

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

Civil Action No. 3:22-CV-9

United States Courts
Southern District of Texas
FILED

JAN 19 2022

**JOE BLESSETT
PLAINTIFF
VS.**

Nathan Ochsner, Clerk of Court

GREGG ABBOTT

KEN PAXTON,

**TEXAS OFFICE OF ATTORNEY GENERAL CHILD SUPPORT ENFORCEMENT
DIVISION,**

STEVEN C MCCRAW,

TEXAS DEPARTMENT OF PUBLIC SAFETY

XAVIER BECERRA

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

ANTHONY BLINKIN

U.S. DEPARTMENT OF STATE

UNITED STATES

CITY OF GALVESTON

SINKIN LAW FIRM

DEFENDANTS

Amended Injunctive Relief, Estoppel of Title IV-D Administrative Enforcement Penalties

Cause of action equitable estoppel¹ of Title IV-D Administrative Enforcement penalties under 42 U.S. Code § 652, 42 U.S. Code § 654 (16), 42 U.S. Code § 654 (20),

¹ Equitable estoppel, sometimes known as estoppel in pais, protects one party from being harmed by another party's voluntary conduct. Voluntary conduct may be an action, silence, Acquiescence, or concealment of material facts. One example of equitable estoppel due to a party's acquiescence is found in Lambertini v. Lambertini, 655 So. 2d 142 (Fla. 3d Dist. Ct. App.

42 U.S. Code § 654 (21), 42 U.S. Code § 654 (27)(B)(ii), 42 U.S. Code § 654 (31), 42 U.S. Code § 664 and 42 U.S. Code § 666 for;

- (a) deceptive practices promoting a monopoly in Family Law support collection services,
- (b) omission of the pertinent information needed for informed consent for noncustodial parents,
- (c) due process violations,
- (d) lack of oversight in the application of Title IV-D enforcement and Title IV-D program abuses,
- (e) Separation of Powers and Supremacy Clause issues,
- (f) Lack of Commerce Clause protections for noncustodial parents,
- (g) Lack of Contract Clause protections for noncustodial parents,
- (h) Lack of 14th amendment equal protections and immunities,
- (i) Lack of 4th amendment protections against the executive branch weaponizing the judicial branch for an invalid adhesion contract to criminalize a debt and
- (j) absence of benefits for the noncustodial parent.

No sane person of maturity would submit to a Title IV-D financial obligation if made aware of their right to decline the federal program services.

Plaintiff requests permanent injunction stopping Title IV-D program enforcement penalties until the U.S. Congress can write legislation to correct the defects in the program, such as; (a) inadequate legal protections and benefits for the noncustodial parents in the application of the Title IV-D programs. (b) inadequate protection of U.S. Government interest for monies spent on state agency's Title IV-D administrative reimbursements. (c) specific legislation to address deceptive practices (d) specific

1995). In the late 1950s, Olga, who was married to another man, and Frank Lambertini met and began living together in Argentina. Olga and Frank hired an attorney in Buenos Aires, who purported to divorce Olga from her first husband and marry her to Frank pursuant to Mexican law. The Lambertinis began what they thought was a married life together, and soon produced two children. In 1968, they moved to the United States and became Florida residents.

legislation addressing the Separation of Powers for state and federal body's performance of the program and Supremacy Cause issues.

. Unless the defendant can prove U.S. Congress legislative exemption for contracted state agencies to violate the U.S. Constitution or an exemption to violate noncustodial parent's rights or show evidence of legal instruments of consent to a contractual Title IV-D financial obligation. U.S. Constitution prohibits exemptions to protection within the document, except for private contracts. There is no reason to deny injunctive relief and allow the continued infringement of rights.

Plaintiff requests the court grant an order for a permanent Estoppel of all Title IV-D Administrative Enforcement penalties under 42 U.S. Code § 652, 42 U.S. Code § 654 (16), 42 U.S. Code § 654 (20), 42 U.S. Code § 654 (21), 42 U.S. Code § 654 (27)(B)(ii), 42 U.S. Code § 654 (31), 42 U.S. Code § 664 and 42 U.S. Code § 666.

This injunctive relief request shall not interfere with receiving Title IV-D support order payments and distribution services.



Joe Blessett
Pro Se

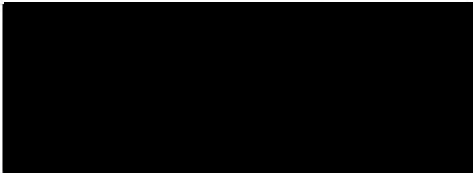
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Jun 18, 2022
Date

Certified Estoppel of Title IV-D Administrative Enforcement Penalties

I, Joe Blessett, have drafted, read, understood, and certify the attached forgoing Injunctive Relief, Estoppel of Title IV-D Administrative Enforcement Penalties filed herein as the truth. Each fact alleged therein is true and correct of my knowledge under penalty of perjury.

FURTHER, THE AFFIANT SAYIT NAUGHT



Joe Blessett

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

Luis J. Calo Morales

NOTARY PUBLIC

My commission expires: January 28th, 2024

