliver "Jackson" Schrumpf

Schrumpf Law Office, PLC
3801 Maplewood Drive
Sulphur, LA 70663
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LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING Plaintiff	*	
VERSUS	*	NO. 23-2124
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 Defendant	*	

* *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 14th day of November 2024, beginning at 11:00 a.m.

APPEARANCES

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P-2 Copy of ID of Charmaine Colston 19

P-3 Copy of front of Vehicle Title 28

P-9 Copy of SWLA Credit Union Transaction Details 61

P-10 Copy of GEICO Declarations Page 63

DEFENDANTS' EXHIBITS:

None

PROFFERS

BY PLAINTIFF:

Proffer-1
Copy of CrossFit check-in dated 9-7-21 (previous marked as plaintiff exhibit 4) 30, 114

Proffer-2
Copy of CrossFit check-in dated 9-8-21 (previous marked as plaintiff exhibit 5) 34, 114

Proffer-3
Affidavit of CrossFit (previous marked as plaintiff exhibit 6) ... 38, 114

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* * *

PROCEEDINGS

* * *

COURT CALLED TO ORDER

* * *

THE COURT:

Good morning everyone. We have a number of things on the docket. I'm gonna try to move the, what I would call the quickie stuff, uh, and so I believe we have an eviction matter on the docket.

* * *

OTHER MATTERS CALLED

* * *

THE COURT:

All right. You may be seated. All right, counselors do we have everybody here? Do we ... I'm gonna call the matter of John Clifford J King versus Renee Amos, docket number 23-2124. Looks like we all have counselors here. All right, counselors make your appearance and then we'll have the witnesses sworn in.

MS. DOMINIC:

Good morning Your Honor. Kamie Dominic

on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

All right. Oliver?

MR. SCHRUMPF:

Oliver Shrumpf for John Clifford King.

THE COURT:

All right, now, Miss Amos, please raise your right hand. Mr. King, uh, you stay seated. I know you got your back. Raise your right hand, let's get you sworn in. Oh whoa, whoa, we got another witness. Any other witnesses in here? You a witness sir?

MS. DOMINIC:

No.

THE COURT:

Where's Ms. King?

MR. SCHRUMPF:

Ms. King is outside.

MR. KING:

In the lobby.

THE COURT:

Let's ... let's grab her real quick. We'll just get everybody sworn in at one time and that way we get it knocked out.

MS. DOMINIC:

And Your Honor, and then any witnesses besides Mr. King and my client, ask to be sequestered from the courtroom.

THE COURT:

Okay. No problem. No problem. We gonna do that and I can give them the sequestration speech when they come in. Just FYI, my staff, uh, we have ordered lunch and we will eat right through trial, uh, because I think we can move this along rather quickly. But, we hadn't had breakfast since 6:30 and we hungry. All right, now we got her in here ... all right, ma'am give us your full ... well, let me get you sworn in first and then we can ... all right, everybody raise your right hand.

(THREE WITNESSES SWORN)

* * *

RENEE AMOS

JOHN CLIFFORD J KING

SHUNTE KING

* * *

Witnesses called on behalf of the plaintiff, John Clifford J King and on behalf of the defendant, Renee Amos Notary Public

Notary ID# 29374, having been duly sworn by the Deputy Clerk of Court, were examined, and testified on their oath as follows:

THE COURT:

All right. So, I've got them, uh, uh, notified ... ma'am, give us your full name for the record real quick. Just speak loudly towards the microphone.

MRS. KING:

My name is Shunte Jones King.

THE COURT:

All right. Good deal. All right, Ms. King, what we're gonna do is, uh, he's a witness, she's a witness, but they're also parties so they get to stay in the room. You're a witness ... are you a witness? Okay, so, uh, you're gonna be put under what's called the rule of sequestration. That means you got to sit outside in the lobby and hang out until it's ... you're called to get on the witness stand. After you get on the witness stand and they're done with you, then you get to stay in the courtroom, okay? So you're gonna have to just take a seat outside and hang out until they call you in.

MRS. KING:

I'm supposed to bring something to your attention. I'm required by law, uh, by the state attorney general to ...

THE COURT:

Not right now. We'll do that when I bring you in, okay?

MRS. KING:

Okay.

THE COURT:

The rule of sequestration is in effect. Please remove yourself to the lobby. All right. All parties may have a seat. Now, uh, Mr. Schrumpf, you're the moving party with the plaintiff. So, uh, the ball is in your court and the way we're set up here with minimum number of witnesses, uh, I suggest we just keep everybody in their seats. Makes it easier, plus I don't want Mr. King having to come up and down where the witness stand is, okay? And just everybody remember, speak to the microphone. Mr. King, you got to get it to the microphone. Ms. Amos, got to get it to the microphone, okay? All right, go ahead Mr. Schrumpf.

MR. SCHRUMPF:

Your Honor ...

THE COURT:

... Any pretrial matters we need to address?

MR. SCHRUMPF:

Did you receive the pretrial memo that I sent?

THE COURT:

I did. I've received your pretrial memorandum.

MR. SCHRUMPF:

Okay.

THE COURT:

I've reviewed it ...

MS. DOMINIC:

And Your Honor, at this time, I would like to object to certain things that's in the pretrial brief. I wasn't ... my understanding it wasn't required of the Court ...

THE COURT:

It was not required.

MS. DOMINIC:

But I do ... oh so sorry.

THE COURT:

Get that mic. Sorry.

MS. DOMINIC:

Sorry. As I was saying Your Honor, I would like to object to certain things that's in a pretrial brief. As I ... as I mentioned, it wasn't a requirement of the Court but I am requesting, uh, to the Court to strike the mention of the fifteen thousand (15,000) purchase price from the pretrial brief due to lack of supporting evidence. Uh, the fifteen thousand (15,000) was due to the purchase ...

THE COURT:

.. let me, let me ...

MS. DOMINIC:

... alleged purchase price.

THE COURT:

Let me cut you off real, real quick. The pretrial brief is not evidence.

MS. DOMINIC:

Okay.

THE COURT:

It is not considered as such. I don't think it was actually even filed into the record. It was just provided to the Court 'cuz

that's what pretrial briefs generally are done. I'm sorry ma'am. I'm not worried about the pretrial brief. It don't mean anything to me one way or the other. It's just one side's way of kind of saying, hey here's what we're gonna do and here's what we think. It's got to get on here under oath before it means squat diddly to me, so don't ... I'm ...

MS. DOMINIC:

Yes Your Honor.

THE COURT:

... I'm just going to disabuse you of your concerns. You don't have to worry about that.

MS. DOMINIC:

Thank you Your Honor.

THE COURT:

Okay. So don't ... don't sweat that. Do we have any other pretrial matters? Any agreement on evidence? Anything of that nature?

MS. DOMINIC:

No Your Honor.

THE COURT:

You don't' have anything? Okay, well

let's get this party started. Go ahead Mr. Schrumpf.

MR. SCHRUMPF:

I'd like to call Renee Amos under cross examination.

THE COURT:

Okay. Now, Ms. Amos let me ... your lawyer will tell you this but let me give you sort of the quickie protocol. He's calling you as a witness under what's cross examination. He's not calling you under direct examination. That means he basically gets to treat you as a hostile witness in the sense of he gets to ask some leading questions and he gets to do things a little differently than he would be allowed to do, say with his own client, under direct examination. So, listen to the question. Answer the question to the best you can. If you're unsure, you have counsel. Look at counsel, uh, and I caution both sides. If you're testifying in any way Ms. Amos or Mr. King and your lawyer starts talking, quit talking all right? He's trying to, she's trying to do her job. Be quiet and let them do their job, okay? All right. Go ahead.

MR. SCHRUMPF:

May I approach?

THE COURT:

Yes sir. Thank you Ollie. It'd be nice if the judge can see some stuff.

MR. SCHRUMPF:

I'm gonna do it.

THE COURT:

Merci bon. Let me see ...

* * *

RENEE AMOS

* * *

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on her oath as follows:

* * *

CROSS EXAMINATION

BY MR. SCHRUMPF:

Q. Ms. Amos, please state your full name.

A. Renee Amos.

Q. And, what is your address?

A. I beg your pardon.

Q. Your address?

A. 1208 17th Street, Lake Charles, Louisiana.

Q. Are you a Louisiana Notary?

A. Yes, I am.

Q. Notary number 29374?

A. Correct.

Q. And you furnished a bond as required by law?

A. Yes.

Q. To be a notary? Do you have any additional insurance besides the insurance bond?

A. No, I do not.

Q. Do you know Charmaine Colston?

A. I'm aware of the name. I do not have a relationship with her.

Q. On September 7, 2021, did you do notary work for Charmaine Colston?

A. On September 7th of 2021, per the back of this title, that is my signature but I would also say ... I would stipulate that and explain there were two (2) people present.

Q. So is Exhibit 1 the, uh, notary work that you did on that date, September 7th 2021?

A. This is what you're talking about?

Q. Yes ma'am. I've labeled it Exhibit 1.

A. Since there's not a front of it, I do not see the front of the title, but it is my signature, so ...

Q. I have ... I have the front. It's coming up ...

A. Well, I don't see the front so this is my signature, if that's what you're asking.

Q. Okay. I offer Exhibit number 1 Your Honor.

THE COURT:

Okay. I'm ... and I'm trying to see where everything is too. I see a Charmaine name. I see a P.O. Box. I see a Charmaine (indiscernible) maybe ... I'm ... I'm trying ... and it's just so dad-gum blurry, I'm trying to figure out what it ... what it's saying.

MS. AMOS:

Uh huh.

THE COURT:

Where is ... oh, I see Ms. Amos' signature, uh, okay, all right, I got that part down. All right. Any objection counselor to the introduction of this into evidence as Plaintiff 1?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it will be admitted as Plaintiff 1. There you go Madame Clerk.

BY MR. SCHRUMPF:

Q. And the import of Exhibit 1 is a transferred title from John King to Charmaine Colston?

A. That is what it indicates, yes.

Q. Okay. And you kept an ID for that transaction, did you not?

A. My practice is to check the IDs of all parties, the buyer and the seller.

Q. And, I've shown you exhibit 2. Is ... exhibit 2 is the ID that you had for that transaction?

A. I cannot see the ID. I see the name of Charmaine Colston, so I will make the assumption that this is in fact her ID although it's not legible.

Q. Okay. I offer Exhibit 2 Your Honor.

THE COURT:

All right, subject to our identification issues, I think we all agree that that's the ID or driver's license or something. Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it'll be entered as Plaintiff 2.

BY MR. SCHRUMPF:

Q. Those documents were obtained by the Calcasieu Parish Sheriff's Office? Did ... did they get them directly from you?

A. No ma'am, no sir.

Q. I see there was no ID attached for John King.

A. I do not have a duty to keep copies of IDs. I check the ID and validate it when they're in my office. I would not have a copy of Mr. King's ID nor Ms. Colston's ID for that matter.

Q. And John King, uh, you have no ID for him from September 7th 2021?

A. I beg ... ask that question again. I'm sorry.

Q. You do not have an ID showing that John King was present on December ...

A. ... I ...

Q. ... September 7th 2021?

A. On September 7th 2021, per my practice, I would have seen the ID of John King as the purchaser, as the seller excuse me, and Charmaine Colston as the, uh, as the purchaser, but I do not have copies of those IDs.

Q. Do you know John King?

A. I do not know him.

Q. Would you recognize John King if you saw him?

A. The first time I ... I would ... I don't ... I saw

him that one (1) time in my home. Would I have recognized him if I had not seen him in this courtroom previously, no sir I would not.

Q. It's your testimony that two (2) people showed up on September 7th 2021. One of them was Charmaine Colston. Did you identify John King?

A. My testimony is that I identify the buyer and the seller. Two (2) people showed up. I identified Ms. Colston and I identified Mr. King. I had to have identification. That identification could have been an ID, a driver's license, in some cases a passport, but both parties were properly identified before I proceeded.

Q. Ma'am, was the title ... the back of that title already signed by someone before Ms. Colston came in with it?

A. No. The title was blank on the back. My ... my policy is to look at the title. I look at the front of the title first to make sure who the sellers are. Sometimes there are more than one sellers. I then turn the title on the back. Had there been a signature on the back, I could not have proceeded.

Q. It would have been wrong to notarize it if it had already been signed, correct?

A. If it was ... if it was already signed, I would

have ... if it was signed by Charmaine Colston I would have identified her and asked her why she signed it. If it was signed by John King, I would have validated that, but there was no signature on the back of the title. In those instances, the next thing I would have done if I had some suspicion was I would have gone to the Justice of the Peace. So, I would not have proceeded if I saw anything wrong.

Q. So you have an excellent memory of what occurred on that date?

A. I do not have a memory of what occurred on that date. That's been four (4) years ago. I do have an excellent memory of my process and procedure and my process and procedure does not change.

Q. This says that the consideration was one hundred dollars ($100.00)?

A. Sometimes when people do not want to do donations, they put a small price on it. What price they tell me that they pay is the price that I put in there. I have no obligation and no ... I do not have to watch money transfer. I ask what they paid. That is not part of what I am required to do. I am required to validate identification.

Q. So you did not see the hundred dollars ($100.00) transferred?

A. I cannot remember.

Q. Was it a check?

A. I do not know sir. They could ... I have no idea how they transferred it. It's very possible they transferred money in front of me but I do so many of these, uh, often times money is transferred, yes, and I'm not involved in that. I don't count it. I don't have anything to do with that. Not my job.

Q. Ms. Amos, would you agree that if John King was in New Jersey on September 7th 2021 that he could not have been the one that signed that document?

A. I have no idea, uh, I will not agree or disagree with that. I'm going to say that someone was in my residence on that day representing themselves as John King. I looked at a driver's license, identified it.

Q. But you did not keep a copy of the driver's license of the person that said he was John King?

A. Sir, I don't keep any driver's license. The massive amount of people that I see in a day, I could not possibly keep those records. I identify them and I move on.

MR. SCHRUMPF:

I tender the witness.

THE COURT:

All right. Ma'am, I guess if you wish

to, uh, do some directing and some follow up on his cross, go ahead.

MS. DOMINIC:

At this time Your Honor, I will waive that and wait, uh, to do my ... I'm sorry, call of chief ... chief of ...

THE COURT:

Call your case in chief?

MS. DOMINIC:

... to call my case in ...

THE COURT:

I hear you. I got you, okay. All right, thank you ma'am. I ... I want to commend you. You're doing ... you ... you talk into the microphones. That is a big deal, y'all. Keep it up. It helps Madame Clerk. It's hard on the lawyers and I guess maybe we need to get body mics before it's over with 'cuz the lawyers need to move around. They don't want to use you deputy, I don't know. You can hand them to the deputies and they'll do all the transporting around that way you don't have to ... to scurry.

MR. SCHRUMPF:

Yes, okay.

THE COURT:

And deputies, feel free to step up to get the stuff. You don't have to wait for him. I get it. The Marshal likes that process. I like that process. It keeps things orderly.

MR. SCHRUMPF:

Judge, I'm want to call John King.

THE COURT:

All right. All right, Mr. King, you are on the witness stand even though you're sitting in your seat, okay?

MR. KING:

Yes sir.

* * *

JOHN CLIFFORD J KING

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on his oath as follows:

* * *

DIRECT EXAMINATION

BY MR. SCHRUMPF:

Q. Please state your name.

A. John Clifford Joseph King, Sr.

Q. And where do you reside currently?

A. I am a resident of Louisiana, but I'm currently in, uh, New Jersey due to my wife ...

THE COURT:

Louder.

A. I am currently ...

THE COURT:

There you go.

A. I am a resident of Louisiana. I am currently living in New Jersey with my wife. She is a dual resident of New Jersey and Texas. She owns her house.

Q. How long have you been living in New Jersey?

A. I initially got my contract, uh, to go to New Jersey November of 2020 and, uh, I've been working ... well, I was working there until the end of 2021 and I got hurt and I'm using her insurance to ... while I'm hurt. So I've been there since 20 ... November of 2020.

THE COURT:

Mr. Schrumpf, we got to get you to the mic because the clerk ...

MR. SCHRUMPF:

I'm sorry.

THE COURT:

The court reporter ...

MR. KING:

I'm sorry.

MR. SCHRUMPF:

We'll both have to ...

BY MR. SCHRUMPF:

Q. All right. I show you exhibit 3, what I've labeled exhibit 3. That's the front of the Certificate of Title. Is ... is this for a vehicle that you had purchased?

A. Yes.

Q. And this says it's a 2011 Chevrolet Traverse and it's got the V-I-N number and all. Shows that you, uh, received this in April of 2021?

A. Yes. That's when I, uh, I paid it off, uh, April 5th 2021.

Q. You said that's when you paid it off?

A. I paid it off. The day I paid it off was April 5th 2021.

Q. When did you first acquire the vehicle?

A. I acquired the vehicle, uh, October of 2018.

Q. And what did you use to purchase it? How'd you fund it?

A. Uh, I, uh, I was working as a welding inspector and I used my funds from my job to pay for that.

Q. Did you borrow money against the car?

A. Yes. Yes, I borrowed money.

Q. Who'd you borrow the money from?

A. Southwest Louisiana Credit Union.

Q. And in April of 2021, you paid it off?

A. Yes sir.

Q. We'll get to that document later. All right, I offer Exhibit 3.

THE COURT:

Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. And then it will be entered as defense 3. I mean, Plaintiff 3.

BY MR. SCHRUMPF:

Q. And you're currently under medical care for a back injury?

A. Yes sir.

Q. When did that back injury occur?

A. Uh, May of 2021, I want to say. May or June. I'm not sure the exact day.

Q. All right. And you learned about Charmaine Colston having your car title after you paid it off?

A. Yes sir. The, uh ...

Q. Do you recall how you found out about that?

A. Yes sir. I, uh, I initially ... I went to the court

because she had it and I ... then I couldn't find it and then I filed a police report and when I got the police report back on, uh, October 3rd is when I was able to download the police report, October 3rd of 2022, that's when I discovered who exactly had it.

Q. Did you ever intend to give the car or sell the car to Charmaine Colston?

A. No, not at the time.

Q. Did you intend to, uh, transfer it to her?

A. No sir.

Q. Did you appear on September 7, 2021 before Ms. Amos and sign the ... the transfer of that document?

A. No sir.

Q. Now on Exhibit 1, this says that Charmaine Colston and you both ... and she's testified that both of you appeared. Were you there on September 7, 2021?

A. No sir. I was in New Jersey. I ... at the time, I would ... it would have ... I would have actually been at work.

Q. Did you ever actually see the title?

A. I've never seen the title. This is the only copy I've ever seen.

Q. And this came from the Sheriff's Department?

A. Yes.

Q. After you filed a complaint?

A. Yes.

Q. Do you have evidence that you were in New Jersey on September 7, 2021?

A. Yes. I have multiple pictures, multiple videos. I have, uh, I have my work reports.

Q. All right. Hold a minute. We'll start with exhibit 4.

MR. SCHRUMPF:

One for the judge and one for each of you.

BY MR. SCHRUMPF:

Q. Okay. Can you tell us what exhibit 4 is?

A. Exhibit 4 is my Cross Fit check in. Everyday when we go to class, we get checked in.

Q. All right. You go to class?

A. It's Cross Fit.

Q. And ...

MS. DOMINIC:

And Your Honor, I'd like to ...

Q. ... at the top left of this ...

THE COURT:

Hold on a second. I believe we have an objection.

MR. SCHRMPF:

Okay.

THE COURT:

Go ahead counselor.

MS. DOMINIC:

Yes. I would like to object to it. Lack of foundation, lack of authentication. It really doesn't tell ... it just has Cross Fit on it. It doesn't say where he's at or anything Your Honor.

MR. SCHRUMPF:

So ...

MR. KING:

Okay.

MR. SCHRUMPF:

We'll get to that.

MR. KING:

Yes sir.

MR. SCHRUMPF:

Your Honor, if I may, uh, ask him some more questions about it, I think we'll clear that up.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. At the top left is a date, September 7, 2021. It says HEIC Image. Is this something you get on your phone?

A. This is actually from the, uh, this is from the

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

Suit No.: 23-2124 *Trial Date:* 5/8/2024
Time: 9:00 AM

JOHN CLIFFORD J KING — Atty: Dustan J. Abshire

VS

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 — Atty: Kamie T. Dominic

NOTES:

Rec 5/8/2024 CR2 9:47:44 /10:50

P- appears w/atty John Clifford J. King
D- appears w/atty Kamie Dominic

Hearing 5.00
Witness(es)
Documents
$5.00

Court grants plaintiff's oral motion to reset hearing and to amend pleadings to include Hartford Life Insurance Company; matter re-fixed until Thursday, November 14, 2024 @ 9:00 am; notices to be sent to all parties

BEFORE THE JUDICIARY COMMISSION OF LOUISIANA
SUMMARY OF ETHICAL VIOLATIONS

Submitted by:
Mrs Shunte King
fit4thekings@gmail.com
Date: 02/23/26

To the Honorable Members of the Judiciary Commission:

This submission summarizes serious procedural and ethical concerns arising from proceedings before Judge Ronald C. Richard involving:

Lake Charles City Court Case Nos. 23-2124 and 23-1206
14th Judicial District Court Case No. 24-5624
Calcasieu Parish Case No. 2021-2773
Impersonation Investigation Case No. 24-118583
Vehicle Investigation Case No. 2021-00123665
Third Circuit Appeal CA-25-0049
Western District of Louisiana Case No. 25-cv-1759
Essex County New Jersey Cases FV-07-000817-22 and C21039526

The concerns presented fall into the following categories:[1]

1. Exercise of jurisdiction without verified service
2. Constructive contempt without written notice or proper service
3. Identity and address irregularities in connection with contempt and warrant proceedings
4. Criminal referral under Case No. 24-5624 raising probable cause and identification concerns
5. Escalated and potentially inequitable cost imposition totaling approximately $5,000 on December 30, 2024
6. Transcript fee assessments that may have impaired appellate access
7. Post-appeal jurisdictional limitations under La. C.C.P. art. 2088
8. Overlapping involvement in matters connected to Calcasieu Parish Case No. 2021-2773
9. Request for review of communications involving Lake Charles College Prep leadership during 2021–2022

This complaint does not ask the Commission to adopt factual conclusions.

It respectfully requests that the Commission:

---

[1]

• Obtain full transcripts
• Review service returns and cost ledgers
• Review warrant affidavit in Case No. 24-5624
• Review communications between judicial staff and involved parties
• Consider interviews of relevant witnesses

The integrity of judicial proceedings requires clarity in service, notice, jurisdiction, and neutrality.

This complaint is submitted respectfully and in good faith for independent review.

Respectfully submitted,

Shunte King
fit4thekings@gmail.com

25-606

VERIFIED MOTION TO RECUSE
EMERGENCY MOTION TO STAY PROCEEDINGS
MOTION TO CONTINUE PRETRIAL AND TRIAL
AND MOTION TO CHANGE VENUE

FOURTEENTH JUDICIAL DISTRICT COURT
PARISH OF CALCASIEU, STATE OF LOUISIANA

JOHN KING SR.
Plaintiff

VERSUS

CHARMAINE COLSTON
Defendant

CASE NO. 2021-2773

VERIFIED MOTION

NOW INTO COURT, comes Plaintiff, John C. King Sr., appearing pro se, who files this Verified Consolidated Motion to Recuse the Honorable Judge Mitchell Redd and Disqualify Court Staff, Emergency Motion to Stay Proceedings, Motion to Continue Pretrial and Trial, and Motion to Change Venue, and respectfully states as follows.

This motion incorporates by reference all prior motions, objections, affidavits, and pleadings filed by Plaintiff in this matter, including filings made in September 2022, May 2023, November 23, 2024, December 2024, and February 2025, which placed the Court on notice of service defects, transcript violations, improper communications, and denial of constitutional rights.

Plaintiff verifies under oath that the facts stated herein are true and correct to the best of his knowledge and belief.

I. VERIFIED STATEMENT OF FACTS

1. Plaintiff is a lifelong Louisiana resident whose address of record has continuously been 123 North Louisiana Avenue, Lake Charles, Louisiana 70601.
2. Plaintiff has repeatedly documented that pleadings, notices, and court correspondence were sent to incorrect or fabricated addresses despite written corrections being on file with the Clerk of Court, resulting in missed deadlines and denial of notice.

3. Multiple court orders have been enforced against Plaintiff despite not being supported by a stipulated judgment transcript entered into the record, rendering such orders legally unenforceable under Louisiana law.[1]
4. Plaintiff placed the Court on notice, both in writing and on the record, that court staff engaged in communications and procedural actions affecting this case after Plaintiff's counsel withdrew and without notice to Plaintiff.
5. Plaintiff filed sworn affidavits and objections identifying improper service, transcript discrepancies, and ex parte conduct. Proceedings nevertheless continued without corrective action.
6. Opposing counsel, Orelia Lawdins Trent, threatened Plaintiff's spouse, an out of state resident, with contempt and incarceration if she did not comply with proposed depositions and discovery that were not authorized by court order, despite opposing counsel having no authority to compel or threaten across state lines.
7. Opposing counsel further contacted Plaintiff's spouse's graduate school with unfounded accusations and allegations, conduct outside the scope of lawful advocacy and unrelated to any court order.
8. Attorney Lakoshia Roberts never enrolled as counsel of record in Plaintiff's presence before the Court, yet Plaintiff was denied direct access to the Court and deprived of the right to fair counsel when the Court allowed her participation over Plaintiff's objection.
9. As a result of the cumulative conduct of the Court, its staff, and opposing counsel, Plaintiff, his spouse, his children, and extended family have suffered irreparable emotional distress, physical health impacts, and ongoing safety concerns.

II. MOTION TO RECUSE HONORABLE JUDGE MITCHELL REDD AND DISQUALIFY COURT STAFF

Louisiana Code of Civil Procedure article 151(B)(5) mandates recusal where a judge's conduct gives rise to a reasonable belief of bias or where the judge becomes personally embroiled in disputed facts.[2]

The Louisiana Supreme Court has held that even the appearance of impropriety is sufficient to require recusal where public confidence in judicial neutrality is undermined.[3]

A. Objective Appearance of Bias

The standard is whether a reasonable person, knowing all the circumstances, would harbor doubts as to the judge's ability to remain impartial. Continued oversight of proceedings marked by repeated service failures, enforcement of null orders, and disputed staff conduct meets this standard.

B. Structural Due Process Violations

Due process is violated where the tribunal is no longer neutral. When court staff act in coordination with one party or counsel, those actions are imputed to the court itself.[4]

C. Mandatory Recusal and Staff Disqualification

Because the Court and its staff are now material actors and potential witnesses to disputed facts, continued participation violates Louisiana Constitution article I, section 2 and the Fourteenth Amendment to the United States Constitution. Disqualification of chambers staff is necessary to cure the taint. Reassignment alone is insufficient.

III. EMERGENCY MOTION TO STAY ALL PROCEEDINGS

Once a motion to recuse is filed, all substantive proceedings must halt until recusal is resolved.[5]

Proceeding with pretrial conferences, discovery enforcement, or trial settings while recusal is pending creates irreparable harm and risks voidable proceedings.

Plaintiff respectfully requests an immediate stay of all hearings, discovery, deadlines, enforcement actions, and trial settings pending resolution of recusal.

IV. MOTION TO CONTINUE PRETRIAL AND TRIAL

Because a stay is mandated during the pendency of a recusal motion, any scheduled pretrial conference or trial must be continued as a matter of law.

Good cause exists to continue all settings until jurisdiction, judicial neutrality, and venue are lawfully resolved.

V. MOTION TO CHANGE VENUE

Due to cumulative due process violations, loss of a neutral tribunal, and involvement of court staff as disputed actors, venue in the Fourteenth Judicial District Court is no longer constitutionally viable.

Transfer to a neutral judicial district is required to preserve Plaintiff’s right to an impartial tribunal and public confidence in judicial proceedings.

VI. TIMELINE OF DUE PROCESS AND CIVIL RIGHTS VIOLATIONS

September 2022
Plaintiff filed objections and motions citing lack of service and improper filings.

May 2023
Plaintiff objected to unapproved counsel participation and denial of access to the Court.

November 23, 2024
Plaintiff filed sworn affidavits documenting service manipulation and transcript issues.

December 2024
Plaintiff filed emergency pleadings citing continued improper service and staff conduct.

February 2025
Plaintiff filed motions placing the Court on notice of federal due process violations and civil rights deprivations.

VII. PRESERVATION OF FEDERAL RIGHTS

Plaintiff expressly preserves all claims under 42 U.S.C. sections 1983 and 1985. No waiver of federal remedies is intended by participation in state proceedings.[6]

VIII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Honorable Court:

Order immediate recusal of Honorable Judge Mitchell Redd
Disqualify all chambers staff involved in this matter
Stay all proceedings pending reassignment
Continue all pretrial and trial settings
Transfer venue to a neutral judicial district
Grant all further relief deemed just and proper

FOOTNOTES

1. ***Dolsen v. City of New Orleans, 157 La. 486, 102 So. 583 (1925).***
2. ***La. Code Civ. Proc. art. 151(B)(5).***
3. ***State v. Connolly, 2006-0540 (La. 6/2/06).***
4. ***In re Murchison, 349 U.S. 133 (1955).***
5. ***State v. Price, 274 So.2d 194 (La. 1973).***
6. ***U.S. Const. amend. XIV; 42 U.S.C. sections 1983 and 1985.***

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served this date by electronic mail upon counsel of record for Defendant, Orelia Lawdins Trent, and copied to the Clerk of Court, Fourteenth Judicial District Court.

DATED this ___ day of _____ 2026.

John C. King Sr.
Pro Se
123 North Louisiana Avenue
Lake Charles, Louisiana 70601
truekingfile@gmail.com

ORDER

IT IS ORDERED that the Motion to Recuse is ☐ GRANTED ☐ DENIED.
IT IS FURTHER ORDERED that all proceedings are ☐ STAYED.
IT IS FURTHER ORDERED that pretrial and trial are ☐ CONTINUED.
IT IS FURTHER ORDERED that venue is ☐ TRANSFERRED ☐ DENIED.

SIGNED this ___ day of _____ 2026.

JUDGE PRESIDING

_____

COVER LETTER TO CLERK

John C. King Sr.
123 North Louisiana Avenue
Lake Charles, Louisiana 70601
truekingfile@gmail.com

Date: _____ 2026

Clerk of Court
Fourteenth Judicial District Court
Calcasieu Parish
Lake Charles, Louisiana

Re: King v. Colston, Case No. 2021-2773
Filing of Consolidated Verified Motion

Dear Clerk,

Please file the enclosed Consolidated Verified Motion to Recuse, Emergency Motion to Stay Proceedings, Motion to Continue Pretrial and Trial, and Motion to Change Venue in the above referenced matter.

This filing includes proposed orders and a certificate of service. The motion is submitted for immediate docketing and consideration.

Please confirm filing and provide stamped copies for my records.

Thank you for your attention.

Respectfully,

John C. King Sr.
Pro Se

_____

COURT OF APPEAL

THIRD CIRCUIT

STATE OF LOUISIANA

NO. _____

JOHN CLIFFORD J. KING
Plaintiff/applicant
VERSUS
RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY
Defendants-respondents

APPLICATION FOR WRIT OF REVIEW TO THE
THIRD CIRCUIT COURT OF APPEAL
NO. _____

FROM THE WARD 3 / LAKE CHARLES CITY COURT
PARISH OF CALCASIEU, STATE OF LOUISIANA
NO. 23-2124
HONORABLE RON RICHARD, PRESIDING

ORIGINAL APPLICATION AND BRIEF OF PLAINTIFF-APPLICANT, JOHN CLIFFORD J. KING, FOR WRIT OF REVIEW TO THE LAKE CHARLES CITY COURT And REQUEST FOR EXPEDITED CONSIDERATION And STAY

A CIVIL CASE

Respectfully submitted:

Oliver "Jackson" Schrumpf
Attorney for Applicant
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
Appeal Counsel
Bar Roll No. 11832

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I. APPLICATION FOR WRIT OF CERTIORARI

The application of JOHN CLIFFORD J. KING, plaintiff, and Oliver Schrumpf, Attorney, respectfully represents:

A. Applicant is aggrieved by the orders of the Honorable Ronald Richard, Ward 3 / Lake Charles City Court Judge on December 30, 2024 and applicant is entitled to have this honorable court grant a supervisory writ to review and reverse those orders.

B. A statement of the considerations required by Rule 4-5 C. of the Uniform Rules of Courts of Appeal, a memorandum setting forth the statement of the case, an assignment of errors, a summary of the argument, and an argument addressing the assignments of error on the facts and law; a verification of the application, and appendix containing the requisite exhibits, are all annexed here and made a part of this application.

A request for expedited consideration and stay of proceedings pending decision is attached.

Wherefore, applicant prays that after due consideration, in the discretion of this honorable court, that a supervisory writ be granted, and that thereafter the orders of the Ward 3/ Lake Charles City Court aggrieving applicant be reversed:

A. Reinstating the pauper status of John Clifford J. King, Plaintiff; and

B. Staying further hearings pending the devolutive appeal.

OLIVER "JACKSON" SCHRUMPF
Attorney for applicant

Sworn to and subscribed before me this 23rd day of January, 2025.

Notary Public Jinnifer L. LeBlanc
Notary No. 55493

REQUEST FOR EXPEDITED CONSIDERATION AND STAY OF PROCEEDINGS

The Trial Court has granted a stay suspending the Court's Order for counsel to appear on January 15, 2025 to represent John King and/or Shunte King in matters set by the Court for hearing (contempt and hearings on the motions filed by King In Proper Person), but counsel prays that this Court of Appeal grant expedited consideration of this application and stay all trial court proceedings pending decision on this application and eventually the devolutive appeal.

The trial Court's sua sponte retroactive rescission of its pauper order in this case will prevent the pauper plaintiff, John King, from pursuing a devolutive appeal unless this application is granted and the trial court order is reversed.

Additionally, the trial court is attempting to exert its control over the plaintiff (and plaintiff's spouse) who reside in New Jersey, by ordering local counsel to appear at hearings for which Counsel does not represent the plaintiff and for which counsel will not be compensated.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

II. STATEMENT OF THE CONSIDERATIONS WARRANTING THE GRANTING OF WRITS

A. **Orders issued after jurisdiction divested.**

A judgment was rendered on November 14, 2024, after trial on the merits. The judgment denying all of plaintiff's requested relief was signed on November 21, 2024.

An order of appeal was entered on December 3, 2024 granting a Devolutive appeal from the Judgment dated November 21, 2024. In accordance with La. C.C.P. 2088, jurisdiction is "divested" except for certain limited exceptions (none pertinent here). On December 30, 2024, the Court issued orders not allowed under La. C.C.P. 2088.

(1) Retroactively rescinding the Order granting plaintiff Pauper status, and

(2) Ordering Oliver Schrumpf to represent the plaintiff in contempt proceedings for pleadings and communications made by plaintiffs with court personnel before and after the appeal was entered.

B. **Interference with Attorney-Client contract.**

Despite the jurisdiction of the Court being divested, the Trial Court ordered counsel for John King in the primary case (King vs Amos and Hartford) to appear on December 30, 2024 without any advance notice of what issues were to be heard; and then on December 30, 2024 ordered counsel to appear again on January 15, 2025, [Apparently, post trial, John King filed pleadings In Proper Person after the trial court jurisdiction was divested and the Court wants to hold King in Contempt for the allegations

being made by King or the Court wants counsel to represent King in the claims King made In Proper Person. [The trial Court should have merely declined to take any action since its jurisdiction is divested.] Counsel only represents John King on the claim against the Notary and her bonding company for executing a bill of sale when John King was in New Jersey or New York and not present in Lake Charles, La. Counsel has advised King to retain separate counsel for any contempt proceedings. But since King continues to reside in New Jersey, the Court is attempting to gain control over King through counsel in the core case. Counsel has less control over the actions of John King than the Court does.

C. **Sua Sponte Rescission of In Forma Pauperis order.**

Not only was jurisdiction of the Trial Court divested by the appeal order, but the Trial Court then, without notice or contradictory hearing, announced that the Court was Sua Sponte Rescinding the previous order granting pauper status. The Court claimed grounds as Mr. King's spouse is not a "third party" suitable to sign the affidavit of poverty. {But see La. C.C.P. 5183, prohibiting only the party's **attorney** from signing as the third party.} The Trial Court also made reference to some out of court communication by King about attorney fees, but without advance notice, no opportunity for meaningful response was granted to plaintiff. The effect of rescinding pauper status is to require plaintiff to pay thousands of dollars in Court fees immediately in order to have the Trial Court's decision reviewed by the Court of Appeal, effectively denying plaintiff an appeal. Additionally, the Court is ordering counsel to represent King in matters that

counsel has not been retained to represent King in. This is taking time and effort of counsel without compensation.

C. Why expedited granting of writs is appropriate in this case.

Plaintiff fully intends to pursue the devolutive appeal on the merits of this case and believes that upon review, the Trial Court decision will be reversed. However, the actions of the trial court, taken after jurisdiction was divested, effectively deny plaintiff a right of appeal.

CONCLUSION:

The decisions of the Trial Court made on December 30, 2024 should be reversed:

A. John King's Pauper Status should be maintained.

B. Oliver Schrumpf should be relieved of the Order that he represent John King in contempt proceedings, or in issues filed In Proper Person by King after jurisdiction divested.

C. Further proceedings in the trial court should be stayed while the matter is heard by the Court of Appeal.

III. MEMORANDUM OF LAW

A. Statement of the Case and Prior Proceeding

FACTS:

John Clifford J. King contacted Oliver Schrumpf on October 31, 2024 requesting Schrumpf represent him in a case against a Louisiana Notary (Rene Amos) who had notarized a vehicle transfer of King's vehicle on September 7, 2021 at a time when the owner of the vehicle (John King) was out of the state of Louisiana (in New Jersey or New York). King e-mailed a

copy of the petition and a copy of the investigation report from the Calcasieu Parish Sheriff's office to Schrumpf. On November 6, 2024, Schrumpf agreed to represent King in the matter against the Notary. On November 7, 2024 Schrumpf filed a Motion to Enroll and a Motion to Continue the case (then set for trial on November 14, 2024). The trial court ordered Schrumpf to appear for a hearing that day (November 7, 2024) before authorizing the enrollment. Judge Ron Richard advised Schrumpf that John King had been filing ex parte communications with the Court making allegations that the Court did not appreciate and that the case had been set for trial several times. The Court granted the enrollment but denied the Motion to Continue and confirmed that trial would occur on November 14, 2024. The Court also denied a request for plaintiff to appear via Zoom unless he could provide to the court an excuse signed by a physician by Monday, November 11, 2024 (a judicial holiday). Schrumpf advised his client that he must obtain a signed excuse from a doctor and have it to the Court by Monday, November 11, 2024 or make arrangements to be present for trial on November 14, 2024. The Court and Schrumpf's office were closed November 11, 2024 (Veteran's Day). King e-mailed a document signed by a doctor to the court on November 11, 2024, but, despite a back condition, managed to fly from New Jersey to Lake Charles to be present for the trial. The trial court found that Mr. King in deed was not in Lake Charles on the date the notary claimed she notarized his signature, but the court ruled against Mr. King on November 14, 2024, and signed a judgment denying his claim on November 21, 2024. The result of the trial is the

subject of a devolutive appeal granted December 3, 2024. However, this present Writ Application involves the Court's order for Schrumpf to appear for a hearing on December 30, 2024 after jurisdiction of the trial court had divested, and the Court's Sua Sponte rescission on December 30, 2024 of the Pauper Order previously entered in the case.

IV. ACTIONS BELOW:

A. On December 30, 2024, the Trial Court SUA SPONTE and without prior notice, rescinded its prior order granting pauper status to John King. This in effect denies King's right to appeal the decision on the merits of the case unless he can find several thousand dollars to pay costs within 20 days.

B. On December 30, 2024, the Trial Court Ordered Oliver Schrumpf to represent John King in contempt proceedings for filing of ex parte pleadings with the Lake Charles City Court on December 12, 2024 or at trial of the issues raised by those pleadings. The pleadings were filed by John King via e-mail. Even though King copied the pleadings to Schrumpf, Schrumpf neither assisted, counseled, or even knew that the pleadings were being prepared or filed by King. Schrumpf did not contract to represent King on contempt charges or on the clams raised in those pleadings, and after the claims were brought to Schrumpf's attention by the Court, Schrumpf advised King he should contact an attorney with criminal law expertise to represent him on the contempt counts.

Schrumpf does not hold himself out as current in practicing criminal law.

V. SPECIFICATIONS OF ERROR AND ISSUES FOR REVIEW

A. The Trial Court erred in taking action after trial court jurisdiction divested to retroactively rescind the Pauper status of John King, thereby depriving the pauper plaintiff of a right of devolutive appeal.

B. The Trial Court erred in ordering attorney Oliver Schrumpf to defend John King on charges for contempt of court or to try allegations raised in pleadings filed by John King In Proper Person which were done without knowledge, assistance, or counsel of attorney Schrumpf.

VI. SUMMARY OF ARGUMENT

A. **Pauper Status**: Jurisdiction of the trial court divested on December 3, 2024 with the granting of the devolutive appeal [See Order Granting Appeal, Appendix C and La. C.C.P. 2088]. Thereafter the trial court did not have jurisdiction to order counsel to a hearing on December 30, 2024 or to SUA SPONTE retroactively rescind the order granting pauper status to John King. {See transcript December 30, 2024, p. 21} Furthermore, the Court's reasoning for rescinding the Pauper Order was erroneous: Mrs. King is not a "third party disallowed from signing as an affiant". See La. C.C.P. 5183 A. (2). Additionally, the Court may only reconsider its original order granting the application "in a contradictory hearing" [La. C.C.P. 5183 B.

(3)]. This process would require notice and an opportunity to prepare for the hearing, which did not occur on December 30, 2024.

B. **Ordering Counsel to represent Mr. King in a Contempt Proceeding.** When John King sent an e-mail to the Lake Charles City Court on December 12, 2024 (and copied the e-mail to Oliver Schrumpf), the Court was upset with Mr. King's conduct and wanted to punish him, but the Court did not have jurisdiction to entertain Mr. King's pleadings. The proper action of the Court would have been to decline to take any action on the pleadings until jurisdiction is returned to the trial court. Instead, the Court ordered Oliver Schrumpf to appear on December 30, 2024 and on that date, the Court Ordered Oliver Schrumpf to appear January 15, 2025 to defend John King on contempt charges and/or to represent Mr. King on the matters in his December 12, 2024 In Proper Person pleadings. Oliver Schrumpf did not counsel Mr. King to file the December 12, 2024 pleadings, did not prepare the pleadings, did not sign the pleadings, and did not know that Mr. King had in mind to file the pleadings. More importantly, Oliver Schrumpf did not contract to represent Mr. King on any of the claims made in his December 12, 2024 filing. The Court Ordering Oliver Schrumpf to pursue claims on behalf of John King that Schrumpf did not contract to perform exceeds the authority of the Court. When jurisdiction is returned to the trial court, the Court may set a hearing and notify John King of the hearing date and if Mr. King appears in person or hires an attorney to represent him, the Court may then make rulings on Mr. Kings' pleadings as appropriate.

Oliver Schrumpf should not be commanded to use his time and effort to pursue matters he did not undertake in his agreement with Mr. King.

VII. ARGUMENT AND LAW

A. THE TRIAL COURT'S JURISDICTION OVER THE CASE DIVESTED WHEN THE ORDER OF DEVOLUTIVE APPEAL WAS GRANTED ON DECEMBER 3, 2024.

See Order granting Devolutive Appeal. Appendix C.

La. C.C.P 2088 provides:

> Art. 2088. Divesting of jurisdiction of trial court
>
> A. The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal and the timely filing of the appeal bond, in the case of a suspensive appeal or on the granting of the order of appeal, in the case of a devolutive appeal. Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following:
>
> (1) Allow the taking of a deposition, as provided in Article 1433.
>
> (2) Extend the return day of the appeal, as provided in Article 2125.
>
> (3) Make, or permit the making of, a written narrative of the facts of the case, as provided in Article 2131.
>
> (4) Correct any misstatement, irregularity, informality, or omission of the trial record, as provided in Article 2132.
>
> (5) Test the solvency of the surety on the appeal bond as of the date of its filing or subsequently, consider objections to the form, substance, and sufficiency of the appeal bond, and permit the curing thereof, as provided in Articles 5123, 5124, and 5126.
>
> (6) Grant an appeal to another party.
>
> (7) Execute or give effect to the judgment when its execution or effect is not suspended by the appeal.
>
> (8) Enter orders permitting the deposit of sums of money within the meaning of Article 4658.
>
> (9) Impose the penalties provided by Article 2126, or dismiss the appeal, when the appellant fails to timely pay the estimated costs or the difference between the estimated costs and the actual costs of the appeal.

(10) Set and tax costs, expert witness fees, and attorney fees.

(11) Certify a partial judgment or partial summary judgment in accordance with Article 1915(B).

(12) Amend a judgment to provide proper decretal language under Article 1918 or 1951.

B. In the case of a suspensive appeal, when the appeal bond is not timely filed and the suspensive appeal is thereby not perfected, the trial court maintains jurisdiction to convert the suspensive appeal to a devolutive appeal, except in an eviction case.

Amended by Acts 1964, No. 4, §1. Acts 1968, No. 128, §1. Acts 1977, No. 175, §1, eff. Jan. 1, 1978. Acts 1983, No. 126, §1; Acts 2008, No. 658, §1; Acts 2021, No. 259, §2.

Accordingly, the Trial Court had no authority to Sua Sponte rescind the In Forma Pauperis Order previously granted in the case, nor to Order Oliver Schrumpf to appear at hearings or to defend John King on contempt charges or pursue Mr. King's In Proper Person filings which occurred after the Court's jurisdiction had divested. The trial court should have simply declined to take any action on the In Proper Person pleadings filed by Mr. King after jurisdiction divested.

Alternatively, even if this Court finds that the trial court retained jurisdiction to reconsider the granting of the application for pauper status, the Court's ruling should be reversed because: the grounds stated are contrary to law: [Transcript of December 30, 2024 p. 21 the Court found that Mrs. King was "not a third party" as required by La. C.C.P. 5083]. In fact, La. C.C.P. 5083 A. (2) specifically states: "the affidavit of a third person other than the applicant's attorney...". Therefore, a spouse qualifies to sign the affidavit of poverty unless she is also "the applicant's attorney".

Finally, even if the Court of Appeal does not find fault with any of the foregoing, the statute allows the court to reconsider its original order

"on its own motion at any time **in a contradictory hearing**." {La. C.C.P. 5083 B. (3). A contradictory hearing would provide notice and an opportunity to be heard which did not occur on December 30, 2024. Had there been notice of the issues to be considered (including reconsideration of pauper status), counsel may have been able to offer evidence to contradict the Court's claims. For instance, Mr. King did not have $12,000 to pay attorneys. But Mr. King may have received grants from civic organizations to help him pay attorneys because of the wrongs which had been done to him when his vehicle was stolen and a Louisiana Notary purportedly notarized his signature on September 7, 2021 at a time when Mr. King was in New Jersey or New York.

CONCLUSION

This application for supervisory writs should be granted to reverse the orders of the trial court on December 30, 2024: A. Retroactively rescinding the Pauper Status Order previously granted to John King; and B. Ordering Oliver Schrumpf to appear and represent John King on contempt or other matters raised in In Proper Person pleadings filed by John King after the Court's Jurisdiction had been divested.

Respectfully submitted by Attorney for Applicant, JOHN CLIFFORD J. KING and his attorney, Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF, Appeal Counsel
Bar Roll No. 11832
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077

VERIFICATION

I certify that the allegations in the foregoing application for writ of certiorari are true and correct, to the best of my knowledge, information, and belief, and that a copy of this application has been delivered to the Trial Judge, Ron Richard, via e-mail ron@lccitycourt.org

and to the below listed counsel for defendant:

Ed Bauman via e-mail ed@lakecharlesattorney.com

Oliver Schrumpf

Date OLIVER "JACKSON" SCHRUMPF

Sworn to and subscribed before me this 23rd day of January, 2025.

Jinnifer L. LeBlanc

Jinnifer L. LeBlanc
Notary No. 55493

Notary

CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing Application for Writ of Review and for Stay has been served on the presiding trial judge and all opposing counsel, by depositing a copy in the U.S. Mail, postage prepaid, properly addressed to all counsel, and to the Third Circuit Court of Appeal, to wit:

Third Circuit Court of Appeal — by Hand Delivery
Judges
P.O. Box 16577
Lake Charles, Louisiana 70616

Ed Bauman
Counsel for Defendants,
Amos and Hartford — Via e-mail: ed@lakecharlesattorney.com
Lake Charles, La. 70602-3010

Judge RON RICHARD — ron@lccitycourt.org
Judge, Ward 3/Lake Charles City Court

Thus done at Sulphur, La. This 24 day of January, 2025.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

APPENDIX

TAB #		Page(s)
A.	Final Judgement November 21,2024	19-20
B.	Motion for Devolutive Appeal	21
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D.	Copy of order granting Pauper status August 13, 2024	24-27
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MinuteID: 1869063

STATE OF LOUISIANA, PARISH OF CALCASIEU

CITY COURT OF LAKE CHARLES

NOTICE OF JUDGMENT

JOHN CLIFFORD J KING

Vs. No. **23-2124**

RENEE AMOS NOTARY PUBLIC NOTARY ID# 2937

TO: John Clifford J King
Thru: Attorney Oliver Jackson Schrumpf
3801 Maplewood Drive
SULPHUR, Louisiana
of said Parish Calcasieu

You are hereby notified that a:

JUDGMENT

has been filed on **11/19/2024** and signed by Judge **Judge Richard** on **11/21/2024** in the above numbered and entitled cause as per certified copy attached heret

Witness the HONORABLE JAMIE B. BICE RONALD C. RICHARD, Judges of said Court,

this **21** day of **November**, **2024**

Deputy Clerk of Court

TRUE COPY

23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that Notice of Judgment was mailed to the plaintiff, John Clifford J King through attorney Oliver Jackson Schrumpf and to defendant, Renee Amos through attorney Kamie T. Dominic this 21st day of November 2024.

CLERK

Ronald C. Richard

A TRUE COPY
Date: 11-21-2024
CLERK

REC'D LC CITY COURT CIV
'24 NOV 19 AM8:39

JOHN CLIFFORD J KING : LAKE CHARLES CITY COURT

VS . NO. 23-2124 : PARISH OF CALCASIEU

RENEE AMOS : STATE OF LOUISIANA
NOTARY PUBLIC
NOTARY ID #29374

FILED: 11-19-2024 : _____
~~DEPUTY~~ CLERK OF COURT

JUDGMENT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, and his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing this matter and for reasons orally assigned, entered the following judgment:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT READ and SIGNED this 21st day of November, 2024, in Lake Charles, Calcasieu Parish, Louisiana.

RON RICHARD, JUDGE DIVISION B
JUDGE, LAKE CHARLES CITY COURT

Ronald C. Richard

A TRUE COPY
11-21-2024
Clerk

RECD LC CITY COURT CIV
'24 DEC 2 AM11:38

JOHN CLIFFORD J KING	:	WARD 3/LAKE CHARLES CITY COURT
VERSUS NO. 2023-2124	:	PARISH OF CALCASIEU
RENEE AMOS NOTARY PUBLIC ID #29374	:	STATE OF LOUISIANA
FILED: 12-2-2024	:	~~DEPUTY~~ CLERK OF COURT

MOTION AND ORDER FOR DEVOLUTIVE APPEAL

ON MOTION OF Oliver "Jackson" Schrumpf, counsel for John Clifford J King, plaintiff herein, for a devolutive appeal from the judgment rendered November 14, 2024, read and signed November 21, 2024, notice of which was mailed November 21, 2024, and from the judgment ("Ruling") denying plaintiff's claims against Renee Amos.

IT IS ORDERED that a devolutive appeal be and is hereby granted to John Clifford J King and that the appeal be returnable to the Court of Appeal, Third Circuit, State of Louisiana, at Lake Charles, Louisiana, upon payment of costs in accordance with law.

SO ORDERED this 3rd day of December, 2024, in Lake Charles, Calcasieu Parish, Louisiana.

JUDGE ~~RON~~ RICHARD

Ronald C. Richard

Prepared by:

BY: Oliver Schrumpf
OLIVER "JACKSON" SCHRUMPF #11832
SCHRUMPF LAW OFFICE,
A Professional Law Corporation
3801 Maplewood Drive
Sulphur, Louisiana 70663
(337) 625-9077; Fax (337) 625-8231
oschrumpf@schrumpf-law.com

12-3-2024

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS. NO. 23-2124		PARISH OF CALCASIEU
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374	:	STATE OF LOUISIANA
FILED: 12/5/2024	:	DEPUTY CLERK

ORDER

Considering the petition for devolutive appeal wherein JOHN CLIFFORD J KING was granted a devolutive appeal from the judgment rendered in the above entitled and numbered cause, returnable in the Court of Appeal, Third Circuit, State of Louisiana, on the 16th day of January, 2025.

Lake Charles, Louisiana, this 5th day of December, 2025.

RONALD C. RICHARD
CITY JUDGE, DIVISION B

Suit No. 23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a certified copy of the Motion and Order for Devolutive Appeal signed by Judge Ronald C. Richard has this 3rd day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

CLERK

LAKE CHARLES CITY COURT
WARD THREE
CALCASIEU PARISH
STATE OF LOUISIANA

John C. J. King Sr. :
Vs. No. 23-2124 :
Renee Amos :
7-30-2024 :
FILED

DEPUTY CLERK OF COURT

In Forma Pauperis AFFIDAVIT

All questions must be answered in full.
Clients of Federally Chartered Legal Services Corporations only answer questions 1-8 and 11-13.

1. **Full Name** John C. J. King Sr
   Social Security No. 1934 **Date of Birth** 04-17-1986 **Sex** M

2. **Address** 123 N. Louisiana Ave. Lake Charles,LA
   (Box No. or Street Address) (City) (State and Zip Code)

3. **Telephone No(s).** 318-995-1705
   (Home) (Work)

4. **Are you a student?** yes **If so, please indicate the name of the school you are attending:** Essex Vocational and Technical

5. **What is your occupation?** Temoirary Disabled Unemployment **Are you employed?**
6. Injured
   Name of your employer None **Employer's Address** N/A **Telephone No.**
   How long have you been so employed?
   If unemployed, list the name of your last employer FTC
   If unemployed, how long have you been unemployed 6 Months

6. **Income: Weekly Wages** $0 **Monthly Wages** $0
   Monthly deductions: Federal Income Tax 14944 **FICA**
   Other deductions
   Any other income
   Is your income less than or equal to 125% of the federal poverty level? yes

7. **Marital Status:**
   Single ___ **Married** ✓ **Separated** ___ **Divorced** ___ **Widowed** ___ **Concubine** ___
   How many children do you support who are under 18? 3
   How many children live with you? 3
   Do you have any other dependents? 0 **State names, ages, and relationship:**

19

ELECTRONIC
FILE DATE: 7-30-2024

Jayla King;15;daughter / John King Jr;14;son / Jakai King,5;son

Is your spouse employed? No **If so, please indicate the name of your spouse's employer** Graduate Student
Spouse's employer's address N/A
Telephone No. 318-995-1705 **Wages: Weekly$**_____ **Monthly $**_____

8. **Do you or your spouse receive any of the following income or support?**_____
   If so, please state the monthly amount:
   SSI 0
   TANF 0
   Child support 0
   Disability 0
   Workers comp 0
   Rent Supplement 0
   Unemployment benefits 0
   Food stamps 0

9. **Do you own or have an interest in any of the following? (Including community property)**

House 0	**Value $** 0	**Balance owed $** 0			
Auto 0	**Value $** 0	**Balance owed $** 0			
Truck 0	**Value $** 0	**Balance owed $** 0			
Watercraft 0	**Value $** 0	**Balance owed $** 0			
Livestock 0	**Value $** 0	**Balance owed $** 0			
Machinery 0	**Value $** 0	**Balance owed $** 0			
Stock 0	**Value $** 0	**Bonds** 0	**Value $** 0		
Certificates of Deposit 0	**Value $** 0				
Other immovable property 0	**Equity $** 0	**Debt $** 0			
Bank account 0	**Value $** 0				

Name and location of bank:
Capital One

10. **Please list your monthly expenses:**

Rent 1600 Student	**Lot rent**	**House note**	**Gas**
Electric 200	**Water**	**Telephone** 90	**Cable**
Garbage	**Property taxes**	**House ins.**	**Med. ins.**
Medical expenses	**Dental expenses**	**Prescriptions**	
Life ins. 120 Monthly	**Car note**	**Car ins.**	**Transportation**
Food	**Barber/beauty**	**Entertainment**	**Child support**
Daycare	**Cleaning supplies/toiletries**	**Other**	

Support for children other than those of this marriage **Garnishment**

Credit cards (List type of card and monthly payment)

Discover	$ 15500	200	$
Mastercard	$ 4000	150	$
Visa	$ 2000	220	$
Visa	$ 1800	140	$

Loans (List the financial institution and the amount you pay monthly)

	$		$
	$		$
	$		$
	$		$

TOTAL MONTHLY EXPENSES $ 2820

11. **Does anyone regularly help you pay your expenses?** no **If so, please state that person's name and relationship to you** N/A

Do you have any additional income or assets that are not shown above?_____
If so, please explain N/A

12. **What arrangements have you made to pay your attorney's fee and what amount, if any have you paid? (You are required to answer fully.)**
Pro-Se

13. **Has your attorney explained to you that it is a crime punishable by imprisonment to intentionally give a false answer to any of the above questions?** yes

State of Louisiana, Parish of Calcasieu

BEFORE ME, personally came and appeared John C J. King SR
who after being duly sworn, deposed and said that:

(S)he is a citizen of the United States of America and is presently domiciled in and a resident of Louisiana.

(S)he is the person who furnished the information above; that (s)he has signed the petition; that the information is furnished to the court for the purpose of requesting permission to litigate the above captioned lawsuit without paying the costs in advance or as they accrue or furnishing security therefor.

That the foregoing petition and that all allegations of fact therein contained are true and correct; and that because of his/her poverty and want of means, (s)he is unable to pay the costs of court in advance or as they accrue, nor is (s)he able to provide bond therefor.

Applicant's Signature

NOTICE

Although you may be granted the privilege of proceeding without prepayment of costs, should judgment be rendered against you, YOUR STATUS AS A PAUPER DOES NOT RELIEVE YOU OF THE ORLIGATION TO PAY THESE COSTS.

The privilege to proceed *In Forma Pauperis* is restricted to litigants who are clearly entitled to do so, with due regard to the nature of the proceeding, the court costs which otherwise would have to be paid, and the ability of the litigant to pay them ro to furnish security therefor, so that the indiscriminate filing of lawsuits may be discouraged, without depriving a litigant of the benefit of proceeding *In Forma Pauperis* if (s)he is entitled to do so.

SWORN TO AND SUBSCRIBED BEFORE ME, a Notary Public in Hudson County
~~**Louisiana;**~~ **this** 30th **day of** July, **20** 24.
New Jersey

Notary Public

JAKE G MULRENAN
Notary Public, State of New Jersey
Comm. # 50215247
My Commission Expires 10/16/2028

THIRD PARTY AFFIDAVIT

BEFORE ME, personally came and appeared Shirley Jones King
who after being sworn, deposed and said that (s)he knows John C J King
well and that (s)he knows that because of his/her poverty and want of means, (s)he is unable to pay the costs of court in advance or as they accrue, nor is (s)he able to provide bond therefor.

Affiant

SWORN TO AND SUBSCRIBED BEFORE ME, a Notary Public in Hudson County, ~~Louisiana~~, **this** 30th **day of** July, **20** 24. New Jersey

Notary Public

JAKE G MULRENAN
Notary Public; State of New Jersey
Comm. # 50215247
My Commission Expires 10/16/2028

LEGAL SERVICES DECLARATION

BEFORE ME, personally came and appeared _____ **who is a duly authorized representative of Acadiana Legal Services Corporation or Southwest Louisiana Legal Services, or a pro bono program receiving referrals from one of the aforementioned organizations, states that** _____ **has produced evidence that (s)he receives public assistance benefits, or that (s)he has qualified to receive free legal services based on his/her income being less than or equal to 125% of the federal poverty level and therefore is entitled to a rebuttable presumption that (s)he is entitled to the privilege of litigating without prior payment of costs.**

_____
Legal Services Representative

ORDER

Considering the foregoing petition and affidavits:

IT IS HEREBY ORDERED that _____ **be permitted to prosecute or defend this litigation in accordance with Louisiana Code of Civil Procedure Article 5181, without paying the costs in advance or as they accrue or furnishing security therefor.**

Signed this chambers 13th **day of** Aug **20** 24 **in Lake Charles, Louisiana.**

~~JUDGE, 14th JUDICIAL DISTRICT COURT~~

Ronald C. Richard

A TRUE COPY
Date: 1-10-2025
Clerk

FAX COVER SHEET

TO	Attn Clerk of Court
COMPANY	
FAX NUMBER	13374911303
FROM	John King
DATE	2024-05-20 20:56:37 GMT
RE	King vs Amos 23-2124

COVER MESSAGE

Pauper Affidavit

Fax file fee already paid!

REC'D LC CITY COURT CIV
'24 DEC 19 PM2:29

IN RE: JOHN CLIFFORD J. KING

Lake Charles City Court

Calcasieu Parish, Louisiana

Filed 12-19-2024

~~Deputy~~ Clerk of Court

MOTION TO BE EXCUSED FROM HEARING

Now comes Oliver "Jackson" Schrumpf, attorney, individually, who respectfully shows:

1. On November 7, 2024, Movant enrolled as attorney for John King in the matter entitled John King vs. Rene Amos, No. 2023-2124, Lake Charles City Court.
2. The King vs. Amos matter was tried on November 14, 2024.
3. Judgment was signed in that matter on November 21, 2024 and Notice of Judgment was mailed by the Clerk on the same day.
4. An order granting a devolutive appeal of that judgment was granted on December 5, 2024.
5. In accordance with La. C.C.P. Art. 2088. Divesting of jurisdiction of trial court:

   A. **The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, ... on the granting of the order of appeal, in the case of a devolutive appeal.** Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following: (none applicable in this case).
6. John King has subsequently filed other pleadings in Lake Charles City Court and John King, and his wife, have been cited to appear in other matters not involving the Judgment subject to appeal. (Even if the wording of the pleadings filed by King was vague or ambiguous, or even if it intended to refer to the judgment in 2023-2124, regardless, the Court would not have jurisdiction to take any action on that particular matter because the jurisdiction of the Court is "divested").
7. Oliver "Jackson Schrumpf does not represent the John King or Shunte King in the contempt matters or any other matters other than the devolutive appeal in King vs. Rene Amos, No. 2023-2124.

8. On December 18, 2024, after e-mail exchanges by the Judge's paralegal and Oliver Schrumpf, the Court, Judge Ron Richard, called Oliver Schrumpf and, by telephone, ordered Schrumpf to appear at a hearing on December 30, 2024 at 9:00 AM. Schrumpf protested that he does not represent the Kings on the newly filed pleadings or on the contempt matters. Judge Richard, nevertheless said that the King pleadings sought recusal of the judge as to all judgments, which Judge Richard believes means even the judgment described in paragraph 3 above.

9. As attorney for John King in the King vs. Rene Amos, No. 2023-2124, Oliver Schrumpf here shows that the trial court's jurisdiction over that judgment has been divested and no action can be taken as to that judgment by the trial court.

Accordingly, Oliver Schrumpf requests the Court rescind its order for Oliver Schrumpf to appear on December 30, 2024 and excuse Oliver Schrumpf from appearing, reserving to John King the right to retain other counsel to represent him in that matter.

Respectfully Submitted By

SCHRUMPF LAW OFFICE,
A PROFESSIONAL LAW CORPORATION

BY: Oliver Schrumpf
OLIVER "JACKSON" SCHRUMPF
LA Bar Roll No. 11832
3801 Maplewood Drive
Sulphur, LA 70663
Tel - 337/625-9077
Fax-337-625-8231
oschrumpf@schrumpf-law.com

ORDER

Considering the foregoing Motion, let OLIVER "JACKSON" SCHRUMPF be excused from appearing at the hearing currently fixed for December 30, 2024 at 9:00 AM.

SIGNED in Chambers in Lake Charles, Louisiana, on this 26 day of December, 2024.

RON RICHARD, CITY JUDGE

Suit No. 23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a copy of the Motion To Be Excused From Hearing DENIED by Judge Ronald C. Richard has this 27 day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

CLERK

MINUTES OF THE COURT

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

DECEMBER 30, 2024

JUDGE RONALD C. RICHARD

Monica Abshire, Clerk

Arnold Bellow, Bailiff

Plaintiff, John Clifford J King, appears through attorney, Oliver Schrumpf

Defendant, Renee Amos Notary Public Notary ID# 29374 and Hartford Fire Insurance Company, appears through attorney Edward Bauman

COURT RULING:

The Court ruled that the four (4) motions filed by plaintiff John Clifford J King (not through his attorney) are fixed for hearing on Wednesday, January 15, 2025 at 9:00 a.m. and notice given to all parties in open court. The motions are: (1) Plaintiff's Emergency Motion to Recuse/Remove Honorable Judge Ron Richard; (2) Plaintiff's Motion to Vacate Retaliatory Judgments; (3) Plaintiff's Motion to Strike and Seal Identifying Information from Public Record; and (4) Plaintiff's Motion to Intervene to Prevent Further Judicial Harassment and Loss of Life.

The Court ordered plaintiff's counsel, Oliver Schrumpf, to provide the plaintiff's New Jersey address to be sealed in an envelope for the Court only. Upon review of the address provided by Mr. Schrumpf, the Court rescinds the order as the address provided is already in the record (plaintiff's address on N. Louisiana Avenue in Lake Charles, LA).

The Court *sua sponte* rescinds the Order granting plaintiff's *in forma pauperis* status retroactive to the day of granting same, or August 13, 2024.

A TRUE COPY
Date: 1-10-2025
Clerk

LAKE CHARLES CITY COURT
118 West Mill Street
Lake Charles, LA 70601

STATEMENT

January 7, 2025

John Clifford J King
vs. 23-2124
Renee Amos Notary Public Notary ID# 29374
and
Hartford Fire Insurance Company

Transcript of testimony of hearing on December 30, 2024
Judge Ronald C. Richard

31 pages $ 170.50

paid in full
MA

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING Plaintiff	*	
VERSUS	*	NO. 23-2124
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 Defendant	*	

* *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 30th day of December 2024, beginning at 9:00 a.m.

APPEARANCES

FOR THE PLAINTIFF,
JOHN CLIFFORD J KING:

OLIVER SCHRUMPF
SCHRUMPF LAW OFFICE, APLC
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663
(337) 625-9077
EMAIL: oschrumpf@schrumpf-law.com

FOR THE DEFENDANTS,
RENEE AMOS NOTARY PUBLIC
NOTARY ID# 29374
and
HARTFORD FIRE INSURANCE COMPANY:

EDWARD K. BAUMAN
1801 RYAN STREET
LAKE CHARLES, LA 70601
(337) 491-0570
EMAIL: ed@lakecharlesattorney.com

* * *

PROCEEDINGS

* * *

COURT CALLED TO ORDER

* * *

THE COURT:

Good morning everyone.

MR. SCHRUMPF:

Good morning Judge.

MR. BAUMAN:

Good morning Your Honor.

THE COURT:

Before we start court, I would love to recognize the incredible Miss Lois. Today is her 80th birthday. Miss Lois, my intention, uh, since we had to drag y'all in today for this special fixing, my intention was to take you to lunch somewhere fancy but in light of Marshal Alcede's funeral, I would ask that if I could take you to lunch maybe later this week. All right. Okay. Calling the matter of ... let me get my binders unclipped ... the matter of, uh, John Clifford King ... good Lord, I can't find

one good style on this thing. Hold on. John Clifford King versus Renee Amos and The Hartford Insurance Company, docket number 23-2124. I have called, sort of, this ... this quickie hearing to address a couple of matters. This case was ... the trial in this matter came before this court back on what date madame clerk?

CLERK:

14th. November 14th.

THE COURT:

November 14th? On November 14th trial was had in this matter. Immediately thereafter, a hearing on contempt was had with regard to Mr. King and having said all that and having the history in place, let's go ahead and have appearances from counsel and then we'll discuss the matter. I believe we have new counsel on board for ....

MR. BAUMAN:

That's correct Your Honor. Ed Bauman and I will be enrolling on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

Okay. I believe I signed, uh, a motion with the other lady ...

MR. BAUMAN:

Yes. You did Your Honor.

THE COURT:

I can't remember ... I just ... her name slips ...

MR. BAUMAN:

Kamie ...

THE COURT:

Kamie. Miss Kamie. Uh, she withdrew and you're enrolled, correct?

MR. BAUMAN:

Correct.

THE COURT:

Okay. Good deal. All right, go ahead Mr. Oliver. Make your appearance.

MR. SCHRUMPF:

I'm Oliver Schrumpf and as you know, I represent John King in the matter which is on appeal now and this Court has no jurisdiction to do anything on that case.

THE COURT:

Uh, well, we'll talk about that, all right?

MR. SCHRUMPF:

Okay.

THE COURT:

I ... I tend to ... tend to agree with you initially that, uh, appeal gets filed and we send it all up to the Third Circuit and we let them take care of things, but I want to clarify something real real quick. On ... at trial, uh, and before trial, I made it very clear to your client Mr. King that there had been a history of multiple filings, letters, phone calls, contact, various things, with the judge's office. He, uh, ultimately retained you and I cautioned him then as well as yourself that as he has counsel and is represented, all pleadings are to be filed through you, okay? That's why we have lawyers in the case. I also will note for the record that at ... at the trial of this matter, we had the trial, and then immediately subsequent to trial, we held

our rule for contempt with regard to various behaviors of Mr. King. The ... unfortunately, you advised the court that you were not retained to represent him with regard to the contempt matter and you existed the courtroom sir.

MR. SCHRUMPF:

Absolutely.

THE COURT:

Uh, and since that time, Mr. King's efforts at filing things with this court have continued okay? As you well are aware and you've been copied on this and opposing counsel was not copied on these filings and pleadings that were, I believe, made on December 12th, okay? And the reason I'm taking this rather unusual action of having us here today to talk about the matter is that, uh, on December 12th Mr. King filed various motions with the court which I believe you have copies of. Am I correct counsel?

MR. SCHRUMPF:

I was copied on the email.

THE COURT:

Okay. And, uh, we all agree that opposing counsel, Miss Kamie at the time, was not copied.

MR. SCHRUMPF:

I don't know.

THE COURT:

Well, if you look at his emails, she wasn't, okay? You were. I was and madame clerk was but opposing counsel was not copied. Once again, this leads to more confusion about all parties not being properly advised as to what's going on in the matter. Specifically, he filed motions entitled Emergency Motion to Recuse / Remove Honorable Judge Ron Richard; Motion to Vacate Retaliatory Judgments; Motion to Strike and Seal Identifying Information from Public Record; Motion to Intervene to Prevent further Judicial Harassment and Loss of Life. Once again, in those motions making the very substantially similar statements that led to the contempt rule in the first place. Now, I will admit Mr. Schrumpf, you caught me off guard when you

said, I don't represent this gentleman with regard to contempt and you walked out the courtroom. There was so much going on that day due to the behavior of your client and quite frankly, his wife, that it caught me off guard. In hindsight, I would have instructed you to remain in the courtroom and advised you that you signed on to represent the guy and if you represent him, you can't just bifurcate the representation on his actions with regard to the court and I would have required that you stay for the matter of the rule for contempt, okay? Now since this filing of December 12th that he has made, the glaring confusion and chaos created by a lawyer saying, I represent the guy but not in everything in this case, has become more apparent, okay? And so I am instructing you now that you represent him in this docket number, okay? And I am going to set everything he filed. I'm going to set for hearing and I'm gonna give notice to everyone in this courtroom of that hearing date and we're gonna come

back and have a hearing on it. The reason I'm not having a hearing on these things today because I think we had to get out of the way first, who's who. Okay, who's driving the ship? And you're either driving that ship or you're not driving that ship. This isn't a family matter where one lawyer takes over property settlement issues that come after custody and child support and all those sorts of things. This is the matter and in the very matter, he is continuing his behavior that is causing much chaos and confusion with the actual legal process. All right? I am setting the matter for January 15th at 9 a.m. You can have your client here or not. I prefer that all parties be here. All parties are entitled to be here. I am instructing everyone to have their clients here, all right? But, we're gonna have a hearing on these matters that day.

MR. SCHRUMPF:

What ...

THE COURT:

... now I want to ...

MR. SCHRUMPF:

... what is being said ...

THE COURT:

... hold on one second.

MR. SCHRUMPF:

Okay.

THE COURT:

One of the reasons why I'm having to take this extraordinary action is that in Mr. King's motion that he filed himself without you, his lawyer, he makes again statements allegedly accusing this court and its staff of improper behavior. In fact, on January, I believe it was 12th, uh, I mean I'm sorry, December ... I'm already jumping to next month. I'm just hoping. On December 12th, uh, when these motions were filed, Mrs. King had either that day or immediately before, called this courthouse, got Miss Kay Bang on the phone who is the paralegal that basically runs upstairs for us and advised her that my behavior and her behavior had led to the murder of a man in Iowa, Louisiana on December 11th and that there were, uh, a

quote/unquote, white man went her in-laws house looking for her due to me, uh, this court putting this case on PACER. Let the record reflect PACER is a federal court record retention filing service. Nothing from Lake Charles City Court would be available on PACER, whatsoever and that this gentleman was shot six (6) times and killed in Iowa and that me and Miss Kay Bang are responsible for that. And then on top of it, that it was such a big deal, three (3) police helicopters were circling that part of Calcasieu Parish to locate the man. Okay? I'm giving you some background as to why we gonna get who's who running the ship on each side here. All right? I will just note for the record that I have verified, and my staff has verified, through law enforcement in Calcasieu Parish, that there were indeed no murders in Iowa, Louisiana on December 11th or according to one of the chiefs at the Sheriff's Department, no murders in Iowa at all this year. All right? And the closest police helicopter to be used in

... in Louisiana with relations to Lake Charles would be Baton Rouge and I don't believe we have three (3) of them. Okay? It's that kind of behavior that is necessitating me having a hearing on these issues but having me do what I'm doing today which is to say, we're having the hearing and you're they're lawyer. You're his lawyer. Okay? That's the order of the court. Now, in another matter, another issue, as you're aware, there is currently a rule of contempt that has been filed for this, noticed by this court with regard to Mr. King's wife, Mrs. Shunte King and, uh, service with regard to that rule, uh, this being due to her calling ... illegally calling 9-1-1 in the middle of the trial and having EMTs show up in this courtroom concerned that someone was having ... they had been told that someone was having a seizure in the courtroom which was all a complete lie and a complete fabrication and untruth. The addresses provided by your client, both on Louisiana Avenue, Simmons Street, and the Iowa address have

all come back as, she does not live there, neither does he, although that's the information provided. Now, Mrs. King made certain assertions, uh, both in various writings, phone calls and on the stand in the trial wherein you were counsel, that there is some ... some very important reason as to why she is in witness protection or something of that nature and her ... her personal information should not be provided to the public or put in a public record due to, uh, some bad people wanting to get her and, uh, our understanding is that is what she alleged happened December 11th. That we released her whereabouts, or her contact information, and these ... this bad man showed up at her in-laws house in Iowa, Louisiana and a death resulted, all of which we have established is completely not true. So what we have here is your client filing things with the court; his wife calling the court making statements; this court unable to serve her with regard to that because the addresses they have

provided locally are indeed not valid. So, I am ordering you, and you may do this under seal and no one will see this. I want to be very clear. It will be placed in the record under seal. I am ordering you to provide the address of Mr. King at his home in New Jersey. This court, I will tell you right now, intends to have her served through Long Arm Statute.

MR. SCHRUMPF:

I'm sorry. Say that again please.

THE COURT:

This court intends to have her served through Long Arm service. Okay? I'm ordering you to provide that today before you leave the courtroom.

MR. SCHRUMPF:

If I have it.

THE COURT:

You have an address for him. You have received payment from him. You have it. This court is done with people playing coy with the rules and with the law. This is the way it works. People get

a lawyer or they don't get a lawyer. They come to court. They state their case. If they win, they win. If they don't like it, they appeal. This is how it works but the kind of behavior that has been exhibited here will not be allowed and this court and it's staff being accused of being involved in a murder will not be allowed. Period. Now, having said my peace and what I have ordered to be done, the court can hear you.

MR. SCHRUMPF:

The court will what?

THE COURT:

Will hear you.

MR. SCHRUMPF:

Judge, I did not prepare the motions that were filed by Mr. King. I did not ...

THE COURT:

... I agree with you.

MR. SCHRUMPF:

... get counsel from it. I didn't know it was gonna be filed.

THE COURT:

I believe you.

MR. SCHRUMPF:

And I ... I have nothing to do with those motions.

THE COURT:

I believe you.

MR. SCHRUMPF:

Okay.

THE COURT:

One hundred percent (100%). I do not think that you have been involved in any of this behavior. I think you have the reality of a client who is probably not listening to what I believe would probably be your very good advice. I ... I ... you are very well respected by me. I have always believed you to be an upright and intelligent and very capable attorney, uh, and I simply am going to require that, since you're the attorney on this case, you're the attorney for everything on this case with regard to Mr. King, okay? Now, so, my order is that's when the hearing on all of these things he filed, unless he

withdraws them before that date, okay? That's ... I guess that resolves that matter.

MR. SCHRUMPF:

Unless what?

THE COURT:

Unless he withdraws them before that date, we're gonna have a hearing on those matters on that date, okay? I am ordering that you provide his home address. It will be placed under seal. Mr. Bauman, we've sort of ignored you. My apologies. Do you have anything you wish ...

MR. BAUMAN:

... quite all right, Your Honor.

THE COURT:

... to say?

MR. BAUMAN:

Just absorbing it all in.

THE COURT:

Okay. Now, having said all that, we do have one other matter that needs to be addressed. I granted, back on

August 13th of this year, I had granted pauper ... I granted pauper status to Mr. King. Now, this came after he had made multiple attempts at achieving pauper status and I had denied them each time simply because there was no affidavit attached, or there ... whatever. Things weren't filed in the record. Anyhow, it was just procedural stuff and quite frankly, I wasn't denying it based on any of the information he placed in it, it just wasn't procedurally correct so we would deny it, send it back and say hey you need, one two three, or whatever it was. In August, I received his pauper status request and, uh, and it looked procedurally right so I signed off on it and I granted pauper status. Okay? Subsequent to that, he hired counsel and in fact, in one of his hearings subsequent to me granting pauper status, he advised that he spent twelve thousand dollars ($12,000.00) on lawyers in this past year, okay? Information which he did not place in the pauper affidavit and which would

have been a ... a very relevant piece of information to me in granting pauper status because if you've got twelve (12) grand to hire lawyers, then you can pay the court costs in City Court. Having recalled that and after he made that statement, I actually went back and took a look at the pauper status, uh, pauper request and I noticed something else that, uh, I am rather embarrassed that I missed, but I just don't know if I didn't remember the wife's name or whatever, or if I really knew, but, uh, and I'll provide this for everyone in the courtroom to look at. But, the ... as you well know, any pauper affidavit must be accompanied by a third party affidavit by someone who knew he person, knows their situation and can say, uh, I know Lois and she's, uh, hadn't worked in ten (10) years, and whatever. And I can say speak some truth to her assertion that she is a pauper. And of course, a third party would be, in my case, Mr. Bauman or you would be a third party to me. You're not married to me. You're

not my first cousin or you know, whatever, my dad or ... etcetera. However, in reviewing this, I realized that the third party affidavit was executed by Mr. King's wife, Shunte King. Okay? Now, uh, I did not realize at the time that was his wife, uh, and when everything's written in cursive, it's kind of open to some interpretation but going back and taking a good look at it, I realized, uh, that she did that. That would of course be improper and would make the affidavit null and void because it's not executed by a third party. It's executed by his wife. She's not a third party. Not only is she not a third party, she's such a close party that Louisiana law would require that we couldn't even make her testify against him because of spousal privilege. The very nature of being a third party would mean no privilege there. So, this Court will sua sponte rescind the order for pauper. It is not procedurally correct. It is not properly done. It is therefore not a legal filing and so the court is gonna order

that the pauper status be rescinded retroactive to the date of granting and the court would caution everyone to be mindful in any statements made in any, uh, future such motions, uh, because a statement of having twelve thousand dollars ($12,000.00) to spend on lawyers means you got a couple hundred dollars to spend on court costs. Anyhow, all right ...

MR. SCHRUMPF:

Judge, I ... I ... as the ... since I am their attorney, at this point I have to say that this Court has no jurisdiction to take the action you just ordered under Code of Civil Procedure Article 208a, there are certain things that the court can do ...

THE COURT:

... uh huh ...

MR. SCHRUMPF:

... after the appeal has been granted.

THE COURT:

Right.

MR. SCHRUMPF:

And that's not one of them.

THE COURT:

But you ... your problem here sir is that your client continues in the behavior. Your client can't keep invoking the jurisdiction of this court and then claim that this court has no jurisdiction. There has to be consequences for continuing to involve. So what I suggest is, shall I speak bluntly? Get a grip on your client and tell him to stop. Okay? Because as long as he's gonna file things here, this court's gonna have jurisdiction. Okay? You don't get to say, oh, I'm appealing it and therefore I can just do and say whatever I want to this court. I can make whatever allegations, assertions I want regarding this court. I can file things in the record. I can continue to obey court orders and if you think that the Code of Civil Procedure in any way, shape or form allows for this kind of behavior and then you get to hide behind, I filed an appeal, I beg to differ.

Okay. That is not what it meant. I'm not able to make any rulings generally. I can't go back and redo things. I can't undo things. I can't ... there's all sorts of things I shouldn't be able to do except he keeps addressing the court and filing pleadings and his wife continues with her contemptuous behavior. Okay? And so, I don't like doing this. I don't know what the right thing is to truly do but I know that this behavior's gonna stop one way or the other, period. We're not gonna have this. Anything Mr. Bauman?

MR. BAUMAN:

No Your Honor.

THE COURT:

All right. Mr. Schrumpf ...

MR. SCHRUMPF:

I will see ...

THE COURT:

Do we have an envelope Miss Bang? Somebody get me an envelope. He's gonna put the address in the envelope. It's gonna be sealed and tendered to the court. This information will not be

revealed to anyone other than immediate court staff or, uh, or deputy marshals who are involved in the Long Arm Service process regarding Miss King.

MR. BAUMAN:

Your Honor, I'm filing a motion to enroll with the Third Circuit regarding the appeal.

THE COURT:

Yes sir.

MR. SCHRUMPF:

And ... and Judge, there's no jurisdiction to sign any kind of order. And, I ... I went through this in Allen Parish trying to enroll in a case where someone had taken an appeal and it was denied. I couldn't even enroll in ... because that's not one of the things allowed.

THE COURT:

He's ... he's enrolling in the Third Circuit I believe he just said.

MR. BAUMAN:

Yea.

THE COURT:

He's not enrolling here.

MR. SCHRUMPF:

Oh okay. In the Third Circuit?

THE COURT:

Yea. Once again, uh, your clients have made this difficult situation putting me, you and all parties in a difficult mess. And I'm stuck with trying to find a way to handle this behavior. Give that to Mr. Schrumpf please so he may ... and give him a, uh, he's got a note pad if he can just tear a piece of paper, write the address, put it in it. It'll be returned to me and sealed per my order. Mr. Pete, if you will provide me that, then I'll seal it.

MR. SCHRUMPF:

Judge, you should look at this right now before I leave. That's the address I have in my file.

THE COURT:

Okay. This address is an incorrect address that ...

MR. SCHRUMPF:

... well, that's what you're telling me. That they're not ... you said you tried serving them and they can't be served there. As far as I know ...

THE COURT:

Let me be very clear ...

MR. SCHRUMPF:

... he lives in New Jersey.

THE COURT:

Let me ... let me be very clear. I haven't tried to serve anybody. The Marshal's Office, in doing their lawful duties, has made service, attempted service at three (3) addresses provided by your client. Okay? None of those addresses are where your client actually resides, okay? Your client testified in court that he resided in New Jersey.

MR. SCHRUMPF:

Yes sir.

THE COURT:

His wife testified to that as well, all right? I, due to her statements that she was in witness protection, I did

not require that she provide any information on the record, okay? So, I want to make very sure ... very clear here, you as an officer of the court are telling me that you do not know or have an address where they live in New Jersey?

MR. SCHRUMPF:

I do not have their New Jersey address, correct.

THE COURT:

Okay. All you have is this one?

MR. SCHRUMPF:

This is his address in my file but I used ... all communications have been by the email address which I provided to ...

THE COURT:

... well that's how they're ... that's how they're cooperating with this court. I'm just unaware of any way to do service via email, okay? This is being placed into the record. It's not being sealed because it's the address that's already in the record. I'll see you on the

15th Mr. Schrumpf.

MR. SCHRUMPF:

Okay.

MR. BAUMAN:

Thank you, Your Honor.

THE COURT:

Thank you gentlemen. Court's adjourned.

* * *

END OF HEARING

* * *

STATE OF LOUISIANA :

PARISH OF CALCASIEU :

REPORTER'S PAGE

I, **Karey J. Bang, Certified Digital Reporter (1072019)** for the Lake Charles City Court in and for State of Louisiana, do hereby state on the Record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) and/or ellipsis (…) have been used to indicate pauses, changes in thought, and/or talk-overs; that same is the proper method for a Court Reporter's transcription of proceeding, and that the dashes (--) and/or ellipsis (…) do not indicate that words or phrases have been left out of this transcript.

Lake Charles, Louisiana; January 7, 2025.

KAREY J. BANG
Certified Digital Reporter

STATE OF LOUISIANA :

PARISH OF CALCASIEU :

REPORTER'S CERTIFICATE

I, Karey J. Bang, Certified Digital Reporter (1072019) for the Lake Charles City Court in and for State of Louisiana, do hereby certify that this testimony was reported to Shelia Hasty in the digital reporting method, was prepared and transcribed by me or under my direction and supervision, and is a true and correct transcript to the best of my ability and understanding; that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board, or by the Supreme Court of Louisiana, and that I am not related to counsel or to the parties herein, nor am I otherwise interested in the outcome of this matter.

Lake Charles, Louisiana; January 7, 2025.

KAREY J. Bang
Certified Digital Reporter

LAKE CHARLES CITY COURT
POST OFFICE BOX 1664
LAKE CHARLES, LA. 70602

ESTIMATED COST OF DEVOLUTIVE APPEAL

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

COURT COST TO DATE----------	$ 2,228.80
COPIES OF EXHIBITS AND PLEADINGS----------	$ 2,668.00
TESTIMONY – COURT REPORTER (TYPING OF TRANSCRIPTS) -	$ 712.50
HON. RENEE R. SIMIEN, CLERK, COURT OF APPEAL----------	$ 341.00
POSTAGE FEE----------	$ 10.08
Subtotal	$ 5,960.38
Minus Transcript Prepaid	($ 712.50)
Minus Court Cost Deposits	($ 1,000.00)
TOTAL DUE	$ 4,247.88

MAILED TO APPELLANT
CERTIFIED MAIL, RETURNED RECEIPT REQUESTED

THIS 12th DAY OF DECEMBER 2024

APPELLANT:

JOHN CLIFFORD J KING
THRU OLIVER SCHRUMPF
SCHRUMPF LAW OFFICE
3801 Maplewood Drive
SULPHUR, LA 70663

Make Check payable to Lake Charles City Court Under **Article 2126, La. C.C.P. all estimated costs of the appeal must be paid to the Clerk within 20 days.**

COPY

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING Plaintiff	*	
VERSUS	*	NO. 23-2124
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 Defendant	*	

* *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 14th day of November 2024, beginning at 11:00 a.m.

APPEARANCES

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P-2 Copy of ID of Charmaine Colston 19

P-3 Copy of front of Vehicle Title 28

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DEFENDANTS' EXHIBITS:

None

PROFFERS

BY PLAINTIFF:

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Copy of CrossFit check-in dated 9-7-21 (previous marked as plaintiff exhibit 4) 30, 114

Proffer-2
Copy of CrossFit check-in dated 9-8-21 (previous marked as plaintiff exhibit 5) 34, 114

Proffer-3
Affidavit of CrossFit (previous marked as plaintiff exhibit 6) ... 38, 114

Proffer-4
Copy of Bank Statement (previous marked as plaintiff exhibit 7)... 43, 114

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* * *

PROCEEDINGS

* * *

COURT CALLED TO ORDER

* * *

THE COURT:

Good morning everyone. We have a number of things on the docket. I'm gonna try to move the, what I would call the quickie stuff, uh, and so I believe we have an eviction matter on the docket.

* * *

OTHER MATTERS CALLED

* * *

THE COURT:

All right. You may be seated. All right, counselors do we have everybody here? Do we ... I'm gonna call the matter of John Clifford J King versus Renee Amos, docket number 23-2124. Looks like we all have counselors here. All right, counselors make your appearance and then we'll have the witnesses sworn in.

MS. DOMINIC:

Good morning Your Honor. Kamie Dominic

on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

All right. Oliver?

MR. SCHRUMPF:

Oliver Shrumpf for John Clifford King.

THE COURT:

All right, now, Miss Amos, please raise your right hand. Mr. King, uh, you stay seated. I know you got your back. Raise your right hand, let's get you sworn in. Oh whoa, whoa, we got another witness. Any other witnesses in here? You a witness sir?

MS. DOMINIC:

No.

THE COURT:

Where's Ms. King?

MR. SCHRUMPF:

Ms. King is outside.

MR. KING:

In the lobby.

THE COURT:

Let's ... let's grab her real quick. We'll just get everybody sworn in at one time and that way we get it knocked out.

MS. DOMINIC:

And Your Honor, and then any witnesses besides Mr. King and my client, ask to be sequestered from the courtroom.

THE COURT:

Okay. No problem. No problem. We gonna do that and I can give them the sequestration speech when they come in. Just FYI, my staff, uh, we have ordered lunch and we will eat right through trial, uh, because I think we can move this along rather quickly. But, we hadn't had breakfast since 6:30 and we hungry. All right, now we got her in here ... all right, ma'am give us your full ... well, let me get you sworn in first and then we can ... all right, everybody raise your right hand.

(THREE WITNESSES SWORN)

* * *

RENEE AMOS

JOHN CLIFFORD J KING

SHUNTE KING

* * *

Witnesses called on behalf of the plaintiff, John Clifford J King and on behalf of the defendant, Renee Amos Notary Public

Notary ID# 29374, having been duly sworn by the Deputy Clerk of Court, were examined, and testified on their oath as follows:

THE COURT:

All right. So, I've got them, uh, uh, notified ... ma'am, give us your full name for the record real quick. Just speak loudly towards the microphone.

MRS. KING:

My name is Shunte Jones King.

THE COURT:

All right. Good deal. All right, Ms. King, what we're gonna do is, uh, he's a witness, she's a witness, but they're also parties so they get to stay in the room. You're a witness ... are you a witness? Okay, so, uh, you're gonna be put under what's called the rule of sequestration. That means you got to sit outside in the lobby and hang out until it's ... you're called to get on the witness stand. After you get on the witness stand and they're done with you, then you get to stay in the courtroom, okay? So you're gonna have to just take a seat outside and hang out until they call you in.

MRS. KING:

I'm supposed to bring something to your attention. I'm required by law, uh, by the state attorney general to ...

THE COURT:

Not right now. We'll do that when I bring you in, okay?

MRS. KING:

Okay.

THE COURT:

The rule of sequestration is in effect. Please remove yourself to the lobby. All right. All parties may have a seat. Now, uh, Mr. Schrumpf, you're the moving party with the plaintiff. So, uh, the ball is in your court and the way we're set up here with minimum number of witnesses, uh, I suggest we just keep everybody in their seats. Makes it easier, plus I don't want Mr. King having to come up and down where the witness stand is, okay? And just everybody remember, speak to the microphone. Mr. King, you got to get it to the microphone. Ms. Amos, got to get it to the microphone, okay? All right, go ahead Mr. Schrumpf.

MR. SCHRUMPF:

Your Honor ...

THE COURT:

... Any pretrial matters we need to address?

MR. SCHRUMPF:

Did you receive the pretrial memo that I sent?

THE COURT:

I did. I've received your pretrial memorandum.

MR. SCHRUMPF:

Okay.

THE COURT:

I've reviewed it ...

MS. DOMINIC:

And Your Honor, at this time, I would like to object to certain things that's in the pretrial brief. I wasn't ... my understanding it wasn't required of the Court ...

THE COURT:

It was not required.

MS. DOMINIC:

But I do ... oh so sorry.

THE COURT:

Get that mic. Sorry.

MS. DOMINIC:

Sorry. As I was saying Your Honor, I would like to object to certain things that's in a pretrial brief. As I ... as I mentioned, it wasn't a requirement of the Court but I am requesting, uh, to the Court to strike the mention of the fifteen thousand (15,000) purchase price from the pretrial brief due to lack of supporting evidence. Uh, the fifteen thousand (15,000) was due to the purchase ...

THE COURT:

.. let me, let me ...

MS. DOMINIC:

... alleged purchase price.

THE COURT:

Let me cut you off real, real quick. The pretrial brief is not evidence.

MS. DOMINIC:

Okay.

THE COURT:

It is not considered as such. I don't think it was actually even filed into the record. It was just provided to the Court 'cuz

that's what pretrial briefs generally are done. I'm sorry ma'am. I'm not worried about the pretrial brief. It don't mean anything to me one way or the other. It's just one side's way of kind of saying, hey here's what we're gonna do and here's what we think. It's got to get on here under oath before it means squat diddly to me, so don't ... I'm ...

MS. DOMINIC:

Yes Your Honor.

THE COURT:

... I'm just going to disabuse you of your concerns. You don't have to worry about that.

MS. DOMINIC:

Thank you Your Honor.

THE COURT:

Okay. So don't ... don't sweat that. Do we have any other pretrial matters? Any agreement on evidence? Anything of that nature?

MS. DOMINIC:

No Your Honor.

THE COURT:

You don't' have anything? Okay, well

let's get this party started. Go ahead Mr. Schrumpf.

MR. SCHRUMPF:

I'd like to call Renee Amos under cross examination.

THE COURT:

Okay. Now, Ms. Amos let me ... your lawyer will tell you this but let me give you sort of the quickie protocol. He's calling you as a witness under what's cross examination. He's not calling you under direct examination. That means he basically gets to treat you as a hostile witness in the sense of he gets to ask some leading questions and he gets to do things a little differently than he would be allowed to do, say with his own client, under direct examination. So, listen to the question. Answer the question to the best you can. If you're unsure, you have counsel. Look at counsel, uh, and I caution both sides. If you're testifying in any way Ms. Amos or Mr. King and your lawyer starts talking, quit talking all right? He's trying to, she's trying to do her job. Be quiet and let them do their job, okay? All right. Go ahead.

MR. SCHRUMPF:

May I approach?

THE COURT:

Yes sir. Thank you Ollie. It'd be nice if the judge can see some stuff.

MR. SCHRUMPF:

I'm gonna do it.

THE COURT:

Merci bon. Let me see ...

* * *

RENEE AMOS

* * *

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on her oath as follows:

* * *

CROSS EXAMINATION

BY MR. SCHRUMPF:

Q. Ms. Amos, please state your full name.

A. Renee Amos.

Q. And, what is your address?

A. I beg your pardon.

Q. Your address?

A. 1208 17th Street, Lake Charles, Louisiana.

Q. Are you a Louisiana Notary?

A. Yes, I am.

Q. Notary number 29374?

A. Correct.

Q. And you furnished a bond as required by law?

A. Yes.

Q. To be a notary? Do you have any additional insurance besides the insurance bond?

A. No, I do not.

Q. Do you know Charmaine Colston?

A. I'm aware of the name. I do not have a relationship with her.

Q. On September 7, 2021, did you do notary work for Charmaine Colston?

A. On September 7th of 2021, per the back of this title, that is my signature but I would also say ... I would stipulate that and explain there were two (2) people present.

Q. So is Exhibit 1 the, uh, notary work that you did on that date, September 7th 2021?

A. This is what you're talking about?

Q. Yes ma'am. I've labeled it Exhibit 1.

A. Since there's not a front of it, I do not see the front of the title, but it is my signature, so ...

Q. I have ... I have the front. It's coming up ...

A. Well, I don't see the front so this is my signature, if that's what you're asking.

Q. Okay. I offer Exhibit number 1 Your Honor.

THE COURT:

Okay. I'm ... and I'm trying to see where everything is too. I see a Charmaine name. I see a P.O. Box. I see a Charmaine (indiscernible) maybe ... I'm ... I'm trying ... and it's just so dad-gum blurry, I'm trying to figure out what it ... what it's saying.

MS. AMOS:

Uh huh.

THE COURT:

Where is ... oh, I see Ms. Amos' signature, uh, okay, all right, I got that part down. All right. Any objection counselor to the introduction of this into evidence as Plaintiff 1?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it will be admitted as Plaintiff 1. There you go Madame Clerk.

BY MR. SCHRUMPF:

Q. And the import of Exhibit 1 is a transferred title from John King to Charmaine Colston?

A. That is what it indicates, yes.

Q. Okay. And you kept an ID for that transaction, did you not?

A. My practice is to check the IDs of all parties, the buyer and the seller.

Q. And, I've shown you exhibit 2. Is ... exhibit 2 is the ID that you had for that transaction?

A. I cannot see the ID. I see the name of Charmaine Colston, so I will make the assumption that this is in fact her ID although it's not legible.

Q. Okay. I offer Exhibit 2 Your Honor.

THE COURT:

All right, subject to our identification issues, I think we all agree that that's the ID or driver's license or something. Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it'll be entered as Plaintiff 2.

BY MR. SCHRUMPF:

Q. Those documents were obtained by the Calcasieu Parish Sheriff's Office? Did ... did they get them directly from you?

A. No ma'am, no sir.

Q. I see there was no ID attached for John King.

A. I do not have a duty to keep copies of IDs. I check the ID and validate it when they're in my office. I would not have a copy of Mr. King's ID nor Ms. Colston's ID for that matter.

Q. And John King, uh, you have no ID for him from September 7th 2021?

A. I beg ... ask that question again. I'm sorry.

Q. You do not have an ID showing that John King was present on December ...

A. ... I ...

Q. ... September 7th 2021?

A. On September 7th 2021, per my practice, I would have seen the ID of John King as the purchaser, as the seller excuse me, and Charmaine Colston as the, uh, as the purchaser, but I do not have copies of those IDs.

Q. Do you know John King?

A. I do not know him.

Q. Would you recognize John King if you saw him?

A. The first time I ... I would ... I don't ... I saw

him that one (1) time in my home. Would I have recognized him if I had not seen him in this courtroom previously, no sir I would not.

Q. It's your testimony that two (2) people showed up on September 7th 2021. One of them was Charmaine Colston. Did you identify John King?

A. My testimony is that I identify the buyer and the seller. Two (2) people showed up. I identified Ms. Colston and I identified Mr. King. I had to have identification. That identification could have been an ID, a driver's license, in some cases a passport, but both parties were properly identified before I proceeded.

Q. Ma'am, was the title ... the back of that title already signed by someone before Ms. Colston came in with it?

A. No. The title was blank on the back. My ... my policy is to look at the title. I look at the front of the title first to make sure who the sellers are. Sometimes there are more than one sellers. I then turn the title on the back. Had there been a signature on the back, I could not have proceeded.

Q. It would have been wrong to notarize it if it had already been signed, correct?

A. If it was ... if it was already signed, I would

have ... if it was signed by Charmaine Colston I would have identified her and asked her why she signed it. If it was signed by John King, I would have validated that, but there was no signature on the back of the title. In those instances, the next thing I would have done if I had some suspicion was I would have gone to the Justice of the Peace. So, I would not have proceeded if I saw anything wrong.

Q. So you have an excellent memory of what occurred on that date?

A. I do not have a memory of what occurred on that date. That's been four (4) years ago. I do have an excellent memory of my process and procedure and my process and procedure does not change.

Q. This says that the consideration was one hundred dollars ($100.00)?

A. Sometimes when people do not want to do donations, they put a small price on it. What price they tell me that they pay is the price that I put in there. I have no obligation and no ... I do not have to watch money transfer. I ask what they paid. That is not part of what I am required to do. I am required to validate identification.

Q. So you did not see the hundred dollars ($100.00) transferred?

A. I cannot remember.

Q. Was it a check?

A. I do not know sir. They could ... I have no idea how they transferred it. It's very possible they transferred money in front of me but I do so many of these, uh, often times money is transferred, yes, and I'm not involved in that. I don't count it. I don't have anything to do with that. Not my job.

Q. Ms. Amos, would you agree that if John King was in New Jersey on September 7th 2021 that he could not have been the one that signed that document?

A. I have no idea, uh, I will not agree or disagree with that. I'm going to say that someone was in my residence on that day representing themselves as John King. I looked at a driver's license, identified it.

Q. But you did not keep a copy of the driver's license of the person that said he was John King?

A. Sir, I don't keep any driver's license. The massive amount of people that I see in a day, I could not possibly keep those records. I identify them and I move on.

MR. SCHRUMPF:

I tender the witness.

THE COURT:

All right. Ma'am, I guess if you wish

to, uh, do some directing and some follow up on his cross, go ahead.

MS. DOMINIC:

At this time Your Honor, I will waive that and wait, uh, to do my ... I'm sorry, call of chief ... chief of ...

THE COURT:

Call your case in chief?

MS. DOMINIC:

... to call my case in ...

THE COURT:

I hear you. I got you, okay. All right, thank you ma'am. I ... I want to commend you. You're doing ... you ... you talk into the microphones. That is a big deal, y'all. Keep it up. It helps Madame Clerk. It's hard on the lawyers and I guess maybe we need to get body mics before it's over with 'cuz the lawyers need to move around. They don't want to use you deputy, I don't know. You can hand them to the deputies and they'll do all the transporting around that way you don't have to ... to scurry.

MR. SCHRUMPF:

Yes, okay.

THE COURT:

And deputies, feel free to step up to get the stuff. You don't have to wait for him. I get it. The Marshal likes that process. I like that process. It keeps things orderly.

MR. SCHRUMPF:

Judge, I'm want to call John King.

THE COURT:

All right. All right, Mr. King, you are on the witness stand even though you're sitting in your seat, okay?

MR. KING:

Yes sir.

* * *

JOHN CLIFFORD J KING

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on his oath as follows:

* * *

DIRECT EXAMINATION

BY MR. SCHRUMPF:

Q. Please state your name.

A. John Clifford Joseph King, Sr.

Q. And where do you reside currently?

A. I am a resident of Louisiana, but I'm currently in, uh, New Jersey due to my wife ...

THE COURT:

Louder.

A. I am currently ...

THE COURT:

There you go.

A. I am a resident of Louisiana. I am currently living in New Jersey with my wife. She is a dual resident of New Jersey and Texas. She owns her house.

Q. How long have you been living in New Jersey?

A. I initially got my contract, uh, to go to New Jersey November of 2020 and, uh, I've been working ... well, I was working there until the end of 2021 and I got hurt and I'm using her insurance to ... while I'm hurt. So I've been there since 20 ... November of 2020.

THE COURT:

Mr. Schrumpf, we got to get you to the mic because the clerk ...

MR. SCHRUMPF:

I'm sorry.

THE COURT:

The court reporter ...

MR. KING:

I'm sorry.

MR. SCHRUMPF:

We'll both have to ...

BY MR. SCHRUMPF:

Q. All right. I show you exhibit 3, what I've labeled exhibit 3. That's the front of the Certificate of Title. Is ... is this for a vehicle that you had purchased?

A. Yes.

Q. And this says it's a 2011 Chevrolet Traverse and it's got the V-I-N number and all. Shows that you, uh, received this in April of 2021?

A. Yes. That's when I, uh, I paid it off, uh, April 5th 2021.

Q. You said that's when you paid it off?

A. I paid it off. The day I paid it off was April 5th 2021.

Q. When did you first acquire the vehicle?

A. I acquired the vehicle, uh, October of 2018.

Q. And what did you use to purchase it? How'd you fund it?

A. Uh, I, uh, I was working as a welding inspector and I used my funds from my job to pay for that.

Q. Did you borrow money against the car?

A. Yes. Yes, I borrowed money.

Q. Who'd you borrow the money from?

A. Southwest Louisiana Credit Union.

Q. And in April of 2021, you paid it off?

A. Yes sir.

Q. We'll get to that document later. All right, I offer Exhibit 3.

THE COURT:

Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. And then it will be entered as defense 3. I mean, Plaintiff 3.

BY MR. SCHRUMPF:

Q. And you're currently under medical care for a back injury?

A. Yes sir.

Q. When did that back injury occur?

A. Uh, May of 2021, I want to say. May or June. I'm not sure the exact day.

Q. All right. And you learned about Charmaine Colston having your car title after you paid it off?

A. Yes sir. The, uh ...

Q. Do you recall how you found out about that?

A. Yes sir. I, uh, I initially ... I went to the court

because she had it and I ... then I couldn't find it and then I filed a police report and when I got the police report back on, uh, October 3rd is when I was able to download the police report, October 3rd of 2022, that's when I discovered who exactly had it.

Q. Did you ever intend to give the car or sell the car to Charmaine Colston?

A. No, not at the time.

Q. Did you intend to, uh, transfer it to her?

A. No sir.

Q. Did you appear on September 7, 2021 before Ms. Amos and sign the ... the transfer of that document?

A. No sir.

Q. Now on Exhibit 1, this says that Charmaine Colston and you both ... and she's testified that both of you appeared. Were you there on September 7, 2021?

A. No sir. I was in New Jersey. I ... at the time, I would ... it would have ... I would have actually been at work.

Q. Did you ever actually see the title?

A. I've never seen the title. This is the only copy I've ever seen.

Q. And this came from the Sheriff's Department?

A. Yes.

Q. After you filed a complaint?

A. Yes.

Q. Do you have evidence that you were in New Jersey on September 7, 2021?

A. Yes. I have multiple pictures, multiple videos. I have, uh, I have my work reports.

Q. All right. Hold a minute. We'll start with exhibit 4.

MR. SCHRUMPF:

One for the judge and one for each of you.

BY MR. SCHRUMPF:

Q. Okay. Can you tell us what exhibit 4 is?

A. Exhibit 4 is my Cross Fit check in. Everyday when we go to class, we get checked in.

Q. All right. You go to class?

A. It's Cross Fit.

Q. And ...

MS. DOMINIC:

And Your Honor, I'd like to ...

Q. ... at the top left of this ...

THE COURT:

Hold on a second. I believe we have an objection.

MR. SCHRMPF:

Okay.

THE COURT:

Go ahead counselor.

MS. DOMINIC:

Yes. I would like to object to it. Lack of foundation, lack of authentication. It really doesn't tell ... it just has Cross Fit on it. It doesn't say where he's at or anything Your Honor.

MR. SCHRUMPF:

So ...

MR. KING:

Okay.

MR. SCHRUMPF:

We'll get to that.

MR. KING:

Yes sir.

MR. SCHRUMPF:

Your Honor, if I may, uh, ask him some more questions about it, I think we'll clear that up.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. At the top left is a date, September 7, 2021. It says HEIC Image. Is this something you get on your phone?

A. This is actually from the, uh, this is from the

Gmail

The Kings <fit4thekings@gmail.com>

Urgent Request to make Judge Richard aware that protected crime victim is testifying.

3 messages

The Kings <fit4thekings@gmail.com> Thu, Nov 14, 2024 at 12:59 PM
To: Ron@lccitycourt.org
Cc: kay.bang@lccitycourt.org
Bcc: truekingfile@gmail.com

Good Ms Bace, and Judge Richard,
memo 11.14.2024

I'm required in writing to inform Judge Richard that I am a protected crime victim by the Texas state Attorney general and I am requesting that all crime victims rights for protection and privacy be afforded to me in light of recent events. I fear a misstep will expose myself and my family to danger. The notices from the Attorney General are attached as well as a police report detailing my somewhat gruesome crime with certain details of assault by these men being redacted for my safety. I'm asking that Judge Richard be informed of these exceptions prior to public record testimony .

I am willing to discuss and explain in Chambers with my lawyer and advocate so that I am not requested to testify to anything that may threaten my life and the lives of my family..

Please handle the attached with utmost discretion as my life and safety depends on it and the case against the gentlemen is ongoing.

Thank You and thank you in advance for your professional courtesy in this matter.
Shunte Jones King
(enclosure three attachments with exhibits.

Thank You so much

3 attachments

Crime Victim Letter Judge R Richard 11.14.2024 (1).pdf
344K

Shooting of King Case still open .pdf
105K

Judge Richard Assault Victims Report
3711K

The Kings <fit4thekings@gmail.com> Tue, Nov 19, 2024 at 11:52 AM
To: truekingfile@gmail.com

[Quoted text hidden]

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3711K

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

***Amended to include evidence of grounds for Judicial Intervention due to what appears to be efforts of judicial bias that may be known to Judge Richard. There have been repeated efforts to intimidate existing counsels, and dissuade new counsel from enrolling into the case by means of ex parte communications. Efforts to deny rights to legal counsel, documented multiple attorneys have attempted to enroll and have been dissuaded by the clerk's office with misleading rhetoric. Special privileges such as the attendance of Orelia Lawdins - Trent legal counsel for Charmaine Y. Colston whom I am a registered domestic violence victim and continue to suffer harassment and stalking examples of this are seen in the Court Records for case #23-2124 as Charmaine Y Colstons attorney said she could not be served as she was not party to the case however the documents she requested by conformed copy mailed to her are in fact grounds for adequate service as Charmaine Colston herself requested the documents. Her then attorney was allowed to attend closed proceedings for the trial on May 21, 2024 prior to a non related family court trial on May 25, 2024 and her presence was inaccurately not recorded into the record as required by law as all non interested parties were asked to be removed from the courtroom and she was not enrolled as council nor was she a witness and this violation was permitted .

Clerk's office denies ever speaking to any attorneys but their efforts to enroll have happened repeatedly since July and they were told Judge Richard is unhappy (refer to evidence and exhibit attached) please refer to documented emails and subpoenas that show at least 5 separate attorneys were either intimidated, told misinformation, told information with intent to dissuade enrollment. There is also the disregard of the untimely filed motions of Kamie Dominic on Oct 31, 2024 where she was required by law to serve concurrently upon both Judge Richard and the plaintiff John King Sr her motions and arguments and she did not. Counsel was allowed to make defamatory lies of infidelity in Kings marriage claiming involvement of a paramour where no such paramour exists. Refer to Louisiana legal definition of paramour, (current sexual / romantic nature person of interest or mistress) how can this be when King was cohabitating with spouse and married at the time the negligence and fraud by Amos occurred ? Additionally all ex girlfriends cannot be considered paramours and Colston is not the immediate preceding romantic partner prior to Kings spouse. If there was a paramour by legal definition it would apply to any persons of romantic nature prior to current spouse, and post any involvement with

on/ off again relationship with ex girlfriend Charmaine Y Colston. In addition Ms Dominic leaves room for misinterpretation as she makes a salacious claim of paramour without any relevance to the case. She screams that Amos' reputation deserves consideration yet it is unethical and she has no evidence of any paramour as King had not seen Colston in person for 13 months prior to transfer of his vehicle illegally. Im asking that this line of Kamie Dominic petition be stricken from the record as it creates risk for King in future legal proceedings that either his current wife, or ex girlfriend can use Dominics petition as proof of an existing Paramour during the marriage and depending on state in which possible divorce proceedings could be filed this could have detrimental financial damaging effects to King.

Lastly and most importantly after reviewing this case with hospital attorney, and the policy of SW Airlines, United Airlines, TSA, Port Authority and the laws of HIPAA and the additional medical procedural protections allowed by the state of New Jersey to seek legal injunction and or restraining order if evidence of violation of civil rights exists or any order by an out of state judge poses immediate threat to patients life or standard of care. Judge Richards inability to consider zoom appearance on an immobile plaintiff who cannot meet clearance standards to fly prior to November 13, 2024 as right now a no fly order is in place for John King due to spinal cord swelling resulting in temporary paralysis and seizure. The request by Judge Richard to appear only in person less than 24 hours after admission for follow up care as documented in the patient chart is not only unreasonable but unconstitutional and deadly. No reasons have been provided as to why Kamie Dominic had 6 months to file her motions timely and she did not file within the 15 day window and did not file concurrently as required by law. As a result this intruded on my right to legal counsel. She also served me on November 1 a legal holiday and I have 7 days from that date to have a motion for continuance received by the clerk's office and Tracking number says the wet signature motions were received timely as Nov 1 was a legal holiday in the state of Louisiana.

Additionally, on November 6, 2024 repeated efforts to reach Lake Charles City Court were prevented as the fax and phone lines were down per Dominic, Bash and my wife Shunte King made repeated attempts to contact and was denied on dates of deadline. Additionally this happened on Oct 31, 2024 and I had to send evidence to Monica Abshire via email to be time stamped in time with exhibits and this was not permitted as Monica Abshire claims she could not see attachments to the notarized petition.

At this time and the lack of a status conference or any audio or court transcripts from prior proceedings how can Plaintiff defend the untimely motions presented by Kamie Dominic as all of the evidence points to some sort of bias in the proceedings as “Renee doesn't have a pot to piss in” has taken priority of the life and civil rights of plaintiff John King and requires the intervention of Judge Richard to stop the influences coming from the clerks office as more than one attorney has sent email complaints of clerks office unwillingness to send case file information, unwillingness to act in a timely fashion, and an eager willingness to share Judge Richard position and emotion towards case # 23-2124 which would be grounds for mistrial with the addition of Orelia Lawdins - Trents presence in the court room being left out of the minutes for a

closed hearing as well as Charmaine Colston by order of conformed copy received appropriate service from the clerk's office.

Dear Honorable Judge Richard,
After repeated denials of due process, and several attempts to deny a fair and balanced trial, and repeated ex parte communications, lack of service, and overall what appears to be an effort to provide Renee Amos with a documented unfair judicial advantage it is now necessary to file evidence and petition ito the record for case number #23-2124 and to serve in proceedings for medical intervention protections for grounds for appeal and for out of state judicial proceedings including but not limited medical injunctions to prevent ordered removal from the States of New York and New Jersey for which NJ/NY Port Authority, TSA, and state transportation guidelines for disabled transport are in place that prevent the transport of John C King Sr plaintiff for means of medical emergency.

Additionally as per the evidence attached opposing counsel is being granted liberties that are in violation of due process and Judge Richards own legal precedent that does not permit untimely served motions and evidence to be permitted unto the record. Please refer to

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant’s recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Tracking # 9505514194044309 63

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the "interest of justice" standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant's Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received

notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant’s claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant’s motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the ____ day of _____, 2024, at _____ o'clock AM, Lake Charles, Louisiana.

_____
signature

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

STATE OF LOUISIANA
PARISH OF CALCASIEU

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical

4. Exhibits to accompany motion to intervene to protect civil rights.

John C King Sr
!!/5/2024

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS . NO. 23-2124	:	PARISH OF CALCASIEU
RENEE AMOS NOTARY PUBLIC NOTARY ID #29374	:	STATE OF LOUISIANA
FILED: _____	:	_____ DEPUTY CLERK OF COURT

JUDGMENT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, and his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing this matter and for reasons orally assigned, entered the following judgment:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT READ and SIGNED this _____ day of _____, 2024, in Lake Charles, Calcasieu Parish, Louisiana.

_____
RON RICHARD, JUDGE DIVISION B
JUDGE, LAKE CHARLES CITY COURT

**John CJ King Sr.
Plaintiff, Pro Se**
**VS Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana**

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions**
Dear Honorable Judge Richard,**

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant's recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions
Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

  **Kamie T. Dominic, LLC, #40184
  1400 Ryan Street
  Lake Charles, Louisiana 70601**
  kamiedominiclaw@gmail.com

- "The Hartford": Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of

further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the “interest of justice” standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

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In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

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I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

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- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

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Defendant's motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested
In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Thank you for your time and consideration.

Respectfully submitted,
John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Exhibits attached audio mailed separately.

Respectfully submitted by
John CJ King Sr.
123 N. Louisiana Avenue
Lake Charles LA 70601
truekingfile@gmail.com
318-995-1705

ORDER

Considering the foregoing motion IT IS ORDERED that this matter come on for trial on the ____ day of _____ or the year 2024 or 2025 at _____ o'clock AM Lake Charles, Louisiana this day of _____

STATE OF LOUISIANA
PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared John CJ King Sr., who, after being duly sworn, did depose and say:

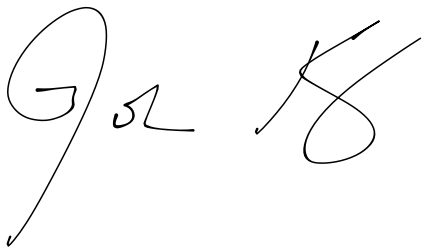
1. **Affiant's Personal Knowledge: I, John CJ King Sr., am the plaintiff in case number VS NO. 23-2124, currently pending before the Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.**
2. **Grounds for Motion: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.**
3. **Request for Continuance: Due to this medical condition, I am unable to attend the hearing scheduled for November 14, 2024, and respectfully request a continuance to allow sufficient time for my medical recovery and to secure adequate legal representation.**
4. **Truthfulness of Submissions: I affirm that all statements and evidence presented in this motion are submitted in good faith, without any intent to delay, defraud, or deceive the Court or any party. The attached documents are accurate and true representations of my medical status and travel**

records, provided to substantiate my request.

5. **Opposition to Frivolous Claims and Sanctions: I further affirm that my responses to the defendant's Motion to Strike and Motion for Sanctions are made in good faith, as I have provided evidence to support all claims filed in this matter. I deny any claims of fraudulent inducement, and I respectfully request that the Court deny the defendant's motions accordingly.**

Further, Affiant saith not.

Signature: _____



John CJ King Sr.

Date: ___10/31/2024_____

Sworn to and subscribed before me this _____ day of _____, 2023.

Notary Public

My Commission Expires: _____

This affidavit should be signed and notarized to accompany your motion.

4o

Shunte Jones-King
P.O. Box 12198
c/o L. Shunte Jones
CVC # [Texas Attorney General]
Austin, Texas 78711-2198
11/14/2024

The Honorable Judge R. Richard
Case # NO. 23-2124

Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana**]
Lake Charles, LA 70601

Re: Request for Sealed Records and Testimony for Protected Crime Victim, Shunte Jones-King, in Accordance with Texas and Louisiana Crime Victims' Rights and Confidentiality Laws

Dear Judge Richard,

I am writing as **Ms. Shunte Jones-King**, a protected crime victim under the State of Texas Attorney General's Office, with ongoing investigations in both Texas and Louisiana related to the violent assault I suffered. It is not with pride that I admit I was the victim of a violent assault by three different men who assaulted, shot me, and left me on the side of the road to die. This was after a Ku Klux Klan march and rally in the areas nearby and I was assaulted by multiple men violently which now has me listed as a protected crime victim with the Texas State Attorney General (case provided attached can provide more information if interviewed in private and all my records and statements be protected in your courts and not to be accessed by public record. Due to the continued threats and the extreme nature of the crime, I respectfully request the Court seal all records, testimony, and identifying information pertaining to my case. This request is made to ensure my safety, as well as the safety of those close to me, as provided for under Texas and Louisiana Crime Victims' Rights and related confidentiality laws.

Confidentiality and Victims' Rights Under Texas and Louisiana Law

Under **Texas Code of Criminal Procedure, Article 56** and **Louisiana Crime Victims Reparations Act (La. R.S. 46:1801 et seq.)**, I am entitled to the following rights and protections as a crime victim:

1. **Confidentiality of Personal Information**
    - **Texas Code of Criminal Procedure, Article 56.82** provides for confidentiality through the **Address Confidentiality Program (ACP)**, which protects the residential address of victims of family violence, sexual assault, human trafficking, and stalking.

    - **Louisiana Code of Criminal Procedure, Article 322** and **Article 325** provide confidentiality measures for victims in similar circumstances, with special protections to ensure the victim's safety by keeping personal identifiers private.
2. **Protection from Further Harm and Threats**
    - Texas **Article 56.02** grants victims the right to be reasonably protected from the accused throughout the criminal justice process. Louisiana similarly acknowledges this right under **La. R.S. 46:1844**, which mandates that all state law enforcement and judicial systems take every possible precaution to avoid public exposure of a victim's personal information.
3. **Sealing of Sensitive Evidence and Documents**
    - **Texas Code of Criminal Procedure, Article 56.45** and **Louisiana Code of Evidence, Article 412** both provide for the sealing of sensitive records in cases involving violent crime and sexual assault. This includes testimony, medical records, and documentation that contain sensitive information about physical injuries or mental trauma suffered by the victim.
4. **Privacy in Court Proceedings and Communications**
    - Texas law further protects victims by allowing them to **consult with the prosecutor** regarding the type of evidence shared with the defense, and by securing privacy of photos, medical records, and other documents that could compromise the victim's safety.
    - Louisiana law offers equivalent protections under **La. R.S. 46:1842** and **La. C.Cr.P. Art. 325**, ensuring that victims of violent crimes are treated with fairness and respect throughout judicial processes and are protected from any unnecessary exposure that could lead to further harm.
5. **Participation in the Address Confidentiality Program (ACP)**
    - I am an active participant in the ACP, as administered by the Texas Attorney General's Crime Victims Services Division. Under this program, I am permitted to utilize an official substitute address (P.O. Box 12198, c/o L. Shunte Jones, Austin, TX 78711-2198) to keep my actual residential address confidential.

Request for Specific Protections in Court Proceedings

To safeguard my rights under Texas and Louisiana law, I respectfully request that the Court:

1. **Seal all identifying information** about me, including personal details, addresses, and any location-specific information in records or testimony.
2. **Protect sensitive records**, such as medical reports, photos, and personal testimonies, under seal or permit them only for in-camera review by the Court and involved parties to prevent public disclosure.
3. **Restrict public access** to case-related documents and information to ensure the safety of myself and others in my immediate environment.
4. **Apply privacy measures to all communications** about my case in line with Texas Code of Criminal Procedure and Louisiana Crime Victims' Rights laws to prevent unnecessary exposure of my identity.

Additional Confidentiality Protections for Victims of Violent Crimes

Given the sensitive nature of this case and the continued threat to my safety, I request that the following rights be respected under Texas Code of Criminal Procedure and Louisiana Crime Victims' laws:

- **Non-disclosure of injury details**: Any confidential victim report sections discussing specific injuries or bodily harm inflicted during the crime should be redacted to protect my safety.
- **Access limitations**: The Court should limit public access to my statements, allowing only authorized personnel to view sensitive details related to this case.
- **Notification of proceedings and defendant's status**: Both Texas and Louisiana law grant victims the right to be informed of all court proceedings, as well as parole or release status of the defendant. I request that such information be provided to me confidentially.

Conclusion

Thank you for your attention to these requests. I trust the Court will ensure that my rights under Texas and Louisiana confidentiality laws are upheld, so I may proceed through this process with the protections guaranteed to victims of violent crimes. Your assistance in applying these safeguards is greatly appreciated.

Respectfully,

Mrs. Shunte Jones-King

Enclosure: Confidential Victim Report (with sections redacted for privacy and safety reasons)

November 14, 2024

Schrumpf Law Office

A Professional Law Corporation
3801 Maplewood Drive
Sulphur, Louisiana 70663

Oliver "Jackson" Schrumpf*
Stacy D. Saltzman†

(337) 625-9077
Fax: (337) 625-8231

* Licensed in LA and TEXAS
† Licensed in LA and MISSISSIPPI

November 22, 2024

VIA EMAIL: ron@lccitycourt.org and mabshire@lccitycourt.onmicrosoft.com

Honorable Judge Ron Richard
Lake Charles City Court
118 W. Mill Street
Lake Charles, LA 70601

Re: John Clifford J King
Vs. 2023-2124
Renee Amos, Notary Public
Notary ID #29374
Lake Charles City Court

Dear Judge Richard,

Please be advised that I do not represent Shunte King in the contempt of court proceeding. Attempted service on me for the contempt proceeding is not effective.

Respectfully,

Oliver Schrumpf

Oliver "Jackson" Schrumpf

OJS/jm

Re: Motion to Continue has been denied. Trial is November 14, 2024

1 message

True King <truekingfile@gmail.com> Fri, Nov 8, 2024 at 7:24 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>
Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>, Dawn Brown <dbrown@schrumpf-law.com>, Taye King <kingshunte@gmail.com>

GM
Thank you for enrolling Mr Schrumpf Ms Jinnifer was right when she said you are an actual litigator who knows and practices the law and Im grateful.
My wifes name is Shunte King, she is attached to this email as Kingshunte@gmail.com the household accounts we use are in her name.

My wife will be coming on Wednesday in person to defend me. If I have to be rolled in with medical assistance Im doing everything in my power to come but Im going to be clear Im going to be in excruciating pain and unable to walk unassisted or stand unassisted but I will have to add this to my damages as without us there in person the evidence will not hold. That s what theyre tring to achieve and attempting to scare my wife away from testifying but she will stand by me so that this abuse ends. Weve been living in hell for 4,5 years nonstop and the covering up and bullying has to stop.

After prayer and discussion my wife and brother will be showing up as witnesses as well as my brother but please dont tell Judge Richard she is coming because she was submitted as a witness during discovery. After reviewing this email and proving our innocence I can also show you confidential emails between attorneys that highlight that ex parte communication is happening and that unfortunately Judge Richards claims are identical to what is evidenced in writing. I only ask that you do not share the names of the attorneys supplying the information as one of them went too far in writing and told everything and we dont even know what to do with evidence that is this bold. I would prefer to attach it without your assistants and allow you to decide whether to share it.
I am innocent. My wife is innocent. We have the emails to prove it. But are not sure we want to provide proof against people who are acting unethically for fear of retaliation.

Every word of the petitions are true and the bullying has occurred in writing Judge Richard just doesnt know we have the evidence.

Click the attachment for all of the information to the actual "imposter" who is practicing law Im pretty sure it will be amusing to see the truth.
See attached

On Thu, Nov 7, 2024 at 6:12 PM True King <truekingfile@gmail.com> wrote:
>
> Mr Schrumpf,
>
> As you can tell from the evidence no one is practicing law. When a plaintiff doesn’t have money their own motions must be filed.
>
> When those motions aren’t filed they punish you.
>

> This case was reset multiple times due to opposing counsel.
>
> Additionally Shunte King is NOT a resident of Louisiana and cannot practice law.
>
> These claims would need to be supported by evidence . Someone in the clerks office is friends with Renee Amos.
> As you can tell by the motions an effort was made to screw John king over with tricks . None of this has anything to do with the case except when someone is ill their caretaker must respond.
>
> Per the medical report John King Sr is suffering from cognitive dysfunction and they were attempting to force him to board a plane on a torn spinal cord or have default sanctions. Therefore motions had to be filed.
>
> They can make allegations but freelance.com receipts of paralegal preparation say otherwise as well as numerous other attorneys who have in writing said the clerk and the judge's paralegal have threatened multiple times.
>
> Mr Schrumpf we were told you were experienced and cannot be told about the law because you know the law. The evidence in this case shows efforts to "free" Ms Amos from liability than indemnifying John King.
>
> Additionally it is prejudicial for them to assume if one spouse is educated they wouldn't proof read documents for the other who struggles.
>
> What's the real underlying issue because that's what we're trying to show you.
>
> Please advise opportunity to get on a call.
>
> Thank You
>
>
>
>
> On Thu, Nov 7, 2024 at 5:58 PM Oliver Schrumpf <oschrumpf@schrumpf-law.com> wrote:
>>
>> I just got back from about a two hour hearing. Judge Ron Richard had counsel for both parties come to court about 1:30 today. He signed my motion to enroll as counsel, but before taking up the motion to continue, he insisted on reading through multiple e-mails, motions, and requests, and complaints which he believes were written by Mrs. King (Shaunte King) and e-mailed from truekingfile@gmail.com
>>
>>
>>
>> Judge Richard said he will consider allowing Mr. King to testify via ZOOM ONLY IF THE COURT RECEIVES A LETTER SIGNED BY A PHYSICIAN BY MONDAY NOVEMBER 11 (A COURT HOLIDAY) SO WE SHOULD TRY TO GET IT TOMORROW IF POSSIBLE) THE LETTER FROM THE PHYSICIAN NEEDS TO SAY THAT HE IS TREATING MR. JOHN C. KING, WHAT MR.KING'S CONDITION IS, AND THAT MR. KING IS PROHIBITED FROM TRAVELLING BECAUSE OF SEVERE RISK OF PERMANENT INJURY (OR WHATEVER OTHER REASON THE DOCTOR HAS FOR PROHIBITING TRAVEL FROM NEW JERSEY TO LOUISIANA). IT MUST BE SIGNED BY THE DOCTOR AND DATED. OTHERWISE, IF MR. KING DOES NOT APPEAR IN COURT NOVEMBER 14, 2024, THE TRIAL (WHICH HAS BEEN SET FOUR TIMES) WILL GO FORWARD.
>>
>>
>>
>>
>>
>> Also, the judge believes that Shaunte King has violated La. R.S. 37:212 (Practicing Law without a license):
>>
>> La. R.S. §212. "Practice of law" defined
>>
>> A. The practice of law means and includes:
>>
>> (1) In a representative capacity, the appearance as an advocate, or the drawing of papers, pleadings or documents, or the performance of any act in connection with pending or prospective proceedings before any court of record in this state; or
>>
>> (2) For a consideration, reward, or pecuniary benefit, present or anticipated, direct or indirect;
>>
>> (a) The advising or counseling of another as to secular law;
>>

>> (b) In behalf of another, the drawing or procuring, or the assisting in the drawing or procuring of a paper, document, or instrument affecting or relating to secular rights;
>>
>> (c) The doing of any act, in behalf of another, tending to obtain or secure for the other the prevention or the redress of a wrong or the enforcement or establishment of a right; or
>>
>> (d) Certifying or giving opinions, or rendering a title opinion as a basis of any title insurance report or title insurance policy as provided in R.S. 22:512(17), as it relates to title to immovable property or any interest therein or as to the rank or priority or validity of a lien, privilege or mortgage as well as the preparation of acts of sale, mortgages, credit sales or any acts or other documents passing titles to or encumbering immovable property.
>>
>> B. Nothing in this Section prohibits any person from attending to and caring for his own business, claims, or demands; or from preparing abstracts of title; or from insuring titles to property, movable or immovable, or an interest therein, or a privilege and encumbrance thereon, but every title insurance contract relating to immovable property must be based upon the certification or opinion of a licensed Louisiana attorney authorized to engage in the practice of law. Nothing in this Section prohibits any person from performing, as a notary public, any act necessary or incidental to the exercise of the powers and functions of the office of notary public, as those powers are delineated in Louisiana Revised Statutes of 1950, Title 35, Section 1, et seq.
>>
>> C. Nothing in this Section shall prohibit any partnership, corporation, or other legal entity from asserting or defending any claim, not exceeding five thousand dollars, on its own behalf in the courts of limited jurisdiction or on its own behalf through a duly authorized partner, shareholder, officer, employee, or duly authorized agent or representative. No partnership, corporation, or other entity may assert any claim on behalf of another entity or any claim assigned to it.
>>
>> D. Nothing in Article V, Section 24, of the Constitution of Louisiana or this Section shall prohibit justices or judges from performing all acts necessary or incumbent to the authorized exercise of duties as judge advocates or legal officers.
>>
>> Amended by Acts 1976, No. 515, §1; Acts 1980, No. 161, §1; Acts 1981, No. 535, §1; Acts 1985, No. 783, §1; Acts 1989, No. 22, §1, eff. June 14, 1989; Acts 1992, No. 673, §1; Acts 2010, No. 24, §1; Acts 2011, No. 325, §2, eff. Jan. 1, 2012.
>>
>>
>>
>> As a result of this, Judge Richard ordered that Shaunte King appear in his Court November 14, 2024 at 9:00 AM. I advised the Court that I represent John C. King, not Mrs. King, but he said Shaunte King has been filing papers in this court and acting as an attorney and she must appear in person or he will hold her in contempt and may refer the case to the District Attorney for prosecution.
>>
>>
>>
>>
>>
>> ALSO, Judge Richard read into the record numerous documents from truekingfile@gmail.com asserting unethical and criminal conduct by Judge Richard and/or his staff members. He intends to have you defend a contempt of Court charge.
>>
>>
>>
>> Again, I advised the Court that I was retained only to represent John C. King on the claim for the Notary bond and I do not represent Shaunte King.
>>
>>
>>
>> 1. Please attempt to get the treating physician to execute a letter SIGNED BY A PHYSICIAN BY MONDAY NOVEMBER 11 (A court holiday- so we should try to get it tomorrow if possible) THE LETTER FROM THE PHYSICIAN NEEDS TO SAY THAT HE IS TREATING MR. JOHN C. KING, WHAT MR.KING'S CONDITION IS, AND THAT MR. KING IS PROHIBITED FROM TRAVELLING from New Jersey to Louisiana until (Date) BECAUSE OF SEVERE RISK OF PERMANENT INJURY (OR WHATEVER OTHER REASON THE DOCTOR HAS FOR PROHIBITING TRAVEL FROM NEW JERSEY TO LOUISIANA). IT MUST BE SIGNED BY THE DOCTOR AND DATED. IT MUST BE RECEIVED BY ME SO I CAN GET IT TO THE JUDGE FIRST THING TUESDAY MORNING.
>>
>> 2. Please advise if Shaunte King will plan to be here Thursday November 14 for trial.
>>
>> 3. Please advise what accommodations you have to testify via ZOOM if we can get the doctor's letter in time.
>>

>>
>>
>> Oliver “Jackson” Schrumpf
>>
>> Schrumpf Law Office (PLC)
>>
>> 3801 Maplewood Drive
>>
>> Sulphur, LA 70663
>>
>> Phone: 337-625-9077
>>
>> Fax: 337-625-8231
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>> oschrumpf@schrumpf-law.com
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Chat GPTDocumentation and Paralegal.pdf
4121K

Case # 23-2124
King Vs Amos Hartford

Exhibits to accompany judicial filings
Please refer to case law in motions

EXHIBITS 1: DENIAL OF RIGHT TO FAIR COUNSEL IN JUDICIAL PROCEEDINGS KAMIE DOMINIC MOTIONS ALLOWED TO CIRCUMVENT DUE PROCESS TO DISCOURAGE ENROLLMENT BY QUALIFIED COUNSEL IN TIME AS HER MOTIONS WERE NOT FILED AND SERVED SAME DAY MOTION TO QUASH AND STRIKE WAS FILED BUT NO STATUS CONFERENCE ABOUT THE CONCERNS

Correspondence from 4 of 7 Attorneys, 6 in total have had contact with the Clerk's office but when Shunte King POA / spouse John King Sr Spoke with Ms Monica Abshire on Monday Nov 4, 2024 after the legal holiday on Friday Nov 1 Ms Abshire told Shunte King that the clerk's office had had zero contact with any attorneys about the nature of the case of Judge Richards mood concerning the case but attached are 4 different Louisiana attorneys correspondence all stating the same sentiment and one attorney whose correspondence has not been provided for fear of retribution by Judge Richard it is emphasized that Judge Redd STRONGLY wants Renee Amos not to suffer damages of any sort as ‘she does not have a pot to piss in”; and there have been off record ex parte communications coming from the someone in the clerk's office who another attorney in writing has warned to get an attorney because the case appears to be heavily biased and there is resistance to cooperation within the clerk's office. In an urgent conversation with Ms Bash Judge Richards paralegal she asked Shunte King “are you implying that the clerk's office is dissuading counsel from enrolling on your case and that ex parte communication is taking place” ? When Shunte King responded “No I'm simply relying what the attorneys are saying . Ms Bash then said “I don't believe that at all King has had plenty of time to enroll counsel” then Shunte King told bash there was evidence of multiple attorneys complaining that the clerk's office was creating hurdles to enrollment by saying it would be a long time to send the case file then offering personal expressions on behalf of Judge Redds mood and sentiment. This would be a violation of King civil rights, and any order placing King in medical danger once Richard is made aware there would be grounds for medical injunction by the state of new jersey to prevent orders to move an unreleased patient out of state documented with heightened risk for stroke, permanent paralysis or death from seizure as documented in the hospital inpatient records King currently suffers from seizures as a result of a fall and is experiencing rehabilitation treatments daily until November 13 2024 to coerce spinal cord back into spinal cavity. The extent of the disease's damage was reassessed Nov 5 and MRI results have not come back. The plaintiff is proceeding assuming that Judge Richard will intervene to stop this once the Judge is aware.

23-2124 John C. J. King Sr. vs. Renee Amos

Monica Abshire <mabshire@lccitycourt.onmicrosoft.com> Tue, Aug 13, 10:48 AM
to me

Good Morning Mr. King –

This is to inform you Judge Richard has granted your Pauper Affidavit.
You will be allowed from this date, August 13, 2024 to file in Pauper status, waiving any deposits required, but not relieving you of costs.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

True King <truekingfile@gmail.com> Wed, Oct 23, 12:22 PM
to shantell, Monica, bcc: me, bcc: Tyria

Monica
Thank you for the update.

Attached is Shantell from our attorneys office.
We're in need of some things that are not clear and hope that you could help Shantell.

Shantell,
This is Ms Abshire the Lake Charles City Court Clerk. She may be able to answer your questions.

Whitney Triplet <whitney@rouzanlaw.com> Thu, Aug 1, 4:06 PM
to me

Good afternoon,

I've finally made it back into the office, and I looked again through what you've sent. The car case is missing documentation of orders that you told me exist. Specifically, the motion to reconsider that she filed should have a signed judgment issued by the judge, and I don't know what else may be out there that she has secretly filed.

In order to proceed at a by the hour billing, this firm requires a $10,000 retainer that my boss requires to be paid prior to any work that is not on a contingency.

Again, I really would like to take this on for you; but there is too much information and background things that have happened that are unknown to me. Once you are able to gather and confirm all pleadings and judgments that have been filed and stamped by the clerk, then we can revisit this. In the meantime, if you decide to handle this pro se, (and this is my personal opinion, not legal advice) your next step may want to be to deliver to the opposing counsel some interrogatories where you are asking specific questions about the incident. You should send them to Ms. Amos through her attorney. You could copy the format of the questions she sent you. Be very specific with your questions. Also make sure to send some to the insurance so they see you are serious about pursuing this.

At this time, that is the most that I can do to assist you. There are just too many gaps in the information available to me.

Whitney Simone Triplet
Attorney at Law
Don A. Rouzan & Associates, L.L.C.
Mailing Address:
P.O. Box 871687
New Orleans, LA 70187-1687
Physical Address:

-

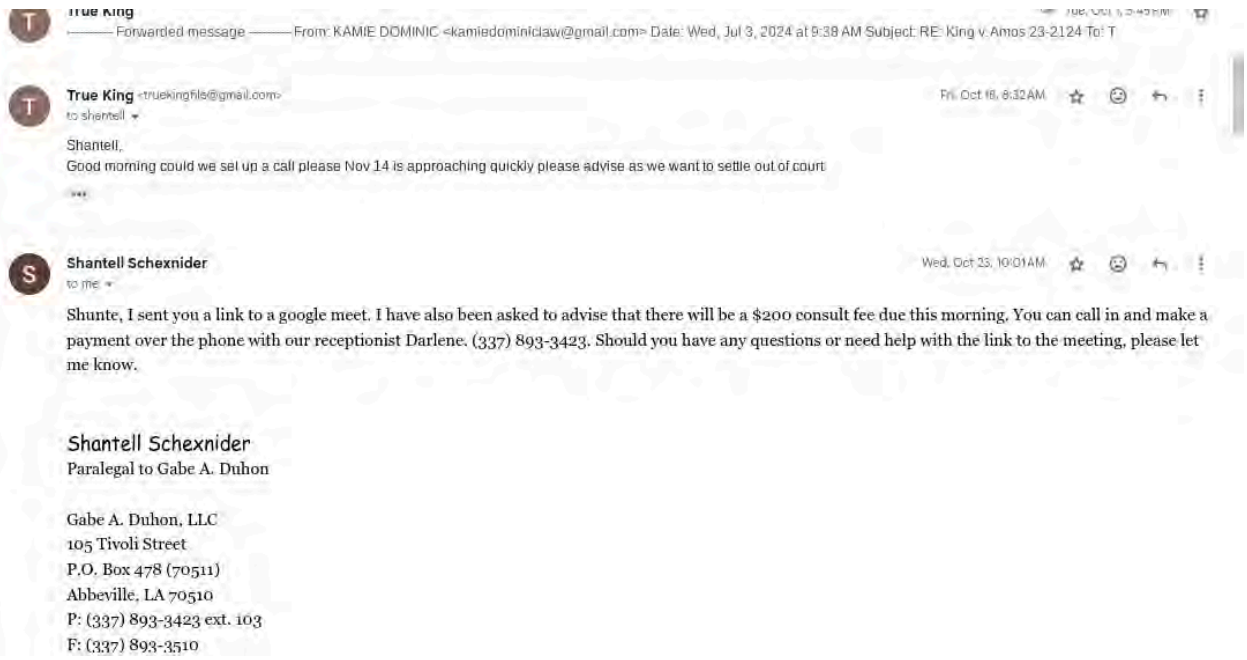
**

True King Oct 23, 2024, 10:28 AM
Hello Shantel,Where is the link I just saw this email.

Shantell Schexnider Oct 23, 2024, 10:30 AM
https://meet.google.com/kau-eoqx-hyb From: True King <truekingfile@gmail.com> Sent: Wednesday, October 23, 2024 2:28 PM To: Shantell Schexnider <shantell@vermil

True King <truekingfile@gmail.com> Oct 23, 2024, 10:33 AM
to Shantell

**



True King
---------- Forwarded message ---------- From: KAMIE DOMINIC <kamiedominiclaw@gmail.com> Date: Wed, Jul 3, 2024 at 9:38 AM Subject: RE: King v. Amos 23-2124 To: T

True King <truekingfile@gmail.com> Fri, Oct 18, 8:32 AM
to shantell

Shantell,
Good morning could we set up a call please Nov 14 is approaching quickly please advise as we want to settle out of court

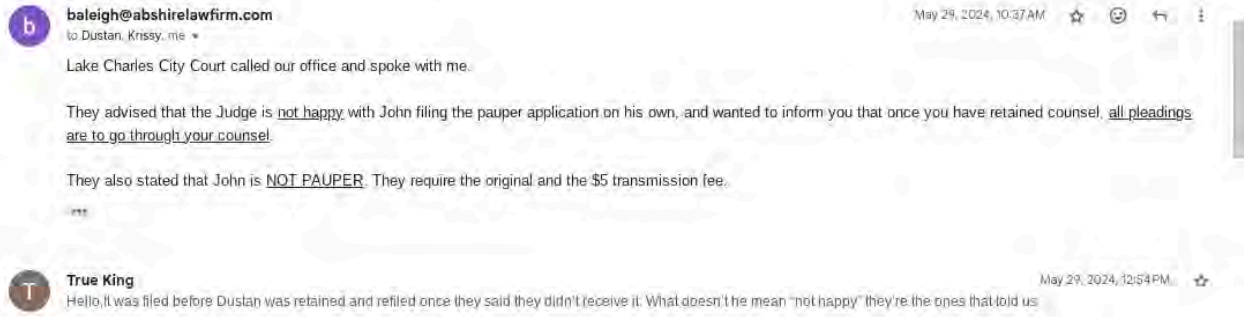
Shantell Schexnider Wed, Oct 23, 10:01 AM
to me

Shunte, I sent you a link to a google meet. I have also been asked to advise that there will be a $200 consult fee due this morning. You can call in and make a payment over the phone with our receptionist Darlene. (337) 893-3423. Should you have any questions or need help with the link to the meeting, please let me know.

Shantell Schexnider
Paralegal to Gabe A. Duhon

Gabe A. Duhon, LLC
105 Tivoli Street
P.O. Box 478 (70511)
Abbeville, LA 70510
P: (337) 893-3423 ext. 103
F: (337) 893-3510

**



baleigh@abshirelawfirm.com May 29, 2024, 10:37 AM
to Dustan, Krissy, me

Lake Charles City Court called our office and spoke with me.

They advised that the Judge is not happy with John filing the pauper application on his own, and wanted to inform you that once you have retained counsel, all pleadings are to go through your counsel.

They also stated that John is NOT PAUPER. They require the original and the $5 transmission fee.

True King May 29, 2024, 12:54 PM
Hello,It was filed before Dustan was retained and refiled once they said they didn't receive it. What doesn't he mean "not happy" they're the ones that told us

***



Joseph Burke Nov 1, 2024, 11:22 AM (5 days ago)
to me, Chelsea, Hannah

Mrs. King,

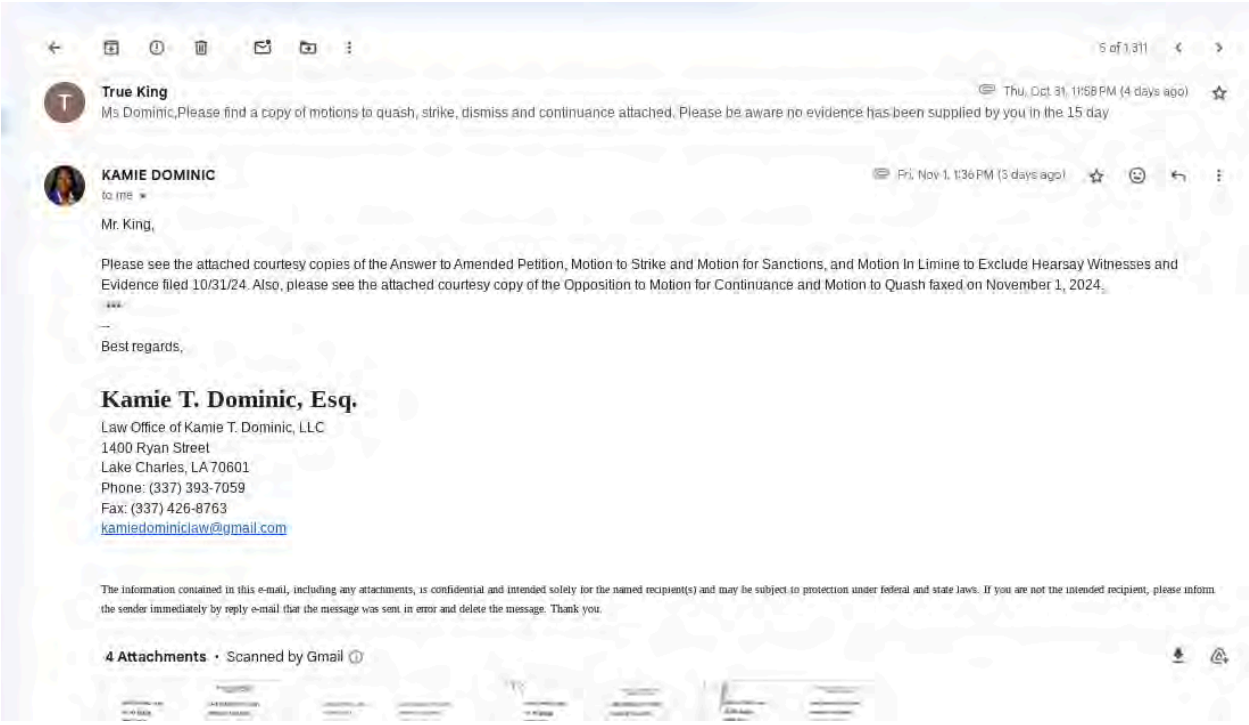
I was simply relaying the docket information provided to me from the court's clerk. I do now know what the subject of the motion or sanctions is.

Thanks,

Joe
Sent from my iPhone

> On Oct 31, 2024, at 1:14 PM, True King <truekingfile@gmail.com> wrote:

***



5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.
Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail

*** Medical Exhibits sent to Judge Richard and Kamie Dominic on Monday Nov 4, 2024 with request to be sealed.***

EXHIBITS SECTION #2 HARASSMENT OF COLSTON AND HER ATTORNEY ATTEMPTS AT UNETHICAL INVOLVEMENT IN COURT PROCEEDINGS AND UNDOCUMENTED ATTENDANCE AT CLOSED COURT HEARING FOR CASE #23-2124

Mail weekly sent to my mothers house. She goes to the post office and mails things to keep my mother and grandmother sick.
Charmaine does not recognize this behavior as insane or inappropriate seeing as though my wife has never met my children and has never even had a conversation with charmaine. This is years later after stealing the car and she does this and brags that there won't be justice for me or a punishment for her.

This is sick. This isn't a paramour, this is a mentally disturbed individual and Ms Dominic should remain ethical when dealing with victims. I hadn't seen Charmaine colston in person in 13 months at the time of car theft so how is that a paramour? I was married and living with my wife. It's more lies this is the harassment contributing to my seizures and paralysis and to discriminate against my gender is unethical and slander.



lies

Tyria's comment on your post

Tyria Guillory
I don't agree with him on make it work that is not good for a women or man that only wants control and not have a relationship for the kids. My nephew stayed with his kids mother regardless to the mental and physical abuse that he was hiding from his family. She cut him, burned him, she it him in the head with an object that left him with seizures. you have to do what is best for you, especially i... See more

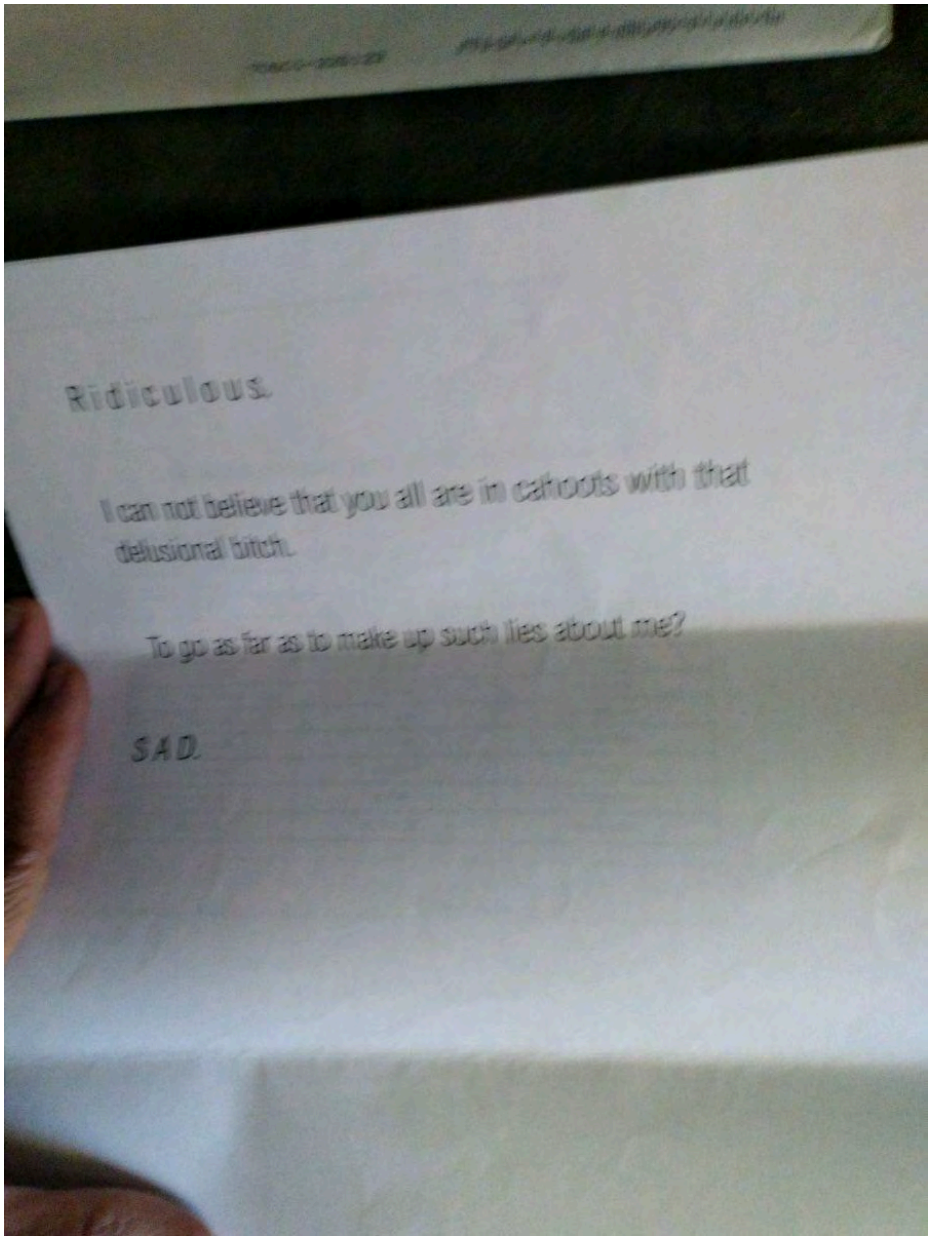
7h Like Reply 1

King Tay
Tyria Guillory I would settle for just keeping my photos, name, my likeness , my husbands god baby photos, shoot just don't post anyone that isn't posting you.

Or you will be subpoenaed to court if you deal with them and lose money off work...
-OR you will be accused of harassment. She gonna initiate every text, email, and mail stuff to your house "good morning ALL", as if you got a wedding ring t... See more

33m Like Reply


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123

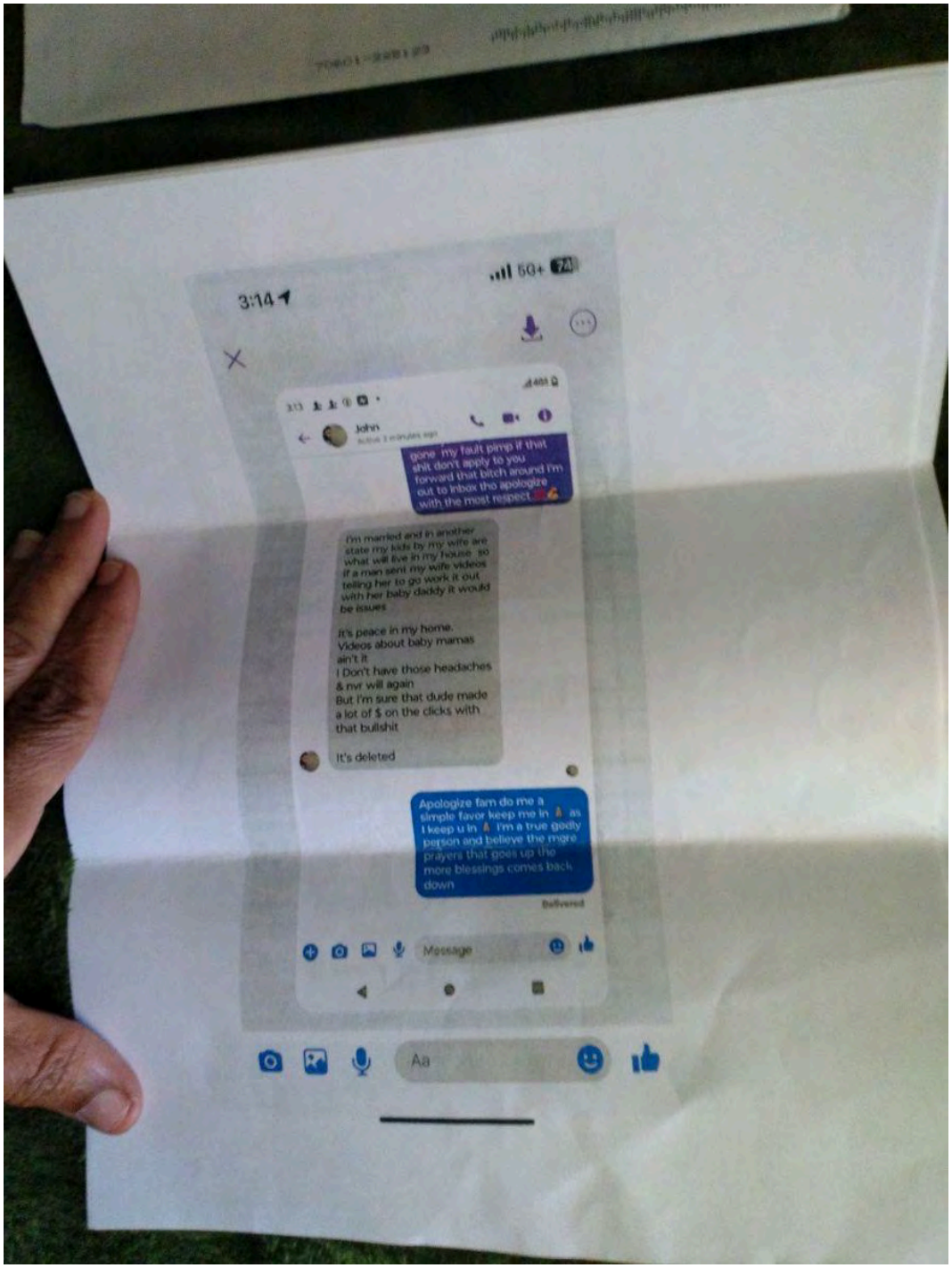


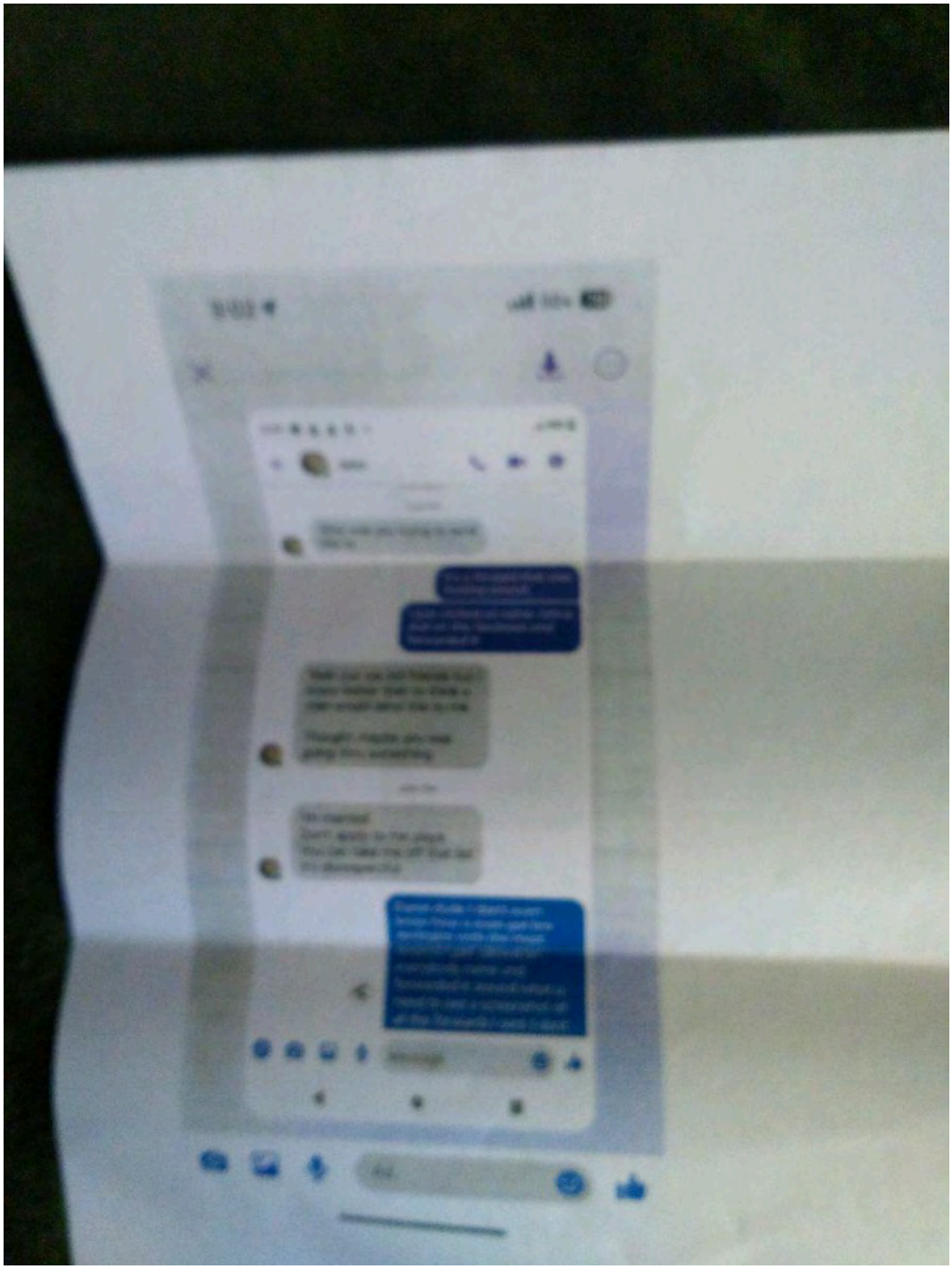
Ridiculous.

I can not believe that you all are in cahoots with that delusional bitch.

To go as far as to make up such lies about me?

SAD.

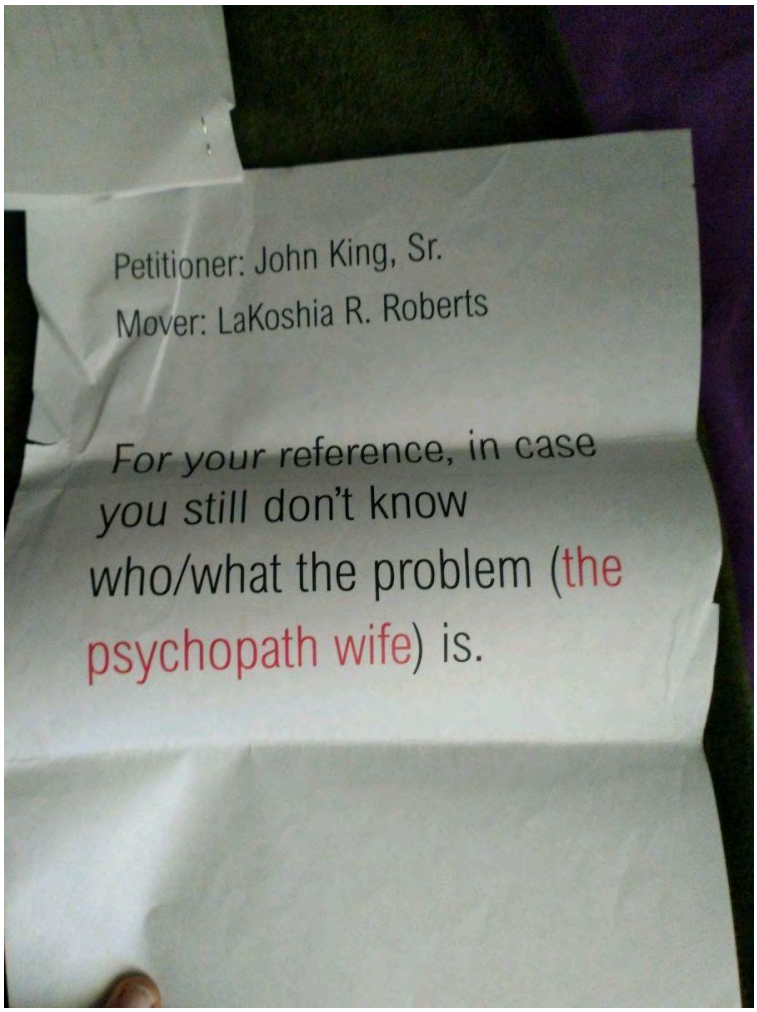

3:14
5G+
John
gone my fault pimp if that shit don't apply to you forward that bitch around I'm out to inbox tho apologize with the most respect
I'm married and in another state my kids by my wife are what will live in my house so if a man sent my wife videos telling her to go work it out with her baby daddy it would be issues
It's peace in my home. Videos about baby mamas ain't it
I Don't have those headaches & nvr will again
But I'm sure that dude made a lot of $ on the clicks with that bullshit
It's deleted
Apologize fam do me a simple favor keep me in 🙏 as I keep u in 🙏 I'm a true godly person and believe the more prayers that goes up the more blessings comes back down
Delivered
Message
Aa




King
921 Moss St.
Lake Charles, La 70601
BATON ROUGE LA 707
19 JUL 2024 PM 1 L
FREEDOM
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123


King
821 Moss St.
Lake Charles, LA 70601
BATON ROUGE LA 707
7 AUG 2024 PM 3 L
FREEDOM
Monica King Guillory
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123




Petitioner: John King, Sr.
Mover: LaKoshia R. Roberts
For your reference, in case you still don't know who/what the problem (the psychopath wife) is.


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave
Lake Charles, La 70601
70601-225123

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

***Amended to include evidence of grounds for Judicial Intervention due to what appears to be efforts of judicial bias that may be known to Judge Richard. There have been repeated efforts to intimidate existing counsels, and dissuade new counsel from enrolling into the case by means of ex parte communications. Efforts to deny rights to legal counsel, documented multiple attorneys have attempted to enroll and have been dissuaded by the clerk's office with misleading rhetoric. Special privileges such as the attendance of Orelia Lawdins - Trent legal counsel for Charmaine Y. Colston whom I am a registered domestic violence victim and continue to suffer harassment and stalking examples of this are seen in the Court Records for case #23-2124 as Charmaine Y Colstons attorney said she could not be served as she was not party to the case however the documents she requested by conformed copy mailed to her are in fact grounds for adequate service as Charmaine Colston herself requested the documents. Her then attorney was allowed to attend closed proceedings for the trial on May 21, 2024 prior to a non related family court trial on May 25, 2024 and her presence was inaccurately not recorded into the record as required by law as all non interested parties were asked to be removed from the courtroom and she was not enrolled as council nor was she a witness and this violation was permitted .

Clerk's office denies ever speaking to any attorneys but their efforts to enroll have happened repeatedly since July and they were told Judge Richard is unhappy (refer to evidence and exhibit attached) please refer to documented emails and subpoenas that show at least 5 separate attorneys were either intimidated, told misinformation, told information with intent to dissuade enrollment. There is also the disregard of the untimely filed motions of Kamie Dominic on Oct 31, 2024 where she was required by law to serve concurrently upon both Judge Richard and the plaintiff John King Sr her motions and arguments and she did not. Counsel was allowed to make defamatory lies of infidelity in Kings marriage claiming involvement of a paramour where no such paramour exists. Refer to Louisiana legal definition of paramour, (current sexual / romantic nature person of interest or mistress) how can this be when King was cohabitating with spouse and married at the time the negligence and fraud by Amos occurred ? Additionally all ex girlfriends cannot be considered paramours and Colston is not the immediate preceding romantic partner prior to Kings spouse. If there was a paramour by legal definition it would apply to any persons of romantic nature prior to current spouse, and post any involvement with

on/ off again relationship with ex girlfriend Charmaine Y Colston. In addition Ms Dominic leaves room for misinterpretation as she makes a salacious claim of paramour without any relevance to the case. She screams that Amos' reputation deserves consideration yet it is unethical and she has no evidence of any paramour as King had not seen Colston in person for 13 months prior to transfer of his vehicle illegally. Im asking that this line of Kamie Dominic petition be stricken from the record as it creates risk for King in future legal proceedings that either his current wife, or ex girlfriend can use Dominics petition as proof of an existing Paramour during the marriage and depending on state in which possible divorce proceedings could be filed this could have detrimental financial damaging effects to King.

Lastly and most importantly after reviewing this case with hospital attorney, and the policy of SW Airlines, United Airlines, TSA, Port Authority and the laws of HIPAA and the additional medical procedural protections allowed by the state of New Jersey to seek legal injunction and or restraining order if evidence of violation of civil rights exists or any order by an out of state judge poses immediate threat to patients life or standard of care. Judge Richards inability to consider zoom appearance on an immobile plaintiff who cannot meet clearance standards to fly prior to November 13, 2024 as right now a no fly order is in place for John King due to spinal cord swelling resulting in temporary paralysis and seizure. The request by Judge Richard to appear only in person less than 24 hours after admission for follow up care as documented in the patient chart is not only unreasonable but unconstitutional and deadly. No reasons have been provided as to why Kamie Dominic had 6 months to file her motions timely and she did not file within the 15 day window and did not file concurrently as required by law. As a result this intruded on my right to legal counsel. She also served me on November 1 a legal holiday and I have 7 days from that date to have a motion for continuance received by the clerk's office and Tracking number says the wet signature motions were received timely as Nov 1 was a legal holiday in the state of Louisiana.

Additionally, on November 6, 2024 repeated efforts to reach Lake Charles City Court were prevented as the fax and phone lines were down per Dominic, Bash and my wife Shunte King made repeated attempts to contact and was denied on dates of deadline. Additionally this happened on Oct 31, 2024 and I had to send evidence to Monica Abshire via email to be time stamped in time with exhibits and this was not permitted as Monica Abshire claims she could not see attachments to the notarized petition.

At this time and the lack of a status conference or any audio or court transcripts from prior proceedings how can Plaintiff defend the untimely motions presented by Kamie Dominic as all of the evidence points to some sort of bias in the proceedings as “Renee doesn't have a pot to piss in” has taken priority of the life and civil rights of plaintiff John King and requires the intervention of Judge Richard to stop the influences coming from the clerks office as more than one attorney has sent email complaints of clerks office unwillingness to send case file information, unwillingness to act in a timely fashion, and an eager willingness to share Judge Richard position and emotion towards case # 23-2124 which would be grounds for mistrial with the addition of Orelia Lawdins - Trents presence in the court room being left out of the minutes for a

closed hearing as well as Charmaine Colston by order of conformed copy received appropriate service from the clerk's office.

Dear Honorable Judge Richard,
After repeated denials of due process, and several attempts to deny a fair and balanced trial, and repeated ex parte communications, lack of service, and overall what appears to be an effort to provide Renee Amos with a documented unfair judicial advantage it is now necessary to file evidence and petition ito the record for case number #23-2124 and to serve in proceedings for medical intervention protections for grounds for appeal and for out of state judicial proceedings including but not limited medical injunctions to prevent ordered removal from the States of New York and New Jersey for which NJ/NY Port Authority, TSA, and state transportation guidelines for disabled transport are in place that prevent the transport of John C King Sr plaintiff for means of medical emergency.

Additionally as per the evidence attached opposing counsel is being granted liberties that are in violation of due process and Judge Richards own legal precedent that does not permit untimely served motions and evidence to be permitted unto the record. Please refer to

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant’s recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Tracking # 950551419404430963 00

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the "interest of justice" standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant's Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received

notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant’s claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant’s motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the ____ day of _____, 2024, at _____ o'clock AM, Lake Charles, Louisiana.

_____
signature

Case # 23-2124 King Vs Amos The Hartford 11/6/2024
Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

STATE OF LOUISIANA
PARISH OF CALCASIEU

BEFORE ME, the undersigned Notary Public, personally appeared **John CJ King Sr.**, who, after being duly sworn, did depose and say:

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical

_____

Emergency Complaint Against Judge Ron Richard, Lake Charles City Court

12 messages

True King <truekingfile@gmail.com> Mon, Feb 17, 2025 at 12:23 PM
To: True King <truekingfile@gmail.com>
Bcc: osc@lasc.org, stephen.street@la.gov, joe.lotwick@la.gov, alisa.jones@la.gov

John C. J. King

123 N. Louisiana Avenue

Lake Charles, LA, 70615

Truekingfile@gmail.com

318-995-6021

01-05-25

Judicial Commission of Louisiana

RETURN THIS FORM TO:

The Judiciary Commission of Louisiana

Office of Special Counsel

601 St. Charles Avenue

New Orleans, Louisiana 70130

osc@lasc.org

Subject: Judicial Complaint Against Judge Ron Richard

Lake Charles City Court Judge

118 W Mill St, Lake Charles, LA 70601

To Whom It May Concern,

I am submitting this formal complaint against the Honorable Judge Ron Richard of the City Court of Lake Charles, Louisiana, regarding conduct in Case No. 23-2124 (King v. Amos, The Hartford). This complaint

arises from repeated incidents of judicial misconduct, bias, procedural irregularities, and actions that have resulted in severe harm to me and my family.

1. Basis for Complaint

Judge Richard has demonstrated persistent bias and unfair treatment throughout the proceedings, including:

• Judicial Bias & Prejudice: Making inappropriate comments, engaging in retaliatory behavior, and allowing ex parte communications that compromised my legal representation.

• Violation of Due Process: Denying me adequate notice for hearings, allowing opposing counsel to submit untimely motions, and proceeding without ensuring my legal representation.

• Endangerment of a Protected Witness: Ignoring my medical condition, requiring in-person appearances despite physical immobility, and disregarding my warnings about threats to my spouse's safety, which ultimately resulted in a fatal incident.

• Procedural Misconduct: Improper courtroom procedures, misrepresentation by court clerks regarding counsel enrollment, and the use of fabricated addresses to harass my family.

2. Specific Incidents of Concern

1. Retaliatory Conduct: Judge Richard issued contempt charges against my spouse days after she sought medical treatment during a hearing, despite my seizure in court being ignored.

2. Ex Parte Communications & Intimidation: Legal counsel was dissuaded from representing me due to private discussions with the judge, violating ethical standards.

3. Unlawful Detention & Threats: My spouse was unlawfully detained in a sealed courtroom, denied restroom access, and threatened with incarceration despite not being on trial.

4. Failure to Act on Safety Warnings: I repeatedly warned the court that its negligence would lead to harm, which tragically resulted in a homicide directly tied to this case.

3. Request for Investigation & Action

Given these serious violations, I respectfully request the Judicial Commission to:

• Conduct a formal investigation into Judge Ron Richard's conduct in Case No. 23-2124.

• Review his actions for violations of judicial ethics, including bias, due process violations, and endangerment of a witness.

• Take appropriate disciplinary action to prevent further harm to litigants appearing before his court.

I have attached supporting documentation, including my motion to recuse Judge Richard, which outlines additional details. Please confirm receipt of this complaint and advise on any further steps necessary.

Sincerely,

John C. King Sr

123 N. Louisiana Avenue
Lake Charles La 70601
truekingfile@gmail.com

one Judicial complaint -King against Ron Richard.pdf
28K

Office of Special Counsel <osc@lasc.org> Wed, Feb 19, 2025 at 12:48 PM
To: True King <truekingfile@gmail.com>

Mr. King,

In your email below, you stated that:

”I have attached supporting documentation, including my motion to recuse Judge Richard, which outlines additional details.”

We did not receive any supporting documentations. Please forward any supporting information, you would like to include with your complaint.

Thanks,

The Judiciary Commission of Louisiana

Office of Special Counsel

601 St. Charles Avenue

New Orleans, LA 70130

Phone: (504) 568-8299

From: True King <truekingfile@gmail.com>
Sent: Monday, February 17, 2025 11:24 AM
To: True King <truekingfile@gmail.com>
Subject: Emergency Complaint Against Judge Ron Richard, Lake Charles City Court

EXTERNAL EMAIL: Please use caution as this email originated from an external source.

[Quoted text hidden]

True King <truekingfile@gmail.com> Wed, Feb 19, 2025 at 1:13 PM
To: Office of Special Counsel <osc@lasc.org>

Good morning it is being mailed in as the online instructions said no attachments.

Is this incorrect
[Quoted text hidden]

Office of Special Counsel <osc@lasc.org> Wed, Feb 19, 2025 at 1:43 PM
To: True King <truekingfile@gmail.com>

We do take attachments, but not over 20 pages. I will put a note on your file re documentation being mailed.

[Quoted text hidden]

Office of Special Counsel <osc@lasc.org> Wed, Feb 26, 2025 at 9:48 AM
To: True King <truekingfile@gmail.com>

Good morning Mr. King,

Just following up to check to see if you have mailed the additional documentations. We have not received it as of 2/25/2025.

Thanks,

The Judiciary Commission of Louisiana

Office of Special Counsel

601 St. Charles Avenue

New Orleans, LA 70130

Phone: (504) 568-8299

[Quoted text hidden]

True King <truekingfile@gmail.com> Wed, Feb 26, 2025 at 12:38 PM
To: Office of Special Counsel <osc@lasc.org>

Good afternoon yes it was mailed had to wait for all parties to be served and have confirmation of service for the lawsuit. My lawyer just finished providing remainder of the documentation and will arrive it's been taking about 7 days and they were served on this last Thursday.

Thank you for circling back
[Quoted text hidden]

Joe Lotwick <Joe.Lotwick@la.gov> Wed, Feb 26, 2025 at 3:11 PM
To: True King <truekingfile@gmail.com>

Mr. King,

The Office of State Inspector General has received your email in which you state a complaint against Lake Charles City Court Judge Ron Richard. OIG has no jurisdiction or authority to investigate judges as our jurisdiction is limited to the executive branch of state government. It appears that you may have also sent your complaint to the Judiciary Commission of Louisiana, Office of Special Counsel. I believe that is the proper office in which to lodge such a complaint.

Joe Lotwick

OIG General Counsel

From: True King <truekingfile@gmail.com>
Sent: Monday, February 17, 2025 11:24 AM
To: True King <truekingfile@gmail.com>
Subject: Emergency Complaint Against Judge Ron Richard, Lake Charles City Court

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

[Quoted text hidden]

True King <truekingfile@gmail.com> Thu, Feb 27, 2025 at 2:45 PM
To: Joe Lotwick <Joe.Lotwick@la.gov>

Mr lotwick
The evidence will show it involves several pieces and people that fall in your jurisdiction.

I contacted federal divisions and provided descriptions and was provided website with info as to instances where the inspector general office would be appropriate for this investigation.

Wouldn't it be appropriate to review the evidence to make sure this doesn't involve members from those branches as this involves more than one official

Also what do you mean it appears I also issued a complaint with special counsel?
[Quoted text hidden]

True King <truekingfile@gmail.com> Sun, Mar 16, 2025 at 6:10 PM
To: Tyria Guillory <msteetax@gmail.com>, John King <johncjking86@gmail.com>, kguillorymonica@gmail.com

This shows John never once read this cause he would simply change the judges names and change the complaints and be done.
---------- Forwarded message ---------
From: **True King** <truekingfile@gmail.com>
Date: Mon, Feb 17, 2025 at 12:23 PM
Subject: Emergency Complaint Against Judge Ron Richard, Lake Charles City Court
To: True King <truekingfile@gmail.com>
[Quoted text hidden]

---

one Judicial complaint -King against Ron Richard.pdf
28K

True King <truekingfile@gmail.com> Mon, May 19, 2025 at 10:04 AM

To: Office of Special Counsel <osc@lasc.org>

Hello I never received any correspondence in regards to my judicial review request may i please have an update?

[Quoted text hidden]

Office of Special Counsel <osc@lasc.org> Mon, May 19, 2025 at 10:58 AM
To: True King <truekingfile@gmail.com>

[Quoted text hidden]

John C.J. King 25-062.pdf
58K

True King <truekingfile@gmail.com> Mon, May 19, 2025 at 2:55 PM
To: Office of Special Counsel <osc@lasc.org>

Will have my lawyer rewrite it for both myself and a separate one for my wife .

He’s denying my wife access to an attorney how is this not judicial misconduct?

We will have two separate detailed investigations submitted with evidence of unethical behavior thank you
[Quoted text hidden]

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

Against Judge Ronald Richard

Lake Charles City Court

Calcasieu Parish Louisiana

Submitted by

John C J King Sr

Telephone 3189951705

Email truekingfile@gmail.com

Date April 2 2026

Mailing Address for Complaint

Judiciary Commission of Louisiana

Office of Special Counsel

601 St Charles Avenue

New Orleans Louisiana 70130 3481

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

Against Judge Ronald Richard

Lake Charles City Court

Calcasieu Parish Louisiana

Submitted by

John C J King Sr

Telephone 3189951705

Email truekingfile@gmail.com

Date April 2 2026

Mailing Address for Complaint

Judiciary Commission of Louisiana

Office of Special Counsel

601 St Charles Avenue

New Orleans Louisiana 70130 3481

I INTRODUCTION

This complaint is submitted as a separate and independent complaint regarding the conduct of Judge Ronald Richard of the Lake Charles City Court. My purpose is not simply to express disagreement with rulings. My concern is a broader pattern of intimidation, unequal treatment, procedural irregularities, disregard of medical vulnerability, and conduct that created the appearance that ordinary rules were not being applied fairly in matters involving me and my family.

I have also previously complained about Judge Richard. The Judiciary Commission acknowledged receipt of an earlier complaint and assigned File No. 25 062. I am submitting this complaint as a separate and expanded statement because additional facts, surrounding circumstances, and related events are relevant to understanding the full pattern of conduct and why I believe formal review is warranted.

II PRIOR SMALL CLAIMS CASE INVOLVING THEFT OF MY VEHICLE

Before the later notary case, I filed a small claims matter against the person who stole my vehicle. That earlier matter was also assigned to Judge Richard. In that case, I filed a motion that clearly stated my argument, and I attached exhibits that I believed supported it. The proof I relied on included materials that came from law enforcement. My concern is not limited to the fact that the case was dismissed with prejudice. My concern is that there appears to be no accessible minutes or transcript that would allow any later reviewer to evaluate what was argued, what evidence was actually considered, what objections were made, or how the ruling was justified.

I also recall that the person I sued was allowed to have a colleague appear for him in court. During that hearing, the atmosphere felt belittling. I perceived that the judge and that individual reminisced and interacted in a way that made me feel diminished as a litigant. At the same time, I was not afforded the same sense that my evidence would receive a fair and orderly review under normal procedure. My concern is not simply that the case was dismissed. My concern is that the absence of a record prevents meaningful review of whether proper procedure was followed at all.

III THE LATER NOTARY CASE AND RETURN OF THE MATTER TO JUDGE RICHARD

After the earlier vehicle related case, I was informed that because the later matter involved allegations of fraud by a notary, and because that notary was allegedly connected to other fraudulent events, justice might still be available through a different procedural path. I then pursued the later matter involving the notary, which became Case No. 23 2124. The uploaded court materials reflect that judgment in that case was rendered in open court on November 14 2024 and read and signed on November 21 2024, after which a devolutive appeal was granted on December 3 2024. The appellate writ materials also reflect that on December 30 2024 the trial court rescinded pauper status and ordered counsel to appear on matters outside the original attorney client agreement.

What troubled me in the later proceedings was that after a different judge had been assigned, the matter was reassigned back to Judge Richard. That reassignment heightened my concern that the same judge who had already made earlier decisions would again control later proceedings involving overlapping facts and credibility issues. In court, I believed Judge Richard was guiding the defense even though the

defendant was represented by counsel. I also believed that late, sloppy, or untimely filings were allowed for the defense even though I was given no comparable grace. Earlier filings in the uploaded record also state that motions by defense counsel were not served concurrently as required and that attorneys trying to enroll for me encountered resistance and discouragement from the clerk side of the court.

IV MEDICAL VULNERABILITY AND FAILURE TO ACCOMMODATE

A major part of my concern is the way my physical condition was handled. In filings related to the notary case, I raised that I was medically unable to travel safely and that forcing in person appearance posed serious risk. Those filings state that I was dealing with spinal cord swelling, temporary paralysis, seizure activity, inability to travel safely, and an urgent need for accommodation. A separate letter submitted to Judge Richard on November 14 2024 also requested privacy protections for my wife as a protected crime victim and asked the court to safeguard sensitive testimony and records. Later correspondence in this project also documents additional serious medical limitations.

On one of the court days that is central to this complaint, I had already been waiting while court matters were being heard. I was in extreme pain. I could not take my medicine when I needed it. I was on a walker. I was visibly vulnerable. I was twitching, crying uncontrollably, and in obvious distress. I believe that any reasonable judicial officer should have recognized the need for caution, de escalation, and accommodation rather than escalation and intimidation.

V POST RULING COMMAND TO LOCK THE COURTROOM DOORS

The event that most clearly reflected coercion to me happened after Judge Richard had already ruled on the matter that was before him. On that day, I had counsel present. I had previously appeared pro se in earlier stages, but for that hearing I had an attorney. After the ruling was issued and the case was complete, Judge Richard directly caused the courtroom doors to be locked. As I have stated, he said words to the effect of, "Nobody going anywhere yall lock them doors."

That was not my understanding of normal courtroom procedure after a completed ruling. I was on a walker at the time. Because of my physical condition, I could not move freely or quickly. Under those circumstances, locking the doors after the matter had concluded felt intimidating and threatening. I do not describe that moment as merely uncomfortable. I describe it as an assertion of control over me at a time when the case before the court was already over, when I was physically vulnerable, and when I was not in a position to safely or confidently navigate a coercive confrontation.

VI ATTEMPT TO FORCE MY ATTORNEY TO REPRESENT ME ON A MATTER NOT BEFORE THE COURT

While the courtroom was secured and movement restricted, Judge Richard tried to make my lawyer for the completed case represent me on another issue that had not occurred and was not the matter for which counsel had been retained. The appellate writ materials already in this project state that on December 30 2024 the trial court ordered Oliver Schrumpf to appear and represent John King in contempt proceedings or on matters raised in later in proper person pleadings even though counsel had not prepared those pleadings and had not undertaken to represent me on those issues.

That matters because it shows that my complaint is not just emotional disagreement with a courtroom moment. There is already documentary support in this project showing that the court ordered counsel to appear beyond the scope of the original representation after the case had proceeded to appeal. My concern is that the court was using its authority to expand the proceeding, pressure counsel, and create legal exposure outside the actual matter that had been adjudicated.

VII ACCUSATIONS THAT I WAS PRACTICING LAW AND USE OF UNRELATED CASE KNOWLEDGE

At the same time, Judge Richard accused me of practicing law or acted as though my prior lawful self representation was somehow improper. I had represented myself earlier in the case before retaining counsel. I was attempting to protect my own interests. I had also used technology tools, including AI drafting assistance, to help me prepare filings. I was not holding myself out as licensed counsel for the public. I was not purporting to be an attorney.

The accusation felt especially improper because it occurred while the judge was also making references to other cases in which he was not the assigned judge or was raising matters that were not before him at that time. That gave me the impression that he was drawing on outside knowledge and using it to try to coerce admissions, force explanations, or manufacture fault in me and in my wife after the case already in front of him had concluded.

VIII SCHOOL BOARD CONFLICT CONCERN

Another concern that I believe belongs in this complaint is that during the same general period as my first case in Judge Richard's court, he was also on the board of my children's charter school, Lake Charles Charter Academy. At that time I had obtained a restraining order in New Jersey because I was being stalked, my job was being harassed, and threats of violence from the opposing parent were constant. I have stated that I had an order allowing me to pick my children up from school in order to avoid conflict.

I was informed that even though I had that order, school personnel were told not to release my children to me. As I have stated it, I was told that the school's board member instructed them not to release my children to me despite me having an order which allowed it. I include this not as a stray grievance, but because it raised concern for me that Judge Richard's institutional role outside the courtroom may have intersected with family conflict involving me while he was also presiding over matters affecting me in court. Whether that concern proves a formal conflict is for investigators to decide. But it is part of the full context in which I experienced his conduct.

IX ESCALATION AGAINST MY WIFE

I have also alleged that after complaints were made regarding Judge Richard's behavior, the situation escalated against my wife. I have stated that an effort was first made to accuse her of practicing law, which I disputed and explained by stating that I used AI for help and that I had been the one protecting my own interests. I have further alleged that after that explanation, the focus shifted and a police officer fabricated a report and affidavit that were then used to create an unlawful warrant for my wife's arrest. I understand that such allegations are serious. I include them because they are part of the retaliatory

pattern that I believe followed our efforts to object, appeal, and complain.

An earlier complaint in this project already asserted that Judge Richard issued contempt related action against my spouse after she sought medical treatment during a hearing, that she was unlawfully detained in a sealed courtroom, denied restroom access, and threatened with incarceration despite not being on trial, and that repeated warnings about safety were disregarded. I am preserving those earlier allegations here because they are part of the same overall pattern I want the Commission to review.

X WHY I AM ASKING FOR INVESTIGATION

When I look at these events together, I do not see isolated misunderstandings. I see a pattern. I see an earlier vehicle theft related matter dismissed with prejudice without a meaningful record for review. I see later reassignment of the notary matter back to the same judge. I see unequal treatment in filings and courtroom management. I see disregard for medical vulnerability. I see a completed hearing turning into a locked courtroom confrontation. I see an attempt to force my lawyer into matters outside the representation. I see accusations that I was practicing law when I was trying to protect myself. I see references to unrelated cases. I see concern about outside institutional power through the school board. And I see escalation directed at my wife after complaints were made.

For those reasons, I respectfully request that the Judiciary Commission investigate Judge Richard's conduct in these matters, including the absence of a meaningful record in the earlier case, the handling of Case No. 23 2124, the events that occurred after the ruling when the courtroom doors were locked, the treatment of my attorney and my wife, and any conflict or improper influence that may have existed in connection with outside roles or retaliatory actions.

XI DECLARATION

I declare under penalty of perjury that the facts stated in this complaint are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

John C J King Sr 

Case # 23-2124
King Vs Amos Hartford

Exhibits to accompany judicial filings
Please refer to case law in motions

EXHIBITS 1: DENIAL OF RIGHT TO FAIR COUNSEL IN JUDICIAL PROCEEDINGS KAMIE DOMINIC MOTIONS ALLOWED TO CIRCUMVENT DUE PROCESS TO DISCOURAGE ENROLLMENT BY QUALIFIED COUNSEL IN TIME AS HER MOTIONS WERE NOT FILED AND SERVED SAME DAY MOTION TO QUASH AND STRIKE WAS FILED BUT NO STATUS CONFERENCE ABOUT THE CONCERNS

Correspondence from 4 of 7 Attorneys, 6 in total have had contact with the Clerk's office but when Shunte King POA / spouse John King Sr Spoke with Ms Monica Abshire on Monday Nov 4, 2024 after the legal holiday on Friday Nov 1 Ms Abshire told Shunte King that the clerk's office had had zero contact with any attorneys about the nature of the case of Judge Richards mood concerning the case but attached are 4 different Louisiana attorneys correspondence all stating the same sentiment and one attorney whose correspondence has not been provided for fear of retribution by Judge Richard it is emphasized that Judge Redd STRONGLY wants Renee Amos not to suffer damages of any sort as ‘she does not have a pot to piss in”; and there have been off record ex parte communications coming from the someone in the clerk's office who another attorney in writing has warned to get an attorney because the case appears to be heavily biased and there is resistance to cooperation within the clerk's office. In an urgent conversation with Ms Bash Judge Richards paralegal she asked Shunte King “are you implying that the clerk's office is dissuading counsel from enrolling on your case and that ex parte communication is taking place” ? When Shunte King responded “No I'm simply relying what the attorneys are saying . Ms Bash then said “I don't believe that at all King has had plenty of time to enroll counsel” then Shunte King told bash there was evidence of multiple attorneys complaining that the clerk's office was creating hurdles to enrollment by saying it would be a long time to send the case file then offering personal expressions on behalf of Judge Redds mood and sentiment. This would be a violation of King civil rights, and any order placing King in medical danger once Richard is made aware there would be grounds for medical injunction by the state of new jersey to prevent orders to move an unreleased patient out of state documented with heightened risk for stroke, permanent paralysis or death from seizure as documented in the hospital inpatient records King currently suffers from seizures as a result of a fall and is experiencing rehabilitation treatments daily until November 13 2024 to coerce spinal cord back into spinal cavity. The extent of the disease's damage was reassessed Nov 5 and MRI results have not come back. The plaintiff is proceeding assuming that Judge Richard will intervene to stop this once the Judge is aware.

23-2124 John C. J. King Sr. vs. Renee Amos

Monica Abshire <mabshire@lccitycourt.onmicrosoft.com> Tue, Aug 13, 10:48 AM
to me

Good Morning Mr. King –

This is to inform you Judge Richard has granted your Pauper Affidavit.
You will be allowed from this date, August 13, 2024 to file in Pauper status, waiving any deposits required, but not relieving you of costs.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

True King <truekingfile@gmail.com> Wed, Oct 23, 12:22 PM
to shantell, Monica, bcc: me, bcc: Tyria

Monica
Thank you for the update.

Attached is Shantell from our attorneys office.
We're in need of some things that are not clear and hope that you could help Shantell.

Shantell,
This is Ms Abshire the Lake Charles City Court Clerk. She may be able to answer your questions.

Whitney Triplet <whitney@rouzanlaw.com> Thu, Aug 1, 4:06 PM
to me

Good afternoon,

I've finally made it back into the office, and I looked again through what you've sent. The car case is missing documentation of orders that you told me exist. Specifically, the motion to reconsider that she filed should have a signed judgment issued by the judge, and I don't know what else may be out there that she has secretly filed.

In order to proceed at a by the hour billing, this firm requires a $10,000 retainer that my boss requires to be paid prior to any work that is not on a contingency.

Again, I really would like to take this on for you; but there is too much information and background things that have happened that are unknown to me. Once you are able to gather and confirm all pleadings and judgments that have been filed and stamped by the clerk, then we can revisit this. In the meantime, if you decide to handle this pro se, (and this is my personal opinion, not legal advice) your next step may want to be to deliver to the opposing counsel some interrogatories where you are asking specific questions about the incident. You should send them to Ms. Amos through her attorney. You could copy the format of the questions she sent you. Be very specific with your questions. Also make sure to send some to the insurance so they see you are serious about pursuing this.

At this time, that is the most that I can do to assist you. There are just too many gaps in the information available to me.

Whitney Simone Triplet
Attorney at Law
Don A. Rouzan & Associates, L.L.C.
Mailing Address:
P.O. Box 871687
New Orleans, LA 70187-1687
Physical Address:

-

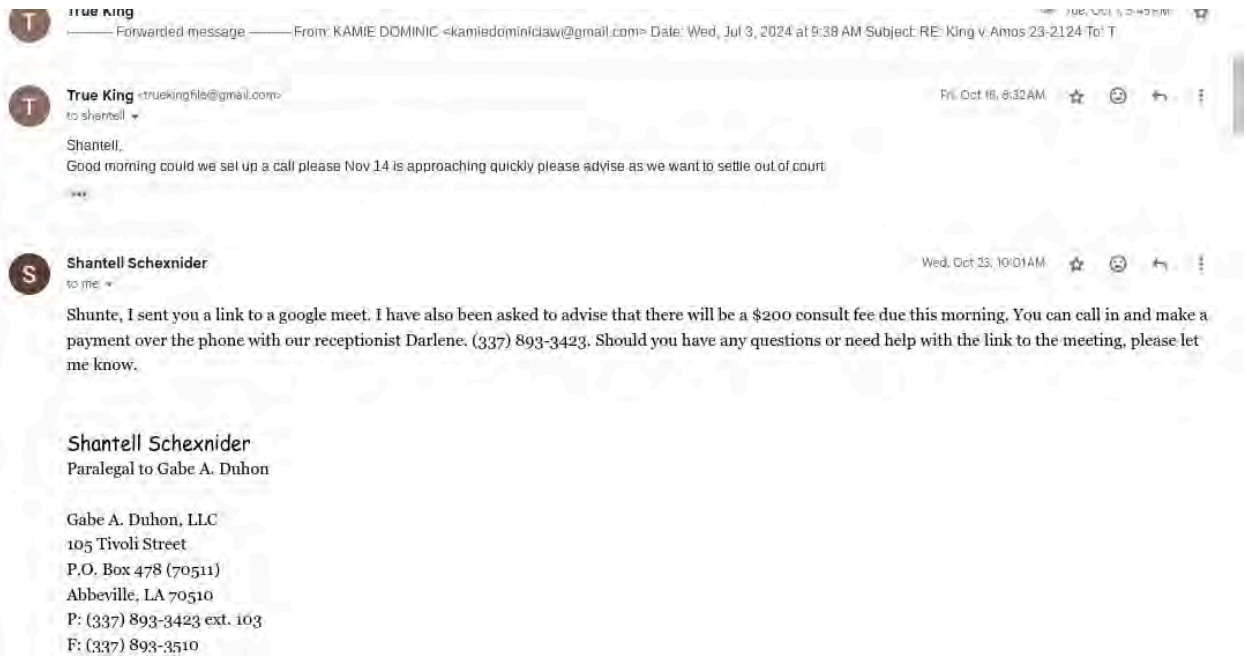
**

True King Oct 23, 2024, 10:28 AM
Hello Shantel,Where is the link I just saw this email.

Shantell Schexnider Oct 23, 2024, 10:30 AM
https://meet.google.com/kau-eoqx-hyb From: True King <truekingfile@gmail.com> Sent: Wednesday, October 23, 2024 2:28 PM To: Shantell Schexnider <shantell@vermil

True King <truekingfile@gmail.com> Oct 23, 2024, 10:33 AM
to Shantell

**



True King
---------- Forwarded message ---------- From: KAMIE DOMINIC <kamiedominiclaw@gmail.com> Date: Wed, Jul 3, 2024 at 9:38 AM Subject: RE: King v. Amos 23-2124 To: T

True King <truekingfile@gmail.com> Fri, Oct 18, 8:32 AM
to shantell

Shantell,
Good morning could we set up a call please Nov 14 is approaching quickly please advise as we want to settle out of court

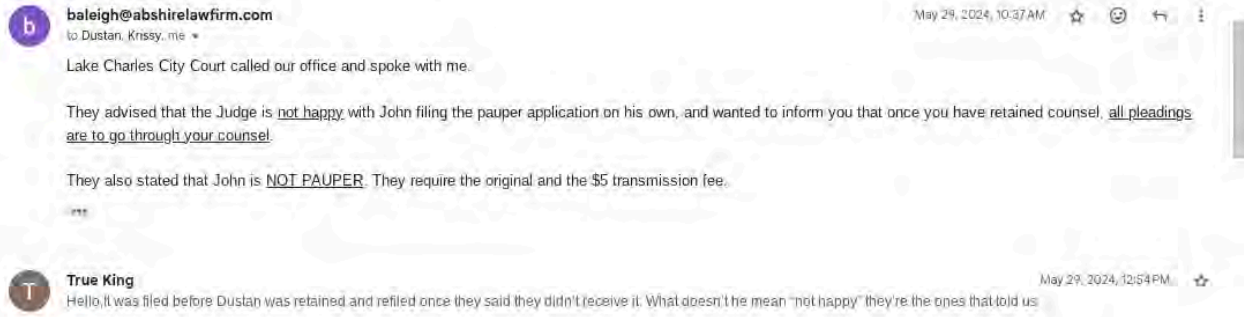
Shantell Schexnider Wed, Oct 23, 10:01 AM
to me

Shunte, I sent you a link to a google meet. I have also been asked to advise that there will be a $200 consult fee due this morning. You can call in and make a payment over the phone with our receptionist Darlene. (337) 893-3423. Should you have any questions or need help with the link to the meeting, please let me know.

Shantell Schexnider
Paralegal to Gabe A. Duhon

Gabe A. Duhon, LLC
105 Tivoli Street
P.O. Box 478 (70511)
Abbeville, LA 70510
P: (337) 893-3423 ext. 103
F: (337) 893-3510

**



baleigh@abshirelawfirm.com May 29, 2024, 10:37 AM
to Dustan, Krissy, me

Lake Charles City Court called our office and spoke with me.

They advised that the Judge is not happy with John filing the pauper application on his own, and wanted to inform you that once you have retained counsel, all pleadings are to go through your counsel.

They also stated that John is NOT PAUPER. They require the original and the $5 transmission fee.

True King May 29, 2024, 12:54 PM
Hello,It was filed before Dustan was retained and refiled once they said they didn't receive it. What doesn't he mean "not happy" they're the ones that told us

***



Joseph Burke Nov 1, 2024, 11:22 AM (5 days ago)
to me, Chelsea, Hannah

Mrs. King,

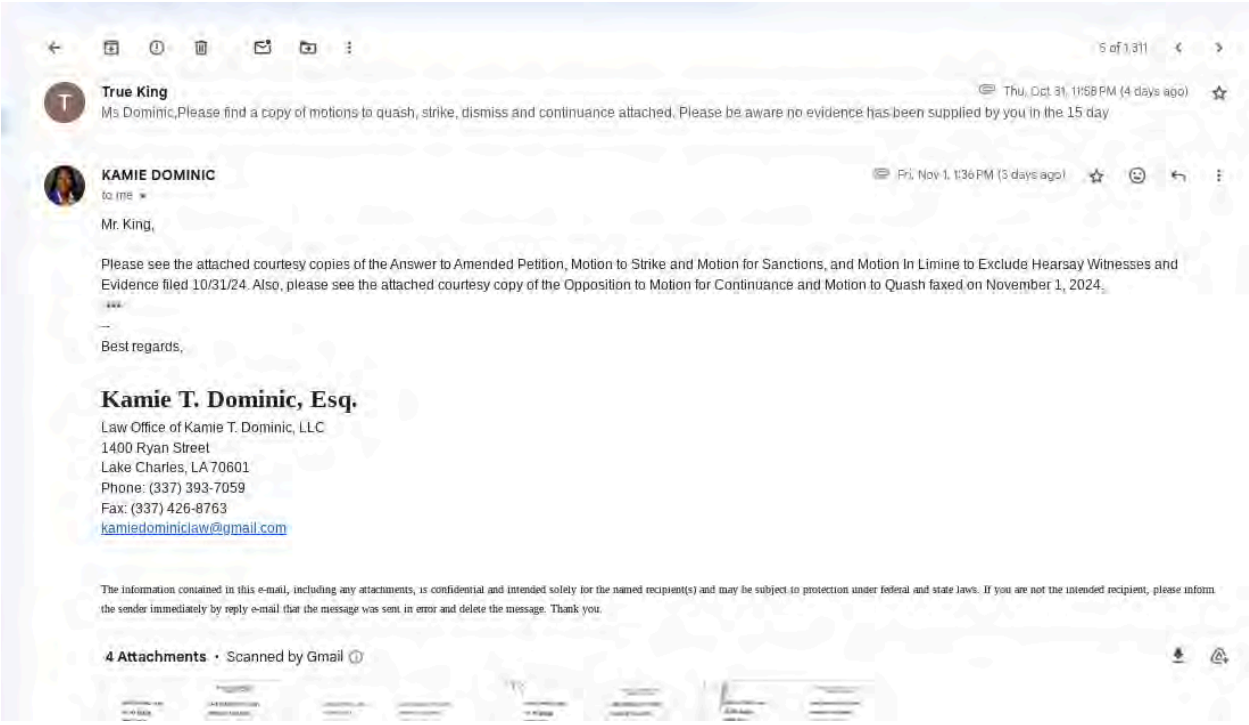
I was simply relaying the docket information provided to me from the court's clerk. I do now know what the subject of the motion or sanctions is.

Thanks,

Joe
Sent from my iPhone

> On Oct 31, 2024, at 1:14 PM, True King <truekingfile@gmail.com> wrote:

***



5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.
Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail

*** Medical Exhibits sent to Judge Richard and Kamie Dominic on Monday Nov 4, 2024 with request to be sealed.***

EXHIBITS SECTION #2 HARASSMENT OF COLSTON AND HER ATTORNEY ATTEMPTS AT UNETHICAL INVOLVEMENT IN COURT PROCEEDINGS AND UNDOCUMENTED ATTENDANCE AT CLOSED COURT HEARING FOR CASE #23-2124

Mail weekly sent to my mothers house. She goes to the post office and mails things to keep my mother and grandmother sick.
Charmaine does not recognize this behavior as insane or inappropriate seeing as though my wife has never met my children and has never even had a conversation with charmaine. This is years later after stealing the car and she does this and brags that there won't be justice for me or a punishment for her.

This is sick. This isn't a paramour, this is a mentally disturbed individual and Ms Dominic should remain ethical when dealing with victims. I hadn't seen Charmaine colston in person in 13 months at the time of car theft so how is that a paramour? I was married and living with my wife. It's more lies this is the harassment contributing to my seizures and paralysis and to discriminate against my gender is unethical and slander.



lies

Tyria's comment on your post

Tyria Guillory
I don't agree with him on make it work that is not good for a women or man that only wants control and not have a relationship for the kids. My nephew stayed with his kids mother regardless to the mental and physical abuse that he was hiding from his family. She cut him, burned him, she it him in the head with an object that left him with seizures. you have to do what is best for you, especially i... See more

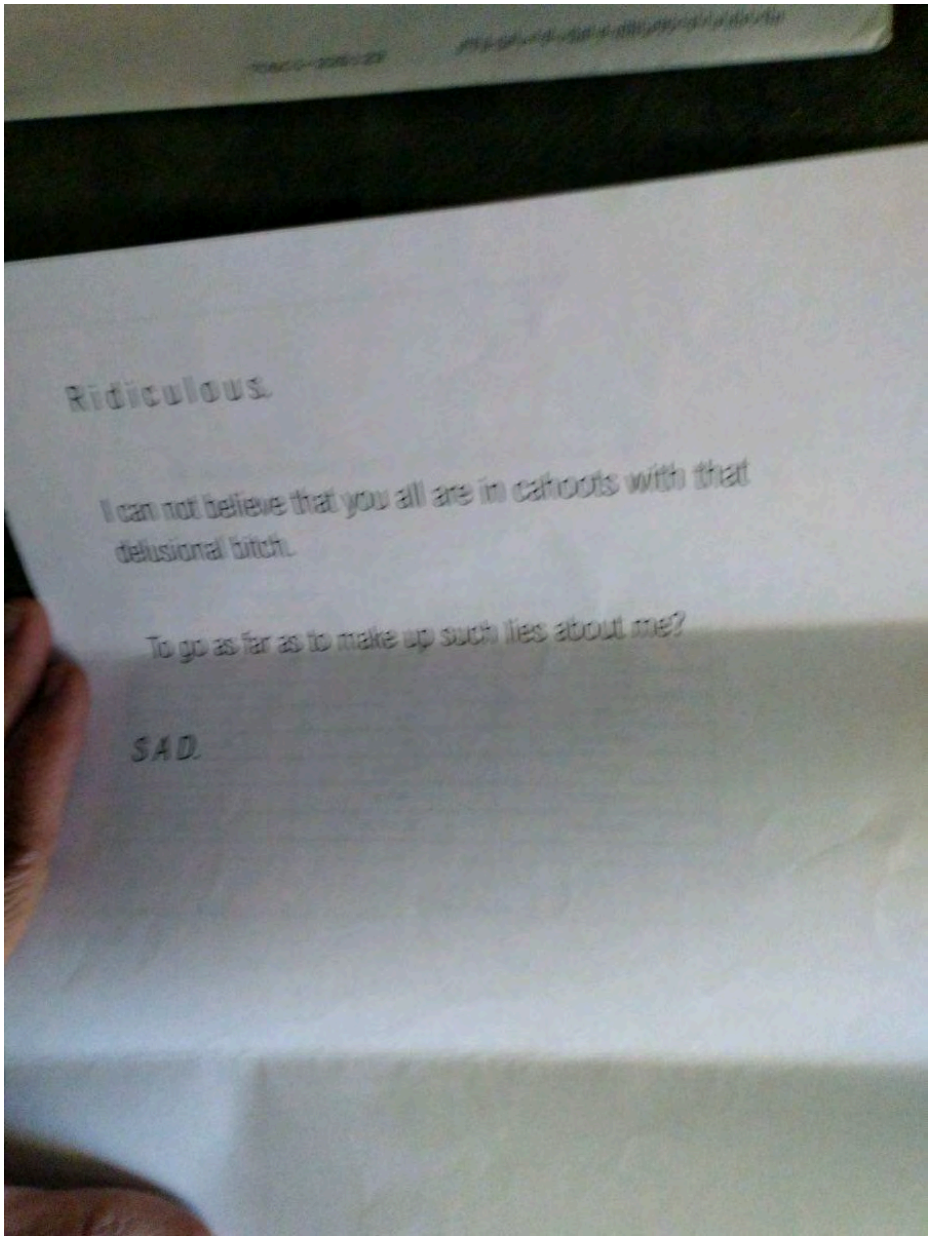
7h Like Reply 1

King Tay
Tyria Guillory I would settle for just keeping my photos, name, my likeness , my husbands god baby photos, shoot just don't post anyone that isn't posting you.

Or you will be subpoenaed to court if you deal with them and lose money off work...
-OR you will be accused of harassment. She gonna initiate every text, email, and mail stuff to your house "good morning ALL", as if you got a wedding ring t... See more

33m Like Reply


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123

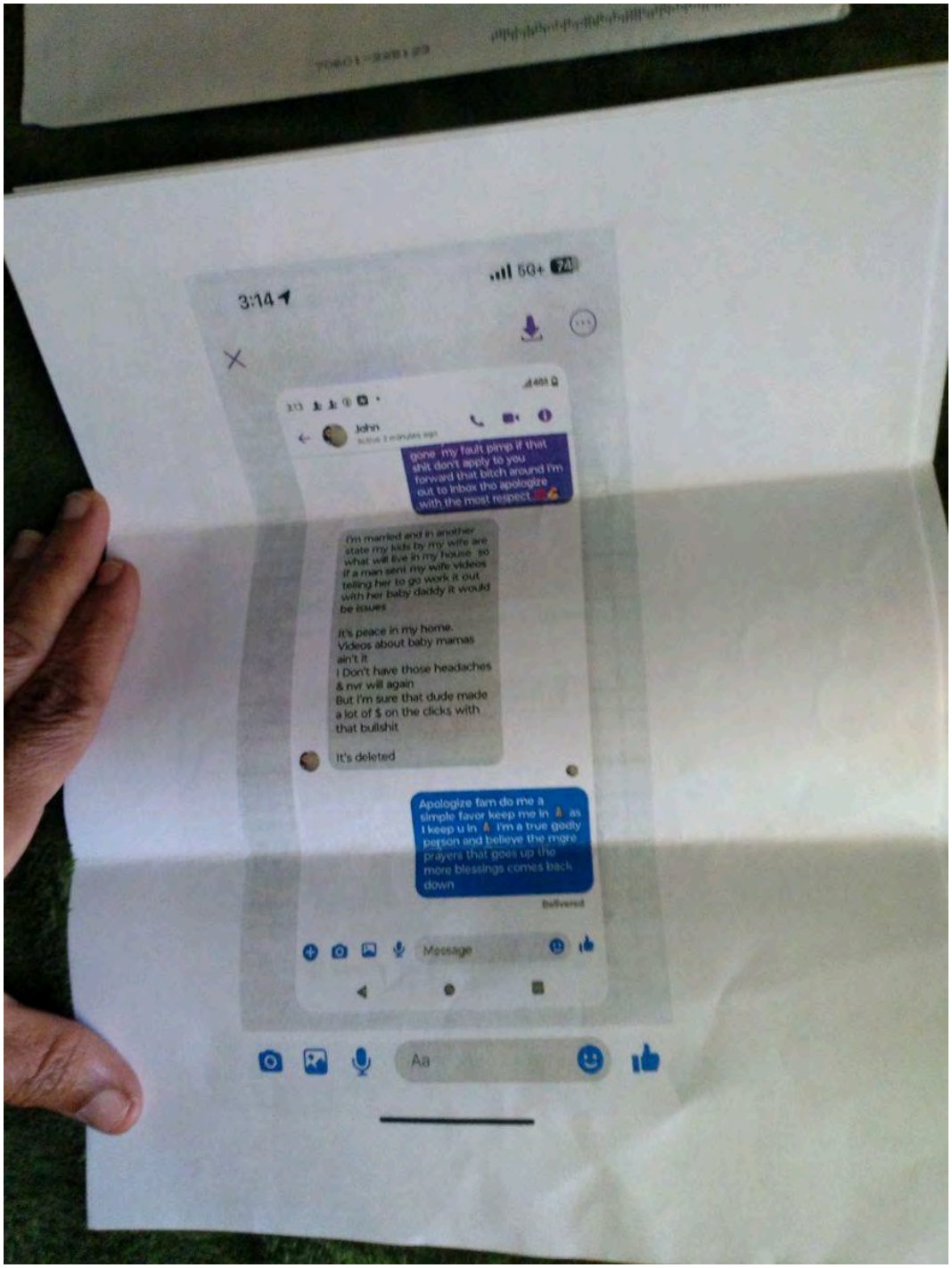


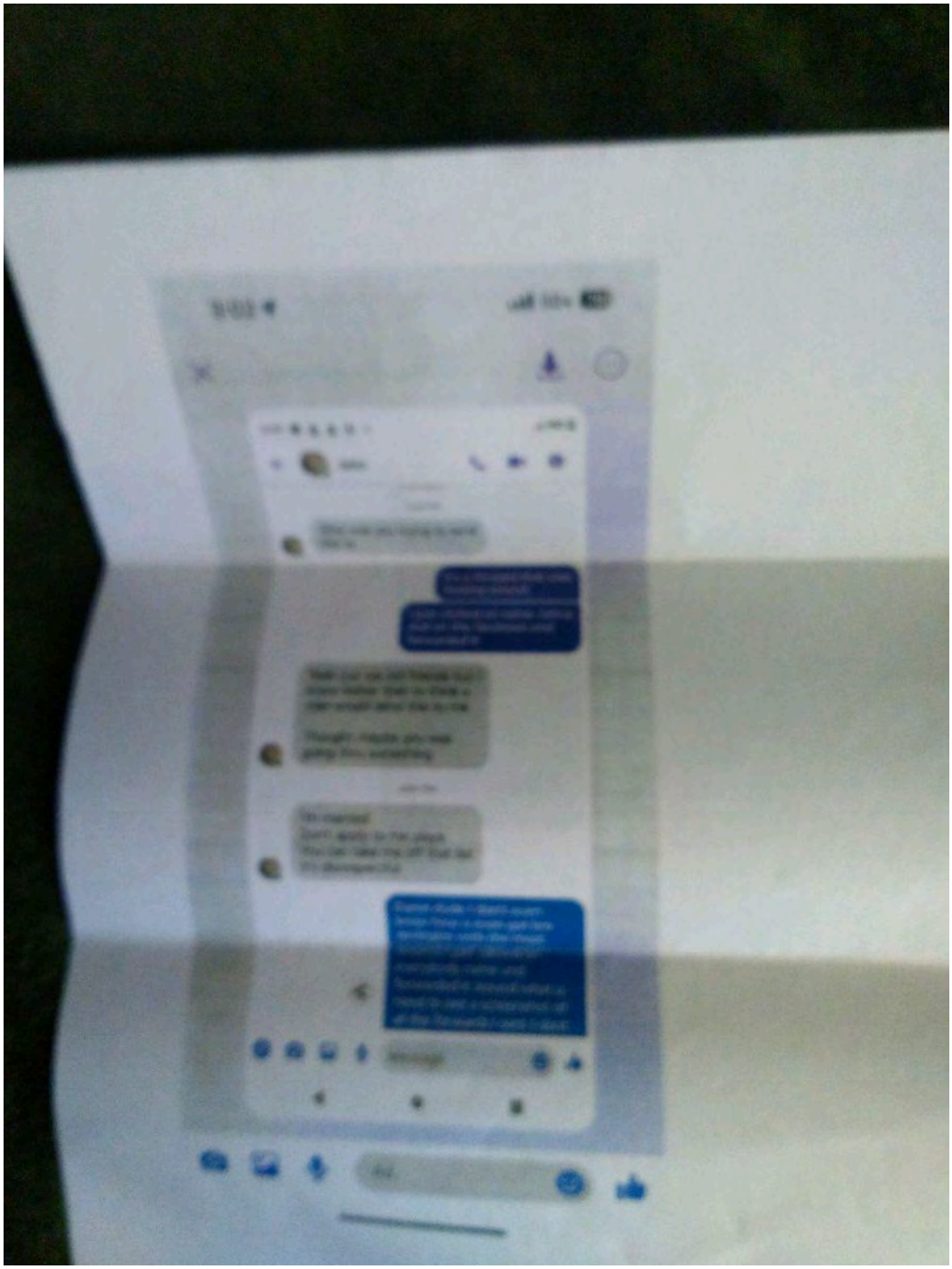
Ridiculous.

I can not believe that you all are in cahoots with that delusional bitch.

To go as far as to make up such lies about me?

SAD.

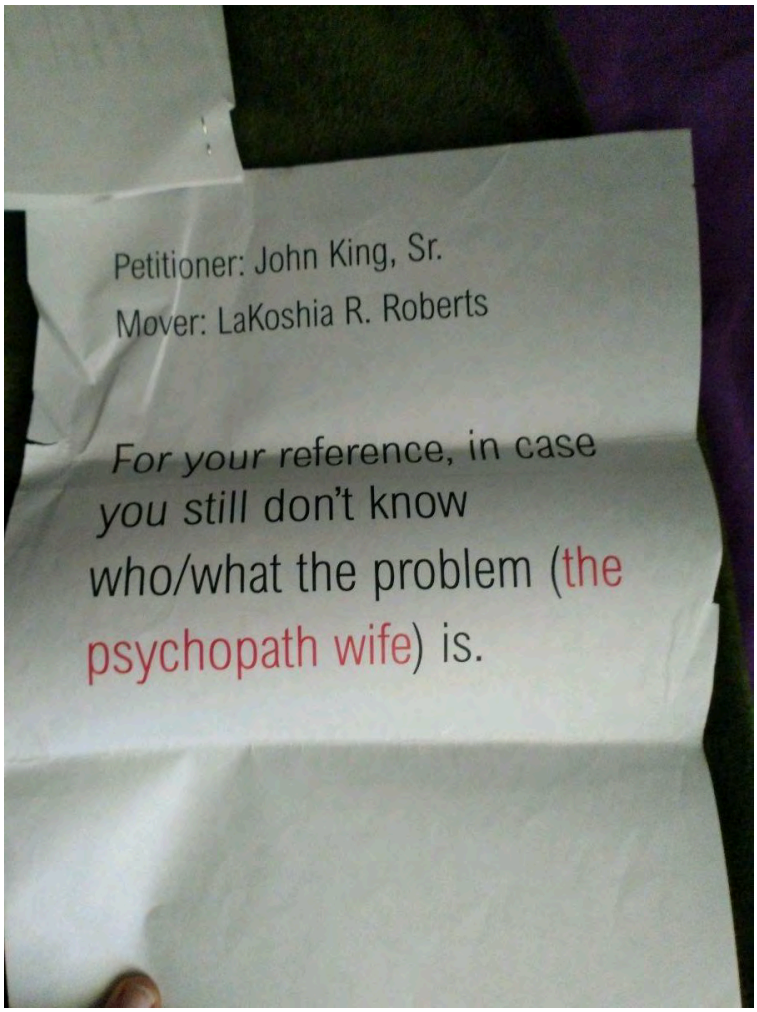

3:14
5G+
John
gone my fault pimp if that shit don't apply to you forward that bitch around I'm out to inbox tho apologize with the most respect
I'm married and in another state my kids by my wife are what will live in my house so if a man sent my wife videos telling her to go work it out with her baby daddy it would be issues
It's peace in my home. Videos about baby mamas ain't it
I Don't have those headaches & nvr will again
But I'm sure that dude made a lot of $ on the clicks with that bullshit
It's deleted
Apologize fam do me a simple favor keep me in 🙏 as I keep u in 🙏 I'm a true godly person and believe the more prayers that goes up the more blessings comes back down
Delivered
Message
Aa




King
921 Moss St.
Lake Charles, La 70601
BATON ROUGE LA 707
19 JUL 2024 PM 1 L
FREEDOM
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123


King
821 Moss St.
Lake Charles, LA 70601
BATON ROUGE LA 707
7 AUG 2024 PM 3 L
FREEDOM
Monica King Guillory
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123




Petitioner: John King, Sr.
Mover: LaKoshia R. Roberts
For your reference, in case you still don't know who/what the problem (the psychopath wife) is.


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave
Lake Charles, La 70601
70601-225123

John C. J. King

123 N. Louisiana Avenue

Lake Charles, LA, 70615

Truekingfile@gmail.com

318-995-6021

01-05-25

Judicial Commission of Louisiana

Subject: Judicial Complaint Against Judge Ron Richard

Lake Charles City Court Judge

Lake Charles, Louisiana

To Whom It May Concern,

I am submitting this formal complaint against the Honorable Judge Ron Richard of the City Court of Lake Charles, Louisiana, regarding conduct in Case No. 23-2124 (King v. Amos, The Hartford). This complaint arises from repeated incidents of judicial misconduct, bias, procedural irregularities, and actions that have resulted in severe harm to me and my family.

1. Basis for Complaint

Judge Richard has demonstrated persistent bias and unfair treatment throughout the proceedings, including:

- Judicial Bias & Prejudice: Making inappropriate comments, engaging in retaliatory behavior, and allowing ex parte communications that compromised my legal representation.

- Violation of Due Process: Denying me adequate notice for hearings, allowing opposing counsel to submit untimely motions, and proceeding without ensuring my legal representation.

- Endangerment of a Protected Witness: Ignoring my medical condition, requiring in-person appearances despite physical immobility, and disregarding my warnings about threats to my spouse’s safety, which ultimately resulted in a fatal incident.

- Procedural Misconduct: Improper courtroom procedures, misrepresentation by court clerks regarding counsel enrollment, and the use of fabricated addresses to harass my family.

2. Specific Incidents of Concern

1. Retaliatory Conduct: Judge Richard issued contempt charges against my spouse days after she sought medical treatment during a hearing, despite my seizure in court being ignored.

2. Ex Parte Communications & Intimidation: Legal counsel was dissuaded from representing me due to private discussions with the judge, violating ethical standards.

3. Unlawful Detention & Threats: My spouse was unlawfully detained in a sealed courtroom, denied restroom access, and threatened with incarceration despite not being on trial.

4. Failure to Act on Safety Warnings: I repeatedly warned the court that its negligence would lead to harm, which tragically resulted in a homicide directly tied to this case.

3. Request for Investigation & Action

Given these serious violations, I respectfully request the Judicial Commission to:

- Conduct a formal investigation into Judge Ron Richard's conduct in Case No. 23-2124.

- Review his actions for violations of judicial ethics, including bias, due process violations, and endangerment of a witness.

- Take appropriate disciplinary action to prevent further harm to litigants appearing before his court.

I have attached supporting documentation, including my motion to recuse Judge Richard, which outlines additional details. Please confirm receipt of this complaint and advise on any further steps necessary.

Sincerely,

John C. King Sr
123 N. Louisiana Avenue
Lake Charles La 70601
truekingfile@gmail.com

URGENT ATTN:
12/12/2024

IN THE CITY COURT OF LAKE CHARLES STATE OF LOUISIANA

John C. King Sr., Plaintiff/Defendant, v. Amos The Hartford, Defendant/Plaintiff.

CASE NO. 23-2124

EMERGENCY MOTION TO RECUSE/REMOVE HONORABLE JUDGE RON RICHARD

MOTION TO VACATE RETALIATORY JUDGMENTS

MOTION TO STRIKE AND SEAL IDENTIFYING INFORMATION FROM PUBLIC RECORD

MOTION TO INTERVENE TO PREVENT FURTHER JUDICIAL HARASSMENT AND LOSS OF LIFE

NOW INTO COURT, through undersigned counsel, comes John C. King, Pro Se litigant, respectfully moving this Honorable Court to:

1. Recuse the Honorable Judge Ron Richard from presiding over this matter due to bias, prejudice, and conduct endangering a protected witness.
2. Vacate retaliatory judgments against John & Shunte King.
3. Strike and seal identifying information of King and spouse from public record.
4. Intervene to prevent further judicial harassment and loss of life following preventable homicide occurring December 11, 2024 that was forewarned would be an attempt on the life and safety of Mrs King and was ignored.

I. FACTUAL BACKGROUND

1. The undersigned has raised concerns about Judge Richard's impartiality based on specific actions and comments that exhibit bias and prejudice against the Plaintiff.
2. Judge Richard's conduct includes, but is not limited to:
    - Allowing ex parte communications that intimidated existing legal counsel and dissuaded new counsel from enrolling.
    - Disregarding procedural rules, such as timely service and filing requirements, to the detriment of the Plaintiff.
    - Permitting opposing counsel to submit untimely and defamatory motions, including false allegations of infidelity, without evidence.
    - Endangering a protected witness by failing to consider Plaintiff's medical condition and imposing unreasonable demands for in-person appearances despite physical immobility.
3. These actions have resulted in loss of legal representation, procedural disadvantages, and endangerment to Plaintiff's life and safety.

4. Specific incidents include:
    - Misrepresentation by court clerks regarding enrollment of counsel.
    - Improper courtroom presence of unrecorded non-parties, such as Orelia Lawdins-Trent.
    - Denial of motions submitted via alternative means during technical failures at the clerk's office.
    - False claims of practicing law brought against Plaintiff’s spouse, Shunte King, resulting in financial abuse due to unnecessary travel expenses and threats by the District Attorney, only to later find no evidence of such claims.
    - Retaliatory contempt charges filed seven days after Plaintiff’s spouse sought medical care during court proceedings, despite Plaintiff suffering a seizure in the courtroom and Judge Richard refusing required medical breaks. These actions resulted in permanent nerve damage to Plaintiff.
    - Holding immediate hearings without notice or legal representation for the accused, in violation of due process rights.
    - Engaging in unlawful detention by sealing the courtroom, preventing Plaintiff’s spouse from leaving post-proceedings, denying restroom access, and threatening incarceration despite her not being on trial or subpoenaed, and not residing in Judge Richard’s jurisdiction.
    - Making references to unrelated cases involving other judges and asserting that Plaintiff did not fear for his life, despite being warned that such recklessness would lead to harm. This resulted in a homicide three weeks later, directly tied to the warnings issued to Judge Richard.
    - Referencing Plaintiff’s social media and engaging in discriminatory retaliation, which endangered Plaintiff’s spouse, Shunte King, who later experienced an attempt on her life at her home, resulting in one fatality.
    - Inconsistent application of judgment, such as refusing to serve Charmaine Coslton at her attorney's office while insisting on serving Plaintiff’s spouse, a non-Louisiana resident, on November 21, 2024, at Attorney Schrumpf’s office. Schrumpf had explicitly stated in writing that he did not represent Mrs. King, making the service ineffective.
    - Judge Richard repeatedly attempted to serve Mrs. King at improper addresses, including fabricated addresses in Iowa, Louisiana, solely to inflate fees and harass Plaintiff’s family.

II. LEGAL GROUNDS FOR RECUSAL

4. Pursuant to Louisiana Code of Civil Procedure Article 151, a judge shall be recused if:
    - They exhibit personal bias or prejudice concerning a party.
    - Their impartiality might reasonably be questioned due to their actions or comments.
5. Canon 3E of the Louisiana Code of Judicial Conduct mandates judges to disqualify themselves in any proceeding where their impartiality might reasonably be questioned.
6. The following evidence supports the need for recusal:
    - Disregard for Plaintiff's procedural and substantive rights.
    - Actions and comments that create a perception of bias and unfair treatment.
    - Endangerment of Plaintiff's health and safety due to unreasonable judicial orders.

III. SPECIFIC CLAIMS AND SUPPORTING LAWS

1. Judicial Bias:

- Inappropriate comments and unequal treatment.
- Louisiana Code of Civil Procedure Article 151 and Canon 3E of the Louisiana Code of Judicial Conduct.

2. Procedural Misconduct:

- Failure to enforce timely filing and service requirements (La. Code Civ. Proc. art. 1313).
- Allowing unsubstantiated claims to enter the record, causing potential harm to Plaintiff's legal and financial standing.

3. Endangerment of Witness Safety:

- Refusal to accommodate Plaintiff's medical condition for remote appearances, violating constitutional rights to due process and safety.
- Relevant federal protections under the Americans with Disabilities Act (ADA) and HIPAA.

4. Improper Service:

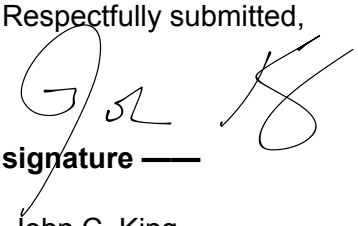
- Serving non-residents at incorrect or fabricated addresses in violation of La. Code Civ. Proc. art. 1231.
- Ignoring written statements from legal counsel regarding representation and jurisdiction.

IV. REQUEST FOR RELIEF

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests this Honorable Court to:

1. Recuse the Honorable Judge Ron Richard from all proceedings related to this matter.
2. Vacate all retaliatory judgments against John & Shunte King.
3. Strike and seal identifying information of Plaintiff and spouse from the public record to ensure their safety.
4. Intervene to prevent further judicial harassment, ensure a fair trial, and protect Plaintiff's constitutional rights.
5. Reverse all unjustified fees resulting from retaliatory judgments.
6. Amend existing judgment to require Renee Amos to pay her own court costs.

Respectfully submitted,



signature ——

John C. King

123 N. Louisiana Avenue

Lake Charles, LA 70601

truekingfile@gmail.com

318.995.1705

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was served upon all parties or their counsel of record via email or fax on this —— day of ——, 20——. 12th Day of December, 2024

signature ——

John C. King

ORDER

Considering the foregoing motion:

IT IS HEREBY ORDERED that:

1. The Honorable Judge Ron Richard is recused from presiding over any further proceedings in this matter.
2. All retaliatory judgments against John & Shunte King are vacated.
3. Identifying information of Plaintiff and spouse shall be stricken and sealed from public records.
4. All unjustified fees resulting from retaliatory judgments are reversed.
5. The existing judgment is amended to require Renee Amos to pay her own court costs.

SIGNED this —— day of ——, 20——.

HONORABLE JUDGE, Calcasieu Parish, Louisiana

URGENT ATTN:
12/12/2024

IN THE CITY COURT OF LAKE CHARLES STATE OF LOUISIANA

John C. King Sr., Plaintiff/Defendant, v. Amos The Hartford, Defendant/Plaintiff.

CASE NO. 23-2124

EMERGENCY MOTION TO RECUSE/REMOVE HONORABLE JUDGE RON RICHARD

MOTION TO VACATE RETALIATORY JUDGMENTS

MOTION TO STRIKE AND SEAL IDENTIFYING INFORMATION FROM PUBLIC RECORD

MOTION TO INTERVENE TO PREVENT FURTHER JUDICIAL HARASSMENT AND LOSS OF LIFE

NOW INTO COURT, through undersigned counsel, comes John C. King, Pro Se litigant, respectfully moving this Honorable Court to:

1. Recuse the Honorable Judge Ron Richard from presiding over this matter due to bias, prejudice, and conduct endangering a protected witness.
2. Vacate retaliatory judgments against John & Shunte King.
3. Strike and seal identifying information of King and spouse from public record.
4. Intervene to prevent further judicial harassment and loss of life following preventable homicide occurring December 11, 2024 that was forewarned would be an attempt on the life and safety of Mrs King and was ignored.

I. FACTUAL BACKGROUND

1. The undersigned has raised concerns about Judge Richard's impartiality based on specific actions and comments that exhibit bias and prejudice against the Plaintiff.
2. Judge Richard's conduct includes, but is not limited to:
    - Allowing ex parte communications that intimidated existing legal counsel and dissuaded new counsel from enrolling.
    - Disregarding procedural rules, such as timely service and filing requirements, to the detriment of the Plaintiff.
    - Permitting opposing counsel to submit untimely and defamatory motions, including false allegations of infidelity, without evidence.
    - Endangering a protected witness by failing to consider Plaintiff's medical condition and imposing unreasonable demands for in-person appearances despite physical immobility.
3. These actions have resulted in loss of legal representation, procedural disadvantages, and endangerment to Plaintiff's life and safety.

4. Specific incidents include:
    - Misrepresentation by court clerks regarding enrollment of counsel.
    - Improper courtroom presence of unrecorded non-parties, such as Orelia Lawdins-Trent.
    - Denial of motions submitted via alternative means during technical failures at the clerk's office.
    - False claims of practicing law brought against Plaintiff’s spouse, Shunte King, resulting in financial abuse due to unnecessary travel expenses and threats by the District Attorney, only to later find no evidence of such claims.
    - Retaliatory contempt charges filed seven days after Plaintiff’s spouse sought medical care during court proceedings, despite Plaintiff suffering a seizure in the courtroom and Judge Richard refusing required medical breaks. These actions resulted in permanent nerve damage to Plaintiff.
    - Holding immediate hearings without notice or legal representation for the accused, in violation of due process rights.
    - Engaging in unlawful detention by sealing the courtroom, preventing Plaintiff’s spouse from leaving post-proceedings, denying restroom access, and threatening incarceration despite her not being on trial or subpoenaed, and not residing in Judge Richard’s jurisdiction.
    - Making references to unrelated cases involving other judges and asserting that Plaintiff did not fear for his life, despite being warned that such recklessness would lead to harm. This resulted in a homicide three weeks later, directly tied to the warnings issued to Judge Richard.
    - Referencing Plaintiff’s social media and engaging in discriminatory retaliation, which endangered Plaintiff’s spouse, Shunte King, who later experienced an attempt on her life at her home, resulting in one fatality.
    - Inconsistent application of judgment, such as refusing to serve Charmaine Coslton at her attorney's office while insisting on serving Plaintiff’s spouse, a non-Louisiana resident, on November 21, 2024, at Attorney Schrumpf’s office. Schrumpf had explicitly stated in writing that he did not represent Mrs. King, making the service ineffective.
    - Judge Richard repeatedly attempted to serve Mrs. King at improper addresses, including fabricated addresses in Iowa, Louisiana, solely to inflate fees and harass Plaintiff’s family.

II. LEGAL GROUNDS FOR RECUSAL

4. Pursuant to Louisiana Code of Civil Procedure Article 151, a judge shall be recused if:
    - They exhibit personal bias or prejudice concerning a party.
    - Their impartiality might reasonably be questioned due to their actions or comments.
5. Canon 3E of the Louisiana Code of Judicial Conduct mandates judges to disqualify themselves in any proceeding where their impartiality might reasonably be questioned.
6. The following evidence supports the need for recusal:
    - Disregard for Plaintiff's procedural and substantive rights.
    - Actions and comments that create a perception of bias and unfair treatment.
    - Endangerment of Plaintiff's health and safety due to unreasonable judicial orders.

III. SPECIFIC CLAIMS AND SUPPORTING LAWS

1. Judicial Bias:

- Inappropriate comments and unequal treatment.
- Louisiana Code of Civil Procedure Article 151 and Canon 3E of the Louisiana Code of Judicial Conduct.

2. Procedural Misconduct:

- Failure to enforce timely filing and service requirements (La. Code Civ. Proc. art. 1313).
- Allowing unsubstantiated claims to enter the record, causing potential harm to Plaintiff's legal and financial standing.

3. Endangerment of Witness Safety:

- Refusal to accommodate Plaintiff's medical condition for remote appearances, violating constitutional rights to due process and safety.
- Relevant federal protections under the Americans with Disabilities Act (ADA) and HIPAA.

4. Improper Service:

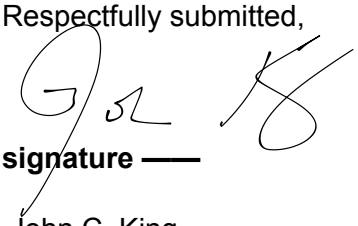
- Serving non-residents at incorrect or fabricated addresses in violation of La. Code Civ. Proc. art. 1231.
- Ignoring written statements from legal counsel regarding representation and jurisdiction.

IV. REQUEST FOR RELIEF

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests this Honorable Court to:

1. Recuse the Honorable Judge Ron Richard from all proceedings related to this matter.
2. Vacate all retaliatory judgments against John & Shunte King.
3. Strike and seal identifying information of Plaintiff and spouse from the public record to ensure their safety.
4. Intervene to prevent further judicial harassment, ensure a fair trial, and protect Plaintiff's constitutional rights.
5. Reverse all unjustified fees resulting from retaliatory judgments.
6. Amend existing judgment to require Renee Amos to pay her own court costs.

Respectfully submitted,



signature ——

John C. King

123 N. Louisiana Avenue

Lake Charles, LA 70601

truekingfile@gmail.com

318.995.1705

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was served upon all parties or their counsel of record via email or fax on this —— day of ——, 20——. 12th Day of December, 2024

signature ——

John C. King

ORDER

Considering the foregoing motion:

IT IS HEREBY ORDERED that:

1. The Honorable Judge Ron Richard is recused from presiding over any further proceedings in this matter.
2. All retaliatory judgments against John & Shunte King are vacated.
3. Identifying information of Plaintiff and spouse shall be stricken and sealed from public records.
4. All unjustified fees resulting from retaliatory judgments are reversed.
5. The existing judgment is amended to require Renee Amos to pay her own court costs.

SIGNED this —— day of ——, 20——.

HONORABLE JUDGE, Calcasieu Parish, Louisiana

Tuesday, November 19, 2024

CITY COURT
City of Lake Charles, Louisiana

P.O. Box 1664
Lake Charles, Louisiana 70602
(337) 491-1564

Hearing NOTICE

Plaintiff **KING, JOHN CLIFFORD J**

ATTN: OLIVER JACKSON SCHRUMPF
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

JOHN CLIFFORD J KING

VS SuitNo: **23-2124**

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Contempt of Court on Shunte King

Please be advised that the above numbered and entitled cause has been fixed for **Hearing** at **9:00 AM** on **Wednesday, January 22, 2025**, in the City Court Building located at **118 West Mill Street, Lake Charles, La.**

Should you need witnesses, please furnish us with the name and addresses at least 1 (one week in advance of the trial date. We require advance deposit to cover service and witness fees

If you have any type of audio/visual presentation, please contact our office at (337) 491-1564 to set up or got to www.lccitycourt.org for instructions.

Clerk

RECD LC CITY COURT CIV
'24 NOV 15 PM 3:38

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS. NO. 23-2124	:	WARD 3, CALCASIEU PARISH
RENEE AMOS NOTARY PUBLIC ID# 29374	:	STATE OF LOUISIANA
FILED: 11-15-2024	:	M Clerk ~~DEPUTY~~ CLERK OF COURT

RULE TO SHOW CAUSE

SHUNTE KING (a non-party in the referenced matter) is hereby ordered to appear on the 22nd day of January, 2025 at 9:00 o'clock A.m., to show cause why she should not be held in contempt of court, pursuant to LSA – C.C.P. Art. 222, based on the following:

1. Willful disobedience of any lawful judgment, order, mandate, writ, or process of court (La C.C.P. Art. 224(2)); specifically, Shunte King willfully interrupted the course of the November 14, 2024 hearing on a contempt of court charge lodged against her husband, plaintiff John Clifford J King. Shunte King willfully and knowingly and unlawfully called 911 in an effort to remove her husband, John Clifford J King from the courtroom while under direct examination by Judge Ronald C. Richard. Shunte King intentionally and willfully disrupted and interfered with court proceedings.

SIGNED this 15th day of November, 2024.

RONALD C. RICHARD
JUDGE, DIVISION B

A TRUE COPY
Date: 11-19-2024
Clerk

Gmail

True King <truekingfile@gmail.com>

From Judge Ronald C. Richard re: King Contempt of Court

Oliver Schrumpf <oschrumpf@schrumpf-law.com> Fri, Nov 22, 2024 at 11:58 AM
To: Kay Bang <kay.bang@lccitycourt.org>, <truekingfile@gmail.com>
Cc: KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>, Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

I do not represent Mr. King nor Mrs. King regarding any alleged contempt of court matter. My representation was strictly on the claim against Renee Amos. Please remove me from further correspondence on issues of contempt.

Oliver “Jackson” Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

[Quoted text hidden]

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

***Amended to include evidence of grounds for Judicial Intervention due to what appears to be efforts of judicial bias that may be known to Judge Richard. There have been repeated efforts to intimidate existing counsels, and dissuade new counsel from enrolling into the case by means of ex parte communications. Efforts to deny rights to legal counsel, documented multiple attorneys have attempted to enroll and have been dissuaded by the clerk's office with misleading rhetoric. Special privileges such as the attendance of Orelia Lawdins - Trent legal counsel for Charmaine Y. Colston whom I am a registered domestic violence victim and continue to suffer harassment and stalking examples of this are seen in the Court Records for case #23-2124 as Charmaine Y Colstons attorney said she could not be served as she was not party to the case however the documents she requested by conformed copy mailed to her are in fact grounds for adequate service as Charmaine Colston herself requested the documents. Her then attorney was allowed to attend closed proceedings for the trial on May 21, 2024 prior to a non related family court trial on May 25, 2024 and her presence was inaccurately not recorded into the record as required by law as all non interested parties were asked to be removed from the courtroom and she was not enrolled as council nor was she a witness and this violation was permitted .

Clerk's office denies ever speaking to any attorneys but their efforts to enroll have happened repeatedly since July and they were told Judge Richard is unhappy (refer to evidence and exhibit attached) please refer to documented emails and subpoenas that show at least 5 separate attorneys were either intimidated, told misinformation, told information with intent to dissuade enrollment. There is also the disregard of the untimely filed motions of Kamie Dominic on Oct 31, 2024 where she was required by law to serve concurrently upon both Judge Richard and the plaintiff John King Sr her motions and arguments and she did not. Counsel was allowed to make defamatory lies of infidelity in Kings marriage claiming involvement of a paramour where no such paramour exists. Refer to Louisiana legal definition of paramour, (current sexual / romantic nature person of interest or mistress) how can this be when King was cohabitating with spouse and married at the time the negligence and fraud by Amos occurred ? Additionally all ex girlfriends cannot be considered paramours and Colston is not the immediate preceding romantic partner prior to Kings spouse. If there was a paramour by legal definition it would apply to any persons of romantic nature prior to current spouse, and post any involvement with

on/ off again relationship with ex girlfriend Charmaine Y Colston. In addition Ms Dominic leaves room for misinterpretation as she makes a salacious claim of paramour without any relevance to the case. She screams that Amos' reputation deserves consideration yet it is unethical and she has no evidence of any paramour as King had not seen Colston in person for 13 months prior to transfer of his vehicle illegally. Im asking that this line of Kamie Dominic petition be stricken from the record as it creates risk for King in future legal proceedings that either his current wife, or ex girlfriend can use Dominics petition as proof of an existing Paramour during the marriage and depending on state in which possible divorce proceedings could be filed this could have detrimental financial damaging effects to King.

Lastly and most importantly after reviewing this case with hospital attorney, and the policy of SW Airlines, United Airlines, TSA, Port Authority and the laws of HIPAA and the additional medical procedural protections allowed by the state of New Jersey to seek legal injunction and or restraining order if evidence of violation of civil rights exists or any order by an out of state judge poses immediate threat to patients life or standard of care. Judge Richards inability to consider zoom appearance on an immobile plaintiff who cannot meet clearance standards to fly prior to November 13, 2024 as right now a no fly order is in place for John King due to spinal cord swelling resulting in temporary paralysis and seizure. The request by Judge Richard to appear only in person less than 24 hours after admission for follow up care as documented in the patient chart is not only unreasonable but unconstitutional and deadly. No reasons have been provided as to why Kamie Dominic had 6 months to file her motions timely and she did not file within the 15 day window and did not file concurrently as required by law. As a result this intruded on my right to legal counsel. She also served me on November 1 a legal holiday and I have 7 days from that date to have a motion for continuance received by the clerk's office and Tracking number says the wet signature motions were received timely as Nov 1 was a legal holiday in the state of Louisiana.

Additionally, on November 6, 2024 repeated efforts to reach Lake Charles City Court were prevented as the fax and phone lines were down per Dominic, Bash and my wife Shunte King made repeated attempts to contact and was denied on dates of deadline. Additionally this happened on Oct 31, 2024 and I had to send evidence to Monica Abshire via email to be time stamped in time with exhibits and this was not permitted as Monica Abshire claims she could not see attachments to the notarized petition.

At this time and the lack of a status conference or any audio or court transcripts from prior proceedings how can Plaintiff defend the untimely motions presented by Kamie Dominic as all of the evidence points to some sort of bias in the proceedings as “Renee doesn't have a pot to piss in” has taken priority of the life and civil rights of plaintiff John King and requires the intervention of Judge Richard to stop the influences coming from the clerks office as more than one attorney has sent email complaints of clerks office unwillingness to send case file information, unwillingness to act in a timely fashion, and an eager willingness to share Judge Richard position and emotion towards case # 23-2124 which would be grounds for mistrial with the addition of Orelia Lawdins - Trents presence in the court room being left out of the minutes for a

closed hearing as well as Charmaine Colston by order of conformed copy received appropriate service from the clerk's office.

Dear Honorable Judge Richard,
After repeated denials of due process, and several attempts to deny a fair and balanced trial, and repeated ex parte communications, lack of service, and overall what appears to be an effort to provide Renee Amos with a documented unfair judicial advantage it is now necessary to file evidence and petition ito the record for case number #23-2124 and to serve in proceedings for medical intervention protections for grounds for appeal and for out of state judicial proceedings including but not limited medical injunctions to prevent ordered removal from the States of New York and New Jersey for which NJ/NY Port Authority, TSA, and state transportation guidelines for disabled transport are in place that prevent the transport of John C King Sr plaintiff for means of medical emergency.

Additionally as per the evidence attached opposing counsel is being granted liberties that are in violation of due process and Judge Richards own legal precedent that does not permit untimely served motions and evidence to be permitted unto the record. Please refer to

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant’s recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Tracking # 9505514194044309 63

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the "interest of justice" standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant's Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received

notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant’s claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant’s motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the ____ day of _____, 2024, at _____ o'clock AM, Lake Charles, Louisiana.

_____
signature

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

STATE OF LOUISIANA
PARISH OF CALCASIEU

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical

4. Exhibits to accompany motion to intervene to protect civil rights.

John C King Sr
!!/5/2024

ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX -

DATE: 02/06/2025

From: Heather Goleman, Deputy Clerk
(337) 433-9403

SUBJECT: Louisiana 3rd Circuit - Case No. CW 25 00044
Lower Court Case No.: 2023-2124
Calcasieu
Fourteenth Judicial District C

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

To: Hon. Ronald C. Richard
Attorney at Law
330 Alamo Street
Lake Charles, LA 70601
Fax No. (337) 494-1793
Work No. (337) 494-1900

Oliver Jackson Schrumpf
Schrumpf & Schrumpf
3801 Maplewood Dr.
Sulphur, LA 70663
Fax No. (337) 625-8231
Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson Schrumpf	Counsel for: John Clifford J. King
Edward Kelly Bauman	Counsel for: Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, . . . on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider . . . motions [regarding pauper status]" *Mason v. Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v. Ferrington*, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of the order of appeal, the trial court does not have jurisdiction to hear the pro se

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0002/0003 F-327

motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

SJG JWP CD

SJG JWP CD

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0003/0003 F-827

ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX - ACTS FAX -

DATE: 02/06/2025

From: Heather Goleman, Deputy Clerk
(337) 433-9403

SUBJECT: Louisiana 3rd Circuit - Case No. CW 25 00044
Lower Court Case No.: 2023-2124
Calcasieu
Fourteenth Judicial District C

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

To: Hon. Ronald C. Richard
Attorney at Law
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Fax No. (337) 494-1793
Work No. (337) 494-1900

Oliver Jackson Schrumpf
Schrumpf & Schrumpf
3801 Maplewood Dr.
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Work No. (337) 625-9077
Counsel for: John Clifford J. King

Edward Kelly Bauman
LA Appellate Project
P. O. Box 1641
Lake Charles, LA 70602-1641
Fax No. (337) 491-0593
Work No. (337) 491-0570
Counsel for: Hartford Fire Insurance Company

STATE OF LOUISIANA

COURT OF APPEAL, THIRD CIRCUIT

NO: CW 25-00044

Judgment rendered and mailed to all parties or counsel of record on February 6, 2025.

JOHN CLIFFORD J. KING
VERSUS
RENEE AMOS NOTARY PUBLIC
ID #29374 AND HARTFORD
FIRE INSURANCE COMPANY

FILED: 01/28/25

On application of John Clifford J. King for Supervisory Writ in No. 2023-2124 on the docket of the Lake Charles City Court, Parish of Calcasieu, Honorable Ronald C. Richard.

Oliver Jackson Schrumpf	Counsel for: John Clifford J. King
Edward Kelly Bauman	Counsel for: Hartford Fire Insurance Company Renee Amos

Lake Charles, Louisiana, on February 6, 2025.

WRIT GRANTED. RELIEF GRANTED.

"The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, . . . on the granting of the order of appeal, in the case of a devolutive appeal." La.Code Civ.P. art. 2088. "Once the trial court granted the Relator a devolutive appeal and set the return date, it no longer had jurisdiction to consider . . . motions [regarding pauper status]" *Mason v. Hedrick*, 19-113, p.4 (La.App. 3 Cir. 4/17/19), 268 So.3d 1074, 1077-78. "Once the trial court signs an order for a devolutive appeal, it loses jurisdiction to entertain a motion to traverse the pauper status of a party." *Brack v. Ferrington*, 05-13, p.1 (La.App. 3 Cir. 2/16/05), 895 So.2d 617, 618. In the present case, an order of appeal was signed on December 3, 2024. The trial court was divested of its jurisdiction at that time. Accordingly, its decision to rescind Plaintiff's pauper status after that date was in error. That decision is hereby reversed.

Likewise, as the trial court was divested of its jurisdiction upon the signing of the order of appeal, the trial court does not have jurisdiction to hear the pro se

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0002/0003 F-327

motions filed by Plaintiff, which relate to the matter under appeal. Therefore, the trial court erred in setting those motions for hearing and ordering Plaintiff's counsel to appear. That decision is similarly reversed.

SJG JWP CD

SJG JWP CD

02-06-'25 09:06 FROM- Third Circuit Court 337-491-2590 T-291 P0003/0003 F-827

COURT OF APPEAL

THIRD CIRCUIT

STATE OF LOUISIANA

NO.

JOHN CLIFFORD J. KING

Plaintiff/applicant

VERSUS

RENEE AMOS and HARTFORD FIRE INSURANCE COMPANY

Defendants-respondents

APPLICATION FOR WRIT OF REVIEW TO THE THIRD CIRCUIT
COURT OF APPEAL

NO.

FROM THE WARD 3 / LAKE CHARLES CITY COURT PARISH OF
CALCASIEU, STATE OF LOUISIANA NO. 23-2124

HONORABLE RON RICHARD, PRESIDING

ORIGINAL APPLICATION AND BRIEF OF PLAINTIFF- APPLICANT,
JOHN CLIFFORD J. KING,
FOR WRIT OF REVIEW TO THE LAKE CHARLES CITY COURT And REQUEST FOR EXPEDITED CONSIDERATION And STAY

A CIVIL CASE

Respectfully
submitted:

Oliver Schrumpf

Oliver "Jackson" Schrumpf"
Attorney for Applicant
3801 Maplewood Drive
Sulphur, LA 70663
Phone: (337) 625-9077
Appeal Counsel
Bar Roll No. 11832

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I. APPLICATION FOR WRIT OF CERTIORARI

The application of JOHN CLIFFORD J. KING, plaintiff, and Oliver Schrumpf, Attorney, respectfully represents:

A. Applicant is aggrieved by the orders of the Honorable Ronald Richard, Ward 3 / Lake Charles City Court Judge on December 30, 2024 and applicant *is* entitled to have this honorable court grant a supervisory writ to review and reverse those orders.

B. A statement of the considerations required by Rule 4-5 C. of the Uniform Rules of Courts of Appeal, a memorandum setting forth the statement of the case, an assignment of errors, a summary of the argument, and an argument addressing the assignments of error on the facts and law; a verification of the application, and appendix containing the requisite

exhibits, are all annexed here and made a part of this application.

A request for expedited consideration and stay of proceedings pending decision is attached.

Wherefore, applicant prays that after due consideration, in the discretion of this honorable court, that a supervisory writ be granted, and that thereafter the orders of the Ward 3/ Lake Charles City Court aggrieving applicant be reversed:

A. Reinstating the pauper status of John Clifford J. King, Plaintiff;

and

B. Staying further hearings pending the devolutive appeal.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF Attorney for applicant

Sworn to and subscribed before me this

Bla ne

Notary Public

Jinhifer L. LeBlanc
Notary No. 55493

23rd day of January, 2025.

REQUEST FOR EXPEDITED CONSIDERATION AND STAY OF PROCEEDINGS

The Trial Court has granted a stay suspending the Court's Order for counsel to appear on January 15, 2025 to represent John King and/or Shunte King in matters set by the Court for hearing (contempt and hearings on the motions filed by King In Proper Person), but counsel prays that this Court of Appeal grant expedited consideration of this application and stay all trial court proceedings pending decision on this application and eventually the devolutive appeal.

The trial Court's sua sponte retroactive rescission of its pauper order in this case will prevent the pauper plaintiff, John King, from pursuing a devolutive appeal unless this application is granted and the trial court order is reversed.

Additionally, the trial court is attempting to exert its control over the plaintiff (and plaintiff's spouse) who reside in New Jersey, by ordering local

counsel to appear at hearings for which Counsel does not represent the plaintiff and for which counsel will not be compensated.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

II. STATEMENT OF THE CONSIDERATIONS WARRANTING THE GRANTING OF WRITS

A. **Orders issued after jurisdiction divested.**

A judgment was rendered on November 14, 2024, after trial on the merits. The judgment denying all of plaintiff's requested relief was signed on November 21, 2024.

In

An order of appeal was entered on December 3, 2024 granting a Devolutive appeal from the Judgment dated November 21, 2024. accordance with La. C.C.P. 2088, jurisdiction is "divested" except for certain limited exceptions (none pertinent here). On December 30, 2024, the Court issued orders not allowed under La. C.C.P. 2088.

(1) Retroactively rescinding the Order granting plaintiff Pauper status, and

(2) Ordering Oliver Schrumpf to represent the plaintiff in contempt proceedings for pleadings and communications made by plaintiffs with court personnel before and after the appeal was entered.

B. **Interference with Attorney-Client** contract.

Despite the jurisdiction of the Court being divested, the Trial Court ordered counsel for John King in the primary case (King vs Amos and Hartford) to appear on December 30, 2024 without any advance notice of what issues were to be heard; and then on December 30, 2024 ordered counsel to appear again on January 15, 2025, [Apparently, post trial, John King filed pleadings In Proper Person after the trial court jurisdiction was

divested and the Court wants to hold King in Contempt for the allegations

being made by King or the Court wants counsel to represent King in the claims King made In Proper Person. [The trial Court should have merely declined to take any action since its jurisdiction is divested.] Counsel only represents John King on the claim against the Notary and her bonding company for executing a bill of sale when John King was in New Jersey or New York and not present in Lake Charles, La. Counsel has advised King to retain separate counsel for any contempt proceedings. But since King continues to reside in New Jersey, the Court is attempting to gain control over King through counsel in the core case. Counsel has less control over the actions of John King than the Court does.

C. **Sua Sponte Rescission of In Forma Pauperis order**.

Not only was jurisdiction of the Trial Court divested by the appeal

order, but the Trial Court then, without notice or contradictory hearing, announced that the Court was Sua Sponte Rescinding the previous order granting pauper status. The Court claimed grounds as Mr. King's spouse is not a "third party" suitable to sign the affidavit of poverty. {But see La. C.C.P. 5183, prohibiting only the party's **attorney** from signing as the third party.} The Trial Court also made reference to some out of court communication by King about attorney fees, but without advance notice, no opportunity for meaningful response was granted to plaintiff. The effect of rescinding pauper status is to require plaintiff to pay thousands of dollars in Court fees immediately in order to have the Trial Court's decision reviewed by the Court of Appeal, effectively denying plaintiff an appeal. Additionally, the Court is ordering counsel to represent King in matters that

counsel has not been retained to represent King in. This is taking time and

effort of counsel without compensation.

C. Why expedited granting of writs is appropriate in this case.

Plaintiff fully intends to pursue the devolutive appeal on the merits of

this case and believes that upon review, the Trial Court decision will be

reversed. However, the actions of the trial court, taken after jurisdiction

was divested, effectively deny plaintiff a right of appeal.

CONCLUSION:

The decisions of the Trial Court made on December 30, 2024 should be reversed:

A. John King's Pauper Status should be maintained.

B. Oliver Schrumpf should be relieved of the Order that he represent John King in contempt proceedings, or in issues filed In Proper Person by King after jurisdiction divested.

C. Further proceedings in the trial court should be stayed while the matter is heard by the Court of Appeal.

III. MEMORANDUM OF LAW

A. Statement of the Case and Prior Proceeding

FACTS:

John Clifford J. King contacted Oliver Schrumpf on October 31, 2024 requesting Schrumpf represent him in a case against a Louisiana Notary (Rene Amos) who had notarized a vehicle transfer of King's vehicle on September 7, 2021 at a time when the owner of the vehicle (John King) was out of the state of Louisiana (in New Jersey or New York). King e-mailed a

copy of the petition and a copy of the investigation report from the Calcasieu Parish Sheriff's office to Schrumpf. On November 6, 2024, Schrumpf agreed to represent King in the matter against the Notary. On November 7, 2024 Schrumpf filed a Motion to Enroll and a Motion to Continue the case (then set for trial on November 14, 2024). The trial court ordered Schrumpf to appear for a hearing that day (November 7, 2024) before authorizing the enrollment. Judge Ron Richard advised Schrumpf that John King had been filing ex parte communications with the Court making allegations that the Court did not appreciate and that the case had

been set for trial several times. The Court granted the enrollment but denied the Motion to Continue and confirmed that trial would occur on November 14, 2024. The Court also denied a request for plaintiff to appear via Zoom unless he could provide to the court an excuse signed by a physician by Monday, November 11, 2024 (*a* judicial holiday). Schrumpf advised his client that he must obtain a signed excuse from a doctor and have it to the Court by Monday, November 11, 2024 or make arrangements to be present for trial on November 14, 2024. The Court and Schrumpf's office were closed November 11, 2024 (Veteran's Day). King e-mailed a document signed by a doctor to the court on November 11, 2024, but, despite a back condition, managed to fly from New Jersey to Lake Charles to be present for the trial. The trial court found that Mr. King in deed was not in Lake Charles on the date the notary claimed she notarized his signature, but the court ruled against Mr. King on November 14, 2024, and signed a judgment denying his claim on November 21, 2024. The result of the trial is the

subject of a devolutive appeal granted December 3, 2024. However, this present Writ Application involves the Court's order for Schrumpf to appear for a hearing on December 30, 2024 after jurisdiction of the trial court had divested, and the Court's Sua Sponte rescission on December 30, 2024 of the Pauper Order previously entered in the case.

IV. ACTIONS BELOW:

A. On December 30, 2024, the Trial Court SUA SPONTE and without prior notice, rescinded its prior order granting pauper status to John King. This in effect denies King's right to appeal the decision on the merits of the case unless he can find several thousand dollars to pay costs within 20 days.

B. On December 30, 2024, the Trial Court Ordered Oliver Schrumpf to represent John King in contempt proceedings for filing of ex parte pleadings with the Lake Charles City Court on December 12, 2024 or at trial of the issues raised by those pleadings. The pleadings were filed by John King via e-mail. Even though King copied the pleadings to Schrumpf, Schrumpf neither assisted,

counseled, or even knew that the pleadings were being prepared or filed by King. Schrumpf did not contract to represent King on contempt charges or on the clams raised in those pleadings, and after the claims were brought to Schrumpf's attention by the Court, Schrumpf advised King he should contact an attorney with criminal law expertise to represent him on the contempt counts.

Schrumpf does not hold himself out as current in practicing criminal law.

V. SPECIFICATIONS OF ERROR AND ISSUES FOR REVIEW

A. The Trial Court erred in taking action after trial court jurisdiction divested to retroactively rescind the Pauper status of John King, thereby depriving the pauper plaintiff of a right of devolutive appeal.

B. The Trial Court erred in ordering attorney Oliver Schrumpf to defend

John King on charges for contempt of court or to try allegations raised in pleadings filed by John King In Proper Person which were done without knowledge, assistance, or counsel of attorney Schrumpf.

VI. SUMMARY OF ARGUMENT

A. **Pauper Status:** Jurisdiction of the trial court divested on December 3, 2024 with the granting of the devolutive appeal [See Order Granting Appeal, Appendix C and La. C.C.P. 2088]. Thereafter the trial court did not have jurisdiction to order counsel to a hearing on December 30, 2024 or to SUA SPONTE retroactively rescind the order granting pauper status to John King. {See transcript December 30, 2024, p. 21} Furthermore, the Court's reasoning for rescinding the Pauper Order was erroneous: Mrs. King is not a "third party disallowed from signing as an affiant". See La. C.C.P. 5183 A. (2). Additionally, the Court may only reconsider its original order granting the application "in a contradictory hearing" [La. C.C.P. 5183 B.

(3)]. This process would require notice and an opportunity to prepare for the hearing, which did not occur on December 30, 2024.

B. **Ordering Counsel to represent Mr. King in a Contempt Proceeding.**

When John King sent an e-mail to the Lake Charles City Court on December 12, 2024 (and copied the e-mail to Oliver Schrumpf), the Court was upset with Mr. King's conduct and wanted to punish him, but the Court did not have jurisdiction to entertain Mr. King's pleadings. The proper action of the Court would have been to decline to take any action on the pleadings until jurisdiction is returned to the trial court. Instead, the Court ordered Oliver Schrumpf to appear on December 30, 2024 and on that date, the Court Ordered Oliver Schrumpf to appear January 15, 2025 to defend John King on contempt charges and/or to represent Mr. King on the matters in his December 12, 2024 In Proper Person pleadings. Oliver Schrumpf did not counsel Mr. King to file the December 12, 2024 pleadings, did not prepare the pleadings, did not sign the pleadings, and did not know that Mr. King had in mind to file the pleadings. More importantly, Oliver Schrumpf did not contract to represent Mr. King on any of the claims made in his December 12, 2024 filing. The Court Ordering Oliver Schrumpf to pursue

claims on behalf of John King that Schrumpf did not contract to perform exceeds the authority of the Court. When jurisdiction is returned to the trial court, the Court may set *a* hearing and notify John King of the hearing date and if Mr. King appears in person or hires an attorney to represent him, the Court may then make rulings on Mr. Kings' pleadings as appropriate.

Oliver Schrumpf should not be commanded to use his time and effort to pursue matters he did not undertake in his agreement with Mr. King.

VII. ARGUMENT AND LAW

A. THE TRIAL COURT'S JURISDICTION OVER THE CASE DIVESTED WHEN THE ORDER OF DEVOLUTIVE APPEAL WAS GRANTED ON DECEMBER 3, 2024.

See Order granting Devolutive Appeal. Appendix C.

La. C.C.P 2088 provides:

Art. 2088. Divesting of jurisdiction of trial court

A. The jurisdiction of the trial court over all matters in the case reviewable under the appeal is divested, and that of the appellate court attaches, on the granting of the order of appeal and the timely filing of the appeal bond, in the case of a suspensive appeal or on the granting of the order of appeal, in the case of a devolutive appeal. Thereafter, the trial court has jurisdiction in the case only over those matters not reviewable under the appeal, including the right to do any of the following:

1433.

2125.

(1) Allow the taking of a deposition, as provided in Article

(2) Extend the return day of the appeal, as provided in Article

(3) Make, or permit the making of, a written narrative of the facts of the case, as provided in Article 2131.

(4) Correct any misstatement, irregularity, informality, or omission of the trial record, as provided in Article 2132.

(5) Test the solvency of the surety on the appeal bond as of the date of its filing or subsequently, consider objections to the form, substance, and sufficiency of the appeal bond, and permit the curing thereof, as provided in Articles 5123, 5124, and 5126.

(6) Grant an appeal to another party.

(7) Execute or give effect to the judgment when its execution or effect is not suspended by the appeal.

(8) Enter orders permitting the deposit of sums of money within the meaning of Article 4658.

(9) Impose the penalties provided by Article 2126, or dismiss the appeal, when the appellant fails to timely pay the estimated costs or the difference between the estimated costs and the actual costs of the appeal.

(10) Set and tax costs, expert witness fees, and attorney fees. (11) Certify a partial judgment or partial summary judgment in accordance with Article 1915(B).

(12) Amend a judgment to provide proper decretal language under Article 1918 or 1951.

B. In the case of a suspensive appeal, when the appeal bond is not timely filed and the suspensive appeal is thereby not perfected, the trial court maintains jurisdiction to convert the suspensive appeal to a devolutive appeal, except in an eviction case.

Amended by Acts 1964, No. 4, §1. Acts 1968, No. 128, §1. Acts 1977, No. 175, §1, eff. Jan. 1, 1978. Acts 1983, No. 126, §1; Acts 2008, No. 658, §1; Acts 2021, No. 259, §2.

Accordingly, the Trial Court had no authority to Sua Sponte rescind the In Forma Pauperis Order previously granted in the case, nor to Order Oliver Schrumpf to appear at hearings or to defend John King on contempt charges or pursue Mr. King's In Proper Person filings which occurred after the Court's jurisdiction had divested. The trial court should have simply declined to take any action on the In Proper Person pleadings filed by Mr. King after jurisdiction divested.

Alternatively, even if this Court finds that the trial court retained jurisdiction to reconsider the granting of the application for pauper status, the Court's ruling should be reversed because: the grounds stated are contrary to law: [Transcript of December 30, 2024 p. 21 the Court found that Mrs. King was "not a third party" as required by La. C.C.P. 5083]. In fact, La. C.C.P. 5083 A. (2) specifically states: "the affidavit of a third person other than the applicant's attorney...". Therefore, a spouse qualifies to sign the affidavit of poverty unless she is also "the applicant's attorney".

Finally, even if the Court of Appeal does not find fault with any of the foregoing, the statute allows the court to reconsider its original order

"on its own motion at any time **in a contradictory hearing.**" {La. C.C.P. 5083 B. (3). A contradictory hearing would provide notice and an opportunity to be heard which did not occur on December 30, 2024. Had there been notice of the issues to be considered (including reconsideration of pauper status), counsel may have been able to offer evidence to contradict the Court's claims. For instance, Mr. King did not have $12,000 to pay attorneys. But Mr. King may have received grants from civic organizations to help him pay attorneys because of the wrongs which had been done to him when his vehicle was stolen and a Louisiana Notary purportedly notarized his signature on September 7, 2021 at a time when Mr. King was in New Jersey or New York.

CONCLUSION

This application for supervisory writs should be granted to reverse the orders of the trial court on December 30, 2024: A. Retroactively rescinding the Pauper Status Order previously granted to John King; and B. Ordering Oliver Schrumpf to appear and represent John King on contempt or other matters raised in In Proper Person pleadings filed by John King after the Court's Jurisdiction had been divested.

Respectfully submitted by Attorney for Applicant, JOHN CLIFFORD J. KING and his attorney, Oliver Schrumpf

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF, Appeal Counsel

Bar Roll No. 11832

3801 Maplewood Drive

Sulphur, LA 70663

Phone: (337) 625-9077

VERIFICATION

I certify that the allegations in the foregoing application for writ of certiorari are true and correct, to the best of my knowledge, information, and belief, and that a copy of this application has been delivered to the Trial Judge, Ron Richard, via e-mail ron@lccitycourt.org

Date

and to the below listed counsel for defendant:

Ed Bauman via e-mail ed@lakecharlesattorney.com

Oliver Schrumpe

OLIVER "JACKSON" SCHRUMPF

•23rd

Sworn to and subscribed before me this

Leb

lon

Jinnifer L. LeBlanc
Notary No.
55493

Notary

day of January, 2025.

CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing Application for Writ of Review and for Stay has been served on the presiding trial judge and all opposing counsel, by depositing a copy in the U.S. Mail, postage prepaid, properly addressed to all counsel, and to the Third Circuit Court of Appeal, to wit:

Third Circuit Court of Appeal
Judges
P.O. Box 16577
Lake Charles, Louisiana 70616
by Hand Delivery

Ed Bauman
Counsel for Defendants,
Amos and Hartford
Lake Charles, La. 70602-3010
Via e-mail: ed@lakecharlesattorney.com

Judge RON RICHARD
ron@lccitycourt.org
Judge, Ward 3/Lake Charles City Court

Thus done at Sulphur, La. This 24 day of January, 2025.

Oliver Schrumpf

OLIVER "JACKSON" SCHRUMPF

APPENDIX

TAB #

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A. Final Judgement November 21.2024 19-20

B. Motion for Devolutive Appeal 21

C. Order granting Devolutive Appeal December 3, 2024 22-23

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E. Motion to be Excused from Hearing denied by Judge 29-30

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MinuteID: 1869063

JOHN CLIFFORD J KING

STATE OF LOUISIANA, PARISH OF CALCASIEU CITY
COURT OF LAKE CHARLES

Vs. No.
23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 2937

You are hereby notified that a:

NOTICE OF

JUDGMENT

TO: **John** Clifford J King

Thru: Attorney Oliver Jackson Schrumpf
3801 Maplewood Drive
SULPHUR, Louislana

of said **Parish** Calcasieu

JUDGMENT

has **been** filed on

11/21/2024

11/19/2024

and signed by Judge Judge
Richard

.on.

in the above numbered and entitled cause as per certified copy attached heret

Witness the HONORABLE JAMIE B. **BICE** RONALD C. RICHARD**, Judges** of said **Court**,

this 21 day of November 2024

май

TRUE **COPY**

Deputy Clerk of **Court**

23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that Notice of Judgment was mailed to the plaintiff, John Clifford J King through attorney Oliver Jackson Schrumpf and to defendant, Renee Amos through attorney Kamie T. Dominic this 21st day of November 2024.

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CLER K

Ronald G. Richard

10 11-21-2004

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JOHN CLIFFORD J KING

:

RECD LG CITY COURT CIV

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LAKE CHARLES CITY COURT

VS. NO. 23-2124

RENEE AMOS
NOTARY PUBLIC
NOTARY ID #29374

FILED:
11-19-2014

PARISH OF CALCASIEU

STATE OF LOUISIANA

JUDGMENT

Malini

DEPUTY CLERK OF COURT

This matter came before this Honorable Court on November 14, 2024, pursuant to a *Petition for Damages and Award for Negligence* filed by JOHN CLIFFORD J KING in the above-captioned matter. Present in Court were JOHN CLIFFORD J KING, **and** his attorney, Oliver Jackson Schrumpf, and RENEE AMOS, and her attorney, Kamie T. Dominic.

After consideration of the law and evidence, inclusive of the pleadings, testimony of witnesses, and statement of counsels, the Court finds that the Plaintiff, JOHN CLIFFORD J KING, failed to prove by a preponderance of the evidence that the Defendant, RENEE AMOS, engaged in any incorrect or improper conduct in processing

this matter and for reasons orally assigned, entered the following judgment:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that there be judgment herein in favor of RENEE AMOS, and against Plaintiff, JOHN CLIFFORD J. KING, dismissing the petition with prejudice, all costs be assessed to the Plaintiff, JOHN CLIFFORD J KING.

JUDGMENT RENDERED in Open Court on November 14, 2024; JUDMENT READ and SIGNED this 21st day of November 2024, in Lake Charles, Calcasieu Parish, Louisiana.

RON RICHARD, JUDGE DIVISION B JUDGE, LAKE CHARLES CITY COURT

Ronald G. Richard

AY QUE COPY 1846
1-21-2004
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Chork

JOHN CLIFFORD J KING

VERSUS NO. 2023-2124

WARD 3/LAKE CHARLES CITY COURT

PARISH OF CALCASTEU

RENEE AMOS NOTARY PUBLIC ID #29374

STATE OF LOUISIANA.

FILED:

122-2034

Malekin

DEPUTY CLERK OF COURT

MOTION AND ORDER FOR DEVOLUTIVE **APPEAL**

ON MOTION OF Oliver "Jackson" Schrumpf, counsel for John Clifford J King, plaintiff

herein, for a devolutive appeal from the judgment rendered November 14, 2024, read and signed

November 21, 2024**,** notice of which was mailed November 21, 2024, and from the judgment

(Ruling") denying plaintiff's claims against Renee Amos.

IT IS ORDERED that a devolutive appeal be and is hereby granted to John Clifford J King

and that the appeal be returnable to the Court of Appeal, Third Circuit, State of Louisiana, at Lake

Charles, Louisiana, upon payment *of* costs in accordance with law.

SO ORDERED *this* 3rd day of Decendo 2024, in Lake Charles,

Calcasieu Parish, Louisiana.

Prepared by:

JUDGE ROR RICHARD

Ronald G. Richard

BY:

Oliver

Schramgez

OLIVER JACKSON" SCHRUMPF #11832
SCHRUMPF LAW OFFICE,
A Professional Law
Corporation
3801 Maplewood *Drive*
Sulphur, Louisiana
70663
(337) 625-9077; Fax (337) 625-8231
oschrumpf@schrumpf-law.com

*:
.

12-3-2004 Math

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

FILED:
12/5/2004

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU

STATE OF LOUISIANA

Kinky Bay

DEPUTY CLERK

ORDER

Considering the petition for devolutive appeal wherein JOHN CLIFFORD J

KING was granted a devolutive appeal from the judgment rendered in the above entitled and numbered cause, returnable in the Court of Appeal, Third Circuit, State of Louisiana, on the 16th day of January, 2025.

Lake Charles, Louisiana, this 5th day of December, 2025.

RONALD RICHARD
CITY JUDGE,
DIVISION B

Suit No. **23-2124**

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a certified copy *of* the Motion and Order for Devolutive Appeal signed by Judge Ronald C. Richard has this 3rd day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

Malkie

CLERK

John C. J. King Sr.

Vs. No. 23-2124

Renee Amos

1-30.2024

FILED

LAKE CHARLES CITY COURT

WARD THREE

CALCASIEU PARISH

STATE OF LOUISIANA

жавий

TY CLERK OF COURT

In *Forma Pauperis* AFFIDAVIT

All questions must be answered in full.
Clients **of** Federally Chartered Legal **Services Corporations** only answer questions **1-8 and 11-13.**

1 Full Name John **C.** J. King Sr

Social Security No. 1934

Date of Birth 04-17-1986

Ser M

2. Address 123 N. Louisiana Ave. Lake Charles, LA

(Box **No.** or Street **Address)**
(**City**)

3. Telephone **No(s).**
318-995-1705

(Home**)**

(State and Zip **Code**)

(**Work**)

4. Are you a student**?** yes

If **so,** please indicate the name of the school **you are** attending**: Essex** Vocational and Technical

5. What is your occupation**?** Temoirary Disabled UnemploymentAre you employed**?** 6. **Injured**

Name of your employer
Address

None

N/A

How long have you been **so employed?**

Telephone No.

If unemployed, list the name of your last **employer** ETC If unemployed**,** how long have you been unemployed

6 Months

Monthly Wages

Federal Income **Tax 14944**

6. Income: Weekly Wages $0

$0

Monthly deductions:

Employer's

FICA

Other

deductions

Any others.

Încome

Is your income **less** than or equal to 125**%** of **the** federal poverty level**? yes**

7. Marital Status:

Single___Married

Separated_

How many children do you support who are under **18?** 3 How many children live with **you?** 2

Do you have **any** other dependents**?** relationship:

ELECTRONIC

FILE DATE:

7-30-2004

Divorced Widowed Concubine

State names, ages, and

24

Jayla King:15;daughter / **John** King Jr;14**;son /** Jakai King,**5;son**

Is your spouse employed**? No** spouse's **employer**

Graduate Student Spouse's
employer's address N/A
Telephone No. 318-995-1705

If so, please indicate the name **of** your

Wages**:**
Weeklys

Monthly **S**

8. Do you or your spouse receive any **of the following** income or **support?**

If so, please state the monthly amount:
SSIO
TANFO
Child support
Disability **0**
Workers **comp**
0
Rent Supplement ©
Unemployment benefits
Food **stamps**

9. **Do you own or** have **an** interest in any **of** the following**?** (Including community **property)**

House o
Value $0

Balance **owed** $0

Auto 0

Value $0

Balance owed $0

Truck **0**

Value $0

Balance owed 30

Watercraft

Value $D

Balance owed **$0**

Livestock 0

Value $0

Balance owed **$0**

Machinery

Value $0

Balance owed $0

Stock

Value **$0**

Bonds

Value $0

Certificates of Deposit

Value $0

Other immovable **property 2**

Equity $**0**

Debt $0

Value $0

Bank account

Name and location of bank**:**

Capital One

10. Please list your monthly expenses:

Rent 1600 Student Lot rent

Garbage

Electric 200

Medical expenses

Water Property taxes

House note

Telephone **90**

House ins.

Gas

Dental expenses_

Life ins.

120 Monthly Car note

Food

Barber/beauty

Car ins Entertainment

Cable

Med. ins.

Prescriptions

Transportation_

Child support_

Daycare

Cleaning **supplies**/toiletries

Support for children other than those of this marriage

Credit cards (List type of card and monthly payment**)**

Other

Garnishment

Discover			
Mastercard			
Visa			
Visa			
	$15500		
	$ **4000**		
	$ **2000**		
	$ 1800		
		200	
		150	
		220	
		140	

Loans **(**List the financial institution **and the** amount **you** pay monthly**)**

TOTAL MONTHLY EXPENSES **$ 2820**

$

$

11. **Does** anyone regularly help you pay your **expenses?** no

person's name and relationship to you N/A

If so, please state that

Do you have **any** additional income or assets that are not shown above**? If so**, please explain_

N/A

12. What arrangements have you made to **pay** your attorney's fee and what amount, **if** any have you paid**? (You** are required to answer fully**.)**

Pro-Se

13. Has your attorney **explained to** you that it is a crime punishable by imprisonment to intentionally give a false answer to any **of** the above questions**?** yes

State of Louisiana, **Parish** of **Calcasieu**

BEFORE ME, personally came and appeared_

who **after** being duly sworn, deposed and said that:

John C. 3'

Kiay SR

(S)he is a citizen of the United **States** of America **and** is presently **domiciled** in **and a** resident of Louisiana.

(S)he is the person who furnished the information **above**; **that (s)he** has signed the petition**;** that the information is furnished to the court for the purpose **of** requesting permission to litigate the **above** captioned lawsuit without **paying** the costs in advance or as they accrue or furnishing security therefor**.**

That the foregoing petition and that all allegations of fact therein contained **are** true and correct**;** and that because of his/her poverty and want of means**, (s)**he is unable to pay the costs of court in advance or as they accrue, nor is (**s**)he able to provide bond therefor.

3/

Applicant's Signature

NOTICE

Although you may be granted **the** privilege of proceeding without **prepayment of** costs, should judgment **be** rendered against you, YOUR **STATUS** AS A **PAUPER** DOES NOT RELIEVE YOU OF THE OBLIGATION TO PAY THESE COSTS.

The privilege to proceed **In** Forma Pauperis is restricted to litigants who are **clearly** entitled to do so, with due regard to the nature of the proceeding, the court costs which otherwise

would have to be **paid**, and the ability of the litigant to pay them ro **to** furnish security therefor, so that the indiscriminate filing of lawsuits may be **discouraged,** without depriving a litigant of the benefit of proceeding In Forma Pauperis **if (s)**he is entitled to **do**

SWORN **TO** AND SUBSCRIBED BEFORE ME, **a Notary Public in** Hudson County

Louisiana, this

New

Jersey

IMPRM MA

30

day of

ERDE WARDR, MA

20 24

Sale Medicum

Notary **Public**

THIRD PARTY AFFIDAVIT

The BEFORE ME, personally come and appeared Muple Jover King

who after being sworn, deposed **and** said **that (s)he knows** con CT hey ! well and that (s)he knows that because of his/her poverty **and** want of means, **(she** is unable to pay the costs of court in advance or as they accrue, nor is **(s)he** able to **provide** bond therefor.

JAKE **G** MULRENAN Notary **Public**, State of New Jersey Comm. **#50215247**
My Commission Expires
10/16/2028

Afiíap
t

SWORN TO AND SUBSCRIBED BEFORE ME, a Notary Public in

Hudson County

Lonistama, **this**

20

24. New

Jersey

30m

Notary Public

day

of

July

JAKE G MULRENAN
Notary Public, State **of** New Jersey Comm. # 50215247
My Commission Expires 10/16/2028

LEGAL SERVICES DECLARATION

BEFORE ME, personally came and appeared

who is a duly authorized representative of Acadiana Legal Services Corporation or Southwest Louisiana Legal Services, or a pro bono program receiving referrals from **one of** the aforementioned organizations, states that

has

produced evidence that (s)he **receives** public assistance benefits, or that **(s)he** has qualified to receive free legal services based on his/her income being **less** than or equal to **125**% of the federal poverty level and therefore is entitled to a rebuttable presumption that **(s)he is** entitled to the privilege of litigating without prior payment **of** costs.

Legal Services Representative

ORDER

Considering the foregoing petition and

affidavits:

IT **IS** HEREBY ORDERED that

be permitted **to** prosecute or defend this litigation in accordance with Louisiana Code of Civil Procedure Article **5181,** without **paying the** costs in advance or as they accrue or furnishing-**security** therefor.

Signed this
chambers

13th day
ading 2024

Lake Charles, Louisiana.

Ronald C. Richard

A TRUE COPY
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10-2015

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Clerk

FAX COVER SHEET

TO

COMPANY

FAX NUMBER

FROM

DATE

RE

COVER MESSAGE

Pauper **Affidavit**

Attn **Clerk** of Court

13374911303

John **King**

2024-05-20 20:56:37 GMT King vs **Amos 23-2124**

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IN RE: JOHN CLIFFORD J. KING

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REC'D LC CITY COURT CIV.
$24 DEC 19 PM2:29

Lake Charles City
Court

Calcasieu Parish,
Louisiana

TACT

Deputy Clerk of
Court

MOTION TO BE EXCUSED FROM **HEARING**

Now comes Oliver "Jackson" Schrumpf, attorney, individually, who respectfully shows:

1. On November 7, 2024, Movant enrolled as attorney for John King in the matter

entitled John King vs. Rene Amos, No. 2023-2124, Lake Charles City Court.

2. The King vs Amos matter was tried on November 14, 2024.

3. Judgment was signed in that matter **on** November 21, 2024 and Notice of Judgment

was mailed by the Clerk on the same day.

4. An order granting a devolutive appeal of that judgment was granted on December 5,

2024.

5. In accordance with La. C.C.P. Art. 2088. Divesting *of* jurisdiction of trial court:

on

A. The jurisdiction **of the** trial court **over all** matters in the case **reviewable**

under **the appeal** *is* divested, **and that** of the **appellate** court **attaches,**

the granting of the **order of appeal**, in **the case of a** devolutive **appeal**.

Thereafter, the trial court has jurisdiction in the case only over those matters not

reviewable under the appeal, including the right to do any of the following: (none

applicable in this
case).

6. Jolm King has subsequently filed other pleadings in Lake Charles City Court and

John King, and his wife, have been cited to appear in other matters not involving the

Judgment subject to appeal. (Even if the wording of the pleadings filed by King was

vague or ambiguous, or even if it intended to refer to the judgment in 2023-2124,

regardless, the Court would not have jurisdiction to take any action on that particular

matter because the jurisdiction of the Court is
"divested").

7. Oliver "Jackson Schrumpf does not represent the John King or Shunte King in the

contempt matters or any other matters other than the devolutive appeal in King vs.

Rene Amos, No. 2023-2124.

8. On December 18, 2024, after e-mail exchanges by the Judge's paralegal and Oliver

Schrumpf, the Court, Judge Ron Richard, called Oliver Schrumpf and, by telephone, ordered Schrumpf to appear at a hearing on December 30, 2024 at 9:00 AM. Schrumpf protested that he does not represent the Kings on the newly filed pleadings

or on the contempt matters. Judge Richard, nevertheless said that the King pleadings

sought recusal *of* the judge as to all judgments, which Judge Richard believes means

even the judgment described in paragraph 3 above.

9. As attorney for John King in the King vs. Rene Amos, No. 2023-2124, Oliver

Schrumpf here shows that the trial court's jurisdiction over that judgment has been

divested and no action can be taken as to that judgment by the trial court.

Accordingly, Oliver Schrumpf requests the Court rescind its order for Oliver

Schrumpf to appear on December 30, 2024 and excuse Oliver Schrumpf from

appearing, reserving to John King the right to retain other counsel to represent him in

that matter.

Respectfully Submitted
By

SCHRUMPF LAW OFFICE,
A PROFESSIONAL LAW CORPORATION

BY:

Olien
Schrumpf
OLIVER JACKSON" SCHRUMPF
LA Bar Roll No. 11832
3801 Maplewood
Drive Sulphur, LA
70663 Tel-337/625-9077
Fax-337-625-8231
oschrumpf@schrumpf-law.co
m

ORDER

Considering the foregoing Motion, let OLIVER "JACKSON" SCHRUMPF be excused from

SCH

RU

appearing at the hearing currently fixed *for* December 30/2024 at 9:00 AM.

SIGNED in Chambers in Lake Louisiana, on this day of

Decembe

r

2024.

RON RICHARD, CITY JUDGE

Suit **No. 23-2124**

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARÍSH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a copy of the Motion To Be Excused From Hearing DENIED by Judge Ronald C. Richard has this 27 day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

Mechani

CLERK

i

MINUTES OF THE COURT

JOHN CLIFFORD J KING

VS. NO. 23-2124

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

DECEMBER 30, 2024

JUDGE RONALD C. RICHARD

Monica Abshire, Clerk

Arnold Bellow, Bailiff

Plaintiff, John Clifford J King, appears through attorney, Oliver Schrumpf

Defendant, Renee Amos Notary Public Notary *ID*# 29374 and Hartford Fire Insurance Company, appears through attorney Edward Bauman

COURT RULING:

The Court ruled that the four (4) motions filed by plaintiff John Clifford J King (not through *his* attorney) are fixed for hearing on Wednesday, January 15, 2025 at 9:00 a.m. and notice given to all parties in open court. The motions are: (1) Plaintiff's Emergency Motion to Recuse/Remove Honorable Judge Ron

Richard; (2) Plaintiff's Motion to Vacate Retaliatory Judgments; (3) Plaintiff's Motion to Strike and Seal Identifying Information from Public Record; and (4) Plaintiff's Motion to Intervene to Prevent Further Judicial Harassment and Loss of Life.

The Court ordered plaintiff's counsel, Oliver Schrumpf, to provide the plaintiff's New Jersey address to be sealed in an envelope for the Court only. Upon review of the address provided by Mr. Schrumpf, the Court rescinds the order as the address provided is already in the record (plaintiff's address on N. Louisiana Avenue in Lake Charles, LA).

The Court *sua* sponte rescinds the Order granting plaintiff's in forma pauperis status retroactive to the day of granting same, or August 13, 2024.

A TRUE COPY
1-10-2005
Maha
Date:

Clark

31 pages

LAKE CHARLES CITY COURT

118 West-Mill **Street** Lake **Charles**, LA 70601

STATEMENT

January 7, 2025

John Clifford J King

vs. 23-2124

Renee Amos Notary Public Notary ID# 29374

and

Hartford Fire Insurance Company

Transcript of testimony of hearing on December 30, 2024
Judge Ronald C. Richard

$ 170.50

paid in full

TA

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING

Plaintiff

*

*

NO. 23-2124

VERSUS

RENEE AMOS NOTARY PUBLIC

NOTARY ID# 29374

Defendant

* **** *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 30th day of December 2024, beginning at 9:00 a.m.

APPEARANCES

FOR THE PLAINTIFF,

JOHN CLIFFORD J KING:

OLIVER SCHRUMPF

SCHRUMPF LAW OFFICE, APLC 3801 MAPLEWOOD DRIVE

SULPHUR, LA 70663

(337) 625-9077

EMAIL:

oschrumpf@schrumpf-law.com

FOR THE DEFENDANTS,

RENEE AMOS NOTARY PUBLIC

NOTARY ID# 29374

and

HARTFORD FIRE INSURANCE COMPANY:

EDWARD K. BAUMAN

1801 RYAN STREET

LAKE CHARLES, LA 70601

(337) 491-0570

EMAIL:

ed@lakecharlesattorney.com

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PROCEEDINGS

* *

COURT CALLED TO ORDER

THE COURT:

co

Good morning everyone.

MR. SCHRUMPF:

Good morning Judge.

MR. BAUMAN:

Good morning Your Honor.

THE COURT:

Before we start court, I

would love
to recognize the
incredible
Miss Lois. Today is her 80th birthday. Miss
Lois, my intention,
uh,
since we had to
drag y'all
in today
for
this
special
fixing, my intention was to take you to
lunch
somewhere fancy but in light
of
Marshal Alcede's funeral, I would ask that
if I could take you to lunch maybe later
this week. All right. Okay. Calling the

23

matter of

let

me get

my

binders

24

unclipped

the matter

of,

uh,

John

25

Clifford King

good Lord, I can't find

one good style on this thing. Hold on.

John Clifford King versus Renee Amos and The Hartford Insurance Company, docket number 23-2124. I have called, sort of, this this quickie hearing to address a couple of matters. This case was the trial in this matter came before this court back on what date madame clerk?

CLERK:

14th. November 14th,

THE COURT:

November 14th? On November 14th trial was had in this matter.

Immediately thereafter, a hearing on contempt was had with regard to Mr. King and having said all that and having the history in place, let's go ahead and have appearances from counsel and then we'll discuss the matter. I believe we have new

counsel on board for

MR. BAUMAN:

That's correct Your Honor. Ed Bauman and I will be enrolling on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

Okay. I believe I signed, uh, a motion with the other lady

MR. BAUMAN:

Yes. You did Your Honor.

THE COURT:

I can't remember her name slips I just

MR. BAUMAN:

Kamie

THE COURT:

Kamie. Miss Kamie. Uh, she withdrew and you're enrolled, correct?

MR. BAUMAN:

Correct.

THE COURT:

Okay. Good deal. All right, go ahead Mr. Oliver. Make your appearance.

MR. SCHRUMPF:

I'm Oliver Schrumpf and as you know, I represent John King in the matter which is on appeal now and this Court has no jurisdiction to do anything on that case.

THE COURT:

Uh, well, we'll talk about that, all right?

MR. SCHRUMPF:

Okay.

THE COURT:

I I tend to tend to agree with you initially that, uh, appeal gets filed and we send it all up to the Third Circuit and we let them take care of

things, but I want to clarify something

real real quick. On

at trial, uh, and

before trial, I made it very clear to your

client Mr.

there King that

had been a

letters,

history

filings, of multiple

phone calls, contact, various things, with

the judge's

judge's office. He, uh, ultimately

retained you and I cautioned him then as

as as yourself that

he has counsel

well

and is represented, all pleadings are

to

be filed through you, okay? That's why we have lawyers in the case. I also will note for the record that at at the trial of this matter, We had the trial, and then immediately subsequent to trial, we held

our rule with for contempt regard to various behaviors of Mr. King. The

unfortunately, you advised the court that you were not retained to represent him with regard to the contempt matter and you existed the courtroom sir.

MR. SCHRUMPF:

Absolutely.

THE COURT:

Uh, and since that time, Mr.

King's efforts at filing things with this court have continued okay? As you well are aware and you've been copied on this and opposing counsel was not copied on these filings and

pleadings that were,

believe, made on December 12th, okay? And the reason I'm taking this rather unusual action of having us here today to talk about the matter is that, uh, on December 12th Mr. King filed various motions with the court which I believe you have copies of. Am I correct counsel?

MR. SCHRUMPF:

I was copied on the email.

THE COURT:

Okay. And, uh, we all agree that opposing counsel, Miss Kamie at the time, was not copied.

MR. SCHRUMPF:

I don't know.

THE COURT:

Well, if you look at his emails, she wasn't, okay? You were. I was

and madame clerk was but opposing counsel was not copied. Once again, this leads to more confusion about all parties not being properly advised as to what's going on in the matter. Specifically, he filed motions entitled Recuse to / Emergency Motion Remove Honorable Judge Ron Richard; Motion to Vacate Retaliatory Judgments; Motion to Strike and Seal Identifying Information from Public Record; Motion to Intervene to Prevent Harassment further Judicial and

Loss of Life. Once again, in those motions making substantially the very similar statements that led to the contempt rule in the first place. Now, I will admit Mr. Schrumpf, you caught me off guard when you

said, T

don't represent this gentleman with regard to contempt and you walked out the courtroom. There was so much going on that day due to the behavior of your client and quite frankly, his wife, that it caught me off guard. In hindsight, I would have instructed you to remain in the courtroom and advised you that you signed on to represent the guy

and
if
you
represent him, you can't just bifurcate
on his actions with
the representation
regard
to the
court
and
I
would have
required that you stay for the matter of
the rule
for contempt, okay? Now
since

this filing of December 12th that he has

and confusion the glaring made,

created by a lawyer saying,

chaos

I represent

the guy but not in everything in this case,

has become more apparent, okay? And so I

am instructing you now that you represent

him in this docket number, okay? And I am

going to set everything he

2

2

22

23

going to set

24

25

filed. I'm

set for hearing and I'm gonna

give notice to everyone in this courtroom

of that hearing date and we're gonna come

back and have a hearing on it. The reason I'm not having a hearing on these things today because I think we had to get out of the way who's first, who. Okay, who's driving the And ship? you're either driving that ship or you're or you're not driving that ship. isn't a This family matter where one takes lawyer over property

settlement issues that come after custody and child support and all those sorts of things. This is the matter and in the very matter, he is continuing his behavior that is causing much chaos and confusion with the actual legal process. All right? I am

setting the matter for January 15th at a.m. You can have your client here or not. I prefer that all parties be here.

All parties are entitled here. to be I am instructing everyone to have their clients here, all right? But, we're gonna have hearing on these matters that day.

MR. SCHRUMPF:

What

THE COURT:

now I want to

MR. SCHRUMPF:

what is being said

THE COURT:

hold on one second.

MR. SCHRUMPF:

Okay.

THE COURT:

One of the reasons why I'm having to take this extraordinary action is that in Mr. King's motion that he filed himself without you, his lawyer, he makes

again statements allegedly accusing this court and its staff of improper behavior. In fact, on January, I believe it was 12th, uh, I mean I'm sorry, December I'm to next month. I'm just already jumping to hoping. On December 12th, uh, when these motions were filed, were filed, Mrs. King had either that day immediately before, OF called this courthouse, got Miss Kay Bang on the phone who is the paralegal that basically

runs upstairs for us and advised her that

my behavior and her behavior

had led to

the murder of a man in Iowa, Louisiana on

December 11th and that there were, uh,

quote/unquote, white man went her in-laws house looking for her due to me, uh, this court putting this case on PACER. Let the record reflect PACER is a federal court record retention filing service. Nothing from Lake Charles City Court would be available on PACER, whatsoever and that this gentleman was shot six (6) times and

killed in Iowa and that me and Miss Kay Bang are responsible for that. And then on top of it, that it was such a big deal, three (3) police helicopters were circling that part of Calcasieu Parish to locate the man. I'm Okay? giving you some background as to why we gonna get who's who running the ship on each side here.

All right? I will just note for the record that I have verified, verified, and my staff has law enforcement through Calcasieu Parish, that there were indeed no murders in Iowa, Louisiana on December 11th or according to one of the chiefs at the Sheriff's Department, no murders in Iowa at all this year. All right? And the closest police helicopter to be used in

in Louisiana with relations to

to Lake Charles would be Baton Rouge and I don't believe we have three (3) of them. Okay?

It's kind that of behavior that is necessitating me having a hearing on these issues but having me do what I'm doing today which is to say,

we're having the hearing and you're they're lawyer. You're his lawyer. Okay? That's the order of the

court. Now, in another matter, another issue, as you're aware, there is currently a rule of contempt that has been filed for this, noticed by this court with regard to Mr. King's wife, Mrs. Shunte King and, uh, service with regard to that rule, uh, this being due to her calling illegally calling 9-1-1 in the middle of the trial and having EMTs show up in this courtroom concerned that someone was having they had been told that someone was having a

seizure in the courtroom which was all a complete lie and a complete fabrication and untruth. The addresses provided by your client, both on Louisiana Avenue, Simmons Street, and the Iowa address have

all come back as, she does not live there, neither does he, although that's the information provided. Now, Mrs. King made certain assertions, uh, both in various writings, phone calls and on the stand in the trial wherein you were counsel, that there is some some very important reason as to why she is in witness

her

protection or something of that nature and her personal information should not be provided to the public or put in a public record due to, uh, some bad people wanting to get her and, uh, our understanding is that is what she alleged happened December 11th. That we released her whereabouts, or her contact

this bad man

information, and these

showed up at her in-laws house in Iowa,

of

death resulted, all

We have established is completely

Louisiana and

a

which

not true.

So what we

have here is your

client filing things with the court; his

wife calling the court making statements;

this court unable to serve her with regard

to that because the addresses they have

provided locally are indeed not valid. So, I am ordering you, and you may do this under seal and no will one See this. H want to be very clear. It will be placed in the record under seal. I am ordering you to provide the address of Mr. King at his home in New Jersey. This court, I will tell you right now, intends to have her served through Long Arm Statute.

MR. SCHRUMPF:

I'm

Say sorry. that again please.

THE COURT:

This court intends to have her served through Long Arm service. Okay? I'm ordering you to provide that today before you leave the courtroom.

MR. SCHRUMPF:

If I have it.

THE COURT:

You have an address for him.

You have received payment from him.

You

23

24

have it. This court is

court is done with people

playing coy with the rules and with the

25

law. This is the way it works. People get

a lawyer or they don't get a lawyer. They come to court. They state their case. If they win, they win. If they don't like it, they appeal. This is how it works but the kind of behavior that has been exhibited here will not be allowed and this court and it's staff being being accused of being involved in a murder will not be allowed.

Period. Now, having said my peace and what I have ordered to be done, the court can hear you.

MR. SCHRUMPF:

The court will what?

THE COURT:

Will hear you.

MR. SCHRUMPF:

Judge, I did not prepare the motions that were filed by Mr. King. I did not

THE COURT:

I agree with you.

MR. SCHRUMPE:

get counsel from it. I didn't know it was gonna be filed.

THE COURT:

I believe you.

MR. SCHRUMPF:

And I I have nothing to do with those motions.

THE COURT:

I believe you.

MR. SCHRUMPF:

Okay.

THE COURT:

One hundred percent (100%). I

do not think that you have been involved

in any of this behavior. I think you have

the reality of a a client who is probably

not listening to what I believe would probably be your very good advice. I .

I

you are very well respected by me.

I have always believed you to be an upright and intelligent and very capable attorney, uh, and I simply am going to require that, since you're the attorney on this case, you're the attorney for everything on this case with regard to Mr. King, okay? Now, so, my order is that's when the hearing on all of these things he filed, unless he

withdraws them before that date, okay?

That's I that guess resolves that matter.

MR. SCHRUMPF:

Unless what?

THE COURT:

he Unless withdraws them before that date, we're gonna have a hearing on those matters on that date, okay? I am ordering that you provide his

home address. It will be placed under seal. Mr. Bauman, we've sort of ignored you. My apologies.

My apologies. Do you have anything you wish

MR. BAUMAN:

quite all right, Your Honor.

THE COURT:

to say?

MR. BAUMAN:

Just absorbing it all in.

THE COURT:

Now, Okay. having said all that, We do have one other matter that needs to be addressed. I granted, back on

August 13th of this year, I had granted pauper I granted pauper status to Mr. King. Now, this came after he had made multiple attempts at achieving pauper status and I had denied them each time simply because there was no affidavit attached, there or whatever. Things weren't filed in the record. Anyhow, it was just procedural stuff and

quite

frankly, I wasn't denying it based on any of the information he placed in it, it just wasn't procedurally

correct SO We would deny it, send it back and say hey you need, one two three, or whatever it was.

In August, I received his pauper status request and, uh, and it looked procedurally right so I signed off on it and I

granted
status. pauper
Okay?

Subsequent to that, he hired counsel and in fact, in one of his hearings subsequent to me granting pauper status, he advised that he spent twelve thousand dollars ($12,000.00) on lawyers in this past year, okay? Information which he did not place in the pauper affidavit and which would

have been a

information a very relevant piece of

to me in granting pauper

status because if you've got twelve (12)

grand to hire lawyers, then you can pay

the court costs in City Court. Having

recalled that and after he made that

statement, I actually went back and took a look at the pauper status, uh, pauper request and I noticed something else that, uh, I am rather embarrassed that I missed, but I just don't know if I didn't remember the wife's name or whatever, or if I really knew, but, uh, and I'll provide this for everyone in the courtroom to look at. But, as you well know, any pauper affidavit must be accompanied by a third party affidavit by someone who knew he person, knows their situation and can say,

uh, I and know Lois she's, uh, hadn't worked in ten (10) years, and whatever. And I can say speak some truth to her assertion that she is a pauper. And of course, a third party would be, in my case, Mr. Bauman or you would be a third party to me. You're not married to me. You're

not my first cousin or you know, whatever, my dad or etcetera. However, in reviewing this, I realized that the third party affidavit was executed by Mr. King's wife, Shunte King. Okay? Now, uh, I did not realize at the time that was his wife, uh, and when everything's written in it's kind of open to some

cursive,

interpretation but going back and taking a good look at it, I realized, uh, that she

That did that.

would of course be improper and would make the affidavit null and void because it's not executed by a third party. It's executed by his wife. She's not a third party. Not only is she not a third party, she's such a close party

that Louisiana law would require that we couldn't even make her testify against him because of spousal privilege. The very nature of being a third party would mean no privilege there. So,

this Court will sua sponte rescind the order for pauper. It is not procedurally correct. It is not properly done. It is therefore not a legal filing and So the court is gonna order

that the pauper status be rescinded retroactive to the date of granting and the court would caution everyone to be mindful in any statements made in any, uh, future such motions, uh, because a statement of having twelve thousand dollars ($12,000.00) to spend on lawyers means you got a couple hundred dollars to spend on court costs. Anyhow, all right

MR. SCHRUMPF:

Judge, I ... I ... as the since I am their attorney, at this point I have to say that this Court has no jurisdiction to take the action you just ordered under Code of Civil Procedure Article 208a, there are certain things that the court can do

THE COURT:

uh huh

MR. SCHRUMPF:

after the appeal has been granted.

THE COURT:

Right.

MR. SCHRUMPF:

And that's not one of them.

THE COURT:

But you your problem here sir is that your client continues in the behavior. Your client can't keep invoking the jurisdiction of this court and then

claim that this court has no jurisdiction.

There has to be consequences for continuing to involve. So what I suggest is, shall I speak bluntly? Get a grip on your client and tell him to stop. Okay? Because as long as he's gonna file things here, this court's gonna have jurisdiction. Okay? You don't get to say, oh, I'm appealing it and therefore I can just do and say whatever I want to this court. I make whatever allegations, assertions I want regarding this court. I

can in file things the record. I can continue to obey court orders and if you think that the Code of Civil Procedure in any way, shape OF form allows for this kind of behavior and then you get to hide behind, I filed an appeal, I beg to differ.

Okay. That is not what it meant. I'm not able to make

rulings generally. any

I

go back and redo

and redo things. I can't

can't go back

undo things. I can't

there's all sorts

of things I shouldn't be able to do except

he keeps addressing the court and filing

pleadings and his wife continues with her

contemptuous behavior. Okay? And SO,

I

don't like doing this. I don't know what

the right thing is to truly do but I know

that this behavior's gonna stop one way or

the other, period. We're

period. We're not gonna have

this. Anything Mr. Bauman?

MR. BAUMAN:

No Your Honor.

16

THE COURT:

17

All right. Mr. Schrumpf

MR. SCHRUMPF:

I will see

THE COURT:

Do we have an envelope Miss

Somebody get me an envelope. He's

Bang?

gonna put the

in address

the envelope.

It's gonna be sealed and tendered to the

court. This

information

will not be

revealed to anyone other than immediate court staff or, uh, or deputy marshals who are involved in the Long Arm Service process regarding Miss King.

MR. BAUMAN: Your Honor, I'm filing motion to enroll with the Third Circuit regarding the appeal.

THE COURT: Yes sir.

MR. SCHRUMPF:

And

and Judge, there's no jurisdiction to sign any kind of order.

And, I I went through this in Allen Parish trying to enroll in a case where someone had taken an appeal and it was denied. I couldn't even enroll in because that's not one of the things allowed.

THE COURT:

He's

he's

enrolling in

the Third Circuit I believe he just said.

MR. BAUMAN:

Yea.

THE COURT:

He's not enrolling here.

MR. SCHRUMPF:

Oh okay. In the Third Circuit?

THE COURT:

Yea. Once again, uh, your clients have made this difficult situation putting me, you and all parties in a difficult mess. And I'm stuck with trying to find

way to handle this behavior.

Give that to Mr. Schrumpf please so he may

and give him a, uh, he's got a note

pad if he can just tear a piece of paper,

write the address, put it in it. It'll be

returned to me and sealed per my order.

Mr. Pete,

if you will provide me

that,

then I'll seal it.

MR. SCHRUMPF:

Judge, you should

look at

this right now before I leave. That's the address I have in my file.

THE COURT:

This Okay.

address

incorrect address that ...

is

an

Frank

MR. SCHRUMPF:

well, that's what you're telling me. That they're not you said you tried serving them and they can't be served there. As far as I know

THE COURT:

Let me be very clear

MR. SCHRUMPF:

he lives in New Jersey.

THE COURT:

Let me

let me be very clear. I haven't tried to serve anybody. The Marshal's in Office, doing their lawful duties, has made service, attempted service at three (3) addresses provided by your client. Okay? None of those addresses are where your client actually resides, okay? Your client testified in court that he resided in New Jersey.

MR. SCHRUMPF:

Yes sir.

THE COURT:

His wife testified to that as well, all right? I, due to her statements that she was in witness protection, I did

not

information require that she provide any

on the record, okay?

okay? So, I want to make very sure very clear here,

you as an officer of the court are telling me that you do not know or have an address where they live in New Jersey?

MR. SCHRUMPF:

do.

not

have their

New

Jersey address, correct.

THE COURT:

is Okay. All you have

this

one?

MR. SCHRUMPF:

This is his address

in my

file but I used

all

communications

have been by the email address

address which

I

provided to

THE COURT:

well that's how they're

that's how they're cooperating with this court. I'm just unaware of any way to do service via email, okay? This is being placed into

into the record.

It's not being sealed because it's the address

that's already in the record. I'll see you on the

15th Mr. Schrumpf.

MR. SCHRUMPF:

Okay.

MR. BAUMAN:

Thank you, Your Honor.

THE COURT:

Thank you gentlemen. Court's adjourned.

END OF HEARING

* * *

STATE OF LOUISIANA

PARISH OF CALCASIEU :

REPORTER'S PAGE

I, **Karey** J. **Bang, Certified Digital Reporter (1072019)** for the Lake Charles City Court in and for State of Louisiana, do hereby state on the Record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) and/or ellipsis (...) have been used to indicate pauses, changes in thought, and/or talk-overs; that same is the proper method for a Court Reporter's transcription of proceeding, and that the dashes (--) and/or ellipsis (...) do

not indicate that words or phrases have been left out of this transcript.

Lake Charles, Louisiana; January 7, 2025.



Кразо вану

KAREY BANG

Certified Digital Reporter

STATE OF LOUISIANA

PARISH OF CALCASIEU

REPORTER'S CERTIFICATE

I, Karey J. Bang, Certified Digital Reporter (1072019) for the Lake Charles City Court in and for State of Louisiana, do hereby certify that this testimony was reported to Shelia Hasty in the digital reporting method, was prepared and transcribed by me or under my direction and supervision, and is a true and

correct transcript to the best of my ability and understanding; that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board, or by the Supreme Court of Louisiana, and that I am not related to counsel or to the parties herein, nor am I otherwise interested in the outcome of this matter.

Lake Charles, Louisiana; January 7, 2025.

KAREY J. Bang

Certified igital Reporter

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Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Case Report

Summary

Print Date/Time: 08/25/2022 11:09
Login ID: cpsoapps\mhamolka
Case Number: 2021-00123665

Calcasieu Parish Sheriff's Office
ORI Number: LA0100000

Case

Case Number: 2021-00123665
Location: 123 LOUISIANA AVE
LAKE CHARLES, LA 70601
Reporting Officer ID: 10129 - Tarver

Incident Type: Forgery/Fraud
Occurred From: 10/06/2021 08:00
Occurred Thru: 10/09/2021 15:00
Disposition:
Disposition Date:
Reported Date: 10/09/2021 15:13 Saturday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	250	14:72	Forgery	1
2	State	240	14:67.26.C.(2)	Theft of a Motor Vehicle from $5,000 but less than $25,000	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect	1	Colston, Charmaine Yvette	[redacted]		Black	Female	[redacted] 31
Victim	1	King, John Clifford			Black	Male	[redacted] 35

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
10/09/2021	Stolen/Etc	03 Automobile	Chevrolet	See Description			

Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License Plate	State
1	Other Vehicle	Motor Vehicle	2011	Chevrolet	See Description	Red	346EYM	LA

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

STEPHEN C. DWIGHT
District Attorney
FOURTEENTH JUDICIAL DISTRICT
CALCASIEU PARISH

JACOB L. JOHNSON
First Assistant
DISTRICT ATTORNEY

P.O. Box 3206
Lake Charles, LA 70602
Phone: 337-437-3400
Fax: 337-437-3325

August 4. 2022

Calcasieu Parish Sheriff's Office
Kent Castille, 10450
Report #: 21-123665

Defendant: Charmaine Yvette Colston B/F DOB: [redacted]

Action/Status	Statute	Charge	Offense Date	Warrant
NP-Not a Criminal Matter	14:67.26.C(2)	Theft of a motor vehicle between five thousand and twenty-five thousand dollars	10/09/2021	
NP-Not a Criminal Matter	14:72.A	Forgery	10/09/2021	

NOTES/COMMENTS/OTHER REQUIREMENTS:

REVIEWED BY: **Joseph Williams**

The information requested MUST be forwarded to this office within THIRTY (30) DAYS of the date of this advisement. When forwarding a follow-up and/ or warrant, please attach a copy of this advisement.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office
TONY MANCUSO, SHERIFF AND EX-OFFICIO TAX COLLECTOR
Parish of Calcasieu • 5400 E. Broad Street • Lake Charles, LA 70615
Phone (337) 491-3700 • Fax (337) 494-4522

CPSO OFFENSE REPORT RECEIPT

Complaint # 21-123665 Investigating Deputy _____

List of evidentiary items attached to the report for consideration by D.A.'s Office:

One disc containing audio interview for John King

List of evidentiary items attached to this report electronically via Veripic:

Received by Calcasieu Parish District Attorney's Office 2/23/22 (Date) 4pm (Time)

Printed name of D.A. Representative receiving report Lacey Blackburn

Signature of D.A. Representative receiving report LMB

If there is a question or a need for immediate assistance associated with this report; the investigating officer may be contacted by email. Please always copy the listed supervisor.

Investigating Deputy _____ Email _____

CPSO Supervisor _____ Email _____

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

OFFENSE REPORT CHECKLIST

The following are tasks that should be completed prior to a report being submitted to the prosecutor.

JBL The investigation is either complete or in a state where a report needs to be submitted.

JBL The report indicates that, if applicable, the victim or victim's family has been contacted and informed of the status of the investigation.

JBL The report indicates that, all items of evidence collected have been properly submitted to evidence, records or photographic services and either scanned into the CPSO computer system by the assigned investigative assistant or investigator.

JBL The report contains an exhaustive list of items collected, whether stored in records or evidence, and the list of items collected has been placed on the CPSO Offense Report Receipt to make it easy for the prosecutor to see what information he/she should have access to for immediate consideration.

JBL The report has been preserved in the appropriate CPSO computer program and all available evidentiary attachments have been scanned into the CPSO computer system.

JBL A copy of all evidentiary items that can be replicated, digitally or otherwise, is attached to the report. This may not be necessary in certain limited circumstances.

N/A If the investigation is ongoing, that fact has been referenced in the original report to put the prosecutor on notice that more information may be available at a later date.

N/A If applicable, any in car video needed as evidence has been properly tagged and Photographic Services has been notified to transfer said video to the D.A.'s Server.

This report, complaint # 2021-00123665 , and the associated evidentiary attachments are ready to be submitted to the District Attorney's Office for review.

James Leubner
Supervisor's Signature

11/03/2021
Date

James Leubner
Supervisor's printed name

Financial Crimes
Division

NOTES: _____

OfficerID: CPSOAPPS\rtarver, Supplemental Narrative

On 10-09-21 at approximately 1500 hours I, Sgt. Ryan Tarver, was working that patrol desk when approached by the complainant, John King, who wished to file a report in reference to a forged title. King reported his ex-girlfriend, Charmaine Colston, some how obtained the title to his vehicle, a Red 2011 Chevrolet Traverse, as he had just paid it off. King alleged Colston obtained the title and forged his signature. When I ran the vin number, 1GNKRJED5BJ220559, it returned to Charmiane. King advised he had no other proof of ownership of the vehicle at this time. At this time there is nothing further.
EOR/NFI

OfficerID: CPSOAPPS\rtarver, INITIAL REPORT

21-123665 SGT RYAN TARVER COMPLETED AN OFFENSE REPORT IN REFERENCE TO A FORGED TITLE. THE COMPLAINANT FILED A REPORT AT THE SHERIFF'S OFFICE IN REFERENCE TO HIS EX-GIRLFRIEND OBTAINING HIS TITLE AND FORGING HIS SIGNATURE.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office
TONY MANCUSO, SHERIFF AND EX-OFFICIO TAX COLLECTOR
Parish of Calcasieu • 5400 E. Broad Street • Lake Charles, LA 70615
Phone (337) 491-3700 • Fax (337) 494-4522

CPSO OFFENSE REPORT RECEIPT

Complaint # 2021-00123665 Investigating Deputy Det. Kent Castille

List of evidentiary items attached to the report for consideration by D.A.'s Office:

1. Initial Report
2. Supplemental Report
3. Vehicle Title Information
4. King's Bank Statements
5. Southwest Louisiana Credit Union Documents
6. King's Work Documents

RECEIVED
NOV 08 2021
DA / INTAKE

Date Time

Signature of D.A. Representative receiving report

If there is a question or a need for immediate assistance associated with this report; the investigating officer may be contacted by email. Please always copy the listed supervisor.

Investigating Deputy Kent Castille

CPSO Supervisor James Leubner

[redacted]

CPSO Case, Officer: CPSOAPPS\rtarver, Supervisor: CPSOAPPS\jneal, Merged By: CPSOAPPS\kbooth

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT CASE# **2021-00123665**

5400 E. Broad St.
Lake Charles, LA 70615

EVENT

REPORTED DATE/TIME	OCCURRED INCIDENT TYPE	
10/9/2021 15:13	Forgery/Fraud	

OCCURRED FROM DATE/TIME	OCCURRED THRU DATE/TIME	LOCATION OF OCCURRENCE
10/06/2021 08:00	10/09/2021 15:00	123 LOUISIANA AVE LAKE CHARLES, LA

OFFENSES

	STATUTE/DESCRIPTION	COUNTS	ATTEMPT/COMMIT
01	14:72 Forgery	1	Completed

SUBJECT

JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)					
Adult Suspect	Colston, Charmaine Yvette					
DOB / AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted] 31	[redacted]					
RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black	Female	5'7 5'7	140 140	BRO	BRO	
DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3			
[redacted]	[redacted]					

SUBJECT

JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)					
Adult Victim	King, John Clifford					
DOB / AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted] 35	[redacted]					
RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black	Male	6'0 6'0	250 250	BRO	BRO	
DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3			
[redacted]	[redacted]					

SUBJECT

JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)					
DOB / AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3			

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	10/9/2021	Neal, Joshua C	10/10/2021

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.
Lake Charles, LA 70615

CASE# **2021-00123665**

GENERAL PROPERTY

GENERAL	PROPERTY CODE			VALUE
	Counterfeit/Forged			**$1.00**
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
		77 Other		
	ITEM DESCRIPTION			
	FORGED TITLE			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	**10/9/2021**	**Neal, Joshua C**	**10/10/2021**

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.

Lake Charles, LA 70615

CASE# **2021-00123665**

INITIAL NARRATIVE

21-123665 SGT RYAN TARVER COMPLETED AN OFFENSE REPORT IN REFERENCE TO A FORGED TITLE. THE COMPLAINANT FILED A REPORT AT THE SHERIFF'S OFFICE IN REFERENCE TO HIS EX-GIRLFRIEND OBTAINING HIS TITLE AND FORGING HIS SIGNATURE.

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	10/9/2021	Neal, Joshua C	10/10/2021

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.

Lake Charles, LA 70615

CASE# **2021-00123665**

SUPPLEMENTAL NARRATIVE

On 10-09-21 at approximately 1500 hours I, Sgt. Ryan Tarver, was working that patrol desk when approached by the complainant, John King, who wished to file a report in reference to a forged title. King reported his ex-girlfriend, Charmaine Colston, some how obtained the title to his vehicle, a Red 2011 Chevrolet Traverse, as he had just paid it off. King alleged Colston obtained the title and forged his signature. When I ran the vin number, 1GNKRJED5BJ220559, **it returned to Charmiane. King advised he had no other proof of ownership of the vehicle at this time. At this time there is nothing further.**

EOR/NFI

REPORTING OFFICER	DATE	REVIEWED BY	
Tarver, Ryan	**10/9/2021**	**Neal, Joshua C**	**10/10/2021**

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

☑ STRUCTURAL STEEL ☐ PIPE ☐ CURTAIN WALL ☐ PRECAST
☐ LIGHT GAUGE STEEL ☐ MISC. STEEL

CLIENT: JP Morgan Chase
DATE: 09/07/2021
PROJECT: JP Morgan Chase - 270 Park Ave P3 Core and Shell
FTC NO.: JPMC118P3
PROJECT LOCATION: 270 Park Avenue, New York, NY 10017
PAGE NO.: 1 OF 3
SHOP LOCATION: 1640 New Market Ave, S. Plainfield, NJ 07080
INSPECTOR: John King
WELDING CONTRACTOR: Banker Steel Company
TIME IN: 12:00 pm TIME OUT: 8:30 pm

DESCRIPTION OF INSPECTION:
Monitoring the in process welding and fabrication of: 4082C004, 4082C005

LOCATION OF INSPECTION:
Banker Steel, South Plainfield, NJ Shop 7

REFERENCE DRAWINGS BY / DRAWINGS NO. / DATE / REVISION DATE:
TR.TJ/4082C004/11.16.2020/03.11.2021/R1 NT.MM/4082C005/11.11.2020/03.11.2021/R1

MATERIAL TYPE: A572-Gr 50 CVNA

WELD CHECKLIST	INSPECTION RESULTS Accepted	Rejected
Joint Type: ☐ Fillet ☑ Groove ☐ _____	√	
Welding Process: SAW, FCAW	√	
Electrode: E70T-1C(Lincoln XP70), E71T-1C(HDC, UC71), F7A2-EM12K(L61)	√	
Size of Weld: Various	√	
Final Visual Inspection	*	

Welder 1:	B. Thomas	**Cert. No. :**	41054	**Expiration:**	*
Welder 2:	C. Dimaggio	**Cert. No. :**	4690	**Expiration:**	*

REMARKS:
Welder #3 C. Candelario 4715*

* See Banker Steel management for WQR expiration dates.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

RPT-84
(Rev 01/05/17)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	DATE:	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	FTC NO.:	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	PAGE NO.:	2 OF 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	INSPECTOR:	John King
WELDING CONTRACTOR:	Banker Steel Company	TIME IN:	12:00 pm TIME OUT: 8:30 pm

4082C004 - bp2684, bp2649 - Welder #2, Welder #3 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

4082C005 - bp2684, bp2649 - Welder #1 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☐ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	3 **OF** 3
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

NON CONFORMANCES: N/A

Inspections Witnessed: N/A

Final Inspection: N/A

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

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Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

☑ STRUCTURAL STEEL ☐ PIPE ☐ CURTAIN WALL ☐ PRECAST
☐ LIGHT GAUGE STEEL ☐ MISC. STEEL

CLIENT: JP Morgan Chase
DATE: 09/07/2021

PROJECT: JP Morgan Chase - 270 Park Ave P3 Core and Shell
FTC NO.: JPMC118P3

PROJECT LOCATION: 270 Park Avenue, New York, NY 10017
PAGE NO.: 1 OF 4

SHOP LOCATION: 1640 New Market Ave, S. Plainfield, NJ 07080
INSPECTOR: John King

WELDING CONTRACTOR: Banker Steel Company
TIME IN: 12:00 pm TIME OUT: 8:30 pm

DESCRIPTION OF INSPECTION:
Monitoring the welding and fabrication of: 1A271G04, 3091C006

LOCATION OF INSPECTION:
Banker Steel, South Plainfield, NJ Shop 9

REFERENCE DRAWINGS BY / DRAWINGS NO. / DATE / REVISION DATE:
VS.PN/3091C006/11.10.2020/03.31.2021/R2

MATERIAL TYPE: A572-Gr 50

WELD CHECKLIST	INSPECTION RESULTS	
	Accepted	Rejected
Joint Type: ☑ Fillet ☑ Groove ☐ _____	√	
Welding Process: FCAW, SAW	√	
Electrode: E70T-1C(Lincoln XP70), E71T-1C(HDC, UC71), F7A2-EM12K(L61)	√	
Size of Weld: Various	√	
Final Visual Inspection	√	

Welder 1: G. Capobianco Cert. No.: 4600 Expiration: *
Welder 2: C. Lares Cert. No.: 4701 Expiration: *

REMARKS:

* See Banker Steel management for WQR expiration dates.

John King
FTC Inspector

Client's Representative

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	2 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

3091C006 - BP31, BP2372, BP32 - Welder #1, Welder #2 - SAW - per WPS # 20-600 DCW BC-P2-S (Mod) Rv4. Preheat and parameters were compliant with procedure. VT inspection showed no defects at time of inspection. Position 2G.

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	DATE:	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	FTC NO.:	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	PAGE NO.:	3 OF 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	INSPECTOR:	John King
WELDING CONTRACTOR:	Banker Steel Company	TIME IN: 12:00 pm	TIME OUT: 8:30 pm

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
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RPT-57
(Rev 10/11/18)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

FTC

WELD VISUAL INSPECTION

☐ FIELD ☑ SHOP

CLIENT:	JP Morgan Chase	**DATE:**	09/07/2021
PROJECT:	JP Morgan Chase - 270 Park Ave P3 Core and Shell	**FTC NO.:**	JPMC118P3
PROJECT LOCATION:	270 Park Avenue, New York, NY 10017	**PAGE NO.:**	4 **OF** 4
SHOP LOCATION:	1640 New Market Ave, S. Plainfield, NJ 07080	**INSPECTOR:**	John King
WELDING CONTRACTOR:	Banker Steel Company	**TIME IN:**	12:00 pm **TIME OUT:** 8:30 pm

NON CONFORMANCES: 1A271G04 piping porosity the entire length of weld.

Inspections Witnessed: N/A

Final Inspection: 1A271G04 failed.

Documents Reviewed: N/A

*FOR INFORMATIONAL PURPOSES ONLY - BANKER STEEL WILL PROVIDE FINAL SIGN OFF.

John King
FTC Inspector

Client's Representative

Future Tech Consultants of New York, Inc.
52 East 2nd Street, Mineola, New York, 11501 Tel: (516) 355-0168 Fax: (516) 355-0271

5. Southwest Louisiana Credit Union Documents

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Details

GENERAL

Record Type	Lien Holder Code	Transaction.Office Number	Imported	Brand Flags
Lien Notification	ELSE	254	10/9/2018 10:00 AM	

VEHICLE

Vehicle Make	Vehicle Year	VIN
CHEV	2011	1GNKRJED5BJ220559

OWNER

Owner Name	Extended Name	Owner Address	Domicile Code
JOHN CLIFFORD KING		[redacted]	1001

LIEN

Transaction Date	Lien Holder Filing Date	Secondary Mail Type	Secondary Mail Name	Secondary Mail Address
10/8/2018 12:00 AM	10/4/2018 12:00 AM			

MAINTENANCE

Request Made	Requesting User Name	Maintenance Request Type
4/13/2021 8:05 AM	rharrington	Lien Satisfied, Mail to Owner

ADDITIONAL INFORMATION

Loan Number	Contact Number

Notes

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Southwest
LOUISIANA CREDIT UNION

MEMBER TO MEMBER AUTHORIZATION FORM

Print to CDP Manage and Save as an Account Change Card

Member Name: CHARMAINE COLSTON

Member Number: 1000059007

Allow access to transfer to the following:

Member Name	Member Number	Relationship
JOHN KING	1000058944	HUSBAND

I, CHARMAINE COLSTON do hereby authorize Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I understand that any changes must be made by me in person at the Credit Union. I am aware that I'm allowed to make transfers only to other members share accounts and I'm not authorized to make inquiries on these accounts.

Member Signature [signature] Date: 3/14/17

I, _____ do hereby revoke Southwest Louisiana Credit Union to allow the above listed transfers to be made thru the Audio Response System or through CU@Home. I am aware that by revoking such authorization, I am no longer allowed to make transfers to these members share accounts

Member Signature _____ Date: _____

MSR: AW MSR #: 012

4. King's Bank Statements

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Capital One

John King
20011 Diamond Hills Ln
Katy TX 77449-5809

John King,
Did you know you can manage your money quickly and conveniently with the Capital One mobile app?
Scan this QR Code with your phone's camera to download the top rated Capital One Mobile app.

Here's your **September 2021** bank statement.

STATEMENT PERIOD
Sep 1 - Sep 30, 2021

$4,211.53 TOTAL ENDING BALANCE IN ALL ACCOUNTS

Account Summary

ACCOUNT NAME	Sep 1	Sep 30
[redacted]	$2,299.64	**$4,210.05**
	$1.48	**$1.48**
	$2,301.12	**$4,211.53**

Cashflow Summary

+ $0.17 INTEREST EARNED THIS PERIOD
− $0.00 FEES THIS PERIOD
− $0.00 FINANCE CHARGES THIS PERIOD

John King | STATEMENT PERIOD Sep 1 - Sep 30, 2021

[redacted]

0.10%	$1.65	30
ANNUAL PERCENTAGE YIELD (APY) EARNED	YTD INTEREST AND BONUSES	DAYS IN STATEMENT CYCLE

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 1	**Opening Balance**			**$2,299.64**
Sep 1	Debit Card Purchase - NJT RAIL MYTIX 973 2755555 NY	Debit	**- $9.00**	$2,290.64
Sep 1	Digital Card Purchase - AMZN MKTP US 257SJ2F52 AMZN COM BIL WA	Debit	**- $13.54**	$2,277.10
Sep 2	Withdrawal from DISCOVER E-PAYMENT	Debit	**- $1,000.00**	$1,277.10
Sep 2	Deposit from 3428 FUTURE TECH DIRDEP	Credit	**+ $3,056.90**	$4,334.00
Sep 2	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	**- $4.61**	$4,329.39
Sep 2	Debit Card Purchase - NJT RAIL MYTIX 973 2755555 NY	Debit	**- $9.00**	$4,320.39
Sep 2	Debit Card Purchase - EDISON PARKING LOT EDISON NJ	Debit	**- $5.00**	$4,315.39
Sep 2	Debit Card Purchase - AMZN MKTP US 252JL1N72 AMZN COM BIL WA	Debit	**- $18.07**	$4,297.32
Sep 3	Preauthorized Withdrawal to SOUTHWEST LOUISIANA CREDIT UNION savings account XXXXXX8944	Debit	**- $600.00**	$3,697.32
Sep 3	Debit Card Purchase - PARKFAST 010 NEWARK NJ	Debit	**- $90.00**	$3,607.32
Sep 3	Debit Card Purchase - EDISON PARKING LOT EDISON NJ	Debit	**- $5.00**	$3,602.32
Sep 4	Debit Card Purchase - MARSHALLS 140 PASSAIC KEARNY, NJ US	Debit	**- $120.29**	$3,482.03
Sep 5	Debit Card Purchase - WHOLEFDS NWK#105 609 B NEWARK, NJ US	Debit	**- $8.73**	$3,473.30
Sep 5	Debit Card Purchase - NJT RAIL MYTIX 973 2755555 NY	Debit	**- $9.00**	$3,464.30
Sep 5	Debit Card Purchase - SQ FACELOOK BARBER SH SOUTH PLAINF NJ	Debit	**- $45.00**	$3,419.30
Sep 7	Withdrawal from DISCOVER E-PAYMENT	Debit	**- $2,500.00**	$919.30
Sep 7	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	**- $4.75**	$914.55
Sep 7	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD	Debit	**- $2.65**	$911.90

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
	NJ			
Sep 7	Debit Card Purchase - EDISON PARKING LOT EDISON NJ	Debit	- $5.00	$906.90
Sep 7	Debit Card Purchase - HARRISON S BAGEL SHOP HARRISON NJ	Debit	- $14.67	$892.23
Sep 7	Digital Card Purchase - AMZN MKTP US 252CT2I51 AMZN COM BIL WA	Debit	- $20.25	$871.98
Sep 7	Debit Card Purchase - NJT RAIL MYTIX 973 2755555 NY	Debit	- $5.25	$866.73
Sep 8	Withdrawal for $1500 was Rejected			$866.73
Sep 9	Weekending 8,29,2021 - Check Deposit (Mobile)	Credit	+ $875.00	$1,741.73
Sep 9	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $5.36	$1,736.37
Sep 9	Debit Card Purchase - CASH APP [redacted] 4153753176 CA	Debit	- $600.00	$1,136.37
Sep 10	Debit Card Purchase - MCDONALD S F6978 NEWARK NJ	Debit	- $16.70	$1,119.67
Sep 10	Debit Card Purchase - SQ BLACK SWAN ESPRESS NEWARK NJ	Debit	- $5.10	$1,114.57
Sep 12	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $5.46	$1,109.11
Sep 12	Debit Card Purchase - MCDONALD S F35893 SOUTH PLAINF NJ	Debit	- $11.71	$1,097.40
Sep 12	Debit Card Purchase - DISNEY PLUS BURBANK CA	Debit	- $15.11	$1,082.29
Sep 13	Withdrawal from NAVIENT NAVI DEBIT	Debit	- $100.00	$982.29
Sep 13	Withdrawal from DISCOVER E-PAYMENT	Debit	- $500.00	$482.29
Sep 13	Withdrawal for $1500 was Rejected			$482.29
Sep 13	Digital Card Purchase - AMZN MKTP US 2G5XH01L0 AMZN COM BIL WA	Debit	- $54.69	$427.60
Sep 13	Digital Card Purchase - AMAZON COM 2G77X7P00 AMZN COM BIL WA	Debit	- $25.59	$402.01
Sep 13	Debit Card Purchase - AMZ TWITCH PAY AMAZON C WA	Debit	- $5.40	$396.61
Sep 14	Digital Card Purchase - AMZN MKTP US 2G91X3MZ1 AMZN COM BIL WA	Debit	- $26.52	$370.09
Sep 14	Digital Card Purchase - AMAZON COM 2G2N11XU0 AMZN COM BIL WA	Debit	- $158.87	$211.22

John King | STATEMENT PERIOD Sep 1 - Sep 30, 2021

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 14	Digital Card Purchase - AMZN MKTP US 2G5K005O1 AMZN COM BIL WA	Debit	- $29.31	$181.91
Sep 16	Deposit from 3428 FUTURE TECH DIRDEP	Credit	+ $2,950.86	$3,132.77
Sep 19	Digital Card Purchase - BEENVERIFIED INC 8559046471 NY	Debit	- $28.61	$3,104.16
Sep 19	Debit Card Purchase - SQ FACELOOK BARBER SH SOUTH PLAINF NJ	Debit	- $30.00	$3,074.16
Sep 19	Debit Card Purchase - TMOBILE AUTO PAY 800 937 8997 WA	Debit	- $240.92	$2,833.24
Sep 20	Debit Card Purchase - APPLEBEES 995364700479 KEARNY NJ	Debit	- $37.95	$2,795.29
Sep 20	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $6.63	$2,788.66
Sep 20	Digital Card Purchase - NETFLIX COM LOS GATOS CA	Debit	- $19.47	$2,769.19
Sep 21	Debit Card Purchase - QUICK CHEK CORP PISCATAWAY, NJ US	Debit	- $4.78	$2,764.41
Sep 21	Debit Card Purchase - THE VANGUARD HARRISON NJ	Debit	- $92.77	$2,671.64
Sep 21	Debit Card Purchase - LAGOS SPOT NEWARK NJ	Debit	- $22.39	$2,649.25
Sep 22	Debit Card Purchase - BURLINGTON STORES 328 S PLAINFIELD, NJ U	Debit	- $69.94	$2,579.31
Sep 22	Debit Card Purchase - QUICK CHEK CORP PISCATAWAY, NJ US	Debit	- $1.06	$2,578.25
Sep 23	Debit Card Purchase - CASH APP [redacted] 4153753176 CA	Debit	- $100.00	$2,478.25
Sep 23	Debit Card Purchase - SQ ARRIVAL FITNESS NEWARK NJ	Debit	- $4.00	$2,474.25
Sep 23	Debit Card Purchase - D AND G TIRES INC NEWARK NJ	Debit	- $55.45	$2,418.80
Sep 24	Debit Card Purchase - CHICK FIL A 03993 SOUTH PLAINF NJ	Debit	- $8.16	$2,410.64
Sep 24	Debit Card Purchase - AMAZON COM 2G26J37L2 A AMZN COM BIL WA	Debit	- $21.99	$2,388.65
Sep 26	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $5.36	$2,383.29
Sep 26	Debit Card Purchase - NIKEPOS US NEWARK NJ	Debit	- $314.85	$2,068.44
Sep 26	Debit Card Purchase - AMAZON COM 2C2IH8ZE0 A AMZN COM BIL WA	Debit	- $12.54	$2,055.90
Sep 27	Withdrawal from DISCOVER E-PAYMENT	Debit	- $1,500.00	$555.90

capitalone.com 1-888-464-0727 P.O. Box 60, St. Cloud, MN 56302 MEMBER FDIC

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 27	Debit Card Purchase - MCDONALD S F6978 NEWARK NJ	Debit	- $8.31	$547.59
Sep 27	Debit Card Purchase - MCDONALD S F6978 NEWARK NJ	Debit	- $12.88	$534.71
Sep 27	Debit Card Purchase - EDIBLE ARRANGEMENTS 22 NEWARK NJ	Debit	- $31.98	$502.73
Sep 27	Debit Card Purchase - AMZ EDIBLE BRANDS PAY AMAZON C WA	Debit	- $125.79	$376.94
Sep 27	360 Checking Card Adjustment Signature (Credit) AMZ EDIBLE BRANDS PAY AMAZON C WA	Credit	+ $10.66	$387.60
Sep 28	Weekending 9-19-21 - Check Deposit (Mobile)	Credit	+ $875.00	$1,262.60
Sep 29	Debit Card Purchase - QUICK STOP DELI GRIL S PLAINFIELD NJ	Debit	- $5.50	$1,257.10
Sep 29	Debit Card Purchase - APPLE COM BILL 1111111111 CA	Debit	- $10.81	$1,246.29
Sep 30	Deposit from 3428 FUTURE TECH DIRDEP	Credit	+ $3,056.90	$4,303.19
Sep 30	Debit Card Purchase - QUICK CHEK FOOD STR SOUTH PLAINF NJ	Debit	- $66.00	$4,237.19
Sep 30	Debit Card Purchase - ARRIVAL CR ARRIVAL CR NEWARK NJ	Debit	- $11.13	$4,226.06
Sep 30	Debit Card Purchase - AUDIBLE 2C3ZA9D31 AMZN COM BIL NJ	Debit	- $16.18	$4,209.88
Sep 30	Monthly Interest Paid	Credit	+ $0.17	$4,210.05
Sep 30	**Closing Balance**			**$4,210.05**

Fees Summary

	TOTAL FOR THIS PERIOD	TOTAL YEAR-TO-DATE
Total Overdraft Fees	**$0.00**	**$0.00**
Total Return Item Fees	**$0.00**	**$0.00**

[redacted]

0.00%	$0.00	30
ANNUAL PERCENTAGE YIELD (APY) EARNED	YTD INTEREST AND BONUSES	DAYS IN STATEMENT CYCLE

DATE	DESCRIPTION	CATEGORY	AMOUNT	BALANCE
Sep 1	**Opening Balance**			**$1.48**
Sep 30	**Closing Balance**			**$1.48**

Fees Summary

	TOTAL FOR THIS PERIOD	TOTAL YEAR-TO-DATE
Total Fees	**$0.00**	**$0.00**

If anything in your statement looks incorrect, please let us know immediately.

In case of error or questions about your electronic transfers, we can be reached by telephone at 1-888-464-0727, or mail at P.O. Box 60, St. Cloud, MN 56302. Or, log in to your account at capitalone.com and click on the transaction. If you think your statement or receipt is wrong or if you need more information about a transfer listed on your statement or receipt, you must let us know within 60 days after we sent you the FIRST statement on which the error appeared.

(1) Tell us your name and account number.

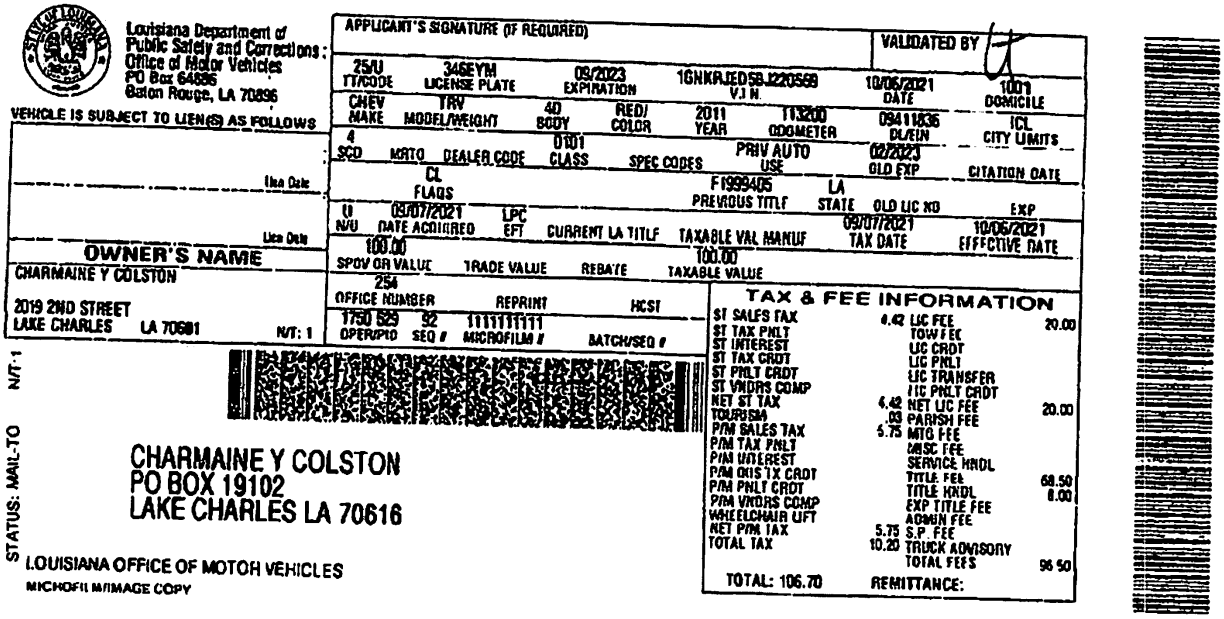
(2) Describe the error or the transfer you are unsure about, and provide an explanation of why you believe it is an error or why you need more information.

(3) Tell us the dollar amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this, we will credit your account for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation.

3. Vehicle Title Information

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division



Louisiana Department of Public Safety and Corrections: Office of Motor Vehicles PO Box 64886 Baton Rouge, LA 70896

VEHICLE IS SUBJECT TO LIEN(S) AS FOLLOWS

Lien Date

Lien Date

OWNER'S NAME
CHARMAINE Y COLSTON
2019 2ND STREET
LAKE CHARLES LA 70601 N/T: 1

APPLICANT'S SIGNATURE (IF REQUIRED)

VALIDATED BY

25/U TT/CODE	346EYM LICENSE PLATE	09/2023 EXPIRATION	1GNKRJED5BJ220569 V.I.N.			10/06/2021 DATE	1001 DOMICILE
CHEV MAKE	TRV MODEL/WEIGHT	40 BODY	RED/ COLOR	2011 YEAR	113200 ODOMETER	09411835 DL/EIN	ICL CITY LIMITS
4 SCD	MRTO	DEALER CODE	0001 CLASS	SPEC CODES	PRIV AUTO USE	02/2023 OLD EXP	CITATION DATE
	CL FLAGS			F1999405 PREVIOUS TITLE	LA STATE	OLD LIC NO	EXP
U N/U	09/07/2021 DATE ACQUIRED	LPC EFT	CURRENT LA TITLE	TAXABLE VAL MANUF		09/07/2021 TAX DATE	10/06/2021 EFFECTIVE DATE
100.00 SPCV OR VALUE		TRADE VALUE	REBATE	100.00 TAXABLE VALUE			
254 OFFICE NUMBER		REPRINT		HCST			
1750 529 OPER/PID	92 SEQ #	1111111111 MICROFILM #		BATCH/SEQ #			

N/T: 1

STATUS: MAIL-TO

CHARMAINE Y COLSTON
PO BOX 19102
LAKE CHARLES LA 70616

LOUISIANA OFFICE OF MOTOR VEHICLES
MICROFILM/IMAGE COPY

TAX & FEE INFORMATION

ST SALES TAX	4.42	LIC FEE	20.00
ST TAX PNLT		TOW FEE	
ST INTEREST		LIC CRDT	
ST TAX CRDT		LIC PNLT	
ST PNLT CRDT		LIC TRANSFER	
ST VNDRS COMP		LIC PNLT CRDT	
NET ST TAX	4.42	NET LIC FEE	20.00
TOURISM	.03	PARISH FEE	
P/M SALES TAX	5.75	MTC FEE	
P/M TAX PNLT		MISC FEE	
P/M INTEREST		SERVICE HNDL	
P/M DIS TX CRDT		TITLE FEE	68.50
P/M PNLT CRDT		TITLE HNDL	8.00
P/M VNDRS COMP		EXP TITLE FEE	
WHEELCHAIR LIFT		ADMIN FEE	
NET P/M TAX	5.75	S.P. FEE	
TOTAL TAX	10.20	TRUCK ADVISORY	
		TOTAL FEES	96.50
TOTAL: 106.70		REMITTANCE:	

25 10101

TO AVOID REJECTION:
Complete all required information

Louisiana Department of Public Safety and Corrections
Office of Motor Vehicles
P.O. Box 64886, Baton Rouge, LA 70896-4886

VEHICLE APPLICATION

P01
LPC

Date Prepared: 10-6-21 | Type of Plate: auto | ELECTRONIC FUND TRANSFER CODE | DEALER CODE

VIN: 1GNKRJED5BJ220559 | Make: CHEV | License No | Exp Date

Body: 4D | Color: Red | Year: 2011 | Mileage: 113200 | Model/Weight

Name of Owner: Charmaine Y Colston | Driver's License or EIN: [redacted]

Name of Joint Owner (if applicable) | Driver's License or EIN

[redacted]

Are you residing within the corporate limits of municipality? ☑ YES ☐ NO

Are you residing within a special tax district or ward? ☐ YES ☑ NO If yes, what ward or district?

Name: Charmaine Y Colston | ☐ Owner ☐ Lessee, renter, or domicile address | Domicile Code: 1001

Street: [redacted] | Driver's License or EIN of Lessee or Renter

City: | Trade VIN

Trade License No

VEHICLE IS SUBJECT TO SECURITY AGREEMENT AS FOLLOWS:

ELECTRONIC LIEN TRANSFER CODE

First Lienholder's Name | Second Lienholder's Name

Street | Street

City/State/Zip | City/State/Zip

☐ New ☑ Used | Date Acquired: 9-7-21 | Tax Date: 9-7-21 | Previous Title No: P9999405 | State: LA | Cost of Vehicle: 100 | Trade: —

Title Fee	Lic Plate Credit	Handling Fee	Rebate	—	Tax Value: 100
Mortgage Fee	Tax	Tax Fee			
License Fee	*Tax Penalty	Miscellaneous Fee			
Lic Transfer Fee	*Interest	Total Fees			
License Credit	Vendor's Comp	Total Taxes			
License Penalty	Tax Credit	Grand Total			

BE SURE TO SIGN AND DATE

I do swear or affirm that the information contained in this document is true and correct to the best of my knowledge

I have and will maintain, during this registration period, vehicle liability insurance (security) required by LRS Title 32 861-865. Failure to maintain as agreed will be a violation of law which may result in criminal prosecution and/or suspension of registration privileges.

If the vehicle being registered is defined as a commercial motor vehicle by the Federal Motor Carrier Safety Regulations and/or Federal Hazardous Material Regulations, by signature below registrant declares knowledge of those federal regulations.

Charmaine Colston — Applicant's Signature | 10-06-21 — Date

Co-Applicant's Signature | Date

PROOF OF LIABILITY INSURANCE MUST BE FURNISHED AS PROVIDED FOR BY LAW BEFORE THIS FILE CAN BE PROCESSED.

TO AVOID PENALTY AND INTEREST:

File must be submitted within 40 days from the date of purchase. For manufactured houses (mobile homes), file must be submitted by the 20th of the month following the month of delivery.

*Tax Penalty: 5% of sales tax due for 30 days or fraction thereof (not to exceed 25%).

*Interest 1.25% of sales tax due for 30 days or fraction thereof (no maximum).

DUPLICATE TITLE AFFIDAVIT (Must be signed by owner and notarized)

The certificate of title issued to me was ☐ lost ☐ mutilated ☐ never received

I make application for a duplicate copy of said certificate and agree to hold the Commissioner harmless if the previous title is obtained by another person.

☐ I give the Commissioner permission to mail the title to the address on this application

Owner(s)'s Signature(s) for Duplicate Title

Witness | Witness

Sworn and subscribed before me this _____ day of _____, _____

Notary Public Signature, Printed Name | ID Number

AFFIDAVIT OF NON-POSSESSION OF TITLE BY LIENHOLDER
Must be signed by lienholder and notarized.

I hereby swear or affirm that title of above described vehicle showing lien in our favor was ☐ never received ☐ received and surrendered to the owner

Lienholder's Signature

Witness | Witness

Sworn and subscribed before me this _____ day of _____, _____

Notary Public Signature, Printed Name | ID Number

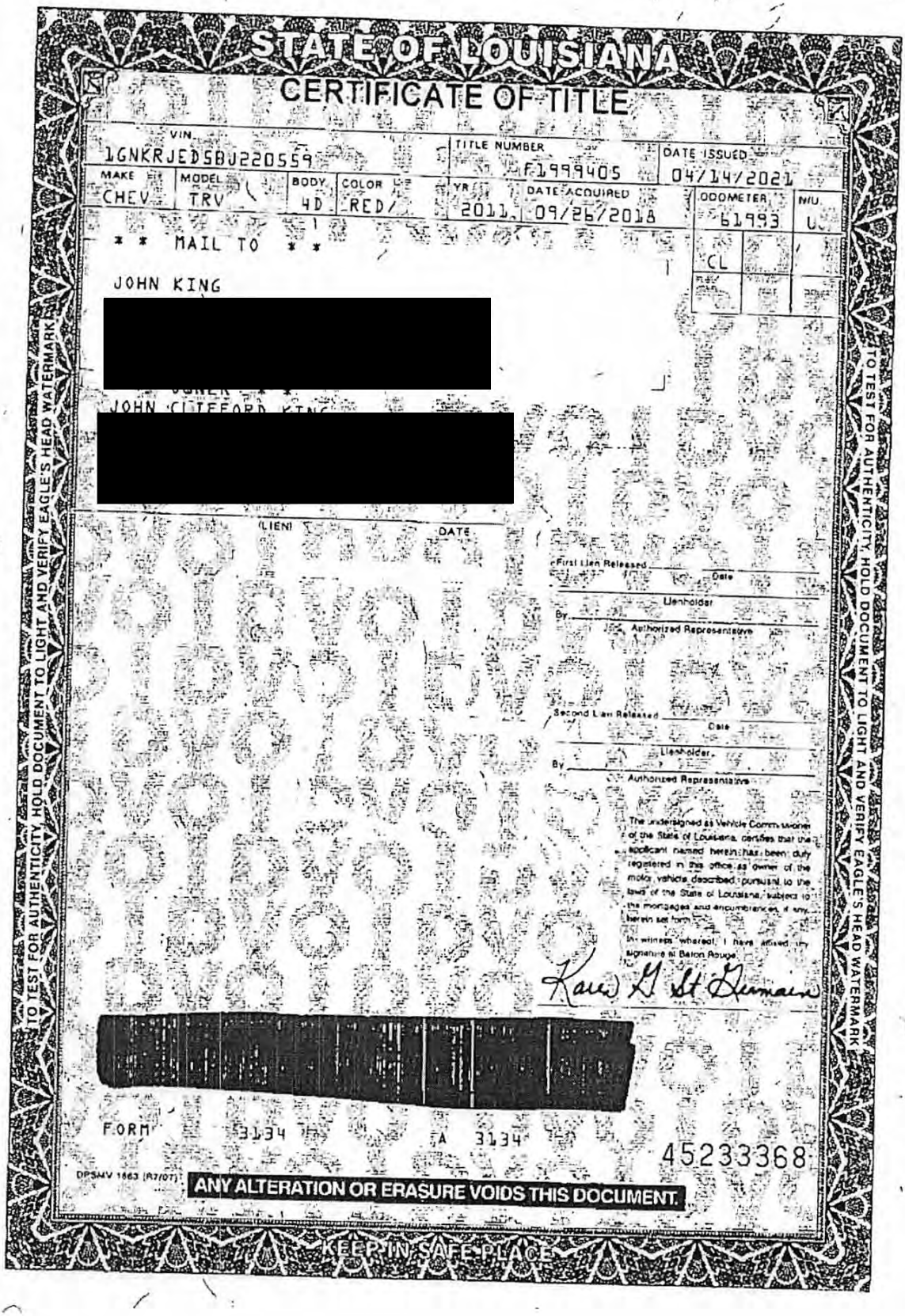
RECEIVED/REJECTION DATE(S)

RECEIVED BY:

OCT 06 2021

PEDERSEN TITLE CO #254

DPSAV 1799 (R01/18)



STATE OF LOUISIANA

CERTIFICATE OF TITLE

TO TEST FOR AUTHENTICITY, HOLD DOCUMENT TO LIGHT AND VERIFY EAGLE'S HEAD WATERMARK

VIN: 1GNKRJED5BJ220559

TITLE NUMBER: F1999405

DATE ISSUED: 04/14/2021

MAKE	MODEL	BODY	COLOR	YR	DATE ACQUIRED	ODOMETER	MIL
CHEV	TRV	4D	RED/	2011	09/26/2018	61993	

* * MAIL TO * *

JOHN KING

[redacted]

JOHN CLIFFORD KING

[redacted]

(LIEN) DATE

First Lien Released Date

Lienholder

By Authorized Representative

Second Lien Released Date

Lienholder

By Authorized Representative

The undersigned as Vehicle Commissioner of the State of Louisiana, certifies that the applicant named herein has been duly registered in this office as owner of the motor vehicle described, pursuant to the laws of the State of Louisiana, subject to the mortgages and encumbrances, if any, herein set forth.

In witness whereof, I have affixed my signature at Baton Rouge.

Karen G St Germain

[redacted]

FORM 3134 A 3134

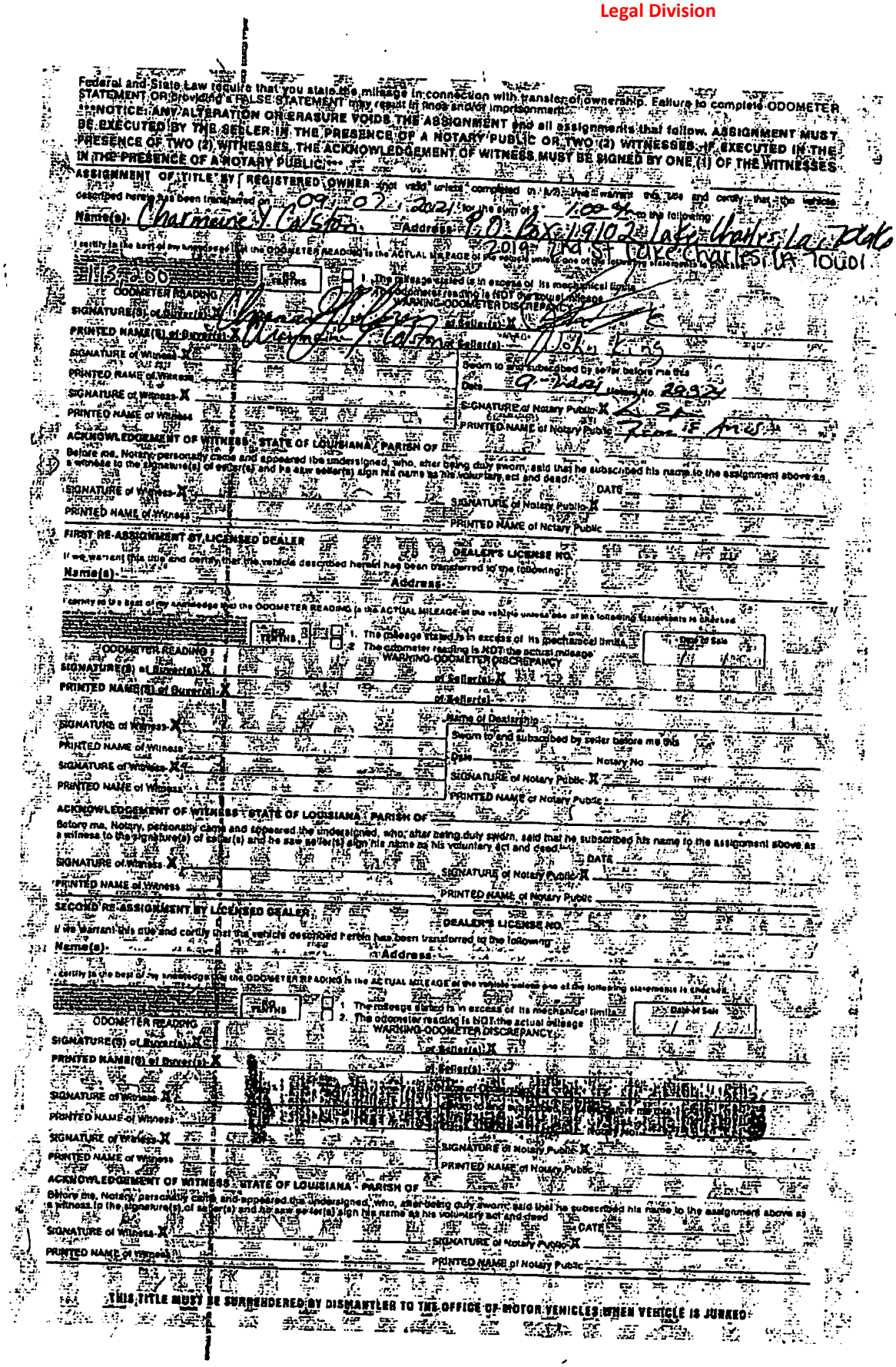
45233368

DPSMV 1663 (R7/07)

ANY ALTERATION OR ERASURE VOIDS THIS DOCUMENT.

KEEP IN SAFE PLACE

TO TEST FOR AUTHENTICITY, HOLD DOCUMENT TO LIGHT AND VERIFY EAGLE'S HEAD WATERMARK



Federal and State Law require that you state the mileage in connection with transfer of ownership. Failure to complete ODOMETER STATEMENT OR providing a FALSE STATEMENT may result in fines and/or imprisonment.

NOTICE: ANY ALTERATION OR ERASURE VOIDS THE ASSIGNMENT and all assignments that follow. ASSIGNMENT MUST BE EXECUTED BY THE SELLER: IN THE PRESENCE OF A NOTARY PUBLIC OR TWO (2) WITNESSES. IF EXECUTED IN THE PRESENCE OF TWO (2) WITNESSES, THE ACKNOWLEDGEMENT OF WITNESS MUST BE SIGNED BY ONE (1) OF THE WITNESSES IN THE PRESENCE OF A NOTARY PUBLIC.

ASSIGNMENT OF TITLE BY REGISTERED OWNER not valid unless completed in full. I/We warrant this title and certify that the vehicle described herein has been transferred on 09-02-2021 for the sum of 1.00 to the following:

Name(s): Charmaine Y. Calston Address: P.O. Box 19102 Lake Charles, LA 70616
2019 3rd St Lake Charles LA 70601

I certify to the best of my knowledge that the ODOMETER READING is the ACTUAL MILEAGE of the vehicle unless one of the following statements is checked.

115200 TENTHS
1. The mileage stated is in excess of its mechanical limits.
2. The odometer reading is NOT the actual mileage. WARNING-ODOMETER DISCREPANCY.
Date of Sale

ODOMETER READING

SIGNATURE(S) of Buyer(s) X
PRINTED NAME(S) of Buyer(s) X
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Witness X
PRINTED NAME of Witness

of Seller(s) X
of Seller(s)
Name of Dealership
Sworn to and subscribed by seller before me this
Date 9-2021 Notary No 29924
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA / PARISH OF
Before me, Notary, personally came and appeared the undersigned, who, after being duly sworn, said that he subscribed his name to the assignment above as a witness to the signature(s) of seller(s) and he saw seller(s) sign his name as his voluntary act and deed.

DATE
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

FIRST RE-ASSIGNMENT BY LICENSED DEALER

If we warrant this title and certify that the vehicle described herein has been transferred to the following:

DEALER'S LICENSE NO.
Name(s):
Address:

I certify to the best of my knowledge that the ODOMETER READING is the ACTUAL MILEAGE of the vehicle unless one of the following statements is checked.

TENTHS
1. The mileage stated is in excess of its mechanical limits.
2. The odometer reading is NOT the actual mileage. WARNING-ODOMETER DISCREPANCY.
Date of Sale

ODOMETER READING

SIGNATURE(S) of Buyer(s) X
PRINTED NAME(S) of Buyer(s) X
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Witness X
PRINTED NAME of Witness

of Seller(s) X
of Seller(s)
Name of Dealership
Sworn to and subscribed by seller before me this
Date Notary No
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA / PARISH OF
Before me, Notary, personally came and appeared the undersigned, who, after being duly sworn, said that he subscribed his name to the assignment above as a witness to the signature(s) of seller(s) and he saw seller(s) sign his name as his voluntary act and deed.

DATE
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

SECOND RE-ASSIGNMENT BY LICENSED DEALER

If we warrant this title and certify that the vehicle described herein has been transferred to the following:

DEALER'S LICENSE NO.
Name(s):
Address:

I certify to the best of my knowledge that the ODOMETER READING is the ACTUAL MILEAGE of the vehicle unless one of the following statements is checked.

TENTHS
1. The mileage stated is in excess of its mechanical limits.
2. The odometer reading is NOT the actual mileage. WARNING-ODOMETER DISCREPANCY.
Date of Sale

ODOMETER READING

SIGNATURE(S) of Buyer(s) X
PRINTED NAME(S) of Buyer(s) X
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Witness X
PRINTED NAME of Witness

of Seller(s) X
of Seller(s)
Name of Dealership
Sworn to and subscribed by seller before me this
Date Notary No
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

ACKNOWLEDGEMENT OF WITNESS - STATE OF LOUISIANA / PARISH OF
Before me, Notary, personally came and appeared the undersigned, who, after being duly sworn, said that he subscribed his name to the assignment above as a witness to the signature(s) of seller(s) and he saw seller(s) sign his name as his voluntary act and deed.

DATE
SIGNATURE of Witness X
PRINTED NAME of Witness
SIGNATURE of Notary Public X
PRINTED NAME of Notary Public

THIS TITLE MUST BE SURRENDERED BY DISMANTLER TO THE OFFICE OF MOTOR VEHICLES WHEN VEHICLE IS JUNKED.



2019 2nd St
LC 70601

2021-00123665 Supplemental

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Supplemental Report
Complaint # 2021-00123665
Investigating Detective: Kent Castille

Suspect: Charmaine Colston (B/F)
Charge: LA R.S. 14:72 Forgery
14:67.26.C.2 Theft of Motor Vehicle from $5,000 but less than $25,000

Victim: John King (B/M)

Attachments:
3. Vehicle Title Information
4. King's Bank Statements
5. Southwest Louisiana Credit Union Documents
6. King's Work Documents

Evidence / Veripic Available Upon Request:
Audio Statement of John King

On October 12, 2021, I, Detective Kent Castille, was assigned a Forgery case for follow up investigation.

On October 18, 2021, I spoke with victim, John King, over the phone and obtained an audio statement in reference to a Forgery. King stated he learned his vehicle, 2011 red Chevrolet Traverse VIN 1GNKRJED5BJ22055 bearing the Louisiana License Plate 346EYM, was fraudulently forged into the subject's name, Charmaine Colston. King claimed he and Colston were in a romantic relationship that has since been terminated and during their relationship, King purchased the stated vehicle and listed it under his name only. King stated he and Colston were never married, had children together, and suffered a traumatic breakup. King allowed Colston to utilize his vehicle during and after the course of their relationship. King moved to New Jersey and left the stated vehicle at his mother's residence of 123 Louisiana Avenue and continued to allow Colston to utilize the vehicle. King stated he left one copy of the vehicle keys with his mother and one with Colston. King claimed he made most of the payments on the vehicle but Colston had assisted, unknown how much was contributed by either party. King claimed Colston obtained a copy of the title by placing her address as a secondary address for the title to be mailed to, the address being P.O. Box 19102 Lake Charles, LA. King stated he never authorized any secondary address for the vehicle title and the only address listed should have been 123 Louisiana Avenue. King stated he only allowed Colston to utilize the stated vehicle but never consented to her possessing ownership of it. King claimed he believed Colston obtained the vehicle title through Southwest Louisiana Credit Union (SWLACU) who he utilized to obtain a loan to purchase the vehicle. King stated he purchased the vehicle for an estimated $15,000.00.

On October 19, 2021, I traveled to Thib's Auto Titles and Tags, Inc (located on 3620 Gerstner Memorial Blvd) and requested a copy of the current title of the stated vehicle. Thib's employees were able to inform me the title was processed at Pedersen Title Co (located on 0411, 1700 E Prien Lake Rd #8) during the early part of October. I traveled to Pedersen and obtained a copy of the current title of the vehicle and noticed it was notarized on September 7, 2021, by Renee E Amos (ID 29374.) On the stated title was King's signature on the seller line. Pedersen employees were able to inform me Colston processed the title at the business on October 6, 2021. I was not able to review video footage of the transaction until October 25, 2021, due to the manager not being present. Once I reviewed the video surveillance, I observed a black female wearing a black V neck shirt, blue jeans, and sunglasses on October 6, 2021, at the hour of 1149AM. I was able to identify the female in the video footage as Colston. Due to a technical error with Pedersen's security system, I was unable to obtain a copy of the incident.

On October 26, 2021, I spoke with Amos over the phone and she stated all of her notary transactions require all parties to be present with their credentials. Amos claimed she had no memory of the specific transaction between King and Colston and stated she does not maintain any records as she is not required to by law. Amos specified numerous times during our conversation that she requires all parties to be physically present with their credentials. Amos claimed she had only conducted a few transactions through an online webcam and was confident the stated transaction was not done that way.

On October 26, 2021, I received a detailed copy of the vehicle's title from the email address of Franzel.Doucet@la.gov. I observed a Vehicle Application form that was processed by Colston and the current title of the stated vehicle. The title of the vehicle listed only King's name along with the two addresses of P.O. Box 19102 and 123 Louisiana Drive on the front. Attached was also a photo copy of Colston's Louisiana Driver's License that she produce to finalize the transaction. Attached was the current vehicle registration which showed the vehicle was sold and purchased for the price of $100.00 (listed on registration as "SPOV or Value.") The registration also listed Colston as the vehicle owner with the address of P.O. Box 19102.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

I attempted to contact Colston by phone (337-438-9036 and 337-499-6021) but both phone numbers were disconnected. On October 26, 2021, I traveled to 1225 Country Club Rd, #5107, to attempt to speak with Colston. I received no answer at the door and left a card requesting a call back. On October 28, 2021, I received a call from Wilford Carter Law, LLC stating Carter will be representing Colston in regards to a case involving a Forgery. I began also receiving numerous calls from a Private phone number with my work office phone. I was not present at my desk to answer the stated phone calls and no voicemails were left. On October 29, 2021, I was able to answer a phone call from the Private number. As I answered the phone call, Colston identified herself and without being prompted in any way, Colston stated King provided consent for her to obtain ownership of his vehicle. I asked Colston if she would be willing to provide me a statement in person and she began discussing how King gave her permission to write his signature on the vehicle title. I was unable to record the conversation and I only vocalized the possibility of Colston providing me with a statement. Colston provided me with her most recent phone number, 337-526-1992, and continued to defend herself stating she was authorized by King to take ownership of his vehicle.

On October 28, 2021, I traveled to SWLACU and met with employees. I was informed the vehicle was purchased only under King's name and that Colston had filed a "Member to Member Authorization Form." I was informed this form was filed to allow Colston to make payments to King's account. Upon obtaining a copy of the stated form, I observed Colston listed the relationship to King as "Husband" with the two never being married. The form was processed on March 14, 2017, and had the member ID of Colston (1000059007) and King (1000058944) listed. Employees were able to inform me that they were contacted by King, who accused them of mistakenly giving Colston the title to his vehicle. I was informed the vehicle title was mailed to Colston due to the P.O. Box 19102 address having been placed on the title when the vehicle registration last renewed through the state. King confirmed he was not the one who renewed the vehicle registration and believed it was done by Colston. SWLACU had no part in mailing the vehicle title or dictating who would receive the stated title.

On November 2, 2021, I received, by email, from King, two documents that he completed with his job during the day of September 7, 2021, in New Jersey. The documentation stated King was in New Jersey conducting his professional duties at the location of 1640 New Market Ave, S. Plainfield, NJ 07080. The documentation stated King was occupied at the stated location from 12:00PM to 08:30PM. King also submitted his bank statements during the month of September to prove that he was not in or capable of being present in Louisiana when the vehicle title was transferred to Colston and notarized.

On November 2, 2021, I received a call from Carter who stated Colston will not provide a statement to me. Carter claimed the only information that Colston can provide is that she was authorized by King to transfer the vehicle title to her name.

This case is being forwarded to the District Attorney's Office for review.

All documents, audio, video and photos (if any) have been imported into the Aegis case, CPSO Portal and Veripic System. I observed numerous forms of documentation stating Colston to be the new registered owner of the stated vehicle with a photo copy of her Driver's License which she produced to finalize the process.

No further information at this time.
End of Report
Detective: Kent Castille
[redacted]

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Case Report

Summary

Print Date/Time: 08/25/2022 11:25
Login ID: cpsoapps\mhamolka
Case Number: 2021-00147277

Calcasieu Parish Sheriff's Office
ORI Number: LA0100000

Case

Case Number: 2021-00147277
Location: 123 LOUISIANA AVE
LAKE CHARLES, LA 70601
Reporting Officer ID: 12808 - Phillips

Incident Type: Forgery/Fraud
Occurred From: 12/09/2021 13:15
Occurred Thru: 12/09/2021 13:15
Disposition:
Disposition Date:
Reported Date: 12/09/2021 13:15 Thursday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	13B	14:38	Simple Assault	1
2	State	250	14:72	Forgery	1
3	State	250	14:133	Filing or Maintaining False Public Records	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect	1	Colston, Charmaine Yvette	[redacted]		Black	Female	[redacted] 32
Suspect	2	King, John Clifford			Black	Male	[redacted] 35
Victim	1	Society					
Victim	2	King, John Clifford			Black	Male	[redacted] 35

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.

Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License Plate	State

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

OFFENSE REPORT CHECKLIST

The following are tasks that should be completed prior to a report being submitted to the prosecutor.

JBL The investigation is either complete or in a state where a report needs to be submitted.

JBL The report indicates that, if applicable, the victim or victim's family has been contacted and informed of the status of the investigation.

JBL The report indicates that, all items of evidence collected have been properly submitted to evidence, records or photographic services and either scanned into the CPSO computer system by the assigned investigative assistant or investigator.

JBL The report contains an exhaustive list of items collected, whether stored in records or evidence, and the list of items collected has been placed on the CPSO Offense Report Receipt to make it easy for the prosecutor to see what information he/she should have access to for immediate consideration.

JBL The report has been preserved in the appropriate CPSO computer program and all available evidentiary attachments have been scanned into the CPSO computer system.

JBL A copy of all evidentiary items that can be replicated, digitally or otherwise, is attached to the report. This may not be necessary in certain limited circumstances.

N/A If the investigation is ongoing, that fact has been referenced in the original report to put the prosecutor on notice that more information may be available at a later date.

N/A If applicable, any in car video needed as evidence has been properly tagged and Photographic Services has been notified to transfer said video to the D.A.'s Server.

This report, complaint # 2021-00147277 , and the associated evidentiary attachments are ready to be submitted to the District Attorney's Office for review.

James Leubner
Supervisor's Signature

6/9/2022
Date

James Leubner
Supervisor's printed name

Financial Crimes
Division

NOTES: ____

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office
TONY MANCUSO, SHERIFF AND EX-OFFICIO TAX COLLECTOR
Parish of Calcasieu • 5400 E. Broad Street • Lake Charles, LA 70615
Phone (337) 491-3700 • Fax (337) 494-4522

CPSO OFFENSE REPORT RECEIPT

Complaint # 2021-00147277 Investigating Deputy Kent Castille

List of evidentiary items attached to the report for consideration by D.A.'s Office:

1. Initial Report
2. J. Bruns Supplemental Report
3. K. Castille Supplemental Report
4. King Life Insurance
5. State Farm – King Email
6. King Email Statement
7. State Farm Subpoena
8. Colston Email Statement
9. Ambrose Statement
10. Harris Statement
11. Colston Documents

RECEIVED
JUN 13 2022
DA / INTAKE

Date Time

Signature of D.A. Representative receiving report

If there is a question or a need for immediate assistance associated with this report; the investigating officer may be contacted by email. Please always copy the listed supervisor.

Investigating Deputy Kent Castille

CPSO Supervisor James Leubner

DA Review 21-147277 (Charmaine Colston)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

STEPHEN C. DWIGHT
District Attorney
FOURTEENTH JUDICIAL DISTRICT
CALCASIEU PARISH

JACOB L. JOHNSON
First Assistant
DISTRICT ATTORNEY

P.O. Box 3206
Lake Charles, LA 70602
Phone: 337-437-3400
Fax: 337-437-3325

July 15. 2022

Calcasieu Parish Sheriff's Office
Kent Castille, 10450
Report #: 21-147277

Defendant: Charmaine Yvette Colston B/F DOB: [redacted]

Action/Status	Statute	Charge	Offense Date	Warrant
RF Insufficient Evidence	14:72.A	Forgery	12/09/2021	

NOTES/COMMENTS/OTHER REQUIREMENTS:

REVIEWED BY: **Joseph Williams**

The information requested MUST be forwarded to this office within THIRTY (30) DAYS of the date of this advisement. When forwarding a follow-up and/ or warrant, please attach a copy of this advisement.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

STEPHEN C. DWIGHT
District Attorney
FOURTEENTH JUDICIAL DISTRICT
CALCASIEU PARISH

JACOB L. JOHNSON
First Assistant
DISTRICT ATTORNEY

P.O. Box 3206
Lake Charles, LA 70602
Phone: 337-437-3400
Fax: 337-437-3325

July 15. 2022

Calcasieu Parish Sheriff's Office
Kent Castille, 10450
Report #: 21-147277

Defendant: John Clifford Joseph King B/M DOB: [redacted]

Action/Status	Statute	Charge	Offense Date	Warrant
RF Insufficient Evidence	14:133	Filing or Maintaining False Public Records	12/09/2021	

NOTES/COMMENTS/OTHER REQUIREMENTS:

REVIEWED BY: **Joseph Williams**

The information requested MUST be forwarded to this office within THIRTY (30) DAYS of the date of this advisement. When forwarding a follow-up and/ or warrant, please attach a copy of this advisement.

OfficerID: CPSOAPPS\ephillips, Supplemental Narrative

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

On December 9, 2021, at approximately 1315 hours, I, Sgt. Elliott Phillips was working the front Administration Desk, when a forgery complaint was being reported.

Sgt. Phillips, spoke with the complainant, John King, who stated his ex-girlfriend has been threatening him. King, stated his ex-girlfriend, Charmaine Colston has opened a $600,000 life insurance policy in his name. King stated the policy was opened at State Farm and was opened sometime in 2020. King, also stated Colston had transferred a $50,000 policy to her account from his, but State Farm has since corrected that account. King, stated he never signed any policy with State Farm as Colston the beneficiary, and that she forged his signature. King stated he and Colston were together for several years, also had two kids together. King advised Colston has been sending him threatening emails and text messages, stating he was going to kill him. King was very upset by this incident since Colston opened up the life insurance policy and she has been saying she was going to kill him.

King had a prepared statement ready for Detectives, that he would email to the Detective that contacts him. King also had several messages and the policy information that Colston opened up. King was advised a report would be done on the incident and Detectives would be in contact with him.

NOTE: King stated he works out of town a lot, but Detectives could contact him on his cell phone. King also provided his email, johncjking86@gmail.com

EOR/NFI
Sgt. Elliott Phillips 12808

2021-00147277 Supplemental Report

Supplemental Report
Complaint # 2021-00147277
Associated Case # 2021-00123665
Investigating Detective: Sgt. Joshua Bruns

Suspect 1: Charmaine Colston (B/F)
Charge: LA R.S. 14:38 Simple Assault
LA R.S. 14:72 Forgery

Victim 1: John King (W/F)

Attachments: N/A

Evidence Available Upon Request:
Audio Interview with John King

On December 10, 2021, I, Detective Sgt. Joshua Bruns was assigned a Forgery case for follow up investigation.

On January 3, 2022, I conducted an audio recorded interview with the victim, John King. He advised that in May or June of 2021, he discovered that the subject, Charmaine Colston, had a life insurance policy taken out on him. He stated that Colston used to be his girlfriend but that they are no longer in a relationship. Colston stated that she has threatened to kill him previously. He said these threats occurred as far back as 2004. King advised that the policy was held at State Farm and Don Harris was the agent. King advised that he was aware that they were looking at policies when they were dating. He also advised that he submitted to a blood test for the policy, but he stated he didn't sign the document.

On January 24, 2022, I went to Don Harris' office located at 1614 Hwy 14 in Lake Charles. I spoke with Tony Guillory about this investigation. He advised that the policy had been opened since 2018. He also stated that King would have needed to be present for the policy to have even been enacted. He stated that the total policy amount was for $25,000.00.

On February 7, 2022 at 0917 hours, I attempted to contact Colston regarding this investigation and the phone number is not accepting calls at this time.

On February 7, 2022 at 0919 hours, I spoke with Guillory again at Don Harris State Farm. Guillory advised that he would need Colston's authorization to give a recorded statement regarding the policy.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185 Lake Charles LA 70602
Legal Division

While working this investigation I learned that King had also filed other reports in which he stated that Colston had forged his information. I located CPSO Case # 2021-00123665 which was worked by Detective Kent Castille. In that case report Det. Castille was advised that Colston was being represented by Wilfred Carter. I contacted Carter's office to try and obtain a statement from Colston. I was advised that Colston is not represented by them at this time.

On February 14, 2022, I am submitting this case to the District Attorney's office. A secondary supplemental will be submitted if contact with Colston is made.

All documents, audio, video and photos (if any) have been imported into the Aegis case, CPSO Portal and Veripic System.

No further information at this time.
End of Report
Detective: Sgt. Joshua Bruns (10120)
[redacted]

2021-00147277 2nd Supplemental

2nd Supplemental Report
Complaint # 2021-00147277
Investigating Detective: Kent Castille

Suspect: Charmaine Colston (B/F)
Charge: LA R.S. 14:72 Forgery
14:38 Simple Assault (Unfounded)

John King (B/M)
LA R.S. 14:133 Filing or Maintaining False Public Records

Victim: John King (B/M)
Society

Attachments:
3. King Life Insurance
4. State Farm – King Email
5. King Email Statement
6. State Farm Subpoena
7. Colston Email Statement
8. Ambrose Statement
9. Harris Statement
10. Colston Documents

Evidence / Veripic Available Upon Request:
State Farm Documents

On March 10, 2022, I, Detective Kent Castille, was reassigned a Forgery case for follow up investigation.

I am the lead detective of CPSO Case 2021-00123665, which involved both John King and Charmaine Colston. During the investigation, King provided documentation of Colston and he communicating after the claim of Colston making threats on his life. In CPSO Case 2021-00147277, King stated he did not feel safe communicating with Colston but admitted to openly communicating with Colston in CPSO Case 2021-00123665.

On March 21, 2022, Detective James Leubner and I met with Assistant District Attorney Ross Murray at the Calcasieu Parish District Attorney's Office. The matter of creating a life insurance policy for a separate individual, weather with or without that separate individual's consent, was established to not be a criminal matter.

On March 22, 2022, I attempted to contact King by the phone number of 337-488-5663 but the phone number appeared to no longer be operational. I attempted to call King at the phone number of 318-433-0964 but my call was not answer and I could not leave a

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

voicemail. I later received a call from King and his attorney (believed to be Aminah Massenburg.) During the conversation, Massenburg and King were adamant that Colston forged King's signature to create insurance policies and fraudulently obtained ownership of other insurance policies from King. I was not able to obtain a clear timeline of events that King and Massenburg were attempting to describe and I asked King to email me statement detailing all issues. On April 20, 2022, I obtained King's statement from his email account of johncjking86@gmail.com. Within King's statement, he stated "Jennifer Ambrose processed to illegally and without cause illegally transfer the existing policy from 2018 that I owned and rerolled the cash value into TWO entire new policies owned completely by my ex girlfriend Charmaine Y Colston." King stated Ambrose and Colston were the individuals responsible for the fraudulent activity that he claimed on his insurance policies.

On March 25, 2022, I traveled to State Farm Insurance (1614 Highway 14) and spoke with Jennifer Ambrose in reference to King's insurance policies. Ambrose stated King was lying about his signature being forged on the documents and that she remembers him signing them. Ambrose stated she was the State Farm employee who processed the policies created by King and Colston. Ambrose stated King authorized the creation of policies under Colston's account, making Colston the owner of the policies. Ambrose provided me with a copy of an email conversation between King and Don Harris (who at the time was the manager of the State Farm location.) Along with the stated email conversation was a signed letter from King to Harris. King stated nothing about the policies being specifically fraudulent but mentioned that he was not wanting Colston to have a life insurance policy on himself. King stated that Colston was not his spouse but yet still "has an active spousal policy on me".

While I spoke to Ambrose, she contacted Harris and the three of us briefly communicated. Ambrose and Harris both stated King created the policies (the same policies he is claiming to be fraudulent) on his own will and that no person forged his signature on anything. I asked Ambrose and Harris if they would each provide me a written statement about the matter. Both individuals agreed and later submitted the written statements to me indicating that King is making a false claim about the insurance policies being fraudulent in any way.

Ambrose informed me that State Farm Insurance had conducted an investigation of the matter and made the conclusion that no fraudulent activity occurred with any of the policies associated with King. I issued a subpoena to State Farm requesting all documents within their investigation. Upon receiving the requested documents, I did not observe any final decision on their investigation. I contacted State Farm corporate office and was informed that no formal investigation was actually conducted. Instead, State Farm employees reviewed the notes provided by Ambrose and Harris and determined that no fraudulent activity occurred.

I contacted Colston by phone and she stated she would submit a typed statement to me through email. On May 4, 2022, I obtained an email from Colston containing a typed statement in reference to this investigation. Within the statement, Colston stated King "has gone to these extreme measures to falsify police reports" in reference to the insurance policies. Within Colston's statement, she stated that the created insurance policies and changes to the insurance policies were made with the consent and authorization of both herself and King.

On June 7, 2022, Colston submitted documentation of a pretrial conference that occurred on May 31, 2022. The document stated "There has been no insurance fraud on behalf of Ms. Colston." The stated documentation had a signature line for "DISTRICT JUDGE" and "Deputy Clerk of Court" on the last page but no signature was present in either line. I reviewed the Clerk of Courts records online and discovered that one May 31, 2022, the following events were documented: "HRNG. OFFC.CONF.FIXED FOR", "TRAIL DATE", "STILPULATIONS", two disbursements, and a minute entry fee. I was not able to locate the documentation provided by Colston through the Clerk of Courts.

This case is being forwarded to the District Attorney's Office to review charges for both King and Colston.

All documents, audio, video and photos (if any) have been imported into the Aegis case, CPSO Portal and Veripic System.

No further information at this time.
End of Report
Detective: Kent Castille
[redacted]

3. King Life Insurance

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division
21-0147277

+++++LF380591952019102505E01707718167409

State Farm Life Insurance Company
PO Box 2364
BLOOMINGTON IL 61702-2364
Telephone (855)534-0227

POLICY NUMBER	Annual Notice of Policy Status	DATE DUE	PLEASE PAY THIS AMOUNT
[redacted]		NOV 16 2019	NONE

E017077
JOHN-CLIFFORD JOSEPH KING, SR
[redacted]

INSURED
JOHN-CLIFFORD JOSEPH KING, SR

ST-0101-0000

POLICY DATE INFORMATION - Your policy is dated November 16, 2018. This notice provides information as of November 16, 2019.

PAYMENT DUE INFORMATION - No amount is due. Payments are made on the State Farm Payment Plan. Your one-month premium is $50.81. Your annualized premium is $609.72.

CASH VALUE INFORMATION - As of November 16, 2019, your policy will have no cash value and no cash surrender value.

INSURANCE INFORMATION	Insurance Amount
20 Pay Life	$25,000.00

Your policy includes Waiver of Premium Disability.

BENEFICIARY INFORMATION - The beneficiary designation is an important part of your policy. Your beneficiary designation is:

Primary: CHARMAINE COLSTON-KING, SPOUSE
Successor: DWADE COLSTON, BROTHER/SISTER

Note: Probate laws may disqualify a policy owner's former spouse from receiving life insurance proceeds. You should update your beneficiary designation if your marital status changes and you want your former spouse to receive the proceeds of this policy.

1307685 03-05-2018 &03182

IMPORTANT POLICYOWNER NOTICE - You should consider requesting more detailed information about your policy to understand how it may perform in the future. You should not consider replacement of your policy or make changes in your coverage without requesting a current illustration. You may annually request, without charge, a current illustration by calling your agent at (337) 439-2747, or by writing or calling State Farm Insurance at the address listed on this notice. If you do not receive a current illustration of your policy within 30 days from your request, you should contact your state insurance department.

All amounts shown are subject to verification. See reverse side for important information.

Thanks for letting us serve you . . .

Agent: DON HARRIS

Telephone: (337) 439-2747

Prepared OCT 25 2019

State Farm Life Insurance Co (Not Licensed in MA, NY, or WI)/ State Farm Life and Accident Assurance Co (Licensed in NY and WI)

IF YOU HAVE MOVED, PLEASE CONTACT STATE FARM

INSURED	JOHN-CLIFFORD JOSEPH KING, SR
POLICY NUMBER	[redacted]

PLEASE RETURN THIS PART WITH YOUR CHECK MADE PAYABLE TO STATE FARM

DATE DUE	PLEASE PAY THIS AMOUNT
NOV 16 2019	NONE

Your cancelled check is your receipt. Any check, draft, or money order received is subject to collection.

State Farm Life Insurance Company
PO Box 2364
BLOOMINGTON IL 61702-2364

For office use only

ANNUAL CONTACT	LIFE		1025

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21 0147277

+++++LF380591952020102405E04265918167409

State Farm Life Insurance Company
PO Box 2364
BLOOMINGTON IL 61702-2364
Telephone (855)534-0227

POLICY NUMBER		DATE DUE	PLEASE PAY THIS AMOUNT
[redacted]	Annual Notice of Policy Status	NOV 16 2020	NONE

E042659
JOHN-CLIFFORD JOSEPH KING, SR
[redacted]

INSURED
JOHN-CLIFFORD JOSEPH KING, SR

ST-0101-0000

POLICY DATE INFORMATION - Your policy is dated November 16, 2018. This notice provides information as of November 16, 2020.

PAYMENT DUE INFORMATION - No amount is due. Payments are made on the State Farm Payment Plan. Your one-month premium is $50.81. Your annualized premium is $609.72.

DIVIDEND INFORMATION - You elected to have your dividends buy additional paid-up insurance. Your paid-up dividend additions total $172.62. This includes your current dividend of $35.75, which purchased paid-up dividend additions of $172.62.

CASH VALUE INFORMATION - Your cash value is $76.00--an increase of $76.00 from last year. This total includes $35.75, which is the cash value of your paid-up dividend additions.

As of November 16, 2020, the cash surrender value will be $76.00.

INSURANCE INFORMATION	Insurance Amount
20 Pay Life	$25,000.00
Paid-up Dividend Additions	172.62
TOTAL	$25,172.62

Your policy includes Waiver of Premium Disability.

1307885 03-05-2018 A03168

BENEFICIARY INFORMATION - The beneficiary designation is an important part of your policy. Your beneficiary designation is:

Primary: CHARMAINE COLSTON-KING, SPOUSE
Successor: DWADE COLSTON, BROTHER/SISTER

Note: Probate laws may disqualify a policy owner's former spouse from receiving life insurance proceeds. You should update your beneficiary designation if your marital status changes and you want your former spouse to receive the proceeds of this policy.

All amounts shown are subject to verification. See reverse side for important information.

Thanks for letting us serve you . . .

Agent: DON HARRIS

Telephone: (337) 439-2747

Prepared OCT 24 2020

State Farm Life Insurance Co (Not Licensed in MA, NY, or WI)/ State Farm Life and Accident Assurance Co (Licensed in NY and WI)

IF YOU HAVE MOVED, PLEASE CONTACT STATE FARM

INSURED JOHN-CLIFFORD JOSEPH KING, SR

POLICY NUMBER [redacted]

PLEASE RETURN THIS PART WITH YOUR CHECK MADE PAYABLE TO STATE FARM

DATE DUE	PLEASE PAY THIS AMOUNT
NOV 16 2020	NONE

Your cancelled check is your receipt. Any check, draft, or money order received is subject to collection.

State Farm Life Insurance Company
PO Box 2364
BLOOMINGTON IL 61702-2364

For office use only

ANNUAL CONTACT | LIFE | | 1024

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division 21 - 0147277

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Information continued for policy LF-3805-9195
Prepared October 24, 2020

IMPORTANT POLICYOWNER NOTICE - You should consider requesting more detailed information about your policy to understand how it may perform in the future. You should not consider replacement of your policy or make changes in your coverage without requesting a current illustration. You may annually request, without charge, a current illustration by calling your agent at (337) 439-2747, or by writing or calling State Farm Insurance at the address listed on this notice. If you do not receive a current illustration of your policy within 30 days from your request, you should contact your state insurance department.

132931.3 12-29-2010 (L05000)

When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information on your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment, and you will not receive your check back from your financial institution.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division 21 - 0147277

STATE FARM LIFE INSURANCE COMPANY

HOME OFFICE, 1 STATE FARM PLAZA, BLOOMINGTON, ILLINOIS 61710

StateFarm

Insured	JOHN-CLIFFORD JOSEPH KING, SR (Male)
Age	32
Policy Number	[redacted]
Policy Date	November 16, 2018
Basic Plan Amount	$25,000
Total Initial Amount	Re-Issued As Requested

This Policy is based on the Application and the payment of premiums to the Policy Anniversary shown under the heading Premiums Payable on page 3 while the Insured lives. State Farm Life Insurance Company will pay the Proceeds to the Beneficiary when due proof of the Insured's death is received.

30-Day Right to Examine this Policy. This Policy may be returned within 30 days of its receipt for a refund of all premiums paid. However, if You indicated on the Application for this Policy it will replace a life insurance or annuity policy, a longer period may be required by law in the state in which this Policy is delivered. Return may be made to State Farm Life Insurance Company or one of Our agents. If returned, this Policy will be void from the Policy Date.

Read this Policy with care. This is a legal contract between You and State Farm Life Insurance Company. In the event You need to contact someone about this Policy for any reason, please contact Your State Farm agent. If You have additional questions, You may contact Us at Our Home Office or (855) 534-0228 or www.statefarm.com.

Michael J. Tipsord

President

Lynne M. Youell

Secretary

BASIC PLAN DESCRIPTION

Whole life insurance with premiums payable to the Policy Anniversary shown under Premiums Payable on page 3 while the Insured is alive. Insurance is payable when the Insured dies. The Basic Plan is eligible for Annual Dividends.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division
21 0147277

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The Important Information follows page 2. The Application and any Riders and Endorsements follow page 12.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division
21 - 0147277

IMPORTANT INFORMATION

In the event You need to contact someone about this Policy for any reason, please contact Your State Farm agent. If You have additional questions, You may contact Us at statefarm.com® or the phone number shown on page 1.

If You have been unable to contact or obtain satisfaction from Your State Farm agent or Us, You may contact the insurance supervisory official where this Policy was issued. The phone numbers are shown below:

Alabama	334-269-3550	**Maine**	207-624-8475	**Oklahoma**	405-521-2828
Alaska	907-269-7900	**Maryland**	410-468-2090	**Oregon**	503-947-7984
Arizona	602-364-2499	**Massachusetts**	617-521-7794	**Pennsylvania**	717-787-2317
Arkansas	501-371-2600	**Michigan**	877-999-6442	**Puerto Rico**	787-304-8686
Colorado	303-894-7499	**Minnesota**	651-539-1500	**Rhode Island**	401-462-9520
Connecticut	860-297-3800	**Mississippi**	800-562-2957	**South Carolina**	803-737-6180
Georgia	404-656-2056	**Missouri**	573-751-3365	**Tennessee**	615-741-2241
Hawaii	808-586-2790	**Montana**	406-444-2040	**Texas**	800-252-3439
Idaho	208-334-4250	**Nebraska**	402-471-2201	**Utah**	801-538-3800
Illinois	217-782-4515	**Nevada**	775-687-0700	**Vermont**	802-828-3301
Indiana	317-232-2385	**New Hampshire**	603-271-2261	**Virginia**	804-371-9741
Iowa	515-281-5705	**New Jersey**	609-292-7272	**Washington**	360-725-7000
Kansas	785-296-3071	**New Mexico**	505-827-4601	**West Virginia**	304-558-3354
Kentucky	502-564-3630	**North Carolina**	855-408-1212	**Wisconsin**	608-266-3585
Louisiana	800-259-5300	**Ohio**	614-644-2658	**Wyoming**	307-777-7401

When contacting Your State Farm agent, Us, or the insurance supervisory official, please have the Policy Number for this Policy available.

ICC16 17904 20161101

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PO Box 2185, Lake Charles, LA 70602
Legal Division

POLICY IDENTIFICATION

Insured	JOHN-CLIFFORD JOSEPH KING, SR (Male)	Age	32
Policy Number	[redacted]	Basic Plan Amount	$25,000
Policy Date	November 16, 2018	Total Initial Amount	Re-issued As Requested
Issue Date	November 26, 2018	Policy Class	1
Owner	JOHN-CLIFFORD JOSEPH KING, SR		

SCHEDULE OF BENEFITS

Form	Description	Initial Amount	Benefit Period Ends	Annual Premium	Premiums Payable
11002	Basic Plan (20 Pay Whole Life) Class of Risk: Standard Male Non-Tobacco	$25,000	With Life	$578.75	To 2038
10200	Waiver of Premium *Shown below for each life insurance benefit Class of Risk: Standard Male Non-Tobacco Basic Plan		In 2038	* $5.25	To 2038

SCHEDULE OF PREMIUMS

Beginning	Annual	Semi-Annual	Quarterly	Monthly
November 16, 2021	$584.00	$299.01	$151.26	$50.81

If the premium paid is not the annual premium, the total amount of premium due each year is greater than the annual premium. Premiums other than the annual premium are increased to reflect the time value of money. Monthly premiums must be paid under one of the monthly payment plans made available. The premiums shown above include a policy fee. The policy fee for the annual premium is $50.00, for the semi-annual premium is $25.60, for the quarterly premium is $12.95, and for the monthly premium is $4.35.

ANNUAL DIVIDENDS

This Policy is eligible for annual dividends, but dividends are not guaranteed. The minimum Dividend Accumulation interest rate is 1% per year. See the Dividend Provisions on page 9.

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SCHEDULE OF INSURANCE AND VALUES

- Insurance Amount - On Insured	Nov 16,	Guaranteed Values: End of Policy Year	Cash Value Dollars	Paid Up Insurance Dollars	Extended Term Ins Yrs	Extended Term Ins Days
$25,000	2020	2	40.25	200	1	139
25,000	2021	3	423.25	1,975	11	224
25,000	2022	4	821.00	3,700	18	43
25,000	2023	5	1,233.25	5,375	22	110
25,000	2024	6	1,660.75	7,000	25	107
25,000	2025	7	2,103.75	8,550	27	171
25,000	2026	8	2,562.50	10,075	29	93
25,000	2027	9	3,037.50	11,525	30	282
25,000	2028	10	3,529.25	12,950	32	9
25,000	2029	11	4,037.50	14,300	33	33
25,000	2030	12	4,562.50	15,625	34	8
25,000	2031	13	5,104.75	16,925	34	304
25,000	2032	14	5,665.00	18,175	35	209
25,000	2033	15	6,244.25	19,375	36	108
25,000	2034	16	6,844.25	20,550	37	21
25,000	2035	17	7,467.25	21,700	37	342
25,000	2036	18	8,113.50	22,825	39	31
25,000	2037	19	8,783.50	23,925	40	356
25,000	2038	20	9,477.25	25,000		
25,000	2039	21	9,782.50	25,000		
25,000	2040	22	10,093.50	25,000		
25,000	2041	23	10,409.25	25,000		
25,000	2042	24	10,729.25	25,000		
25,000	2043	25	11,053.50	25,000		
25,000	2044	26	11,383.50	25,000		
25,000	2045	27	11,719.75	25,000		
25,000	2046	28	12,062.00	25,000		
25,000	2047	29	12,408.50	25,000		
25,000	2048	30	12,757.00	25,000		
25,000	2049	31	13,106.50	25,000		
25,000	2050	32	13,456.50	25,000		
25,000	2051	33	13,807.25	25,000		
25,000	2052	34	14,159.25	25,000		
25,000	2053	35	14,514.00	25,000		
25,000	2054	36	14,871.75	25,000		
25,000	2055	37	15,233.25	25,000		
25,000	2056	38	15,598.00	25,000		
25,000	2057	39	15,965.00	25,000		
25,000	2058	40	16,331.25	25,000		

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SCHEDULE OF INSURANCE AND VALUES

Continued from Page 4

- Insurance Amount - On Insured	Nov 16,	----------Guaranteed Values---------- End of Policy Year	Cash Value Dollars	Paid Up Insurance Dollars	Extended Term Ins Yrs Days
25,000	2059	41	16,694.50	25,000	
25,000	2060	42	17,055.50	25,000	
25,000	2046	Age 60	12,062.00	25,000	
25,000	2048	Age 62	12,757.00	25,000	
25,000	2051	Age 65	13,807.25	25,000	
25,000	2056	Age 70	15,598.00	25,000	

Guaranteed values at the end of any Policy Year presume payment of all specified premiums to the end of such Policy Year. The interest rate for guaranteed values and single premiums is 4.0% a year. The mortality table used is the Commissioners 2001 Standard Ordinary Composite Ultimate Mortality Table.

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DEFINITIONS

We, Us, and **Our** refer to State Farm Life Insurance Company.

You and **Your** refer to the Owner.

Application. Includes any life insurance application, medical history, questionnaire, and other documents from You or any other person proposed for insurance which are made a part of this Policy.

Basic Plan Amount. The amount of insurance on the Insured provided by the Basic Plan shown on pages 1 and 3.

Benefit Period Ends. The coverage for the benefit extends to, but does not include, the Policy Anniversary in the year shown on page 3 under this heading.

Cash Value. Sum of the Cash Values provided by the Basic Plan and any Riders.

Cash Surrender Value. Cash Value plus the Cash Value of any Paid-up Additions plus any Dividend Credits less any Loan and accrued Loan Interest.

Class of Risk. The underwriting class of the person insured.

Code. The U.S. Internal Revenue Code, as amended from time to time.

Dividend Credits. Any Dividend Accumulation or any current dividend under Dividend Option 1 or 3.

Dollars. Any money We pay, or which is paid to Us, must be in United States dollars.

Effective Date. Coverage starts on this date.

Initial Amount. The amount of coverage on the Effective Date of each benefit shown on page 3 under this heading.

Initial Payment. The amount shown on page 3 You must pay before this Policy becomes effective.

Insurance Amount. The amount of life insurance provided by the Basic Plan and any Rider on the Policy Anniversary Dates shown on page 4 under this heading.

Issue Date. The date this Policy is issued shown on page 3.

Officer. The president, a vice president, the secretary, or an assistant secretary of State Farm Life Insurance Company.

Payee. On the Insured's death, the Beneficiaries shown in the Application, unless changed. If You surrender this Policy while the Insured is alive, the persons that You have named to receive the Cash Surrender Value. A Payee can be other than a natural person only if We agree.

Policy Class. The classification of the Basic Plan shown on page 3 used to determine eligibility for Extended Term or Paid-up Insurance if this Policy lapses.

Policy Date. The Effective Date of this Policy shown on pages 1 and 3.

Policy Month, Year, or Anniversary. A policy month, year, or anniversary is measured from the Policy Date.

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DEFINITIONS (CONTINUED)

Premiums Payable. Premiums are payable until the Policy Anniversary shown on page 3 under this heading.

Proceeds. The sum of the insurance amounts payable under
(1) the Basic Plan,
(2) any Paid-up Additions, and
(3) any Rider on the Insured
plus any Dividend Credits, any dividend payable at the Insured's death, and any premium paid for part of the Payment Period beyond the Insured's date of death less any Loan, any accrued Loan Interest, and any part of a premium due.

Request. A written request signed by the person making the Request. Such Request must be received by Us and be on Our request form; or if such Request is not on Our request form, it must include the information required by Our request form.

Rider. Any benefit, other than the Basic Plan, made a part of this Policy.

Successor Owner. May be named in the Application or later by Request.

Total Initial Amount. The amount of life insurance on the Insured provided by the Basic Plan and any Rider on the Policy Date shown on pages 1 and 3.

GENERAL PROVISIONS

The Contract. This Policy contains the Basic Plan, any amendments, any endorsements, any Riders, and a copy of the Application. This Policy is the entire contract. We have relied on the statements in the Application in issuing this Policy. We reserve the right to investigate the truth and completeness of those statements. In the absence of fraud, those statements are representations and not warranties. Only statements in the Application will be used to rescind this Policy or deny a claim within the time period specified in the Incontestability provision.

Only an Officer has the right to change this Policy. No agent has the authority to change this Policy or to waive any of its terms. All endorsements, amendments, and Riders must be signed by an Officer to be valid.

We may modify this Policy after We notify You to assure continued qualification of this Policy as a life insurance contract under any section of, regulation or ruling under, the Code as amended from time to time. If We modify this Policy, We will send You the appropriate endorsement to be placed with this Policy. Such endorsement is subject to regulatory approval. If any provision of this Policy conflicts with the law of a jurisdiction that governs this Policy, the provision is deemed to be amended to conform to such law.

Transaction Delay. Any payment of the Cash Surrender Value or Loan will usually be made within 7 days of receipt of the Request for payment. We may defer payment of any Cash Surrender Value or Loan for up to 6 months from the date We receive Your Request. However, a Loan to pay a premium on other policies with Us will not be deferred.

If We defer any such payment for 30 days or more, We will pay interest in addition to such payment. Such interest accrues from the date the payment becomes payable to the date of payment at 2% per year or the interest rate and time required by law, if greater.

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GENERAL PROVISIONS (CONTINUED)

Cash Surrender. You may surrender this Policy at any time by Request. All coverage ceases on the date We receive the Request or later date if You so indicate in Your Request. We will pay You the Cash Surrender Value as of the date coverage ceases plus any premium paid for the Payment Period beyond that date. We may defer paying You the Cash Surrender Value for up to 6 months after receiving Your Request.

Assignment. You may assign this Policy or any interest in it. We will recognize an assignment only if it is in writing and filed with Us. We are not responsible for the validity or effect of any assignment. An assignment may limit the interest of any Beneficiary. The assignment will take effect the date You sign the notice or the date You choose, subject to any payments made or actions taken by Us prior to receipt of this notice.

Error in Age or Sex. If the Insured's date of birth or sex is not as stated in the Application, We will adjust each benefit on the Insured to that which the most recent premium paid would have bought at the correct age and sex. Such adjustment will be based on the premium rates in effect on the issue date of the benefit.

Incontestability. Except for nonpayment of premiums, We will not contest the Basic Plan after it has been in force during the Insured's lifetime for 2 years from the Policy Date. Except for nonpayment of premiums, We will not contest any reinstatement after it has been in force during the lifetime of the Insured for 2 years from the Effective Date of the reinstatement. Any contest will be based on statements made in the Application that are material to the risk or the hazard assumed by Us.

Each Rider has its own incontestability provision.

Limited Death Benefit. If the Insured dies by suicide while sane or insane within 2 years from the Policy Date, the Basic Plan Amount will not be paid. The Proceeds in this case will be limited to the premiums paid on the Basic Plan less any Loan, accrued Loan Interest, and any dividends paid on the Basic Plan. If the Insured dies by suicide while sane or insane within 2 years from the date this Policy is reinstated, the Basic Plan Amount will not be paid. The Proceeds in this case will be limited to the premiums paid on the Basic Plan since the date of reinstatement less any Loan, accrued Loan Interest, and any dividends paid on the Basic Plan.

Each Rider has its own limited death benefit provision.

Conformity with Interstate Insurance Product Regulation Commission Standards. This Policy was approved under the authority of the Interstate Insurance Product Regulation Commission and issued under the Commission standards. Any provision in this Policy that on the provision effective date is in conflict with Interstate Insurance Product Regulation Commission standards for this type of product is hereby amended to conform to the Interstate Insurance Product Regulation Commission standards for this type of product as of the provision's effective date.

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OWNERSHIP PROVISIONS

Owner. The Owner is as named in the Application, unless changed. You may exercise any policy provision only by Request and while the Insured is alive, subject to the rights of any assignee that We have on record and to the rights of any irrevocably designated Beneficiary. The Successor Owner will become the Owner of this Policy if You die while this Policy is in force.

Change of Owner/Successor Owner. You may change the Owner or Successor Owner by Request while the Insured is alive and this Policy is in force. The change will take effect the date You sign the Request, unless You specify a later date. The change will not affect any action We have taken before We receive the Request. A change of Owner or Successor Owner does not change the Beneficiary Designation.

PREMIUM PROVISIONS

Payment of Premiums. You may pay premiums at Our Home Office or to one of Our agents. We will give You a receipt signed by one of Our Officers, if You request one.

The first premium is due on the Policy Date. All other premiums are payable on or before their Due Dates. A Due Date is the first day of each Payment Period. A Payment Period may be 1 month, 3 months, 6 months, or 12 months, starting on the same date of the month as the Policy Date. If the Payment Period is 1 month, the monthly premium is due at the start of each 1-month Payment Period. If the Payment Period is 3 months, the quarterly premium is due at the start of each 3-month Payment Period. If the Payment Period is 6 months, the semi-annual premium is due at the start of each 6-month Payment Period. If the Payment Period is 12 months, the annual premium is due at the start of each 12-month Payment Period. If the Due Date does not appear in a calendar month's days, the Due Date will be the last day of that same month. You may change the Payment Period on any Due Date by paying the premium for the new period, but You cannot change the Payment Period if premiums are being waived.

Grace Period. Except for the first premium, 31 days are allowed for the payment of a premium after its Due Date. During this time, the policy benefits continue. Any premium payment sent by U.S. mail with a postmark before the end of the Grace Period will be considered paid during the Grace Period.

Nonpayment of Premium. If any premium has not been paid by the end of its Grace Period and that premium cannot be paid either from Dividend Accumulations or by Loan, this Policy will lapse as of the Due Date of any unpaid premium. With such lapse, coverage ceases unless continued as Extended Term or Paid-up Insurance.

Accumulations to Avoid Lapse. This provision will apply if You send Us a Request. If this provision applies, Dividend Accumulations will be used to pay any premium not paid by the end of its Grace Period. Any unpaid balance of that premium will be due the day after the end of the partial Payment Period. A new Grace Period will be allowed for the payment of this unpaid balance. We will send You a notice if any Dividend Accumulation is used to pay part of any premium.

You may cancel this provision at any time. If You cancel this provision within 90 days after the premium Due Date, any Dividend Accumulations will be recredited. Your choice will take effect as of the premium Due Date.

Automatic Premium Loan. This provision will apply if You chose it on the Application or later by Request. This provision will apply if there is enough Loan Value less any existing Loan and accrued Loan Interest to pay the unpaid premium for the current Payment Period and there are no available Dividend Accumulations. Any premium or part of any premium that is not paid by the end of its Grace Period will be paid by Loan. Loan Interest will be charged from the Due Date of the unpaid premium. You may cancel this provision at any time by Request. We must receive Your Request to elect or cancel this provision before this Policy lapses.

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PREMIUM PROVISIONS (CONTINUED)

Reinstatement. If You have not surrendered this Policy for cash, You may apply to reinstate it within 5 years after lapse. You must give Us proof of the Insured's insurability that is satisfactory to Us. You must pay all unpaid premiums with interest from their Due Dates. The interest rate is 6% a year. You must repay or restore any Loan at the time of lapse with compound interest, based on the Loan Interest Rates in effect during the period of lapse, to the date of reinstatement. The amount restored cannot be greater than the Loan Value on the date of reinstatement. Reinstatement will take effect on the date We approve the Insured's insurability.

Premium Adjustment When the Insured Dies. If the Insured dies during a Grace Period, any part of a premium due will be paid from the Proceeds. Any premium paid for the Payment Period beyond the Insured's death will be part of the Proceeds.

DIVIDEND PROVISIONS

Annual Dividends. We may apportion and pay dividends each year. Any such dividends will be paid only at the end of a Policy Year. There is no right to a partial or prorated dividend prior to the end of a Policy Year. Such dividends will not be paid if all premiums due have not been paid or if the Basic Plan is in force as Extended Term Insurance.

Dividend Options. You may choose to have Your dividend used under one of these options:

1. Premium Payment. We will apply it toward payment of a premium then due.

2. Paid-up Additions. We will use it to buy a paid-up life insurance addition to the Basic Plan. Each addition is bought at the single premium rate for the Insured's sex and attained age at that time. We may also pay an annual dividend on these Paid-up Additions. You may surrender Paid-up Additions for their Cash Value at any time. The Cash Value of Paid-up Additions is based on the single premium rate for the Insured's sex and attained age on the date surrendered. If surrendered prior to the end of the Policy Year, there is no right to a partial or prorated dividend. Paid-up Additions in force at the Insured's death will be part of the Proceeds.

3. Dividend Accumulation. We will hold it at interest. We will credit interest at a rate not less than the interest rate shown on page 3. Such interest will be paid only at the end of the Policy Year. You may withdraw all or part of the Dividend Accumulation at any time. If withdrawn prior to the end of the Policy Year, there is no right to a partial or prorated credit of such interest. The Dividend Accumulation plus interest to the Insured's death will be part of the Proceeds.

4. Cash. We will pay it to You in cash.

If You do not choose a Dividend Option on the Application or the Dividend Option chosen is not available, We will use Dividend Option 2. You may change the Dividend Option by Request. The change will apply only to dividends paid after We receive Your Request.

Dividend When the Insured Dies. We may pay a dividend when the Insured dies. Such dividend will be a partial or prorated amount based on the period from the start of a Policy Year to the Insured's death.

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GUARANTEED VALUES PROVISIONS

Guaranteed Values. The Guaranteed Values shown on page 4 are based on Your payment of all premiums when they are due. These values are as of the end of the Policy Years shown. They do not include the Cash Value of any Paid-up Additions and will be adjusted for any Dividend Credits or Loan on this Policy. If requested, We will furnish You with any values not shown.

Cash Value. The Cash Value is the sum of the Cash Value of the Basic Plan and any Riders. Any Cash Values on the Basic Plan not shown on page 4 will be calculated as specified in the Basis of Computation provision. The Cash Value will be based on the date to which premiums have been paid. If any amount of premium is due and not paid, the Cash Value for the 90 days after that Due Date is the same as on such Due Date. The Cash Value on any date between Policy Anniversaries is determined by interpolating between the Cash Value on the Policy Anniversary immediately before and after that date for the time period from the previous Policy Anniversary to that date plus any premium paid for the Payment Period beyond that date.

If the Basic Plan has been in force for more than 90 days as Extended Term or Paid-up Insurance, the Cash Value is the single premium for the insurance remaining. The Cash Value of such insurance will not decrease during the 31 days after a Policy Anniversary.

Extended Term and Paid-up Insurance. If this Policy lapses and there is a Cash Surrender Value, We will continue the Basic Plan as Extended Term or Paid-up Insurance. Extended Term Insurance is available only if this Policy is in Policy Class 1 or 2. Extended Term Insurance will be used at the time of lapse unless You choose to continue this Policy as Paid-up Insurance or surrender this Policy. If this Policy is in Policy Class 3, Paid-up Insurance will be used at the time of lapse unless You surrender this Policy.

You may choose by Request to have the Basic Plan continued as Paid-up Insurance or, if this Policy is not in Policy Class 3, as Extended Term Insurance. To be effective on the Due Date of any unpaid premium, Your Request must be received by Us within 90 days after that date.

The amount of Extended Term Insurance will be the Basic Plan Amount plus the amount of any Paid-up Additions plus any Dividend Credits less any Loan and accrued Loan Interest. The amount will stay level. The extended term period will be determined by applying the Cash Surrender Value as a single premium at the Insured's sex and attained age on the Due Date of any unpaid premium. If there is more value than needed to provide Extended Term Insurance for life, We will promptly pay You the excess in one sum. Extended Term Insurance has no Loan Value and will receive no dividends.

The amount of Paid-up Insurance will be determined by applying the Cash Value plus the Cash Value of any Paid-up Additions less any Loan and accrued Loan Interest as a single premium at the Insured's sex and attained age on the Due Date of any unpaid premium. The amount will stay level. Paid-up Insurance has Loan Value and may be eligible for dividends. Any Dividend Accumulation at the time this Policy is continued as Paid-up Insurance will not be affected.

Basis of Computation. The Guaranteed Values in this Policy are at least as large as the minimum values and benefits required by the NAIC Standard Nonforfeiture Law for Life Insurance, model #808. A statement of how these values are determined has been filed with The Interstate Insurance Product Regulation Commission.

The Guaranteed Values and single premiums are based on the Insured's age last birthday and sex. It is assumed that premiums are paid continuously and claims are paid immediately. The interest rate is shown on page 4. For Guaranteed Values and single premiums, the mortality tables that We use are shown on page 4. The Cash Values for the Basic Plan for Policy Anniversaries not shown on page 4 are equal to the reserves which are calculated using the Commissioners Reserve Valuation Method.

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POLICY LOAN PROVISIONS

Loan. You may borrow against this Policy by Request at any time, unless the Basic Plan is in force as Extended Term Insurance. This Policy is the sole security for such Loan. We may defer a Loan for up to 6 months after receiving Your Request unless the Loan will be used to pay premiums on this or other policies with Us.

You may borrow the Loan Value less any existing Loan, accrued Loan Interest, and unpaid premiums. If Your unpaid Loan plus accrued Loan Interest exceeds the Cash Value of this Policy plus the Cash Value of any Paid-up Additions, We will send You a policy termination notice. This Policy will terminate 31 days after We have mailed that notice to You and to any assignee of record. If this occurs and is the result of a change in the Loan Interest Rate, this Policy will terminate at the later of the end of the Policy Year or 31 days after mailing of the notice. At policy termination, We will then pay You any Dividend Accumulation.

Loan Value. The Loan Value is the Cash Value of this Policy and the Cash Value of any Paid-up Additions on the next Policy Anniversary less any unpaid premiums for the current Policy Year discounted at the Loan Interest Rate from that Policy Anniversary to the date of the Loan. If premiums are no longer payable, the Loan Value will be the Cash Value of this Policy and the Cash Value of any Paid-up Additions on the next Policy Anniversary discounted at the Loan Interest Rate from that Policy Anniversary to the date of the Loan.

Loan Interest Rate. The Loan Interest Rate is an adjustable rate. We determine the rate each calendar quarter. Such rate will take effect the first day of January, April, July, and October after the date We determine it. Such rate will apply to any new and existing Loan under this Policy.

Any change in the rate will be subject to the following:

(1) The rate will be lowered to be equal to or less than the legal maximum rate if such legal maximum is 0.5% or more a year lower than Our rate then in effect.
(2) The rate may be increased by at least 0.5% a year if the legal maximum is 0.5% or more a year higher than Our rate then in effect. Such rate cannot exceed the legal maximum.

The legal maximum interest rate is the greater of:

(1) the Moody's Corporate Bond Yield Average - Monthly Average Corporates as published by Moody's Investors Service, Inc. for the calendar month ending 2 months prior to the date the Loan Interest Rate is to go into effect, or
(2) the interest rate used to calculate Cash Values under this Policy during the period for which the Loan Interest Rate is being determined plus 1% a year.

If the Moody's Corporate Bond Yield Average - Monthly Average Corporates is no longer published, the rate used in its place will be set by law or regulation of the insurance supervisory official in the jurisdiction where this Policy was delivered.

We will:

(1) notify You of the initial Loan Interest Rate at the time a Loan is made, unless it is an Automatic Premium Loan;
(2) notify You of the initial Loan Interest Rate as soon as practical after an Automatic Premium Loan is made; and
(3) give You advance notice of any increase in the Loan Interest Rate, if You have a Loan at that time.

We charge interest each day on any Loan. Loan Interest is due at the end of each Policy Year or at the time the Loan is repaid, if earlier. Loan Interest is added to the Loan if not paid when due.

Loan Repayment. You may repay all or part of a Loan at any time before the Insured dies or this Policy is surrendered. Any Loan that We deducted when the Basic Plan was placed on Extended Term or Paid-up Insurance may be repaid or restored only if the Basic Plan is reinstated.

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PAYMENT OF BENEFITS PROVISIONS

Beneficiary Designation. This is as shown in the Application, unless You have made a change by Request. It includes the name of the Beneficiary. If You name "estate" as a Beneficiary, it means the executors or administrators of the last survivor of You and all Beneficiaries. If You name "children" of a person as a Beneficiary, only children born to or legally adopted by that person will be included. We may rely on an affidavit as to the ages, names, and other facts about all Beneficiaries. We will incur no liability if We act on such affidavit.

Change of Beneficiary Designation. You may make a change by Request while the Insured is alive and this Policy is in force. The change will take effect on the date Your Request is signed, unless You specify a later date. The change will not affect any action We have taken before We receive the Request. To change a named irrevocable Beneficiary, the Request must include a written consent from the irrevocable Beneficiary who is being changed.

Order of Payment on the Insured's Death. When the Insured dies, We will make payment in equal shares to the primary Beneficiaries living when payment is made. If the last primary dies, We will make payment in equal shares to the successor Beneficiaries living when payment is made. If, at any time, no Beneficiary is living, We will make a one sum payment to You, if living when payment is made. Otherwise, We will make a one sum payment to the estate of the last survivor of You and all Beneficiaries. You may change this order of payment by Request while the Insured is alive.

Methods of Payment. We will pay the Proceeds or the Cash Surrender Value under the One Sum Method unless You choose another method then available. If the Payee is other than a natural person, We will make payment under the One Sum Method.

All payment intervals are measured from the date this Policy is surrendered or from the date the Insured dies.

After the Insured's death, a Payee who has the right to make a withdrawal may change the method of payment. This Payee may also appoint a successor payee. The successor payee may be the Payee's estate.

We must receive a Request for payment of the Proceeds and due proof of the Insured's death. Due proof of the Insured's death is evidence satisfactory to Us:

(1) to establish the date and fact of the Insured's death;
(2) to permit Us to determine whether Proceeds are payable; and
(3) such other items and information as may be necessary for Us to comply with laws and regulations related to payment of the claim or administration of the business of insurance.

Method 1 (One Sum Method). We will pay the Cash Surrender Value or the Proceeds in one sum. Interest will be paid from the date of the Insured's death to the date of payment. The interest rate will be the greater of 2% a year or the interest rate applicable to Proceeds left on deposit with Us.

Method 2 (Other Method). Payment by any other method may be made if We agree.

Interest on Delayed Payment of Proceeds. Additional interest at the rate of 10% a year will be credited to Proceeds if the payment of Proceeds is delayed more than 31 calendar days after the latest of the following dates:

(1) the date We receive due proof of the Insured's death;
(2) the date We receive sufficient information to determine Our liability, the extent of the liability, and the appropriate Beneficiary legally entitled to the Proceeds; and
(3) the date legal impediments to payment of the Proceeds that depend on the action of parties other than Us are resolved and sufficient evidence of the same is provided to Us. Legal impediments to payment include, but are not limited to, (a) the establishment of guardianships and conservatorships; (b) the appointment and qualification of trustees, executors and administrators; and (c) the submission of information required to satisfy state and federal reporting requirements.

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WAIVER OF PREMIUM BENEFIT RIDER

General. This Rider is part of this Policy. It is based on the Application for this Rider and the payment of premiums. The premiums for this Rider are shown on page 3. Only certain policy provisions are a part of this Rider. They are "Definitions," "Ownership," "Premium," "The Contract," "Assignment," and "Error in Age or Sex." The provisions of this Rider apply in lieu of any other Policy provisions to the contrary. This Rider does not have Cash Value or Loan Value.

Waiver of Premium Benefit. We will waive each premium due as defined below if the Insured becomes totally disabled while this Rider is in force and such Total Disability has existed for 6 continuous months during the lifetime of the Insured as follows:

(1) If the Insured becomes totally disabled prior to the Policy Anniversary when the Insured is age 60, We will waive each premium due until the Policy Anniversary when the Insured is age 65 as long as the Total Disability continues. If the Insured is totally disabled as defined below on the Policy Anniversary when the Insured is age 65, We will waive all future premiums due.

(2) If the Insured becomes totally disabled on or after the Policy Anniversary when the Insured is age 60 and prior to the Policy Anniversary when the Insured is age 62, We will waive each premium due until the Policy Anniversary when the Insured is age 65 as long as the Total Disability continues. We will not waive any premium due on or after the Policy Anniversary when the Insured is age 65.

(3) If the Insured becomes totally disabled on or after the Policy Anniversary when the Insured is age 62 and prior to the Policy Anniversary when the Insured is age 65, We will waive each premium due until the third Policy Anniversary after Total Disability starts as long as the Total Disability continues. We will not waive any premium due on or after the third Policy Anniversary after Total Disability starts.

We will only waive premiums due on and after Total Disability starts. No premium will be waived which was due more than one year prior to the date We receive notice of claim. While premiums are waived, all benefits continue as though You had paid the premiums.

A recurrence of a Total Disability for which We had been waiving premiums will be deemed a continuation of the prior period of Total Disability if the recurrence:

(1) results from the same injury or disease that caused the previous Total Disability;
(2) starts within 6 months of the date the previous Total Disability ended; and
(3) starts while this Rider is still in force.

Such recurrent Total Disability will not be subject to a new requirement that the Total Disability must first exist for 6 continuous months during the Insured's lifetime.

Total Disability Defined. Total Disability is a condition caused by injury or disease. During the first 24 months after Total Disability starts, this condition must prevent the Insured from performing substantially all of the work of the Insured's regular occupation. After the first 24 months after Total Disability starts, the condition must prevent the Insured from performing substantially all of the work in any occupation for which the Insured is, or becomes, reasonably qualified based upon education, training, or experience. The Insured's total and irrecoverable loss, caused by injury or disease, of any of the following will be considered Total Disability even if the Insured is able to work:

(1) sight in both eyes.
(2) use of both hands.
(3) use of both feet.
(4) use of one hand and one foot.

Disabilities Not Covered. We will not waive premiums if Total Disability:

(1) starts before the Effective Date of this Rider unless such disability was disclosed in the Application,
(2) starts before the Policy Anniversary when the Insured is age 5,
(3) results from an intended self-injury, or
(4) results from any act due to war whether or not the Insured is in the military service. "War" means declared or undeclared war or conflict involving the armed forces of one or more countries, governments, or international organizations.

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WAIVER OF PREMIUM BENEFIT RIDER (CONTINUED)

Notice and Proof of Total Disability. We must receive notice of a claim and due proof of Total Disability while the Insured is alive and totally disabled. If this is not done, You should submit such notice and proof as soon as reasonably possible. We may also require You to submit proof of the Insured's continuing Total Disability at reasonable intervals, but no more frequently than once every 30 days during the first 24 months after Total Disability starts. If You do not submit proof when We require it, no further premiums will be waived. Failure to give such proof will not invalidate or diminish any claim if it can be shown that proof was given as soon as was reasonably possible. We will not require proof more than once a year after the Total Disability has lasted more than 2 years. We will not require proof after the Policy Anniversary when the Insured is age 65.

Premium Payments. If the Insured's Total Disability starts during a Grace Period, the unpaid premium must be paid before a claim will be approved. We may charge interest on that premium from the end of the Grace Period to the date paid at 6% a year. You must pay all premiums that come due until We approve the claim. We will refund any premium that You paid after Total Disability starts which is later waived. If the Insured dies before such refund is made, We will include that amount in the Proceeds.

Termination. This Rider will terminate on the Policy Anniversary shown on page 3 under Benefit Period Ends. We will terminate this Rider before that date when:

(1) this Policy is terminated by surrender or lapse or
(2) the Basic Plan is continued as Extended Term or Paid-up Insurance.

You may terminate this Rider by Request. This Rider will terminate on the date We receive Your Request. We will revise page 3 of this Policy to show this change. Any premium paid for the payment period beyond the date this Rider terminates will be paid to You.

Termination will not affect any claim for Total Disability which starts before termination.

Incontestability. Except for nonpayment of premiums, We will not contest this Rider after it has been in force during the lifetime of the Insured for 2 years from the Effective Date of this Rider unless the Insured becomes totally disabled within that period. We will not contest any reinstatement of this Rider after it has been in force during the lifetime of the Insured for 2 years from the Effective Date of any reinstatement unless the Insured becomes totally disabled within that period. Any contest will be based on material statements contained in the Application.

Effective Date of this Rider. This is the date coverage starts. It is the same as the Policy Date of this Policy unless a different date for this Rider is shown on page 3.

State Farm Life Insurance Company

Michael J. Tipsord
President

Lynne M. Yowell
Secretary

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Application
Individual Life Insurance

State Farm

State Farm Life Insurance Company
1 State Farm Plaza, Bloomington, IL 61710-0001

1 Select Application Type

- (•) New policy
- ( ) Change to an existing policy/added benefits
- ( ) Term conversion with increase in amount
- ( ) Universal Life increase
- ( ) Select Term re-entry

Indicate the existing policy number(s)

2 Personal Information - Proposed Insured 1

KING (Last name) JOHN (First name) (Middle name)

[redacted]

Sex: (•) Male ( ) Female

Marital status: Married Citizenship: (•) United States ( ) Mexico ( ) Canada ( ) Other

32 (Age) [redacted] (DD/YYYY)

LA (State of birth) 6 / 0 (Height (feet/inches)) 222 (Weight (lbs)) [redacted] (e number) LA (State)

[redacted] Laborer (Occupation) SASOL (Employer)

Annual household income: ( ) 0 - $25,000 ( ) $25,001 - $50,000 ( ) $50,001 - $100,000 ( ) $100,001 or more

Do you work in one of the following occupations: amusement, construction, diving, explosives, gas/oil, liquor, logging, mining, sports? ( ) Yes (•) No *If yes, please describe your exact duties:*

3 Personal Information - Proposed Insured 2/Additional Insured/Payor

Last name First name Middle name

Address

City State ZIP Code

Doc type 01.01

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Marital status: _____ If married, is Proposed Insured 2 married to Proposed Insured 1? ○ Yes ○ No (not applicable if Payor)

Citizenship: ○ United States ○ Mexico ○ Canada ○ Other Sex: ○ Male ○ Female Age _____ Date of birth (MM/DD/YYYY) _____

State of birth _____ Height (feet/inches) _____/_____ Weight (lbs) _____ Driver's license number _____ State _____

SSN/ITIN _____ Occupation _____ Employer _____

Do you work in one of the following occupations: amusement, construction, diving, explosives, gas/oil, liquor, logging, mining, sports? ○ Yes ○ No *If yes, please describe your exact duties:*

4 Add Applicant/Owner Information

Complete this section if the Owner is not the Proposed Insured 1 named in Section 2.

Applicant/Owner

Last name _____ First name _____ Middle name _____

Address _____

City _____ State _____ ZIP Code _____

SSN/ITIN/TIN _____ Date of birth (MM/DD/YYYY) _____ Relationship to Proposed Insured 1 _____

Successor Owner

Complete this section unless Applicant/Owner is a trust or corporation. A Successor Owner is recommended for juvenile applications.

Last name _____ First name _____ Middle initial _____

SSN/ITIN/TIN _____ Date of birth (MM/DD/YYYY) _____

5 Proposed Insured Under Age 16

a. Do you want Proposed Insured 1 to become Owner of policy at, and after, age 21? ○ Yes ○ No

b. Please indicate total amount of life insurance on: Parent/Guardian 1 $ _____ ☐ Select if none

Parent/Guardian 2 $ _____ ☐ Select if none

6 Select Coverages and Policy Provisions

Complete appropriate section based on product selection.

◉ Term Life and Whole Life

○ Universal Life/Joint Universal Life/Survivorship Universal Life

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a. Term Life and Whole Life

i. Policy and Amount

Basic Policy Type:

○ Select Term-10	○ Return of Premium Term-30	○ 10 Pay Whole Life
○ Select Term-20	○ Mortgage Life (Decreasing Term)-15	○ 15 Pay Whole Life
○ Select Term-30	○ Mortgage Life (Decreasing Term)-30	◉ 20 Pay Whole Life
○ Return of Premium Term-20	○ Whole Life	○ Single Premium Whole Life

$ 25,000
Amount applied for

ii. Riders/Benefits

Waiver of Premium (Proposed Insured 1 only): ◉ Yes ○ No

☐ Guaranteed Insurability Option: $ _____

☐ Children's Term Rider: _____ units
CTR unit = $1,000, minimum is 5 units, maximum is 20 units

☐ Payor (Please complete information for Proposed Insured 2)

	Proposed Insured 1	Proposed Insured 2
☐ Select Term-10	$ _____	$ _____
☐ Select Term-20	$ _____	$ _____
☐ Select Term-30	$ _____	$ _____
☐ Mortgage Life (Decreasing Term)-15	$ _____	$ _____
☐ Mortgage Life (Decreasing Term)-30	$ _____	$ _____

iii. Premium Amount and Mode of Premium Payment

Amount of premium submitted with application: $ 50.81

Mode of premium payment: Special Monthly

iv. Dividend Options

Dividends are not guaranteed. *Please select a dividend option from the list provided. If the selected option is unavailable, the policy provisions will determine the option.*

○ Accumulation ○ Cash ◉ Paid-up Additions (not available on Term Life) ○ Reduce Premium

v. Automatic Premium Loan (APL)

Automatic Premium Loan (APL) is a policy provision, available for some policy types, that a policyowner may elect. If any premium remains unpaid at the end of the Policy's grace period, a loan against the cash value is automatically made to pay the unpaid premium. Do you want the APL provision to apply, if available? ◉ Yes ○ No

7 Designate Your Beneficiaries

If additional beneficiary fields are needed, please include in Explanations, Section 17.

a. Proposed Insured 1

Primary Beneficiary(ies)

If there will be multiple primary beneficiaries, allocate equally to all primary beneficiaries: ○ Yes ◉ No

(If "Yes" is selected, do not enter any beneficiary allocation below. If "No" enter the desired allocations below.)

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☒ **Individual**

Name (First name, Middle initial, Last name)	Address, City, State of residence, ZIP Code *(optional)*	Relationship to insured*	Date of birth *(MM/DD/YYYY) (optional)*	Beneficiary Allocation %
COLSTON-KING, CHARMAINE	[redacted]	Spouse	[redacted]	100

** If relationship is Friend, Relative or Other, please provide this person's insurable interest in Explanations, Section 17.*

☐ **Organization** *(enter Beneficiary Allocation):* _____ %

Name of organization: _____

Address, City, State, ZIP Code *(optional):* _____

Preferred phone number *(optional):* _____

☐ **Estate** *(enter Beneficiary Allocation):* _____ %

☐ **Beneficiary Class/Trust** *(enter Beneficiary Allocation):* _____ %

Secondary Beneficiary(ies)

If there will be multiple secondary beneficiaries, allocate equally to all secondary beneficiaries: ○ Yes ○ No

(If "Yes" is selected, do not enter any beneficiary allocation below. If "No" enter the desired allocations below.)

☒ **Individual**

Name (First name, Middle initial, Last name)	Address, City, State of residence, ZIP Code *(optional)*	Relationship to Insured	Date of birth *(MM/DD/YYYY) (optional)*	Beneficiary Allocation %
COLSTON, DWADE	[redacted]	Brother/Sister	[redacted]	100

☐ **Organization** *(enter Beneficiary Allocation):* _____ %

Name of organization: _____

Address, City, State, ZIP Code *(optional):* _____

Preferred phone number *(optional):* _____

☐ **Estate** *(enter Beneficiary Allocation):* _____ %

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☐ **Beneficiary Class/Trust** *(enter Beneficiary Allocation):*_____ %

b. Proposed Insured 2

Primary Beneficiary(ies)

If there will be multiple primary beneficiaries, allocate equally to all primary beneficiaries: ○ Yes ○ No

(If "Yes" is selected, do not enter any beneficiary allocation below. If "No" enter the desired allocations below.)

☐ **Individual**

Name (First name, Middle Initial, Last name)	Address, City, State of residence, ZIP Code *(optional)*	Relationship to Insured*	Date of birth *(MM/DD/YYYY) (optional)*	Beneficiary Allocation %

** If relationship is Friend, Relative or Other, please provide this person's insurable interest in Explanations, Section 17.*

☐ **Organization** *(enter Beneficiary Allocation):*_____ %

Name of organization: _____

Address, City, State, ZIP Code *(optional):* _____

Preferred phone number *(optional):* _____

☐ **Estate** *(enter Beneficiary Allocation):*_____ %

☐ **Beneficiary Class/Trust** *(enter Beneficiary Allocation):*_____ %

Secondary Beneficiary(ies)

If there will be multiple secondary beneficiaries, allocate equally to all secondary beneficiaries: ○ Yes ○ No

(If "Yes" is selected, do not enter any beneficiary allocation below. If "No" enter the desired allocations below.)

☐ **Individual**

Name (First name, Middle Initial, Last name)	Address, City, State of residence, ZIP Code *(optional)*	Relationship to Insured	Date of birth *(MM/DD/YYYY) (optional)*	Beneficiary Allocation %

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☐ **Organization** *(enter Beneficiary Allocation):*_____ %

Name of organization: _____

Address, City, State, ZIP Code *(optional):* _____

Preferred phone number *(optional):* _____

☐ **Estate** *(enter Beneficiary Allocation):*_____ %

☐ **Beneficiary Class/Trust** *(enter Beneficiary Allocation):*_____ %

8 Children's Term Rider

Coverage does not begin until a child is 15 days old.

Do you have any children (including stepchildren or legally adopted children) under 18 years old? ○ Yes ○ No

List children under age 18, if any. For relationship to Proposed Insured (PI), please indicate Child, Stepchild or Legally Adopted Child.

Name (First name, Middle initial, Last name)	Sex	Relationship to PI 1	Relationship to PI 2 (Joint Universal Life only)	Date of birth (MM/DD/YYYY)	Amount of life insurance on child*
	○ Male ○ Female				$
	○ Male ○ Female				$
	○ Male ○ Female				$
	○ Male ○ Female				$

**Excludes the amount being applied for and group insurance.*

If additional space is needed for children's names, please include in Explanations, Section 17.

9 Children's Term Rider/Juvenile Medical Information

a. In the last **10 years**, has Proposed Insured 1, or any children named in Children's Term Rider Section 8, been diagnosed, treated or given advice by a member of the medical profession for any of the following? *(select all that apply):*

☐ Anemia ☐ Cancer ☐ Impairment of sight, hearing or speech ☐ Leukemia
☐ Asthma ☐ Diabetes ☐ Mental Disorder
☐ Birth Defect ☐ Heart Murmur ☐ Kidney Disease ☐ Seizure

☐ **None of the above**

If any are selected, please provide a detailed explanation in the space provided in Explanations, Section 17.

b. Has Proposed Insured 1, or any children named in Children's Term Rider Section 8, ever tested positive for or been diagnosed by a member of the medical profession with:

- Human Immunodeficiency Virus (HIV) ○ Yes ○ No
- Acquired Immune Deficiency Syndrome (AIDS) ○ Yes ○ No

If any are selected "yes," please provide a detailed explanation in the space provided in Explanations, Section 17.

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c. In the last **three (3) years**, has Proposed Insured 1, or any children named in Children's Term Rider Section 8, seen a member of the medical profession for any reason not previously explained (excluding routine physical examinations with normal findings)? ○ Yes ○ No

If yes, please provide a detailed explanation in the space provided in Explanations, Section 17.

10 Other - Life Insurance or Annuities

In Force Coverage

These questions should be completed by Proposed Insured(s).

a. What is the total amount of life insurance in force from all companies (excluding group insurance)?

Proposed Insured 1 $ 0 - 250,000 Proposed Insured 2 $ _____

Replacement of Life Insurance or Annuities

If Proposed Insured 1 will not be the Owner, these questions should be completed by Applicant.

b. Do you own any life insurance or annuities on yourself or others? ○ Yes ◉ No

- If yes, is the policy being applied for a replacement of any of those policies:
  - Are you considering discontinuing making premium payments, surrendering, forfeiting, assigning to the insurer, or otherwise terminating your existing policy or contract? ○ Yes ○ No
  - Are you considering using funds from your existing policies or contracts to pay premiums due on the new policy or contract? ○ Yes ○ No

Other Transactions

All states except OH: These questions should be completed by Applicant when Proposed Insured(s) is age 50 or over, and face amount of policy is $500,000 or greater.

OH: These questions should be completed by Applicant when the Proposed Insured is age 16 or over. If you answer "yes" to any of these questions, please provide a detailed explanation in the space provided in Explanations, Section 17.

c. Have you entered into, or are you considering plans to enter into, any agreement to sell, transfer, or assign any ownership or rights to this policy or its benefits? ○ Yes ○ No

d. Have you received or do you anticipate receiving any type of inducement, fee, or compensation as an incentive to purchase the policy you are applying for? ○ Yes ○ No

Sections 11 through 15 are required for all applications when Proposed Insured is age 16 and up. Provide a detailed explanation for all "Yes" answers in Explanations, Section 17.

11 Additional Insurance Information

	Proposed Insured 1	Proposed Insured 2
a. Have you ever had an application for life insurance declined or postponed?	○ Yes ◉ No	○ Yes ○ No
b. In the last **three (3) years**, have you claimed or received any disability benefits because of injury or sickness?	○ Yes ◉ No	○ Yes ○ No

12 Medical Information

	Proposed Insured 1	Proposed Insured 2
a. Have you ever tested positive for or been diagnosed by a member of the medical profession with:		
• Human Immunodeficiency Virus (HIV)	○ Yes ◉ No	○ Yes ○ No
• Acquired Immune Deficiency Syndrome (AIDS)	○ Yes ◉ No	○ Yes ○ No

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	Proposed Insured 1	Proposed Insured 2
b. In the last **three (3) years**, have you been treated, diagnosed, or advised by a member of the medical profession as follows? *(If yes, select all that apply.)*	○ Yes ◉ No	○ Yes ○ No
• Hospitalized or surgically treated for chest pain or any disorder of the heart?	☐	☐
• Hospitalized or surgically treated for stroke or mini-stroke (transient ischemic attack/TIA)?	☐	☐
• Diagnosed with, or are you currently being treated for, cancer (excluding basal cell and squamous cell cancer of the skin)?	☐	☐
• Diagnosed with any kidney disorder that requires current dialysis treatment?	☐	☐
• Advised to have further evaluation or testing (except for HIV) to determine a diagnosis; or had surgery recommended that has not been performed?	☐	☐

13 Criminal Charges and Convictions

	Proposed Insured 1	Proposed Insured 2
a. In the last **three (3) years**, have you been involved in any of the following? *(If yes, select all that apply.)*	○ Yes ◉ No	○ Yes ○ No
• Convicted of or pleaded guilty to any felony?	☐	☐
• Charged with a crime (with charges pending at this time)?	☐	☐
• Placed on parole or probation?	☐	☐
• Incarcerated or facing incarceration as the result of a guilty plea or conviction?	☐	☐
b. In the last **three (3) years**, have you been convicted of or pleaded guilty to driving under the influence of alcohol or drugs?	○ Yes ◉ No	○ Yes ○ No

14 Lifestyle and Travel Information

	Proposed Insured 1	Proposed Insured 2
Travel Information		
a. Are you **currently** residing or traveling in any country outside of the United States or Canada?	○ Yes ◉ No	○ Yes ○ No
b. In the next **six (6) months**, do you plan to leave or travel from the United States or Canada?	○ Yes ◉ No	○ Yes ○ No
Lifestyle Information	Proposed Insured 1	Proposed Insured 2
c. In the last **three (3) years**, have you engaged in any of the following? *(If yes, select all that apply.)*	○ Yes ◉ No	○ Yes ○ No
• Aviation (other than as a passenger or commercial airline crew)	☐	☐
• Sky diving (more than 1 time), BASE jumping, hang gliding	☐	☐
• Mountain/rock climbing	☐	☐
• SCUBA diving (depths greater than 100 feet)	☐	☐
• Vehicle racing	☐	☐

15 Tobacco Use

	Proposed Insured 1	Proposed Insured 2
a. In the last **three (3) years**, have you used tobacco or other nicotine products in any form?	○ Yes ◉ No	○ Yes ○ No
If yes, please provide month/year last used:	____ / ____ MM YYYY	____ / ____ MM YYYY

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16 Additional Medical Information (If no medical exam is required)

This section is required for all:

- *New business applications when Proposed Insured is age 16 and up and no medical exam is required.*
- *Change of plan applications when the Proposed Insured is age 16 and up.*

Provide a detailed explanation for all "Yes" answers in Explanations, Section 17.

	Proposed Insured 1	Proposed Insured 2
a. In the last **10 years**, have you been diagnosed, treated, or been given advice by a member of the medical profession for any of the conditions listed below? *(If yes, select all that apply.)*	○ Yes ◉ No	○ Yes ○ No
• Attention Deficit Disorder (ADD)/Attention Deficit Hyperactivity Disorder (ADHD)	☐	☐
• Asthma	☐	☐
• Blood Disorder	☐	☐
• Cancer/Tumor	☐	☐
• Chronic Obstructive Pulmonary Disease (COPD)/Emphysema	☐	☐
• Diabetes	☐	☐
• Heart Disease or Disorder	☐	☐
• High Blood Pressure	☐	☐
• Intestinal Disorder	☐	☐
• Liver Disorder	☐	☐
• Mental/Nervous Disorder	☐	☐
• Organ Transplant (other than cornea transplant)	☐	☐
• Sleep Apnea	☐	☐
b. In the last **five (5) years**, have you for any reason not previously explained:		
• Seen a doctor or any member of the medical profession, or been treated at a hospital or other medical facility (*excluding seasonal illnesses such as colds, flu, bronchitis and allergies such as hay fever*)?	○ Yes ◉ No	○ Yes ○ No
• Had medication prescribed other than medications for cold, flu, seasonal allergies or birth control?	○ Yes ◉ No	○ Yes ○ No
c. In the last **10 years**, have you:		
• Used cocaine, marijuana, methamphetamine, or any other controlled substance or narcotic not prescribed by a member of the medical profession?	○ Yes ◉ No	○ Yes ○ No
• Had medical treatment or counseling for use of alcohol or prescribed or non-prescribed drugs?	○ Yes ◉ No	○ Yes ○ No
• Been advised by a member of the medical profession to discontinue use of alcohol or prescribed or non-prescribed drugs?	○ Yes ◉ No	○ Yes ○ No

17 Explanations

If you need more space, please attach additional pages, which will become part of this application. Please note that these must be signed and dated by the Proposed Insured(s) and/or Applicant, and witnessed by Agent.

I have agreed to complete the life insurance application and supporting forms using electronic documents.
JOHN KING has agreed to receive documents and communications electronically.
JOHN KING Primary Beneficiary Name: COLSTON-KING, CHARMAINE
; Preferred Phone Number: 3374996021; Per Stirpes:No
JOHN KING Secondary Beneficiary Name: COLSTON, DWADE
; Preferred Phone Number: 3377945154; Per Stirpes:No

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

StateFarm®

18 Agreements

Coverage will be effective as of the Policy Date if the following conditions are met: the first premium is paid when this policy is delivered; the Proposed Insureds are living on the delivery date; and, on that delivery date, the information given to the Company is true and complete to the best of the Proposed Insureds' and Applicant's knowledge and belief.

For changes in Basic Amount for a Universal Life Policy or Joint Universal Life, the change will be effective on the Deduction Date on or next following acceptance of the change by the Company if on such Deduction Date the following conditions are met: there is enough Cash Surrender Value to make the required monthly deduction; the Proposed Insureds are all living; and the information given to the Company is true and complete to the best of the Proposed Insureds' and Applicant's knowledge and belief.

However, if a Binding Receipt has been given and is in effect, its terms apply.

All Proposed Insureds and the Applicant state that the information in this Application and any medical history is true and complete to the best of their knowledge and belief. Information is not true and complete to the best of their knowledge and belief if it misrepresents or omits a fact which a Proposed Insured or the Applicant knew or should have known, regardless whether the misrepresentation or omission was intentional. It is agreed that the Company can investigate the truth and completeness of such information while this policy is contestable.

By accepting this Policy, the Owner agrees to the beneficiaries named and corrections made. No change in plan, amount, benefits, or age at issue may be made on the Application unless the Owner agrees in writing. Only an authorized company officer may change the policy provisions. Neither the agent nor a medical examiner may pass on insurability.

Any policy issued on this Application will be owned by Proposed Insured 1 or the Applicant, if other than Proposed Insured 1.

NOTICE: Insurance laws may prohibit the owner of a life insurance policy from entering into any agreement to sell, transfer or assign a life insurance policy prior to the date the policy was issued, or within a period of time specified by state law after the date the policy was issued. The Owner should consult with legal advisors for any questions about these matters.

Any person who knowingly presents a false statement in an application for insurance may be guilty of a criminal offense and subject to penalties under state law.

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21 - 0147277

LIFE INSURANCE BUYER'S GUIDE

This guide can help you when you shop for life insurance. It discusses how to:

-- Find a Policy That Meets Your Needs and Fits Your Budget

-- Decide How Much Insurance You Need

-- Make Informed Decisions When You Buy a Policy

Prepared by the National Association of Insurance Commissioners

The National Association of Insurance Commissioners is an association of state insurance regulatory officials. This association helps the various insurance departments to coordinate insurance laws for the benefit of all consumers.

This guide does not endorse any company or policy.

Reprinted by
State Farm Life Insurance Company (Not in MA, NY, or WI)
Home Office: Bloomington, Illinois 61710

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

IMPORTANT THINGS TO CONSIDER

1. Review your own insurance needs and circumstances. Choose the kind of policy that has benefits that most closely fit your needs. Ask an agent or company to help you.
2. Be sure that you can handle premium payments. Can you afford the initial premium? If the premium increases later and you still need insurance, can you still afford it?
3. Don't sign an insurance application until you review it carefully to be sure all the answers are complete and accurate.
4. Don't buy life insurance unless you intend to stick with your plan. It may be very costly if you quit during the early years of the policy.
5. Don't drop one policy and buy another without a thorough study of the new policy and the one you have now. Replacing your insurance **may be costly**.
6. Read your policy carefully. Ask your agent or company about anything that is not clear to you.
7. Review your life insurance program with your agent or company every few years to keep up with changes in your income and your needs.

Buying Life Insurance

When you buy life insurance, you want coverage that fits your needs.

First, decide how much you need--and for how long--and what you can afford to pay. Keep in mind the major reason you buy life insurance is to cover the financial effects of unexpected or untimely death. Life insurance can also be one of many ways you plan for the future.

Next, learn what kinds of policies will meet your needs and pick the one that best suits you.

Then, choose the combination of policy premium and benefits that emphasizes protection in case of early death, or benefits in case of long life, or a combination of both.

It makes good sense to ask a life insurance agent or company to help you. An agent can help you review your insurance needs and give you information about the available policies. If one kind of policy doesn't seem to fit your needs, ask about others.

This guide provides only basic information. You can get more facts from a life insurance agent or company or from your public library.

What About the Policy You Have Now?

If you are thinking about dropping a life insurance policy, here are some things you should consider:

-- If you decide to replace your policy, don't cancel your old policy until you have received the new one. You then have a minimum period to review your new policy and decide if it is what you wanted.

-- It may be costly to replace a policy. Much of what you paid in the early years of the policy you have now, paid for the company's cost of selling and issuing the policy. You may pay this type of cost again if you buy a new policy.

-- Ask your tax advisor if dropping your policy could affect your income taxes.

-- If you are older or your health has changed, premiums for the new policy will often be higher. You will not be able to buy a new policy if you are not insurable.

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-- You may have valuable rights and benefits in the policy you now have that are not in the new one.

-- If the policy you have now no longer meets your needs, you may not have to replace it. You might be able to change your policy or add to it to get the coverage or benefits you now want.

-- At least in the beginning, a policy may pay no benefits for some causes of death covered in the policy you have now.

In all cases, if you are thinking of buying a new policy, check with the agent or company that issued you the one you have now. When you bought your old policy, you may have seen an illustration of the benefits of your policy. Before replacing your policy, ask your agent or company for an updated illustration. Check to see how the policy has performed and what you might expect in the future, based on the amounts the company is paying now.

How Much Do You Need?

Here are some questions to ask yourself:

-- How much of the family income do I provide? If I were to die early, how would my survivors, especially my children, get by? Does anyone else depend on me financially, such as a parent, grandparent, brother or sister?

-- Do I have children for whom I'd like to set aside money to finish their education in the event of my death?

-- How will my family pay final expenses and repay debts after my death?

-- Do I have family members or organizations to whom I would like to leave money?

-- Will there be estate taxes to pay after my death?

-- How will inflation affect future needs?

As you figure out what you have to meet these needs, count the life insurance you have now, including any group insurance where you work or veteran's insurance. Don't forget Social Security and pension plan survivor's benefits. Add other assets you have: savings, investments, real estate and personal property. Which assets would your family sell or cash in to pay expenses after your death?

What is the Right Kind of Life Insurance?

All policies are not the same. Some give coverage for your lifetime and others cover you for a specific number of years. Some build up cash values and others do not. Some policies combine different kinds of insurance, and others let you change from one kind of insurance to another. Some policies may offer other benefits while you are still living. Your choice should be based on your needs and what you can afford.

There are two basic types of life insurance: **term insurance** and **cash value insurance.** Term insurance generally has lower premiums in the early years, but does not build up cash values that you can use in the future. You may combine cash value life insurance with term insurance for the period of your greatest need for life insurance to replace income.

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Term Insurance covers you for a term of one or more years. It pays a death benefit only if you die in that term. Term insurance generally offers the largest insurance protection for your premium dollar. It generally does not build up cash value.

You can renew most term insurance policies for one or more terms even if your health has changed. Each time you renew the policy for a new term, premiums may be higher. Ask what the premiums will be if you continue to renew the policy. Also ask if you will lose the right to renew the policy at some age. For a higher premium, some companies will give you the right to keep the policy in force for a guaranteed period at the same price each year. At the end of that time you may need to pass a physical examination to continue coverage, and premiums may increase.

You may be able to trade many term insurance policies for a cash value policy during a conversion period--even if you are not in good health. Premiums for the new policy will be higher than you have been paying for the term insurance.

Cash Value Life Insurance is a type of insurance where the premiums charged are higher at the beginning than they would be for the same amount of term insurance. The part of the premium that is not used for the cost of insurance is invested by the company and builds up a cash value that may be used in a variety of ways. You may borrow against a policy's cash value by taking a policy loan. If you don't pay back the loan and the interest on it, the amount you owe will be subtracted from the benefits when you die, or from the cash value if you stop paying premiums and take out the remaining cash value. You can also use your cash value to keep insurance protection for a limited time or to buy a reduced amount without having to pay more premiums. You also can use the cash value to increase your income in retirement or to help pay for needs such as a child's tuition without canceling the policy. However, to build up this cash value, you must pay higher premiums in the earlier years of the policy. Cash value life insurance may be one of several types; whole life, universal life and variable life are all types of cash value insurance.

Whole Life Insurance covers you for as long as you live if your premiums are paid. You generally pay the same amount in premiums for as long as you live. When you first take out the policy, premiums can be several times higher than you would pay initially for the same amount of term insurance. But they are smaller than the premiums you would eventually pay if you were to keep renewing a term policy until your later years.

Some whole life policies let you pay premiums for a shorter period such as 20 years, or until age 65. Premiums for these policies are higher since the premium payments are made during a shorter period.

Universal Life Insurance is a kind of flexible policy that lets you vary your premium payments. You can also adjust the face amount of your coverage. Increases may require proof that you qualify for the new death benefit. The premiums you pay (less expense charges) go into a policy account that earns interest. Charges are deducted from the account. If your yearly premium payment plus the interest your account earns is less than the charges, your account value will become lower. If it keeps dropping, eventually your coverage will end. To prevent that, you may need to start making premium payments, or increase your premium payments, or lower your death benefits. Even if there is enough in your account to pay the premiums, continuing to pay premiums yourself means that you build up more cash value.

Variable Life Insurance is a kind of insurance where the death benefits and cash values depend on the investment performance of one or more separate accounts, which may be invested in mutual funds or other investments allowed under the policy. Be sure to get the prospectus from the company when buying this kind of policy and STUDY IT CAREFULLY. You will have higher death benefits and cash value if the underlying investments do well. Your benefits and cash value will be lower or may disappear if the investments you chose didn't do as well as you expected. You may pay an extra premium for a guaranteed death benefit.

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Life Insurance Illustrations

You may be thinking of buying a policy where cash values, death benefits, dividends or premiums may vary based on events or situations the company does not guarantee (such as interest rates). If so, you may get an illustration from the agent or company that helps explain how the policy works. The illustration will show how the benefits that are not guaranteed will change as interest rates and other factors change. The illustration will show you what the company guarantees. It will also show you what **could** happen in the future. Remember that nobody knows what will happen in the future. You should be ready to adjust your financial plans if the cash value doesn't increase as quickly as shown in the illustration. You will be asked to sign a statement that says you understand that some of the numbers in the illustration are not guaranteed.

Finding a Good Value in Life Insurance

After you have decided which kind of life insurance is best for you, compare similar policies from different companies to find which one is likely to give you the best value for your money. A simple comparison of the premiums is not enough. There are other things to consider. For example:

-- Do premiums or benefits vary from year to year?

-- How much do the benefits build up in the policy?

-- What part of the premiums or benefits is not guaranteed?

-- What is the effect of interest on money paid and received at different times on the policy?

Remember that no one company offers the lowest cost at **all** ages for **all** kinds and amounts of insurance. You should also consider other factors:

-- How quickly does the cash value grow? Some policies have low cash values in the early years that build quickly later on. Other policies have a more level cash value build-up. A year-by-year display of values and benefits can be very helpful. (The agent or company will give you a policy summary or an illustration that will show benefits and premiums for selected years.)

-- Are there special policy features that particularly suit your needs?

-- How are nonguaranteed values calculated? For example, interest rates are important in determining policy returns. In some companies increases reflect the average interest earnings on all of that company's policies regardless of when issued. In others, the return for policies issued in a recent year, or a group of years, reflects the interest earnings on that group of policies; in this case, amounts paid are likely to change more rapidly when interest rates change.

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21-0147277

STATE FARM LIFE INSURANCE COMPANY

Summary of the Louisiana Life and Health Insurance Guaranty Association Act and Notice Concerning Coverage Limitations and Exclusions

Residents of Louisiana who purchase life insurance, annuities, or health insurance should know that the insurance companies licensed in this state to write these types of insurance are required by law to be members of LLHIGA. The purpose of LLHIGA is to assure that policyholders will be protected, within limits, in the unlikely event that a member insurer becomes financially unable to meet its obligations. If this happens, LLHIGA will assess its other member insurance companies for the money to pay the covered claims of insured persons who live in this state and, in some cases, to keep coverage in force. However, the valuable extra protection provided by these insurers through LLHIGA is limited. As noted in the disclaimer below, this protection is not a substitute for consumers' care in selecting companies that are well-managed and financially stable.
Except as provided in R.S. 22:2098(D), when an insurer delivers a policy or contract described in R.S. 22:083(B)(1), then prior to or at the time of delivery, the disclaimer notice described in R.S. 22:2098(C) and approved by the commissioner, shall be given separately to the policy or contract holder.

Disclaimer

The Louisiana Life and Health Insurance Guaranty Association provides coverage of claims under some types of policies if the insurer becomes impaired or insolvent. *COVERAGE MAY NOT BE AVAILABLE FOR YOUR POLICY.* Even if coverage is provided, there are significant limits and exclusions. Coverage is generally conditioned upon residence in this state. Other conditions may also preclude coverage.
Insurance companies and insurance agents are prohibited by law from using the existence of the association or its coverage to sell you an insurance policy.
You should not rely on availability of coverage under the Louisiana Life and Health Insurance Guaranty Association when selecting an insurer.
The Louisiana Life and Health Insurance Guaranty Association or the Department of Insurance will respond to any questions you may have which are not answered by this document.

LLHIGA
PO Drawer 44126
Baton Rouge, Louisiana 70804

Department of Insurance
PO Box 94214
Baton Rouge, Louisiana 70804-9214

The state law that provides for this safety-net coverage is called the Louisiana Life and Health Insurance Guaranty Association Law (the law), and is set forth at R.S. 22:2081 et seq. The following is a brief summary of this law's coverages, exclusions and limits. This summary does not cover all provisions of the law; nor does it in any way change any person's rights or obligations under the law or the rights or obligations of LLHIGA.

COVERAGE

Generally, individuals will be protected by the Life and Health Insurance Guaranty Association if they live in this state and hold direct non-group life, health, or annuity policy or contract, a certificate under a direct group policy or contract for a supplemental contract to any of these, or an unallocated annuity contract, issued by an insurer authorized to conduct business in Louisiana. The beneficiaries, payees, or assignees of insured persons may also be protected as well even if they live in another state unless they are afforded coverage by the guaranty association of another state, or other circumstances described under the law are applicable.

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EXCLUSIONS FROM COVERAGE

A person who holds a direct non-group life, health, or annuity policy or contract, a certificate under a direct group policy or contract for a supplemental contract to any of these, or an unallocated annuity contract is not protected by LLHIGA if:

(1) they are eligible for protection under the laws of another state (This may occur when the insolvent insurer was incorporated in another state whose guaranty association protects insureds who live outside that state.);
(2) the insurer was not authorized to do business in this state;
(3) their policy was issued by a nonprofit hospital or medical service organization, an HMO, a fraternal benefit society, a mandatory state pooling plan, a mutual assessment company or similar plan in which the policyholder is subject to future assessments, an insurance exchange, an organization that issues charitable gift annuities as is defined in R.S. 22:952(A)(3), or any entity similar to any of these.

LLHIGA also does not provide coverage for:

(1) any policy or portion of a policy which is not guaranteed by the insurer or for which the individual has assumed the risk, such as a variable contract sold by prospectus;
(2) any policy of reinsurance (unless an assumption certificate was issued);
(3) interest rate or crediting rate yields, or similar factors employed in calculating changes in value, that exceed an average rate;
(4) dividends, premium refunds, or similar fees or allowances described under the Law;
(5) credits given in connection with the administration of a policy by a group contract holder;
(6) employers', associations' or similar entities' plans to the extent they are self-funded (that is, not insured by an insurance company, even if an insurance company administers them) or uninsured;
(7) unallocated annuity contracts (which give rights to group contract holders, not individuals), except unallocated annuity contracts and defined contribution government plans qualified under section 403(b) of the United States *Internal Revenue code* (26 U.S.C. Section 403(b)).
(8) an obligation that does not arise under the express written terms of the policy or contract issued by the insurer to the policy owner or contract owner, including but not limited to, claims described under the law;
(9) A policy or contract providing any hospital, medical, prescription drug or other health care benefits pursuant to "Medicare Part C coverage" or "Medicare Part D coverage" and any regulations issued pursuant to those parts;
(10) Interest or other changes in value to be determined by the use of an index or other external references but which have not been credited to the policy or contract or as to which the policy or contract owner's rights are subject to forfeiture, as of the date the member insurer becomes an impaired or insolvent insurer, whichever is earlier.

LIMITS ON AMOUNTS OF COVERAGE

The Louisiana Life and Health Insurance Guaranty Association Law also limits the amount that LLHIGA is obligated to pay out. The benefits for which LLHIGA may become liable shall in no event exceed the lesser of the following:

- For any one insured life, regardless of the number of policies or contracts there are with the same company, LLHIGA will pay a maximum of $300,000 in life insurance death benefits, but not more than $100,000 in net cash surrender and net cash withdrawal values for life insurance.
- LLHIGA cannot pay more than what the insurance company would owe under a policy or contract if it were not an impaired or an insolvent insurer.
- For any one insured life, regardless of the number of policies or contracts there are with the same company, LLHIGA will pay a maximum of $500,000 in health insurance benefits, and LLHIGA will pay a maximum of $250,000 in present value of annuities, including net cash surrender and net cash withdrawal values.

In no event, regardless of the number of policies and contracts there were with the same company, and no matter how many different types of coverages, LLHIGA shall not be liable to expend more than $500,000 in the aggregate with respect to any one individual.

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IMPORTANT TAX INFORMATION CONCERNING YOUR LIFE INSURANCE POLICY

Money that is deemed removed ("distributed") from or grows within some life insurance policies may be taxed. The following briefly describes examples of how this could occur. Your tax advisor must determine the taxation of your specific situation.

What is a "distribution" from the policy?

The term distribution is used in the tax laws to describe the deemed withdrawal of values from the policy. Typical withdrawals include: withdrawals of cash value, loans, assignments of contract values to another person, or crediting of a dividend, unless it is used to purchase additional insurance or to pay a premium.

How are policies normally taxed?

Generally, death benefits are not subject to income tax. Values inside the policy grow tax-free. Loans are tax-free until you surrender the policy or allow it to lapse. Other distributions are tax-free until all premiums are returned, and distributions above that amount are taxed as "gain."

What is "gain"?

Gain simply means your policy has a larger value than the total amount of premiums you have paid, net of some amounts such as premiums that have been returned through dividends. The gain is the difference between the value of your policy and the premiums paid. For example, if a policy has a value of $1,000.00 and premiums of $800.00 have been paid, the gain is $200.00. It is only the $200.00 gain that would be subject to tax.

When might my policy be taxed differently?

Certain actions that you take may result in various situations where your policy may be taxed differently, including but not limited to the following:

- -- Pay premium above the limits specified in the tax laws
- -- Change the amount of insurance, including paid-up additions, such as through partial withdrawals
- -- Add, cancel, or change rider coverage or amounts

Also certain distributions are taxable - but only to the extent of the gain in your policy. Any gain is considered to be the first - rather than the last - amount withdrawn; so, any distribution is taxed until the amount of the gain is reached. After that, the remainder of the distribution is not taxed.

If the distribution occurs before age 59$^{1}/_{2}$, the IRS may impose a 10% additional tax on the amount of the distribution that is taxable.

In extreme situations, the policy may be disqualified as "life insurance" for tax purposes. That means the policy's internal cash value growth could be taxable.

How will I know for certain how my policy is taxed?

Prior to taking actions such as those listed above, you may wish to contact your tax advisor to find out for certain how your policy will be taxed. In some cases the tax consequences of these actions may be irreversible.

Policyholder Information Service

State Farm Life Insurance Company
Home Office:
Bloomington, Illinois 61710-0001

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-0147277

STATE FARM LIFE INSURANCE COMPANY

POLICY DELIVERY RECEIPT

I acknowledge receiving my policy on the date shown below.

POLICY # [redacted] OWNER JOHN-CLIFFORD JOSEPH KING, SR

DATE _____ SIGNATURE OF OWNER _____

AGENT: After having both copies of the form signed, give one to the Owner and send one to State Farm.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
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21-0147277

STATE FARM LIFE INSURANCE COMPANY

POLICY DELIVERY RECEIPT

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DATE _____ SIGNATURE OF OWNER _____

AGENT: After having both copies of the form signed, give one to the Owner and send one to State Farm.

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StateFarm®

Social Security Number (SSN) or Taxpayer Identification Number (TIN) Certification – Substitute W-9

Applicant — By signing this application, I certify under penalties of perjury that
(1) The Social Security Number/TIN shown above is correct, and
(2) I am a U.S. citizen or other U.S. person (defined below), and
(3) Backup Withholding:
- ◉ I am not subject to backup withholding either because I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of failure to report all interest or dividends, or the IRS has notified me that I am no longer subject to backup withholding or I am exempt from backup withholding.
- ○ I am subject to backup withholding.

(4) I am exempt from reporting under the Foreign Account Tax Compliance Act (FATCA) with respect to the account(s) for which this form has been requested because I hold or otherwise maintain the account(s) in the United States.

Definition of U.S. person. For federal tax purposes, you are considered a U.S. person if you are:
- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding. For instructions on how to complete the form, visit the IRS website at www.irs.gov or contact your local IRS office.

DocuSigned by:
[signature]
Proposed Insured 1 Signature (Signature not required for juvenile application) — 11/16/2018 Date (MM/DD/YYYY) — SIGNATURE

Proposed Insured 2 Signature — Date (MM/DD/YYYY) — SIGNATURE

Applicant Signature — Date (MM/DD/YYYY) — SIGNATURE

Applicant's signature is not required unless Applicant is other than Proposed Insured 1. If a firm or corporation is to be the policyowner, please provide company name and signature of an authorized officer.

DocuSigned by:
Jennifer Ambrose
Agent/Licensed Insurance Producer Signature — 11/19/2018 Date (MM/DD/YYYY) — SIGNATURE

At Lake Charles City — LA State

ICC16 1004522 LF-3805-9195 1006730 2002 144512 202 02-10-2016

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Calcasieu Parish Sheriff's Office
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BASIC PLAN DESCRIPTION

Whole life insurance with premiums payable to the Policy Anniversary shown under Premiums Payable on page 3 while the Insured is alive. Insurance is payable when the Insured dies. The Basic Plan is eligible for Annual Dividends.

4. State Farm - King Email

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

John C. J. King Sr. Sr.

[redacted]

Tried calling [redacted]
2/11/22
12.20

Don Harris of State Farm Insurance

1614 Gerstner Memorial Dr,

Lake Charles, LA, 70601

Good afternoon Mr. Harris

We have been in communication with your office since late May 2021 expressing concerns about my "policies". I have sent you the beneficiary change form via email and I have not received a confirmation of the change, nor have I received the requested copy of the original beneficiary form was used to make Dwade and Charmaine Colston my beneficiaries. I was reissued a policy back to me, but the problem still exists that someone who is not my spouse and does not have insurable interest in me STILL has an active spousal policy on me. I see your email is no longer working so I send this letter in a last attempt to get you to send me the original copies of all policies and beneficiary forms that have been submitted that were promised. The delay is no longer acceptable nor appreciated. I am making this request in good faith. I need a response within the next 7 business days from the receipt of this letter.

Thank you for your attention to this matter.

John C. J. King Sr.

02-04-2022

21-0147277

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Gmail John King <johncjking86@gmail.con

OLLOW UP

messages

on Harris <don.harris.b254@statefarm.com> Thu, Dec 2, 2021 at 9:51 A
[redacted]

Good morning John, this is just a courtesy follow-up on your previous request. As per your request, your policy address of record was changed to [redacted] Also, as per your request, the billing was taken out of the monthly account of Charmaine Colston. It is currently paid to November 16, 2021. In addition, I have not heard from you on the change of beneficiary form that I forwarded to you last month. If you would like for me to transfer your policy to an agent who is closer to you, please let me know and I will get your records to that agent which may improve the servicing of your business.

Please let me know if you have any questions and I hope you have a Merry Christmas.

---

ohn King [redacted] Sat, Dec 11, 2021 at 7:32 P
: Don Harris <don.harris.b254@statefarm.com>

Why does it say I owe that amount?
What happened to the cash value that was in the policy?
I still don't have viewing access to the policy.
I am not receiving billing statements for my seperated policy.
I need the original form that designated charmaine as my primary and dwade as my secondary beneficiary.
I want to put the policy premium on a monthly draft.
[Quoted text hidden]
--

J.C.J. King

---

2 attachments

Change of Beneficiary (2).pdf
3446K

State Farm (3).pdf
275K

---

hn King [redacted] Mon, Jan 3, 2022 at 6:57 P
: Don Harris <don.harris.b254@statefarm.com>

Hey Don Happy New Year and I hope all is well with you. I'm sending this email as a follow up from when we last spoke. I asked for the original beneficiary forms on my policy and you stated you would get those to me. I still have not received them and If there is anything I can do to help speed up this process please let me know.

[Quoted text hidden]
--

J.C.J. King

---

ail Delivery Subsystem <mailer-daemon@googlemail.com> Mon, Jan 3, 2022 at 6:57 P
[redacted]n

Address not found

21-0147277

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Gmail John King <johncjking86@gmail.co

:OLLOW UP

messages

)on Harris <don.harris.b254@statefarm.com> Thu, Dec 2, 2021 at 9:51 /
o: [redacted]

Good morning John, this is just a courtesy follow-up on your previous request. As per your request, your policy address of record was changed to 123 N LOUISIANA AVE , Lake Charles, La 70601. Also, as per your request, the billing was taken out of the monthly account of Charmaine Colston. It is currently paid to November 16, 2021. In addition, I have not heard from you on the change of beneficiary form that I forwarded to you last month. If you would like for me to transfer your policy to an agent who is closer to you, please let me know and I will get your records to that agent which may improve the servicing of your business.

Please let me know if you have any questions and I hope you have a Merry Christmas.

---

ohn King [redacted] Sat, Dec 11, 2021 at 7:32 I
o: Don Harris <don.harris.b254@statefarm.com>

Why does it say I owe that amount?
What happened to the cash value that was in the policy?
I still don't have viewing access to the policy.
I am not receiving billing statements for my seperated policy.
I need the original form that designated charmaine as my primary and dwade as my secondary beneficiary.
I want to put the policy premium on a monthly draft.
[Quoted text hidden]
--
J.C.J. King

2 attachments

Change of Beneficiary (2).pdf
3446K

State Farm (3).pdf
275K

---

ohn King [redacted] Mon, Jan 3, 2022 at 6:57 I
o: Don Harris <don.harris.b254@statefarm.com>

Hey Don Happy New Year and I hope all is well with you. I'm sending this email as a follow up from when we last spoke. I asked for the original beneficiary forms on my policy and you stated you would get those to me. I still have not received them and If there is anything I can do to help speed up this process please let me know.

[Quoted text hidden]
--
J.C.J. King

---

lail Delivery Subsystem <mailer-daemon@googlemail.com> Mon, Jan 3, 2022 at 6:57 I
o: johncjking86@gmail.com

Address not found

21-0147277



the address couldn't be found, or is unable to receive mail.

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

The response from the remote server was:

```
550 5.1.1 User Unknown
```

Final-Recipient: rfc822; don.harris.b254@statefarm.com
Action: failed
Status: 5.1.1
Remote-MTA: dns; mxb-00104b02.gslb.pphosted.com. (205.220.177.182, the server for the domain statefarm.com.)
Diagnostic-Code: smtp; 550 5.1.1 User Unknown
Last-Attempt-Date: Mon, 03 Jan 2022 15:57:33 -0800 (PST)

---------- Forwarded message ---------
From: John King <[redacted]>
To: Don Harris <don.harris.b254@statefarm.com>
Cc:
Bcc:
Date: Mon, 3 Jan 2022 18:57:22 -0500
Subject: Re: FOLLOW UP
----- Message truncated -----

21-0147277

5. King Email Statement

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-147277

Kent Castille

From: John King [redacted]
Sent: Wednesday, April 20, 2022 7:30 AM
To: Kent Castille
Subject: Insurance timeline [EXT]

External Email: This message does NOT originate from the CPSO network. Do not click links or open attachments unless you know the content is safe. Report suspicious messages to CIS immediately. (mail-ua1-f44.google.com - United States)

05/28/2021- I contacted state farm national to inquire about the cash value of my existing whole life policy that i had issued in 2018 to aid in increasing my face value. At this time I was told that my policy no longer existed and the ownership had been changed.

06/03/2021- I contacted the Starm Farm Field Agency of Don Harris 1614 HWY 14 Lake Charles, LA 70601 Phone number 337-439-2747, Noone responded initially to phone calls so I sent an urgent fax in writing to Don Harris office. He returned my call to let me know that not only had my whole life policy that I owned since 2018 been transferred without authorization to my ex girlfriend, but the ex girlfriend (Charmaine Y Colston) also removed my mother and brother as beneficiaries and committed fraud and identity theft.

> Ms Colston did not have my permission to change any beneficiaries

> Ms.. Colston is not nor has she ever been my wife, and she misrepresented herself as my wife and Ms Jennifer Ambrose asked for no proof of Marriage.

- He told me that I should review the statements for more information but he remembered clearly when she came into the office to change my beneficiary on my policy while I was not present.

- Jennifer Ambrose proceeded to illegally and without cause illegally transfer the exisiting policy from 2018 that I owned and rolled the cash value into TWO entire new policies owned completely by my ex girlfriend Charmaine Y Colston. I was deceived, and taken advantage of. I was assured my mother and brother would continue to be the beneficiaries, they proceeded to conspire with Charmaine Colston behind my back to change the beneficiaries to Ms Colston using a forged signature.
- Jennifer Ambrose then proceeded to underwrite an additional "spousal" policy for a woman that was not and never has been my spouse. She did not ask for a marriage certificate or evidence that we were legally married. Charmaine Colston contacted me and said that my policy from 2018 needed to be increased to have more insurance coverage should i pass my children would be covered. I was out of state at the time in Texas which legally did not permit any underwriting of new policies because I was a Texas resident at the time, however Ms Colston, sided by Jennifer Ambrose proceeded to fraudulently steal the cash value in my existing policy by transferring it into new policies owned by Charmaine Colston. These new policies from July 2020 were to be owned ENTIRELY by Charmaine Y Colston and face value after the riders added would total over $650,000.00 in face value for which she was the SOLE beneficiary.
- This was achieved using the following lies during the policies underwriting for which the agent received a large commission and Charmaine Colston successfully achieved investment securities ownership of the cash surrendered value of my policy form 2018, but also without written evidence of insurable interest of any sort take on full ownership of all of my policies held at State Farm.
- Ms.Colston represented herself as "spouse" on the insurance application, and additionally proceeded to sign her name as Charmaine Colston King and stated on the application that her relationship to me was "spouse" in writing. Without evidence.
- Ms. Colston proceeded once again to fraudulently forge my signature on the application which violates the truth in underwriting act. MS. Colston took unauthorized use of my home computer while I lived in Texas to break into my email account and forge my name to the policy documents.

06/04/21

- Jennifer Ambrose was made aware of the error and I demanded the policy be cancelled, Jennifer then risked my life and safety to contact Ms Colston who proceeded to threaten me saying I was dead, a walking dead man, she was going to blow my brains out and admitted in writing to fraudulently changing the beneficiaries by forgery, and also in writing stated that she had in fact lied to obtain the policies, she did not regret it, and she would soon "end me" and for me to wait and see. Ms. Colston also refused to cancel the policy after I told her it would never pay out as she was not my spouse and had lied in underwriting.

- Important to note that there are many restraining orders against Ms Colston in multiple states for threats against my life, safety, and my career. There are criminal charges and evidence that she has committed fraud at multiple financial institutions across the state of Louisiana by assuming my identity falsely to transfer financial assets and my personally owned property into her ownership. The Calcasieu Parish District Attorney has charges pending as well as multiple cases in the states of New York and New Jersey.
_ I have written evidence of all facts on the timeline above and I am demanding that ALL policies issued to Charmaine Colston be cancelled immediately as I will be seeking to recover damages, and criminal charges.
- I am demanding that immediately State Farm reinstate my whole life policy and restore my previous guaranteed insurability to my 2018 rates, I am also demanding that my face value be increased and reissued in a policy face value equal or greater
- I am demanding that Ms Colstons criminal behavior be punished and any one who neglected their duty of due diligence be reprimanded.
- I am demanding that financial damages and restitution be paid for my losses. The financial loss of insurability, the time value of my investment dollars as I was paying $350 + dollars into a policy that I was told was owned solely by I John King Sr. (Why would I pay a premium that big for which the bulk of the premium went into a policy owned by Charmaine Colston, I was never aware that she owned a policy on me, I never authorized it, and I had no clue Ms. Colston owned a policy.
I am demanding that all policies owned by Charmaine Y Colston be cancelled on or before October 25, 2021 and that I receive formal notice of the cancellation.
- I demand continuing education for Jennifer Ambrose as she unknowingly put my life in danger by issuing a policy to a woman who suffers from mental illness, has defrauded other banks and financial institutions by way of forgery of my name and I in turn have had to endure months of mental abuse, harassment, death threats and torture which has caused high blood pressure and a host of medical issues that I will now battle foe the entirety of my life.

I am demanding a full and thorough investigation which will verify what I assert above is that Jennifer Ambrose did not perform the necessary and proper due diligence in underwriting. She did not obtain proper identification and marriage license.

--
J.C.J. King

6. State Farm Subpoena

Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-147277

SUBPOENA NOTICE

TO: STATE FARM INS CO/THRU CORP SERVICE CO
CUSTODIAN OF RECORDS FAXING

14th Judicial District Court
Parish of Calcasieu
State of Louisiana

RE: A MATTER UNDER AN ACTIVE INVESTIGATION
Under Clerk file number: **1168-MIS-2022**

YOU ARE HEREBY NOTIFIED:
To release the following records upon receipt

See Attached Motion and Order

All in accordance with a certified copy attached hereto and made part here of.

SUBPOENAED BY: DET. KENT CASTILLE, CPSO

Witness the Honorable, Judges of said court at Lake Charles, LA, this 21ST day of APRIL, 2022.

Issued and delivered APRIL 21ST , 2022.

Sheila Funderburk

SHEILA FUNDERBURK
Deputy Clerk of Court

SERVICE INFORMATION

RECEIVED on the _____ day of _____, 20_____ and on the _____ day of_____, 20_____ served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:
PARISH OF _____ this _____ day of _____, 20____

By:_____
Deputy Sheriff

Doc ID: *CS047884890001* Case#: 1168-MIS-2022
Docket Date: 4/21/2022 12:00:00 AM Pages: 1
SUBPOENA FOR FAX ISSUED TO

[TRUE COPY]

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

THE DISTRICT ATTORNEY OF
THE PARISH OF CALCASIEU

APPLYING FOR A SUBPOENA
TO OBTAIN INFORMATION
NEEDED IN AN ACTIVE
INVESTIGATION BY THE
CALCASIEU PARISH
SHERIFF'S OFFICE

FILED: APR 21 2022

14TH JUDICIAL DISTRICT COURT

STATE OF LOUISIANA

PARISH OF CALCASIEU

DEPUTY CLERK

MOTION AND ORDER FOR SUBPOENA DUCES TECUM

NOW INTO COURT, comes the State of Louisiana through Stephen Dwight, District Attorney, represented herein by the undersigned Assistant District Attorney, who respectfully represents to the Court that:

1.

The Calcasieu Parish Sheriff's Office is currently investigating criminal activity (Case 2021-00147277) in reference to a Forgery. The victim stated he observed numerous changes and unauthorized policies created under his identity through State Farm Insurance Company. The victim stated he did not consent to the creation nor authorize any individual or State Farm employee to transfer the policies that he created to the subject's State Farm account. State Farm employees stated that an internal investigation had been conducted and is currently being requested.

2.

In order to complete said investigation it is necessary to obtain ANY and ALL information associated with the State Farm Insurance Company records associated with the complaint and fraud report/investigation concerning John Clifford King (Social Security Number [redacted] full number available upon request) who is a customer of State Farm Don Harris branch within Lake Charles, LA, to include but not be limited to the full fraudulent investigation conducted by State Farm Insurance Company with all documents, notes, statements, and investigation conclusion.

3.

State Farm Insurance Company, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802, has indicated that the requested information cannot be released without a subpoena ordering them to do so.

4.

Said subpoena is proper under R.S. 6:333(F)(13)

CONSIDERING THE FOREGOING:

IT IS ORDERED that a Subpoena Duces Tecum issued to State Farm Insurance Company, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802, provide ANY and ALL information associated with the complaint and fraud report/investigation concerning John Clifford King (Social Security Number [redacted] full number available upon request) who is a customer of State Farm Don Harris branch within Lake Charles, LA, to include but not be limited to the full fraudulent investigation conducted by State Farm Insurance Company with all documents, notes, statements, and investigation conclusion.

Said records are to be made available to Detective Kent Castille of the Calcasieu Parish Sheriff's Office preferably electronically by email to FinancialRecords@cpso.com or by mail to 5400 East Broad Street, Lake Charles, LA, 70615 no later than May 30, 2022. Detective Castille can be reach by either email or phone (337) 431-8094.

THIS DONE AND SIGNED in Chambers this 21 day of April 2022

District Judge

Assistant District Attorney

30507

Bar Roll Number

A TRUE COPY
Lake Charles, Louisiana

Deputy Clerk of Court
Calcasieu Parish, Louisiana

APR 21 2022

7. Colston Email Statement

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Kent Castille

From: charmaine colston [redacted]
Sent: Wednesday, May 4, 2022 2:29 PM
To: Kent Castille
Subject: Case # 2021-00147277

This Message Is From an External Sender
This message came from outside your organization.

Detective Castille,

Below is my, Charmaine Y. Colston, statement for the referenced case.

John King, Sr. (4/17/1986) and I were together since December 2006. We had our first child together in September 2008.

Spring 2012, John King, Sr. proposed to me.

2017, we got a life Insurance policy. I am the policy holder and John is a rider on the policy.

November 2018, we had our third child together. After our third child, John and I discussed increasing our life insurance policy.

We did so between 2019-2020, I do not remember the exact date. Mine was increased and his was increased.

John spoke with the insurance company , he answered health questions and he did lab-work. All correspondence regarding authorizing the policy being increased was done between John and the insurance company. He had to approve it/sign and he did.

After hurricane Laura in 2020, John left for " temporary work " in NJ November 2020.

John contacted me June 2021 via email and phone (please see attached); stating he hired an estate planner and they contacted State Farm; He said he was upset to know after all this time he had been working in the plant, if he died the policy would not pay out, due to an error with the name on the policy. He said he was pissed off because the plant blew up before and had he died , the children would not be taken care of.

Today, 5/4/2022, I was informed by Kallie S. (examiner of the file/case) with the Louisiana Insurance Commissioner's office that John contacted them in October 2021 attempting to change the policy; he was told he could not without the policy holder (Charmaine Y. Colston) consent. The file was closed November 2021. Kallie S. also advised John did not contact them to make a complaint against me.

Kallie S. Contact number is 1-800-259-5300. She is in the consumer service/complaint department.

John never stated the policy was forged nor that he didn't want it.

Without being left unsaid, It is highly believed John has gone to these extreme measures to falsify police reports to have the policy , he consented to/ and had knowledge of almost two/three years ago, canceled due to his influence and relationship with his now girlfriend.

Please note: I also would like to file a report for defamation of character and John King filing False Police Reports.

Truthfully Submitted,
Charmaine Y. Colston

8. Ambrose Statement

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-147277

02/26/2022

Regarding Mr. John King Clifford claim regarding theft and fraud.

Charmaine Colston came to the office inquiring about life insurance. I ask her if she had any idea what amount they wanted to look at, she asks for quotes. I give her several quotes for her and John to look at. Charmaine stated she would get back with me when they decided the amount. It was several weeks later before she called and stated the amount, they agreed on which was 300,000 20-term on her and 500,000 20yr term on him.

Charmaine explained due to John's work schedule it would hard for him to come in the office to complete the application. I explained to her that I could take both application over the phone and email the application, and they would be able to sign through E-doc. I called spoke with John ask him all the questions, he agreed upon the amount he sign, and the same with Charmaine. The application was emailed back to me, I signed and submitted application to the company. Both John and Charmaine name each other as beneficiary on each other's policies. Policy was forwarded to underwriting they had 30 days to accept or reject policy.

I was informed by the company due to the amount of coverage; John would be schedule to do and exam and answer more questions. The application was turn over to the company, and all company procedures was followed up by the company.

This policy was written on October 6, 2020, and on or around September or October of 2021 I received a call from John's Financial Advisor to cancel the policy. I informed her that because of company procedure I cannot cancel any policy without the owner's permission which is Charmaine. She continues to call demanding that policy be cancel and I continue to explain company procedure. A complaint was filed with Louisiana Insurance Commission and all procedure was found to be followed correctly and no fraud or any misrepresentation was found. This statement is true to the best of my knowledge.

Jennifer Ambrose

9. Harris Statement

April 20. 2022

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

21-147277

Re: John King

This statement is In regards to John King's claim that our office committed fraud and theft when we wrote the life insurance policies on himself, Charmaine and their children.

I wrote one of his life policies in 2011. It was written at $100,000 on John King as policyowner. His beneficiaries were his mother and his brother. It lapsed due to nonpayment of premium in 2014. I wrote another life policy in 2017 that included Charmaine Colston as owner and John king as an additional rider.

None of the policies I wrote were solicited. John and Charmaine came to our office inquiring about life insurance. The various policies we offered were discussed and explained in detail. They chose the policy that best fit their neeas and affordability. Charmaine and John named their beneficaries. The names of each beneficary and their relationships were recorded and each signature was witnessed by me. The applications were forwarded to our Uderwriting Dept for review, approval and issurance. Once the policies are issued, the policyholder has 30 days to reject or accept the policy. If rejected, a full refund is returned to the customer.

Staff member, Jennifer Ambrose also wrote additional policies on John and Charmaine.

John filed an Ins Dept complaint with the Louisiana Insurance Commissioner claiming that his policy was transferred to Charmaine and that his beneficiries were changed without his consent.

I believe John is confused. His first policy did name his mom and brotheer as beneficiaries and he was the owner but the policy lapsed because the premium was not paid. However, a new policy was written however Charmaine was named primary beneficiary as per John's request.

These policies were underwritten and reviewed by State Farm underwriters and physical examinations were conducted by independent medical vendors. Any discrepancy, misrepresentation and questions are normally addressed during this phase of our underwriting. John had no concerns regarding signatures or beneficiaries at this point.

We are prohibited from making any changes on any policy without the written consent of the policyholder and such changes have to be endorsed and approved by company officials. Copies of any changes are mailed to the customer.

Finally, John's financial advisor called demanding that the policies be cancelled. After receiving

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

John*s approval to discuss his policy with her, we told his advisor that John was not the owner of policies in question and could not cancel them. He then filed an Insurance Dept Complaint with the State of Louisiana which was answered by State Farm and the complaint was closed by the Dept of Insurance after their review of our response.

I urge you to contact State Farm and request a copy of the complaint and our answer which included copies of signed documents by John and Charmaine.

Although I retired on 12/31/2021 and do not have access to company documents, I am available for any questions.

This statement is true to my best recollection.

Don Harris

21-147277

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Lake Charles, Louisiana, May 31, 2022

Court met in Courtroom 'I', His Honor Mitch Redd, Judge presiding, with Ron Castille, Deputy Sheriff; Logan Bertrand, Deputy Clerk of Court; and Jaclyn Istre, Court Reporter, in attendance. **********

2021-002773 JOHN CLIFFORD JOSEPH KING SR
Vs.
CHARMAINE COLSTON

This matter comes before the Court for a Trial on the Merits of various rules filed by the parties, same being regularly fixed.

Present: (Plaintiff)
Scott Hawkins, Esq., Counsel for the Plaintiff; and
John Clifford J. King, Sr., the Defendant.

(Defendant)
Orelia Rachel Lawdins, Esq., Counsel for the Defedant; and
Charmaine Colston, the Defendant.

Following a pretrial conference, joint stipulations are dictated to the Court Reporter and recognized by the Court. Mr. King does not fear for his life due to Ms. Colston. Mr. King is to pay two-thousand five-hundred (2500) dollars in past due child support, Mr. King is to continue paying past accrued arrearages and monthly obligations, and Mr. King is to pay seven-hundred and fifty (750) dollars in attorney's fees within sixty (60) days or face potential incarceration. Both parties are not to communicate about anything outside of the child(ren)'s wellbeing on OurFamilyWizard or face a two-thousand five-hundred (2500) dollar fine. The days and times of visitation are set, transfer of the children is to occur at a safe public location or at a school. The parties can utilize the police to facilitate transfer in the event of an emergency. The harassment injunction remains in full effect. The defendant's motion to vacate is to be granted and the motion to quash is dropped. The plaintiff's motions of contempt are dropped and the subpoenas issued are dropped. Mr. Hawkins reserves the rights to re-issue subpoenas in any future adjudication. All child support payments are to be through Zelle. There has been no insurance fraud on behalf of Ms. Colston. Parties sworn. Parties are questioned and state that they understand and agree to abide by the stipulations. Formal decree to be signed upon presentation by Mr. Hawkins. Further, the Court orders this matter set for status on the trial week of October 31, 2022 at 9:00 AM and this matter is set for a Hearing Officer conference on September 8, 2022 at 1:30 PM. Both parties receive notice in open court of same. For complete colloquy, see Court Reporter's transcript.

Parties Sworn: (Plaintiff)

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

John Clifford J. King, Sr.

(Defendant)
Charmaine Colston.

Court adjourned.

Attest: _____ _____
Deputy Clerk of Court DISTRICT JUDGE

OfficerID: CPSOAPPS\ephillips, INITIAL REPORT

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

On December 9, 2021, at approximately 1315 hours, I, Sgt. Elliott Phillips was working the front Administration Desk, when a forgery complaint was being reported. The complainant, stated his ex-girlfriend has been threatening him and also opened a large life insurance policy on him. The complainant was advised a report would be done on the incident and Detectives would be in contact with him.

EOR/NFI
Sgt. Elliott Phillips 12808

CPSO Case, Officer: CPSOAPPS\ephillips, Supervisor: CPSOAPPS\jdansby, Merged By: CPSOAPPS\tcurol

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT CASE# **2021-00147277**

5400 E. Broad St.
Lake Charles, LA 70615

EVENT

REPORTED DATE/TIME	OCCURRED INCIDENT TYPE	
12/9/2021 13:15	Threats	
OCCURRED FROM DATE/TIME	**OCCURRED THRU DATE/TIME**	**LOCATION OF OCCURRENCE**
12/09/2021 13:15	12/09/2021 13:15	123 LOUISIANA AVE LAKE CHARLES, LA

OFFENSES

	STATUTE/DESCRIPTION	COUNTS	ATTEMPT/COMMIT
01	14:38 Simple Assault	1	Completed
02	14:72 Forgery	1	Completed

SUBJECT

JACKET/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE SUFFIX)					
Adult	Suspect	Colston, Charmaine					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted]	32	[redacted]					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black		Female					
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2	PHONE #3			
		[redacted]					

SUBJECT

JACKET/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE SUFFIX)					
Adult	Victim	King, John					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
[redacted]	35	[redacted]					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
Black		Male					
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2	PHONE #3			
[redacted]		[redacted]					

SUBJECT

JACKET/SUBJECT TYPE		NAME (LAST, FIRST, MIDDLE SUFFIX)					
DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)					
RACE		SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE	
DL NUMBER/STATE		PRIMARY PHONE	PHONE #2	PHONE #3			

REPORTING OFFICER	DATE	REVIEWED BY	
Phillips, Elliott	12/9/2021	Dansby, Jeremy M	12/09/2021

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.

Lake Charles, LA 70615

CASE# **2021-00147277**

GENERAL PROPERTY

GENERAL	PROPERTY CODE			VALUE
	Counterfeit/Forged			**$1.00**
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
		77 Other		
	ITEM DESCRIPTION			
	Signature on Life Insurance Policy forged.			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

GENERAL	PROPERTY CODE			VALUE
	QUANTITY/UNIT OF MEASURE	PROPERTY TYPE/CLASS	SERIAL	COLOR
	ITEM DESCRIPTION			

REPORTING OFFICER	DATE	REVIEWED BY	
Phillips, Elliott	**12/9/2021**	**Dansby, Jeremy M**	**12/09/2021**

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.
Lake Charles, LA 70615

CASE# **2021-00147277**

INITIAL NARRATIVE

On December 9, 2021, at approximately 1315 hours, I, Sgt. Elliott Phillips was working the front Administration Desk, when a forgery complaint was being reported. The complainant, stated his ex-girlfriend has been threatening him and also opened a large life insurance policy on him. The complainant was advised a report would be done on the incident and Detectives would be in contact with him.

EOR/NFI
Sgt. Elliott Phillips 12808

REPORTING OFFICER	DATE	REVIEWED BY	
Phillips, Elliott	**12/9/2021**	**Dansby, Jeremy M**	**12/09/2021**

Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Office
PO Box 2185, Lake Charles, LA 70602
Legal Division

Calcasieu Parish Sheriff's Office

CASE REPORT

5400 E. Broad St.
Lake Charles, LA 70615

CASE# **2021-00147277**

SUPPLEMENTAL NARRATIVE

On December 9, 2021, at approximately 1315 hours, I, Sgt. Elliott Phillips was working the front Administration Desk, when a forgery complaint was being reported.

Sgt. Phillips, spoke with the complainant, John King, who stated his ex-girlfriend has been threatening him. King, stated his ex-girlfriend, Charmaine Colston has opened a $600,000 life insurance policy in his name. King stated the policy was opened at State Farm and was opened sometime in 2020. King, also stated Colston had transferred a $50,000 policy to her account from his, but State Farm has since corrected that account. King, stated he never signed any policy with State Farm as Colston the beneficiary, and that she forged his signature. King stated he and Colston were together for several years, also had two kids together. King advised Colston has been sending him threatening emails and text messages, stating he was going to kill him. King was very upset by this incident since Colston opened up the life insurance policy and she has been saying she was going to kill him.

King had a prepared statement ready for Detectives, that he would email to the Detective that contacts him. King also had several messages and the policy information that Colston opened up. King was advised a report would be done on the incident and Detectives would be in contact with him.

NOTE: King stated he works out of town a lot, but Detectives could contact him on his cell phone. King also provided his email, johncjking86@gmail.com

EOR/NFI
Sgt. Elliott Phillips 12808

A TRUE COPY
Mary Hanwka
Bureau of Criminal Identification & Records
Calcasieu Parish Sheriff's Department
Lake Charles, LA

REPORTING OFFICER	DATE	REVIEWED BY	
Phillips, Elliott	12/9/2021	Dansby, Jeremy M	12/09/2021

Audio recording

district attorney recording ross murray .m4a

The original recording is embedded in this PDF as a file attachment. Open the Attachments pane in a PDF application that supports embedded files.

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90 Bergen Street Newark, NJ 07103

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Pain Management
Work Injuries
Musculoskeletal Ultrasound
Coccyx Pain Center
Phone: 973-972-2802
Fax: 973-972-2825

WORK RETURN STATEMENT

Today's Date: 9 -- 4 - 2024

To:

~~**Date of Injury:** _____ -- _____ - 201___~~

☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313

☑ The patient's **Supervisor**.

☐ Other (specify):

Patient Name: John King was seen (____ AM/ PM until ____ AM/ PM) today in the Physical Medicine and Rehabilitation department (DOC-3100).
Or: ☐ The patient was seen in the office on the following date: _____ -- _____ - 201___

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ **Return to *FULL* duty on** _____--_____-- 201____.

☐ **MODIFIED duty** starting on _____--_____-- 201___. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:

- ☑ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
- ☐ No overhead activities.
- ☐ Other: Due to low back pain Mr. King is unable to perform climbing activities

☐ **Kept Out-of-Work** from _____--_____-- 201_____ until & including _____--_____-- 201____
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ **After** this date: the patient is then medically **cleared** (as of the following day) to return to:

- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☑ **FOLLOW-UP HERE** is scheduled 11 -- 13 --2024, or in ____ week(s).

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.
If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD | Todd Stitik, MD | Other:
Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

Certificate of Service

From: True King <truekingfile@gmail.com>

To: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Date: Thu, 21 Nov 2024 12:46:06 -0600

Ms Abshire,
Please provide the address and if possible any subpoenas , citations or judgements against Shunte King my wife.

Mr Schrumpf does not represent my wife and she is not a resident of Louisiana and has not received notice of a hearing or had a trial. He says you mentioned a judgement of contempt filing against shunte king. Please provide the date this judgement was filed what address it was served at and exactly what she was charged with as she appeared in person and requested due process and nothing was said while she was in Louisiana.

In order to proceed she needs to know the address served and charges to determine which type of lawyer is necessary to address this matter ethically. Thank You John King
(Note: a case number for the contempt charges is needed and evidence of due process thank you)

On Thu, Nov 7, 2024 at 1:03 PM Monica Abshire <
mabshire@lccitycourt.onmicrosoft.com> wrote:

> Please see attached Affidavit of Transmission.
>
> Monica Abshire
> Clerk of Court
> Lake Charles City Court
> (337) 491-1566
>
> -----Original Message-----
> From: True King <truekingfile@gmail.com>
> Sent: Thursday, November 7, 2024 12:00 PM
> To: True King <truekingfile@gmail.com>
> Cc: KAMIE DOMINIC <kamiedominiclaw@gmail.com>; Monica Abshire <
> mabshire@lccitycourt.onmicrosoft.com>; Kay Bang <kay.bang@lccitycourt.org>
> Subject: 2024.11.04 JKing to KDominic Notice of Subpoena
>
> Ms Abshire, Ms Dominic, Ms Bash, Honorable Judge Richard,
>
> Please find required notice od Subpoena provided electronically to Ms
> Dominic and overnighted to Lake Charles City Clerk,
>
> Regards.
>

Re: Dr Jeevan for John King,

From: Roseville Physical Therapy and Rehabilitation <rosevillephysicaltherapy@gmail.com>

To: True King <truekingfile@gmail.com>

Cc: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, John King <johncjking86@gmail.com>

Date: Wed, 13 Nov 2024 09:51:10 -0500

Fax sent.

On Tue, Nov 12, 2024 at 4:57 PM True King <truekingfile@gmail.com> wrote:

> Hello Ladies,
> Attaching Mr Oliver Schrumpf he’s John’s legal rep and we’re trying to get
> the disability note sent directly to Mr Schrumpf FROM Dr Jeevan Directly.
>
> It’s the same note from yesterday but if you could provide proof it came
> from Dr Jeevan by sending a fax to below. It is time sensitive and if
> possible to be faxed today by deadline or by in the morning that wound be
> awesome
>
> Attachment below .
>
> Oliver “Jackson” Schrumpf
>
> Schrumpf Law Office (PLC)
>
> 3801 Maplewood Drive
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA%C2%A0+70663?entry=gmail&source=g>
>
> Sulphur, LA 70663
> <https://www.google.com/maps/search/3801+Maplewood+Drive+Sulphur,+LA%C2%A0+70663?entry=gmail&source=g>
>
> Phone: 337-625-9077
>
> Fax: 337-625-8231
>
> oschrumpf@schrumpf-law.com
>
>
>

FW: King medical history

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: True King <truekingfile@gmail.com>

Date: Tue, 12 Nov 2024 15:38:29 -0600

Attachments:
Disability medical history.pdf

I will not send this to the Judge since nothing in it says that John cannot travel for trial on November 14.. It will just aggravate him more. If you get anything from the physician saying John cannot travel for a trial on Nov. 14, 2024 please send that.

From: True King <truekingfile@gmail.com>
Sent: Tuesday, November 12, 2024 3:34 PM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>
Subject: King medical history

Mr Schrumpf,

It mentioned previous medical history as grounds for video testimony .

Also as a reminder Dominic may be lying our last attorney Abshire said her additional coverage went up to $50,000.00 this was in addition to her bond her policy was separately maintained . In working to get that from previous attorney.

I’m currently preparing the damages for the cost of car #1, the auto collateral loan against car # 1 which was in amount of $5000.00 I will upload originals from the bank

- I will upload proof that Louisiana law clearly states that the

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WORK RETURN STATEMENT

Today's Date: 11 -- 1 - 2022

To:

Date of Injury: 4 -- 4 - 2022

- ~~☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313~~
- ☑ The patient's **Supervisor**.
- ☐ Other (specify):

Patient Name: KING JOHN was seen (____ AM/ PM until ____ AM/ PM) today in the Physical Medicine and Rehabilitation department (DOC-3100).
Or: ☒ The patient was seen in the office on the following date: 10 - 31 - 2022

WORK STATUS: The patient is medically cleared for the following:

- ☐ **Continue *FULL* duty** work.
- ☐ **Return to *FULL* duty on** ____--____-- 201____.
- ☒ **MODIFIED duty** starting on 10-31-22 until 1-23-22 -- 201___. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:
  - ☐ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
  - ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
  - ☐ No overhead activities.
  - ☒ Other: No crawling, No climbing, or activities that exacerbate ~~tef~~ right elbow pain.
- ☐ **Kept Out-of-Work** from ____--____-- 201____ until & including ____--____-- 201____
  By that date, the work status will then be reevaluated for further work status, unless noted below.
  - ☐ **After** this date: the patient is then medically **cleared** (as of the following day) to return to:
    - ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
    - ☐-Modified duty (if available) with the following restrictions:
    - ☐-Full Duty.

FURTHER EVALUATION:

- ☒ **FOLLOW-UP HERE** is scheduled 1 -- 23 --2022, or in ____ week(s).
- ☐ **DISCHARGED** from my care: No further follow-up is planned here.
- ☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.
If there are any questions please contact ~~the treating~~ physician (who has signed below). Thank you.

Patrick Foye, MD — ~~Todd Stitik, MD~~ — Other:
Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

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WORK RETURN STATEMENT

Today's Date: 4 -- 12 - 2022

To:

Date of Injury: _____ -- _____ - 201___

☐ ~~**Risks & Claims** Office, (Fax 972-2382, Phone 972-0277) ADMC 1313~~

☐ The patient's **Supervisor**. Stephanie Merlorez

☐ Other (specify):

Patient Name: John King was seen (11:30 AM/PM until 12:30 AM/PM) today in the Physical Medicine and Rehabilitation department (DOC-3100).

Or: ☐ The patient was seen in the office on the following date: _____ -- _____ - 201___

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ **Return to *FULL* duty on** _____--_____-- 201___.

☐ **MODIFIED duty** starting on _____--_____-- 201___. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:

- ☐ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
- ☐ No overhead activities.
- ☐ Other:

☑ **Kept Out-of-Work** from 4 - 13 -- 2022 until & including 5 -- 24 -- 2022
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ **After** this date: the patient is then medically **cleared** (as of the following day) to return to:

- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☑ **FOLLOW-UP HERE** is scheduled 5 -- 24 --2022, or in ____ week(s).

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.

If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD — Todd Stitik, MD — Other: _____

Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

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WORK RETURN STATEMENT

Today's Date: 4 -- 10 - 2023

To: King, John C.

Date of Injury: _____ -- _____ - 201___

☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313

☐ The patient's **Supervisor**.

☐ Other (specify):

Patient Name: JOHN C. KING was seen (_____ AM/ PM until ____ AM/ PM) today in the Physical Medicine and Rehabilitation department (DOC-3100).
Or: ☐ The patient was seen in the office on the following date: _____ -- _____ - 201___

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ **Return to *FULL* duty on** _____--_____-- 201____.

☒ **MODIFIED duty** starting on _____--_____-- 201___. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:
- ☐ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
- ☐ No overhead activities.
- ☒ Other: limit patient to ground work with an avoidance of confined spaces, climbing / crawling, heavy lifting, and travel due to patient being on crutches (right ankle fracture) and concurrent right elbow pain that restricts movement.

☐ **Kept Out-of-Work** from _____--_____-- 201_____ until & including _____--_____-- 201____
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ **After** this date: the patient is then medically **cleared** (as of the following day) to return to:
- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☒ **FOLLOW-UP HERE** is scheduled 5 -- 15 --2023, or in ____ week(s).

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.
If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD — Todd Stitik, MD — Other:
Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

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WORK RETURN STATEMENT

Today's Date: 5 -- 15 - 2023

To: King, John C.

Date of Injury: _____ -- _____ - 201___

☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313

☐ The patient's **Supervisor**.

☐ Other (specify):

Patient Name: John C. King was seen (✓ AM/ PM until ___ AM/ PM) today in the Physical Medicine and Rehabilitation department (DOC-3100).
Or: ☐ The patient was seen in the office on the following date: 5 -- 15 - 2023

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ **Return to *FULL* duty on** _____--_____-- 201____.

☒ **MODIFIED duty** starting on 5 -- 15 -- 2023. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:

- ☐ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
- ☐ No overhead activities.
- ☒ Other: Limit patient to ground work with an avoidance of confined spaces, climbing, crawling, heavy lifting, and travel due to patient being on crutches (right ankle fracture) and concurrent right elbow pain that limits movement.

☐ **Kept Out-of-Work** from _____--_____-- 201____ until & including _____--_____-- 201____
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ **After** this date: the patient is then medically **cleared** (as of the following day) to return to:
- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☒ **FOLLOW-UP HERE** is scheduled 8 -- 30 --2023, or in ____ week(s).

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.
If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD — Todd Stitik, MD — Other:
Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

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WORK RETURN STATEMENT

Today's Date: 9 -- 27 - 2023

To: King, John

Date of Injury: _____ -- _____ - 201___

☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313

☐ The patient's **Supervisor**.

☐ Other (specify):

Patient Name: John King was seen (✓ AM/PM until ___ AM/ PM) today in the Physical Medicine and Rehabilitation department (DOC-3100).
Or: ☒ The patient was seen in the office on the following date: 9 -- 27 - 2023

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ **Return to *FULL* duty on** _____--_____-- 201____.

☒ **MODIFIED duty** starting on 9 -- 27 -- 2023. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:

- ☐ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
- ☐ No overhead activities.
- ☒ Other: Limit patient to ground work with an avoidance of confined spaces, climbing, crawling, heavy lifting, and travel due to right ankle fracture that restricts movement.

☐ **Kept Out-of-Work** from _____--_____-- 201_____ until & including _____--_____-- 201____
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ **After** this date: the patient is then medically **cleared** (as of the following day) to return to:
- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☒ **FOLLOW-UP HERE** is scheduled _____--_____--201___, or in ____ week(s).

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.
If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD — Todd Stitik, MD — Other:
Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

Revised 9-16-14

I was unable to open the evidence files you e-mailed to me

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: True King <truekingfile@gmail.com>

Cc: johncjking86@gmail.com, Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

Date: Tue, 12 Nov 2024 09:28:26 -0600

I was unable to open the evidence and discovery files you e-mailed to me. Please send me any documentation you have regarding

1. Purchase of the vehicle

i. How much was paid for it?

ii.
Do you have any of the sales documents showing the cost and date of sale?

iii.
Do you have cancelled checks or other documentation showing the price?

iv.
Do you have mileage or Kelly Blue Book information on the vehicle?

v.
I would like this information to prove that it was worth at least $10,000.

vi.
If not, Can the salesman come to testify Thursday about the value of the car?

2. Was the car insured?

i. Can you provide copies of the insurance showing how much it was insured for?

ii.
Not just an insurance card, but a document showing the value the car was insured for.

3. Will John be coming to the trial or do I need to be setting up a ZOOM connection?

JUDGE RICHARD JUST CALLED while I was writing this e-mail (IN A CONFERENCE CALL WITH MYSELF AND KAMIE DOMINIC) AND CRITICIZED YOUR SENDING OF THE PHYSICAL THERAPIST LETTER TO HIS OFFICE VIA E-MAIL. HE SAID THAT HE

WILL NOT ACCEPT COMMUNICATIONS FROM ONE PARTY. PLEASE DO NOT CALL OR E-MAIL THE COURT DIRECTLY. SEND ALL COMMUNICATIONS TO ME AND I WILL ATTEMPT TO TAKE APPROPRIATE ACTION.

JUDGE RICHARD ALSO SAID THAT HE WILL NOT ACCEPT THE LETTER FROM A PHYSICAL THERAPIST. HE WANTS A *CERTIFIED* LETTER FROM AN *ORTHOPEDIST OR MEDICAL DOCTOR, *by the end of today, or he will expect John King at trial in person Thursday.

Oliver “Jackson” Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

King Medical Note

From: True King <truekingfile@gmail.com>

To: True King <truekingfile@gmail.com>, Oliver Schrumpf <oschrumpf@schrumpf-law.com>, Ron@lccitycourt.org

Date: Mon, 11 Nov 2024 16:07:23 -0500

Attachments:
ROSEVILLE.pdf

Mr Schrumpf,
Medical note attached please be mindful specialist appointment is Nov 13 and today is a holiday.

-JK

ROSEVILLE
PHYSICAL THERAPY

Tel: (973) 268-2250 Fax: (973) 268-2692
RosevillePhysicalTherapy@Gmail.com

11/11/2024

Patient Name: John King

Age: 38

Visit Date: 11/11/2024

Chief Complaint: Annular tear in lumbar spine

Subjective: Patient has restrictions including no flying, no climbing, no sitting for prolonged periods secondary to pain, and no operating heavy machinery.

If you have any questions or concerns please feel free to contact our office at (973) 268-2250.

Dr. Jeevan Mathew PT, DPT

Roseville Physical Therapy

Law Office of Kamie T. Dominic, LLC

Kamie T. Dominic, Attorney at Law

1400 Ryan Street
Lake Charles, LA 70601
Tel: (337) 393-7059
Fax: (337) 426-8763
Email: kamiedominiclaw@gmail.com

November 22, 2024

VIA EMAIL AT OSCHRUMPF@SCHRUMPF-LAW.COM
Oliver "Jackson" Schrumpf
Schrump Law Office (PLC)
3801 Maplewood Drive
Sulphur, LA 70663

RE: *King vs. Amos 23-21214*

Dear Mr. Schrump:

I am writing to inform you that I filed the judgment on November 19, 2024. I sincerely apologies for any oversight on my part, as I was unaware that you wished to sign the judgment prior to its filing.

The clerk of court has confirmed that they will send a certified copy of the judgment directly to you.

If you would prefer, I can amend the judgment to include your signature. Please advise how you would like me to proceed or if there are any additional actions you would prefer.

Thank you for your understanding, and I look forward to your response.

In appreciation, I remain

Kamie T. Dominic

KAMIE T. DOMINIC
ATTORNEY AT LAW

Official Medical Note and Fax Transmission

From: True King <truekingfile@gmail.com>

To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>, True King <truekingfile@gmail.com>

Bcc: Tyria Guillory <msteetax@gmail.com>

Date: Tue, 12 Nov 2024 17:56:30 -0500

Attachments:
IMG_3512.jpeg
IMG_3517.jpeg
IMG_3518.jpeg
IMG_3509.jpeg
IMG_3515.MOV

Note from specialist attached and fax transmissions that were sent earlier to Judge Richard directly from the hospital per the previous orders sent last Friday they faxed without knowing he said today not to fax
Records and fax transmissions below were sent on time to Judge Richard and wet signatures shunte king will bring in person .

Thank You

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WORK RETURN STATEMENT

Today's Date: 11 -- 12 - 2024

To:

Date of Injury: _____ -- _____ - 201___

☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313

☑ The patient's **Supervisor**.

☐ Other (specify):

Patient Name: John King was seen (10 AM/ PM until ____ AM/ PM) today in the Physical Medicine and Rehabilitation department (DOC-3100). 11-11-24

Or: ☐ The patient was seen in the office on the following date: _____ -- _____ - 201___

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ ***Return to FULL duty* on** _____--_____-- 201____.

☐ ***MODIFIED duty*** *starting on* 11 -- 12 -- 2024. (***IF*** modified duty if ***NOT*** available, ***THEN*** the *patient is to be out of work until the follow-up date noted below.*) Use the following restrictions:

- ☑ ***CONTINUE MODIFIED DUTY***, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ *Sedentary (mainly seated) work duties with no lifting more than 10 lbs.*
- ☐ *No overhead activities.*
- ☐ *Other:*

Patient cannot fly, must use walker to stand, cannot walk unassisted, and cannot drive heavy equipment.

☐ **Kept Out-of-Work** from _____--_____-- 201____ until & including _____--_____-- 201____
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ **After** this date: the patient is then medically **cleared** (as of the following day) to return to:
- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☑ **FOLLOW-UP HERE** is scheduled 12 -- 3 --2024, or in ____ week(s). 12/3/24

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.

If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD

Todd Stitik, MD

Other:

RUTGERS
New Jersey Medical School

Physical Medicine and Rehabilitation
University Rehabilitation Associates
New Jersey Medical School
Doctors Office Center, Suite 3100
Rutgers, The State University of New Jersey
90 Bergen Street Newark, NJ 07103

Musculoskeletal Medicine
Pain Management
Work Injuries
Musculoskeletal Ultrasound
Coccyx Pain Center
Phone: 973-972-2802
Fax: 973-972-2825

WORK RETURN STATEMENT

Today's Date: 11 -- 12 - 2024

To:

Date of Injury: _____ -- _____ - 201___

☐ **Risks & Claims** Office, (Fax 972-2382, Phone 972-6277) ADMC 1313

☑ The patient's **Supervisor**.

☐ Other (specify):

Patient Name: John King was seen (10 AM/ PM until ____ AM/ PM) 11-11-24
today in the Physical Medicine and Rehabilitation department (DOC-3100).
Or: ☐ The patient was seen in the office on the following date: _____ -- _____ - 201___

WORK STATUS: The patient is medically cleared for the following:

☐ **Continue *FULL* duty** work.

☐ **Return to *FULL* duty on** _____--_____-- 201____.

☐ **MODIFIED duty** starting on 11 -- 12 -- 2024. (***IF*** modified duty if ***NOT*** available, ***THEN*** the patient is to be *out of work* until the follow-up date noted below.) Use the following restrictions:

- ☑ **CONTINUE MODIFIED DUTY**, (**IF** available, as noted above) with the **SAME** restrictions **as prior** work form.
- ☐ Sedentary (mainly seated) work duties with no lifting more than 10 lbs.
- ☐ No overhead activities.
- ☐ Other:

Patient cannot fly, must use walker to stand, cannot walk unassisted, and cannot drive heavy equipment.

☐ **Kept Out-of-Work** from _____--_____-- 201____ until & including _____--_____-- 201____
By that date, the work status will then be reevaluated for further work status, unless noted below.

☐ **After** this date: the patient is then medically **cleared** (as of the following day) to return to:

- ☐-Modified duty (if available) with the **SAME** restrictions as prior work return form.
- ☐-Modified duty (if available) with the following restrictions:
- ☐-Full Duty.

FURTHER EVALUATION:

☑ **FOLLOW-UP HERE** is scheduled 12 -- 3 -- 2024, or in ____ week(s). 12/3/24

☐ **DISCHARGED** from my care: No further follow-up is planned here.

☐ **TRANSFERRED** to another doctor. No further follow-up is planned here.

Diagnoses: see medical record.
If there are any questions please contact the treating physician (who has signed below). Thank you.

Patrick Foye, MD
Occupational/Musculoskeletal Medicine, Department of Physical Medicine & Rehabilitation.

Todd Stitik, MD

Other: _____

Revised 9-16-14

x x x Communication Result Report (Nov. 12. 2024 5:29PM) x x x

Date/Time: Nov. 12. 2024 5:28PM

File No.	Mode	Destination	Pg(s)	Result	Page Not Sent
6552	Memory TX	913376258231--	P. 2	OK	

Reason for error
E. 1) Hang up or line fail
E. 2) Busy
E. 3) No answer
E. 4) No facsimile connection
E. 5) Exceeded max. E-mail size
E. 6) Destination does not support IP-Fax

RUTGERS
New Jersey Medical School

Physical Medicine and Rehabilitation
Musculoskeletal Medicine
Pain Management
Work Injuries
Musculoskeletal Ultrasound
Coccyx Pain Center

University Rehabilitation Associates
New Jersey Medical School
Rutgers, The State University of New Jersey
90 Bergen Street, D.D.C. Suite 3100
Newark, N.J. 07103-2499
Phone: 973-972-2802. Fax: 973-972-2825

Revised 12-21-18

Fax

DELIVER TO: Richard & Schrump

FAX #: (337) 625 8231

PHONE#: ( )

DATE FAXED: 11-12-24

FROM:
- ☐ - Marisol Rodriguez
- ☒ - Todd P. Stitik, M.D
- ☐ - Patrick Foye, M.D.
- ☐ - Other: _____

OUR PHONE #: (973) 972-2802
OUR FAX #: (973) 972-2825

MESSAGE:
- ☒ - Please see attached.
- ☐ - Other: _____

c/o file # 23-2124

IMPORTANT WARNING: This message is intended for the use of the person or entity to which it is addressed and may contain information that is privileged and confidential, the disclosure of which is governed by applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this information is STRICTLY PROHIBITED. If you have received this message in error, please notify the sender immediately and arrange for the return or destruction of these documents.

☐ - If this box is checked, please FAX a signed receipt to 973-972-2825, with your name, date, time, and # of pages received. Thanks!
☐ - Fax was sent.

CONFIDENTIAL FAX COVER SHEET (If Health Information is attached.)

"Confidential Protected Health Information Enclosed"

Protected Health Care Information is personal and sensitive information related to a person's health care. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Re-disclosure without additional patient consent or as permitted by law is prohibited. Unauthorized re-disclosure or failure to maintain confidentiality could subject you to penalties described in federal and state law.

Saved on Server: K:\DOC\Templates\Word\Email\FAX, Fax Cover Sheet.form 0OC-3102

State of New Jersey

PRESCRIPTION BLANK

UNIVERSITY REHABILITATION ASSOCIATES
TODD P. STITIK, M.D.
90 BERGEN STREET, DOC SUITE 3100
NEWARK, NJ 07103
NPI # 1356361349

(973) 972-2802 TEL.
(973) 972-2825 FAX

LICENSE # 25MA05631100 DEA # BS 3968471

IF PRESCRIPTION IS WRITTEN AT ALTERNATE PRACTICE SITE, CHECK HERE ☐
AND PRINT ALTERNATE ADDRESS AND TELEPHONE NUMBER ON REVERSE SIDE

PATIENT John Laing D.O.B. 4/17/86

ADDRESS DATE 11/14/24

Rx

Vicodin 5/325
#45 (Forty five)
1 p.o. q d - b.i.d p.r.n

SUBSTITUTION PERMISSIBLE DO NOT SUBSTITUTE

DO NOT REFILL

REFILL TIMES

SIGNATURE OF PRESCRIBER

Use a separate form for each controlled substance prescription

THEFT, UNAUTHORIZED POSSESSION AND/OR USE OF THIS FORM INCLUDING ALTERATIONS OR FORGERY, ARE CRIMES PUNIS

Video recording

IMG_3515.MOV

The original recording is embedded in this PDF as a file attachment. Open the Attachments pane in a PDF application that supports embedded files.

JOHN CLIFFORD J KING	:	WARD 3/LAKE CHARLES CITY COURT
VERSUS NO. 2023-2124	:	PARISH OF CALCASIEU
RENEE AMOS NOTARY PUBLIC ID # 29374	:	STATE OF LOUISIANA
FILED: _____	:	_____ DEPUTY CLERK OF COURT

PRE-TRIAL BRIEF

To the Honorable Ron Richard, City Judge: (via e-mail) to kay.bang@lccitycourt.org

This matter is set for trial beginning at 9:00 AM Thursday, November 14, 2024.

FACTS:

John Clifford Joseph King purchased a used 2011 Chevrolet Traverse automobile, VIN# **1GNKRJED5BJ220559,** in his name, for approximately $15,000. Mr. King allowed the vehicle to be used by his former girlfriend (Charmaine Colston) until their bitter breakup; then he had the vehicle parked at his mother's home at 123 Louisiana St., Lake Charles, La. (But Charmaine still had a set of keys.) Mr. King moved to New Jersey for work after Hurricane Laura in 2020. While Mr. King was in New Jersey, he took money from his account and paid off the balance then owing on the vehicle ($8,400.00.) Unknown to him, the vehicle title was mailed to Charmaine Colston's address. On or about September 7, 2021, Charmaine went to a non-attorney Notary, Renee' E. Amos, Notary #29374, and had the title to the vehicle transferred to her name. Renee E. Amos, kept a copy of the driver's license of Charmaine Colston. She did not have an i.d. from John King. But Renee Amos notarized a transfer of the title from John Clifford J King who was not present and had not issued a power of attorney to anyone to sign on his behalf.

Mr. John Clifford J King was not present at the transfer because he was still in New Jersey. His presence in New Jersey will be documented by work records, transit receipts, and bank records showing purchases by him in New Jersey on and around September 7, 2021 as well as testimony of witnesses.

Mr. King filed a complaint with the Calcasieu Parish Sheriff's office and, after they released the file to him, Mr. King filed this action against the Notary who certified he was present and that he allegedly executed the transfer of title on September 7, 2021.

Mr. King will make every effort to be present to testify, but due to a back injury may have to testify via Zoom. Counsel will attempt to set up a Zoom link to be used at trial if the Court is satisfied

that Mr. King cannot make the trip to Louisiana personally. Counsel had filed a motion to continue, but the Court denied this request. The Court has received a letter from Dr. Jeevan Mathew

LAW:

La. R.S. 35: §71. Requirement of bond or insurance; suspension of notarial commissions; renewal of bonds or insurance; penalty

A.(1) Unless otherwise provided by law, the authority of a notary public to exercise any of the functions of a notary public within his jurisdictional limits shall remain in effect, provided that the notary posts and maintains bond, with good and solvent security, in the amount of ten thousand dollars conditioned on the faithful performance of all duties required by law toward all persons who may employ him in his official capacity as notary public, or that the notary maintains a minimum of ten thousand dollars in errors and omissions insurance coverage.

Can a notary be held liable for certifying someone signed in his or her presence when in fact that did not occur? Yes. The most succinct summary of cases is found in a presentation by Cases cited by lawyers from the Taylor Porter firm which may be found at https://legis.la.gov/LegisDocs/CLE/2020/Notarial_Liability_presentation.pdf See Excerpts below:

Collins v. Collins, 629 So.2d 1274 (La. Ct. App. 5th 1993) • Plaintiff had purchased real estate with former wife in 1988 • Plaintiffs alleged that, in March 1989, now ex-wife appeared in notary's office "accompanied by someone purporting to be plaintiff, who forged his signature to an Act of Sale conveying the two Florida lots to purchaser." • "Petitioner alleges that the notary violated his notarial obligations by notarizing the Act of Sale, while he knew or should have known that the person signing as Harvey Collins was not in fact Harvey Collins, and/or the notary should have requested identification from whomever signed as Harvey Collins." **On Exception of no cause of action: "the law is clear that a notary is liable both for deliberate misfeasance in the course of his official duties, and for negligence in performing those duties"**

Levy v. Western Cas. & Surety, 43 So. 2d 291 (La. Ct. App. 2d 1949) • Plaintiff loaned money in exchange for mortgage of certain property. However, the actual party providing the mortgage and obtaining the loan was not the owner of property, but was a grandson of the owner. "Seymour introduced himself to the notary and produced cards from his billfold showing his height, weight, color of eyes and signature. He then introduced one of the ladies who accompanied him as his wife (she was in fact his wife) and the other as 'Mrs. Genie Culpepper, his sister,' who desired to mortgage her property and execute the note with him" – posing as Culpepper was a friend of bad grandson • Question: **was acceptance of introduction from one identified person sufficient? • No- "serious deviation from safe business practices."**

Webb v. Pioneer Bank & Trust Co., 530 So.2d 115 (La. Ct. App. 2d 1988) • Plaintiff began receiving loan payment notices. Upon conducting an investigation, plaintiff learned that her ex-husband had secretly obtained a $40,000 loan in both spouses' names by forging plaintiff's signature. Bank had required signature of spouse for any significant loans, and a notary at the bank had attested to the signature's authenticity. "Parker could not recall whether Mrs. Webb's signature to the note and mortgage was affixed in his presence, although he was the notary." (1981) • **"As the notary, Parker was negligent in failing to exercise ordinary care in ascertaining the genuineness of the signature allegedly affixed in his presence.**

Summers Bros. Inc. v. Brewer., 420 So.2d 197 (La. Ct. App. 1st 1982) • Fraudster went to acquaintances with fabricated business opportunity—a lucrative industrial maintenance contract. Contract was notarized; in reliance on it, plaintiffs paid funds to fraudster to purchase corporate interest, loaned money to fraudster, purchased welding machines, and leased expensive equipment. Notary notarized signatures after the fact Court: Notary's certification absolutely was a "proximate cause" of plaintiffs' financial losses "**A notary is responsible to all persons who have been defrauded of their money as a consequence of their reliance upon the genuineness of any document executed by the notary public while in the performance of his official duties.**" "Even if Mills did not know that the signatures on the contract were forgeries, he knew that by authenticating the document, as notary, he was telling the world that the parties had appeared before him and affixed their signatures in his presence. Thus, he committed fraud in that he purposely let third parties rely on a document purporting to be genuine but actually without validity as an authentic act. The "proof" of validity he supplied was misleading to all who relied on the contract." • Constructive fraud.

McGuire v. Kelly, 2012 WL 602366 (La. Ct. App. 1st 2012) • 3 individuals had jointly purchased an expensive FL beach-house as an investment. After the purchase, one of the owners forged documentation transferring the house from the others to himself. He then did a cash-out refinance by taking a $400k-higher new mortgage on the property. • To obtain sale document, fraudster contacted attorney-notary and asked him to meet at local restaurant and bar. Fraudster was seated with others and then presented bill of sale to notary, who notarized notwithstanding that he had not actually seen other owners sign. • Fraudster admitted deceiving notary "Voss, a notary, signed the acknowledgment clause, indicating that the plaintiffs personally appeared before him and acknowledged their signatures on the quitclaim deed. . . . Regardless of whether Voss was aware of Kelly's scheme and his forgery of the plaintiffs' signatures, Voss knew that his acknowledgment was false. . . . By executing the quitclaim deed and signing the acknowledgment clause, Voss' actions were a deliberate misrepresentation and violated his duties as a notary public."

Damages:

John King believes the original purchase price of the vehicle was $15,000.00 (We will attempt to bring documentation of the original sale if it can be located. Bank records show that a payoff of the vehicle was made for $8,400.00 on April 5, 2021. While waiting on the title to be received, John King paid $200 per month insurance from April through February of the next year (2022), a total of (12 months x $200 = $2,400.00). When John King learned the title had been taken by Charmaine Colston, he cancelled the insurance, (but still had not received the title or transfer documents from the CPSO, so the State of Louisiana cancelled his driver's license and advised it will cost him $850.00 to re-instate the license. Without a driver's license, Mr. King was unable to obtain employment on several jobs. Damages far exceed the Notary's bond amount.

If the Court finds that the Notary executed the document without Mr. King being present on September 6, 2021, the Court should award Judgment in favor or John Clifford

J. King and against the Notary, Renee' E. Amos, and her surety, for the value of the damages (Estimated $15,000.00) or at least for the amount of the Notary's bond ($10,000.00), plus all costs of this proceeding.

By attorney for John Clifford J. King:

OLIVER "JACKSON" SCHRUMPF
SCHRUMPF LAW OFFICE (PLC)
3801 Maplewood Drive
Sulphur, LA. 70663
Telephone 337-625-9077
Facsimile: 337-625-8231
e-mail: oschrumpf@schrumpf-law.com

CERTIFICATE OF SERVICE

This certifies that an exact copy of this Pre-Trial Brief has been served on opposing counsel via e-mail to kamiedominiclaw@gmail.com

Done at Sulphur, La. this 12 th day of November, 2024.

OLIVER "JACKSON" SCHRUMPF

Fwd: Restraining order Calcasieu

From: True King <truekingfile@gmail.com>

To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

Date: Wed, 13 Nov 2024 16:40:52 -0500

Attachments:
Petition and restraining order.pdf

Mr Schrumf,
Official restraining order issued in August 2021 she was served in August 2021 and made reference to this restraining order in her email.

How could I have been in person with her if
1) she emailed me on the night of the 7th sept saying the restraining order didn’t stop her
2) she was served and aware of the restraining order attached

Please advise

JOHN CLIFFORD JOSEPH KING, SR.	:	14TH JUDICIAL DISTRICT COURT
VS. NO. 2021-002773, DIV. A	:	PARISH OF CALCASIEU
CHARMAINE COLSTON	:	STATE OF LOUISIANA
FILED: AUG 13 2021	:	DEPUTY CLERK

ORDER

The foregoing petition, prayer, affidavit, and premises considered:

IT IS ORDERED that the Defendant, CHARMAINE COLSTON, be served with a certified copy of this Petition with notice and citation.

IT IS FURTHER ORDERED that a Temporary Restraining Order is issued herein, without notice and without bond, restraining and enjoining CHARMAINE COLSTON from unnecessarily disturbing, harassing, stalking, or threatening JOHN CLIFFORD JOSEPH KING, SR. in any manner whatsoever, including, but not limited to, telephonic and electronic communications- such as text, email, and social media messaging.

IT IS FURTHER ORDERED that the Defendant, CHARMAINE COLSTON, appear before the Hearing Officer of this Honorable Court on the 4th day of October, 2021, at 9 o'clock A.M and show cause why: Via Zoom with Tom Shea.

A. The parties should not be awarded joint custody of the minor children, with Defendant being designated as the domiciliary parent and Petitioner having reasonable visitation, including the option to exercise additional visitation in Lake Charles during extended school holiday weekends pursuant to the Calcasieu Parish School Calendar and one week for vacation during the summer, all in accordance with the attached suggested Joint Custody Plan;

B. Petitioner should not be ordered to pay child support in an amount consistent with the Louisiana Child Support Guidelines, pursuant to Revised Statute 9:315 et seq.;

C. Petitioner should not be granted permission to claim the children as dependents for State and Federal income tax purposes every year; and

D. A preliminary injunction and, in due course, a permanent injunction, should not be issued enjoining and restraining CHARMAINE COLSTON, and her agents, from unnecessarily disturbing, harassing, stalking, or threatening JOHN CLIFFORD JOSEPH KING, SR. in any manner whatsoever, including, but not limited to, telephonic and electronic communications- such as text, email, and social media messaging.

THUS DONE AND SIGNED this 19th day of August, 2021 at Lake Charles, Louisiana.

JUDGE, 14TH JUDICIAL DISTRICT COURT

W. Mitchell Redd

CAL CLERK-FAMILY COUR
AUG 13 2021 PM3:00:55

CMS7820303
Filing Date: 08/13/2021 02:59 PM
Case Number: 2021-002773
Document Name: ORDER
Page Count: 1

ROSEVILLE
PHYSICAL THERAPY

Tel: (973) 268-2250 Fax: (973) 268-2692
RosevillePhysicalTherapy@Gmail.com

11/11/2024

Patient Name: John King

Age: 38

Visit Date: 11/11/2024

Chief Complaint: Annular tear in lumbar spine

Subjective: Patient has restrictions including no flying, no climbing, no sitting for prolonged periods secondary to pain, and no operating heavy machinery.

If you have any questions or concerns please feel free to contact our office at (973) 268-2250.

Dr. Jeevan Mathew PT, DPT

Roseville Physical Therapy

RE: 23-2124 King vs. Amos

From: Oliver Schrumpf <oschrumpf@schrumpf-law.com>

To: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>

Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

Bcc: truekingfile@gmail.com

Date: Thu, 21 Nov 2024 10:56:27 -0600

Monica, please send the updated court costs itemized statement and I will forward to my client,

Oliver “Jackson” Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

From: Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>
Sent: Thursday, November 21, 2024 10:41 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>
Cc: Kay Bang <kay.bang@lccitycourt.org>
Subject: 23-2124 King vs. Amos

Mr. Schrumpf –

On Nov. 15th per your request I sent to you plaintiff’s Court cost to date - $2011.70.

I just wanted to update you on the additional costs owing of $204.00 due to: 1) a service return that was outstanding; 2) some original filings received from Mr. King from email filings

before you enrolled; 3) Processing of the Court’s Contempt Rule aga Shunte King (service cost on this *is* outstanding); 4) Processing of the formal Judgment.

If you would like a breakdown on these costs I would be very happy to send you a transaction report.

Any questions, please do not hesitate to call me.

Monica Abshire

Clerk of Court

Lake Charles City Court

(337) 491-1566

Schrumpf Law Office

A Professional Law Corporation
3801 Maplewood Drive
Sulphur, Louisiana 70663

Oliver "Jackson" Schrumpf*
Stacy D. Saltzman†

(337) 625-9077
Fax: (337) 625-8231

* Licensed in LA and TEXAS
† Licensed in LA and MISSISSIPPI

December 30, 2024

John King
Via e-mail: truekingfile@gmail.com

Re: Hearing in Court December 30, 2024

Dear Mr. King:

By order of Judge Ron Richard, I appeared at the hearing at 9:00 AM this morning caused by your recent filing (to recuse, vacate, strike, etc.). I objected that the Court has no jurisdiction to take any action other than the actions allowed by La. C.C.P. 2088.

Nevertheless, the Judge rescinded his prior order allowing me to leave court on the contempt matters, saying that I must represent you on the contempt matters and any issues in the Case No. 23-2124; he also rescinded his prior order granting you pauper status (saying your wife was not a "3rd party"). Judge Richard commanded that you and I appear in Court at 9:00 AM on January 15, 2025 to allow him to hear your various motions (to recuse, vacate, strike, etc.) which you filed December 12, 2024, UNLESS YOU WITHDRAW THE MOTIONS before that date. I strongly advise you that withdrawing your motions is the wisest course. The allegations of the motions cast aspersions on the court and its personnel. If you had consulted me before filing these items I would have advised you NOT to file them.

Apparently in some of the e-mails you sent to the Court or to Kay Bang, the court's law clerk, you claimed that the address of Shunte was available on Pacer. The City Court is not a participant in Pacer. The Court has no address for you or Shunte other than the Louisiana Avenue address in Lake Charles. The Court ordered me to provide your address. I informed the Court that the only physical address I have for you is the 123 N. Louisiana Avenue Address in Lake Charles, La. All our communications have been by e-mail or telephone.

The Judge made it clear that you are to cease filing motions with the Court except through your attorney.

The Judge also took issue with the claims that anyone had been killed as a result of loose records of addresses. He claimed you said a murder occurred in Iowa, Louisiana resulting from release of Shunte's address in Iowa. I believe the source of this was information in e-mails to Kay Bang.

PLEASE STOP COMMUNICATING WITH THE COURT AND ITS PESONNEL. YOU ARE DIGGING YOURSELVES INTO A HOLE DEEPER AND DEEPER..

I researched the law regarding pauper status. It does not prohibit a spouse from signing the third party affidavit. But the Judge then said in other e-mails provided to the Court, you claimed you had paid $12,000 in attorneys fees in 2024. The Judge said this was not disclosed in the forms you completed and that had he been aware of this he would likely have denied your pauper status.

Denial of pauper status affects your appeal. Costs must be paid within 25 days of mailing notice.

La. C.C.P. Art. 5183. Affidavits of poverty; documentation; order

A. A person who wishes to exercise the privilege granted in this Chapter shall apply to the court for permission to do so in his first pleading, or in an ex parte written motion if requested later, to which the applicant shall annex the following:

(1) The applicant's affidavit that the applicant is unable to pay the costs of court in advance, or as they accrue, or to furnish security therefor, because of the applicant's poverty and lack of means, accompanied by any supporting documentation.

(2) The affidavit of a third person other than the applicant's attorney that he knows the applicant, knows the applicant's financial condition, and believes that the applicant is unable to pay the costs of court in advance, or as they accrue, or to furnish security therefor.

(3) Repealed by Acts 2023, No. 5, §3.

B.(1) Upon the filing of the completed application and supporting affidavits, the court shall render an order that does one of the following:

(a) Grants the application and allows the applicant to litigate or to continue the litigation without paying the costs in advance.

(b) Denies the application with written reasons for such denial.

(c) Sets the matter for a contradictory hearing.

(2) The submission by the applicant of supporting documentation that the applicant is receiving public assistance benefits or that the applicant's income is less than or equal to one hundred twenty-five percent of the federal poverty level shall create a rebuttable presumption that the applicant is entitled to the privilege granted in this Chapter. If the court finds that the presumption has been rebutted, it shall provide written reasons for its finding.

(3) The court may reconsider its original order granting the application on its own motion at any time in a contradictory hearing.

Amended by Acts 1984, No. 456, §1; Acts 1997, No. 1122, §1, eff. July 14, 1997; Acts 1997, No. 1205, §1; Acts 2021, No. 416, §1; Acts 2023, No. 5, §3.

Art. 2126. Payment of costs

A. The clerk of the trial court, immediately after the order of appeal has been granted, shall estimate the cost of the preparation of the record on appeal, including the fee of the court reporter for preparing the transcript and the filing fee required by the appellate court. The clerk shall send notices of the estimated costs by certified mail to the appellant and by first class mail to the appellee.

B. Within twenty days of the mailing of notice, the appellant shall pay the amount of the estimated costs to the clerk. The trial court may grant one extension of the period for paying the amount of the estimated costs for not more than an additional twenty days upon written motion showing good cause for the extension.

C. The appellant may question the excessiveness of the estimated costs by filing a written application for reduction in the trial court within the first twenty-day time limit, and the trial court may order reduction of the estimate upon proper showing. If an application for reduction has been timely filed, the appellant shall have twenty days to pay the costs beginning from the date of the action by the trial court on application for reduction.

D. After the preparation of the record on appeal has been completed, the clerk of the trial court shall, as the situation may require, either refund to the appellant the difference between the estimated costs and the actual costs if the estimated costs exceed the actual costs, or send a notice by certified mail to the appellant of the amount of additional costs due, if the actual costs exceed the estimated costs. If the payment of additional costs is required, the appellant shall pay the amount of additional costs within twenty days of the mailing of the notice.

E. If the appellant fails to pay the estimated costs, or the difference between the estimated costs and the actual costs, within the time specified, the trial judge, on his own motion or upon motion by the clerk or by any party, and after a hearing, shall:

(1) Enter a formal order of dismissal on the grounds of abandonment; or

(2) Grant a ten day period within which costs must be paid in full, in default of which the appeal is dismissed as abandoned.

F. If the appellant pays the costs required by this Article, the appeal may not be dismissed because of the passage of the return day without an extension being obtained or because of an untimely lodging of the record on appeal.

Amended by Acts 1976, No. 708, §2; Acts 1977, No. 198, §2, eff. Jan. 1, 1978; Acts 1978, No. 449, §1, eff. Jan. 1, 1979; Acts 1984, No. 937, §1; Acts 1995, No. 105, §1.

As to the revocation of pauper status, and appointing me to represent you in your contempt matters, I am willing to seek writs to the Third Circuit Court of Appeal to counter this. If you want me to do that I will need your authorization by Thursday, January 2, 2025.

Regardless, it appears the Judge wants you (and Shunte) in his Court January 15 and 22, 2025 to answer to contempt rules. I have multiple times advised you that I do not consider myself to be expert at criminal defense and you should consult an attorney proficient in criminal matters to defend the contempt matters. Regardless of who you use, you will need to have EVIDENCE of the claims you have made in these various filings. (Or immediately file a Motion to withdraw these motions). If I am to be your attorney on January 15, 2025, please forward all evidence of each allegation made in those pleadings without delay, so I may review and advise of my recommendations.

Respectfully,

Oliver Schrumpf

Oliver "Jackson" Schrumpf

OJS/

Re: Motion to Continue has been denied. Trial is November 14, 2024

1 message

True King <truekingfile@gmail.com> Fri, Nov 8, 2024 at 7:24 AM
To: Oliver Schrumpf <oschrumpf@schrumpf-law.com>
Cc: Jinnifer LeBlanc <jleblanc@schrumpf-law.com>, Dawn Brown <dbrown@schrumpf-law.com>, Taye King <kingshunte@gmail.com>

GM
Thank you for enrolling Mr Schrumpf Ms Jinnifer was right when she said you are an actual litigator who knows and practices the law and Im grateful.
My wifes name is Shunte King, she is attached to this email as Kingshunte@gmail.com the household accounts we use are in her name.

My wife will be coming on Wednesday in person to defend me. If I have to be rolled in with medical assistance Im doing everything in my power to come but Im going to be clear Im going to be in excruciating pain and unable to walk unassisted or stand unassisted but I will have to add this to my damages as without us there in person the evidence will not hold. That s what theyre tring to achieve and attempting to scare my wife away from testifying but she will stand by me so that this abuse ends. Weve been living in hell for 4,5 years nonstop and the covering up and bullying has to stop.

After prayer and discussion my wife and brother will be showing up as witnesses as well as my brother but please dont tell Judge Richard she is coming because she was submitted as a witness during discovery. After reviewing this email and proving our innocence I can also show you confidential emails between attorneys that highlight that ex parte communication is happening and that unfortunately Judge Richards claims are identical to what is evidenced in writing. I only ask that you do not share the names of the attorneys supplying the information as one of them went too far in writing and told everything and we dont even know what to do with evidence that is this bold. I would prefer to attach it without your assistants and allow you to decide whether to share it.
I am innocent. My wife is innocent. We have the emails to prove it. But are not sure we want to provide proof against people who are acting unethically for fear of retaliation.

Every word of the petitions are true and the bullying has occurred in writing Judge Richard just doesnt know we have the evidence.

Click the attachment for all of the information to the actual "imposter" who is practicing law Im pretty sure it will be amusing to see the truth.
See attached

On Thu, Nov 7, 2024 at 6:12 PM True King <truekingfile@gmail.com> wrote:
>
> Mr Schrumpf,
>
> As you can tell from the evidence no one is practicing law. When a plaintiff doesn’t have money their own motions must be filed.
>
> When those motions aren’t filed they punish you.
>

> This case was reset multiple times due to opposing counsel.
>
> Additionally Shunte King is NOT a resident of Louisiana and cannot practice law.
>
> These claims would need to be supported by evidence . Someone in the clerks office is friends with Renee Amos.
> As you can tell by the motions an effort was made to screw John king over with tricks . None of this has anything to do with the case except when someone is ill their caretaker must respond.
>
> Per the medical report John King Sr is suffering from cognitive dysfunction and they were attempting to force him to board a plane on a torn spinal cord or have default sanctions. Therefore motions had to be filed.
>
> They can make allegations but freelance.com receipts of paralegal preparation say otherwise as well as numerous other attorneys who have in writing said the clerk and the judge's paralegal have threatened multiple times.
>
> Mr Schrumpf we were told you were experienced and cannot be told about the law because you know the law. The evidence in this case shows efforts to "free" Ms Amos from liability than indemnifying John King.
>
> Additionally it is prejudicial for them to assume if one spouse is educated they wouldn't proof read documents for the other who struggles.
>
> What's the real underlying issue because that's what we're trying to show you.
>
> Please advise opportunity to get on a call.
>
> Thank You
>
>
>
>
> On Thu, Nov 7, 2024 at 5:58 PM Oliver Schrumpf <oschrumpf@schrumpf-law.com> wrote:
>>
>> I just got back from about a two hour hearing. Judge Ron Richard had counsel for both parties come to court about 1:30 today. He signed my motion to enroll as counsel, but before taking up the motion to continue, he insisted on reading through multiple e-mails, motions, and requests, and complaints which he believes were written by Mrs. King (Shaunte King) and e-mailed from truekingfile@gmail.com
>>
>>
>>
>> Judge Richard said he will consider allowing Mr. King to testify via ZOOM ONLY IF THE COURT RECEIVES A LETTER SIGNED BY A PHYSICIAN BY MONDAY NOVEMBER 11 (A COURT HOLIDAY) SO WE SHOULD TRY TO GET IT TOMORROW IF POSSIBLE) THE LETTER FROM THE PHYSICIAN NEEDS TO SAY THAT HE IS TREATING MR. JOHN C. KING, WHAT MR.KING'S CONDITION IS, AND THAT MR. KING IS PROHIBITED FROM TRAVELLING BECAUSE OF SEVERE RISK OF PERMANENT INJURY (OR WHATEVER OTHER REASON THE DOCTOR HAS FOR PROHIBITING TRAVEL FROM NEW JERSEY TO LOUISIANA). IT MUST BE SIGNED BY THE DOCTOR AND DATED. OTHERWISE, IF MR. KING DOES NOT APPEAR IN COURT NOVEMBER 14, 2024, THE TRIAL (WHICH HAS BEEN SET FOUR TIMES) WILL GO FORWARD.
>>
>>
>>
>>
>>
>> Also, the judge believes that Shaunte King has violated La. R.S. 37:212 (Practicing Law without a license):
>>
>> La. R.S. §212. "Practice of law" defined
>>
>> A. The practice of law means and includes:
>>
>> (1) In a representative capacity, the appearance as an advocate, or the drawing of papers, pleadings or documents, or the performance of any act in connection with pending or prospective proceedings before any court of record in this state; or
>>
>> (2) For a consideration, reward, or pecuniary benefit, present or anticipated, direct or indirect;
>>
>> (a) The advising or counseling of another as to secular law;
>>

>> (b) In behalf of another, the drawing or procuring, or the assisting in the drawing or procuring of a paper, document, or instrument affecting or relating to secular rights;
>>
>> (c) The doing of any act, in behalf of another, tending to obtain or secure for the other the prevention or the redress of a wrong or the enforcement or establishment of a right; or
>>
>> (d) Certifying or giving opinions, or rendering a title opinion as a basis of any title insurance report or title insurance policy as provided in R.S. 22:512(17), as it relates to title to immovable property or any interest therein or as to the rank or priority or validity of a lien, privilege or mortgage as well as the preparation of acts of sale, mortgages, credit sales or any acts or other documents passing titles to or encumbering immovable property.
>>
>> B. Nothing in this Section prohibits any person from attending to and caring for his own business, claims, or demands; or from preparing abstracts of title; or from insuring titles to property, movable or immovable, or an interest therein, or a privilege and encumbrance thereon, but every title insurance contract relating to immovable property must be based upon the certification or opinion of a licensed Louisiana attorney authorized to engage in the practice of law. Nothing in this Section prohibits any person from performing, as a notary public, any act necessary or incidental to the exercise of the powers and functions of the office of notary public, as those powers are delineated in Louisiana Revised Statutes of 1950, Title 35, Section 1, et seq.
>>
>> C. Nothing in this Section shall prohibit any partnership, corporation, or other legal entity from asserting or defending any claim, not exceeding five thousand dollars, on its own behalf in the courts of limited jurisdiction or on its own behalf through a duly authorized partner, shareholder, officer, employee, or duly authorized agent or representative. No partnership, corporation, or other entity may assert any claim on behalf of another entity or any claim assigned to it.
>>
>> D. Nothing in Article V, Section 24, of the Constitution of Louisiana or this Section shall prohibit justices or judges from performing all acts necessary or incumbent to the authorized exercise of duties as judge advocates or legal officers.
>>
>> Amended by Acts 1976, No. 515, §1; Acts 1980, No. 161, §1; Acts 1981, No. 535, §1; Acts 1985, No. 783, §1; Acts 1989, No. 22, §1, eff. June 14, 1989; Acts 1992, No. 673, §1; Acts 2010, No. 24, §1; Acts 2011, No. 325, §2, eff. Jan. 1, 2012.
>>
>>
>>
>> As a result of this, Judge Richard ordered that Shaunte King appear in his Court November 14, 2024 at 9:00 AM. I advised the Court that I represent John C. King, not Mrs. King, but he said Shaunte King has been filing papers in this court and acting as an attorney and she must appear in person or he will hold her in contempt and may refer the case to the District Attorney for prosecution.
>>
>>
>>
>>
>>
>> ALSO, Judge Richard read into the record numerous documents from truekingfile@gmail.com asserting unethical and criminal conduct by Judge Richard and/or his staff members. He intends to have you defend a contempt of Court charge.
>>
>>
>>
>> Again, I advised the Court that I was retained only to represent John C. King on the claim for the Notary bond and I do not represent Shaunte King.
>>
>>
>>
>> 1. Please attempt to get the treating physician to execute a letter SIGNED BY A PHYSICIAN BY MONDAY NOVEMBER 11 (A court holiday- so we should try to get it tomorrow if possible) THE LETTER FROM THE PHYSICIAN NEEDS TO SAY THAT HE IS TREATING MR. JOHN C. KING, WHAT MR.KING'S CONDITION IS, AND THAT MR. KING IS PROHIBITED FROM TRAVELLING from New Jersey to Louisiana until (Date) BECAUSE OF SEVERE RISK OF PERMANENT INJURY (OR WHATEVER OTHER REASON THE DOCTOR HAS FOR PROHIBITING TRAVEL FROM NEW JERSEY TO LOUISIANA). IT MUST BE SIGNED BY THE DOCTOR AND DATED. IT MUST BE RECEIVED BY ME SO I CAN GET IT TO THE JUDGE FIRST THING TUESDAY MORNING.
>>
>> 2. Please advise if Shaunte King will plan to be here Thursday November 14 for trial.
>>
>> 3. Please advise what accommodations you have to testify via ZOOM if we can get the doctor's letter in time.
>>

>>
>>
>> Oliver “Jackson” Schrumpf
>>
>> Schrumpf Law Office (PLC)
>>
>> 3801 Maplewood Drive
>>
>> Sulphur, LA 70663
>>
>> Phone: 337-625-9077
>>
>> Fax: 337-625-8231
>>
>> oschrumpf@schrumpf-law.com
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Chat GPTDocumentation and Paralegal.pdf
4121K

Case # 23-2124
King Vs Amos Hartford

Exhibits to accompany judicial filings
Please refer to case law in motions

EXHIBITS 1: DENIAL OF RIGHT TO FAIR COUNSEL IN JUDICIAL PROCEEDINGS KAMIE DOMINIC MOTIONS ALLOWED TO CIRCUMVENT DUE PROCESS TO DISCOURAGE ENROLLMENT BY QUALIFIED COUNSEL IN TIME AS HER MOTIONS WERE NOT FILED AND SERVED SAME DAY MOTION TO QUASH AND STRIKE WAS FILED BUT NO STATUS CONFERENCE ABOUT THE CONCERNS

Correspondence from 4 of 7 Attorneys, 6 in total have had contact with the Clerk's office but when Shunte King POA / spouse John King Sr Spoke with Ms Monica Abshire on Monday Nov 4, 2024 after the legal holiday on Friday Nov 1 Ms Abshire told Shunte King that the clerk's office had had zero contact with any attorneys about the nature of the case of Judge Richards mood concerning the case but attached are 4 different Louisiana attorneys correspondence all stating the same sentiment and one attorney whose correspondence has not been provided for fear of retribution by Judge Richard it is emphasized that Judge Redd STRONGLY wants Renee Amos not to suffer damages of any sort as ‘she does not have a pot to piss in”; and there have been off record ex parte communications coming from the someone in the clerk's office who another attorney in writing has warned to get an attorney because the case appears to be heavily biased and there is resistance to cooperation within the clerk's office. In an urgent conversation with Ms Bash Judge Richards paralegal she asked Shunte King “are you implying that the clerk's office is dissuading counsel from enrolling on your case and that ex parte communication is taking place” ? When Shunte King responded “No I'm simply relying what the attorneys are saying . Ms Bash then said “I don't believe that at all King has had plenty of time to enroll counsel” then Shunte King told bash there was evidence of multiple attorneys complaining that the clerk's office was creating hurdles to enrollment by saying it would be a long time to send the case file then offering personal expressions on behalf of Judge Redds mood and sentiment. This would be a violation of King civil rights, and any order placing King in medical danger once Richard is made aware there would be grounds for medical injunction by the state of new jersey to prevent orders to move an unreleased patient out of state documented with heightened risk for stroke, permanent paralysis or death from seizure as documented in the hospital inpatient records King currently suffers from seizures as a result of a fall and is experiencing rehabilitation treatments daily until November 13 2024 to coerce spinal cord back into spinal cavity. The extent of the disease's damage was reassessed Nov 5 and MRI results have not come back. The plaintiff is proceeding assuming that Judge Richard will intervene to stop this once the Judge is aware.

23-2124 John C. J. King Sr. vs. Renee Amos

Monica Abshire <mabshire@lccitycourt.onmicrosoft.com> Tue, Aug 13, 10:48 AM
to me

Good Morning Mr. King –

This is to inform you Judge Richard has granted your Pauper Affidavit.
You will be allowed from this date, August 13, 2024 to file in Pauper status, waiving any deposits required, but not relieving you of costs.

Thank you,

Monica Abshire
Clerk of Court
Lake Charles City Court
(337) 491-1566

True King <truekingfile@gmail.com> Wed, Oct 23, 12:22 PM
to shantell, Monica, bcc: me, bcc: Tyria

Monica
Thank you for the update.

Attached is Shantell from our attorneys office.
We're in need of some things that are not clear and hope that you could help Shantell.

Shantell,
This is Ms Abshire the Lake Charles City Court Clerk. She may be able to answer your questions.

Whitney Triplet <whitney@rouzanlaw.com> Thu, Aug 1, 4:06 PM
to me

Good afternoon,

I've finally made it back into the office, and I looked again through what you've sent. The car case is missing documentation of orders that you told me exist. Specifically, the motion to reconsider that she filed should have a signed judgment issued by the judge, and I don't know what else may be out there that she has secretly filed.

In order to proceed at a by the hour billing, this firm requires a $10,000 retainer that my boss requires to be paid prior to any work that is not on a contingency.

Again, I really would like to take this on for you; but there is too much information and background things that have happened that are unknown to me. Once you are able to gather and confirm all pleadings and judgments that have been filed and stamped by the clerk, then we can revisit this. In the meantime, if you decide to handle this pro se, (and this is my personal opinion, not legal advice) your next step may want to be to deliver to the opposing counsel some interrogatories where you are asking specific questions about the incident. You should send them to Ms. Amos through her attorney. You could copy the format of the questions she sent you. Be very specific with your questions. Also make sure to send some to the insurance so they see you are serious about pursuing this.

At this time, that is the most that I can do to assist you. There are just too many gaps in the information available to me.

Whitney Simone Triplet
Attorney at Law
Don A. Rouzan & Associates, L.L.C.
Mailing Address:
P.O. Box 871687
New Orleans, LA 70187-1687
Physical Address:

-

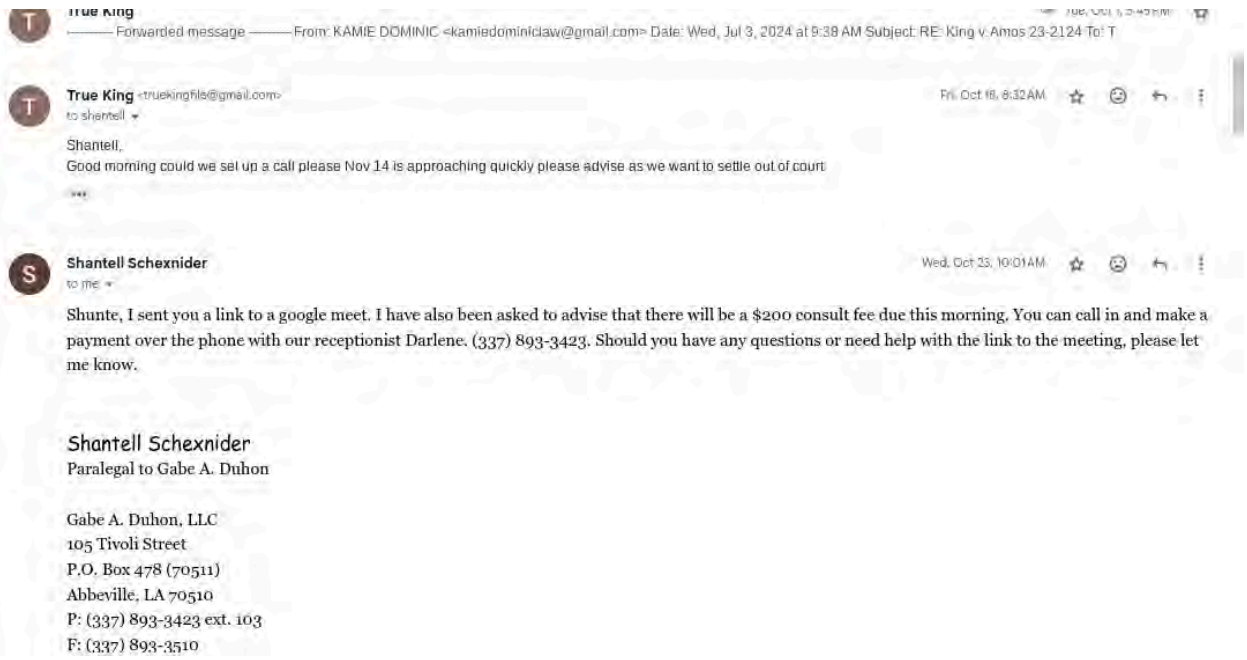
**

True King Oct 23, 2024, 10:28 AM
Hello Shantel,Where is the link I just saw this email.

Shantell Schexnider Oct 23, 2024, 10:30 AM
https://meet.google.com/kau-eoqx-hyb From: True King <truekingfile@gmail.com> Sent: Wednesday, October 23, 2024 2:28 PM To: Shantell Schexnider <shantell@vermil

True King <truekingfile@gmail.com> Oct 23, 2024, 10:33 AM
to Shantell

**



True King
---------- Forwarded message ---------- From: KAMIE DOMINIC <kamiedominiclaw@gmail.com> Date: Wed, Jul 3, 2024 at 9:38 AM Subject: RE: King v. Amos 23-2124 To: T

True King <truekingfile@gmail.com> Fri, Oct 18, 8:32 AM
to shantell

Shantell,
Good morning could we set up a call please Nov 14 is approaching quickly please advise as we want to settle out of court

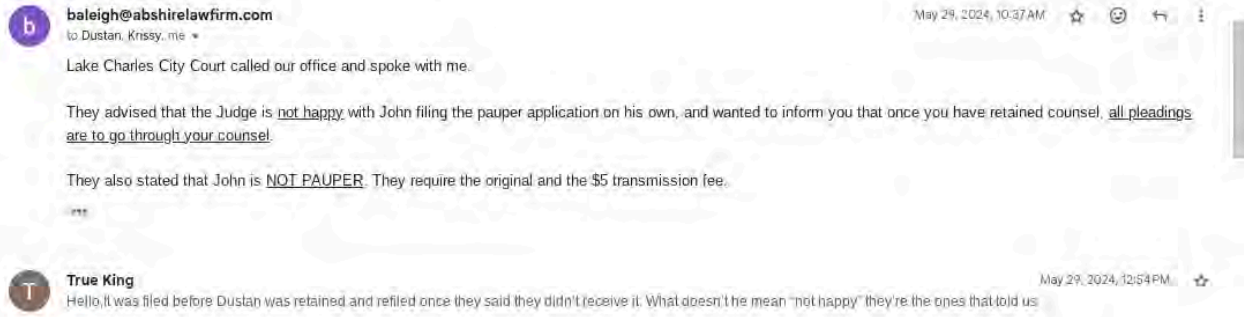
Shantell Schexnider Wed, Oct 23, 10:01 AM
to me

Shunte, I sent you a link to a google meet. I have also been asked to advise that there will be a $200 consult fee due this morning. You can call in and make a payment over the phone with our receptionist Darlene. (337) 893-3423. Should you have any questions or need help with the link to the meeting, please let me know.

Shantell Schexnider
Paralegal to Gabe A. Duhon

Gabe A. Duhon, LLC
105 Tivoli Street
P.O. Box 478 (70511)
Abbeville, LA 70510
P: (337) 893-3423 ext. 103
F: (337) 893-3510

**



baleigh@abshirelawfirm.com May 29, 2024, 10:37 AM
to Dustan, Krissy, me

Lake Charles City Court called our office and spoke with me.

They advised that the Judge is not happy with John filing the pauper application on his own, and wanted to inform you that once you have retained counsel, all pleadings are to go through your counsel.

They also stated that John is NOT PAUPER. They require the original and the $5 transmission fee.

True King May 29, 2024, 12:54 PM
Hello,It was filed before Dustan was retained and refiled once they said they didn't receive it. What doesn't he mean "not happy" they're the ones that told us

***



Joseph Burke Nov 1, 2024, 11:22 AM (5 days ago)
to me, Chelsea, Hannah

Mrs. King,

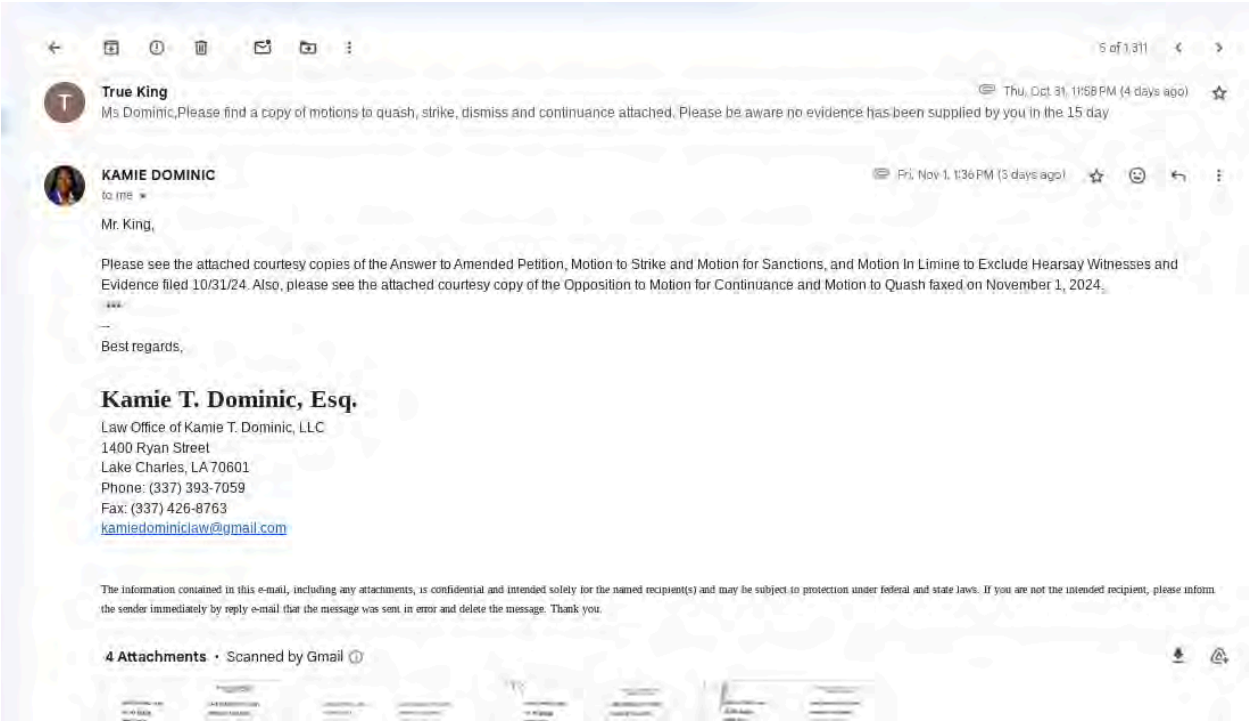
I was simply relaying the docket information provided to me from the court's clerk. I do now know what the subject of the motion or sanctions is.

Thanks,

Joe
Sent from my iPhone

> On Oct 31, 2024, at 1:14 PM, True King <truekingfile@gmail.com> wrote:

***



5 of 1,311

True King Thu, Oct 31, 11:58 PM (4 days ago)

Ms Dominic,Please find a copy of motions to quash, strike, dismiss and continuance attached. Please be aware no evidence has been supplied by you in the 15 day

KAMIE DOMINIC Fri, Nov 1, 1:36 PM (3 days ago)

to me

Mr. King,

Please see the attached courtesy copies of the Answer to Amended Petition, Motion to Strike and Motion for Sanctions, and Motion In Limine to Exclude Hearsay Witnesses and Evidence filed 10/31/24. Also, please see the attached courtesy copy of the Opposition to Motion for Continuance and Motion to Quash faxed on November 1, 2024.

Best regards,

Kamie T. Dominic, Esq.
Law Office of Kamie T. Dominic, LLC
1400 Ryan Street
Lake Charles, LA 70601
Phone: (337) 393-7059
Fax: (337) 426-8763
kamiedominiclaw@gmail.com

The information contained in this e-mail, including any attachments, is confidential and intended solely for the named recipient(s) and may be subject to protection under federal and state laws. If you are not the intended recipient, please inform the sender immediately by reply e-mail that the message was sent in error and delete the message. Thank you.

4 Attachments · Scanned by Gmail

*** Medical Exhibits sent to Judge Richard and Kamie Dominic on Monday Nov 4, 2024 with request to be sealed.***

EXHIBITS SECTION #2 HARASSMENT OF COLSTON AND HER ATTORNEY ATTEMPTS AT UNETHICAL INVOLVEMENT IN COURT PROCEEDINGS AND UNDOCUMENTED ATTENDANCE AT CLOSED COURT HEARING FOR CASE #23-2124

Mail weekly sent to my mothers house. She goes to the post office and mails things to keep my mother and grandmother sick.
Charmaine does not recognize this behavior as insane or inappropriate seeing as though my wife has never met my children and has never even had a conversation with charmaine. This is years later after stealing the car and she does this and brags that there won't be justice for me or a punishment for her.

This is sick. This isn't a paramour, this is a mentally disturbed individual and Ms Dominic should remain ethical when dealing with victims. I hadn't seen Charmaine colston in person in 13 months at the time of car theft so how is that a paramour? I was married and living with my wife. It's more lies this is the harassment contributing to my seizures and paralysis and to discriminate against my gender is unethical and slander.



lies

Tyria's comment on your post

Tyria Guillory
I don't agree with him on make it work that is not good for a women or man that only wants control and not have a relationship for the kids. My nephew stayed with his kids mother regardless to the mental and physical abuse that he was hiding from his family. She cut him, burned him, she it him in the head with an object that left him with seizures. you have to do what is best for you, especially i... See more

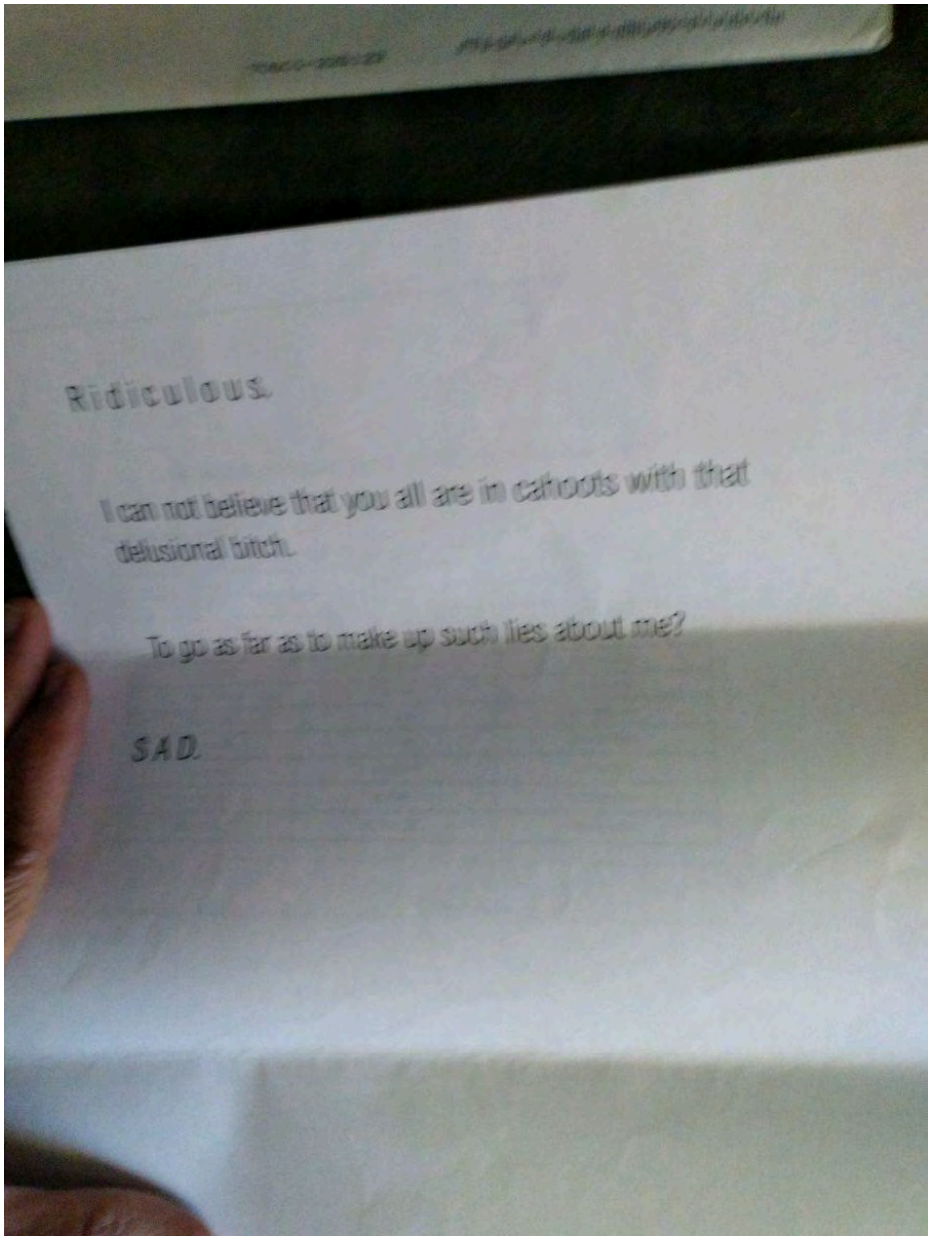
7h Like Reply 1

King Tay
Tyria Guillory I would settle for just keeping my photos, name, my likeness , my husbands god baby photos, shoot just don't post anyone that isn't posting you.

Or you will be subpoenaed to court if you deal with them and lose money off work...
-OR you will be accused of harassment. She gonna initiate every text, email, and mail stuff to your house "good morning ALL", as if you got a wedding ring t... See more

33m Like Reply


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-226123

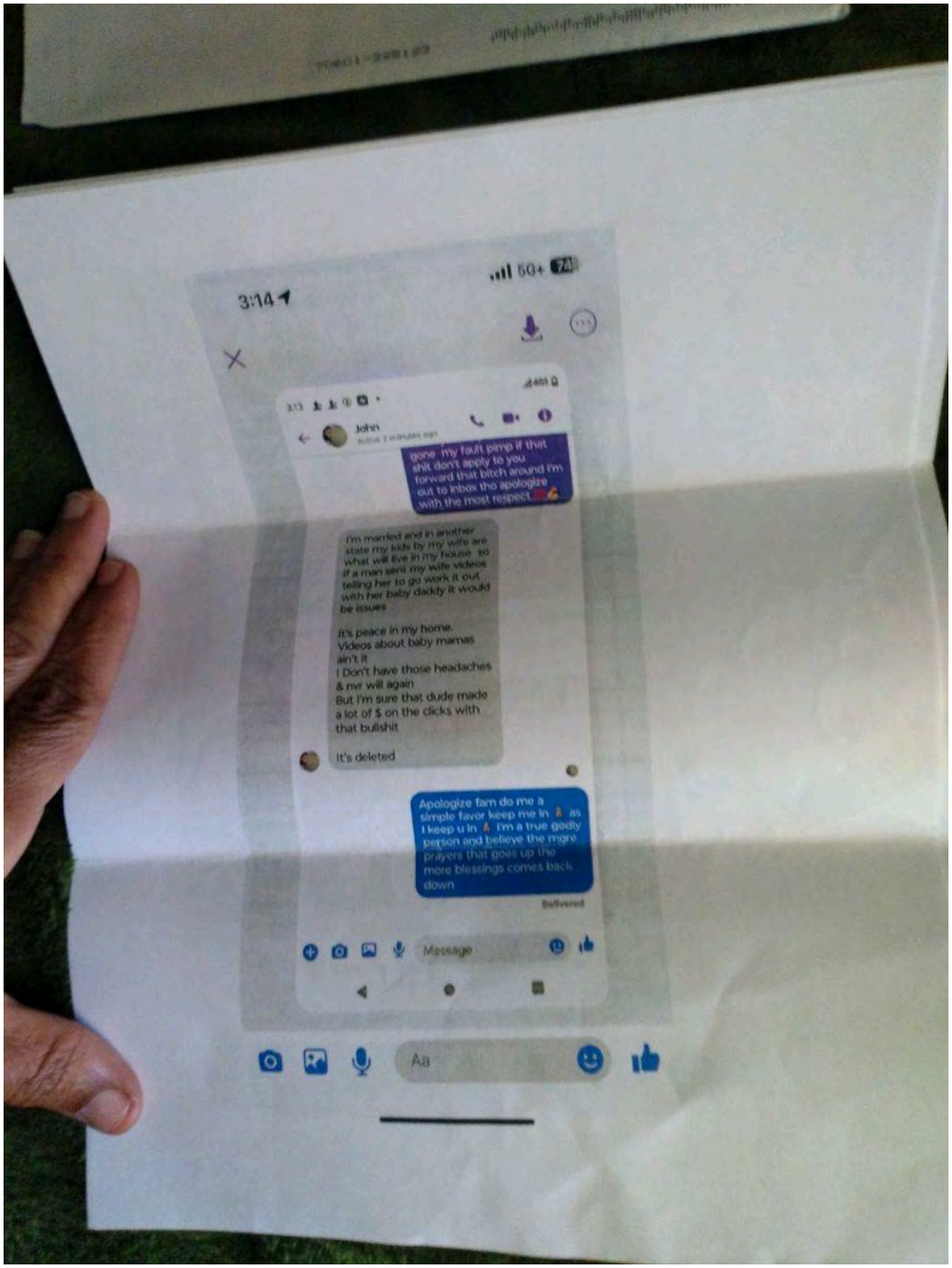


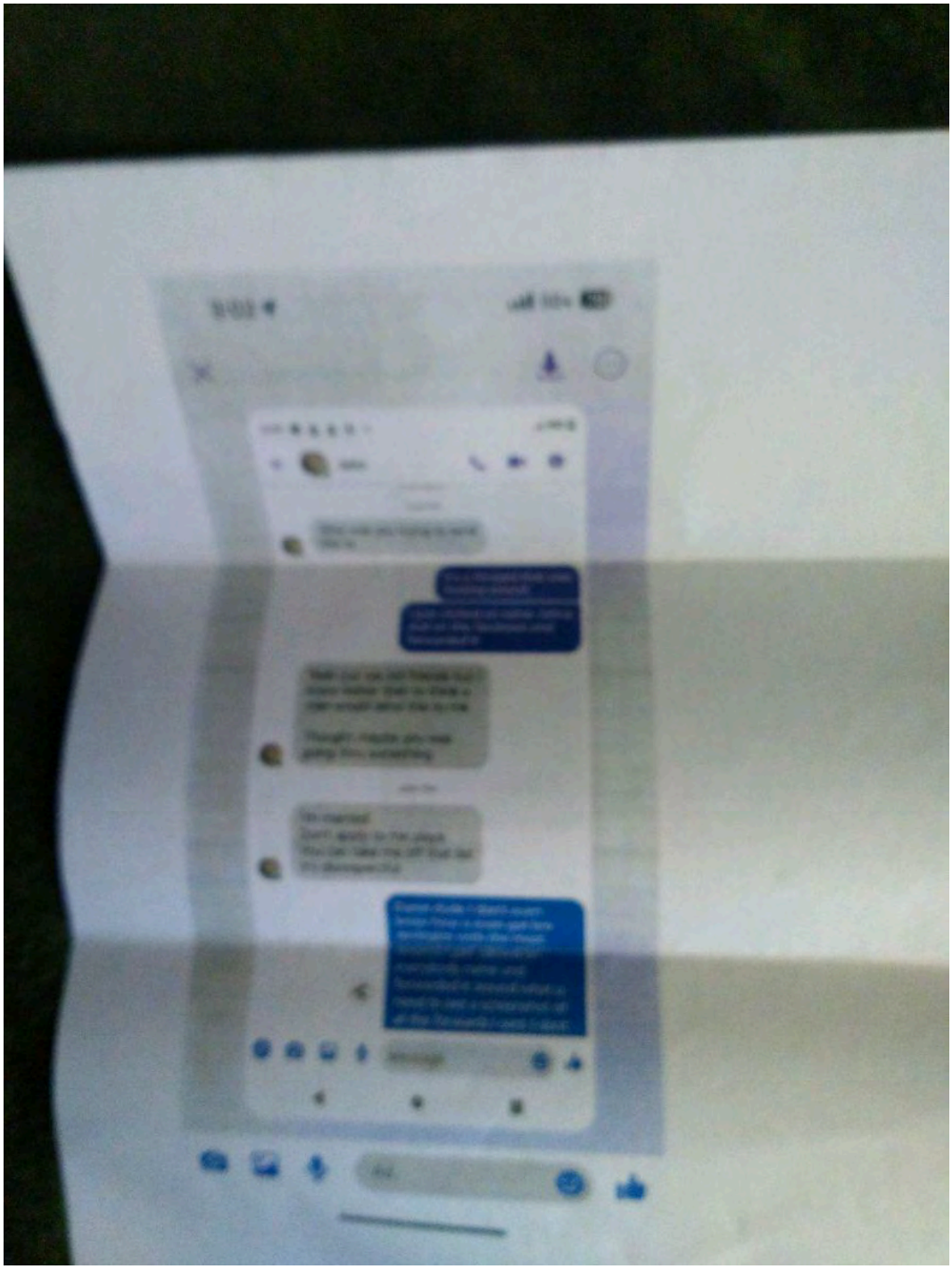
Ridiculous.

I can not believe that you all are in cahoots with that delusional bitch.

To go as far as to make up such lies about me?

SAD.

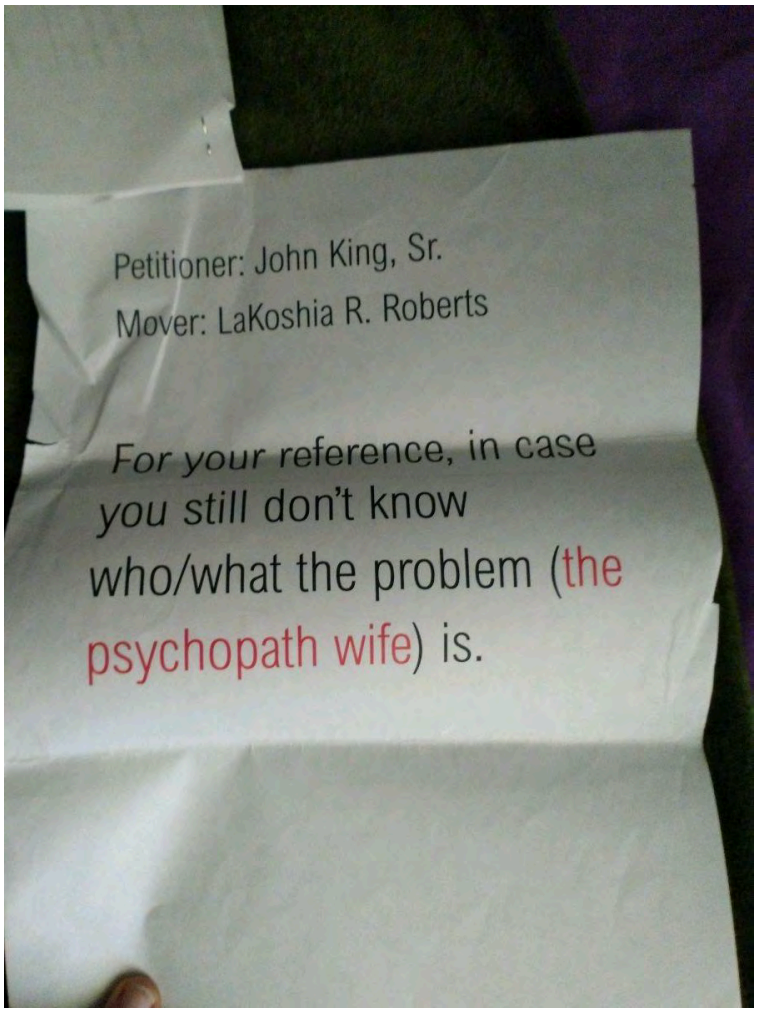

3:14
5G+
John
gone my fault pimp if that shit don't apply to you forward that bitch around I'm out to inbox tho apologize with the most respect
I'm married and in another state my kids by my wife are what will live in my house so if a man sent my wife videos telling her to go work it out with her baby daddy it would be issues
It's peace in my home. Videos about baby mamas ain't it
I Don't have those headaches & nvr will again
But I'm sure that dude made a lot of $ on the clicks with that bullshit
It's deleted
Apologize fam do me a simple favor keep me in 🙏 as I keep u in 🙏 I'm a true godly person and believe the more prayers that goes up the more blessings comes back down
Delivered
Message
Aa




King
921 Moss St.
Lake Charles, La 70601
BATON ROUGE LA 707
19 JUL 2024 PM 1 L
FREEDOM
Monica Guillory King
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123


King
821 Moss St.
Lake Charles, LA 70601
BATON ROUGE LA 707
7 AUG 2024 PM 3 L
FREEDOM
Monica King Guillory
123 N. Louisiana Ave.
Lake Charles, La 70601
70601-225123




Petitioner: John King, Sr.
Mover: LaKoshia R. Roberts
For your reference, in case you still don't know who/what the problem (the psychopath wife) is.


BATON ROUGE LA 707
19 JUL 2024 PM 1 L
King
621 Moss St.
Lake Charles, La 70601
Monica Guillory King
123 N. Louisiana Ave
Lake Charles, La 70601
70601-225123

Tuesday, November 19, 2024

CITY COURT
City of Lake Charles, Louisiana

P.O. Box 1664
Lake Charles, Louisiana 70602
(337) 491-1564

Hearing NOTICE

Plaintiff **KING, JOHN CLIFFORD J**

ATTN: OLIVER JACKSON SCHRUMPF
3801 MAPLEWOOD DRIVE
SULPHUR, LA 70663

JOHN CLIFFORD J KING

VS SuitNo: **23-2124**

RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374

Contempt of Court on Shunte King

Please be advised that the above numbered and entitled cause has been fixed for **Hearing** at **9:00 AM** on **Wednesday, January 22, 2025**, in the City Court Building located at **118 West Mill Street, Lake Charles, La.**

Should you need witnesses, please furnish us with the name and addresses at least 1 (one week in advance of the trial date. We require advance deposit to cover service and witness fees

If you have any type of audio/visual presentation, please contact our office at (337) 491-1564 to set up or got to www.lccitycourt.org for instructions.

Clerk

RECD LC CITY COURT CIV
'24 NOV 15 PM 3:38

JOHN CLIFFORD J KING	:	LAKE CHARLES CITY COURT
VS. NO. 23-2124	:	WARD 3, CALCASIEU PARISH
RENEE AMOS NOTARY PUBLIC ID# 29374	:	STATE OF LOUISIANA
FILED: 11-15-2024	:	M Clerk ~~DEPUTY~~ CLERK OF COURT

RULE TO SHOW CAUSE

SHUNTE KING (a non-party in the referenced matter) is hereby ordered to appear on the 22nd day of January, 2025 at 9:00 o'clock A.m., to show cause why she should not be held in contempt of court, pursuant to LSA – C.C.P. Art. 222, based on the following:

1. Willful disobedience of any lawful judgment, order, mandate, writ, or process of court (La C.C.P. Art. 224(2)); specifically, Shunte King willfully interrupted the course of the November 14, 2024 hearing on a contempt of court charge lodged against her husband, plaintiff John Clifford J King. Shunte King willfully and knowingly and unlawfully called 911 in an effort to remove her husband, John Clifford J King from the courtroom while under direct examination by Judge Ronald C. Richard. Shunte King intentionally and willfully disrupted and interfered with court proceedings.

SIGNED this 15th day of November, 2024.

RONALD C. RICHARD
JUDGE, DIVISION B

A TRUE COPY
Date: 11-19-2024
Clerk

Gmail

True King <truekingfile@gmail.com>

From Judge Ronald C. Richard re: King Contempt of Court

Oliver Schrumpf <oschrumpf@schrumpf-law.com> Fri, Nov 22, 2024 at 11:58 AM
To: Kay Bang <kay.bang@lccitycourt.org>, <truekingfile@gmail.com>
Cc: KAMIE DOMINIC <kamiedominiclaw@gmail.com>, Monica Abshire <mabshire@lccitycourt.onmicrosoft.com>, Jinnifer LeBlanc <jleblanc@schrumpf-law.com>

I do not represent Mr. King nor Mrs. King regarding any alleged contempt of court matter. My representation was strictly on the claim against Renee Amos. Please remove me from further correspondence on issues of contempt.

Oliver “Jackson” Schrumpf

Schrumpf Law Office (PLC)

3801 Maplewood Drive

Sulphur, LA 70663

Phone: 337-625-9077

Fax: 337-625-8231

oschrumpf@schrumpf-law.com

[Quoted text hidden]

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

John CJ King Sr.
Plaintiff, Pro Se

VS
Renee Amos / The Hartford
NO. 23-2124
Lake Charles City Court, Civil Ward #3
Calcasieu Parish, Louisiana

***Amended to include evidence of grounds for Judicial Intervention due to what appears to be efforts of judicial bias that may be known to Judge Richard. There have been repeated efforts to intimidate existing counsels, and dissuade new counsel from enrolling into the case by means of ex parte communications. Efforts to deny rights to legal counsel, documented multiple attorneys have attempted to enroll and have been dissuaded by the clerk's office with misleading rhetoric. Special privileges such as the attendance of Orelia Lawdins - Trent legal counsel for Charmaine Y. Colston whom I am a registered domestic violence victim and continue to suffer harassment and stalking examples of this are seen in the Court Records for case #23-2124 as Charmaine Y Colstons attorney said she could not be served as she was not party to the case however the documents she requested by conformed copy mailed to her are in fact grounds for adequate service as Charmaine Colston herself requested the documents. Her then attorney was allowed to attend closed proceedings for the trial on May 21, 2024 prior to a non related family court trial on May 25, 2024 and her presence was inaccurately not recorded into the record as required by law as all non interested parties were asked to be removed from the courtroom and she was not enrolled as council nor was she a witness and this violation was permitted .

Clerk's office denies ever speaking to any attorneys but their efforts to enroll have happened repeatedly since July and they were told Judge Richard is unhappy (refer to evidence and exhibit attached) please refer to documented emails and subpoenas that show at least 5 separate attorneys were either intimidated, told misinformation, told information with intent to dissuade enrollment. There is also the disregard of the untimely filed motions of Kamie Dominic on Oct 31, 2024 where she was required by law to serve concurrently upon both Judge Richard and the plaintiff John King Sr her motions and arguments and she did not. Counsel was allowed to make defamatory lies of infidelity in Kings marriage claiming involvement of a paramour where no such paramour exists. Refer to Louisiana legal definition of paramour, (current sexual / romantic nature person of interest or mistress) how can this be when King was cohabitating with spouse and married at the time the negligence and fraud by Amos occurred ? Additionally all ex girlfriends cannot be considered paramours and Colston is not the immediate preceding romantic partner prior to Kings spouse. If there was a paramour by legal definition it would apply to any persons of romantic nature prior to current spouse, and post any involvement with

on/ off again relationship with ex girlfriend Charmaine Y Colston. In addition Ms Dominic leaves room for misinterpretation as she makes a salacious claim of paramour without any relevance to the case. She screams that Amos' reputation deserves consideration yet it is unethical and she has no evidence of any paramour as King had not seen Colston in person for 13 months prior to transfer of his vehicle illegally. Im asking that this line of Kamie Dominic petition be stricken from the record as it creates risk for King in future legal proceedings that either his current wife, or ex girlfriend can use Dominics petition as proof of an existing Paramour during the marriage and depending on state in which possible divorce proceedings could be filed this could have detrimental financial damaging effects to King.

Lastly and most importantly after reviewing this case with hospital attorney, and the policy of SW Airlines, United Airlines, TSA, Port Authority and the laws of HIPAA and the additional medical procedural protections allowed by the state of New Jersey to seek legal injunction and or restraining order if evidence of violation of civil rights exists or any order by an out of state judge poses immediate threat to patients life or standard of care. Judge Richards inability to consider zoom appearance on an immobile plaintiff who cannot meet clearance standards to fly prior to November 13, 2024 as right now a no fly order is in place for John King due to spinal cord swelling resulting in temporary paralysis and seizure. The request by Judge Richard to appear only in person less than 24 hours after admission for follow up care as documented in the patient chart is not only unreasonable but unconstitutional and deadly. No reasons have been provided as to why Kamie Dominic had 6 months to file her motions timely and she did not file within the 15 day window and did not file concurrently as required by law. As a result this intruded on my right to legal counsel. She also served me on November 1 a legal holiday and I have 7 days from that date to have a motion for continuance received by the clerk's office and Tracking number says the wet signature motions were received timely as Nov 1 was a legal holiday in the state of Louisiana.

Additionally, on November 6, 2024 repeated efforts to reach Lake Charles City Court were prevented as the fax and phone lines were down per Dominic, Bash and my wife Shunte King made repeated attempts to contact and was denied on dates of deadline. Additionally this happened on Oct 31, 2024 and I had to send evidence to Monica Abshire via email to be time stamped in time with exhibits and this was not permitted as Monica Abshire claims she could not see attachments to the notarized petition.

At this time and the lack of a status conference or any audio or court transcripts from prior proceedings how can Plaintiff defend the untimely motions presented by Kamie Dominic as all of the evidence points to some sort of bias in the proceedings as “Renee doesn't have a pot to piss in” has taken priority of the life and civil rights of plaintiff John King and requires the intervention of Judge Richard to stop the influences coming from the clerks office as more than one attorney has sent email complaints of clerks office unwillingness to send case file information, unwillingness to act in a timely fashion, and an eager willingness to share Judge Richard position and emotion towards case # 23-2124 which would be grounds for mistrial with the addition of Orelia Lawdins - Trents presence in the court room being left out of the minutes for a

closed hearing as well as Charmaine Colston by order of conformed copy received appropriate service from the clerk's office.

Dear Honorable Judge Richard,
After repeated denials of due process, and several attempts to deny a fair and balanced trial, and repeated ex parte communications, lack of service, and overall what appears to be an effort to provide Renee Amos with a documented unfair judicial advantage it is now necessary to file evidence and petition ito the record for case number #23-2124 and to serve in proceedings for medical intervention protections for grounds for appeal and for out of state judicial proceedings including but not limited medical injunctions to prevent ordered removal from the States of New York and New Jersey for which NJ/NY Port Authority, TSA, and state transportation guidelines for disabled transport are in place that prevent the transport of John C King Sr plaintiff for means of medical emergency.

Additionally as per the evidence attached opposing counsel is being granted liberties that are in violation of due process and Judge Richards own legal precedent that does not permit untimely served motions and evidence to be permitted unto the record. Please refer to

Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motions to Strike and for Sanctions

Dear Honorable Judge Richard,

I, **John King Sr.**, the plaintiff in the above-referenced case scheduled for hearing on **November 14, 2024, at 9:00 AM**, hereby submit this **Motion for Continuance, Motion to Quash, Motion to Strike, Motion to Dismiss Frivolous Motions, and Response to Motion to Strike and Motion for Sanctions**. This submission is made in accordance with the Louisiana Code of Civil Procedure and evidentiary rules, and it seeks to address the procedural and substantive deficiencies in the defendant’s recent filings while preserving my right to fair proceedings.

Clerk Please Serve Instructions

Please serve the defendants through their attorneys as follows:

- **Renee Amos**: Serve through her attorney, **Kamie T. Dominic**, at the address below, and through the electronically submitted copy delivered to **kamiedominiclaw@gmail.com**.

Kamie T. Dominic, LLC, #40184
1400 Ryan Street
Lake Charles, Louisiana 70601
kamiedominiclaw@gmail.com

- **The Hartford**: Serve through its attorney of record as soon as identified, at the attorney's listed address, or directly if no attorney is assigned.

Service to be processed by **Clerk Monica Abshire**.

Tracking # 9505514194044309 63

Grounds for Motion

1. Motion for Continuance Due to Illness or Incapacity**
Pursuant to **La. C.C.P. Art. 1601**, a continuance may be granted upon written motion and showing that it is in the interest of justice. I request a continuance due to severe medical conditions that render me unable to travel or attend proceedings in person. I was recently hospitalized following an incident that resulted in temporary paralysis due to degenerative spinal disease. This condition constricts my spinal cord, resulting in periods of paralysis and severe pain.

Medical records, attached as **Exhibits A-C**, document the progression of this condition. Medical professionals have advised that flying is not currently possible given my use of a neck brace and walker, combined with high risks associated with my spinal injury. I am currently undergoing treatment at an out-of-state neurosurgery facility and have been advised against travel until swelling reduces and my risk of further paralysis stabilizes. These providers, located in New Jersey and New York, are necessary due to my health plan network, and I require ongoing therapy that is unavailable locally.

This request is made in good faith and not for the purpose of delay, and it meets the "interest of justice" standard for continuance due to incapacity per **La. C.C.P. Art. 1602**.

2. Motion to Quash Frivolous and Unsubstantiated Motions
Recently, the opposing counsel filed motions, including a **Motion in Limine**, seeking to exclude specific evidence without substantial grounds. I respectfully request that these motions be quashed or dismissed as they contain unsupported claims and insufficient justifications, particularly given the fact that I, as a pro se litigant, have not introduced hearsay evidence requiring exclusion. Additionally, the Motion in Limine fails to specify evidence under any recognized hearsay exception outlined in the **Louisiana Code of Evidence Article 803 or Article 804**.

As these motions create undue prejudice and complicate my ability to proceed without counsel, I request that they be quashed, allowing a fair trial on the merits without procedural distractions.

3. Motion to Strike Defendant's Newly Filed Motions and Request for Adequate Counsel
In addition, I am requesting an extension to seek adequate counsel. Opposing counsel has filed new motions as recently as **October 31, 2024**, for which I have not been served or received

notice via electronic filing, per **La. C.C.P. Art. 1313** on service requirements. Due to these last-minute submissions and without proper notification, I am disadvantaged in providing a response or securing competent counsel.

Considering that the defendant's representation creates an imbalance, I respectfully request a continuance to allow sufficient time to secure counsel and respond appropriately.

4. Motion to Dismiss Frivolous Motions for Lack of Evidence and Adequate Basis
I further move to dismiss motions that lack merit or sufficient grounds as frivolous per **La. C.C.P. Art. 863**, which mandates that all pleadings be signed in good faith and supported by law or fact. Counsel for the defendant has submitted motions requesting exclusion of witnesses and hearsay evidence, although no hearsay witnesses have been identified. Given the procedural impact of these motions and my limited ability to contest them without representation, I respectfully request dismissal of any motion unsupported by substantial evidence.

5. Opposition to Motion in Limine on Hearsay Evidence
In response to defendant’s **Motion in Limine** to exclude hearsay, I oppose the motion as follows:

- **Specific Hearsay Exception**: The defendant seeks to exclude statements made by individuals who can provide firsthand accounts of my presence and actions. These statements fall under exceptions such as **La. C.E. Art. 803(2), “excited utterance”**, and **La. C.E. Art. 803(3), “then-existing mental, emotional, or physical condition”**. For instance, my coworker and physical therapist, both of whom were present during critical periods, can testify to my whereabouts and activities, which directly contradict claims by defendant Renee Amos.

- **Reliability and Trustworthiness**: The statements are reliable as they are corroborated by U.S. Government-issued time-stamped documents, specifically my **Global Entry records from U.S. Border Patrol**. These documents, which include my passport scan and timestamp of my border crossing, support the credibility and accuracy of my witnesses’ statements regarding my location during the alleged incident.

- **Counter to Prejudice Argument**: Admitting this evidence is crucial to counter the defendant’s claims regarding my presence in Louisiana. The probative value of these records and statements outweighs any potential prejudice, as they are key to establishing my case.

6. Response to Motion to Strike and Motion for Sanctions Based on Alleged Fraudulent Inducement
Defendant’s motions to strike certain pleadings and for sanctions on the grounds of **alleged fraudulent inducement** lack basis in fact and law. The motion implies without evidence that my claims were filed in bad faith. I dispute this allegation entirely. My claims have been made in good faith, supported by facts, and substantiated by evidence. **Louisiana Code of Civil

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

Procedure Article 863(B)** specifies that sanctions are warranted only when it is shown that a party has made claims lacking merit or presented in bad faith. No such evidence exists here.

Further, I have attached legitimate documentation, including medical records and government-issued travel documentation, that substantiate my claims and establish a factual foundation for this case. **La. C.C.P. Art. 864** safeguards pro se litigants from facing sanctions when claims are legitimately supported. Therefore, I respectfully request that the Court deny the defendant's motion for sanctions as it lacks the necessary factual basis and is otherwise unsupported.

Conclusion and Relief Requested

In the interest of justice and to ensure a fair proceeding, I respectfully request that the Court:

1. Grant a minimum continuance of six (6) weeks due to medical incapacitation and the need to secure counsel.
2. Quash and strike frivolous and procedurally defective motions submitted by the defendant.
3. Deny the Motion in Limine to exclude hearsay and admit all pertinent and reliable evidence, including witness statements and supporting government documentation.
4. Deny defendant's Motion to Strike and Motion for Sanctions, as no basis for fraudulent inducement exists.

Respectfully submitted,

John CJ King Sr.
Plaintiff, Pro Se
Date: October 31, 2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

ORDER

Considering the foregoing motion, IT IS ORDERED that this matter come on for trial on the ____ day of _____, 2024, at _____ o'clock AM, Lake Charles, Louisiana.

_____
signature

Case # 23-2124 King Vs Amos The Hartford 11/6/2024

Motion to Reconsider, Motions to Intervene Lack of Due Process, Motions to Dismiss Quash

STATE OF LOUISIANA
PARISH OF CALCASIEU

1. **Affiant's Personal Knowledge**: I, **John CJ King Sr.**, am the plaintiff in case number **VS NO. 23-2124**, currently pending before the **Lake Charles City Court, Civil Ward #3, Calcasieu Parish, Louisiana**. All statements contained in this motion and the attached exhibits are made based on my personal knowledge or upon information and belief, and are true and correct to the best of my knowledge.

2. **Grounds for Motion**: As outlined in my Motion for Continuance, I am currently under significant medical care due to degenerative spinal disease, which has temporarily resulted in paralysis and limits my ability to travel or sit for extended periods. Medical documentation supporting this condition and detailing my treatment is attached as Exhibits A-C.

3. **Request for Continuance**: Due to this medical condition, I am unable to attend the hearing scheduled for **November 14, 2024**, and respectfully request a continuance to allow sufficient time for my medical

4. Exhibits to accompany motion to intervene to protect civil rights.

John C King Sr
!!/5/2024

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

COPY

LAKE CHARLES CITY COURT

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

JOHN CLIFFORD J KING Plaintiff	*	
VERSUS	*	NO. 23-2124
RENEE AMOS NOTARY PUBLIC NOTARY ID# 29374 Defendant	*	

* *

This proceeding was taken in connection with the captioned cause, before the Honorable Judge Ronald C. Richard, at the offices of City Court, Lake Charles, Louisiana, on the 14th day of November 2024, beginning at 11:00 a.m.

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DEFENDANTS' EXHIBITS:

None

PROFFERS

BY PLAINTIFF:

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Copy of CrossFit check-in dated 9-7-21 (previous marked as plaintiff exhibit 4) 30, 114

Proffer-2
Copy of CrossFit check-in dated 9-8-21 (previous marked as plaintiff exhibit 5) 34, 114

Proffer-3
Affidavit of CrossFit (previous marked as plaintiff exhibit 6) ... 38, 114

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* * *

PROCEEDINGS

* * *

COURT CALLED TO ORDER

* * *

THE COURT:

Good morning everyone. We have a number of things on the docket. I'm gonna try to move the, what I would call the quickie stuff, uh, and so I believe we have an eviction matter on the docket.

* * *

OTHER MATTERS CALLED

* * *

THE COURT:

All right. You may be seated. All right, counselors do we have everybody here? Do we ... I'm gonna call the matter of John Clifford J King versus Renee Amos, docket number 23-2124. Looks like we all have counselors here. All right, counselors make your appearance and then we'll have the witnesses sworn in.

MS. DOMINIC:

Good morning Your Honor. Kamie Dominic

on behalf of Renee Amos and Hartford Insurance Company.

THE COURT:

All right. Oliver?

MR. SCHRUMPF:

Oliver Shrumpf for John Clifford King.

THE COURT:

All right, now, Miss Amos, please raise your right hand. Mr. King, uh, you stay seated. I know you got your back. Raise your right hand, let's get you sworn in. Oh whoa, whoa, we got another witness. Any other witnesses in here? You a witness sir?

MS. DOMINIC:

No.

THE COURT:

Where's Ms. King?

MR. SCHRUMPF:

Ms. King is outside.

MR. KING:

In the lobby.

THE COURT:

Let's ... let's grab her real quick. We'll just get everybody sworn in at one time and that way we get it knocked out.

MS. DOMINIC:

And Your Honor, and then any witnesses besides Mr. King and my client, ask to be sequestered from the courtroom.

THE COURT:

Okay. No problem. No problem. We gonna do that and I can give them the sequestration speech when they come in. Just FYI, my staff, uh, we have ordered lunch and we will eat right through trial, uh, because I think we can move this along rather quickly. But, we hadn't had breakfast since 6:30 and we hungry. All right, now we got her in here ... all right, ma'am give us your full ... well, let me get you sworn in first and then we can ... all right, everybody raise your right hand.

(THREE WITNESSES SWORN)

* * *

RENEE AMOS

JOHN CLIFFORD J KING

SHUNTE KING

* * *

Witnesses called on behalf of the plaintiff, John Clifford J King and on behalf of the defendant, Renee Amos Notary Public

Notary ID# 29374, having been duly sworn by the Deputy Clerk of Court, were examined, and testified on their oath as follows:

THE COURT:

All right. So, I've got them, uh, uh, notified ... ma'am, give us your full name for the record real quick. Just speak loudly towards the microphone.

MRS. KING:

My name is Shunte Jones King.

THE COURT:

All right. Good deal. All right, Ms. King, what we're gonna do is, uh, he's a witness, she's a witness, but they're also parties so they get to stay in the room. You're a witness ... are you a witness? Okay, so, uh, you're gonna be put under what's called the rule of sequestration. That means you got to sit outside in the lobby and hang out until it's ... you're called to get on the witness stand. After you get on the witness stand and they're done with you, then you get to stay in the courtroom, okay? So you're gonna have to just take a seat outside and hang out until they call you in.

MRS. KING:

I'm supposed to bring something to your attention. I'm required by law, uh, by the state attorney general to ...

THE COURT:

Not right now. We'll do that when I bring you in, okay?

MRS. KING:

Okay.

THE COURT:

The rule of sequestration is in effect. Please remove yourself to the lobby. All right. All parties may have a seat. Now, uh, Mr. Schrumpf, you're the moving party with the plaintiff. So, uh, the ball is in your court and the way we're set up here with minimum number of witnesses, uh, I suggest we just keep everybody in their seats. Makes it easier, plus I don't want Mr. King having to come up and down where the witness stand is, okay? And just everybody remember, speak to the microphone. Mr. King, you got to get it to the microphone. Ms. Amos, got to get it to the microphone, okay? All right, go ahead Mr. Schrumpf.

MR. SCHRUMPF:

Your Honor ...

THE COURT:

... Any pretrial matters we need to address?

MR. SCHRUMPF:

Did you receive the pretrial memo that I sent?

THE COURT:

I did. I've received your pretrial memorandum.

MR. SCHRUMPF:

Okay.

THE COURT:

I've reviewed it ...

MS. DOMINIC:

And Your Honor, at this time, I would like to object to certain things that's in the pretrial brief. I wasn't ... my understanding it wasn't required of the Court ...

THE COURT:

It was not required.

MS. DOMINIC:

But I do ... oh so sorry.

THE COURT:

Get that mic. Sorry.

MS. DOMINIC:

Sorry. As I was saying Your Honor, I would like to object to certain things that's in a pretrial brief. As I ... as I mentioned, it wasn't a requirement of the Court but I am requesting, uh, to the Court to strike the mention of the fifteen thousand (15,000) purchase price from the pretrial brief due to lack of supporting evidence. Uh, the fifteen thousand (15,000) was due to the purchase ...

THE COURT:

.. let me, let me ...

MS. DOMINIC:

... alleged purchase price.

THE COURT:

Let me cut you off real, real quick. The pretrial brief is not evidence.

MS. DOMINIC:

Okay.

THE COURT:

It is not considered as such. I don't think it was actually even filed into the record. It was just provided to the Court 'cuz

that's what pretrial briefs generally are done. I'm sorry ma'am. I'm not worried about the pretrial brief. It don't mean anything to me one way or the other. It's just one side's way of kind of saying, hey here's what we're gonna do and here's what we think. It's got to get on here under oath before it means squat diddly to me, so don't ... I'm ...

MS. DOMINIC:

Yes Your Honor.

THE COURT:

... I'm just going to disabuse you of your concerns. You don't have to worry about that.

MS. DOMINIC:

Thank you Your Honor.

THE COURT:

Okay. So don't ... don't sweat that. Do we have any other pretrial matters? Any agreement on evidence? Anything of that nature?

MS. DOMINIC:

No Your Honor.

THE COURT:

You don't' have anything? Okay, well

let's get this party started. Go ahead Mr. Schrumpf.

MR. SCHRUMPF:

I'd like to call Renee Amos under cross examination.

THE COURT:

Okay. Now, Ms. Amos let me ... your lawyer will tell you this but let me give you sort of the quickie protocol. He's calling you as a witness under what's cross examination. He's not calling you under direct examination. That means he basically gets to treat you as a hostile witness in the sense of he gets to ask some leading questions and he gets to do things a little differently than he would be allowed to do, say with his own client, under direct examination. So, listen to the question. Answer the question to the best you can. If you're unsure, you have counsel. Look at counsel, uh, and I caution both sides. If you're testifying in any way Ms. Amos or Mr. King and your lawyer starts talking, quit talking all right? He's trying to, she's trying to do her job. Be quiet and let them do their job, okay? All right. Go ahead.

MR. SCHRUMPF:

May I approach?

THE COURT:

Yes sir. Thank you Ollie. It'd be nice if the judge can see some stuff.

MR. SCHRUMPF:

I'm gonna do it.

THE COURT:

Merci bon. Let me see ...

* * *

RENEE AMOS

* * *

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on her oath as follows:

* * *

CROSS EXAMINATION

BY MR. SCHRUMPF:

Q. Ms. Amos, please state your full name.

A. Renee Amos.

Q. And, what is your address?

A. I beg your pardon.

Q. Your address?

A. 1208 17th Street, Lake Charles, Louisiana.

Q. Are you a Louisiana Notary?

A. Yes, I am.

Q. Notary number 29374?

A. Correct.

Q. And you furnished a bond as required by law?

A. Yes.

Q. To be a notary? Do you have any additional insurance besides the insurance bond?

A. No, I do not.

Q. Do you know Charmaine Colston?

A. I'm aware of the name. I do not have a relationship with her.

Q. On September 7, 2021, did you do notary work for Charmaine Colston?

A. On September 7th of 2021, per the back of this title, that is my signature but I would also say ... I would stipulate that and explain there were two (2) people present.

Q. So is Exhibit 1 the, uh, notary work that you did on that date, September 7th 2021?

A. This is what you're talking about?

Q. Yes ma'am. I've labeled it Exhibit 1.

A. Since there's not a front of it, I do not see the front of the title, but it is my signature, so ...

Q. I have ... I have the front. It's coming up ...

A. Well, I don't see the front so this is my signature, if that's what you're asking.

Q. Okay. I offer Exhibit number 1 Your Honor.

THE COURT:

Okay. I'm ... and I'm trying to see where everything is too. I see a Charmaine name. I see a P.O. Box. I see a Charmaine (indiscernible) maybe ... I'm ... I'm trying ... and it's just so dad-gum blurry, I'm trying to figure out what it ... what it's saying.

MS. AMOS:

Uh huh.

THE COURT:

Where is ... oh, I see Ms. Amos' signature, uh, okay, all right, I got that part down. All right. Any objection counselor to the introduction of this into evidence as Plaintiff 1?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it will be admitted as Plaintiff 1. There you go Madame Clerk.

BY MR. SCHRUMPF:

Q. And the import of Exhibit 1 is a transferred title from John King to Charmaine Colston?

A. That is what it indicates, yes.

Q. Okay. And you kept an ID for that transaction, did you not?

A. My practice is to check the IDs of all parties, the buyer and the seller.

Q. And, I've shown you exhibit 2. Is ... exhibit 2 is the ID that you had for that transaction?

A. I cannot see the ID. I see the name of Charmaine Colston, so I will make the assumption that this is in fact her ID although it's not legible.

Q. Okay. I offer Exhibit 2 Your Honor.

THE COURT:

All right, subject to our identification issues, I think we all agree that that's the ID or driver's license or something. Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. Then it'll be entered as Plaintiff 2.

BY MR. SCHRUMPF:

Q. Those documents were obtained by the Calcasieu Parish Sheriff's Office? Did ... did they get them directly from you?

A. No ma'am, no sir.

Q. I see there was no ID attached for John King.

A. I do not have a duty to keep copies of IDs. I check the ID and validate it when they're in my office. I would not have a copy of Mr. King's ID nor Ms. Colston's ID for that matter.

Q. And John King, uh, you have no ID for him from September 7th 2021?

A. I beg ... ask that question again. I'm sorry.

Q. You do not have an ID showing that John King was present on December ...

A. ... I ...

Q. ... September 7th 2021?

A. On September 7th 2021, per my practice, I would have seen the ID of John King as the purchaser, as the seller excuse me, and Charmaine Colston as the, uh, as the purchaser, but I do not have copies of those IDs.

Q. Do you know John King?

A. I do not know him.

Q. Would you recognize John King if you saw him?

A. The first time I ... I would ... I don't ... I saw

him that one (1) time in my home. Would I have recognized him if I had not seen him in this courtroom previously, no sir I would not.

Q. It's your testimony that two (2) people showed up on September 7th 2021. One of them was Charmaine Colston. Did you identify John King?

A. My testimony is that I identify the buyer and the seller. Two (2) people showed up. I identified Ms. Colston and I identified Mr. King. I had to have identification. That identification could have been an ID, a driver's license, in some cases a passport, but both parties were properly identified before I proceeded.

Q. Ma'am, was the title ... the back of that title already signed by someone before Ms. Colston came in with it?

A. No. The title was blank on the back. My ... my policy is to look at the title. I look at the front of the title first to make sure who the sellers are. Sometimes there are more than one sellers. I then turn the title on the back. Had there been a signature on the back, I could not have proceeded.

Q. It would have been wrong to notarize it if it had already been signed, correct?

A. If it was ... if it was already signed, I would

have ... if it was signed by Charmaine Colston I would have identified her and asked her why she signed it. If it was signed by John King, I would have validated that, but there was no signature on the back of the title. In those instances, the next thing I would have done if I had some suspicion was I would have gone to the Justice of the Peace. So, I would not have proceeded if I saw anything wrong.

Q. So you have an excellent memory of what occurred on that date?

A. I do not have a memory of what occurred on that date. That's been four (4) years ago. I do have an excellent memory of my process and procedure and my process and procedure does not change.

Q. This says that the consideration was one hundred dollars ($100.00)?

A. Sometimes when people do not want to do donations, they put a small price on it. What price they tell me that they pay is the price that I put in there. I have no obligation and no ... I do not have to watch money transfer. I ask what they paid. That is not part of what I am required to do. I am required to validate identification.

Q. So you did not see the hundred dollars ($100.00) transferred?

A. I cannot remember.

Q. Was it a check?

A. I do not know sir. They could ... I have no idea how they transferred it. It's very possible they transferred money in front of me but I do so many of these, uh, often times money is transferred, yes, and I'm not involved in that. I don't count it. I don't have anything to do with that. Not my job.

Q. Ms. Amos, would you agree that if John King was in New Jersey on September 7th 2021 that he could not have been the one that signed that document?

A. I have no idea, uh, I will not agree or disagree with that. I'm going to say that someone was in my residence on that day representing themselves as John King. I looked at a driver's license, identified it.

Q. But you did not keep a copy of the driver's license of the person that said he was John King?

A. Sir, I don't keep any driver's license. The massive amount of people that I see in a day, I could not possibly keep those records. I identify them and I move on.

MR. SCHRUMPF:

I tender the witness.

THE COURT:

All right. Ma'am, I guess if you wish

to, uh, do some directing and some follow up on his cross, go ahead.

MS. DOMINIC:

At this time Your Honor, I will waive that and wait, uh, to do my ... I'm sorry, call of chief ... chief of ...

THE COURT:

Call your case in chief?

MS. DOMINIC:

... to call my case in ...

THE COURT:

I hear you. I got you, okay. All right, thank you ma'am. I ... I want to commend you. You're doing ... you ... you talk into the microphones. That is a big deal, y'all. Keep it up. It helps Madame Clerk. It's hard on the lawyers and I guess maybe we need to get body mics before it's over with 'cuz the lawyers need to move around. They don't want to use you deputy, I don't know. You can hand them to the deputies and they'll do all the transporting around that way you don't have to ... to scurry.

MR. SCHRUMPF:

Yes, okay.

THE COURT:

And deputies, feel free to step up to get the stuff. You don't have to wait for him. I get it. The Marshal likes that process. I like that process. It keeps things orderly.

MR. SCHRUMPF:

Judge, I'm want to call John King.

THE COURT:

All right. All right, Mr. King, you are on the witness stand even though you're sitting in your seat, okay?

MR. KING:

Yes sir.

* * *

JOHN CLIFFORD J KING

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on his oath as follows:

* * *

DIRECT EXAMINATION

BY MR. SCHRUMPF:

Q. Please state your name.

A. John Clifford Joseph King, Sr.

Q. And where do you reside currently?

A. I am a resident of Louisiana, but I'm currently in, uh, New Jersey due to my wife ...

THE COURT:

Louder.

A. I am currently ...

THE COURT:

There you go.

A. I am a resident of Louisiana. I am currently living in New Jersey with my wife. She is a dual resident of New Jersey and Texas. She owns her house.

Q. How long have you been living in New Jersey?

A. I initially got my contract, uh, to go to New Jersey November of 2020 and, uh, I've been working ... well, I was working there until the end of 2021 and I got hurt and I'm using her insurance to ... while I'm hurt. So I've been there since 20 ... November of 2020.

THE COURT:

Mr. Schrumpf, we got to get you to the mic because the clerk ...

MR. SCHRUMPF:

I'm sorry.

THE COURT:

The court reporter ...

MR. KING:

I'm sorry.

MR. SCHRUMPF:

We'll both have to ...

BY MR. SCHRUMPF:

Q. All right. I show you exhibit 3, what I've labeled exhibit 3. That's the front of the Certificate of Title. Is ... is this for a vehicle that you had purchased?

A. Yes.

Q. And this says it's a 2011 Chevrolet Traverse and it's got the V-I-N number and all. Shows that you, uh, received this in April of 2021?

A. Yes. That's when I, uh, I paid it off, uh, April 5th 2021.

Q. You said that's when you paid it off?

A. I paid it off. The day I paid it off was April 5th 2021.

Q. When did you first acquire the vehicle?

A. I acquired the vehicle, uh, October of 2018.

Q. And what did you use to purchase it? How'd you fund it?

A. Uh, I, uh, I was working as a welding inspector and I used my funds from my job to pay for that.

Q. Did you borrow money against the car?

A. Yes. Yes, I borrowed money.

Q. Who'd you borrow the money from?

A. Southwest Louisiana Credit Union.

Q. And in April of 2021, you paid it off?

A. Yes sir.

Q. We'll get to that document later. All right, I offer Exhibit 3.

THE COURT:

Any objection?

MS. DOMINIC:

No objection Your Honor.

THE COURT:

All right. And then it will be entered as defense 3. I mean, Plaintiff 3.

BY MR. SCHRUMPF:

Q. And you're currently under medical care for a back injury?

A. Yes sir.

Q. When did that back injury occur?

A. Uh, May of 2021, I want to say. May or June. I'm not sure the exact day.

Q. All right. And you learned about Charmaine Colston having your car title after you paid it off?

A. Yes sir. The, uh ...

Q. Do you recall how you found out about that?

A. Yes sir. I, uh, I initially ... I went to the court

because she had it and I ... then I couldn't find it and then I filed a police report and when I got the police report back on, uh, October 3rd is when I was able to download the police report, October 3rd of 2022, that's when I discovered who exactly had it.

Q. Did you ever intend to give the car or sell the car to Charmaine Colston?

A. No, not at the time.

Q. Did you intend to, uh, transfer it to her?

A. No sir.

Q. Did you appear on September 7, 2021 before Ms. Amos and sign the ... the transfer of that document?

A. No sir.

Q. Now on Exhibit 1, this says that Charmaine Colston and you both ... and she's testified that both of you appeared. Were you there on September 7, 2021?

A. No sir. I was in New Jersey. I ... at the time, I would ... it would have ... I would have actually been at work.

Q. Did you ever actually see the title?

A. I've never seen the title. This is the only copy I've ever seen.

Q. And this came from the Sheriff's Department?

A. Yes.

Q. After you filed a complaint?

A. Yes.

Q. Do you have evidence that you were in New Jersey on September 7, 2021?

A. Yes. I have multiple pictures, multiple videos. I have, uh, I have my work reports.

Q. All right. Hold a minute. We'll start with exhibit 4.

MR. SCHRUMPF:

One for the judge and one for each of you.

BY MR. SCHRUMPF:

Q. Okay. Can you tell us what exhibit 4 is?

A. Exhibit 4 is my Cross Fit check in. Everyday when we go to class, we get checked in.

Q. All right. You go to class?

A. It's Cross Fit.

Q. And ...

MS. DOMINIC:

And Your Honor, I'd like to ...

Q. ... at the top left of this ...

THE COURT:

Hold on a second. I believe we have an objection.

MR. SCHRMPF:

Okay.

THE COURT:

Go ahead counselor.

MS. DOMINIC:

Yes. I would like to object to it. Lack of foundation, lack of authentication. It really doesn't tell ... it just has Cross Fit on it. It doesn't say where he's at or anything Your Honor.

MR. SCHRUMPF:

So ...

MR. KING:

Okay.

MR. SCHRUMPF:

We'll get to that.

MR. KING:

Yes sir.

MR. SCHRUMPF:

Your Honor, if I may, uh, ask him some more questions about it, I think we'll clear that up.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. At the top left is a date, September 7, 2021. It says HEIC Image. Is this something you get on your phone?

A. This is actually from the, uh, this is from the

actual Arrival Cross Fit, uh, owners. They printed out the roster for that day.

THE COURT:

Counselor, can ... can all counsel approach please?

MR. KING:

And he's the owner.

THE COURT:

I got a question.

* * *

BENCH DISCUSSION WITH COUNSEL

* * *

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. This is your check-in for Cross Fit on September 7, 2021?

A. Yes.

Q. The date is on the top left?

A. That's right.

Q. And your name appears next to the last name on there, John King?

A. Yes sir.

Q. You checked in?

A. Yes sir.

MR. SCHRUMPF:

I'm gonna offer exhibit 4.

THE COURT:

Is this the ... is this the one we had the objection on?

MS. DOMINIC:

Yes Your Honor.

MR. SCHRUMPF:

Yes.

THE COURT:

I hadn't ruled on the objection yet, did I?

MR. SCHRUMPF:

Right.

MS. DOMINIC:

No Your Honor.

THE COURT:

Okay, uh, I ... I'm just kind of feeding off what ... what Madame counsel said about authentication and I don't know where ... I don't understand ... this doesn't tell us where this Cross Fit place is.

MR. SCHRUMPF:

Judge, Judge, I'm getting to that on exhibit 6 but ...

THE COURT:

So I'm ... I'm trying to figure out

what my ruling's gonna be. I tend to ... tend to not let it in until there's some basis that makes me think it's relevant and that it's authentic. My wife does that Orange Theory stuff and I'm always seeing her brag with these dang things showing she was there doing stuff, but I just guess she's right and I mean, could be a sinister plot to confuse me. I don't know. But, I ... I ... at the time, I still don't see ... I don't see, uh, authentication and I don't see a back ... a foundation laid for entry of this. Why don't we ... why don't we hang tight and see what else we can try to get in to build towards this.

MR. SCHRUMPF:

Okay. Exhibit 5 is for the next day, September 8th 2021, same thing.

THE COURT:

Okay. Same ...

MS. DOMINIC:

And I will object to that Your Honor, same thing.

THE COURT:

Same objection?

MS. DOMINIC:

Yes Your Honor.

THE COURT:

Same objection and I'll ... I'll stand ... I'll hold ... I will grant both ... I will sustain both objections pending some other foundation being laid for them.

MR. SCHRUMPF:

Well let me ask him a question.

THE COURT:

Yea, go ahead. Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, were you in ... at Cross Fit in New Jersey on September 7th and September 8th 2021?

A. Yes sir.

Q. From ... from ... it says 7:30, no 7:10 a.m. until 8:10 a.m.

A. Yes sir.

Q. And is this confirmation that you had checked in on both of those dates?

A. Yes.

Q. Exhibits 4 and 5.

THE COURT:

All right, uh, does ... does that lay the foundation for you, that he says he was

there and this is his proof that he was there? I don't know how authentic ...

MR. DOMINIC:

I will still object ...

THE COURT:

... it is but it ...

MS. DOMINIC:

... I will still object to it Your Honor. As the, uh, plaintiff stated, this is a picture. It looks like it's taken on a ... I don't ... I don't know what it's taken on. Doesn't have a address. It just has a date, Cross Fit; it doesn't even say ... even though it says he's checked in, we don't know if he was ... he actually checked in.

THE COURT:

Mr. Schrumpf, do we have any kind of Cross Fit ...

MR. SCHRUMPF:

Judge, I ... I ...

THE COURT:

... certification?

MR. SCHRUMPF:

... enrolled last week and I asked for a continuance to try to put everything

together and so what I have is what the client had. It was pro se up until that time, if you remember.

THE COURT:

I will ... I will remind everybody this is a fourth fixing. I don't want to hear about me not granting a continuance.

MR. SCHRUMPF:

Okay.

THE COURT:

Because everybody's had three (3) years to get this on and get their information together. Please refrain from reminding me of my ruling. I am well aware of what it was and I articulately stated the basis therefore. So, that being the case, I'm gonna have to sustain the ... the objection because ... on the basis of ... of there's no authentication, uh, nobody knows where or what this is. I'm familiar with the general process 'cuz my wife going to Orange Theory, but I don't know what it means, or what it represents. Tell you the truth, I'm more just interested in his testimony. He telling me he was there working out that day. That kind of ... I mean, that's where he says

he was. I tend to ...

MR. SCHRUMPF:

... and I'll offer exhibit 6, an affidavit from the owner of Cross Fit.

THE COURT:

Now we're cooking with gasoline. That could do the trick. All right.

MS. DOMINIC:

And I will object to that Your Honor.

THE COURT:

'Cuz you ...

MS. DOMINIC:

Hearsay. He is not present. This was prepared outside of court. We don't know who prepared it.

MR. SCHRUMPF:

And Your Honor, this is offered only as a ... an addition to the fact that Mr. King testified this is where he was and if we get further down in this, another witness may have the, uh, photos with the GPS information on it and the date on it showing these photos that were attached.

THE COURT:

Okay, so ... wait, so is ... is this

whole stack the ... the exhibit?

MR. SCHRUMPF:

This whole thing is the exhibit.

THE COURT:

The offering? Okay, I'm just making sure I'm not missing it.

MS. DOMINIC:

And ...

THE COURT:

Okay, so let me just make sure ... counsel, have you seen this before?

MS. DOMINIC:

I have Your Honor.

THE COURT:

Okay, so ... so let me take a minute to take a peek at it y'all.

MS. DOMINIC:

Okay.

THE COURT:

Just let me look at it. All right, so what I got here is I have what's called a ... apparently it's letterhead that says Arrival Fitness, Official Witness Statement of Vincent Luu, the co-owner at Arrival Fitness in Newark, New Jersey, uh, and ... and wherein he says

that on the ... January ... I mean, September 6th, 7th, and 8th of 2021, Mr. King came and worked out, okay? And, uh, and he's offering ... this is being offered as his testimony to ... to verify that Mr. King was there. Now, the question becomes, given counsel's objection, uh, she says well if he wanted to testify, he needed to testify. I ... that sounds like a pretty good objection to me, legally. What you ... what say ye about that Mr. Schrumpf?

MR. SCHRUMPF:

It's offered to con... concur with his testimony. It just ...

THE COURT:

Oh, I get that.

MR. SCHRUMPF:

It just doubles up that he was there.

THE COURT:

All right, but ... but Mr. Schrumpf, you smarter than I am so the question becomes, legally why does it get to come in?

MR. SCHRUMPF:

Your Honor ...

THE COURT:

I get why you want to use it 'cuz it backs up his testimony.

MR. SCHRUMPF:

... I would ... I would have taken his deposition if I'd of had time to do it but I didn't have time to do it and this was supplied to me so I'm offering it ...

THE COURT:

Okay.

MR. SCHRUMPF:

... to concur that he was in that ... in New Jersey on September 7th 2021 and couldn't have been in Lake Charles.

THE COURT:

Okay. The objection is hereby sustained because I agree, if ... if it wanted to come in as testimony, there needed to be testimony either through, uh, taking a deposition or, or uh, witness being present here. I understand the point of it. I get it. It's backing up his, his uh, statement that he wasn't here.

MS. DOMINIC:

And Your Honor that includes the

pictures that was attached as well?

THE COURT:

That includes the entire offering. If anything separate out of that offering is gonna be made, it'll have to be stand on its own.

MS. DOMINIC:

All right. Thank you Your Honor.

THE COURT:

Yes.

MR. SCHRUMPF:

Your Honor I'm gonna proffer everything that didn't come ...

THE COURT:

Certainly.

MR. SCHRUMPF:

... so ...

THE COURT:

Certainly, okay.

MR. SCHRUMPF:

Okay. So have you given your copies to the ...

THE COURT:

I just handed them back to you so ...

MR. SCHRUMPF:

Okay. I'm gonna ... I'm gonna keep

them ...

THE COURT:

... if you want to lay those out to Madame Clerk ...

MR. SCHRUMPF:

... stacked here.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. I've given ... I'm showing you exhibit 7 in globo. Can you tell me what this is a copy of?

A. That's a copy of my bank statement.

MS. DOMINIC:

And I object to this too Your Honor.

THE COURT:

This is a copy of ... of your bank statement?

MR. KING:

Yes.

THE COURT:

Okay. And ... and tell me, Mr. Schrumpf, ask him some questions and tell me why we're looking at it.

BY MR. SCHRUMPF:

Q. Does this show purchases made by you on ...

MS. DOMINIC:

Your Honor ...

Q. ... September 7th ...

MS. DOMINIC:

... I don't know if you heard me.

THE COURT:

Hold on a second. I'm sorry. She's got an open objection.

MS. DOMINIC:

I'm sorry.

THE COURT:

My apologies. State the basis for your objection.

MS. DOMINIC:

I need to get closer to the mic. Can you scoot over a little bit Ms. Amos?

THE COURT:

Amos, get out the way.

MS. DOMINIC:

I wanted to, uh, and I'm sorry Your Honor for not speaking loud enough.

THE COURT:

That's okay.

MS. DOMINIC:

Objection to the bank records.

Relevance, uh, in my opinion this is ... it's not evidence to say that he actually was in New Jersey. Everyone knows you can swipe your card and it will stay there for a few days, or a week, and then it would clear. We don't even know if the days that he swipe it was the actual day.

THE COURT:

Response, counselor?

MR. SCHRUMPF:

Well Judge, he's gonna testify about the purchases he made on September 7, which if you will look, uh, are addresses in South Plainfield, New Jersey.

MS. DOMINIC:

And then Your Honor, uh ... if I may say ...

THE COURT:

... yea, yea ...

MS. DOMINIC:

... anybody, anybody can use his card. We don't know if it's his wife. We don't know if it's him. We don't know if it was stolen. We don't know.

MR. SCHRUMPF:

Well, but he's gonna testify if he gets a chance.

THE COURT:

Oh, he can start testifying right now if he wants to.

MR. SCHRUMPF:

Well, I'm ...

THE COURT:

... this ... this is all about exhibits and evidence. I'm never gonna stop somebody from talking. They can talk all they want, but ... but whether or not certain can come in, we have to do it in proper and order, uh, and so I mean, basically counselor is saying, hey one, this isn't a certified bank record. I get that. It's something that was provided to the Sheriff's Department that the Sheriff's Department provided for Mr. Schrumpf and his client. So, uh, I ... I don't ... it's a Capital One card purportedly, uh, but the real ... the real question is she ... her objection is probative ... probative value and relevance because what ... does it prove anybody was anywhere?

MS. DOMINIC:

And that's what I'm saying. We don't even ...

THE COURT:

According to American Express, I was buying something in Vegas last week. I ain't been to Vegas in a mighty long time. I promise I wasn't there, but somebody over there's using that card ...

MR. KING:

It's a Capital One ...

THE COURT:

... and buying some stuff. So I get your point, uh, I ... I'd much rather hear him just testify that he was in New Jersey doing some stuff and ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So can you ... can you use this to refresh your memory of what you were doing on September 7th 2021?

A. Yes. I ...

THE COURT:

Wait. I'm gonna allow it for that basis, okay? I ... I get it. This doesn't prove he was there or not, but if it helps him remember, oh I was at the Target on, you know,

Johnson Street or something, I'll let him do it for that purpose, okay?

MS. DOMINIC:

Okay Your Honor.

THE COURT:

So I note your ... objection noted.

BY MR. SCHRUMPF:

Q. On September 7th, did you make a purchase for four dollars and seventy five cents ($4.75) at Quick Stop Deli?

A. Yes. I used to go in there and buy a, uh, strawberry milk and the white Oreos, almost every other day. Every day I went to work out, I went to in there.

Q. All right. And then after that, there's another purchase for two sixty five (2.65) at Quick Stop Deli.

A. Yes.

Q. And this is South Plainfield, New Jersey?

A. Yes. And they ... these ... this is directly behind this. These two (2) buildings are directly on the side of each other.

Q. It's, uh, you mean where you ...

A. ... where I work ...

Q. ... had Cross Fit?

A. Where I worked.

Q. Where you worked. Okay.

A. Yes.

Q. It was near your work?

A. Yes.

Q. All right. Also on September 7th you have a five dollar ($5.00) purchase for Edison Parking Lot?

A. Yes.

Q. And where is that?

A. That is, uh, that is across ... there's a bridge that separates South Plainfield from Edison. I parked my car at Edison that night and rode the train home.

Q. All right. Next there's a purchase from Harrison Bagel Shop. Harrison, New Jersey, fourteen sixty seven (14.67).

A. Yes.

Q. What ...

A. I bought ... I bought bagels that morning before I went into work.

Q. There's a September 7 purchase for New Jersey Transit Railway. What is that?

A. That is the ticket I bought to ride home that night.

THE COURT:

So ... so what we've established is, and not necessarily that this comes into evidence, but you used it to refresh his memory that he was on the train that day and ... and

went to these places and ate those days, and that's his testimony that he was there eating and riding and doing work and stuff on those days. Okay. Well, that ... that's good testimony to me. I ... I hear it. This will be part of the proffer because I haven't allowed it into evidence.

MR. SCHRUMPF:

I'll offer the ... that was exhibit 7. I'll offer exhibit 7 into evidence.

THE COURT:

Okay. We got a new one here, let's see.

MR. KING:

Exhibit 8.

MR. SCHRUMPF:

Now I'm on 8.

MR. KING:

Oh.

THE COURT:

Yea. That's a proffer on exhibit 7, on his offer of his exhibit 7. Okay?

MR. SCHRUMPF:

No, I'm not proffering exhibit 7. I'm offering it into evidence.

THE COURT:

Oh no, but I ... I've sustained her objection.

MR. SCHRUMPF:

Okay, so I'm gonna make it a proffer.

THE COURT:

But ... but I've allowed him to review it and then that jogged his memory and then he told me what he was doing and where he was and that's, uh, quite frankly, that's really what I'm wanting to hear.

MR. SCHRUMPF:

Okay.

THE COURT:

Because if somebody specifically remembered going to the yogurt shop, that seems pretty good evidence.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. What kind of work did you do in New Jersey?

A. Welding inspector.

Q. And who were you working for?

A. I was working for Future Tech Consultants of New York and, uh, I was working at Banker Steel in South Plainfield, New Jersey.

Q. And in accordance with that, did you make reports

of your inspections?

A. Every single day.

Q. And exhibit 8 in globo is seven (7) pages of reports.

MS. DOMINIC:

And I object to that Your Honor.

THE COURT:

All right. You certainly may.

MS. DOMINIC:

And I'm objecting Your Honor due to lack of authentication, uh, on the top of this page it has six, well number six (6), dot Kings work document. In my opinion, this document, uh, has been altered. We don't know who actually wrote on top of that document. We don't know who, if someone typed the information into this document.

THE COURT:

I ... I do know that looking at the document, I, uh, I don't see anybody's signature anywhere. I ... I did a quick ... that's what I was looking for. Did ... did somebody sign off on it? But ...

MS. DOMINIC:

Also that Your Honor. No signature.

THE COURT:

There's nothing from a custodian of records telling us this is from the business, so I ... I get it about authentication. There's no custodian. I get that. I ... and I'm assuming Mr. Schrumpf, the point is, hey he was work. Here's some stuff showing he was working that day.

MR. SCHRUMPF:

Uh huh.

THE COURT:

How do we get around authentication on this?

MR. SCHRUMPF:

Well, I don't know if we're gonna do that. Again, I'll ask him from his memory if this helps ...

THE COURT:

Okay.

MR. SCHRUMPF:

... him.

THE COURT:

Okay. Yea and he can tell you what he was doing that day, what he was working on, okay. That, well that's helpful to me. Okay.

MR. KING:

Yes sir.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. John, all right, this is reports and you make these reports yourself?

A. Yes sir.

Q. Do you do it on a computer or ...?

A. Yes sir.

Q. Okay. And so is this a printout of what reports you did that day?

A. Every ... yes, every day I draw up my report and then I email it to the, uh, to the client.

Q. And so these documents ... now, did you write King's work documents on these?

A. No. That comes from, uh, the Parish. The Sheriff's Office.

Q. The Sheriff's Office wrote that on there?

A. Yes. Yes.

Q. Okay. Does that appear on each page? No, the other pages ... it's only ... item six (6) was ... this was a stack of documents that you got ...

A. ... yes sir ...

Q. ... from a Freedom of Information request to the Sheriff's Office?

A. Yes.

Q. All right. So does this show what time you were at work on that day?

A. Yes. It shows 12 p.m. to 8:30 p.m.

Q. And the ...

THE COURT:

And what day was that, man?

MR. KING:

September 7th 2021.

THE COURT:

September 7th. Okay, so the day in question, you worked those hours?

MR. KING:

Yes.

THE COURT:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. On the next page of that, also September 7, 2021, has ... it also has the same time, 12 p.m. to 8:10?

A. Yes.

Q. 8:30 p.m.?

A. That's the details 4082C004 is the detail of the member that we built. BP2684 is a piece mark of the piece that was put together. I verified everything. I verified the welder number one (1), number two (2), and I also put the welder's information in. Let's see. The

welder's information is in here somewhere. Oh, look. Welder number three (3), Candelario, and where are other two (2) welders at.

Q. Okay, so you ... you wrote this on your report?

A. Yes. B. Thomas, C. Dimaggio. I verified these numbers. Every day I, uh, I ... yea, I have to, uh, verify each and every inspector, every single day to verify that they are still in state requirements to be able to weld for the job we was on.

Q. All right. And the next page is also September 7. This is another inspection you did?

A. This is the same day, but this is the piece marks that we built. That ... the first page was the welders, the welders and details. This is the piece marks we built and the members we built.

Q. All right. The third page, same date, same time?

A. Yes. That's the last page of that day inspection.

Q. And it ...

A. Yea. There was no conformances, uh, and I ... I didn't go back and look at anything else because they finished, uh, they finished a product project and they was moving it out into the yard.

Q. Okay, now the next page is same date September 7th 2021, 12 p.m. to 8:30 p.m. What were you doing then?

A. It's the same thing. They have two (2) shops so

they have a shop, I want to say seven (7) and shop nine (9). I have to verify for both shops. I have to do a separate report for each shop.

Q. And you verified the names of the welders?

A. Yes.

Q. And their certification numbers?

A. Yes sir. This is, uh, this is all just welding details I have to verify for every single weld.

Q. Okay. And the next page, same date, same time?

A. Yes sir. Member 3091C006, uh, and it shows the piece marks BP31, BP2372 and BP32 being put together to, uh, complete number 3091C006.

Q. The next page is empty ...

A. If I had any ...

Q. ... is empty?

A. If I had any details, uh, any other details or want to add those outside of this, then I would put it on that third page. This is nonconformance that I wrote that day. 18271Z04 piping porosity the entire length of the weld. They were building forty (40) foot members, uh, they were ... it was six (6) inch thick steel on four (4) sides and for the 270 Park Ave building and, uh, I ... I rejected all that because it was a crucial member in the ... it was a crucial member in the building. It was a base member. The architect is doing

something new so it's coming up like this and it's going up and this was one of the members at the bottom. So I had to reject that for them to fix it.

MR. SCHRUMPF:

I offer exhibit 8.

THE COURT:

Okay.

MR. SCHRUMPF:

In globo.

THE COURT:

Objection standing?

MS. DOMINIC:

Objection is standing Your Honor.

THE COURT:

All right. Objection is sustained but I appreciate the testimony in that he's describing to the court specific things he did on that day. That's helpful to the court.

MR. SCHRUMPF:

Exhibit 8 is ... I'm sorry ...

THE COURT:

9.

MR. SCHRUMPF:

We're on 9 now?

MR. KING:

Yes sir.

MR. SCHRUMPF:

Exhibit 9.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Is this from your Southwest Louisiana Credit Union?

A. Yes.

Q. And again, just to refresh your memory on ...

MS. DOMINIC:

Objection Your Honor.

THE COURT:

Yes ma'am.

MR. SCHRUMPF:

... on April 5th ...

MS. DOMINIC:

Relevance.

THE COURT:

Uh, I assume he's gonna say, hey this is my account. I can testify that that's my account and that's indeed the money I paid to pay this car off on that day.

MR. SCHRUMPF:

That's exactly true.

THE COURT:

Uh, and I'm gonna buy his testimony

on that whether this is coming in or not, so ...

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Okay. So on ... you had testified that you paid off the car on or about April 5th of 2021?

A. Yes sir.

Q. And this was the transfer of eighty four hundred dollars ($8,400.00) on that date?

A. Yes sir.

Q. And this confirms that?

A. Yes sir.

THE COURT:

That's your account, sir?

MR. KING:

Yes.

THE COURT:

Do you recognize those account numbers?

MR. KING:

Yes. 100....

THE COURT:

You recognize those transactions?

MR. KING:

Yes.

THE COURT:

Okay.

MR. KING:

10000....

THE COURT:

He's ... he's identifying that document and that's his account. I'm gonna let that come in.

MR. KING:

The account number is 100005 ...

THE COURT:

... you ain't got to tell me man. As long as you look at this and you ... you recognize it, I'll let that come in as whatever number that is as actual exhibit. I don't know if I've seen Ed Bauman be this still. That's impressive, Ed.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. All right. Did you insure the Chevrolet Traverse?

A. Yes.

Q. And was it insured through Geico?

A. Yes.

THE COURT:

And by the way, I believe him. I believe he insured this vehicle. I believe he

bought Geico Insurance and no amount of additional evidence is gonna tell me he didn't unless Jesus shows up and says this guy didn't do it. So, just to help everything move along, I believe him.

MR. SCHRUMPF:

Okay.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. And you continued this insurance until about what date?

A. February 2022.

THE COURT:

Okay.

BY MR. SCHRUMPF:

Q. And so even though you didn't have the car and didn't have the title to the car, even after you paid for it you were still paying the insurance until February of 2022?

A. Yes because, uh, it was under the ... investigation was under inspection and I didn't want to stop paying and they stop investigating.

THE COURT:

Mr. King, I paid for insurance on a car I didn't have for six (6) months one time because my secretary never cancelled it. All

right. I know the feeling. It happens, man. I got you. I understand. Okay, so he paid insurance through February even though potentially he didn't have the car with him.

BY MR. SCHRUMPF:

Q. Now once you cancelled the insurance, did you have any consequences for that?

A. Yes. For some reason my license was suspended for the car that was signed over to Colston.

Q. And what did it cost to get your license reinstated?

A. It cost, uh, it cost about eight hundred and seventy five dollars ($875.00).

MS. DOMINIC:

And I object Your Honor. I don't have any documentation to that and ...

THE COURT:

I ... I'm gonna ...

MS. DOMINIC:

... relevance to this case.

THE COURT:

I'll overrule, take it to the weight of the evidence. I just kind of put it in the mix. We making a gumbo here, cher. All right.

MR. SCHRUMPF:

That's all I have.

THE COURT:

Is that it? Okay. All right. Counselor, you have some ...

MR. SCHRUMPF:

... for this witness? You have to answer her questions.

MR. KING:

Yes sir.

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Good morning Mr. King. I just have a few questions so, uh, first you say you were not present to sign the title, correct?

A. I was not.

Q. And you have no idea who was there, correct?

A. None.

Q. And then also you, uh, you mention in your testimony about your work documents, that you're the one that typed it. So is it true that you completed the documents, not anyone from your job?

A. The ... I have a supervisor who verifies all my ...

all my, uh, reports.

Q. And is it true that there is no supervisor on the documents that you provided, saying that ... showing that you actually showed up to work on 9-7-2021?

A. I have, uh, I have emails if you want them. No there is (unintelligible)...

Q. And then also, uh ... sorry, let me get to my question, you mention about a police report that you filed. Is it true that you made a police report on October 9th to the, I believe it's the Sheriff's Office, Calcasieu Parish Sheriff's Office?

A. No. I attempted. They wouldn't make a ... they wouldn't, uh, assist me at that time.

MS. DOMINIC:

Just a second Your Honor.

THE COURT:

When's somebody gonna convince law enforcement you don't get to accept or reject. People file something, they hand it to you, that ... you got to take it. Now you might not do something with it, but you got to take it. It's very frustrating Mr. King. I ... I know what you're describing. It's kind of an odd deal.

MS. DOMINIC:

Sorry Your Honor ...

THE COURT:

Especially when the ... when the officer's saying it's a civil ... they giving legal advice on a, you know, at the scene instead of just saying, file your report, give it to me, I'll run it up the chain. Just do that and don't give legal advice.

MS. DOMINIC:

And may I approach Your Honor?

THE COURT:

Yes ma'am.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. So Mr. King, on October 9th 2021, did you appear at the, uh, the Sheriff's Office to make a complaint about Ms. Colston?

A. Yes. I told them my car was stolen and I can't get it back. I said, uh, I don't want to go over there and take it 'cuz that'd be wrong.

Q. Isn't it true on October 9th 2021 you reported that Ms. Colston obtained a title of a red 2011 Chevrolet Traverse that you just paid off?

A. Oh, come again.

Q. I'm sorry ...

A. Say it again. Say it again.

Q. Is it true on October 9th of 2021, you reported to law enforcement that you ex-girlfriend, Charmaine Colston, somehow obtained a title to your vehicle, a red 2011 Chevrolet Traverse, as you just paid it off?

A. Yes.

MS. DOMINIC:

May I approach Your Honor?

THE COURT:

Yes ma'am.

BY MS. DOMINIC:

Q. Mr. King, is it true that you had a phone call on October 18th 2021 with Detective Kent Castille?

A. Yes. I had a phone call with Detective Kent Castille.

Q. Okay. And during that phone call, did you admit to Detective Castille that you allowed Ms. Colston to utilize your vehicle ... well, that vehicle, uh, and that y'all had children together?

A. So I allowed Ms. Colston to use that vehicle when we evacuated the hurricane.

Q. Okay. You ...

A. No. I'm ... I'm ...

Q. ... allowed her to ...

A. ... you asked a question, I'm giving you an answer.

THE COURT:

Hold on. Hold on. Whoa, whoa, whoa. We don't need everybody talking at one time. She asked a question. You got to answer the question. Then you get to explain.

MR. KING:

Okay. I allowed Ms. Colston to use the car when we evacuated for a hurricane.

CONTINUED CROSS EXAMINATION BY MS. DOMINIC:

Q. And then, also did you ... did you tell Detective Castille when you moved to New Jersey, you left the vehicle at your mother's residence and you continued to allow Colston to utilize the vehicle?

A. I believe Mr. Castille misunderstood what I said. I left the car and my children in, uh, Houston ... in Katy, Texas and, uh, when Colston told me she was going to leave it at my mother's house because she didn't want to deal with me, uh, that's where I thought it was.

Q. Also on October 18th 2021, did you tell Detective Castille that you left one (1) copy of the key with your mother and one (1) with Ms. Colston?

A. Yes.

Q. And ... and then also, uh, on that same day, did you tell the Detective Castille that you made most of

the payments on the vehicle but Ms. Colston also made payments?

A. Incorrect. I made all the payments. If she can provide one (1) payment, didn't happen.

Q. And, just again, uh, Mr. King you were not present ... you're saying you were not present on September 7th of 2021?

A. No.

Q. And you didn't know anyone ... have no idea what my client did or whoever was there did on September 7 of 2021 at my client's house?

A. I could not have known what your client did because I had a restraining order on her ...

Q. Oh, I ...

A. ... and I was not contacting her.

MS. DOMINIC:

I object to that, uh ...

THE COURT:

I understand. It's not responsive, uh, she's asking, is it your testimony that you don't know what went on at Ms. Amos' house that day.

MR. KING:

No, I do not know what went on at Ms. Amos' house.

MS. DOMINIC:

That is all Your Honor.

THE COURT:

All right. Okay. Next witness.

MR. SCHRUMPF:

We're gonna have his wife who has a phone with photos on it with time-stamped and GPS on it and that's beyond my, uh, abilities.

THE COURT:

And ... and ... and what is this all gonna tell us? That he was in New Jersey?

MR. KING:

Yes.

MR. SCHRUMPF:

That he was in New Jersey.

THE COURT:

I'm tending to believe he's in New Jersey. I ... I ...

MR. SCHRUMPF:

Well ...

THE COURT:

I just got to ... I mean, she doesn't remember. She don't recognize him and remember if that was him or not. I don't think the man just showed up here to lie about where he was,

uh, you know. I ... I don't even think they're beating that war drum very hard about it was him there. I don't think they're beating that war drum at all, right?

MS. DOMINIC:

Well, we are saying, Your Honor, my client doesn't remember. All she knows. Two (2) people were present ...

THE COURT:

Oh, I've heard her testimony and I believe her too. I ... I can believe everybody and then it's just about how do I rule, but I believe that Ms. Amos, like a lot of notaries I know, especially ... and look, I got five (5) notaries that work for me at one of my offices. They make me pull out my license and they work for me because that's their process. And they say, I'm never, ever gonna have to testify I varied from my process, so boss man that cuts their check has to pull out his driver's license and put it on the table. Now they don't make copies of it. I'm gonna be honest with you. They just look at it and they're like, all right, and make sure that's you. I ... I get what her testimony is and

she's already said she don't know if that was him or not. She don't ... can't remember. So, I get what her position is, which is I follow my protocol. Two (2) people came in. The lady came in. She had an ID. The guy came in. He had an ID. I looked at them, verified, said it's good to go, we did the deal. He says, I wasn't there. I'm in New Jersey and whether or not because of authentication etcetera, etcetera, on documents can come in or whatever fifty-eleven videos we got, I tend to believe the man was in New Jersey. I mean, he's describing to me going to the yogurt place that day and he's describing to me what he did at his job. He even described particularly some specific things at the job. I ... you know, that ... that's hard stuff to make up unless you just a really good liar. I mean ...

MR. SCHRUMPF:

In that case ...

THE COURT:

... that's pretty good stuff to make up.

MR. SCHRUMPF:

In that case Judge, we rest.

Suit No. 23-2124

CLERK'S CERTIFICATE

CITY COURT OF LAKE CHARLES

PARISH OF CALCASIEU, WARD III

STATE OF LOUISIANA

I hereby certify that a certified copy of the Motion and Order for Devolutive Appeal signed by Judge Ronald C. Richard has this 3rd day of December, 2024 been sent to all known parties and/or counsel of record by placing same in the United States Mail, postage prepaid and properly addressed, and/or via facsimile or Email.

CLERK

RECD LC CITY COURT CLK
'24 DEC 2 AM11:35

JOHN CLIFFORD J KING	:	WARD 3/LAKE CHARLES CITY COURT
VERSUS NO. 2023-2124	:	PARISH OF CALCASIEU
RENEE AMOS NOTARY PUBLIC ID # 29374	:	STATE OF LOUISIANA
FILED: 12-2-2024	:	M Alchin ~~DEPUTY~~ CLERK OF COURT

MOTION AND ORDER FOR DEVOLUTIVE APPEAL

ON MOTION OF Oliver "Jackson" Schrumpf, counsel for John Clifford J King, plaintiff herein, for a devolutive appeal from the judgment rendered November 14, 2024, read and signed November 21, 2024, notice of which was mailed November 21, 2024, and from the judgment ("Ruling") denying plaintiff's claims against Renee Amos.

IT IS ORDERED that a devolutive appeal be and is hereby granted to John Clifford J King and that the appeal be returnable to the Court of Appeal, Third Circuit, State of Louisiana, at Lake Charles, Louisiana, upon payment of costs in accordance with law.

SO ORDERED this 3rd day of December, 2024, in Lake Charles, Calcasieu Parish, Louisiana.

JUDGE ~~RON~~ RICHARD

Ronald C. Richard

Prepared by:

BY: Oliver Schrumpf
OLIVER "JACKSON" SCHRUMPF #11832
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12-3-2024
M Alchin

THE COURT:

Yes. I mean, I ... I think that's ... I think that's where their case goes and I just don't want to spent an hour trying to get things in and arguing about them. So, uh, it's your turn. Go ahead ma'am. No witnesses called? No other evidence, uh, offered?

MR. SCHRUMPF:

Well, I have the wife with the GPS.

THE COURT:

If you want the wife to come in and testify real quick that she was in New Jersey too and he was there, that ... that sounds like good testimony. Okay. All right.

MS. DOMINIC:

So Your Honor, he's gonna bring ...

THE COURT:

Yea, he's getting her ...

MS. DOMINIC:

... in his last witness.

THE COURT:

I think she's gonna testify and she can ... I don't want to play with all this authentication and I know, look I personally have been the victim of people saying text

messages came from me that didn't. I understand how all that can be spoofed and played and if you got a half a technical guy, you can make someone look horrible okay? I'm not ... I don't want to play that game but if ... but if ... if our dear madame can say, hey I was there and he got up and went to work and came home that day, or something along those natures ...

THE COURT:

Ma'am, we can ... we can put her on the stand. I'm ... I'm ... hey, be careful when you walk around here. There's a little step up. Be careful. All right. You're already sworn in.

* * *

SHUNTE JONES KING

* * *

A witness called by the plaintiff, having been previously duly sworn by the Deputy Clerk of Court, was examined, and testified on her oath as follows:

THE COURT:

Just one second. All right ma'am, you are already sworn in. Attorney's gonna ask you

some questions. I believe we have short-circuited a lot of the evidence in this matter just because of, uh, Mr. King's testimony. I think is pretty valid and I ... I don't think he's making up what he did that day on the job. That'd be pretty ... that'd be pretty crafty lying, okay? So I think it's gonna be an abbreviated version probably.

MR. SCHRUMPF:

I'll try.

THE COURT:

Okay. Famous last words from a lawyer. Go ahead Mr. Schrumpf.

* * *

DIRECT EXAMINATION

* * *

BY MR. SCHRUMPF:

Q. Please state your name.

A. My name is Shaunte Jones King.

MRS. KING:

I'm ... but before I'm allowed to testify, I have to disclose that, uh, and I sent a letter to Judge Richard that I am a protected crime victim from the State Attorney General's Office and I have an open case so

certain aspects of my testimony, uh, victims of extreme violence, sexual assault, uh, those special categories are recognized. I provided my CVC number, my police report, and the details of the assault.

THE COURT:

Uh huh.

MRS. KING:

And the ongoing investigation and for my protection, certain aspects of my residency, personal information, work, where I can be identified, uh, I have to bring that to your attention with the intent that it will not be disclosed for public record.

THE COURT:

Oh, sounds good to me. Here's what we're gonna do. I mean, he's your husband's lawyer so I can't tell him what to ask but I would assume he's well aware of what you just said and he's not gonna ask any questions that require divulging that anyway.

MRS. KING:

Yes sir.

THE COURT:

There you go. All right. Covered.

MR. SCHRUMPF:

Okay.

THE COURT:

Go ahead.

CONTINUED DIRECT EXAMINATION BY MR. SCHRUMPF:

Q. So when did you marry John King?

A. Huh, we had our ceremony in December of 2022 and we became a domestic partnership in the fall of 2021.

Q. So ...

A. In New Jersey.

Q. On ... do you remember September 7, 2021?

A. Of course, yes.

Q. Were you with him then?

A. Yes.

Q. Where ...

A. ... that was ... that was Labor Day weekend.

Q. Where were you on September 7, 2021?

A. On September 7, 2021, I was located in two (2) states. In New York and New Jersey, uh, with my husband. We were in New Jersey in the morning and we were in New York that night. We planned an entire Labor Day weekend of activities.

Q. Can you remember some of the activities for that night?

A. Yes.

THE COURT:

The September 7th? No, now girl, don't go telling us the late night activities.

MRS. KING:

No ...

THE COURT:

You give us the dinner activities, okay?

MRS. KING:

No, uh, I remember it because it was leading up to my official proposal with my ring so it was a very romantic weekend. On September 7th, we got up as we normally do. The doctor had approved him to do CrossFit and he was working on his core so we went to our trainer with our group.

THE COURT:

Uh huh.

MRS. KING:

Got to work out every day. After we finished working out, we had breakfast, protein shakes, uh, he got up and went to work. He at this time was still ... because he had relocated from his house to my house when we lived together, he took a transit. He was in

the process of taking a transit and leaving his then-car in a parking lot because of the traffic and gas so he went to a Park & Ride, took the train, went to work, came home in the afternoon, came home from the train station. We had dinner on that day.

THE COURT:

Where'd you have dinner, cher?

MRS. KING:

Uh, we had dinner at the house but we went and got something to eat.

THE COURT:

But in the house in New Jersey?

MRS. KING:

Yes. We had dinner at the house in New Jersey.

THE COURT:

Okay. All right.

MRS. KING:

But we went and got something to eat and we brought it back. So, I believe we may have went to a restaurant in ... that was a restaurant in New Jersey and he would have paid for it. Yea, he would have paid for the restaurant in New Jersey. And we

had dinner on the roof. I live in a warehouse that's converted so on the top floor of the seven (7) floor is a roof and we had dinner, uh, on the roof.

THE COURT:

Okay. That's September 7, 2021, right? Okay. All right.

MR. SCHRUMPF:

No further questions.

THE COURT:

Cross examination?

* * *

CROSS EXAMINATION

* * *

BY MS. DOMINIC:

Q. Hi Ms. King. I just have one (1) question. What time did you guys go to, uh, start celebrating y'all evening together?

A. Uh, on which date?

Q. On September 7th of 2021.

A. On September 7th of 2021, it was after he got home from work. His work schedule at that time, he would go in from 10 to 6:30 or noon to 8:30.

Q. So on that day, did ... it was after 6:30 or was it after 8:30 you guys went to the restaurant?

A. It would have been after 8:30, uh, 'cuz he has to come home and shower. It was ... he gets metal all over his clothes so it would have been after 8:30.

MS. DOMINIC:

That's all the questions I have.

THE COURT:

Anything further? Any follow up?

* * *

REDIRECT EXAMINATION

* * *

BY MR. SCHRUMPF:

Q. You ... you have some GPS pictures on your phone?

A. Yes sir, with the phone that you have there with Apple technology.

MR. SCHRUMPF:

Judge, if you're convinced that he was in New Jersey on September 7th ...

THE COURT:

He ... look, if it's pictures she took, see this is where it's different. If it's pictures she took and she's testifying she took them on that day, well I'm gonna let those in because I'm not worried about authentication or anything like that. And it's certainly relevant because she's showing where he is. So

now, our problem is, our court administrator who transfers all this stuff is, uh, in gay Paris for the week and so I don't know how we'll go about doing it but if she wants to pull up, and don't give us fifteen (15) of them. Pull up a couple pictures and just ...

MRS. KING:

All right

THE COURT:

... hey judge, this is the guy that was with me. I took this picture and it's wherever.

MR. SCHRUMPF:

She can show it to you and ...

THE COURT:

Yea, yea.

MRS. KING:

Yea.

THE COURT:

So, let's just do it this way ...

MS. DOMINIC:

And Judge, for the record ...

THE COURT:

... Mr. Schrumpf is asking you ...

MS. DOMINIC:

Your Honor ...

THE COURT:

Ma'am?

MS. DOMINIC:

I say just for the record, I will object to it, Your Honor.

THE COURT:

All right. I ... I get you. Go ahead and state your basis now.

MS. DOMINIC:

First, we don't know if she actually did take the picture.

THE COURT:

Uh huh.

MS. DOMINIC:

Second, authentication.

THE COURT:

Uh huh.

MS. DOMINIC:

Pictures, time on there can be manipulated.

THE COURT:

Manipulated, I a hundred percent (100%) agree with that last statement, but as

far as, uh, if she took them, she's going to testify she took them I assume and she's gonna say she took them in such and such place and that being the case, I'm gonna allow that to be, uh, authentication and obviously it's relevant. So, I'm gonna overrule your objection. Ma'am, pick ... pick ... like, pick two (2) pictures. Don't ... don't give me fifteen (15) of them. Pick a couple pictures that show ... if you got something with the New Jersey skyline ...

MRS. KING:

Okay.

THE COURT:

.. in the background, that'd be a really good one, huh?

MRS. KING:

I, uh, I sent these actually to them electronically and I mailed them in, but our weekend, like I said, was the Labor Day weekend so I start with the evening of September 6th at 6:44 p.m.

THE COURT:

Give me something from September 7th.

MRS. KING:

Okay.

THE COURT:

I'm not interested in the 6th 'cuz ... 'cuz maybe he got the redeye and got to Houston, I don't know ...

MRS. KING:

... yea ...

THE COURT:

... all kind of possibilities but give me something from the 7th.

MRS. KING:

Okay. On the 7th, uh, let me see. On the 7th ...

* * *

COURT DISCUSSION WITH BAILIFF

* * *

MRS. KING:

There's so many pictures. One second. Okay, so ...

THE COURT:

You badder ... you worse than my kids. They got fifty (50) million ...

MRS. KING:

I know.

THE COURT:

... pictures.

MRS. KING:

I know. We did a lot that weekend. So on September 7, 2021 ...

THE COURT:

... is that a Friday, a Thursday, or what was that?

MRS. KING:

That was the day after Labor Day.

THE COURT:

It's a Tuesday.

MRS. KING:

I think it was a Tuesday.

THE COURT:

Oh, okay.

MRS. KING:

We were in Central Park. This was one of our date activities. We were in Central Park. Look, there's the terrace. We were looking at ... at the, uh, actual, uh, the performances and then his phone started to blow up. So this is actual photos from the harassment.

THE COURT:

I ain't worried about all that.

MRS. KING:

And documenting ...

THE COURT:

Get off the screen with that. I ain't interested in that.

MRS. KING:

Okay.

THE COURT:

I'm interested in some pictures of him on September 7th ...

MRS. KING:

... and then on, uh, at 8:30 a.m. ...

THE COURT:

That's September 8th, though.

MRS. KING:

Yea.

THE COURT:

I need September 7th.

MRS. KING:

(unintelligible) ...

THE COURT:

Where ... where my man is on September 7th.

MRS. KING:

On September 7th, he is in New York City.

THE COURT:

Now that looks like September 7th, 11:54 a.m. I don't know where that is.

MRS. KING:

It's in ...

THE COURT:

... pictured in some grass. So, keep going. Find me something else.

MRS. KING:

It's in New York City here at the same park.

THE COURT:

Yea, that don't ... Okay, all right. Now this one.

MRS. KING:

That one. And, all of the detail for iMazing was provided with the attachments. iMazing is a software that is admissible in court.

THE COURT:

Hold on. Let that video ... replay that video. I been in Central Park, so I know.

I need to see ...

MRS. KING:

Oh, okay.

THE COURT:

I can tell Central Park ... yea. I might look like a hick, girl, but I been to the big city a couple times.

MRS. KING:

See, they've got ... they have like a romantic ...

THE COURT:

Okay. Right there. Whoa, stop. Okay. All right. Now that's the ... all right. I know that's ... okay, I've eaten lunch there. Okay, all right. Well ...

MS. DOMINIC:

And may I see that Your Honor? I've never, uh, received ...

THE COURT:

Now where's he at? Is he on ... is he in this video somewhere? I know that's the park. I'm looking for him.

MRS. KING:

He's leaning right there before the ...

THE COURT:

Yea, that one don't help me. I need one with him and I can see some Central Park-ishness in the background.

MRS. KING:

There it is.

THE COURT:

Okay. That one. That one don't help me. Central Park. Okay. Just 'cuz you put Central Park on it with your APP don't mean it's Central Park though. I'm looking for a picture of him. If there's a picture of him somewhere standing in Central Park, or standing outside the house in New Jersey, or in the taxi cab but something that lets me see ...

MRS. KING:

... it ... on the ... if you'll, this is the point that we're making. If you look at the schedule on September 8th, if he was there at 8:30 a.m. ...

THE COURT:

... September 8th don't mean nothing to me. Got to be September 7th. Got to be.

MRS. KING:

All of that was provided in an affidavit by the gym owner.

THE COURT:

No, that ... you weren't in here so you don't know ...

MRS. KING:

... I was there ...

THE COURT:

... what ... you don't know what happened with that.

MRS. KING:

I was ...

THE COURT:

You don't know what happened with that ruling.

MRS. KING:

No, no.

THE COURT:

So, hey, don't worry about that. I'm looking for, do we have some pictures or videos that show him in New York or New Jersey, uh, on September 7th that I can see it's New York or New Jersey?

MRS. KING:

We have transactions. We have ...

THE COURT:

No, no, no ...

MRS. KING:

... receipts.

THE COURT:

Listen to what I'm saying. The pictures.

MRS. KING:

Well, typically people don't always have pictures. I just did that 'cuz I was a woman in love, so I ...

THE COURT:

... no, no. That's fine ...

MRS. KING:

... have lots of pictures.

THE COURT:

I'm just asking ... okay. So Mr. Schrumpf, I don't think we have any pictures that do ... do the trick. Look through what you got there and then ...

MRS. KING:

Vincent Lou's pictures doesn't have any pictures?

MR. KING:

Yea, well some of this is the pictures you took.

THE COURT:

All right. We don't have pictures, but we got her testimony that you woke up there and you went to work that day. My only question is in looking at those pictures, that at 11:54 a.m. it's got you in ... in somewhere laying, laying on a blanket or something hanging out.

MRS. KING:

That's Labor Day.

MR. KING:

... that was ...

MRS. KING:

They don't work on, uh ...

THE COURT:

It was September 7th?

MRS. KING:

Yea. They don't work that morning ...

THE COURT:

The reason ... the reason I ask is because his testimony, Mr. Schrumpf correct me if I'm wrong, but his testimony was that he got up and went to work that day, right?

MR. SCHRUMPF:

He went ... in the morning he went to CrossFit ...

THE COURT:

... and then he went to work ...

MR. SCHRUMPF:

... and then he got some food and then at noon, he went to work and worked til 8:30.

THE COURT:

So, I got ...

MRS. KING:

12:30.

THE COURT:

I got an 11:54 a.m. picture of him not in work attire, but relaxing and chilling out in purportedly Central Park.

MR. KING:

(unintelligible) ...

MRS. KING:

He had to be at work at 12:30.

THE COURT:

Hold on. Hold on. Hold on.

MR. KING:

There was ... that picture was September 6th in Central Park.

THE COURT:

It says September 7th on it is what I'm looking at. All right. I don't think the pictures are very helpful and I don't know, quite frankly, if you even want that in evidence given my questions, but I mean, heck, she might want it in evidence ...

MRS. KING:

... is iMazing permissible?

MS. DOMINIC:

I do now.

THE COURT:

Huh?

MRS. KING:

Is iMazing permissible as evidence?

THE COURT:

I have no clue what that is.

MRS. KING:

iMazing is the software from Apple that is now permissible in court.

THE COURT:

No. We're not worrying about that today. Mr. Schrumpf, you understand what I just looked at? I just looked at ...

MR. SCHRUMPF:

... I ... I don't know what you saw but, uh ...

THE COURT:

I got ... I got his testimony that I tended to believe that he got up, he did some stuff, got some smoothies, went and worked out and went to work, came back and they did some stuff that evening. That was all September 7th. And September 7th falls on a what, y'all? Is that a Monday?

MR. SCHRUMPF:

I think she said ...

MRS. KING:

Tuesday.

MR. SCHRUMPF:

... it was the day after ...

MRS. KING:

... Tuesday. It's the day after Labor Day.

MR. KING:

The day after Labor Day.

MR. SCHRUMPF:

... Labor Day.

THE COURT:

So, it was a Tuesday?

MR. KING:

Yes.

THE COURT:

Okay. But then, I just saw a photograph, that ... that video and actually a photograph of ... of ... that purports to be him in Central Park relaxing, uh, that Ms. King took, and it's ... it's time stamped 11:54 a.m.

MRS. KING:

That's only twenty (20) minutes away. It's twenty (20) minutes from Central Park to ...

THE COURT:

... Ma'am. Ma'am. Don't argue with the judge. Just hang tight and let me do my thinking here. Uh, so it's problematic because now I'm ... now I got questions I didn't have before. Because before, I was just like, that guy was there in New York, in New Jersey, September the 7th. That's all I got to say about that and I believed him, okay? And now, I've been shown something that is different from what his testimony was.

MRS. KING:

What time does it say he went to work on that day?

MR. KING:

12 ...

THE COURT:

Hold on. That lawyer's got to do the asking and talking.

MR. SCHRUMPF:

Okay. May I ask questions?

THE COURT:

Yes. Yes. Yes. So ... so hold on. Let's ... let's finish her up. Her testimony is he was there and she testified as to what they did that day. So, is there anything else?

CONTINUED REDIRECT EXAMINATION BY MR. SCHRUMPF:

Q. Well, how ... how far was Central Park from where he had to go to work?

A. It was approximately less than twenty (20) minutes 'cuz there was no traffic. Keep in mind, this was a COVID environment so a lot of the area was cleared out. So he could get to work ... I could get to ... you could get to midtown in less than twelve (12) minutes, Manhattan. There was absolutely no traffic so where he worked was about, what eighteen (18) miles away,

seventeen (17) miles away. He had all his work things in his truck. He went back by truck and I went back by train and I believe he has the ... the transactions that day that show that he took the train to his car. An express train. And when you take the express train from Central Park, you get ...

MS. DOMINIC:

She's testifying for him, Your Honor.

MRS. KING:

No, I'm testifying for myself.

THE COURT:

Well, you ...

MRS. KING:

... on that particular day ...

THE COURT:

... if you're gonna object to non-responsive, I can do something.

MS. DOMINIC:

Oh, I object to non-responsive Your Honor.

THE COURT:

Okay. It's non-responsive. She's already answered the question. Okay. Continue counselor.

MR. SCHRUMPF:

That's it.

THE COURT:

All right. Anything from you ma'am?

MS. DOMINIC:

No Your Honor.

THE COURT:

All right ma'am. You may step down and since you've already testified, you can remain in the courtroom.

MRS. KING:

Okay. Thank you.

THE COURT:

All right. It's still ... the case is in your court at this point so to speak. Have you rested Mr. Schrumpf?

MR. SCHRUMPF:

Yes.

THE COURT:

He's rested. Counsel, what ... do you have anything further you wish to put on or do?

MS. DOMINIC:

Yes Your Honor. Before, uh, I move forward, I would ask for a directed verdict on

the matter.

MR. SCHRUMPF:

I would oppose the directed verdict Your Honor. I think there's more than adequate evidence to show that he was not present on that date.

THE COURT:

I ... I think that, uh, I will deny the motion for a directed verdict. I think that there is indeed enough evidence to consider the matter in its totality. And, uh, closings? Anyone?

MR. SCHRUMPF:

I guess I ...

MS. DOMINIC:

... And I will, uh ...

MR. SCHRUMPF:

... get to go first?

MS. DOMINIC:

I'm sorry.

THE COURT:

All right. Go ahead.

MS. DOMINIC:

And I will put my objection on the record of the, uh ...

THE COURT:

Okay. Yes.

MR. SCHRUMPF:

Judge, you've seen my memo so I won't go into the details on it, but a Notary has an obligation to identify the people before them. If you'll note, the police report that was about October I think, about a month after this event ...

THE COURT:

No police reports were placed into evidence by the way.

MR. SCHRUMPF:

Oh, well okay, I thought you showed it to him.

THE COURT:

It was showed. They were used as reference. Nobody offered them into evidence.

MR. SCHRUMPF:

Okay.

THE COURT:

And the evidence is closed.

MR. SCHRUMPF:

Well ...

THE COURT:

So ...

MR. SCHRUMPF:

Ms. Amos had no memory of the events at that time, but now she seems to remember there were two (2) people there but she still couldn't identify Mr. King. And Mr. King clearly was not there that day. So a vehicle got transferred and the Notary is either negligent or, uh, and I ... I can't assume she knew that she was being played by someone, but she failed to do what she should have done and the damage is serious here. We've got at least eighty four hundred dollars ($8,400.00) worth of the payoff on the car and then we got about twelve (12) months of insurance that was paid for the car.

THE COURT:

Uh huh.

MR. SCHRUMPF:

Until it was ... until it, uh, he cancelled the policy.

THE COURT:

Where is the car now? Did they ever get the car back, or ...

MR. KING:

She sold it. She traded it in.

THE COURT:

Okay. So the car is gone pecan? All right. Okay. Just wondering.

MR. SCHRUMPF:

And I understand under Louisiana law, the bond is ten thousand dollars ($10,000.00), so that seems to be maximum we'll be able to ... to obtain from this Notary and we feel that the judgment should be granted for ten thousand dollars ($10,000.00) against Renee Amos.

THE COURT:

Okay. All right. Counselor?

MS. DOMINIC:

Yes Your Honor. So, uh, my points that I have, uh, my client Renee Amos has been a Notary for over twenty (20) years. She has a procedure where she checks everyone ID and if she cannot find someone ... or if someone is not present, then she has a procedure for that where she goes through the Justice of the Peace, which she testified to. We have evidence, well, evidence was attempted to be placed on the record saying that he was at work

at that time which is not authenticated. Also, for Mr. King's testimony, he said he wasn't there. He doesn't know who was there. Also, uh, I'm sorry I lost my train of thought.

THE COURT:

That's okay.

MS. DOMINIC:

I had a long night ...

THE COURT:

... wait til you get my age.

MS. DOMINIC:

Uh ...

THE COURT:

Or Oliver's.

MR. SCHRUMPF:

Yea. Wait til you get my age.

MS. DOMINIC:

Basically, just on ... Your Honor, uh, like I said, Mr. King doesn't know what happened that day and the only other person that can say what happened that day is Charmaine Colston.

THE COURT:

Where is Charmaine Colston in all this?

MS. DOMINIC:

And the plaintiff ...

THE COURT:

Did nobody subpoena her?

MS. DOMINIC:

... never subpoenaed her.

MRS. KING:

Well she was subpoenaed.

THE COURT:

Ma'am. You cannot address the court. Mr. Schrumpf, where is Ms. Colston 'cuz she seems like the one to put up here and grill and ... and ... and take to task so to speak because if some funniness went on, she sure sounds like a likely culprit.

MR. SCHRUMPF:

Judge, I didn't issue a subpoena for her and I ... I ... there's a lot of things I didn't do that I would have done if I had had more time.

THE COURT:

I know. It's all my fault 'cuz I didn't grant a continuance ...

MR. SCHRUMPF:

Yea, I got to blame you ...

THE COURT:

... for the fifth time.

MR. SCHRUMPF:

... Judge.

THE COURT:

I understand.

MS. DOMINIC:

And I ... and I will say, the best evidence that could have been used in this case Your Honor is having Charmaine Colston here.

THE COURT:

Continue. I'm sorry.

MS. DOMINIC:

The best evidence in this case will have been Charmaine Colston. We do not have the burden of proof. The plaintiff does and they did not subpoena that person. And as I mentioned before, uh, they are arguing that my client acted improperly, fraudulently, but they have no proof that she actually did those things, Your Honor.

THE COURT:

Okay. All right. That being the case,

the Court's gonna take a recess 'cuz it's 12:27 and the Court's gonna go upstairs and feed his staff because they're hungry. And, uh, and we're gonna come back in thirty (30) minutes, so that gives everybody enough time if y'all want to run over to Subway or go grab a little something. For Mr. King, Mr. King, y'all are allowed to park right out here in front of the building. I don't want you tracking out in the parking lot. Make it easy on the man. Deputies, please don't write him a ticket when they park right out in front. And, we'll be back in thirty (30) and I'll make a ruling and we'll handle some matters, okay?

MS. DOMINIC:

Fine. Thank you, Your Honor.

THE COURT:

All right. Thank you so very much.

* * *

COURT AT RECESS

* * *

COURT CALLED TO ORDER

* * *

THE COURT:

All right. Thank you. Everyone may be

seated. We have everybody here? All right. All right, uh, in the matter of John Clifford King, Jr., number 2023-2124 ...

MR. SCHRUMPF:

Senior.

THE COURT:

Oh, senior. Sorry. Versus Renee Amos, this matter came to trial today. The Court has heard from all witnesses, uh, all counsel have had the opportunity to present their case and the Court finds as follows. The burden of proof in a matter of this nature rests, of course, on plaintiff to prove by a preponderance of the evidence that indeed what they claim occurred, occurred. And in this matter, the claim was that Ms. Amos failed to, uh, one (1) committed fraud in allowing someone to commit a transfer of title of a vehicle, uh, without the proper party being present. There were some allegations of forged signature, allegations of negligence, etcetera made. The Court finds, uh, however that the evidence showed as follows. One (1), the Court finds that Mr. King was indeed apparently in New York and New Jersey on September 7th of 2021. That he was

indeed not in Lake Charles. His testimony and his wife's testimony, uh, is irrefuted and undisputed that that's indeed where they were. The Court finds as a matter of fact that he is not, uh, Flash from Marvel Heros, and cannot quickly proceed somehow from that far away from ... to Lake Charles, execute a title, execute a transfer, and then go back. I find basically that his testimony is the Gospel truth. That he got up that day. He went and worked out, got a smoothie, went to his job and, uh, spent the evening apparently celebrating the upcoming nuptials with his bride. I find, uh, Mrs. King testified to the same. They got up that day. They were in New York and New Jersey and he was not in Lake Charles. On the other hand, I find that, uh, Ms. Amos' testimony, uh, is also undisputed. Mr. King freely admits he wasn't there. He don't know what happened in her home whenever the transfer of the document ... on the document was, uh, occurred. And her testimony is that she, uh, was contacted; that Ms. Colston and, uh, some man came, showed IDs. She verified their IDs. She notarized their signatures and that's the

extent of it. She does not have a truly independent recollection of exactly what everybody looked like but she testified that it is her custom and practice to require that everyone show her an ID. She verifies it and that if ... if anything is "fishy" in the sense that someone doesn't have an ID or the ID is obviously, uh, doesn't match, or if there's already a signature on a document that she did not witness, she contacts the Justice of the Peace regarding the matter. Her testimony is this is indeed how she's done for, I can't remember, I think she said twenty (20) something years. I don't know. A long time. Not trying to make you older than you are, Ms. Amos.

MS. AMOS:

Thank you.

THE COURT:

But, she was very, very adamant in that she does not deviate from her practice. She does not recall, sitting here today, if it was Mr. King or not and has no reason to argue that it was ... could indeed have been someone else utilizing a fake ID. The Court ... the

one (1) missing link that the Court really needed so that the Court can make a ... a ... a decision here is Ms. Colston. She's the missing link, so to speak. Ms. Colston isn't here to testify. Seems to me, she'd of been the one. You get her in here. You put her on the stand. Who went with you? Who was there? What happened? I find it of no moment that a Notary who does, I think you know, she testified thousands of these things over the years, that a Notary who does this doesn't specifically remember everything about a particular deal. They just know their protocol. Ms. Colston, however, this would be a rather significant and unique event in her life and, uh, she would be the party who would be best situated to tell us what in the world happened that day, who was with her, uh, etcetera. All right? So it's one of those cases where the Court doesn't have to think that a plaintiff is the only one telling the truth, or the defendant is the only one telling the truth, uh, it's one of those cases where the Court can find that I believe everybody's telling the Gospel truth in here today. I think

Mr. King wasn't lying about where he was. I think Ms. Amos isn't lying about what her protocol is and that two (2) people showed up, a man and a woman. She checked their IDs, uh, and executed the documents. If Ms. Colston was here, I think that's the one we'd have to decide or we'd be calling her the proverbial liar, liar, pants on fire or not, okay? That all having been the case, uh, the Court finds that ... let me grab the pleadings. The Court finds that the plaintiff has failed to prove by a preponderance evi ... of the evidence that defendant undertook to provide illegal notarial services to Charmaine Colston, intentionally notarizing a false title transfer and a false bill of sale for the subjects in this matter. Additionally, the Court finds that plaintiff failed to prove by a preponderance of the evidence ... preponderance of the evidence that defendant failed, uh, to exercise whatever professional notarial powers and evaluation skill that needed to be done in executing this matter. In short, the Court finds that plaintiff failed to prove by a preponderance of the evidence

that, uh, defendant Amos did anything incorrect in processing this matter and the Court finds that her explanation of what occurred to be reasonable and that indeed, Ms. Colston's testimony could have swayed the Court one way or the other. That being the case, judgment in favor of defendant. Costs of court awarded to defendant and that is the judgment in this matter. Ms. Dominic, please prepare a judgment and circulate same in this matter. Counsel, any questions?

MR. SCHRUMPF:

No. I just want to make sure all of the offerings were proffered.

THE COURT:

All ... all offerings were proffered.

MR. SCHRUMPF:

Whatever wasn't admitted into evidence is proffered.

THE COURT:

Yes. All is proffered. And I ... and I'll speak to that quite frankly. All, uh, all documents that were made by proffer that this Court did not allow to be entered into evidence, the Court believes were all moot due

to the fact that the Court did not feel those documents were necessary to prove that Mr. King was in New York and New Jersey. In fact, Mr. King's testimony and Mrs. King's testimony were more than sufficient to convince the Court that, uh, Mr. King was indeed in New Jersey or New York on September 7th of 2021. Now, do we have any other questions from counsel?

MS. DOMINIC:

Just to, uh, clarify Your Honor. The judgment is in favor of the defendant and, uh, court costs in our favor. Correct?

THE COURT:

Yes.

MS. DOMINIC:

Thank you.

END OF TRIAL

STATE OF LOUISIANA :

PARISH OF CALCASIEU :

REPORTER'S PAGE

COPY

I, **Karey J. Bang, Certified Digital Reporter (1072019)** for the Lake Charles City Court in and for State of Louisiana, do hereby state on the Record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) and/or ellipsis (…) have been used to indicate pauses, changes in thought, and/or talk-overs; that same is the proper method for a Court Reporter's transcription of proceeding, and that the dashes (--) and/or ellipsis (…) do not indicate that words or phrases have been left out of this transcript.

Lake Charles, Louisiana; December 23, 2024.

KAREY J. BANG
Certified Digital Reporter

STATE OF LOUISIANA :

PARISH OF CALCASIEU :

REPORTER'S CERTIFICATE

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I, Karey J. Bang, Certified Digital Reporter (1072019) for the Lake Charles City Court in and for State of Louisiana, do hereby certify that this testimony was reported to Shelia Hasty in the digital reporting method, was prepared and transcribed by me or under my direction and supervision, and is a true and correct transcript to the best of my ability and understanding; that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board, or by the Supreme Court of Louisiana, and that I am not related to counsel or to the parties herein, nor am I otherwise interested in the outcome of this matter.

Lake Charles, Louisiana; December 23, 2024.

KAREY J Bang
Certified Digital Reporter