

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

Civil Action No. 3:22-CV-9

**JOE BLESSETT
PLAINTIFF**

VS.

**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**

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

JAN 19 2022

Nathan Ochsner, Clerk of Court

**Amended Injunctive Relief, Estoppel of all Texas Office of Attorney General Child
Support Enforcement Division against JOSEPH C BLESSETT**

We request the grant an order equitable estoppel against the Texas Office of Attorney General Child Support Enforcement Division to stop Title IV-D Administrative Collection and Enforcement against JOSEPH C BLESSETT under 42 U.S. Code § 652 (k) DENIAL OF PASSPORTS FOR NONPAYMENT OF CHILD SUPPORT, 42 U.S. Code § 654 State plan for

child and spousal support, 42 U.S. Code § 666 (a)(16) AUTHORITY TO WITHHOLD OR SUSPEND LICENSES, 42 U.S. Code § 666 (b) Withholding from income of amounts payable as support and 45 CFR § 303.72 Requests for collection of past-due support by Federal tax refund offset.

There are valid government overreach issues, separation of power, infringement, with lack of capacity to enforce Title IV-D contract or deprive Blessett of rights and privileges. The Defendants did not act in good faith to abide by their 10th amendment protections, Plaintiff's enumerated amendment protections, Blessett's Commerce Clause protections, and Federal legislated Spending Clause restrictions under Title IV-D of the Social Security Act.

As an individual entity, commerce clause protections are paramount for protecting the Plaintiff's right to uniform commerce and equal application of the rights and privileges as an individual entity. ¹The 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, 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.

¹ The Court delineated three categories of activities that Congress has the power to regulate under the Commerce Clause: (1) "the use of the channels of interstate commerce"; (2) "the instrumentalities of interstate commerce, or persons or things in interstate commerce, even though the threat may come only from intrastate activities"; and (3) "those activities having a substantial relation to interstate commerce, i.e., those activities that substantially affect interstate commerce." US v. Allen, 341 F. 3d 870 - Court of Appeals, 9th Circuit 2003

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 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.

Plaintiff requests the court grant an order for a permanent Estoppel of all Title IV-D Administrative Collection and Enforcement against JOSEPH C BLESSETT performed by the Texas Office of Attorney General Child Support Enforcement Division. Nothing was given to JOSEPH C. BLESSETT from Texas or the state agencies, and nothing shall be returned.



Dec. 18, 2022
Date

**Certified Injunctive Relief, Estoppel of all Texas Office of Attorney
General Child Support Enforcement Division**

I, Joe Blessett, have drafted, read, understood, and certify the attached forgoing Injunctive Relief, Estoppel of all 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 15th DAY OF January 2022

Luis J. Calo Morales

NOTARY PUBLIC

My commission expires: January 28th, 2024

