

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS

Civil Action No. 3:22-CV-9

United States Courts
Southern District of Texas
FILED

JAN 19 2022

**JOE BLESSETT
PLAINTIFF
VS.**

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 AND HUMAN SERVICES

ANTHONY BLINKIN

U.S. DEPARTMENT OF STATE

UNITED STATES

CITY OF GALVESTON

SINKIN LAW FIRM

DEFENDANTS

Injunctive Relief, Equitable Estoppel of Texas Family Code Sec. 158.210 and Sec.232.0022

We request the grant an order to stop future enforcement of Texas Family Code Sec. 158.210 and Sec.232.0022 Suspension or Nonrenewal of Motor Vehicle Registration until the court settlement or jury verdict.

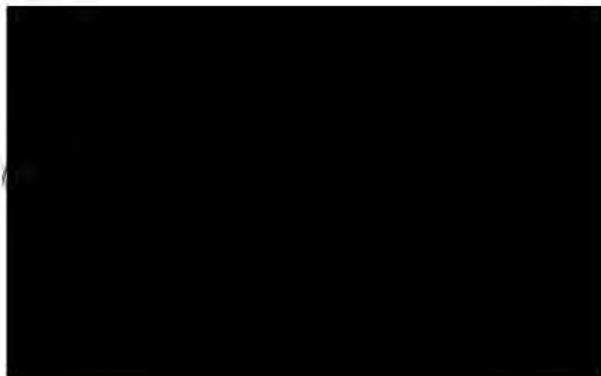
Plaintiff challenged the state codes pursuant to 28 U.S.C. § 2403 as repugnant to the U.S. Constitution and conflicts with federal statutes of Title IV-D of the Social Security Act. Texas Family Code Sec.232.0022 interfere with the freedom and liberty to travel and restrictions on interstate commerce.

Texas Civil Code Sec. 158.210 conflicts with 42 U.S. Code § 653a (d), the statute addresses new hire reporting. The federal law is careful not to interfere with the contract or agreement between the employer and employee. U.S Congress knew that private legal contracts that do not interfere with general public welfare are protected from government infringement under the United States Constitution. Texas has imposed a financial burden on state employers for a voluntary federal program.

The state action is coercive, subjugating employers and employees unwilling to participate in the voluntary federal program. Therefore, there is no reason to deny injunctive relief and allow the continued infringement on rights for state laws that directly conflict with federal statutes and the U.S. Constitution.

The order shall not be interpreted to interfere with existing orders for collection and distribution of child support or Texas Family Code Sec.232.0022 Suspension or Nonrenewal of Motor Vehicle Registration, or present orders already enforced for Texas Family Code Sec. 158.210. However, the order shall be interpreted to prevent other or additional injured parties by Texas Family Code Sec. 158.210 and Sec.232.0022 Suspension or Nonrenewal of Motor Vehicle Registration.

Plaintiff requests the court grant an order for an Equitable Estoppel of Texas Family Code Sec. 158.210 and Sec.232.0022.



Jul 18, 2022
Date

Certified Estoppel of Texas Family Code Sec. 158.210 and Sec.232.0022

I, Joe Blessett, have drafted, read, understood, and certify the attached forgoing **Injunctive Relief, Equitable Estoppel of Texas Family Code Sec. 158.210 and Sec.232.0022** filed herein as the truth. Each fact alleged therein is true and correct of my knowledge under penalty of perjury. A copy of this document will be attached to the Complaint and Injunction for Declaratory Judgment Trial by Jury and served as per Federal Rule of Civil Procedure 4.

FURTHER, THE AFFIANT SAYIT NAUGHT



Joe Blessett

SWORN TO AND SUBSCRIBED BEFORE THIS 18th DAY OF January 2022

Luis J. Calo Morales

NOTARY PUBLIC

My commission expires: January 28th, 2024

