

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA

DONALD SEOANE

Case No:

Plaintiffs,

v.

NOEL AARON MARQUIS aka  
Markking41 aka  
markking41\_loves\_nancy

Defendants.

**COMPLAINT AT LAW – VERY CONTROVERSIAL FAMOUS MALE  
ADULT MOVIE STAR CONVICTED FELON THAT’S RUNNING FOR  
FLORIDA’S GOVERNOR VS CUSTOMS AND BORDER PATROLS  
NOEL A MARQUIS**

Plaintiffs, Donald Seoane aka Donny Long aka Donald Trunk aka donaldseoane.com, individually and as natural Father to minors A, J, S and A, L, S and S, F, S, all minors, THAT IS RUNNING FOR FLORIDA’S GOVERNOR complaining of Customs and Border patrol officer working outside of the color of law of his job’s immunity description, Closeted TRANSEXUAL gender confused LGBT member Defendant Customs and Border patrol’s Noel A Marquis aka Markking41 aka markking41\_loves\_nancy that’s dating a porn star Prostitute illegal immigrant from Thailand and abusing her kids, bullying her husband, libeling, defaming, making false reports to

DCF and causing a tortious interference in his divorce and custody case and more using his clout to damage Plaintiff's. Noel not only online has made threats to Donald but with his many connections as law enforcement and using his job description's powers to commit and cover up a swarm of felonies that him and Nantita have committed, and Donald Seoane states as follows:

## **V. MORE FACTS, COUNTS DEFENDENTS AND MORE**

Plaintiff says, publishes and declares here and now that Florida's agencies and institutions by and through her officials, officers and agents, acting under color of law have knowingly and others have persistently denied and withheld from the Plaintiff an obligation and duty of protection of the laws as to his person and liberty, a reciprocating duty for Plaintiff's obligation of obedience, although within their power to do so. Plaintiff has made public all the proof online here

<https://linktr.ee/victimofthesystemofwomen> and here

<https://www.youtube.com/watch?v=hYh942JsFTY> and in other

places before all his evidence was silenced and covered up by

judges and officials and has since been silenced by them in an

unconstitutional gag order and says that by and through Florida's

agents, officers and official, including FEMALE man hating leftist extremist feminist judges and many more FEMALES, Lesbians and Transexuals leftist and in multiple sworn Formal complaints showing probable cause received by her law enforcement and agencies with prosecutorial powers alleging acts of state created danger via affirmative acts of her state officials towards him and his 3 young children have been deliberately and persistently ignored, including the mother Nantita Seoane of 218 London Drive Kissimmee Florida 34746 and Noel both physically, sexually and mentally abusing his children that Plaintiff's attempts at judicial relief through her state via Florida' s judicial branch has turned entirely against the Plaintiff by delaying the due course of those remedies, frustrating or denying him meritorious redress, relief and a proper remedy, that Plaintiff attempts at judicial relief in her district to remove said state created danger or to make him less vulnerable to the danger turned entirely against the Plaintiff by delaying the due course of those remedies, frustrating or denying him meritorious redress, relief and a proper remedy, and covering up the mothers abuse and her and her lawyers compulsive lies and perjury and have turned everything onto the father which has reported it to her Judicial Qualifications Commission, deliberately refused to investigate, violations of the Judicial Code of Conduct

submitted by the Plaintiff, that her State Inspector General's Office, Department of children and families, Child Protection Team, Osceola county sheriff's office, Help Now Shelter, Several tax payer funded attorney's, The state attorney's office, and many more have deliberately refused to investigate, committed acts or perjury, conspiracy, deprived plaintiff of several constitutional rights and more and is probable cause of corruption in her executive branch submitted by the Plaintiff. Plaintiff claims & declares that his grievances were confronted by state actors and others in a systematic pattern, scheme or manifest conduct of prejudicial bias in lieu of impartialness, denial of protection in lieu of protection, deliberate or recklessness foreclosure or unlawful delay of meritorious remedies in lieu of a due or adequate remedy and that each of these grievances involved judge Holly N Derenthal and judge Christy C Collins of her state and that the pattern and scheme being so far from the duties, obligations and oaths of the wrongdoers and manifestly incompatible with the law, that a single plan and general conspiratorial objective to frustrate or deny Donald of due and proper redress, relief, remedy vindication and protection of the laws when such grievances involved judge Holly N Derenthal and judge Christy C Collins was patently obvious and Concerted and Noel has been a part of all of it and influenced all of

it for 2 years using his clout as a federal police officer with Customs and Border Patrol. Plaintiffs alleges that if the sworn formal and public corruption complaints alleging acts of state created danger had been promptly investigated, in good faith, pursuant to the duties and obligations owed to Plaintiff's, they would be less vulnerable severe emotional distress and physical, mental and sexual harm from those types of abuses. Plaintiff declares that he has repeatedly plead for protection by her state and have been answered by repeated injury marked by every act which defines Tyrannical activity in the public offices of Florida. Plaintiff publishes and declares that by and through her agents, as applied to Plaintiff, that Florida's institutions and agencies have been usurped and managed as an instrument of oppression and her law enforcement and prosecuting agencies has refused to perform a vital duty they swore to undertake in denying Plaintiff protection and has thus caused a fundamental breach in the social compact or contract in which the Plaintiff is a beneficiary, and such breach, Plaintiff declares, annuls him of all & any obligations of obedience to her laws until such breach is cured.

a. Plaintiff's declares, claims and shows that there was a

general conspiratorial objective, shared motives or agreement to frustrate, delay or deny him and his children of a due & proper remedy, redress, physiological vindication, adequate and required relief and protection of the laws in a pattern and scheme of prejudicial bias in lieu of impartialness, denial of protection in lieu of protection, deliberate or reckless foreclosure or unlawful delay or frustration of meritorious relief or a proper remedy in lieu of due or adequate relief and redress and that these objective were met by this pattern and scheme when it involved or concerned Defendant Noel and judge Holly N Derenthal and judge Christy C Collins and the objective involved delaying, denying, preventing or frustrating Plaintiffs due and proper redress, a proper remedy, relief, and psychological vindication in the protection of the laws if there was a possibility, likelihood or certainty that criminal prosecution could be brought

against many state officials including judge Holly N Derenthal and judge Christy C Collins for assisting in perjury and committing conspiracy and more in such relief thereof his grievances and in furtherance thereof engaged in such pattern & scheme, with malice or recklessness.

b. At all times herein, the Plaintiff does not concern himself with any mere transient or light causes that delayed, denied or frustrated his due remedy or vindications in good faith, but rather, persistent acts of the same being manifestly incompatible with the law and a manifest injustice to Plaintiff and that measured against the experience, duties and obligations of Defendants and all of the astounding circumstances, bad faith was apparent and obvious.

c. The Plaintiff declares and states that in conjunction with the acts above, state actors in the United States Florida corrupt government systems, did engage, join, combine or participate in this general conspiratorial

objective, shared motives or agreement by strategically utilizing skillful judicial stratagem and experience to delay, deny, prevent or frustrate Plaintiff's due and proper redress, relief, vindication in protection of the laws if there was a possibility, likelihood or certainty that criminal prosecution could be brought against many state employees including Noel influencing and colluding with judges judge Holly N Derenthal and judge Christy C Collins and many more and in furtherance thereof engaged in the same pattern and scheme or conduct of such pattern and scheme in concert with Florida state actors to frustrate, delay, or deny Donald of said due and proper redress, vindication and protection of the laws.

d. Plaintiff's claims and declares that as to certain

Defendants as

e. more fully claimed below, their individual actions in the



main conspiratorial objective essentially operated as a systematic cover-up, concealment, delay of, deep-sixing, frustration or denying of any grievances which involved or were related to Noel and others including judge Holly N Derenthal and judge Christy C Collins if there was a possibility, likelihood or certainty that criminal prosecution could be brought against Noel and judge Holly N Derenthal and judge Christy C Collins and others in Plaintiffs relief thereof his grievances.

f. Moreover, Plaintiff's declares and claims that he in good faith and with clean hands sought to redress what he claims was a fundamental breach of a social compact or contract in refusing to investigate allegations of state created danger for him and his children and at every turn, whether his grievances were through Florida's executive branch related to such state created danger or which would prove such

a danger "judicially" in Florida's district, a regime of actors in both sovereign states engaged in a pattern, scheme or conduct in utilizing tax-payer funds as an instrument of oppression in denying their undertaking they owed to Plaintiff according to their legal duties and obligations to deny him meritorious relief, remedy and redress.

g. Plaintiff declares that sworn formal complaints not only showed probable cause of state created danger towards him and his children but alleged an inference of a plot to assassinate the Plaintiff's charter in the name of his children, in his alleging state actors "[F]eared liability in official proceedings ... if they did arrest the [Plaintiff]."

This inference being shown because liability for the illicit acts to imprison the Plaintiff would not end with Plaintiffs arrest and the status of the state actors who received the

sworn formal complaints were prudent and experienced enough to know that Plaintiff showed a heightened risk of state created danger that was not only tailored to unlawful imprisonment into prisons which they had already falsely imprisoned him before, but also necessarily dangerous places, but the suspicious efforts to do so.

h. Plaintiff says the failure to investigate, arrest, indict or correspond with the Plaintiff when he made good faith attempts to alert the state of corruption and state created danger that would affect the public trust, integrity and confidence in the administration of justice caused overwhelming distress to the Plaintiff - for he waved his flag alerting that the British were coming, but when state danger reached the shores of Plaintiff's liberty, they ignored it.

i. Plaintiff requests immediate protection of the laws

under the United States Constitution and due to the severity of the acts alleged herein, Plaintiff requests that this court be amendable to Plaintiff and bypass any procedural bars as it would work a manifest injustice to deny relief under the circumstances where a threat to life has been alleged as the children's mother has been baker acted for attempted suicide and hospitalized in a mental hospital for several days and also threatened to murder the children and kill herself – and to immediately use its Federal hand to cure a breach of the social compact or contract and bring justice within the borders of the State of Florida for Florida's fundamental refusals to do so.

j. To prove this declaration and his claims, let these sworn facts under penalty of perjury be submitted to a candid world and this court, to expose this Tyranny and all of its Oppression.

### **JURISDICTION**

k. This action arises under 28 U.S.C. § 1331, 28 U.S.C. § 1367, 28 U.S.C. 1343, 28 U.S.C. § 2201, 42 U.S.C. § 1983.

1. Jurisdiction is proper under 28 U.S.C. § 1391(a)

because at least one of the Defendants are residents of the Federal Middle district and the transactions or events at issue herein did occur within said Federal district.

**FLORIDA CONSTITUTION AND THE UNITED STATES**  
**CONSTITUTION**  
**GENERALLY**

2. The State of Florida recognized that " PREAMBLE We, the people of the State of Florida, being grateful to Almighty God for our constitutional liberty, in order to secure its benefits, perfect our government, insure domestic tranquility, maintain public order, and guarantee equal civil and political rights to all, do ordain and establish this constitution. " See Florida constitution 1868.

3. The People of the State of Florida are entitled to a civilized society.

4. The People of the State of Florida are also entitled to a society free from "Government Corruption, Abuse, Oppression and Tyranny."

5. The Plaintiff is a Florida state citizen and one of the people thereof.

6. The Plaintiff is a citizen of the United States of America.

7. As such a citizen, every Defendant herein owed and continues to owe to Plaintiff a legal duty and obligation in the protection of the laws, to his person and liberties and to protect against any acts of state created danger unlawfully created by any of Florida's officials, agents or officers - and a Government which knowingly and persistently denies or Withholds from the Plaintiff such protection when within its power, releases him from the obligation of obedience to Florida's laws.

8. John Locke's Second Treatise, Chapter VIII. Sec. 97;

"[A]nd

9. thus every man, by consenting with others to make one body politic under one government, puts himself under an obligation, to every one of that society, to submit to the determination of the majority, and to be concluded by it; or else this original compact, whereby he with others incorporates into one society, would signify nothing."

10. On July 4th, 1776, in a unanimous Declaration of Independence it was said; "[W]e hold these truths to be self-evident, that all men are created equal, that they are endowed by their creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness. **That to secure these rights, Governments are instituted among Men,** deriving their just powers from the consent of the governed."

11. The protection of Plaintiffs unalienable and/or fundamental rights under Florida's constitution is one of the privileges and benefit of a governmental society. See John

Locke's Second Treatise.

12. Following the American Civil War and the ensuing success by the Union, soon followed the introduction and ratification of the 14<sup>th</sup> Amendment providing protection for all who was previously without that protection under the constitution. See *Dred Scott v Sandford*. 60 US 39319 How. 393-Supreme Court.

13. Under the 14<sup>th</sup> Amendment, ratified on July 9<sup>th</sup> , 1868, all citizens born and naturalized in the United States are entitled to protection of the laws.

14. Defendant herein took an oath to support and defend the United States Constitution.

15. Defendant who took an office to support and defend the U.S. constitution and/or the Florida Constitution is bound by contract with the beneficiaries of the State of Florida's and United States Constitution as a result of said oath.

16. The Plaintiff is a beneficiary of the "United States



Constitution and Florida constitution"- the social compact(s)  
or contract(s).

17. The Florida and the United States Constitution was erected for the benefit of the Plaintiff to secure his rights, liberties and person as a state citizen of Florida & citizen of the United States.

39. The protection of the Plaintiffs person, property and liberty under the laws of Florida and its constitution by the state is one of the reciprocating duties of the State of Florida in return for the Plaintiff's obligation of obedience to her (Florida's) laws.

**GENERAL ALLEGATIONS AND REVELANT STATUTORY  
AUTHORITY**

18. The State of Florida and each Defendant herein has a legal duty and legal obligation to provide protection of the laws and protect its citizens from state created danger arising from the unlawful affirmative acts of Florida state actors thereof the State of Florida.

19. Each Defendant herein is bound by this legal duty and obligation by contract as a result of their oath to support and defend the United States Constitution - erected for the benefit of the Plaintiff and Florida state citizens to secure their rights.

20. Each Defendant were bound by their oaths at the time of each of the acts declared in this claim and declaration and at all times herein this claim and declaration are still bound.

21. Because of the knowing and persistent denials in refusing to provide Plaintiff protection to person and liberty - a duty within the social compact - Plaintiff alleges that his performance, any legal obligation and any duty to remain obedient to Florida's laws is terminated or annulled - until such breach is cured or remedied.

22. The legal duties and obligations of each Defendant herein included providing protection of the laws to the Plaintiff, a proper remedy, psychological vindication, adequate relief or a proper redress to his petitions or any grievances on paper brought to their attention.

23. Each Defendant herein did knowingly, with malice or reckless indifference to the rights of the Plaintiff did refuse to provide Plaintiff a proper remedy, psychological vindication, adequate relief or proper redress to his melitorious grievances brought to their attention and did so without any justification in the law in their failure to do so and such failures to do so were manifestly incompatible with the law and/or a manifest injustice to Plaintiff.

24. The People of the State of Florida did delegate their authority to their state legislatures to make, procure, draft, vote on, sponsor, write or pass laws locally and federally.

25. The Plaintiff exhibited good faith when attempting to utilize such protection of the laws provided by his State's legislature for redress, relief and a proper remedy to reverse, remove or make himself less vulnerable to the alleged acts of state created danger by Florida state in which he alleges caused a fundamental breach of the social compact or contract actors and has been unsuccessful due to the denials, delay or frustration of a proper remedy, psychological

vindication, adequate relief or proper redress to his meritorious grievances.

26. Noel has caused and participated in what many officials have done persistently disregard, withhold, deny nor refuse to arrest, indict, criminally refer or investigate sworn formal Complaints submitted under oath and under penalty of perjury showing probable cause that acts of state created danger has been or is about to committed unlawfully by Florida state officials within their jurisdiction against a Florida Citizen.

27. Noel having actual or constructive knowledge of sworn formal complaints, emailed, court motions, DCF complaints and much more by showing probable cause of state created danger that was being committed or was about to be committed did without justification, knowingly & persistently, with malice or reckless disregard for the rights of the Plaintiff did acquiesced, ignore, withheld, denied,

refused to arrest, investigate, criminally refer, indict or file\_ warrants or procure the same against state officials who based on probable cause as shown in Plaintiff's multiple sworn formal complaints, court motions and DCF complaints and more were committing or were about to commit unlawful acts of state created danger in their jurisdiction against Florida and U.S. Citizen.

26. Noel did with bias and prejudice, malice or reckless disregard for the rights of the Plaintiff, and in conspiracy, did knowingly and persistently, without justification, disregard controlling authority, the law & facts & refused to provide a proper remedy, redress, vindication & relief to his meritorious grievances about the mothers abuse of Donald's children and instead conspired to defame, libel and slander Plaintiff with lies and deprive him of his constitutional rights.

28. Plaintiff alleges that at all times herein Noel failed to perform in honor, in good faith and acted in bad faith,

contrary to his duties and obligations owed to Plaintiff with malice or reckless disregard for the rights of the Plaintiff knowing that it was contrary to the security of the rights of the Plaintiff that Noel swore to protect and defend.

29.

### **INTRODUCTION**

I am filing this lawsuit after years of being a victim of the corrupt system and I have decided to also run for Florida governor as well due to this lawsuit and many others needing to be filed not only for fair legal justice for myself and my 4 children but for every single male and female human being and child that has been discriminated against, railroaded and or put in serious danger in the legal system, any and all corrupt government systems, these systems corrupt employees all the corrupt government agencies that work tightly with them from DCF, all the way up to the governor and his offices female employees and staff and many many more. For the last 2 years or so myself and my children have been the victim of not only my wife Nantita Seoane that is a compulsive

lying for Thai Bhudda porn star prostitute that had me falsely arrested for domestic violence and admitted to committing perjury to get an injunction in front of a jury that impeached her as a witness and deliberated a not guilty verdict within ten minutes but also I have been the victim of countless man hating Misandry Feminists, lesbians and gender confused transsexuals which are all listed in my federal lawsuit case number 6:2023cv01906 that are all committing countless felonies including felony conspiracy, violation of oath of office, official misconduct, covering child abuse and on and on and on you will read more about below.

One of these people is a cuck, porn addicted transsexual gender confused fetish addict man that also had adult profiles on adult fetish websites named Noel A Marquis that has a fetish to share sperm of other men with women and hires pornstar prostitutes online like my drug addicted illegal Thai immigrant porn star prostitute wife Nantita Seoane aka Tiktok user @nancys\_28 aka Heather Swallow of 218 London Dr Kissimmee Florida.

Noel is one of my wife's porn fans back since January on Tiktok which was 3 months before my separation and false arrest. He is not only one of the people involved in the conspiracy to have me falsely arrested and falsely imprisoned all in an attempt to get one

of my wifes world famous deepthroating Fellatio throatpies that she is famous in hundreds of adult movies all over the internet for but has also used his job connections, Clout and reputation with Customs and Border Patrol to assist my wife with law enforcement and the Osceola County Sheriff office for her not to be criminally charged with countless felonies including child abuse and he assist her not to get deported. Noel has assisted in the theft of me and my children's belongings located at 218 London Dr Kissimmee Florida as well as the destruction of me and my 12 year old full custody daughters belongings. He has been seen by neighbors throwing our belongings away in the trash many times.

Also him and his reputation and connections have also caused Countless people to commit a lot of the crimes listed in my recent criminal complaint and civil complaints as well as the federal lawsuit against 3 state court judges listed above. Seoane vs Derenthal. Case number 6:2023cv01906

Noel A Marquis 425 Kestrel Dr Groveland, FL 34736 as for his wife named Grecita G Marquis at 9834 Royal Vista Ave, Clermont FL 34711 she was originally going to be a defendant to this case because there was a fight between Noel and Nantita Seoane and Noel's wife Grecita in front of my 3 and 4 year old children and their



children Zachary, Christine, and Peanut at one of their houses where the children stated that Grecita was thrown from the house and they were mentally traumatized having to hide upstairs under the beds while things were thrown and the fight, yells and screams went on till they could get her out of the house. Note Nantita has a long history of being violent and domestic violence towards me and my children and was even baked acted and hospitalized in a mental hospital for 3 days for attempted suicide during my false arrest. Grecita should get an immediate injunction against Nantita on behalf of her kids and herself towards not only Noel but Nantita and I will be more than willing to legally assist and sign any sworn affidavit with truth that she needs and provide countless other sworn documents from others that have been witnesses to Noel and Nantita's abuse!

I just found out that Grecita is actually a victim and terrified of Noel and is a victim as well. It seems that Grecita is a not a participant of Noel and Nantita dirty and disgusting sex acts, pornography business and abuse of my children which reminds me that Noel has been a willing participant countless times in the promotion of porn star prostitute Nantita's online videos and promotions. At this time it doesn't seem Noel and Nantita have Grecita participating in there

porn business online and I am unsure if Noel has their children involved but he has been around when Nantita has twerked naked making adult videos in front of my 4 and 5 year old. I believe Grecita and her children are possibly victims as well of Noel as he is clearly a power freak that makes empty cowardly threats while hiding behind his keyboard like he did to me but when confronted he runs away like a little girl even on Tiktok. See Noel thought he was smart cheating on his wife and 3 kids with my wife for the past 2 plus years and wasn't going to get caught but it seems once his wife found out she filed for divorce on 12/18/2022 and then Noel was so smart that he thought moving into a man's house and taking up his sloppy seconds from my compulsive lying criminal Thai washed up porn star prostitute drug addict wife with baggage and then taking my kids and colluding with judges, DCF, police and on and on and on and using his job title with Customs and Border Patrol and doing this all while he is married as well in a contested divorce with 3 kids of his own but frankly he has to be one of the stupidest men alive cause not only this was done all because he was a fan of my wifes porn for years but he was thinking with the wrong head and did it all because he is old looking and fat and can't get a women any other way but paying them and then taking an extremely vulnerable women that he used his job title and CBP,

cups, hats and jackets to try and scare me and make my wife think he was going to save her from being criminally charged for all her crimes and save her from being deported all so he could get some has to be the stupidest thing I have ever heard a man do all to get some. LOL Talk about desperate and putting the wrong head first and over your kids, wife and life! Jeeezzzzz!!! He has never scared me and never will! Men like him are not real men! Noel has had countless face to faces with law enforcement at my house while lying for a supporting my wife and or defending her or himself and using his clout to avoid arrest. He has appeared at countless injunction hearings and court dates in my divorce case also using his clout with CBP. Noel is all over DCF reports and records lying for my wife and has used his clout with countless DCF officers to cover my wifes child abuse. Noel has been filming Nantita Seoane twerking naked in front of the children as well and this also has been covered up by CPT, DCF and the Osceola County sheriff office but there is video proof of it from child testimony.

It's all going to come back on him now and hopefully justice and god prevails and in the end I will get the full custody of my two other children back so they can be back happy and safe with me and my fiancé and 5 month old and 12 year old daughter I have full

custody of like they were before for countless months that me and my daughter have raised those two other children 4 and 5 years old since birth that have been illegally and wrongfully been taken from us because of Noel and all his corrupt connections that hopefully justice will be served on all of them soon enough as well in my other federal lawsuit or other legal ways.

I would be more than willing to testify in person in their ongoing divorce case and in their lawsuit they are defendants where Noel has lied and committed felony perjury on his sworn statements which I have proof of. I would be more than happy to assist in the criminal prosecution of him for his crimes as well. I would like her to testify as a witness in my cases as well about the danger that Noel is around children like me and countless others I have can testify to in her cases. I want to state here to make sure she is aware that Noel is going to do everything once this is filed to stop this and block Grequita from contacting or working with me and my large team of Witnesses, including neighbors and children also I have as witnesses. I even have videos of the children disclosing how Noel has punched them in the back and hit them in other places and done tons more illegal and child abuse and child endangerment things to not only my kids but Grequita and her kids also! Noel

knows he is doomed with me testifying in his divorce **Case #:** 35-2022-DR-003306-AXXX-XX lake county clerk Florida the facts against him and his kids and PLEASE Grecita don't bow into him or be scared of him and stand strong as many of us here in the community are here to help you if that's what you need. We are behind you and your children if you didn't mean to cause my children harm and are truly a victim of Noel like we are!

Noel has not only been beating my son but also been sleeping in the bed with my 4 year old daughter for over a year now which is totally inappropriate. Noel has libeled and defamed me for almost two years now on Tiktok calling me a women beating sex trafficker and has also made public threats inciting violence against me and also been telling my son that daddy bad and daddy beats mommy and daddy needs to be beaten. Noel and Nantita use Customs and border patrol cups, hats and jackets in Tiktok videos to try to intimidate and threaten me online and many times right after Noel gets the police or other corrupt officials to cover their crimes and what not. Noel has threatened me to be federally criminally charged as well on Tiktok on my profiles comments.

Noel after assisting and participating in a felony conspiracy and

coverup of my two younger children abuse to blame me and make me look like a false reporter all to cover him and the mothers abuse and take my custody away he is currently spending most of his time with my kids and beating my son and sleeping with my daughter and who knows what else. I do know after talking to someone that knows Grecita that she is deathly afraid for her safety and her children safety around Noel. Customs and Border patrol should be ashamed of themselves for hiring such a desperate abusive fool and they should fire him immediately and criminally charge him and Grecita should seek assistance for her and her children because unlike my fake domestic violence wife Grecita and her children seem to be real victims!

Noel has been at most of my court hearings and I do believe has been using his connections and pull to have not only corrupt police but also judges, DCF, CPT and more and helped influenced them to do all the illegal things they have done to me and my kids. Noel has participated in false documentation to DCF as well. Noel has helped cover up 4 child consoler reports and the counselors sworn statements. Noel is also good friends with well criminally documented and charged crackhead drug trafficker child abuser Michelle Gilliam of 252 Windsor Dr Kissimmee Florida that has

been arrested for a swarm of drug charges and even child neglect that my wife calls mom and is best friends with that was also part of the plan to have me falsely arrested and falsely imprisoned and steal my house, wife and kids as she even admitted in DCF reports to trying to get my wife to leave me many times. Note not only has DCF left my kids in this women's crackhouse for 3 days during my false arrested and lied and said they background checked her but my two younger children out of my four are currently in that house everyday with her smoking drugs in front of my kids in the same room. This women is also smoking drugs in front of Noel's 3 kids also as he brings all the kids over to this women's house with Nantita. I am also aware that Noel has serious mental problems from being in the war veteran and I personally think an injunction should be filed for and granted towards at least his children and mine if not all children just for his mental problems as that is grounds for one to be granted based on his current outrageous behavior around children as I know a man that just had one put against him being a war veteran with PTSD.

I ask this court and CBP how it is a married federal government employee for CBP can have a personal and sexual relationship with an illegal Thai immigrant porn star prostitute that's not only

violating countless terms of her Visa but has also committed countless felonies from perjury to fraud and much more and all has been covered up with the assistance of this federal employee's connections with CBP ???

## I. CLAIMS

30. This is an action pursuant to 42 U.S.C. §§1983 and 1985 and many others below and it claims

1. "Defendant Noel either caused mental damage to my children and or conspired with state court judges and several tax payer funded lawyers and other corrupt actors all acting under color of state law to deprive father and his 4 minor children of their
2. **Due Process (Fifth and Fourteenth Amendments):** The right to due process of law ensures that individuals are provided a fair and impartial tribunal. These judges and others displayed bias, and interfered with the fair judicial process and it undermined the due process rights of the parties involved in plaintiff's cases.



3. **Equal Protection (Fourteenth Amendment):** The Equal Protection Clause prohibits discrimination based on certain protected characteristics, such as race, gender, or religion. These judge's and others bias are motivated by unlawful discrimination, it violates the equal protection rights of the affected parties.
4. **First Amendment (Free Speech):** Noel and his Clout and others restricted a litigant's freedom of speech or expression during court proceedings due to bias, it violated the litigant's First Amendment rights to free speech and petition.
5. **Sixth Amendment (Right to a Fair Trial):** The Sixth Amendment guarantees the right to a fair trial. A biased judge and others undermined this right by not providing a neutral and impartial forum for the parties.
6. **Fourth Amendment (Protection Against Unreasonable Searches and Seizures):** a judge's bias has led to unreasonable search or seizure orders, which is a violation of the Fourth Amendment.
7. **Eighth Amendment (Protection Against Cruel and Unusual**

**Punishment):** In criminal cases, bias by a judge may result in excessively harsh or unusual sentences, which can infringe upon a defendant's Eighth Amendment rights.

8. **Fifth Amendment (Protection Against Self-Incrimination):**

A biased judge may engage in actions that pressure or coerce defendants into self-incrimination, which can violate their Fifth Amendment rights.

9. **Felony Conspiracy** Under Florida Statute Section 777.04(3), a

**“person who agrees, conspires, combines, or confederates with another person or persons to commit any offense commits the offense of criminal conspiracy.**

10. **Felony Fraud** Florida statute 817.034

11. **Organized Fraud** Florida Statute 817.034

12. **VIOLATING OATH OF OFFICE** The fourth federal law,

18 U.S.C. 1918 provides penalties for violation of oath office described in 5 U.S.C. 7311 which include: (1) removal from office and; (2) confinement or a fine.

13. **TREASON** Florida Statutes 876.32 and United States Constitution, Article III, Furthermore, 18 U.S.C § 2381, states that a person guilty of treason against the United States “shall suffer death”

14. **FALSE REPORTS to DCF**, A person who knowingly and willfully makes a false report of child abuse, abandonment, neglect, or abuse of a vulnerable adult or who advises another to make a false report is guilty of a felony of the third degree. §§ 39.205(9), 415.111(5). However, anyone making a report who is acting in good faith is immune from any liability. §§ 39.205(9), 415.111(5)(b) ,CFOP 170-5 24-1 Chapter 24 FALSE REPORTS 24-1. Purpose. “False Reports” are reports made to the Abuse Hotline for the expressed purpose of harassment of an individual/family (e.g., embarrass, make anxious or harm another party, etc.) or for the personal benefit on the part of the reporter or another person (financial gain, obtain child custody, etc.). In contrast to patently unfounded

reports which are reported to the Hotline in “good faith” (i.e., a logical explanation can be ascertained as to why the reporter had reasonable cause to suspect maltreatment), a false report has no initial basis in fact (i.e., facts or information supporting suspicion) and, therefore, is not made in good faith.

15. **Failure to report child abuse to DCF**, Failure to report child abuse to DCF is a third-degree felony. § 39.205(1).
16. **Failure to report a sexual battery**, under § 749.027 is a misdemeanor of the first degree.
17. **Failure to report a case of known or suspected abuse, neglect, or exploitation of a vulnerable adult or preventing someone else from doing so**, is a misdemeanor of the second degree. § 415.111(1).
18. **CIVIL RIGHTS CONSPIRACY IN VIOLATION OF UNDER**  
42 U.S.C. §1983
19. **COMPLAINT FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

20. **COMPLAINT FOR ABUSE OF PROCESS**
21. **ABUSE OF CHILDREN Chapter 827**
22. **775.084. (d) A person who willfully or by culpable negligence neglects a child without causing great bodily harm, permanent disability, or permanent disfigurement to the child commits a felony of the third degree, punishable as provided in s. 775.082, s.**
23. **Abuse of Authority: CBP agents are expected to adhere to their duties and responsibilities as outlined by law and regulations. Preventing a lawful deportation may be considered an abuse of their authority.**
24. **Negligence or Misconduct: Failing to carry out their duties properly and knowingly allowing someone who should be deported to remain in the country could be seen as negligence or misconduct.**
25. **Violation of Immigration Laws: Depending on the specific circumstances, the agent's actions might also be considered a violation of immigration laws if they knowingly obstruct the lawful deportation process.**
26. **Conspiracy: In some cases, if an agent is involved in a conspiracy with others to prevent a lawful deportation, they could face charges related to conspiracy, which is a criminal offense.**
27. **Obstruction of Justice: If their actions are deemed to be knowingly interfering with the lawful deportation**

**process, they might be charged with obstruction of justice, which is covered by various federal statutes, including 18 U.S.C. § 1503 (Obstruction of justice by threats or force) and 18 U.S.C. § 1505 (Obstruction of proceedings before departments, agencies, and committees).**

28. **14th Amendment [Violation of parental rights] Glucksberg, 521 U.S. 702 (1997), that the Constitution, and specifically the Due Process Clause of the Fourteenth Amendment, protects the fundamental right of parents to direct the care, upbringing, and education of their children. Id.**

#### **IV. FACTS COMMON TO ALL COUNTS**

1. In April of 2022, in Osceola county Nantita had Donald falsely arrested and falsely imprisoned for domestic violence which a jury impeached Nantita as a witness after she committed countless perjury and even admitted to such perjury and then deliberated a not guilty verdict on all charges within 10 minutes unanimously.
2. On 6/6/2022 Donald filed proceedings for dissolution of

marriage (hereafter referred to as the “Divorce case”) in the Circuit Court of Osceola County, Florida and the case was entitled: 2022 DR 002336 DC - SEOANE, DONALD CARLOS vs SEOANE, NANTITA. As part of the Divorce case, Donald and Nantita had and have two minor children whose allocation of parental responsibilities and allocation of parental time and physical custody has become and evolved into a hotly contested parental decision making dispute f/k/a custody dispute.

3. Noel has had a relationship with my wife Nantita and Was conspiring with her several month before my false Arres, false imprisonment and separation and has participated in not only being at each court appearance in my divorce and injunction cases and conspired and influenced countless government corrupt officials to cover my childrens abuse by the mother and him but also has damaged all my cases. It has also now contributed to me to

lose custody of my children fraudulently.

### **MORE FACTUAL ALLEGATIONS**

1. In April of 2022 Plaintiff was falsely arrested and falsely imprisoned because of his illegal immigrant Drug Addicted Thai porn star Prostitute perjury committing compulsive lying wife Nantita Seoane out for the 100k worth of their paid off Florida titled mobile home exclusively in her name with rented land in a plot drawn up with her and her porn fan boyfriends and Nantita's best friend drug addict and drug trafficker Michelle Gilliam neighbor across the street and the Osceola County Sheriff's office falsely arrested and falsely imprisoned Donald on 3 counts of domestic violence.

2. The Plaintiff hereby incorporates all exhibits attached to this claim and declaration and as to his sworn formal complaint(s), states such complaint is attached solely for the purposes of showing probable cause within this claim and declaration and states that "[A] copy of any written instrument which is an exhibit to a pleading is a part



thereof for all purposes." Bahalola v. HSBC BANK. USA. NA, 751 SE 2d 545-Ga. App. 750 (2013).

3. After this is when the Plaintiff started to uncover the abuse of the children and started to report it to countless agencies and authorities including but not limited to DCF, Osceola County Sherriff and others and these complaints alleged also state created danger under oath & penalty of perjury, generally alleging probable cause that Nantita was conspiring with countless government and state agencies to knowingly falsely imprison the Plaintiff and even attempts to gain more fraudulent criminal charges against the plaintiff and in the furtherance thereof Nantita and countless other state officials conspired to remove or modify the Plaintiff's child custody, case records, DCF records.

4. The sworn formal Complaints and DCF reports and calls to police was necessary to alert the state of Florida's law enforcement and prosecutorial authorities with jurisdiction

over such alleged crimes of criminal offenses that had been committed by Nantita and Florida state officials colluding and conspiring with her, officers or agents or were about to committed and that the alleged acts affected the safety and security of the Plaintiff and his young children, the public trust, public confidence and the integrity in the judicial system.

31. It can be argued to a jury that Noel would know that to Interfere in plaintiff's legal matters and cases and deny Donald of his constitutaional rights on his experience that was unlawful and unconstitutional and contrary to his duties owed to Plaintiff, would cause Plaintiff and his children severe emotional and mental distress and mental anxiety because he knew the many of the Plaintiff's claims were titled as emergencies and about claims of child abuse, child sexual abuse and child neglect which he knew to be an expeditious request for relief from what he also knew to

be were threats to Plaintiffs and his children's safety and security.

32. Moreover, based on the facts alleged there is reasonable evidence which could be argued to a jury that Defendants Holly N Derenthal and Christy C Collins engaged in a conspiracy and was bias and prejudice to Plaintiffs while presiding as judges within his recusal motions in denying his relief, redress, a proper remedy and psychological vindication and that they knew that in order to further the conspiracy, causing Plaintiff severe emotional and mental distress, anxiety, worry and mental anguish would be necessary to further the goal of the conspiracy and knowing such engaged in said acts regardless of the distress the Plaintiff would face.

33. Under the circumstances where it is alleged that Noel with an obligation and duty to provide protection of the laws, who disregarded those obligations and duties in order to deny

or delay and use corrupt connection tactics against a citizen seeking meritorious relief: a proper remedy, redress and the psychological vindication where it was alleged of child abuse, child sexual abuse and child neglect is violation of the Constitution that threatened his childrens safety and security would certainly cause severe emotional or mental distress and Noel would know that either anxiety, worry, distress, fear and emotional and mental distress would in fact occur and would be necessary to achieve the goals of conspiracy.

**EXPEDITED, EMERGENCY AND PRIMARY CONSIDERATION OF CASE**

1. Under the totality of the circumstances and taking the Plaintiff's declaration and claim as a whole, his multiples of redress of grievances that were met by a pattern and scheme of bias and prejudice, an acquiescence or sanctioning of state created danger, the continuation of the denial or delay of a proper remedy, the denial relief, redress and vindication in the

protection of the laws, the failure of multiple officials to perform according to their duties, obligations and sworn oath, the alleged vulnerability to danger and new danger affecting Plaintiff's safety and security and the esoteric scheme at large which based on its construction, a likelihood exist that workers currently known to the Plaintiff may be activated to obstruct justice through the passage of time when considering these claims herein, the Plaintiff calls on this Court's and Judge's Honor to apply its "[J]udicial experience and common sense." *Geinosky v. City of Chicago*, 675 F 3d 743- Court o[Appeals Seventh Circuit (2012)

2. Plaintiff requests that based on the totality of circumstances in this claim and declaration that he has cause for an emergency consideration and adjudication based on the existential need to provide Plaintiff and his children protection of the laws under the United States Constitution because of the inaction or refusals of what is shown to be, the entire State

of Florida - who having a duty & obligation to provide Plaintiff protection, without any justification - refusals to do so, although within their power to do so & calls on the court to use any of its power to provide such protection and bypass any procedural barriers due to a threat to safety being alleged.

3. Plaintiff does not call for a foregoing or subtraction of court procedures related to response times to motions, briefs etc., which may prejudice Defendant(s), rather, expedited consideration of his claims once the claims, motion, briefs, pleadings or any paper or document becomes ripe for review or judicial determination or adjudication.

4. Plaintiff certifies that he in good faith intends to serve process and summons on each and every Defendant in an expeditious fashion unless providentially hindered to assist the court.

**COUNT 1- DECLARATORY RELIEF**

34. Noel has either participated in or directly caused much of the actions, crimes, civil violations and constitutional violations listed below.

35. Plaintiff repeats & realleges as if fully alleged herein and by reference.

- i. Declaratory relief for countless state agencies refusal to investigate sworn formal acts alleged probable cause of State Created Danger and covering up of child abuse and neglect.

36. Plaintiff states that there is an actual, present, and justiciable controversy between All Defendants of whether they're knowing and persistent refusals to investigate, arrest, indict or criminally refer or procure the same, although within their power to do so, of sworn formal complaints, alleging probable cause of a conspiracy to commit false imprisonment, child abuse, child neglect, child sexual abuse and more and state created danger by Florida state officials violates Plaintiff's

substantive due rights in violation of the Fourteenth Amendment under a duty to protect analysis.

37. Plaintiff states that the Defendant's had actual or constructive knowledge of Plaintiffs sworn formal complaints alleging probable cause of a conspiracy to commit false imprisonment, child abuse, child neglect, child sexual abuse, perjury and much more and state created danger and although they had the power to arrest, indict, charge, investigate, criminally refer or procure the same, the defendants knowingly and persistently failed to act and instead covered up and otherwise prevent the state created danger or make Plaintiff and his children less vulnerable to danger for the acts of Florida state officials and defendants involved as alleged and by failing to provide such protection services or intervene when they had a duty to do so under the Florida constitution or as a result of their Compact with the Plaintiff violated Plaintiffs substantial due process rights.



38. Plaintiff states that the defendants knowing and persistent refusals report, investigate, arrest, indict, charge or even refer matters to in formal complaints alleging probable cause of a conspiracy to commit false imprisonment by state officials, child abuse, child neglect and sexual abuse in which a reasonable and prudent person acting in good faith would have found sufficient including all inferences of what Plaintiff alleged to be "threats his children's safety and security", clearly shocks the conscience and violates the Due Process clause in *DeShaney* because the government is to "[S]ecure the individual from the arbitrary exercise of the powers of government and to prevent governmental power from being used for purposes of oppression ... [because] ... [I]t's purpose was to protect the people from the State, not to ensure that the State protected them from each other."<sup>27</sup> *DeShaney v. Winnebago County Dept. of Social Services* 489 U.S. 189 (1989) and there is a justiciable issue and controversy of whether the

defendants failure to act, intervene or provide protection services to Plaintiff violated the Fourteenth Amendment.

- ii. Declaratory relief for Breach of Contract - Breach of Contractual Compact obligation for failure to perform according to their legal duties and obligations.

39. Every single defendant involved in this lawsuit even if not a direct state employee is a mandatory reporter to DCF and has failed to follow the law and report the childrens abuse being done by the mother that they were aware of from the children or the fathers reports and furthermore many have made several false reports to DCF against the father which were ALL unfounded. "Chapter 39 of the Florida Statutes (F.S.) mandates that any person who knows, or has reasonable cause to suspect, that a child is abused, neglected, or abandoned by a parent, legal custodian, caregiver, or other person responsible for the child's welfare shall immediately report such knowledge or suspicion to the Florida Abuse

Hotline of the Department of Children and Families.”

40. Plaintiff states that there is an actual, present and justiciable controversy between the Plaintiff and all Defendants of whether they're mowing or persistent, withholding, frustrations, delays, denials and refusals to perform according to their obligation and duties 27 "[I]naction can be every bit as abusive of power as action, ... oppression can result when a State undertakes a vital duty and then ignores it." *DeShaney v. Winnebago County v. Dept. of Social Services* 489 U.S. 189 (1989) and provide protection of the laws to Plaintiff by rendering him a proper remedy, relief, redress and vindication for his meritorious relief in which he was entitled to, breached a contractual obligation of a compact in which the Plaintiff is the beneficiary.

41. Plaintiff states that the actions herein entail a fundamental breakdown of the social compact and the

administration of justice in the State of Florida as applied to Plaintiff by Defendant's who denied him protection of laws in their refusing to investigate sworn formal complaints

Defendant Justices who frustrated, delayed, denied, prevented or withheld Plaintiff's meritorious redress, relief, vindication and remedy in his complaints and motions and more.

42. Plaintiff alleges that being a beneficiary of a social compact and all Defendants being bound by contract with the beneficiaries of the State of Florida's and United States Constitution's- the social compact or contract- breached said compacts and their contractual obligations and that the acts of the officials named herein evince a continuing pattern and scheme that were neither separate or isolated incidents but a continuing nature of multiple denials, delays or frustrations of almost identical grievances which were manifestly incompatible with the law and occurred within multiple agencies within Florida's executive branch, multiple courts

within Florida's judicial branch and carried over into the Federal district court of Florida.

43. Plaintiff states that all Defendants took an oath and swore to support and defend the constitution of the United States, had a legal duty and obligation to provide Plaintiff protection of the laws and failed to perform according to their duties and obligations, with malice or reckless indifference to the rights of the Plaintiff and said actions breached the compacts in which Plaintiff was a beneficiary and their contractual obligations and or have violated defamed plaintiff in a conspiracy to discredit the father and assist the mother and her court cases.

Ill. Declare that the defendants knowing and persistent failures to provide Plaintiff protection of the laws relieves Plaintiff from the obligation of obedience to Florida's law.

44. Plaintiff states that there is an actual, present and justiciable controversy between the Plaintiff and the respondents of whether they're knowing or persistent,

withholding, frustrations, delays, denials and refusals to perform according to their obligation and duties and provide protection of the laws to Plaintiff and his children by rendering him a proper remedy, relief, redress and vindication for his meritorious relief alleging probable cause of acts of state created danger in breached a compact in which the Plaintiff is the beneficiary of thereby relieving Plaintiff from the obligation of obedience to Florida's laws - until such breach is cured.

45. Plaintiff declares based on his claims alleged herein that he no longer has an obligation to remain obedient to Florida's laws as a result of the breach of a compact by the defendant's of a fundamental nature in which Plaintiff is a beneficiary.

46. Plaintiff alleges that that the acts and conducts of each defendant herein evince a continuing pattern that were neither separate or isolated incidents but of a continuing nature of identical grievances and were of a fundamental nature because the Plaintiff alleged threats to safety and security arising from plots to imprison him by state officials which supported the likelihood or certainty based on probable cause allegations that

Plaintiff was in danger or more vulnerable to danger "[A]re not free to let the state of nature take its course." Farmer v. Brennan. 511 US 825 - Supreme court (1994)

47. Such refusals to investigate, arrest, indict, charge refer or procure the same or merely contact the Plaintiff based on the facts of probable cause alleged is transient, light or de minimis cause but as applied to the Plaintiff one of the most fundamental liberties promised to him in society, life and liberty, especially from acts involving state created danger by state officials under probable cause allegations of a "knowing" conspiracy to commit false imprisonment and to engage in conduct withholding, denying, refusing, or avoiding Pany investigation, arrest, charge, indictment or referral of the state actors cause of a fundamental breach of a compact in which Plaintiff is and such breach, in its fundamental character relieves Plaintiff of obligation of obedience to Florida's laws until such breach is cured.

**COUNT 2 - BREACH OF CONTRACT - CONTRACTUAL**  
**OBLIGATION -**  
**LEGAL OBLIGATION AND LEGAL DUTY**

1. Plaintiff repeats & realleges as if fully alleged herein and by reference.
  
2. "[T]o ensure the preservation of this social contract between our government and its citizens ... we developed a group of rights defined by a constitution, and a judicial system charged with being the vigorous and independent guardian of those rights." Christensen v. State, 468 SE 2d 188 266 Ga. 474 -Ga Supreme Court (1996)
  
3. Each Defendant who took an office to support and defend the U.S. constitution and/or the Florida Constitution is bound by contract with the beneficiaries of Florida's and United States Constitution as a result of each Defendants said oath.
  
- 28 28 "[H]ow immoral to impose it on them, if they were to be



used as the instruments, and the knowing instruments, for violating what they swear to support." Marbury v Madison. 5 US 137 - Supreme Court (1803)

48. The Plaintiff is a beneficiary of the "United States Constitution and Florida constitution" - the social compact(s) or contract(s).

49. All times herein, Defendants owed Plaintiff a legal duty and an obligation when considering any grievance, petition, complaint, document or paper for request for any relief, redress or grievance for protection of the laws, to honestly, in good faith, with care, in accordance with the law, their offices and their oaths, to provide Plaintiff a proper remedy, redress, relief and vindication and knew that there were not to erroneously, arbitrarily, with malice or reckless indifference to the rights of the Plaintiff deny to him any meritorious request for relief, redress, a proper remedy or psychological vindication when such relief, redress, remedy or vindication was required, appropriate, mandated or Plaintiff was entitled to it.<sup>29</sup>

50. At all times herein, this duty and obligation owed to

Plaintiff as a beneficiary of the social compacts was an enforceable contract or enforceable contractual obligation.

51. The Plaintiff has a right to enforce this contractual obligation as beneficiary to the social compact or contract.

("Florida constitution and United States Constitution")

52. At all times herein, each Defendant, did with malice or reckless disregard and indifference to the rights, with bias or prejudice, knowing or having reason to know Plaintiff was owed a duty in his grievances, and owing Plaintiff a duty and obligation did delay, withhold, deny, prevent or frustrate Plaintiff's due and proper redress, relief, remedy and vindication in protection of the laws.

53. Defendant's, having the power to investigate, criminally refer, indict, charge, place warrants, arrest or procure the same and having actual or constructive knowledge of complaints Each Defendant in this case took an oath of office and signed such oath and did swear on the bible that They

would support and defend the United States Constitution. Formal Complaint(s) showing probable cause of which a reasonable and prudent person would have known of state created danger in a conspiracy to commit false imprisonment and place plaintiff's young children in serious danger all inferences that the Plaintiffs children "life was in danger" state actors who were alleged to be the cause of state created, did with malice and reckless indifference to the rights of the Plaintiff did fail to perform according to their duties and obligations owed to Plaintiff, promptly and in good faith, knowingly and persistently by investigating, indicting, arresting, charging, criminally refering or procuring the same, of the state actors who were alleged to the cause of the state created danger in Plaintiffs formal complaint(s), repeatedly and persistently, each day after their receipt of such complaint(s) and said acts fundamentally breached the contractual obligation and duties they owed to Plaintiff in the social compact or contract.

54. Defendant Justices owing the Plaintiff a duty and obligation, having experience as Justices, with bias and prejudice, malice or reckless disregard for the rights of the Plaintiff and his children did refuse to perform and abide by their obligation and duties owed to Plaintiff by frustrating, delaying or denying Plaintiff a due, proper or adequate remedy, redress, physiological vindication, adequate, and required Relief and protection of the laws when acting as Justices in Plaintiffs Direct cases and hearings contrary to their sworn oaths and their acts as a whole breached the obligations & duties owed to Plaintiff in the social compact or contract.

55. Defendant's owing the Plaintiff a duty and obligation and having years of experience to know the law, what their duties were and how to apply them did, with malice or reckless disregard for the rights of the Plaintiff refused to perform and abide by her obligations and ministerial duties in their refusing to grant Plaintiffs Motions in Plaintiffs court cases

contrary to her sworn oath and her acts as a whole breached their obligations & duties owed to Plaintiff in the social compact or contract.

56. Defendants owing the Plaintiff a duty and obligation to Investigate complaints did, refuse to perform and abide by their obligations and duties in refusing to investigate Plaintiffs multiple Agency corruption complaint(s) in Florida's executive branch contrary to their sworn oaths and their acts as a whole breached the obligations and duties owed to the Plaintiff in the social compact or contract.

**COUNT 3 - 42 U.S.C. § 1983 VIOLATION OF SUBSTANTIAL DUE PROCESS STATE CREATED DANGER UNDER DESHANEY**

1. Donald realleges as if fully alleged herein and by reference.

2. The Defendants has and continues to have a legal duty and obligation to provide protection to its citizens from any state created danger arising from the acts of their state

officials. See *Deshaney v Winnebago County Dept. of Social Services* 489 U.S. 189 (1989)

3. "[T]he Due Process Clause ... was intended to prevent government "from abusing [its] power, or employing it as an instrument of oppression ... Its purpose was to protect the people from the State, not to ensure the State protected them from each other. *Id*

4. Plaintiff brings two claims under *Deshaney*; (1) the failure to protect Plaintiff from state probable cause of created danger (2) and creating a new danger in the failure to protect in violation of the substantive due process clause of the Fourteenth Amendment.

5. Defendants collectively received actual or constructive complaints addressed to them of notice of sworn Formal Complaints or verbal complaints alleging probable cause of a conspiracy to commit false imprisonment, interfere in plaintiff's custody rights, perjury, conspiracy and much more

that the Plaintiff's children's life were in danger and that plaintiff feared more abuse or worse from the children's mother and or her porn fan prostitution clients or druggie friends arising from the affirmative acts of Florida state actors.

6. The probable cause allegations stated claims that were acts of state created danger because the Plaintiff alleged probable cause of an act of false imprisonment by state officials to "knowingly" propel him into "[P]risons ... necessarily dangerous places." Farmer v. Brennan. 511 US 825 - Supreme Court (1994)

7. The Plaintiff concerns himself with the claims alleging and only the allegations showing probable cause into the allegations alleging a conspiracy to commit false imprisonment, cover child abuse, child neglect and child sexual abuse and state created danger and does not attempt to litigate any of the specific or general acts in Plaintiffs sworn formal complaints that Plaintiff alleges were unlawful.

8. The probable cause alleged in Plaintiff's sworn formal complaints was not of any matter de minimis but matters that shock the conscience as a threat to life was stated or alleged and ignored by the plaintiff's who a duty and obligation to act but refused to do so.

9. The allegations in Plaintiff's sworn formal complaints and motions and more supported probable cause of a "knowing" conspiracy to commit false imprisonment and cover child abuse of which a reasonable or prudent person would have known based on the facts alleged therein his sworn formal complaints that there was sufficient cause to believe that probable cause to commit the illicit acts were in fact committed, had been committed or about to committed.

121. Plaintiff sent & received messages by the Governor's office & the State Attorney's office, DCF, Sherrif office, Child Protection Team and more and the Plaintiff alleged further claims in his sworn formal complaints and motions to support



probable cause in that the Departments ignored his open request to stop the child abuse of his children and they only in return covered the mothers abuse and turned everything on him defaming him.

10. False swearing is a crime in the State of Florida and many reports were just ignored by many agencies and there was no reason not to at minimum promptly and in good faith "investigate" or criminally refer the sworn formal complaints or contact the Plaintiff via mail or telephonically about his claims or to clarify any confusion or gain clarification of any of his claims.

57. In addition, "Probable cause does not preclude inquiry into the knowing or reckless falsity of the affidavit." United States v. Leon. 468 US 897-Supreme Court (1984)

58. Each sworn formal complaint or motion had the mailing address and telephonic number of the Plaintiff and after Defendant's receipt of Plaintiff's sworn formal complaints and

each of the Defendants receipt of Plaintiffs sworn formal complaints many of the defendants didn't even contacted Plaintiff via mail, telephonically or email.

59. The Plaintiff provided overwhelming evidence of probable cause of a conspiracy to commit false imprisonment and cover child abuse by state officials and others.

60. Based on the allegations in Plaintiffs sworn formal complaints any reasonably prudent person acting in good faith would know that a crime was afoot or about to occur and such threat or looming of a crime continues as of the date of this filing.

61. Moreover, the allegations of a conspiracy to commit false imprisonment and cover child abuse supported a reasonable belief that it was probable cause to believe that Plaintiffs childrens life was in danger or that they would be more vulnerable to danger as a result of their inaction because as the sworn facts alleged - "[The conspirators] knew that the

mother was and still is a serious danger to the children but [conspired to cover the mothers child abuse] because [they] feared liability in official proceedings if they didn't side with a fake domestic violence victim and her well connected corrupt Help Now Shelter lawyers Jennifer Jane Watson and Sara Vance and countless other corrupt officials- which facts support a further inference that Plaintiffs children's safety and security was at risk if he was imprisoned because the liability for the unlawful acts to falsely imprison the Plaintiff would not end with Plaintiffs arrest. They have all tried to have the Plaintiff falsely arrested for several more crimes he didn't commit since the first false arrest but so far all have failed.

62. Because of the plaintiff's failure to do any act, intervene or attempt to lessen the dangers the Plaintiff's children faced the Plaintiff children was in danger or more vulnerable to danger.

63. Because of the plaintiff's failure to do any act, intervene

or attempt to lessen the dangers the Plaintiff faced when they knew or should have known that Plaintiff faced such dangers and owed him a duty and obligation to provide such protection, those knowing and persistent denials each day created a new state created danger in the form of, "[O]ppression ... when [the] State undertakes a vital duty and then ignores it." [DeShaney v. Winnebago County Dept. of Social Services 489 US. 189 {1989}] and such new danger is which Plaintiff brings his claim.

64. The state attorney's office, the Governor's office, the Osceola County Sherriff's office, the JQC, DCF, CPT, and many more, with malice or reckless disregard for the rights of the Plaintiff did deny to Plaintiff protection of the laws in their refusing to investigate, arrest, charge, refer or indict state officials based on probable cause of a conspiracy to commit false imprisonment. Child abuse, false reports to DCF, refusing to report to DCF child abuse and much more and

state created danger in breach of their legal duties and obligations owed to Plaintiff and in breach of the social compact or contract.

65. Lastly, Defendant's capable of investigating and owing the Plaintiff a duty and obligation to investigate complaints didnt, with malice and reckless disregard for the rights of the Plaintiff did refuse to perform and abide by their obligations and duties in refusing to investigate Plaintiffs multiple Agency complaint(s) alleging acts that they knew to be or had reason to know was state created danger and in doing so violated Plaintiffs Fourteenth Amendment rights to substantive due process of law under a duty to protect analysis.

**COUNT 4 - VIOLATION OF FIRST AND FOURTEENTH AMENDMENT RIGHT TO A PROPER REMEDY, REDRESS AND RELIEF-VIOLATION OF FOURTEENTH AMENDMENT PROTECTION OF THE LAWS**

1. Plaintiff repeats & realleges as if fully alleged herein and

by reference.

2. Plaintiff had a right to claim protection of the laws and it is, "[T]he very essence of civil liberty ... in the right of every individual to claim the protection of the laws, whenever he receives an injury." *Marbury v. Madison*. J Cranch 137. 163 (1803)30

3. Moreover, while seeking protection of the laws, "[T]he State's obligations under the Fourteenth Amendment are not simply generalized ones; rather, the State owes to each individual that process which, in light of the values of a free society, can be characterized as due." *Boddie v. Connecticut*. 401 US. 371 (1971)

4. For what purpose is the right to a redress ~grievances when that right is met by public servants in either the offices of the judicial or executive branch where the grievance is submitted, who owe a duty and obligation to provide a remedy if one shall be rendered according to law but with malice or

reckless disregard for the rights of the aggrieved, refuses, fails, withholds or denies meritorious redress when such redress should have been rendered?

5. Plaintiff believes the answer lies in the 1803 case of *Marbwy v Madison* in which the court stated, "[I]t cannot be presumed that any clause in the constitution is intended to be without effect." *Marbury v. Madison*. 5 US 137-Supreme Court (1803)

135 'Toe First Amendment interests involved in private litigation - compensation for violated rights and interests, the psychological benefits of vindication [and] public airing of disputed facts." *Bill Johnson's Restaurants. Inc. v. NLRB*. 461 US 731 (1983)

6. To that end, Plaintiff says what was due was "[T]he maxim *ubi jus, ibi remedium* [which] lies at the very foundation of all systems of law," [*United States v. Loughrey* 172 US. 206 (1898)]/ but was violated by all Defendants herein who, with

malice or reckless indifference to the rights of the Plaintiff, and/or with bias and prejudice, engaged in prejudicial bias in lieu of impartialness, denial of protection in lieu of protection, deliberate or recklessness foreclosure or unlawful delay of meritorious remedy in lieu of due or adequate remedy by delaying, denying, preventing or frustrating Plaintiffs due and proper redress, remedy, relief, grievances and vindication in the protection of the laws knowing or having reason to know that to do so was contrary to their duties and obligations owed to Plaintiff and manifestly incompatible with the law.

7. At all times herein, each Defendant had a contractual obligation they owed to Plaintiff to adhere to their duties and obligations they owed Plaintiff and failed to perform in those obligations with malice or reckless disregard for the rights of the Plaintiff.

8. Defendant's owed Plaintiff a duty to act in good faith and in accordance with the law while acting as Governor, Attorney



General, District Attorney and Sheriff, and having actual or constructive knowledge of Plaintiffs sworn formal complaints, with malice or reckless disregard for the rights of the Plaintiff did deny to Plaintiff protection of the laws in a grievance he had via his sworn formal complaints requesting an investigation into state acts to unlawfully imprison him by knowingly and persistently, refusing to investigate, arrest, charge, refer or indict the state officials based on probable cause of a conspiracy to commit false imprisonment and state created danger in violation of Plaintiff's First & 14<sup>th</sup> Amendment constitutional protections to a proper remedy, redress, relief and vindication and his Fourteenth Amendment right to procedural and substantive due process of law in the protection of the laws.

9. Defendant Justices, owing Plaintiff a duty to act in good faith, in accordance with the law while acting as presiding judges in their motions and hearings, with malice or reckless

disregard for the rights of the Plaintiff, in a pattern of bias and prejudice, ( 1) deny Plaintiffs Motions to reconsider, while acting as presiding judges in Plaintiffs Direct appeal knowing or having reason to know based on their experience that to do so was manifestly incompatible with the law and required a different decision from the one(s) rendered; and thereafter (3) refused to recuse in Plaintiffs direct Motions to recuse and motions to disqualify when they knew or had reason to know they had a bias or prejudice or that their impartiality could reasonably be questioned in violation of his First & Fourteenth Amendment constitutional protections to a proper remedy, redress, relief and vindication and his Fourteenth Amendment right to procedural and substantive due process of law in the protection of the laws.

**COUNT 5 - 42 U.S.C. § 1983 CONSPIRACY**

1. Donald repeats & realleges if fully alleged herein and by

reference.

2. The Plaintiff was entitled to be free from a conspiracy to commit a violation of his constitutional rights under the constitution & 42 U.S.C. § 1983 under the Klu Klux Klan Act.

3. Each of the Defendants herein this count engaged in a conspiracy to delay, deny, prevent or frustrate Plaintiffs due and proper redress, vindication and protection of the laws if there was a possibility, likelihood or certainty that criminal prosecution could be brought against Florida judges Christy C Collins and Holly N Derenthal and many others in such relief thereof his grievances and in furtherance thereof engaged in a pattern and scheme of prejudicial bias in lieu of impartialness, denial of protection in lieu of protection, deliberate or reckless foreclosure or unlawful delay or frustration of meritorious relief or a proper remedy in lieu of due or adequate relief and redress in violation of (1) Plaintiff's First and Fourteenth Amendment rights to a proper remedy, redress, psychological

vindication and relief, (2) and his right to protection of the laws under the duty to protect analysis under the Fourteenth Amendment.

4. More bluntly, the conspirators anticipated in a common venture to railroad the Plaintiff to prevent him obtaining redress, relief, psychological vindication and a proper remedy in his grievances against Florida judges and state employers and more if there was a possibility, likelihood or certainty that criminal prosecution could be brought against anyone in such relief thereof his grievances.

5. Each conspirator herein had knowledge of Plaintiffs grievances and according to the facts alleged in Plaintiff's grievances, appeals or complaints brought to their attention, knew that they were grievances against of his children being abused and the crimes the conspirators were committing to cover it up.

6. On information and belief, there was a major understanding in the State of Florida known by each

Defendant of an esoteric understanding and motive shared between other courts, state and many other actors also involved in the railroading campaign against the Plaintiff of the need to make certain that under no circumstances could any relief in Plaintiffs grievances go in his favor if there was a possibility, likelihood or certainty that criminal prosecution could or would be brought against anyone or had an agreement between other courts, state and other actors also involved in the railroading campaign against the Plaintiff to make certain of the same.

106. Some of the text in this lawsuit is taken from my other lawsuit and son of the people referred to as Defendants here including the judges below are defendants in other cases but not in this case but are relevant because Noel has influenced them and conspired with them and countless others against Donald Seoane.

107. At every turn and at every step of the way during the

Plaintiffs attempts to redress even the most basis grievances brought to the attention of the Defendants herein, they all played their parts & played their roles in this common venture to make their conspiracy work.

108. In reference of this Conspiracy, Defendants Christy C Collins and Holly N Derenthal, while acting as presiding judges, with malice or reckless disregard for the rights of the Plaintiff, in a pattern of bias and prejudice, ( 1) Denied Plaintiffs Motions and motions to reconsider, post motions to supplement and disqualification motions knowing or having reason to know based on their years of collective experience that to do so was manifestly incompatible with the law and required a different decision from the one(s) rendered; and thereafter (3) refused to recuse in Plaintiff's attempts to get a nonbias fair judge when they knew or had reason to know they had a bias or prejudice or that their impartiality could

reasonably be questioned in violation of his First & Fourteenth Amendment constitutional protections to a proper remedy, redress, relief and vindication and his Fourteenth Amendment right to procedural and substantive due process of law.

109. Defendants Holly N Derenthal and Christy C Collins when faced with a motion to disqualify and plaintiff asked for a new judge to hear his motions for rehearing and to reconsider all prior rulings related to Plaintiffs motion to supplement the record, did because of bias and prejudice defend themselves against Plaintiffs motion to disqualify and denied his motions when they knew or should have known that such a defense against Plaintiff's allegations created an appearance of partiality mandating their recusals and in furtherance of the conspiracy refused to disqualify to ensure that their court orders were not reversed or the conspiracy was not disturbed.

110. In furtherance of the conspiracy, Defendants with malice

or reckless disregard for the rights of the Plaintiff, did refuse to file Plaintiffs Motion to Reconsider knowing or having reason to know that to do so was manifestly incompatible with the law to further conspiracy in violation of Plaintiffs First & Fourteenth Amendment constitutional protections to a proper remedy, redress, relief and vindication and his Fourteenth Amendment right to procedural and substantive due process of law. 31 "[E]fforts at defending themselves against motions to recuse will inevitably create an appearance of partiality. One reason is that if he defends himself he becomes an adversary of the movant for recusal." Post v State, 779 SE 2d 624- Ga: Supreme Court (2015)

111. In furtherance of the conspiracy, Defendants, with malice or Reckless disregard for the rights of the Plaintiff refused to investigate Plaintiffs multiple Agency corruption complaint(s) alleging probable cause of acts to commit false imprisonment and cover child abuse by employees employed by the state and within the executive branch of Florida in conspiracy with Florida judges



Christy C Collins and Holly N Derenthal in violation of Plaintiffs Fourteenth Amendment rights to substantive due process of law under a duty to protect analysis.

112. In furtherance of the conspiracy, Defendant Holly N Derenthal and Christy C Collins, with bias and prejudice, malice or reckless disregard for the rights of the Plaintiff, did frustrate, delay or deny Donald of a due, proper & adequate remedy, redress, physiological vindication, adequate, minimum and required relief and protection of the laws when acting as presiding Judge in Plaintiffs motions by a delaying a ruling on Plaintiff's motions and denying countless motions and petitions to stop the child abuse from the mother towards his children and subsequently, recklessly, arbitrarily and erroneously denying his Motions to recuse and disqualify and knowing or having reason to know to do so was manifestly Incompatible with the law in violation of Plaintiff's First & Fourteenth Amendment constitutional protections to a proper remedy, redress, relief and vindication and his Fourteenth Amendment right to procedural and substantive due process of law.

**COUNT 6 - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

**Again this text was taken from my other lawsuit and people called defendants are only defendants in other case but the text is listed here because Noel has influenced them and conspired with them and countless others against Donald Seoane.**

112. Donald repeats & realleges as if fully alleged herein and by reference.

113. Plaintiff brings a claim of intentional infliction of emotional distress based on the violations of the Plaintiff's constitutional protections in the defendants failure to investigate probable cause of state created danger for him and his children, the Defendants, erroneous, reckless delaying, discrimination and denying and frustrating Plaintiff of his meritorious relief while acting as a presiding judges and others in his Direct complaints which they knew or should have known was manifestly incompatible with the law and a manifest injustice, Defendants Lange and Spencer's failure to investigate probable cause of state created danger to his

children and Defendant justices arbitrary, erroneous, reckless delaying, denying, frustrating Plaintiff of meritorious relief while acting as a presiding judges actions which they knew or had reason to know was manifestly incompatible with the law.

114. At all times herein each act of the Defendants named herein shock the conscience because the acts of the Defendants herein were no mere citizens who not only had a Legal duty and obligation to follow the law, act in good faith, with honesty in accordance with their oath but had the experience and status of a State or Federal official who would know or had reason to know that their acts was manifestly incompatible with the law or in violation of the Plaintiffs rights.

115. At all times herein, it is a fact that his attempts at redress, protection, relief or remedy were also not any basic intangible rights the Plaintiff sought to vindicate, rather, sacred liberties or circumstances in which the decisions would exact severe emotional and mental distress involving (1) probable cause alleging threats to his safety and security and an inference of threat to his safety and security involving

threats to his life by state officials; (2) grievances seeking the reversal of alterations and modifications of his initial custody agreement arising from child custody proceedings which substantially lowered the time spent and overnights with his children; (3) allegations of probable cause of threats to safety and security involving the executive branch (4) and attempts to remove and cover the allegations of child abuse in violation of the constitution of the United States.

116. To avoid repetition, as to Defendants causing the Plaintiff severe mental and emotional distress, mental anguish, anxiety the Plaintiff repeats, realleges and incorporates each and every paragraph above as if fully alleged herein.

117. It could be argued to a jury that to ignore, refuse, deny or withhold from doing any act that at minimum, offered some sense of a belief or relief that protection or consideration of claims alleging probable cause of a plot to knowingly imprison Plaintiff and cover the children abuse and countless wrong doings and illegal criminal offences of his wife towards him and his children including all of the inferences thereof would in fact cause Plaintiff severe emotional and mental distress,

anxiety and mental anguish especially when the defendants had a duty to do so and engaged in conduct and behavior that can be reasonable considered to be acquiescence to the allegations of probable cause alleging state created danger.

118. To avoid repetition, as to Defendant Justices and other Defendants causing the Plaintiff severe mental and emotional distress, mental anguish, anxiety the Plaintiff repeats, realleges and incorporates paragraphs above as if fully alleged herein.

119. As to Defendant Holly N Derenthal and Christy C Collins, it can be argued to a jury that to deny countless motions to recuse, reconsider, disqualify and many more while bias and against Florida statutes and of allegations of nefarious intentions of the Defendants, and disregard such statute and notice would cause severe anxiety, mental and emotional distress and deprive him of psychological vindication in the Plaintiff having to know based on her conduct that in his seeking such comi in good faith to redress grievances in which he was entitled to do would be deliberately delayed and frustrated contrary to law regardless of any claims of nefarious

intentions on behalf of the Defendants.

120. Plaintiff and his children suffered severe mental and emotional distress and an extreme loss in Confidence in the system of governance in the State of Florida in knowing that court judges would blatantly violate the law and refuse to recuse when bias and place him and his children in serious danger.

121. It can be argued to a jury that Defendant Holly N Derenthal and Christy C Collins would know that their acts would cause the exact distress the Plaintiff faced and would know that to delay Plaintiff would cause such distress and did engaged in such acts regardless of Plaintiffs distress.

122. At all times herein this count, Defendants engaged in conduct that was intentional or reckless and outrageous and the distress each Defendant caused the Plaintiff was casually connected to his attempts to seek redress of grievances or protection from which each Defendant owed Plaintiff according to their duties and obligations and their failures to provide Plaintiff such protection of the laws, relief, redress and a

proper remedy was without justification and each Defendant knew that to engage in said course of conduct was to cause and result in severe mental and emotional distress, anxiety and anguish to the Plaintiff.

123. As to Defendant Ron Desantis and others, it could be argued to a jury that to ignore, refuse, deny or withhold from doing any act that at minimum, offered some sense of a belief or relief that protection or consideration of claims alleging probable cause of a plot to knowingly imprison Plaintiff and cover the abuse of his children including all of the inferences thereof would in fact cause Plaintiff severe emotional and mental distress, anxiety and mental anguish especially when the Defendants had a duty to do so and engaged in conduct and behavior that can be reasonable considered To be acquiescence to the allegations of probable cause alleging state created danger.

**COUNT 7 - 42 U.S.C. § 1988 ATTORNEY FEES**

124. Plaintiff says that if he is successful on any claim he is deserving of any fee for his work, time, study and labor just like any other Attorney or lawyer as the "successful party."

125. Plaintiff alleges that any interest into which Plaintiff may not be entitled to attorney fees on the notion of "encouragement of attorney participation" prejudices him because he like dozens of other citizens, who will testify as witnesses, that most attorneys are not attracted and rarely accept lawsuits against Customs and border patrol agents.

**Fact why state employees, lawyers and others above are not able to hide behind color of law immunity or any other immunity including some of the text above**

137. **Color of Law Violation:** The state employee's actions were done recklessly outside of "color of law," meaning they were acting outside their official capacity or using their authority as a state employee to violate Plaintiff's rights.

138. **Exceeding Job Description:** The state employee's actions exceeded the scope of their official duties or job description. The evidence in this cases shows their actions went beyond what was required or authorized in their role.

139. **Violation of Constitutional Rights:** The countless constitutional rights that were violated by the state employee's actions went beyond what was required or authorized in their



role.

140. **Lack of Qualified Immunity:** The state employees should not be entitled to qualified immunity because their actions violated clearly established law. Their actions were clearly unconstitutional and illegal.

140. **Intent and Malice:** The state employees acted with intent, malice, or willful misconduct, which can be a basis for overcoming qualified immunity. The evidence demonstrates their wrongful intent.

#### Witnesses

I have a long list of witnesses that can testify but I think the only 1 Witness I need is Noel's wife GRECITA GAYLON MARQUIS that will be the straw that broke the camel's back and gets me and my kids justice once and for all and will prove all these people including Noel and everyone in my other federal lawsuit have committed a ton of felonies, constitutional rights violations and much more and should ALL be fired and held legally accountable and thrown in prison. I do believe that her life is in grave danger not only from Noel but from many other corrupt charters in government once I file this and she should be protected!

## EXHIBITS:

Please see exhibits of evidence below but note I have much much more but trying not to make this 800 pages like my other federal lawsuit but please read that and take into consideration that one also Seoane vs Derenthal :

### **DEMAND FOR JURY TRIAL**

I DEMAND A JURY TRIAL ON THIS LAWSUIT!

Therefore Donald and his children have suffered irreparable damage and by ALL defendant participating in committing felony conspiracy and others committing and assisting in felony perjury amongst all the other countless charges from constitutional rights violations to Florida Statutes violations succeeded in corrupting the state judicial process by participating in fraud and corruption and denying the Plaintiffs' Constitutional rights throughout the last 2 years Thus, defendant cannot benefit from any form of immunity.

### **PRAYER FOR RELIEF**

WHEREFORE, based on the foregoing, the Plaintiff requests that this Court:

A) Exercise jurisdiction and supplemental jurisdiction over this action and Plaintiff claims in the interest of justice;

B) Understand me not being a lawyer and only having a 8<sup>th</sup> grade education while learning the law and doing this by myself with no help from anyone all for the safety of my young children I might not understand or be able to ask for proper or legally allowed relief properly so please instead of just denying my lawsuit or request for relief or other issues that may arise that might be improperly done please set an order granting partially or an order to correct something and give me an opportunity to fix my mistakes.

C) Order immediate injunctive relief from NOEL MARQUIS to all Plaintiffs.

I believe that ongoing contact with my children by the Noel pose a threat to my rights, and I request injunctive relief immediately to prevent further harm to my children.

D) Order the state of Florida and CPT Child Protection Team to release the full unedited version of my 3 children's forensic interview video tapes so we can prove all the people listed in my other federal lawsuit and this one have conspired to cover child abuse, child neglect and child sexual abuse for Nantita Seoane the children's drug addicted prostitute porn star illegal Thai immigrant mother.

E) Award Plaintiff compensatory, actual and punitive damages in the amount of \$1 Million Dollars (\$1,000,000.00) from Defendant

and intentional emotional distress damages in the amount of \$1 Million Dollars (\$1,000,000.00) or an amount determined by a jury;

F) Impose all civil penalties by law;

G) Award Plaintiff reasonable attorney's fees, expenses, and costs of litigation pursuant to 42 U.S.C. § 1988 to the prose Plaintiff if he is the prevailing party;

H) Declare that Noel failures to provide Plaintiffs protection violated Plaintiffs Fourteenth Amendment rights;

I) Declare that Noel, knowing and persistent, withholding, denial and refusals to provide protection to person, property and liberty to the Plaintiff, although within their power to do so, breached a contractual obligation in which Plaintiff was a beneficiary;

J) Declare that the Noel knowing and persistent failures to provide Plaintiff protection of the laws breached a compact in which Plaintiff was a beneficiary relieving Plaintiff from the obligation of obedience to Florida's laws;

K) Any and all other relief the court deems just and proper.

The Plaintiff declares under penalty of perjury under the laws of the United States that each and every factual allegation is true and correct and to those alleged to be based on information and

belief, I deem those to also be true and correct according to the facts. 28 U.S.C. § 1746.

Please note I will serve defendant listed above.

By: Mr. *Donald Secane*

Mailing: 1970 E Osceola pkwy #113

Kissimmee Florida 34743

Email: victimofthesystemofwomen@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing will be furnished via Florida Courts E-filing Portal and US mail to: NOEL AARON MARQUIS on this \_25th\_ day of October, 2023.

*Donald Secane*\_\_\_\_\_

I certify that a copy of this document was ( ) mailed ( ) faxed and mailed (\*) e-mailed ( ) hand-delivered to the person(s) listed below on {date} \_\_\_\_\_.

Other party or his/her attorney:

Printed Name: NOEL AARON MARQUIS \_\_\_\_\_

Address: 425 Kestrel Dr \_\_\_\_\_

City, State, Zip: Groveland, FL 34736 \_\_\_\_\_

Telephone Number: 818-391-7814 \_\_\_\_\_

Fax Number: \_\_\_\_\_

Designated E-mail Address(es):

Designated E-mail Address(es):

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this motion and that the punishment for knowingly making a false statement

includes fines and/or imprisonment.

Dated: 10-25-23

*Donald Seoane*

Signature of Party or his/her attorney

Printed Name: Donald Seoane\_\_\_\_\_

Address: Please use email for service Travelingrvstyle@gmail.com

City, State, Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Fax Number: \_\_\_\_\_

Designated E-mail Address(es): Travelingrvstyle@gmail.com

**Exhibits**



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2008 CF 000429 CR - STATE OF FLORIDA vs. GILLIAM, MICHELLE

Print Summary

Summary History Charges Previous

**SUMMARY**

Judge: MORGAN, JON B      Court Type: FELONY      Case Type: CLOSED  
 Case Number: 2008 CF 000429 CR      Uniform Case Number: 492008CF000429XXCRXX      Status:  Waive Speedy Trial  
 Clerk File Date: 1/22/2008      Status Date: 5/27/2008      Agency: OSCEOLA COUNTY SHERIFFS OFFICE  
 Total Fees Due: 0.00      Custody Location:  
 Agency Report Number: 081006503

**PARTIES**

TYPE	PARTY NAME	ATTORNEY
DEFENDANT	GILLIAM, MICHELLE	WESTERVELT, JAMES (Main Attorney)
PLAINTIFF	STATE OF FLORIDA	

**CHARGES**

COUNT	DESCRIPTION	LEVEL	DEGREE	PLEA	DISPOSITION	DISPOSITION DATE
1	CHILD NEGLECT (827.03 3b)	F	S		NO INFORMATION	05/27/2008
2	POSSESSION OF COCAINE (893.13 6a)	F	T		NO INFORMATION	05/27/2008
3	POSSESSION OF 20 GRAMS OR LESS OF CANNABIS (893.13 6b)	M	F		NO INFORMATION	05/27/2008
4	POSSESSION OF DRUG PARAPHERNALIA (893.147 1)	M	F		NO INFORMATION	05/27/2008

**EVENTS**



OSCEOLA COUNTY  
SHERIFF'S OFFICE

Continuation of:  Charging Affidavit  
 FSAO

Defendant Name: SEE PAGE 1	Case Number: 081006503	Page: 2 of 2
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ON 01-19-08, I RESPONDED 5565 WEST IRL0 BRONSON HIGHWAY #508, IN REFERENCE TO A COMPLAINT OF ON GOING DRUG SALES FROM THE ROOM. UPON ARRIVAL, I ALONG WITH D/S BARDIS, MADE CONTACT WITH A BLACK FEMALE, MICHELLE GILLIAM. MICHELLE WAS INFORMED FOR THE REASON OF OUR PRESENCE AND EXPLAINED ON LY HER AND HER DAUGHTER WERE PRESENT. SHE THEN AGREED VERBALLY TO ALLOW US TO SEARCH. WHILE CONDUCTING THE SEARCH, I HEARD NUMEROUS NOISES FROM THE BATHROOM. UPON MAKING CONTACT AT THE BATHROOM WITH A BLACK MALE, PIERRE EVANS, I HEARD THE SOUND OF THE TOILET FLUSHING.

AFTER HE EXITED THE BATHROOM, I EXPLAINED TO HIM ASWELL THE REASON FOR US BEING PRESENT. PIERRE STATED HE HAD NOTHING ILLEGAL ON HIM AND CONSENTED TO A SEARCH OF HIS PERSON. UPON SEARCHING PIERRE, A CUT DOWN CIGAR TUBE WAS LOCATED ON HIM. INSIDE OF THE CIGAR TUBE WERE SEVERAL SMALL TRACE AMOUNTS OF SUSPECTED COCAINE. A PRESUMPTIVE FIELD TEST VERIFIED THE ITEMS TO BE COCAINE. PIERRE WAS PLACED UNDER ARREST FOR POSSESSION OF COCAINE AND POSSESSION OF DRUG PARAPHERNALIA, PURSUANT TO F.S.S 893.13(6)A AND F.S.S893.147(1).

D/S BARDIS CONDUCTED A SUBSEQUENT SEARCH OF THE ROOM, VIA THE VERBAL CONSENT GIVEN EARLIER FROM MICHELLE. IN THE NIGHTSTAND DRAWER HE LOCATED A SINGLE PIECE OF SUSPECTED CRACK COCAINE, ALONG WITH SEVERAL PIPES, COMMONLY USED FOR THE INTRODUCTION OF COCAINE INTO THE BODY VIA INHALATION AND SEVERAL HAND ROLLED CIGARETTES WHICH CONTAINED CANNABIS. THE SUSPECTED CRACK COCAINE WAS TESTED USING A REAGENT TEST, WHICH VERIFIED THE PRESENCE OF COCAINE. A REAGENT TEST ALSO VERIFIED CANNABIS WAS CONTAINED WITHIN THE HAND ROLLED CIGARETTES.

ALL ITEMS WERE ENTERED INTO EVIDENCE AT THE OSCEOLA COUNTY SHERIFFS OFFICE.

ALSO NOTED WERE THE CONDITIONS IN WHICH MICHELLE AND HER 11 YEAR OLD CHILD WERE LIVING IN. AT BEST COULD BE CONSIDERED DEPLORABLE. THERE WAS OLD FOOD LEFT ON THE SINK, WHICH APPEARED TO HAVE BEEN THERE FOR SEVERAL DAYS. THE ROOM HAD A FOUL STENCH, FROM OVERFLOWING GARBAGE AND ROTTEN FOOD. THERE WERE SEVERAL COCKROACHES AND OTHER INSECTS OBSERVED WHILE IN THE ROOM. AN OVER FLOWING PILE OF DIRTY CLOTHESMIXED IN WITH SOMEWHAT CLEAN CLOTHES, ALL WERE STACKED ON THE FLOOR. INSIDE OF THE REFRIDGERATOR WERE NO OBSERVED DRINKS, ONLY MOLDED OVER SPOILED FOOD. THE ONLY FOOD VISIBLE WHICH WAS POSSIBLY OK TO CONSUME WAS A FEW CANS OF SOUP AND ONE CAN OF OATMEAL.

THE JUVENILE WAS RELEASED TO HER FATHER, TONY MCNAMEE, WHO WAS NOT PRESENT AT THE TIME OF THE CONTACT. DCF WAS NOTIFIED VIA FAX.

BASED ON THE ABOVE, MICHELLE WAS ALSO CHARGED WITH CHILD NEGLECT, PURSUANT TO F.S.S 827.03, FOR FAILING TO PROVIDE A RESIDENCE WITH NORMAL LIVING CONDITIONS FOR HER CHILD, WHICH WOULD INCLUDE FOOD, WATER, AND NO SAFETY HAZARDS WHICH WERE CLEARLY PRESENT IE: CRACK COCAINE AND SEVERAL PIECES OF PARAPHERNALIA.

\*NOTE\* PIERRE IS CURRENTLY OUT ON BOND, FOR VIOLATION OF PROBATION, RELEASED 01-18-08. HE WAS HELD WITH A NO BOND STATUS\*

BOTH WERE TRANSPORTED TO OSCEOLA COUNTY CORRECTIONS.

Sworn to and subscribed before me, this <u>19</u> day of <u>JANUARY</u> , 2008	I swear/affirm the above statements are correct and true.	
Notary Public <input type="checkbox"/> Law Enforcement or Corrections Officer <input checked="" type="checkbox"/>		<u>Bardis, N</u>
Personally Known <input checked="" type="checkbox"/> Produced Identification <input type="checkbox"/>	OFFICER'S SIGNATURE	OFFICER'S PRINTED NAME (L,F)
Type of Identification: _____	Officer's Name Key: _____	Officer's Bus. Phone No. 407-348-1100

R-9492 SO-03-08

ORIGINAL







ZPaYDaY May 19, 2022 2:16 AM  
You prob has alt accounts follow you  
I would not post until we can get him in jail



nanny May 19, 2022 2:16 AM  
Ok



ZPaYDaY May 19, 2022 2:16 AM  
The child services watching you to  
Just don't use social media to fight  
Do it in court



I want you to win this  
But we got to be smart about it



nanny May 19, 2022 2:18 AM  
Ok  
On private now  
All of it private now  
Wyd



ZPaYDaY May 19, 2022 2:28 AM  
Can't be wait to go to Thailand  
Go through her phone  
To unveil so many guy she message  
So I can take gg with me and leaving her...  
Money stress me out so much



nanny May 19, 2022 2:29 AM  
U on now



Message @ZPaYDaY





Comments 22 Likes 532



markking41



Given the chance I'd love you every time Heather

1/30 Reply



ship4braines



Mommy! 🙏🏻 🌹🌹💕💕💕💕💕💕

1/30 Reply



shawnshilling336



and a 3rd 4th

1/30 Reply

View replies (1) ▾



davidmartin7856



you are absolutely 100 stunning and my favourite colour 😊❤️💕

1/30 Reply



daleterpstra0phun



Add comment...



101 comments



markking41



I think Donny needs to be beaten.  
You're amazing gorgeous

6

1d Reply

Liked by creator



therealheatherdeep · Creator



0

1d Reply



bigpun010203



what the fuc\$ is that?

0

8h Reply



summervibes2245



markking41



Awe too bad I am not him, I am the  
Federal Officer that's dating your ex

2

14h Reply

Comment access is limited. [View details](#)

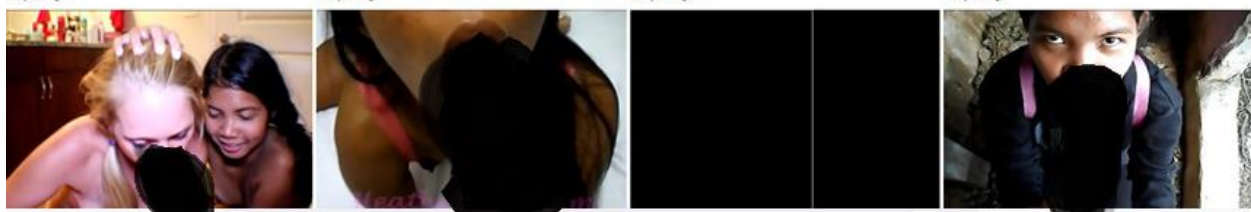




← → ↻ 🏠 🔒 <https://tubesafari.com/search/heather-deep> ☆ 🔍 🗄️ 📱 ☰

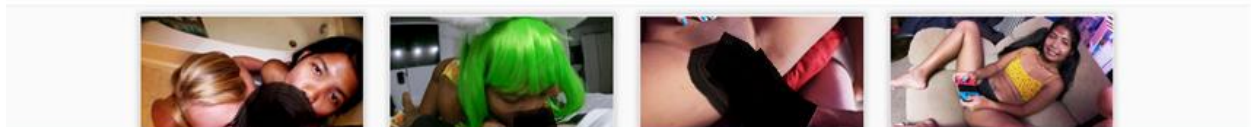
**Heather Deep Porn - 739** Popular New

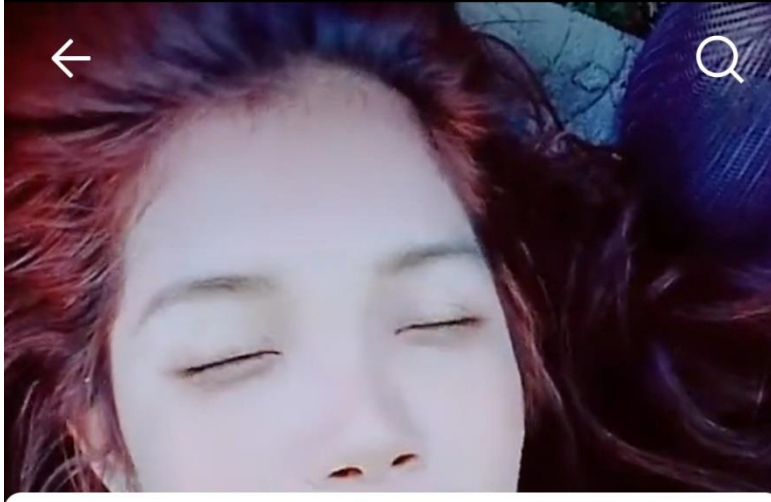
heatherdeep, madeincanarias, heather deepthroat, thai, heather deep creampie, depilation, heather deep pregnant, heatherdeep anal, heather deep anal, bokep indo, anal jesse, heather brooke, donny long, britney long, talangman



← → ↻ 🏠 🔒 <https://www.heatherdeep.com/index.php> 90% ☆ 🔍 🗄️ 📱 ☰

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13 comments



markking41



You do gorgeous mean absolutely everything to me. Missing you like crazy

1

39min Reply

Liked by creator



nancys\_28 · Creator



miss u 🥰👄

1

36min Reply



markking41 ▶ nancys\_28



You're utterly amazing baby, please be safe, happy and healthy 🥰

1

33min Reply

Liked by creator



nancys\_28 ▶ markking41



yes bb 😊👄

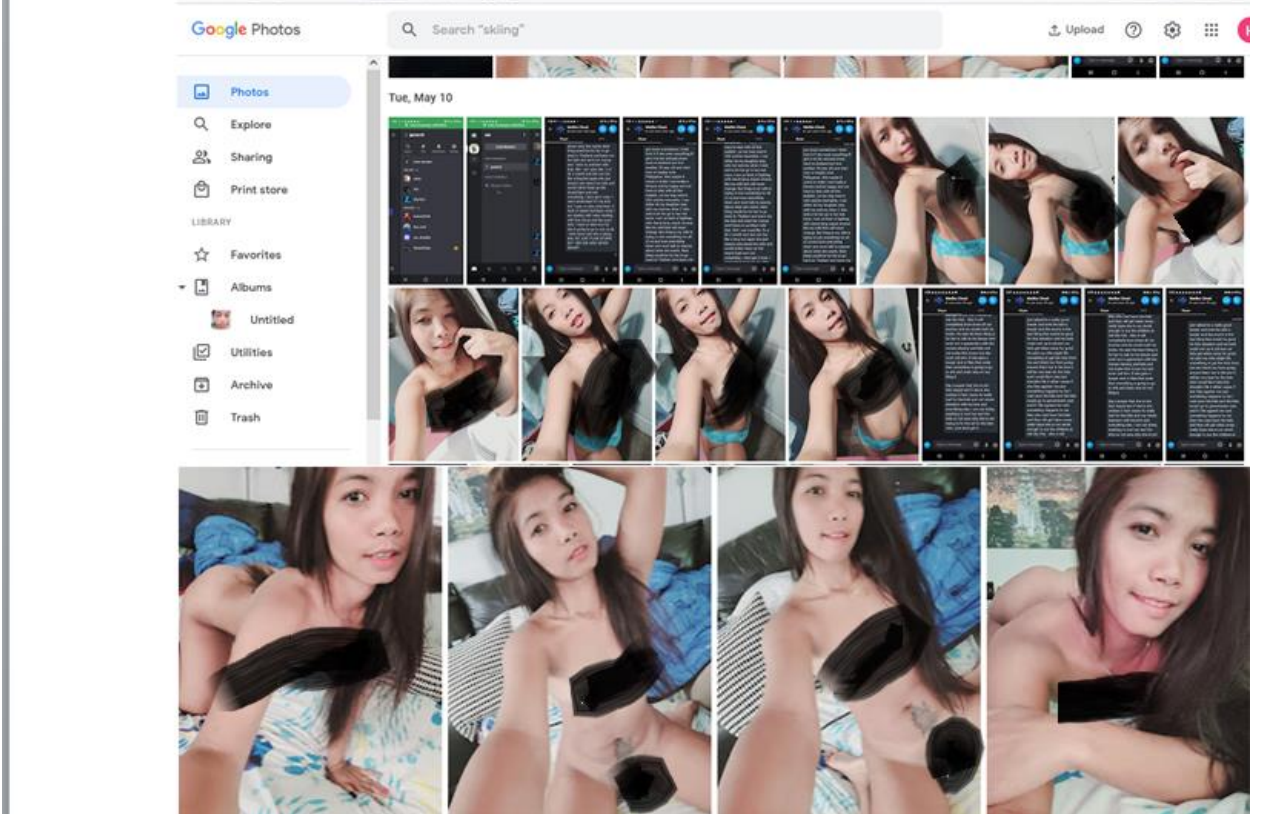
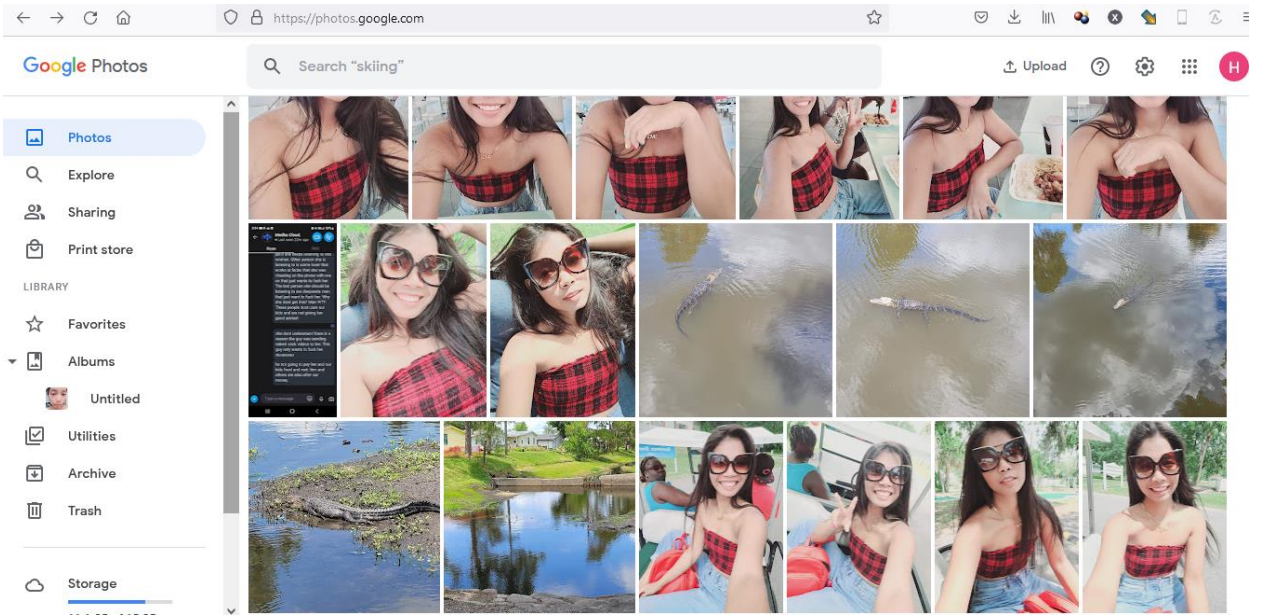
1

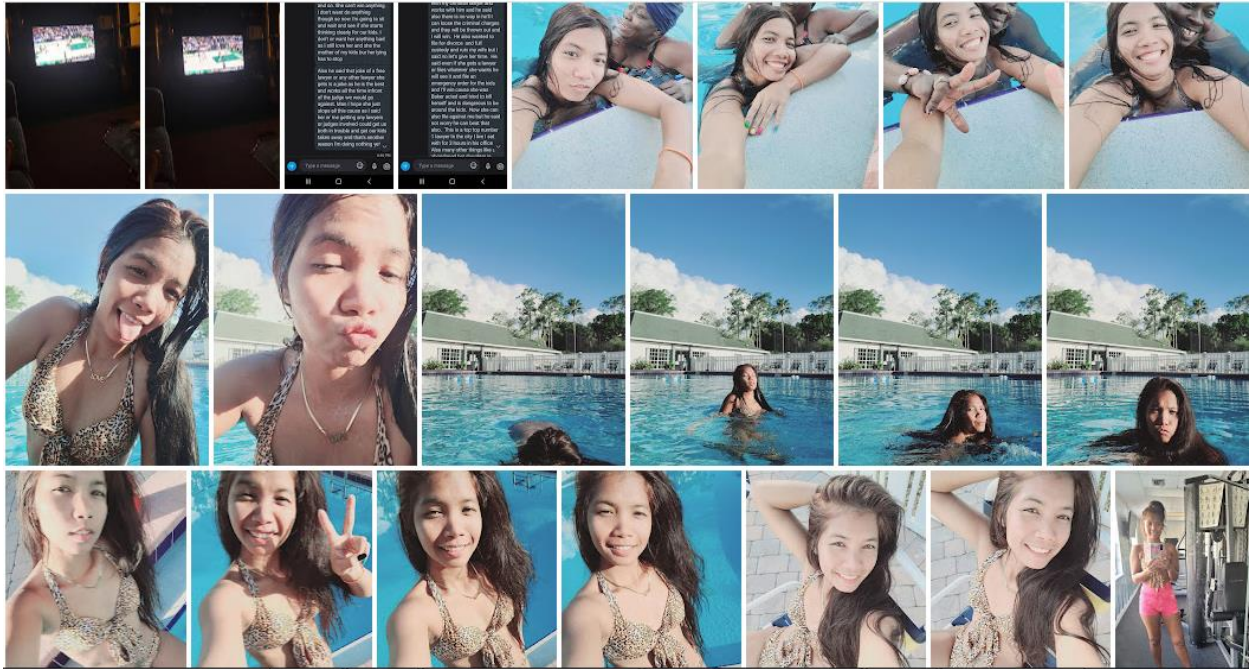
30min Reply



Add comment...







Navigation icons: back, forward, refresh, home, search, address bar, star, share, download, print, zoom, zoom in, zoom out, close, mobile, and refresh.

https://photos.google.com

Google Photos

Search "skiing"

Upload

- Photos
- Explore
- Sharing
- Print store
- LIBRARY
- Favorites







38 comments



markking41

Awe baby is waiting for me to get home. I miss you love but wrong bed, see you soon

13h Reply

Liked by creator



1



nancys\_28 · Creator

Love ya 😍 night night baby 😘



13h Reply

View replies (3) ▾



1



richsanders191

Good Night

15h Reply

Liked by creator



1



nancys\_28 · Creator



1



Add comment...





Comments 18 Likes 70



johnmccafferty08



donnys right ever thing he said is facts she was live last night n she was high as hell

13min Reply



User Name

Password

Save?

Login

## Fucking Around & Business

### Discussion>Everyones Favorite Loser: Donny Long Update

[MikeHawk923](#) 01:53 PM 08-31-2022

So apparently he really was living in a trailer park, his Wife left him for a member of her only fans and she was granted custody of the Kids after he beat the shit out of her.

Karma truly never forgets anyone.

Police Report Below

imgur dot com /a/jWnTZDg

I can't post/link an image until 30 posts, so if someone could be so



m.gfy.com/fucking-





62 comments



markking41



1

Wait, what, best friends forever. Awe I thought my baby wanted so much more

6d Reply

Liked by creator



nancys\_28 · Creator



1

you know I want more than that my love you my everything 🍷💕👄

6d Reply



markking41 ▶ nancys\_28



1

Yes baby my wife, mother of my children, I got you my love

6d Reply

Liked by creator



Add comment...





95 comments



6/6 Reply



markking41



1

Baby I know your heart is happy and breaking. You know that everything is alright, and we'll get the babies back.

6/6 Reply

Liked by creator



nancys\_28 · Creator



6/6 Reply



nedkelly65



1

The pain and heart break is what makes you the strong mother that you are. Believe that you can fix your problems



Add comment...



## Contact Note

Date and Time: July 8, 2022 11:43PM

Patient: [REDACTED]

### Contacted Party

Name: Stacy Seane  
Relationship to Patient: Self

### Method of Communication

In Person

### Reason for Communication

Counseling to help with trauma and abuse issues.

### Billing Information

The patient will not be billed for this communication.

### Communication Details

[REDACTED] started her treatment on 23rd of June of this year. She has been seen twice a week since the last two weeks.

[REDACTED] has been talking about her life since the family lived in Thailand and then they moved to different countries and finally arrived in United States. [REDACTED] shared with this counselor things about her step mother and the abuse she was subjected to. [REDACTED] reported that before she found out that the step mother was not her real mother, her step mother was very abusive to her. [REDACTED] reported that her step mother used to punch her and slap her in the face, arms and legs, and sometimes smack her in the face, and would say she was not her daughter. She reports that the step mom would treat her two children differently and let them have Peppisides before dinner and not give her one. She said the other two kids blamed everything on her and the step mom would punish her. [REDACTED] stated that the step mom would often go to the neighbor's house and smoke with her and would leave her to baby sit the younger siblings.

[REDACTED] talked about the time when her step mother would have a fit and will beat herself on the face and once she had a black eye and blamed it on the husband. [REDACTED] also talked about this DCF investigator name Jazelle who asked [REDACTED] a few questions and when [REDACTED] told her the truth, the case worker stated "your Dad is training you well."

[REDACTED] also talked about some of the times when her stepmother would feed the two younger kids very late and they would be waiting to be fed breakfast. [REDACTED] also remember that her step mom would go outside and smoke cigarettes and marijuana with the neighbor lady and would tell dad that she was inside with the kids but [REDACTED] says that the three of them were alone in the house when Mom was outside. This was during the time her Dad was in Miami taking care of his Dad. [REDACTED] also reported that at times her step mother will go shopping and will leave the kids alone and tell the Dad that she was home all the time.

[REDACTED] talked about how her step mother was texting several guys in Thailand and one in Illinois and she was sending money to all of the guys in Thailand. [REDACTED] also talked about the time when [REDACTED] went to the neighbor's house to tell them to call 911 because the step mom was arguing with Dad and the neighbor lied and told the 911 operator that Dad was hitting step mom and had threatened to kill step mom.

[REDACTED] Reports that on one occasion, they were riding the golf cart with Mom and Michelle, the neighbor lady in the front seat and the three children in the back, and [REDACTED] could smell the smell of marijuana, she saw them passing it back and forth. The three of the kids were watching them smoke.

In my professional opinion of practicing 20 plus years, as I have tried to determine if [REDACTED] is being coached or is she telling the truth, I feel that she appears to be telling the truth.

[REDACTED] Licensed Mental Health Counselor, License [REDACTED] signed this note and declared this information to be accurate and complete on July 11, 2022 at 4:45PM.



Date and Time: July 25, 2022 7:42PM

**Contacted Party**

Name: [Redacted]  
Relationship to Patient: [Redacted]

**Method of Communication**

In Person

**Reason for Communication**

Counseling

**Billing Information**

Time spent: 60 minutes  
The patient will not be billed for this communication.

**Communication Details**

On July 22nd, 2022 I drove with [Redacted] and his daughter [Redacted] to Kissimmee Police station to pick up the two younger children, [Redacted] and [Redacted] for weekend visitation with their father. As he has not had contact with them in about a month and he did not want to be accused of coaching the children or having them lied. I was with them from the time we picked up the children, till we got to my office and made the call to the abuse hot line.

A visual inspection of any marks on the body was conducted. [Redacted] had multiple scratches on his arms and [Redacted] had scratches on her leg.

Children were transported to Palm Bay to my office and I spoke to the children during our ride. This is what was uncovered. [Redacted] reported that his mother engages in using marijuana and drinking beer with the neighbor lady and has left him alone at home at least on one occasion.

According to [Redacted] this activity goes on on daily bases during the day and at night. [Redacted] also disclosed that he has not been in a car seat since he has been with his father, and the mother has been transporting the children in ubers without car seats. [Redacted] also reported that mother's boyfriend Neil only has one car seat for [Redacted] and not one for [Redacted]. He also disclosed that they were brought to the police station, and to the court house the day before, in ubers without car seats. According to Andrew multiple men are coming to the house, smoking marijuana with mom and laying in daddy's bed and hugging and kissing mom. [Redacted] also reported that men have been giving her money.

[Redacted] has reported that Neil (a man she met on tik tok) has been telling him that Daddy does bad things and hits mommy. When asked if he has ever seen daddy hit mommy, he said no. When asked if he has ever seen Mom hit [Redacted] he said yes. He said he has seen mommy hit [Redacted] a lot, with her hands. When asked if mom leaves the two kids alone with her boyfriend, he said yes. He also said that mom shakes her butt in her underwear in front of the camera for her tik toks.

In my 20 plus experience of working with children, I feel that the child appears to be telling the truth.

[Redacted] Licensed Mental Health Counselor, License [Redacted] signed this note and declared this information to be accurate and complete on July 25, 2022 at 8:24PM.





[REDACTED]

card to take both of them shopping with ne safety features like seat belts or closed in sides.

[REDACTED] also shared that mom often wears her underwear and makes videos for her TIK TOK page and she is dancing in front of the camera and the kids.

[REDACTED] also shared that Mom and Neal often continue to talk bad about daddy that Daddy is bad because he hit Mommy.

[REDACTED] also shared that his mom sleeps in her underwear with Neal hugging and kissing while [REDACTED] is in the same bed with them.

[REDACTED] shared that the little [REDACTED] has been saying bad words like "shake that Booty" and the two kids rub their bottoms together as if they are copying Mom and mom gets upset and hits them.

[REDACTED] has also agreed that she often sleep in bed with mommy and Neal.

These things that [REDACTED] shared are very upsetting to their father. And the fact that he cannot eat is also upsetting for his older sister Stacy.

I am hoping that court will take these facts into consideration to help these two young children and may be put more restrictions on the mother such as supervised visits or less time with her until she learns to follow the court order.

[REDACTED]





[REDACTED]

To whom it may concern

[REDACTED]

I am writing this on behalf of minor children [REDACTED] and [REDACTED]. Their father has been very concerned about a few things that [REDACTED] shared with me about what goes on while he is at his mother's house. Last week [REDACTED] was playing at the neighbor's house in the screened porch while mother was out in the back with the lady Michelle doing Bar BQ. [REDACTED] fell and two of his front teeth became loose.

His mother did not do anything and did not take him to the dentist the whole week. [REDACTED] had a bruise on his lip and was in pain and could not eat. When he came to his father's house a week later, he was unable to chew his food and complain of it hurting when he tried to eat. His step mother had to cut the food in small pieces and put it in the back of his mouth to help him eat. Mr. [REDACTED] took him to the dentist the next day and he has to go back to get those teeth pulled.

[REDACTED] also shared that he is often left with the neighbor Michelle for babysitting while the court order clearly states that the kids are not to be left alone with that lady.

[REDACTED] also shared that at times he is left with Michelle and mom's boyfriend Neal.

[REDACTED] also stated that he and his sister [REDACTED] have gone grocery shopping with Michelle in her car with no car seats. And that his mother would drive the golf



[REDACTED]

[REDACTED]

Date: 7/4/2023

[REDACTED] was seen in my office on June 23rd. His father brought the kids to my office so I can talk to them and ask few questions. His father was told by the mother and her attorney that the [REDACTED] was acting inappropriately. [REDACTED] was asked if he was behaving inappropriately and exposing his private parts. He immediately became very angry and embarrassed and said he was doing that, and it was his mom who was making naked videos for [TikTok](#). Client did not want to talk about this anymore and he was left alone.

Later on father called the authorities and reported all that to the police and DCF. [REDACTED] was very traumatized and hid under the couch when the police arrived, and they could not find him for a long time. He was reported missing and the helicopter were sent to look for him but he turned up from under the couch later on. [REDACTED] also threatened his two sisters, that he was going to kill everyone and will make the house his own. Since then client has not exhibited any inappropriate or abnormal behavior.

[REDACTED] was seen again today via video and appeared very happy and was smiling. He seemed to have lost two teeth due to an accident where he and his sister ran into each other and he lost two teeth and the sister had a bruise on her forehead. The father took them to ER and they were fine.

[REDACTED] is looking happy now and is staying with the father after he was granted temporary custody of the two children.

[REDACTED]

To whom I may concern,

I am writing this letter on behalf of my good friend and neighbor that I have known for over a year. Since we have spent family time with each other families and my daughter and my son would go over to play with Donald kids, my husband and I would even let my daughter and his daughter have sleep over and they are very good friends.

Donald and his Fiancé are always very involved and make sure his 4 kids have what they need in the house and we have always seen Donald very involve and protective towards his children and make sure their wellbeing and safety was always first. Has our family relationship developed Donald kids got really close to ours so we spend more times at least either eating dinner together or Donald always inviting us over for a cook out?

I am also very close to his Fiancé and Donald youngest Son so both myself and Donald fiancé spend quality time with the children and even Donald played with the kids so my family always enjoyed our time there, But or a more serious time there was one morning that his son was missing and Donald could not find him so he called 911 worried that he ran away because prior to his disappearance he was acting out towards the family and saying he wanted to leave and just being mean to his sisters and to his Step Mother, so Donald tried to ask his son what wrong buddy? He kept on saying nothing (I can't tell you) Donald kept asking him "what can't you tell me"? But his son just didn't say anything and that's when Donald came to my house and asked if we could help him eventually we found him and 911 arrived so myself, and the kids and the Step Mother where in the house while Donald spoke the officer that arrived at that point I was asking Dons son what was wrong and he ran to his room. Donald finish talking to the officers and so Donald and I went to his son room to see if he was ok and told him that he wasn't in trouble but we just needed to know what caused him to be so upset that morning but he refused to talk to us so Donald ask me if I wanted to try and ask him so I went to give his son a hug and told him he be ok and asked him what was wrong? He started by telling me he scared so I ask him do you like Daddy and he said yes, Do you like it here living with Daddy he said yes, and I asked him if he like at mommy house and he said yes also but he said mommy will be mad at me, So I asked him why would mom be mad at you? Did you do something? He said no mommy said not to say anything, I asked him about what? He response about her doing tiktok so I told him why can't you tell Daddy about her tiktok he said mommy said I can't tell Daddy about her tiktok so I ask what was wrong with her doing tiktok, Andrew said that mommy does tiktok videos with no clothes on and shake her butt, mommy said I can't tell Dad so I don't want to get in trouble, so at that point we came out at Andrews room and went to Don to share what Andrew told me. We told Andrew that he wouldn't be in trouble he also shared with me and Donald that mommies Boyfriend isn't nice to him and hit him we ask to show us where he hits you so he showed us and he pointed towards his mid back while mom saw the Boyfriend hit Andrew.

I believe that these children were taken from a safe and loving home where they all enrolled in school and Donald make sure all their needs where always meet and its breaks my heart to see that Donald got

his children taken from him when he was been there and nothing but a responsible father to his children, We the Brunelle Family care deeply for them and would love to see those babies be return to their father so please allow him to speak his truth.....

Sincerely,

Berkys Brunelle

Affiant's Signature Berkys Brunelle Date 9/11/23

NOTARY ACKNOWLEDGEMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which the certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of Florida

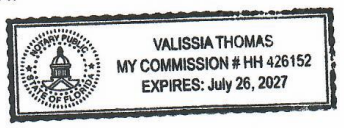
On ~~September 11th~~ 11th 20 23, before me, Berkys Brunelle, personally appeared who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the state of Florida that

The foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Valissia Thomas



Notary Public

Valissia Thomas


Print

Affiant's Signature Berkys Brunelle Date 9/11/23 (SEAL)

STATE OF FLORIDA COUNTY OF Orange  
The foregoing instrument was acknowledged before me this  
11th day of September, 20 23, by  
Berkys Brunelle  
Personally Known \_\_\_\_\_ OR Produced Identification   
Type of Identification Produced FL Driver's License

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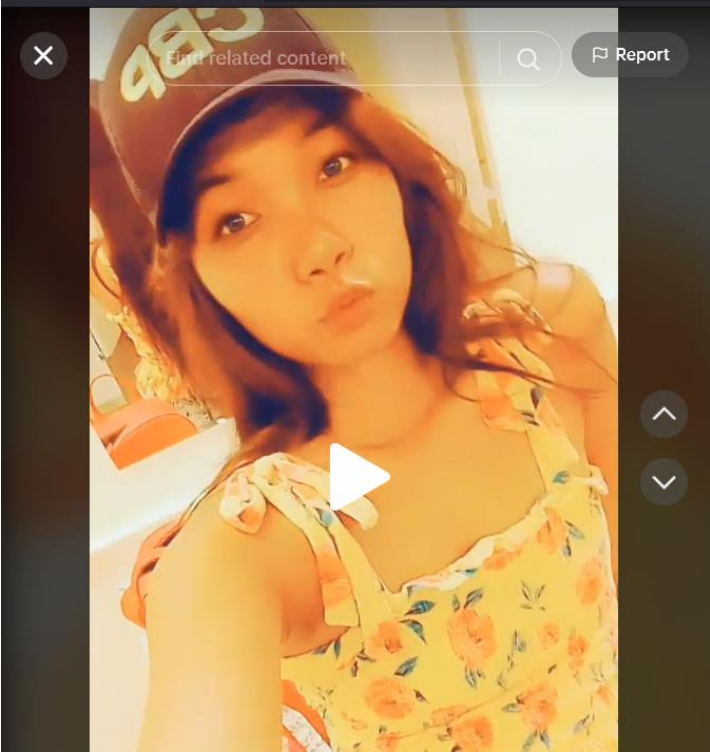
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-  **Quinn Quello**  
just so beautiful  
2022-6-7 Reply
-  **Niedermann Hansjörg**  
i realy love you 🤩🤩🤩🤩🤩🤩  
2022-6-5 Reply
-  **SKI**  
heyyy Heather how are you doing I hope  
everything is okay with you  
2022-6-1 Reply
-  **calvindainty851**  
hi babe i ❤️ you. morning

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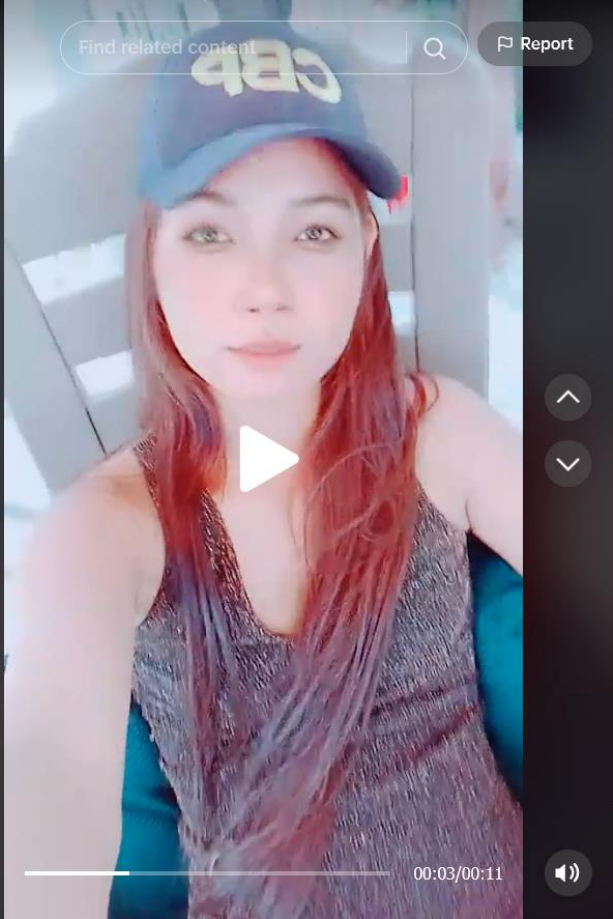
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-  **Mark King**  
Wow gorgeous you look absolutely breathtaking in that hat. Miss you so much  
2022-6-2 Reply
-  **SuperMack**  
SLEEP WELL SUNSHINE ❤️❤️  
2022-6-2 Reply
-  **PS**  
Perfection! 🥰🥰  
2022-6-2 Reply
-  **Forty Seven**  
🥰🥰🥰🥰🥰🥰  
2022-6-3 Reply
-  **tdsportz**  
Goodnight. Sleep well, sweet dreams  
2022-6-3 Reply
-  **Steve S229**  
yum yum  
2022-6-2 Reply
-  **Tonyt**  
you are so beautiful can I be your boyfriend

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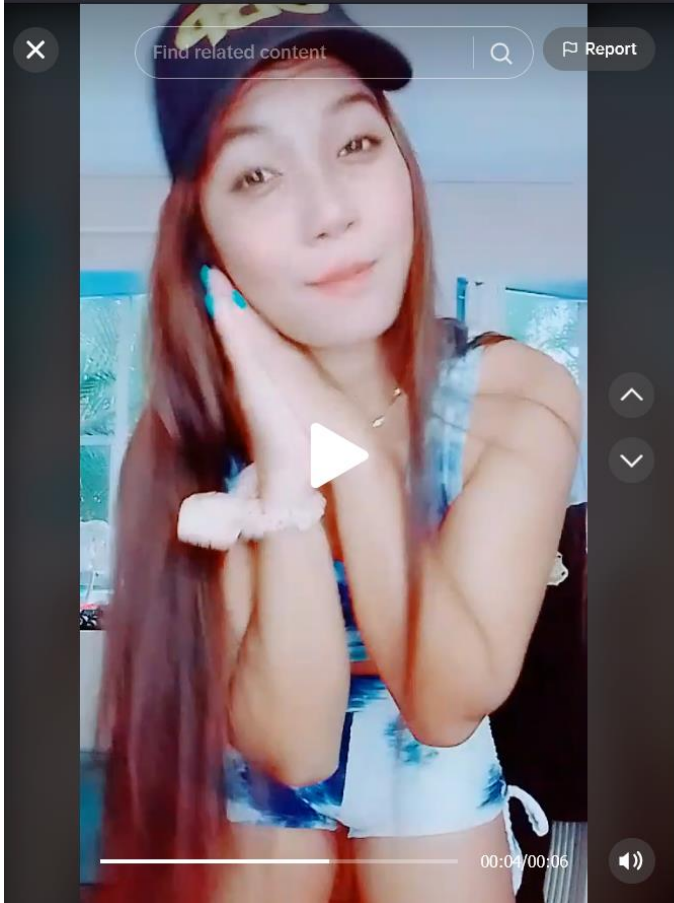
Creator videos

-  **reg...**  
Making movies 😊  
2022-6-7 Reply
-  **Mark King**  
Really baby wonder what you've been busy doing 😊  
2022-6-7 Reply
-  **marty**  
hi beautiful glad you are looking like really happy now stay strong beautiful here for you if you need to talk to someone ❤️❤️❤️  
2022-6-7 Reply
-  **Dean**  
you look much better  
2022-6-7 Reply
-  **Dean**  
you ok  
2022-6-7 Reply
-  **benthansen6**  
❤️❤️❤️  
2022-6-7 Reply
-  **davidmorgan72520**  
ลูกคนสวย  
2022-6-7 Reply

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- reddogrewiston**

2022-6... Reply

♡

1

**Mark King**

Yes gorgeous, new life, new beginning and new love

2022-6... Reply

♡

2

**Quinn Quello**

you are so beautiful. wishing you nothing but the best

2022-6... Reply

♡

2

**22 magnum**

Good 👍

2022-6... Reply

♡

1

**tdsportz**

I'm happy that you're happy!!!

2022-6... Reply

♡

1

**Tim**

great smile!❤️

2022-6... Reply

♡

1

**Jerome Shibley**

that is great to hear wish you all the best 🍀🍀🍀

2022-6... Reply

♡


1

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 **Mark King**  
Wow gorgeous you sure to love to be cruel.  
You're breathtakingly gorgeous  
2022-6... Reply


 **Quinn Quello**  
GORGEOUS  
2022-6... Reply

 **SKI**  
good evening heather you have such a beautiful  
smile God bless  
2022-6... Reply

 **Mike\_McS**  
you look so hot  
2022-6... Reply

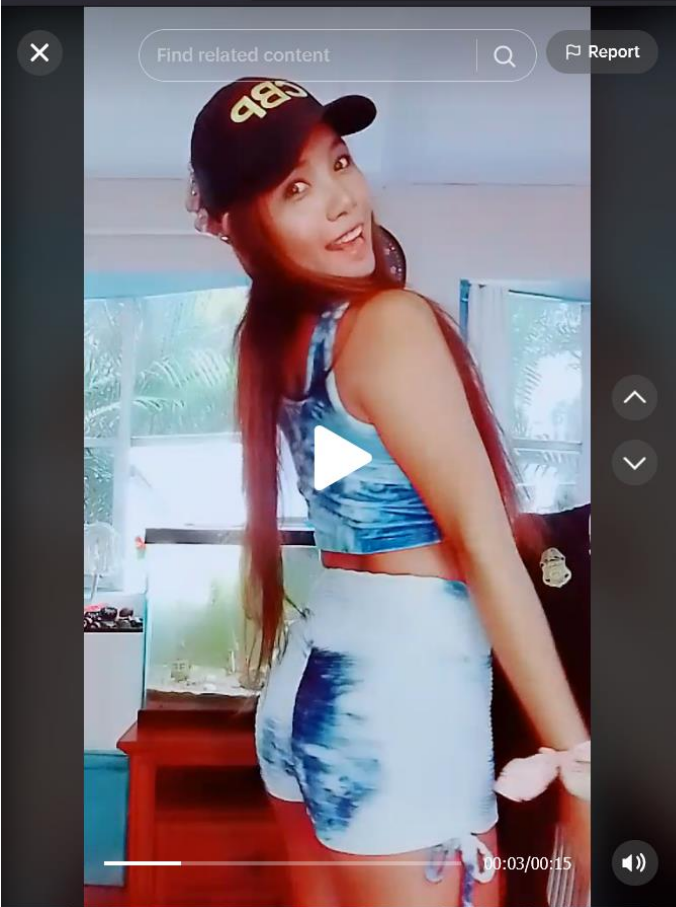
 **Dan**  
I love you  
2022-6... Reply

 **iSpecINT**  
😂😂😂  
2022-6... Reply

 **marty**  
stunning beauty yes plz 🥰🥰🥰🥰🥰

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Comments (26)

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-  **Quinn Quello**  
GORGEOUS  0  
2022-6... Reply
-  **mk123**  
What is CBP?  0  
2022-6... Reply
-  **Mark King**  
You're an absolute heart stopper. Miss you baby  1  
2022-6... Reply
-  **gaylonhathcock**  
you truly are and amazing young lady 🥰💕  1  
2022-6... Reply
-  **benthansen6**  
Very nice 😊  1  
2022-6... Reply
-  **tdsportz**  
Hope you will an amazing week 😊  0  
2022-6... Reply
-  **William Brockensick**  
👍👍👍❤️  1  
2022-6... Reply

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 **Mark King**  
I love that smile gorgeous and I think you're perfect


2022-6... Reply

 **Quinn Quello**  
so beautiful


2022-6... Reply

 **Michael**  
That right don't ever worry about what other people say and keep being authentic because that's the best you 🥰


2022-6... Reply

 **Adrian Dorizac**  
hello, I'm nobody 🤔🤔🤔🤔🤔🤔

2022-6... Reply

 **tdsportz**  
You'll never please everyone. Always start with self love and the right ones will be there

2022-6... Reply

 **nacho420libre**  
hello princess


2022-6... Reply

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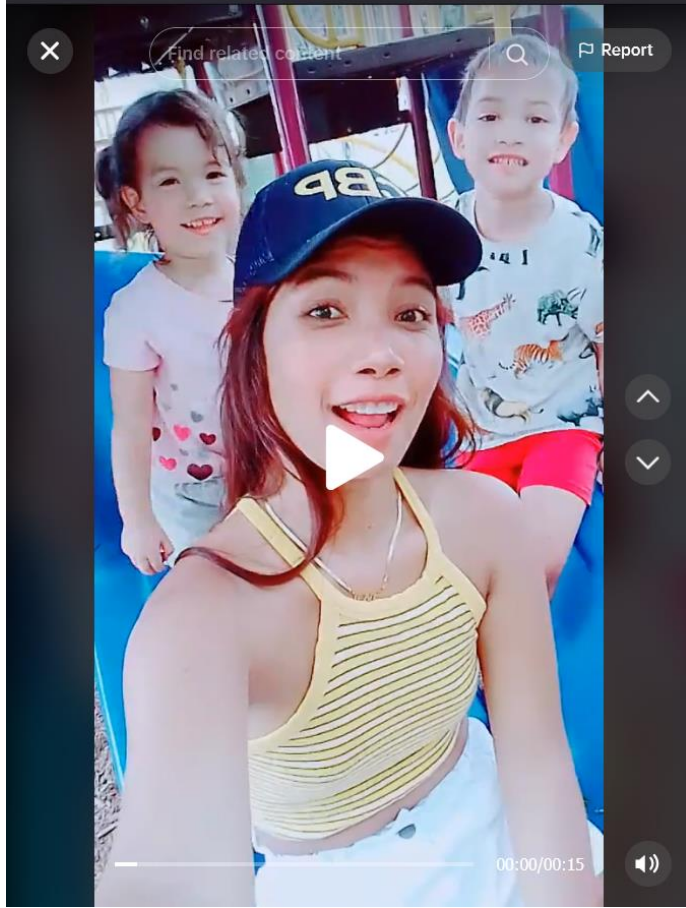
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- Palle Gammelby**  
🥰 Happy Family 🥰 How lovely to see 🥰 love it 🥰  
have a great day Palle from Danmark 🇩🇰  
2022-8-... Reply
- blairgaskins1**  
🥰🥰  
2022-8-6 Reply
- Max Lopez8178**  
Beautiful  
2022-7-... Reply
- thorsox**  
soooooooooo cute

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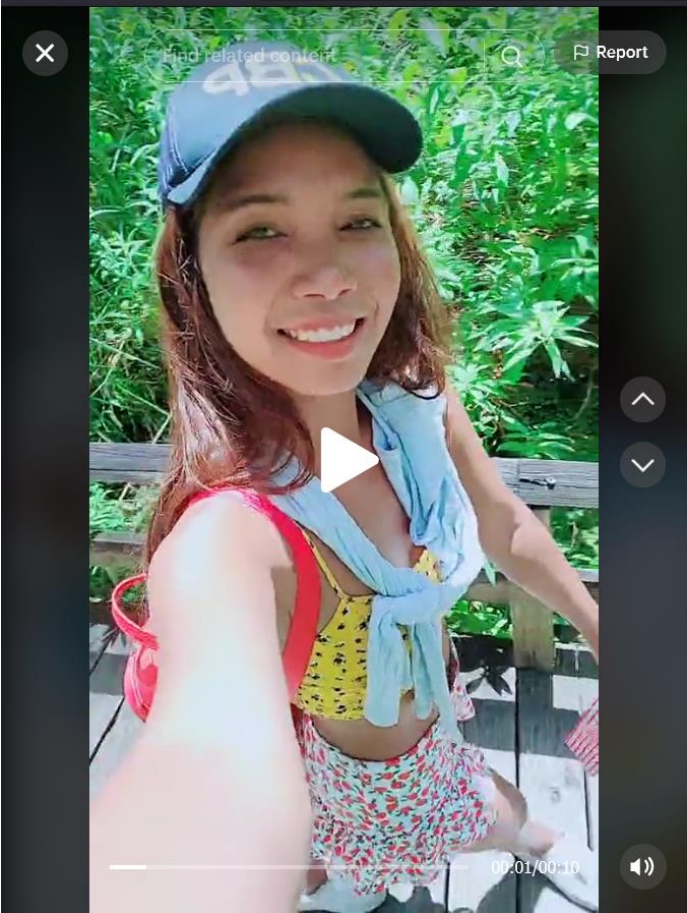
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**Comments (37)** Creator videos








-  cute boy and girls happy  
2022-6-... Reply 3
-  Mark King  
That's the most beautiful sight. Kids being happy without a warden telling them to smile  
2022-6-... Reply 1
-  mk123  
👏 PROUD MOMMY 🥰  
2022-6-... Reply 1
-  gaylonhathcock  
can not get enough of those beautiful smiles you look so happy beautiful angel  
2022-6-... Reply 1
-  Michael  
Awesome have fun with the kids  
2022-6-... Reply 1
-  Michel  
Contagious smile...enjoy the good times 🥰  
2022-6-... Reply 1
-  reddoglewiston  
👏👏  
2022-6-... Reply 1
-  Quinn Quello

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-  **Mark King**  
You and the Banana are so admitt you gorgeous 🍌❤️  
2022-8-... Reply 1
-  **mws4137**  
🍌🍌🍌🍌🍌  
2022-8-... Reply 0
-  **Billy**  
that's the best feeling in the world being with your kids  
2022-8-... Reply 0
-  **William Brockensick**  
🍌🍌🍌🍌🍌  
2022-8-... Reply 1
-  **silverado9171**  
🍌🍌🍌🍌  
2022-8-... Reply 0
-  **Scott Wood**  
Just love you 🍌🍌🍌🍌  
2022-9-5 Reply 0
-  **Scott**  
Prettiest woman on the planet 🍌  
2022-8-... Reply 0

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👤❤️❤️❤️  
2022-9-6 Reply 1

👤 **Mark King**  
Wow baby, I like my version better, but you're always absolutely gorgeous. I love you so much goodnight love.  
2022-9-6 Reply 1

👤 **FALLENSUN** 🌊  
👍👍👍  
2022-9-6 Reply 1

👤 **mk123**  
Thank you. 🥰 It's a fantastic smile. 😊 Good night. 🥰  
2022-9-5 Reply 1

👤 **Mike\_SoCal**  
👍👍👍👍👍  
2022-9-5 Reply 1

👤 **4Eyed**  
Love your smile .. Keep Smiling ThaiGirl 🥰🥰  
2022-9-5 Reply 1

👤 **user3450539965919**  
👍👍👍  
2022-9-5 Reply


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**Comments (14)** Creator videos

2022-9-... Reply 0

**FALLENSUN** 🌊  
👍👍👍 1

2022-9-... Reply 1

**Mark King**  
I don't like to see my baby sad or crying. I hope I am the one that you need baby. Love you so much 1

2022-9-... Reply 1

**MoanCH** 🇺🇸  
Good morning pretty lady 🍷🍷🍷 0

2022-9-... Reply 0

**Brian Loco**  
hey hun. everyone needs love. Keep your heart open 1

2022-9-... Reply 1

**Quinn Quello**  
so beautiful 1

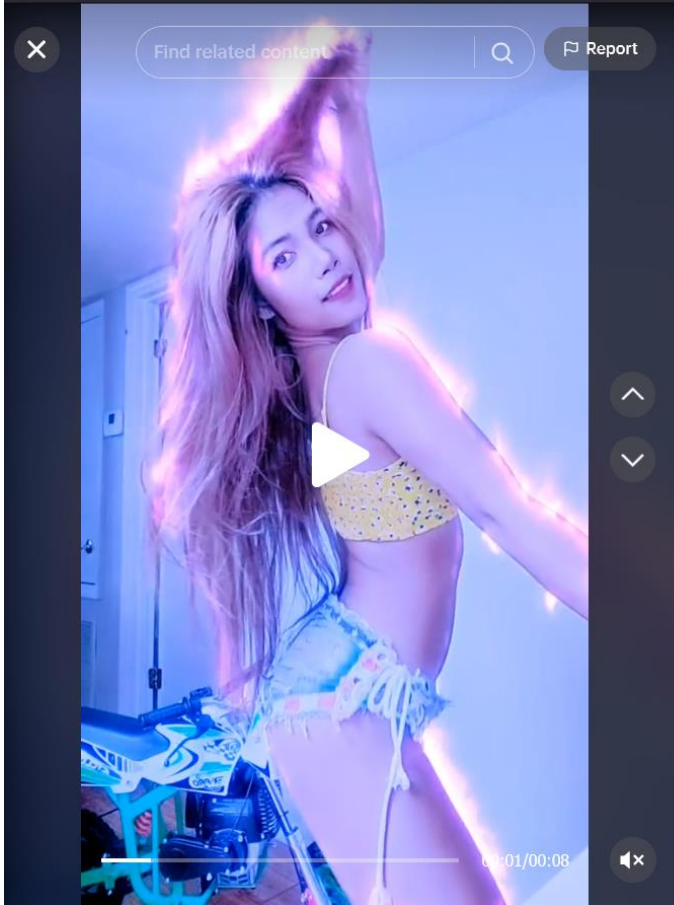
2022-9-... Reply 1

**MrGrinch376**  
1st 🍷🍷🍷 1

2022-9-... Reply 1








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Comments (53)

Creator videos


-  **Mark King**  
Uh huh so baby is choosing violence today. This is what happens when I am not around. I love you gorgeous and miss you so much so much  
2022-10... Reply  
View 2 replies
-  **Douglas Harrison**  
nice 🍷  
2022-10... Reply
-  **Calvin Dainty**  
wow you're on fire 🔥🔥🔥🔥🔥  
2022-10... Reply
-  **👉Tata👈babes**  
I.love it  
2022-10... Reply
-  **jake**  
you are getting better & better.  
2022-10... Reply
-  **Tracy Graham**  
are you in the US or Thailand?  
2022-10... Reply
-  **Troy Caniete478**  
wow beautiful dance

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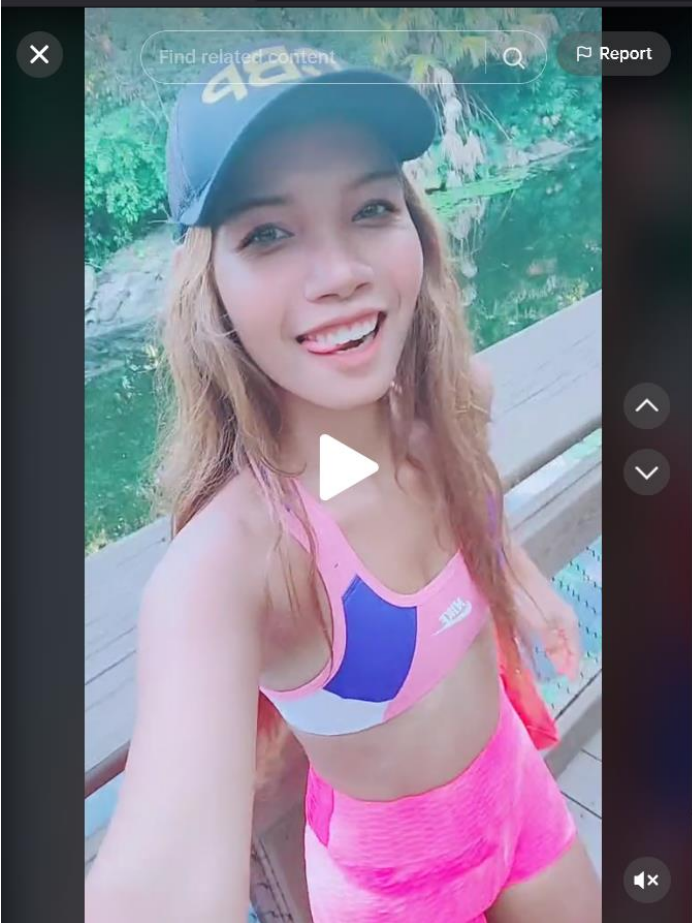
### Comments (25)

Creator videos








-  🍌🍌🍌  
2022-10... Reply 0
-  mws4137  
😂😂😂  
2022-10... Reply 0
-  1angrychef  
Sexy 🍌🍌🍌  
2022-10... Reply 0
-  Terry  
hey sexy 🍌🍌🍌  
2022-10... Reply 0
-  rickd1118  
sexy 🍌  
2022-10... Reply 1
-  NKYGuy423  
🍌🍌🍌  
2022-10... Reply 0
-  Mark King  
I see my baby misses me wearing my hat looking all adorable. I love you and miss you my heart  
2022-10... Reply 1

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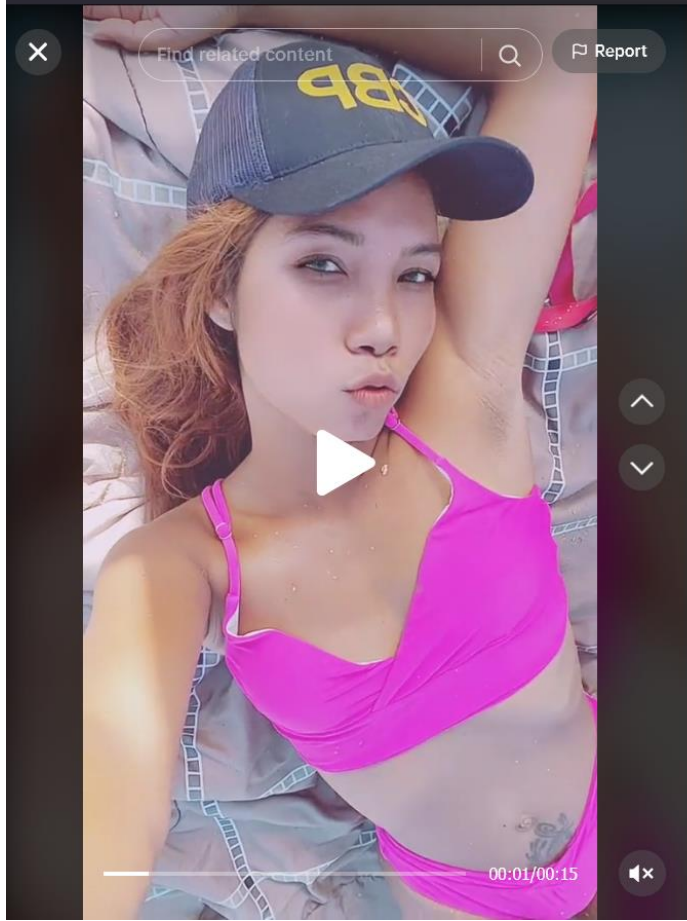


**Comments (52)** Creator videos








-  **user2806868843185**  
Gorgeous hope you have a good weekend  
2022-10... Reply
-  **user2806868843185**  
❤️❤️❤️  
2022-10... Reply
-  **John White353**  
Looking beautiful sweetheart 😍  
2022-10... Reply
-  **Quinn Quello**  
one incredibly beautiful woman  
2022-10... Reply
-  **Chico**  
Hi beautiful 😍😍😍  
2022-10... Reply
-  **mws4137**  
😍😍😍😍  
2022-10... Reply
-  **Jordannicholls330**  
Beautiful 😍  
2022-10... Reply

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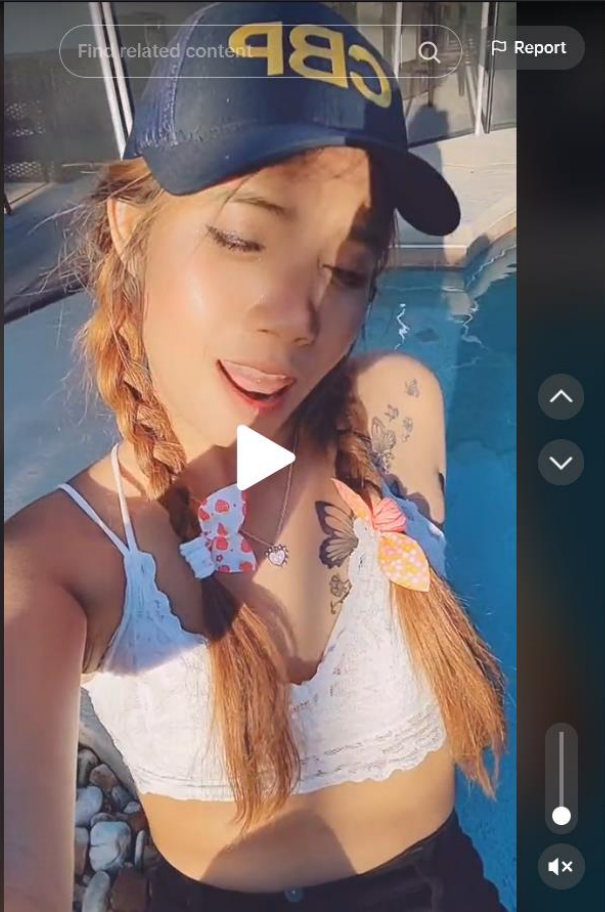
**Comments (44)** Creator videos

-  **DJ Hansjörg Switzerland** 🇨🇭  
Good night from the 🇨🇭. Switzerland. Have a nice evening, beautiful woman, sweet dreams 🥰🥰  
2022-10... Reply ♡ 1
-  **Me**  
If I was the blanket you're lying on I would wrap you in the biggest hug you ever had. 🥰🥰🥰.  
2022-10... Reply ♡ 0
-  **jake**  
xoxo  
2022-10... Reply ... ♡ 0
-  **user Rusty**  
hi sexy  
2022-10... Reply ♡ 1
-  **Zbyněk Moučka** 🇨🇪  
🥰🥰🥰🥰🥰🥰🥰🥰🥰🥰🥰🥰  
2022-10... Reply ♡ 1
-  **Joel Hernandez**  
heavenly Heather.....  
2022-10... Reply ♡ 0
-  **steve0555**  
Hopefully all is well after lan  
2022-10... Reply Back to top

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👍👍👍  
4-13 Reply 1

**Nancy's 28 · Creator**  
👍👍  
4-14 Reply 0

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**Mark King**  
Looking absolutely gorgeous my love, first. I so fought the urge to push you in baby  
4-13 Reply 1

**Nancy's 28 · Creator**  
No then I will get wet punk baby 🤔🤔🤔  
4-13 Reply 1

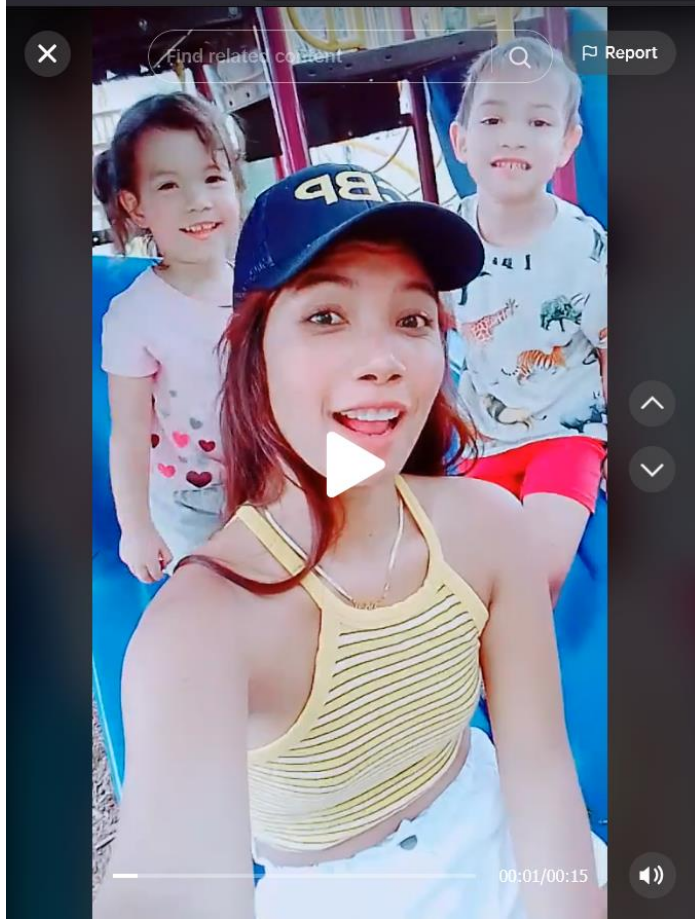
**Nancy's 28 · Creator**  
shhhh come find me 🤔🤔🤔🤔  
4-13 Reply 1

**Mark King**  
Lol, left you speechless my gorgeous love. You're so cute when you're blushing  
4-13 Reply 1

**Nancy's 28 · Creator**  
🤔🤔🤔🤔🤔  
4-13 Reply 1

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Comments (37) Creator videos

-  **Mark King**  
That's the most beautiful sight. Kids being happy without a warden telling them to smile  
2022-6-... Reply
-  **mk123**  
🥰 PROUD MOMMY 🥰  
2022-6-... Reply
-  **gaylonhithcock**  
can not get enough of those beautiful smiles you look so happy beautiful angel  
2022-6-... Reply
-  **Michael**  
Awesome have fun with the kids  
2022-6-... Reply
-  **Michel**  
Contagious smile...enjoy the good times 🥰  
2022-6-... Reply
-  **reddoglewiston**  
🥰🥰  
2022-6-... Reply
-  **Quinn Quello**  
beautiful mom and babies  
2022-6-... Reply

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**Comments (30)** Creator videos

-  you make my day when I see you  
2022-6... Reply
-  miketurpin698 Mike  
you're so cute young lady  
2022-6... Reply
-  Matrix231  
Many want to love u  
2022-6... Reply
-  PS 🍷🍷🍷  
2022-6... Reply
-  Mark King  
I love you so much baby, I miss you so much gorgeous  
2022-6... Reply
-  Quinn Quello  
so beautiful  
2022-6... Reply
-  user109791  
Love at first sight when it came to you 🍷  
2022-6... Reply


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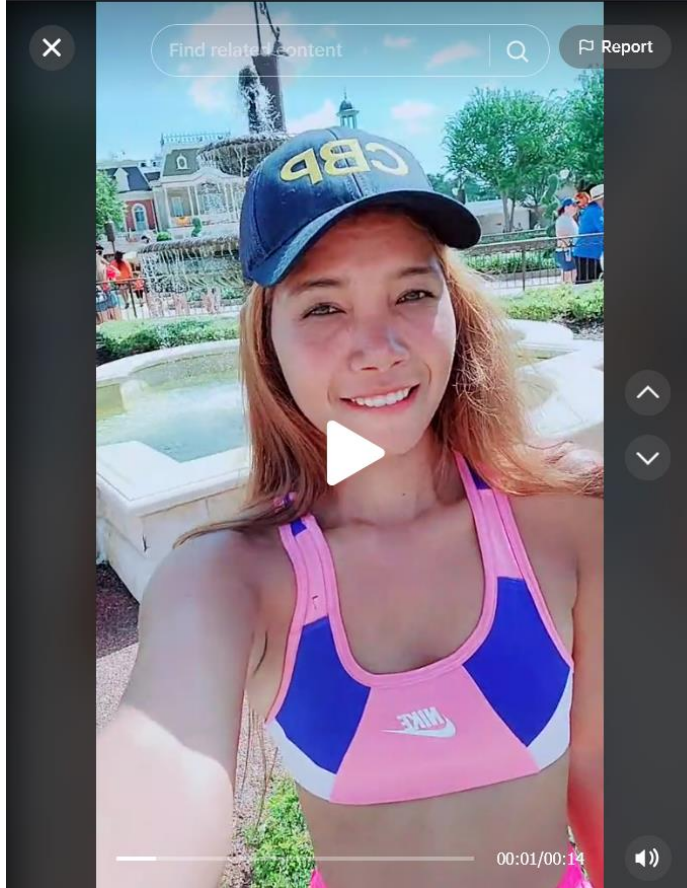
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Comments (23) Creator videos

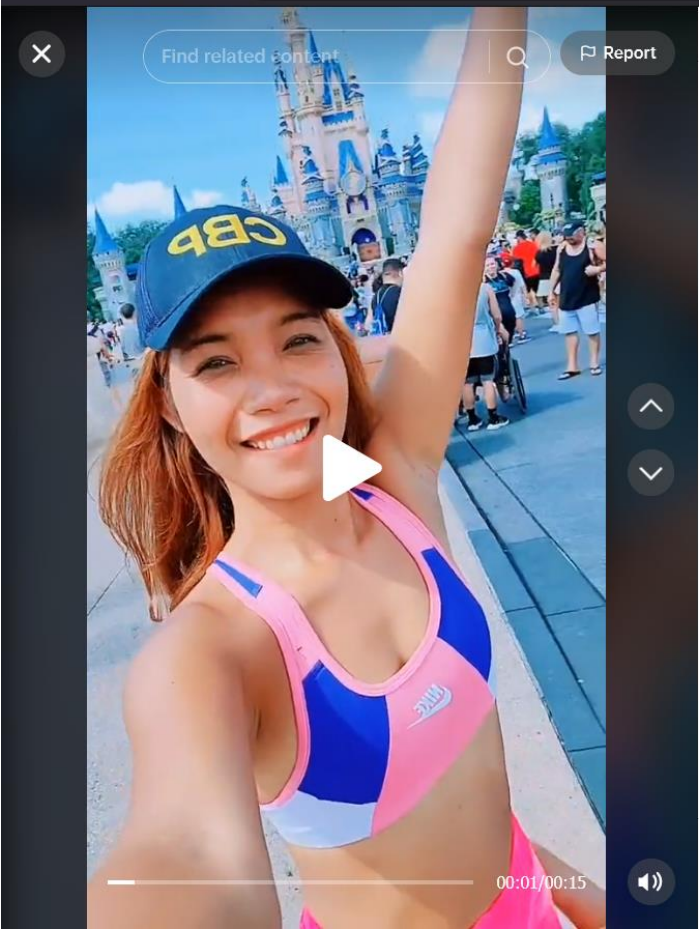
- L** Lee Beckman922  
Just beautiful  
2022-8-... Reply 1
- Phillip Cursley**  
hello beautiful x hows your day going? ❤️  
2022-9-7 Reply 0
- andrewgingras8**  
🤔  
2022-8-... Reply 1
- D** Dan  
i want to see more goodie  
2022-8-... Reply 0
- 1angrychef**  
You got my attention 🤔🔥🔥🔥🔥🔥  
2022-8-... Reply 1
- ralphredding1**  
sweet 🤔🤔🤔  
2022-8-... Reply 1
- Niedermann Hansjörg**  
yes lets try together 🤔🤔🤔🤔🤔🤔🤔  
2022-8-... Reply 1

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- Comments (24)** Creator videos
-  **look nice 🥰🥰** 2022-9-... Reply ❤️ 1
  -  **Mark King** Looks like you guys are having a great time my love. I miss you guys so much 2022-9-... Reply ❤️ 1
  -  **Charlie** Have a great time at Disney 2022-9-... Reply ❤️ 0
  -  **Marco DelaCruz** That's awesome I will be there for Thanksgiving in November Orlando Florida 🥰 2022-9-... Reply ❤️ 0
  -  **Wayne Rodgers4027** So happy 🥰👍 2022-9-... Reply ❤️ 0
  -  **Quinn Quello** GORGEOUS 2022-9-... Reply ❤️ 1
  -  **juddvans** o how we have missed you Heather.. 🥰 2022-9-... Reply ❤️
  -  **MeanCH 🇺🇸**
- Back to top
- Log in to comment



- Comments (39)** Creator videos
- 2022-9-... Reply
  - Mark King**  
Awe glad I could make that breathtaking smile appear. Love you guys.  
2022-9-... Reply
  - mk123**  
That's going to be an expensive day!!! 😂😂😂  
Have fun!!!  
2022-9-... Reply
  - Randy nadeau**  
Wow 😊  
2022-9-... Reply
  - Chris de Weyer**  
family fun day  
2022-9-... Reply
  - usermikeskehan**  
Love you  
2022-9-... Reply
  - Quinn Quello**  
beautiful  
2022-9-... Reply
  - Harrison Delmont Nel**  
wished I was down that way. Next year for sure
- [Back to top](#)
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**Comments (14)** Creator videos

2022-9-... Reply 0

**FALLENSUN** 📍  
👍👍👍  
2022-9-... Reply 1

**Mark King**  
I don't like to see my baby sad or crying. I hope I am the one that you need baby. Love you so much  
2022-9-... Reply 1

**MoanCH** 🇨🇭  
Good morning pretty lady 🥰🥰🥰  
2022-9-... Reply 0

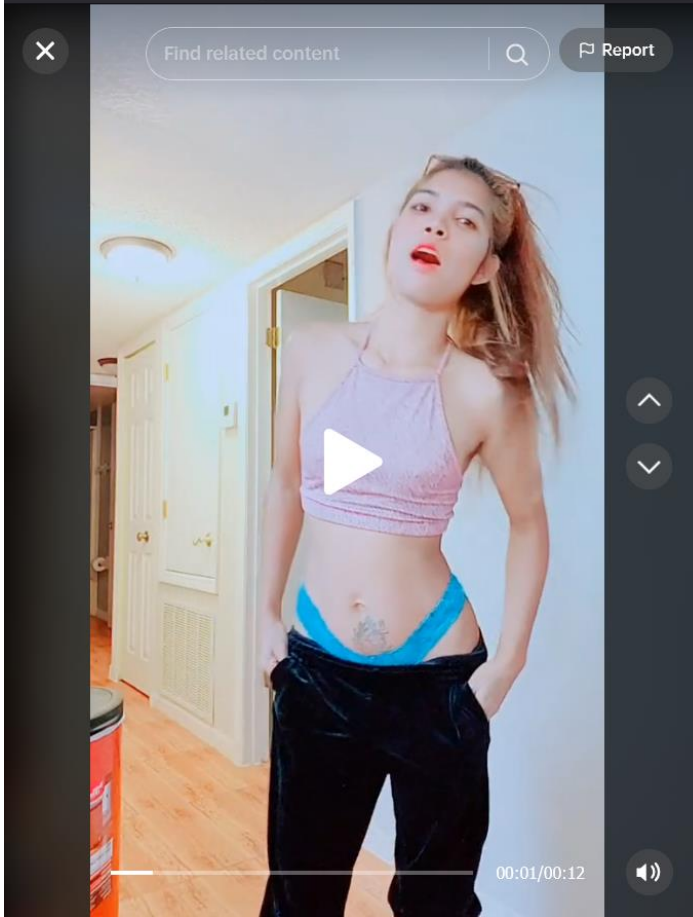
**Brian Loco**  
hey hun. everyone needs love. Keep your heart open  
2022-9-... Reply 1

**Quinn Quello**  
so beautiful  
2022-9-... Reply 1

**MrGrinch376**  
1st 🥰🥰🥰  
2022-9-... Reply 1

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**Comments (91)** Creator videos

-  🥰🥰🥰🥰🥰  
2022-9-... Reply 👍 1
-  **Freddy Van Haver** ❤️  
🥰🥰🥰🥰🥰  
2022-9-... Reply 👍 1
-  **Mark King**  
Wow really baby driving up my desire level. I love you so much baby  
2022-9-... Reply 👍 1  
View 1 reply ▾
-  **motorcitysnowman**  
You're a beautiful woman, no denying that. I just hope that you understand that you are so much more than that, too. 🙌🥰  
2022-9-... Reply 👍 1
-  **Shotime4545**  
I'm in love!!!  
2022-9-... Reply 👍 1  
View 1 reply ▾
-  **Kevin Skelton610**  
I won't argue that  
2022-9-... Reply 👍 1

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Comments (41)

Creator videos



Quinn Quello

so beautiful



3-18 Reply

1

View 1 reply



Mark King

Had a wonderful day with you my love. The puppies and babies love you so much



3-18 Reply

1

Mark King

Baby you make everyday brighter, you should have listened to the babies though my love



0

3-18 Reply



Nancy's 28 - Creator

👉👉👉👉



3-18 Reply

1

Mark King

Baby you and the babies are my whole world, my everything, my heart



1

3-18 Reply

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Chico

Hello beautiful 🥰 how are you??? I missed you so much lately 🥰



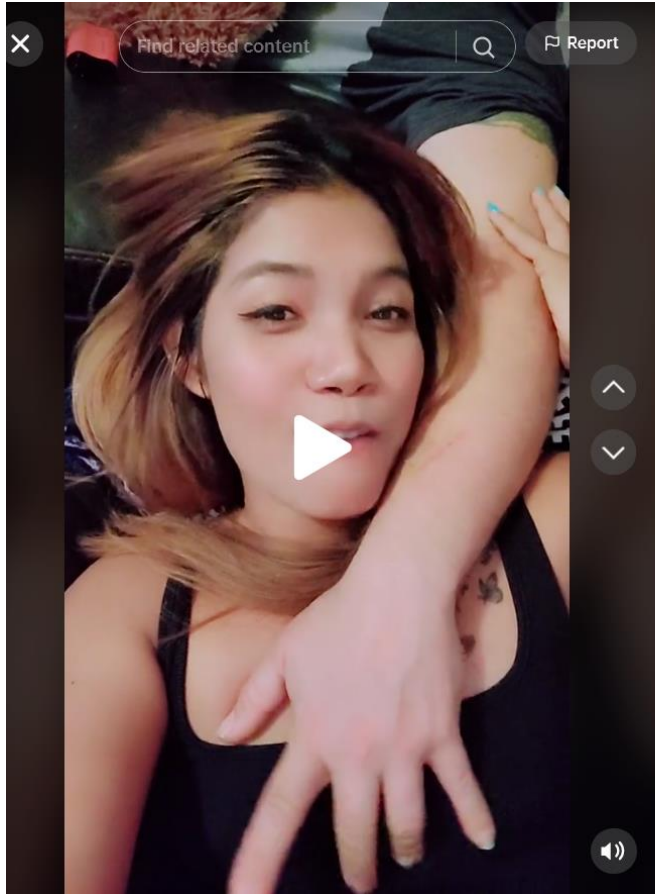
1

3-18 Reply

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Comments (20)

Creator videos


-  **Jake Crabbe**  
8-4 Reply  1
  -  **Romeo**  
Does he have Down syndrome? 🤔  
8-9 Reply  0  
View 1 reply ▾
  -  **reddoglewiston**  
Makes me happy to see so happy..... MARK... 🤔🤔  
7-31 Reply  0
  -  **Mark King**  
Baby with you by my side I am always smiling.  
You're such a goof and the love of my life.  
Always you first and everything  
7-30 Reply  1
  -  **Nancy's 28 · Creator**  
Haha I love you thank you for taking care of  
me and all the love that you always been  
give me and put a smile on face I love you  
baby 🤗🤗🤗  
7-30 Reply  0
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 **Mark King**  
Awe half of my loves  
6-21 Reply 1 ❤️


 **Nancy's 28 · Creator**  
👉👉👉👉  
6-21 Reply 1 ❤️  
Hide ^

 **Mark King**  
First baby you're my everything  
6-21 Reply 1 ❤️

 **Nancy's 28 · Creator**  
Love you baby 👉👉👉  
6-21 Reply 1 ❤️  
View 1 more ▾

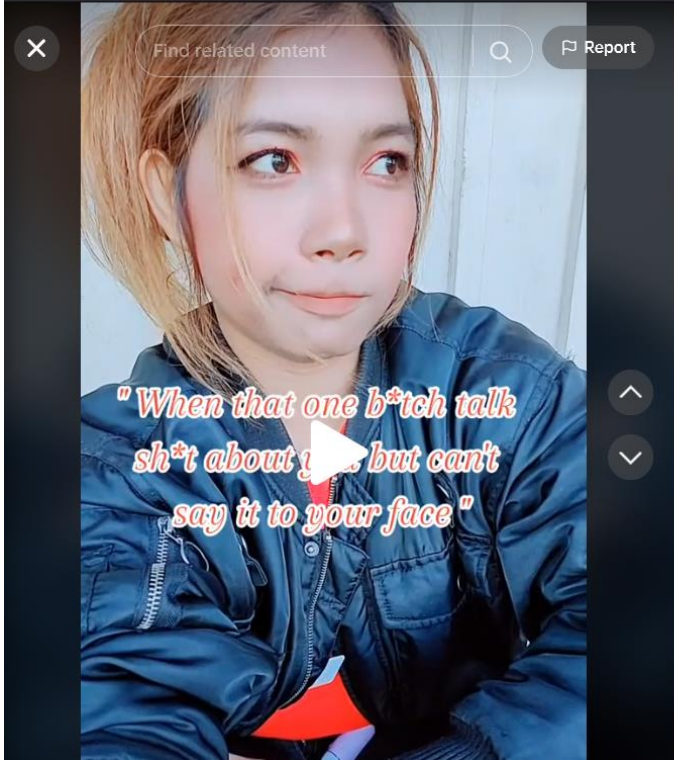
 **Analyn06**  
👉👉👉👉👉  
7-18 Reply 1 ❤️

 **Nancy's 28 · Creator**  
👉👉👉👉  
7-18 Reply 0 ❤️  
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 **JeromeXavere**  
👉👉👉👉👉  
6-22 Reply 0 ❤️  
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- Comments (28)** Creator videos
- no comments I'm dealing with it 🤔
- 7-7 Reply 1
- View 2 more ▾
- Mark King**  
Haha love you so much my gorgeous love. You're my everything 1st  
7-7 Reply 1
- Nancy's 28 · Creator**  
I love you so much baby 🥰🥰🥰  
7-7 Reply 1
- View 1 more ▾
- Ashley way**  
❤️❤️❤️  
8-3 Reply 0
- JeromeXavere**  
😄😄😄👑👑👑  
7-7 Reply 1
- FALLENSUN**  
😄😄😄🌊  
7-7 Reply 1
- mws4137**  
😄😄😄  
7-7 Reply 1
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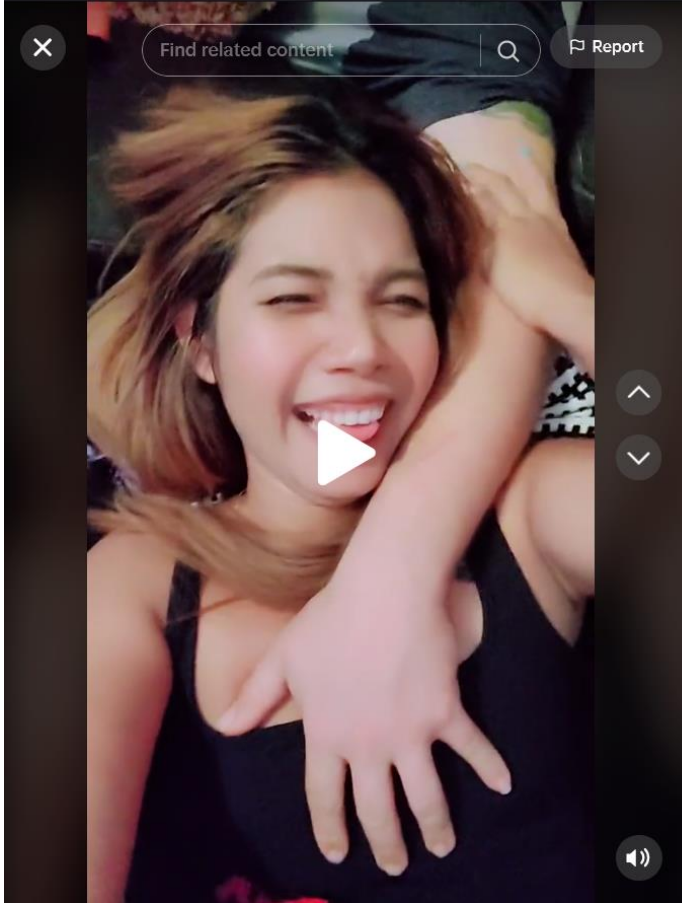



*On this day*  
6/21/2022



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Nancy's 28 · 7-30 Follow


Good morning have a wonderful Sunday don't forget to smile  
🥰🥰🥰 #foryoupage #mamabear #foryou #friendship  
#asiangirltiktok #welcometomyhosue #fyp #goodvibes  
#ilikethisway #happylife #thaigirl @Mark King @  
\_\_\_Analyn\_\_\_❤️ @❤️Babes\_tata\_Janie❤️ @  
POLY\_PRINCE🇹🇼 @

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🎵 original sound - yourmomsbabydaddy

❤️ 157 💬 20 📌 2 🔗 📧 📘 🌐 📧

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 **user2806868843185**  
Every time I see you ❤️  
1  
7-30 Reply

 **mikebeebe7**  
I hope never stop posting, I always look forward  
to seeing them. ❤️  
1  
7-30 Reply

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101 comments



markking41

I think Donny needs to be beaten.  
You're amazing gorgeous

1d Reply

Liked by creator



6



therealheatherdeep · **Creator**



1d Reply



0



bigpun010203

what the fuc\$ is that?

8h Reply



0



summervibes2245

