

**UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS**

**Civil Action No. 3:22-CV-9**

**JOE BLESSETT  
PLAINTIFF**

**VS.**

**United States Courts  
Southern District of Texas  
FILED**

**JAN 19 2022**

**Nathan Ochsner, Clerk of Court**

**GREGG ABBOTT  
KEN PAXTON,  
TEXAS OFFICE OF ATTORNEY GENERAL CHILD SUPPORT ENFORCEMENT  
DIVISION,  
STEVEN C MCCRAW,  
TEXAS DEPARTMENT OF PUBLIC SAFETY  
XAVIER BECERRA  
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
ANTHONY BLINKIN  
U.S. DEPARTMENT OF STATE  
UNITED STATES  
CITY OF GALVESTON  
SINKIN LAW FIRM  
DEFENDANTS**

**Amended Injunctive Relief, Estoppel of all Department of Health and Human  
Services Administrative Collection and Enforcement against JOSEPH C  
BLESSETT**

Cause of action equitable estoppel<sup>1</sup>, U.S. Supremacy Clause Article VI, Clause 2, 42 U.S.C. § 1983, 18 U.S.C. § 241, 18 U.S.C. 242, 18 U.S.C. 245 and all the fruit of the poisonous tree. We request the grant an order equitable estoppel against the Department of Health and Human Services to stop Title IV-D Administrative Collection and Enforcement against JOSEPH C BLESSETT under 42 U.S. Code § 652, 42 U.S. Code § 654, 42 U.S. Code § 666 and 45 CFR § 303.72 Requests for collection of past-due support by Federal tax refund offset.

The Texas Title IV-D agency began to apply Title IV-D enforcement as early as 1999 without Plaintiff's acceptance of the federal government nationwide child support program terms. *Plaintiff has no obligation to accept the terms of Title IV of the Social Security Act nationwide program or provisions enforced by the Hague Convention for child support.* As a result, the Defendants have been unable to produce any instruments required under 42 U.S.C. 654(12) to support their claims for a financial obligation. Under their Cooperative Federalism contractual requirements, Xavier Becerra, the Department of Health and Human Services, Ken Paxton, and the Texas Attorney General Child Support Enforcement Division (OAG) must abide by the contract terms of Title IV-D of the Social Security Act. Ken Paxton has admitted through tacit conduct that the Texas Attorney General Child Support Enforcement Division does not have the instruments required under 42 U.S.C. 654(12).

Defendants defiantly challenged the Plaintiff's rights as the creditor without a contract or issuance of a signed equitable instrument to the state to enforce their Title IV-D program penalties

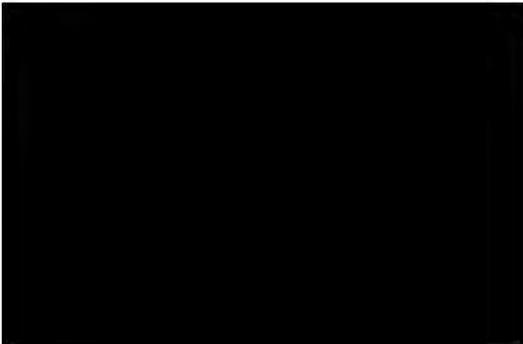
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<sup>1</sup> Equitable estoppel, sometimes known as estoppel in pais, protects one party from being harmed by another party's voluntary conduct. Voluntary conduct may be an action, silence, Acquiescence, or concealment of material facts. One example of equitable estoppel due to a party's acquiescence is found in *Lambertini v. Lambertini*, 655 So. 2d 142 (Fla. 3d Dist. Ct. App. 1995). In the late 1950s, Olga, who was married to another man, and Frank Lambertini met and began living together in Argentina. Olga and Frank hired an attorney in Buenos Aires, who purported to Divorce Olga from her first husband and marry her to Frank pursuant to Mexican law. The Lambertinis began what they thought was a married life together, and soon produced two children. In 1968, they moved to the United States and became Florida residents.

against Blessett. In addition, 42 U.S.C. 654(12) is a public law preventive measure against unlawful conduct by a governmental authority to ensure compliance with the U.S. Constitution's restrictions on any person acting on behalf of governmental authority.

Unless the defendant can prove legal capacity to enforce a Title IV-D contract on JOSEPH CRAIG BLESSETT or show evidence of JOSEPH CRAIG BLESSETT consent to a contractual financial obligation to the State. There is no reason to deny injunctive relief and allow the continued infringement on the Plaintiff's rights.

Plaintiff requests the court grant an order for a permanent Estoppel of all Administrative Collection and Enforcement against JOSEPH C BLESSETT performed by the Department of Health and Human Services.



Jun 18, 2022  
Date

**Certified Estoppel of all Department of Health and Human Services  
Administrative Collection and Enforcement**

I, Joe Blessett, have drafted, read, understood, and certify the attached forgoing Injunctive Relief, Estoppel of all Department of Health and Human Services Administrative Collection and Enforcement against JOSEPH C BLESSETT filed herein as the truth. Each fact alleged therein is true and correct of my knowledge under penalty of perjury.

**FURTHER, THE AFFIANT SAYIT NAUGHT**

[Redacted Signature]

Joe Blessett

SWORN TO AND SUBSCRIBED BEFORE THIS 18<sup>th</sup> DAY OF January 2022

Luis J. Calo Morales

**NOTARY PUBLIC**

My commission expires: January 28<sup>th</sup>, 2024

