

2024CI09574

CAUSE NO. \_\_\_\_\_

IN THE DISTRICT COURT

JOHN W. BOCQUET,  
Plaintiff,

vs.

CHARLES GRAHAM COHEN,  
Defendant.

JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION FOR INJUNCTIVE RELIEF AND DAMAGES;  
AND JURY DEMAND

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES plaintiff JOHN W. BOCQUET, and files this Plaintiff's Original Petition  
for Injunctive Relief and Damages against Defendant CHARLES GRAHAM COHEN, and in  
support hereof respectfully shows this Court as follows:

I. PARTIES AND SERVICE

1. Plaintiff JOHN W. BOCQUET (hereinafter referred to as "John" or "Plaintiff") is an individual and resident of Bee County, Texas. Plaintiff can be served through his attorney of record Matthew J. Countryman of Lane & Countryman at 1045 Cheever Boulevard, Suite 103, San Antonio, Texas 78217.

2. Defendant CHARLES GRAHAM COHEN (hereinafter referred to as "Graham" or "Defendant") is an individual and resident of Texas who may be served with citation at 11220 Indian Trail, Helotes, Texas 78023, or wherever he may be found.

II. RULE 47 STATEMENT OF DAMAGES

3. As required by RULE 47(C), TEXAS RULES OF CIVIL PROCEDURE, Plaintiff's counsel states that Plaintiff seeks monetary relief of over one million dollars and non-monetary relief. The



amount of monetary relief actually awarded, however, will ultimately be determined by a jury. Plaintiff also seeks pre-judgment and post-judgment interest at the highest legal rate. The damages sought are within the jurisdictional limit of the Court.

4. Plaintiff seeks:

- A. Injunctive relief in the form of a Permanent Injunction;
- B. A Declaratory Judgment; *and*
- C. Monetary relief, including damages of every recoverable kind, multiple damages, penalties, expenses, pre-judgment interest, and attorney's fees.

### III. JURISDICTION AND VENUE

- 5. The subject matter and amount in controversy is within the jurisdictional limits of this Court.
- 6. This Court has jurisdiction over the parties, because Defendant is a Texas resident.
- 7. Venue in Bexar County is proper in this cause pursuant to SECTION 15.002(A)(2) OF THE TEXAS CIVIL PRACTICE AND REMEDY CODE, because this is the county of Defendant's residence at the time of the cause of the action.
- 8. Venue in Bexar County is proper in this cause pursuant to SECTION 15.002(A)(1) OF THE TEXAS CIVIL PRACTICE AND REMEDY CODE, because this is the county in which a substantial part of the events giving rise to the claim occurred.

### IV. FACTS

#### A. *Familial Relationship between Plaintiff and Defendant*

- 9. Plaintiff and Defendant are cousins. More specifically, Plaintiff's father and Defendant's maternal grandmother (both of whom are now deceased) were siblings.
- 10. Plaintiff's now-deceased father was named Robert August Bocquet (*hereinafter referred to as "Robert Bocquet", "Robert", or "Robert A. Bocquet"*).



11. Defendant's now-deceased maternal grandmother was named Blanche Eugenia Beechie (*hereinafter called "Blanche" or "Blanche Beechie"*).
12. Blanch and Robert had two other siblings: Philip Edmond Bocquet ("Philip") and Malcolm Oscar Bocquet ("Malcolm", and together with Philip, Robert and Blanche, *jointly hereinafter called the "Four Bocquet Siblings"*).

**B. Ownership of the Helotes Property**

13. On or about May 9, 1975, the Four Bocquet Siblings were deeded approximately 145 acres of real property in Helotes County "all in equal parts and shares, and all as a part of their respective property and estate." That General Warranty Deed is recorded in Volume 7583 Page 876, Deed Records of Bexar County, Texas, and a true and correct copy of that deed as found at <https://bexar.tx.publicsearch.us/> is attached hereto as **Exhibit A**.
14. Around the time that they were conveyed the approximately 145 acres of real property (*hereinafter called the "Henderson Conveyance"*), the Four Bocquet Siblings agreed, orally, that they would carve out four 2-acre parcels of equal value from the Henderson Conveyance, one of which would be granted to each of the Four Bocquet Siblings by the others for each of the Four Bocquet Siblings to have a selected home site.
15. Consistent with and in partial performance of that agreement, on or about April 19, 1976, Robert, Philip and Malcolm and their respective spouses granted, sold and conveyed each of their respective undivided three-fourths interests in a 2-acre parcel of the Henderson Conveyance to their sister, Blanche (*hereinafter called the "Beechie Parcel"*) in a document recorded in Volume 7831 Page 156, Deed Records of Bexar County, Texas.
16. Thus, Blanche Beechie became the 100% owner of the 2-acre Beechie Parcel.



17. Following the conveyance of the 2-acre Beechie Parcel, ownership of the remaining 143 acres of the Henderson Conveyance (*hereinafter called the "Helotes Property,"* which surrounds the 2-acre Beechie Parcel) was retained in equal parts and shares by Robert, Philip, Malcolm and Blanche.
18. The Helotes Property was never subsequently divided to convey the 2-acre parcels each to Robert, Philip and Malcolm as had been agreed orally by the Four Bocquet Siblings. *LOL*
19. Both the Helotes Property and the Beechie Parcel are known as 11220 Indian Trail, Helotes, Texas 78023.
20. On or about October 6, 2017, following Blanche Beechie's death, the Beechie Parcel was conveyed to Defendant's mother, Carla Beechie. To the best of Plaintiff's knowledge, Carla Beechie is still the owner of the 2-acre Beechie Parcel, on which there is a residential structure.
21. On information and belief, Defendant Graham lives in the residential structure that is on the Beechie Parcel.
22. According to public records, the Four Bocquet Siblings' interests in the Helotes Property have most recently been conveyed as follows:
- a. On or about August 18, 1993, Philip's  $\frac{1}{4}$  interest in the Helotes Property was conveyed to Lisa Bocquet Hope.
  - b. On or about December 3, 2007, Robert's  $\frac{1}{4}$  interest in the Helotes Property was conveyed to Robert A. Bocquet and Myrtle R. Bocquet, Trustees, or successors in Trust under the Bocquet Living Trust, dated December 3, 2007 (the "Bocquet Living Trust"). A true and correct copy of that deed as found at <https://bexar.tx.publicsearch.us/> is attached hereto as Exhibit B.
- John W. Bocquet vs. Charles Graham Cohen*  
*11220 Indian Trail*  
*Helotes, TX*



- c. In or around January and February 2014, Malcolm's 1/4 interest in the Helotes Property was conveyed to five heirs, who then conveyed each of their interests to The Bocquet Family Limited Partnership (which was formed in or around December 2013 by John E. Johnson and Jackie Johnston as its general partners).
  - d. On or about December 1, 2017, Blanche Beechie's 1/4 interest in the Helotes Property was conveyed to three persons in equal undivided shares: (1) Carla Beechie (Defendant's mother); (2) Roger Allen Beechie; and (3) Ida Claire Beechie.
23. Accordingly, the Trustees of the Bocquet Living Trust are the owners of a one-quarter undivided interest in the Helotes Property.
24. Plaintiff John Bocquet and his mother, Myrtle R. Bocquet ("Myrtle" or "Myrtle Bocquet"), are co-trustees of the Bocquet Living Trust. A true and correct copy of the document appointing Plaintiff John Bocquet as co-trustee of the Bocquet Living Trust is attached hereto as Exhibit C.
25. On information and belief, Defendant Graham possesses no legal title or ownership interest in the Helotes Property.

***C. History of Dispute in the Bocquet/Beechie Family***

26. Myrtle and Robert Bocquet had two children: Plaintiff John Bocquet and Plaintiff's sister, Laura Bocquet.
27. In or around 2005, Laura Bocquet had agreed to the terms of a final judgment and settlement in a lawsuit in which Laura Bocquet, Plaintiff John Bocquet, and their parents (Robert and Myrtle Bocquet) were parties which forever barred Laura Bocquet from claiming or asserting any right, title, interest or ownership in Robert and Myrtle Bocquet's property, including any real estate interests.



28. Additionally, Plaintiff has seen estate planning documents executed by his parents in or around 2007 in which Laura Bocquet was explicitly disinherited by Robert and Myrtle Bocquet.
29. On information and belief, Defendant and his branch of the extended family disliked that Laura Bocquet was disinherited and that Plaintiff John stood to inherit his parents' interest in the Helotes Property.
30. By way of example, in or around September 2014, Defendant's aunt, Claire Bruno (a/k/a Ida Claire Beechie), sent a letter and an email restating that letter (*jointly*, the "Bruno Letters") to Robert and Myrtle Bocquet attempting to convince them to leave their quarter interest in the Helotes Property to Laura Bocquet, despite the fact that Laura Bocquet had been disinherited. A true and correct copy of the Bruno Letters, as received by Plaintiff from his mother, are attached hereto as **Exhibit D**. They state as follows:

Dear Uncle Bob and Aunt Myrt,

I have been heavy hearted for some time now and finally felt brave enough to visit with you both about this in Corpus, but you didn't come.

The Bocquet/Henderson Helotes Property has begun passing generations. With Phil's passing, Lisa inherits his share. Our family is very close to Lisa, we comfortably manage property issues. From Uncle Malcolm to Florence, then the property passed to Florence's children. Again, our family has an amicable relationship with them.

Graham out of all Blanche's grandchildren claims the most kinship with the land (although they all are heirs), and then there's your family.

I am writing to let you know just how deeply connected our family has gotten to Laura and her children – especially the girls. Mother and Daddy just adore them, Graham feels very close. Carla, of course, is also very invested in their lives.

As I watch this bond grow, my desire to see Laura and her children as stewards to this beautiful Bocquet/Henderson family project grows by the moment. I can



see fruitful partnerships between all these family members develop for the good of the "Ranchito."

I am writing to beg you to consider leaving the Helotes property to Laura and her children, it would be a beautiful investment in your family, Uncle Bob, Aunt Ida would be very pleased!

We don't feel any ill will towards John, we simply don't feel any connection. Laura, on the other hand, has become a very dear family member.

Please know that this request comes with deep respect and love for you both.

Take the sweetest care.

Claire (Ida Claire)

31. The Bruno Letters specifically reference Defendant, stating that Defendant "Graham . . . claims the most kinship with the land," and that Defendant "Graham feels very close" to Laura Bocquet.
32. On information and belief, Robert and Myrtle Bocquet were not persuaded to change their estate planning or their disinheritance of Laura Bocquet as a result of the Bruno Letters.

***D. The March 14, 2022, Incident at the Helotes Property***

33. The Helotes Property has a 1-d-1 agricultural wildlife exemption.
34. To maintain a wildlife tax exemption, landowners must conduct certain wildlife management practices.
35. On or about March 14, 2022, Plaintiff was at the Helotes Property with two people—Kolten Motes and Jordan North—engaging in re-clearing a previously existing throughway and repairing fences, and clearing some of the land for wildlife, consistent with maintaining the Helotes' Property's agricultural wildlife exemption. mul. p. 25  
- H<sub>2</sub>O (mud)  
- v. h. w. "has history"
36. Kolten Motes and Plaintiff John co-own Rocking M Contractors, LLC ("Rocking M"), a Texas company specializing in excavation and site development.



37. While Plaintiff was at the Helotes Property, Defendant showed up riding a utility terrain vehicle (UTV) and started harassing Plaintiff.
38. While Plaintiff was attempting to leave in his truck, Defendant rushed up to Plaintiff's truck (which was moving at approximately a few miles per hour) in his UTV, jumped onto the left hood of Plaintiff's truck while making a video recording, then slammed the driver side window of Plaintiff's truck with his fist. - wow!
39. Defendant then called 911, and the Sheriff showed up at the Helotes Property with an ambulance.
40. Defendant falsely told the Sheriff that the Plaintiff had run over him and that he wanted to press charges against Plaintiff.
41. However, Defendant admitted to the Sheriff that he was attempting to detain and prevent Plaintiff from leaving the Helotes Property.
42. On or about May 12, 2022, Defendant sent Plaintiff Signal messages saying the following: "Is it true that you're not really family," and "Your mother cheated on your father and your are a bastard child?" A true and correct copy of that message is attached hereto as Exhibit E.
43. Sometime after receiving that May 12, 2022, message from Defendant, Plaintiff discovered for the first time that Defendant had created a website using Plaintiff's name, johnbocquet.com (*hereinafter referred to as the "Website"*), without Plaintiff's permission, on which Defendant had published numerous false and defamatory statements, including that Plaintiff is not the true son of his father, Robert Bocquet.
44. The Website contains several links to YouTube videos posted by the user "Graham Cohen," including videos that appear to have been taken of Plaintiff at the Helotes Property on or



about March 14, 2022. Thus, it is apparent that the Website was published or caused to be published by Defendant Graham.

45. As of May 31, 2022, the Website (which also contained pictures, including pictures of Plaintiff) stated the following:

**PUBLIC INFORMATION SOURCE**

Wiki Contribution Hub

John William Bocquet: The True Son of Dudley T. Dougherty, Beeville, TX:

DOB: [Redacted]

This is information (wiki) accumulation and beginnings of a knowledgebase, constructed for public consumption, and contribution with regard to John Bocquet (Dougherty) with additional regard to RDO Equipment employees, and devastation of property at 11220 Indian Trail Helotes, TX for personal gain.

Information to date, and court evidence submitted in previous trials, indicates that the benefit from business and association with John Bocquet (Dougherty), is exclusively for John Bocquet (Dougherty).

Birthright: John Bocquet (Dougherty)'s DNA will indicate he is the son of a Dudley T. Dougherty of Beeville, TX and is not true family of Bocquet & Beechie.

The reason John Bocquet (Dougherty) sought to destroy property he does not own is a mystery, and refuses to correspond over the phone, text or encrypted Signal transmission.

RDO Equipment employees, on John Bocquet (Dougherty)'s permission, bulldozed across 144 acres in absolute trespass, and fired high-powered rifles into the neighboring state park and towards homes in Helotes Ranch Acres neighborhood.

John Bocquet (Dougherty) gave authorization to bulldoze land he does not own.

On discovery of said destruction, John Bocquet (Dougherty) immediately fled the scene, struck C. Graham Cohen with his vehicle, and abandoned the RDO equipment operators (and perhaps acquaintances).

Old and timeless Oak trees cannot be replaced or uprighted again. The ground is soured and is vulnerable and fully exposed to the Oak Wilt infestation, as evidenced on the neighboring properties.



(11) land owners have a (60) foot swath through an (144) acre plat with four (proposed) plots.

It should be noted that all stakeholders, maintain undivided interest over the entire (144) acres and John Bocquet (Dougherty) is not a stakeholder, landowner, or a family member

These videos exemplify a small part of the larger devastation along the bordering fence with a State Park and across (11) landowners' legacies.

(opinion-only) All that John Bocquet (Dougherty) has destroyed was once a beautiful place, and it is truly unfortunate there is not a machine in existence that can un-bulldoze said destruction.

John Bocquet (Dougherty) - Personal Gain at the Disadvantage of Others

John Bocquet (Dougherty) does share the name of a single, deceased member of the family, but the land is in trust and belongs to his mommy.

John Bocquet (Dougherty) is person that makes his way through life through litigation: against his only sibling (sister), his former employers, and his aunt.

John Bocquet (Dougherty) gun-whipped his father, had Robert Bocquet jailed to expedite inheritance and acquisition of land, farming equipment, and life-long accomplishments.

(opinion-only) John Bocquet (Dougherty) is perceived as a freeloader and fodder without use by his family.

(opinion-only) As exemplified with decisions in the following videos, John Bocquet (Dougherty) maintains the perception of an obsequious, parasitic wealth-seeking leech.

(Opinion-only) The fecal matter seen in his teeth during previous encounters exemplifies strong indication of the foulness this person exudes.

Destruction of Family Land & RDO Equipment Employees Firing Guns into a State Park

Have a wiki contribution to JohnBocquet.com? If John Bocquet (Dougherty) has wronged you, stolen from, or burdened you with his own incapacities. Please contact [johnbocquet@idtrackthat.com](mailto:johnbocquet@idtrackthat.com)



Robert Bocquet (Deceased): This picture was taken before being gun-whipped and attempting to protect himself from the abuse from the hands of John Bocquet (Dougherty).

46. Defendant made or caused to be made a new publication on the Website soon thereafter (either in late May 2022 or early June 2022), with additional false and defamatory information, now identifying Plaintiff's company, Rockin' M. A true and correct copy of a printout of the Website on June 8, 2022, is attached hereto as **Exhibit F** hereto. As of that date, the Website stated the following:

**PUBLIC INFORMATION SOURCE**

Wiki Contribution Hub

John William Bocquet: The True Son of Dudley T. Dougherty, Beeville, TX:

DOB: [Redacted]

This is information (wiki) accumulation and beginnings of a knowledgebase, constructed for public consumption, and contribution with regard to John Bocquet (Doughty) with additional regard to Rockin' M employee , and devastation of property at 11220 Indian Trail Helotes, TX for personal gain.

Information to date, and court evidence submitted in previous trials, indicates that the benefit from business and association with John Bocquet (Dougherty), is exclusively for John Bocquet (Dougherty).

The reason John Bocquet (Dougherty) sought to destroy property he does not own is a mystery, and refuses to correspond over the phone, text or encrypted Signal transmission - "blocked" as he said during previous conversation.

Rockin' M business owner Kolten Motes, on John Bocquet (Dougherty)'s permission, bulldozed across 144 acres in absolute trespass.

With wife, Taylor Baliff, high-powered rifles were fired into the neighboring state park and towards homes in Helotes Ranch Acres neighborhood. There is no safety in place. This put state park attendees and direct neighbors in great peril. When told they were trespassing and shooting on private property, great inconvenience was expressed and that it "created a predicament." (see video below)

As an act of revenge, John Bocquet (Dougherty) gave false authorization to Rockin' M business owner Kolten Motes to devastate the land. This was without regard for the its Specific Use, the generations of family use, and property rights



of the owners. John Bocquet (Dougherty) purposely diminished the value of the property.

On discovery of said destruction in progress, John Bocquet (Dougherty) and Kolten Motes immediately attempted to flee the scene. John Bocquet (Dougherty) struck C. Graham Cohen with his vehicle, and abandoned Kolten Motes.

Along the entire fence line shared with Government Canyon State Park, the destruction of old and timeless Oak trees, rock formations, and beautiful views cannot be undone. The ground is not only soured, it is now fully exposed and vulnerable to the Oak Wilt infestation, as evidenced on the neighboring properties.

(11) land owners have a (60) foot swath through an (144) acre plat with four (proposed) plots.

It should be noted that all stakeholders, maintain undivided interest over the entire (144) acres and John Bocquet (Dougherty) is not a stakeholder, landowner, or a family member.

These videos exemplify a small part of the larger devastation along the bordering fence with a State Park and across (11) landowners' legacies.

(Opinion) All that John Bocquet (Dougherty) has destroyed was once a beautiful place, experienced and maintained by four generations of family. It is truly unfortunate there is not a machine in existence that can un-bulldoze said destruction. He is a small man.

John Bocquet (Dougherty), Bastard Son & Result of an Extra-Marital Affair

Birthright: John Bocquet (Dougherty)'s DNA will indicate he is the son of a Dudley T. Dougherty of Beeville, TX and is not true family of Bocquet & Beechie - in name only.

The extra-marital affair and activity between Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty was disclosed during a meeting at Beeville Country Club.

Myrtle McKinney Rosebrock (grandmother), was in attendance with Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty. The option of divorce from Robert Bocquet was strongly forbidden.

Two siblings, Johnye Jamison and Jane Pugh Jamison, not in attendance at the meeting and informed of the extra-marital affair, counseled Myrtle Nell



Rosebrock Bocquet on the importance of staying married to Robert Bocquet for the sake of the child, and to honor the Catholic church doctrine.

There was no love between Myrtle Nell Rosebrock Bocquet and Robert Bocquet. In fact, Myrtle Nell Rosebrock Bocquet did not share a bedroom with her husband. She instead slept upstairs in her bastard son's room.

John Bocquet (Dougherty) does share the name of a single, deceased member of the family, but the land is in trust and belongs to his mommy.

John Bocquet (Dougherty) - Personal Gain at the Disadvantage of Others

John Bocquet (Dougherty) is person that makes his way through life through litigation: against his only sibling (sister), his former employers, and his aunt.

John Bocquet (Dougherty) gun-whipped his father and had Robert Bocquet jailed to expedite his potential inheritance, and acquisition of land, farming equipment, and his father's life-long accomplishments and wealth.

Johnye Jamison and Jane Pugh Jamison accepted a call from Myrtle Nell Rosebrock Bocquet admitting to and confirming the current and past (all) abuse against Robert Bocquet from her and her son.

Before the death of Myrtle McKinney Rosebrock (grandmother), John Bocquet (Dougherty) conned her for \$30,000.

His mother, Myrtle Nell Rosebrock Bocquet, protected him, concealed the theft, and earned a lesser inheritance than both sisters, as a result.

John Bocquet (Dougherty) filed suit against his sister, (John Bocquet vs Laura Bocquet). Laura Bocquet's children were also named in the suit. He sought full control of their goats.

*[Pending investigation of fact]* John Bocquet (Dougherty) was employed with a [motorhome rental company], and was sued by his employer for theft.

Such behavior, and lack of integrity, exemplifies the character of John Bocquet (Dougherty), and further prevented any sort of trust from Robert Bocquet and financial matters.

Robert Bocquet, father of John Bocquet (Dougherty) in name only, put Carla Beechie as executor of his granddaughters' college funds Complete control of the funds by a family member outside of the immediate household was necessary, due to the greed and extreme desire for his estate and wealth.



Mother and son filed suit against Carla Beechie for control of said assets. Represented by Bethune | Enright, Bar Card Number: 24082964, 117 N Washington St. Beeville, TX 78102-4508, the case was entirely squandered in favor of the Bocquets. Jonathan Enright has yet to respond to email inquiries sent May 11th & 16th, 2022.

(Opinion) Beeville is a small town with great influence by certain parties on legal matters. Whether this firm chose to willingly act outside of the highest degree of loyalty and honesty in their fiduciary duty to Carla Beechie, remains to be determined.

(Opinion) John Bocquet (Dougherty) is perceived as a freeloader and fodder without use by his family.

(Opinion) As exemplified with decisions in the following videos, John Bocquet (Dougherty) maintains the perception of an obsequious, parasitic wealth-seeking leech.

(Opinion) Destruction of State Park and ranchland without reason, enjoyed by generations of owners, exemplifies strong indication of the foulness this person exudes.

Destruction of Family Land & Rockin' M Operators Firing Guns into a State Park

Have a wiki contribution to JohnBocquet.com? If John Bocquet (Dougherty) has wronged you, stolen from, or burdened you with his own incapacities. Please contact [johnbocquet@idtrackthat.com](mailto:johnbocquet@idtrackthat.com)

Robert Bocquet (Deceased): This picture was taken before being gun-whipped and attempting to protect himself from the abuse from the hands of John Bocquet (Dougherty).

47. On or about May 25, 2023, through his counsel, Plaintiff discovered yet a new defamatory posting published on johnbocquet.com (a true and correct copy of which is attached hereto as **Exhibit G**, stating the following:

PUBLIC INFORMATION SOURCE

Wiki Contribution Hub

John William Bocquet: The True Son of Dudley T. Dougherty, Beeville, TX:

DOB: [redacted]



This is a publicly-sourced, web-based collaborative platform that enables users to store and modify content in an organized manner with regard to John Bocquet (Dougherty). There is additional regard to Rockin' M employee Kolten Motes, and devastation of property at 11220 Indian Trail Helotes, TX for absolute personal gain.

Information represented here to date, from participants, county and district courts in the U.S. (and pending satisfaction of multiple remaining open records requests), illustrate the strong distinction that Mr. Bocquet's "business", as he referred to his practice, is morally ambiguous, and those that participate are subject to great financial loss.

The reason John Bocquet (Dougherty) sought to destroy multiple real property he does not have interest in stems from the actions of his father, Dudley T. Dougherty. He comes from a line of family that prey on rural populations in times of hardship. The acts are entirely intentional, especially with distinct, prior knowledge of said hardship or immanent financial default. The actions and services, whether desired or not, were rendered - even forced - and recipients are penalized for failing to see through the scheming until it is too late.

Mr. Bocquet refuses to contribute to this wiki, correspond over the phone, text or even encrypted Signal transmission - and is often "blocked" as mentioned in previous conversation.

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Rockin' M business owner Kolten Motes, managed by John Bocquet (Dougherty), bulldozed across 144 acres in absolute trespass along Texas State Park property. The once wooded forests were sanctuary to wildlife. Officials in the neighboring state park are very much willing to assist to make recompense to the rightful inhabitants for loss and injury.

Along the entire fence line shared with Government Canyon State Park, the destruction of old and timeless Oak trees, rock formations, and beautiful views cannot be undone. The ground is not only soured, it is now fully exposed and vulnerable to the Oak Wilt infestation, as evidenced on the neighboring properties.

Kolten Motes, with wife, Taylor Baliff, were discovered firing high-powered rifles into the state park, towards its visitors and also the homes in Helotes Ranch Acres neighborhood. This put state park attendees and direct neighbors in danger. When informed of trespass on private property, there was mention that said notification "created a predicament." (see video below)

*Ark Supp  
1/12/16*



As an act of revenge, John Bocquet (Dougherty) gave authorization to Rockin' M business owner Kolten Motes to devastate the land. This was without regard for the its Specific Use, the generations of family's use, and property rights of the owners. John Bocquet (Dougherty) purposely diminished the value of the property as an act of revenge and to devalue the land for his own purpose.

On discovery of said destruction in progress, John Bocquet (Dougherty) and Kolten Motes immediately attempted to flee the scene. John Bocquet (Dougherty) struck another man in the video with his vehicle and then abandoned Kolten Motes entirely, in attempts to fee from the sheriff. Kolten Motes, too obese to flee in a timely manner, was on site when the Bexar County sheriff arrived. Mr. Bocquet returned later in the evening.

The land owners, where forest was, now have a (60') wide grated swath of destruction through an (144) acre plat with four (proposed) plots along the fence shared with the state park.

It should be noted that all stakeholders, maintain undivided interest over the entire (144) acres and John Bocquet (Dougherty) is not a stakeholder, landowner, or a family member.

These videos exemplify a small part of the larger devastation along the bordering fence with a State Park and across (11) landowners' legacies.

(Opinion) All that John Bocquet (Dougherty) has destroyed was once a beautiful place, experienced and maintained by four generations of family. It is truly unfortunate there is not a machine in existence that can un-bulldoze said destruction. Perhaps he thought he would rent the wildlife sanctuary to hunters? Perhaps he thought he would make money by destroying and devaluing land? It is truly a mystery what dunderheaded ignorance was driving these acts.

what?  
not truth?

John Bocquet (Dougherty), Bastard Son & Excrement of Extra-Marital Affair

Birthright: John Bocquet (Dougherty)'s DNA will indicate he is the son of a Dudley T. Dougherty of Beeville, TX and is not true family of Bocquet & Beechie - in name only.

The extra-marital affair and activity between Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty was disclosed during a meeting at Beeville Country Club.

Myrtle McKinney Rosebrock (grandmother), was in attendance with Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty. The option of divorce from Robert Bocquet was strongly forbidden.



Two siblings, Johnye Jamison and Jane Pugh Jamison, not in attendance at the meeting and informed of the extra-marital affair, counseled Myrtle Nell Rosebrock Bocquet on the importance of staying married to Robert Bocquet for the sake of the child, and to honor the Catholic church doctrine.

There was no love between Myrtle Nell Rosebrock Bocquet and Robert Bocquet. In fact, Myrtle Nell Rosebrock Bocquet did not share a bedroom with her husband. She instead slept upstairs in her bastard son's room.

John Bocquet (Dougherty) does share the name of a single, deceased member of the family, but the land is in trust and belongs to his mommy.

John Bocquet (Dougherty), Personal Gain & Financial Consequence to Others

John Bocquet (Dougherty) is person that makes his way through life through litigation: against his only sibling (sister), his former employers, and his aunt.

1. John Bocquet (Dougherty) gun-whipped his father and had Robert Bocquet jailed to expedite his potential inheritance, and acquisition of land, farming equipment, and his father's life-long accomplishments and wealth.
2. Johnye Rosebrock Jamison and Jane Rose Brock Pugh accepted a call from Myrtle Nell Rosebrock Bocquet admitting to and confirming the current and past (all) abuse against Robert Bocquet from her and her son. Before the death of Myrtle McKinney Rosebrock (grandmother), John Bocquet (Dougherty) conned her for \$30,000. His mother, Myrtle Nell Rosebrock Bocquet, protected him, concealed the theft, and earned a lesser inheritance than her seven other siblings, as a result.
3. John Bocquet (Dougherty) filed suit against his sister, (John Bocquet vs Laura Bocquet). Laura Bocquet's children were also named in the suit. He sought full control of their goats.
4. John Bocquet (Dougherty) was employed with a [motorhome rental company], and was sued by his employer for theft.
5. John Bocquet (Dougherty) conned and collected money from those that trusted him, along with family members - many thousands of dollars. When the RV company hoax was uncovered, he swindled the same persons again for the legal authority to fight on their behalf, resulting in an even greater financial scheme to defraud.
6. John Bocquet (Dougherty) verbally and physically abused his ex-wife and step daughter [disturbing detail omitted]



7. John Bocquet (Dougherty) fired a high-powered rifle on children exploring a neighboring property he had recently acquired through financial default and auction. (The previous owners were unable hold on to the property in times of hardship with the county. John took it upon himself to ensure the county was notified in a timely manner and did all in his power to win at auction) Police were later called to his residence after he was reported to have fired multiple rounds towards children on the property. (pending receipt of open records)

8. [Anonymous Submission] John Bocquet (Dougherty) - Riverfront property, inherited through deceased family member, was split into sections. [Anonymous] was hired to bulldoze and clear along property lines for the purpose of local leasing to hunters. [Anonymous] performed the action, while John Bocquet was out of country. The bulldozing of property was not agreed upon between landowners (family members) prior to leaving the country. Claims for the work performed went ignored, and were met shortly after with threats of litigation from John Bocquet (Dougherty). [Anonymous] almost went bankrupt from the amount of clearing performed, resources used in the process, and duration of work.

9. Robert Bocquet, illegitimate father of John Bocquet (Dougherty) - (name only) - placed his niece as executor of his granddaughters' college funds. Complete control of the funds by a family member outside of the immediate household was necessary, due to the greed and extreme desire for his estate and wealth. John's mother and son filed suit against "niece" for control of said assets. Represented by Bethune | Enright, Bar Card Number: 24082964, 117 N Washington St. Beeville, TX 78102-4508, the case was entirely squandered in favor of the Bocquets. Jonathan Enright has yet to respond to email inquiries sent May 11th & 16th, 2022.

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Such behavior, and lack of integrity, exemplifies the character of John Bocquet (Dougherty), and further prevented any sort of trust from Robert Bocquet and financial matters.

(Opinion) Beeville is a small town with great influence by certain parties on legal matters. Whether this firm chose to willingly act outside of the highest degree of loyalty and honesty in their fiduciary duty parties outside of the Bocquet family remains to be determined.

(Opinion) John Bocquet (Dougherty) is perceived as a freeloader and fodder without use by his family.



(Opinion) As exemplified with decisions in the following videos, John Bocquet (Dougherty) maintains the perception of an obsequious, parasitic wealth-seeking leech.

Destruction of Family Land & Rockin' M Operators Firing Guns into a State Park

Have a wiki contribution to JohnBocquet.com? If John Bocquet (Dougherty) has wronged you, stolen from, or burdened you with his own incapacities. Please contact [johnbocquet@idtrackthat.com](mailto:johnbocquet@idtrackthat.com)

Robert Bocquet (Deceased): This picture was taken before being gun-whipped and attempting to protect himself from the abuse from the hands of John Bocquet (Dougherty).

48. Multiple of the above statements are false, including, but not limited to:

(a) Statements falsely alleging that Plaintiff engaged in the destruction of the Helotes Property, including without limitation statements that:

- i. Plaintiff "sought to destroy multiple real property he does not have interest in"; —
- ii. Plaintiff engaged in "devastation of property at 11220 Indian Trail Helotes, TX for absolute personal gain"; — *hunting, prior payments*
- iii. "Rockin' M business owner Kolten Motes, managed by John Bocquet (Dougherty), bulldozed across 144 acres in absolute trespass along Texas State Park property";
- iv. The "rightful inhabitants" have suffered "loss and injury";
- v. "As an act of revenge, John Bocquet (Dougherty) gave authorization to Rockin' M business owner Kolten Motes to devastate the land. This was without regard for the its Specific Use, the generations of family use, and property rights of the owners.";



- vi. "John Bocquet (Dougherty) purposely diminished the value of the property as an act of revenge and to devalue the land for his own purpose";
  - vii. "The land owners, where forest was, now have a (60') wide graded swath of destruction through an (144) acre plat with four (proposed) plots along the fence shared with the state park.";
  - viii. There was a "discovery of said destruction in progress";
  - ix. "... the destruction of old and timeless Oak trees, rock formations, and beautiful views cannot be undone. The ground is not only soured, it is now fully exposed and vulnerable to Oak Wilt infestation . . .";
  - x. There is "devastation along the bordering fence with a State Park and across (11) landowners' legacies.";
  - xi. "(Opinion) All that John Bocquet (Dougherty) has destroyed was once a beautiful place, experienced and maintained by four generations of family. It is truly unfortunate there is not a machine in existence that can un-bulldoze said destruction. Perhaps he thought he would rent the wildlife sanctuary to hunters? Perhaps he thought he would make money by destroying and devaluing land? It is truly a mystery what dunderheaded ignorance was driving these acts"; and
  - xii. There was "Destruction of Family Land";
- (b) Statements falsely accusing Plaintiff of engaging in unpermitted clearing of property (e.g., "John Bocquet (Dougherty) - Riverfront property, inherited through deceased family member, was split into sections. [Anonymous] was hired to bulldoze and clear along property lines for the purpose of local leasing to hunters. [Anonymous] performed the action, while John Bocquet was out of country. The bulldozing of

How would I  
have the  
w/o money



property was not agreed upon between landowners (family members) prior to leaving the country. Claims for the work performed went ignored, and were met shortly after with threats of litigation from John Bocquet (Dougherty). [Anonymous] almost went bankrupt from the amount of clearing performed, resources used in the process, and duration of work.”);

- (c) Statements falsely accusing Plaintiff of striking Defendant with a vehicle while at the Helotes Property (e.g., “John Bocquet (Dougherty) and Kolten Motes immediately attempted to flee the scene. John Bocquet (Dougherty) struck another man in the video with his vehicle and then abandoned Kolten Motes entirely, in attempts to flee from the sheriff. Kolten Motes, too obese to flee in a timely manner, was on site when the Bexar County sheriff arrived. Mr. Bocquet returned later in the evening.”);
- (d) Statements falsely alleging that Plaintiff John is not the true son of Robert Bocquet, but was actually the product of an affair between Plaintiff’s mother, Myrtle Bocquet, and another man, including without limitation the following statements:
  - i. “John William Bocquet: The True Son of Dudley T. Dougherty, Beeville, TX”;
  - ii. “John Bocquet (Dougherty) is not a stakeholder, landowner, or a family member”;
  - iii. “John Bocquet (Dougherty)’s DNA will indicate he is the son of a Dudley T. Dougherty of Beeville, TX and is not true family of Bocquet & Beechie – in name only”;
  - iv. “John Bocquet (Dougherty), Bastard Son & Result of an Extra-Marital Affair”;
  - v. “The extra-marital affair and activity between Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty was disclosed during a meeting at Beeville Country Club.”;



- vi. "Two siblings, Johnye Jamison and Jane Pugh Jamison . . . informed of the extra-marital affair, counseled Myrtle Nell Rosebrock Bocquet on the importance of staying married to Robert Bocquet for the sake of the child, and to honor the Catholic church doctrine.";
  - vii. "There was no love between Myrtle Nell Rosebrock Bocquet and Robert Bocquet. In fact, Myrtle Nell Rosebrock Bocquet did not share a bedroom with her husband. She instead slept upstairs in her bastard son's room";
  - viii. "Robert Bocquet, illegitimate father of John Bocquet (Dougherty) – (name only)";
  - ix. A reference to Dudley T. Dougherty as Plaintiff's father; and
  - x. Multiple references to Plaintiff as "John Bocquet (Dougherty)";
- (e) Statements falsely alleging that Plaintiff John and his mother abused John's father, Robert Bocquet, including without limitation the following statements:
- i. "John Bocquet (Dougherty) gun-whipped his father and had Robert Bocquet jailed to expedite his potential inheritance, and acquisition of land, farming equipment, and his father's life-long accomplishments and wealth";
  - ii. That Robert Bocquet was "gun-whipped" and had to attempt to "protect himself from the abuse from the hands of John Bocquet" (which was paired with a picture of Robert Bocquet); and
  - iii. That Plaintiff's mother made a call "admitting to and confirming the current and past (all) abuse against Robert Bocquet from her and her son" (Plaintiff);
- (f) Statements falsely accusing Plaintiff of violent acts, including without limitation the following statements:



- i. "John Bocquet (Dougherty) verbally and physically abused his ex-wife and step daughter [disturbing detail omitted]"; and *anonymous submissions!*
- ii. "John Bocquet (Dougherty) fired a high-powered rifle on children exploring a neighboring property he had recently acquired through financial default and auction. (The previous owners were unable hold on to the property in times of hardship with the county. John took it upon himself to ensure the county was notified in a timely manner and did all in his power to win at auction) Police were later called to his residence after he was reported to have fired multiple rounds towards children on the property.";
- (g) Statements falsely suggesting that Plaintiff allowed other persons to engage in dangerous activities at the Helotes Property, including that "Kolten Motes, with his wife, Taylor Baliff, were discovered firing high-powered rifles into the state park, towards its visitors and also the homes in Helotes Ranch Acres neighborhood. This put state park attendees and direct neighbors in danger."; and *-J. Leo*
- (h) Statements falsely accusing Plaintiff of theft and of being otherwise untrustworthy, including without limitation the following statements:
- i. "John Bocquet (Dougherty), Personal Gain & Financial Consequence to Others";
- ii. "Information represented here to date . . . illustrate the strong distinction that Mr. Bocquet's 'business,' as he referred to his practice, is morally ambiguous, and those that participate are subject to great financial loss.";
- iii. "Before the death of Myrtle McKinney Rosebrock (grandmother), John Bocquet (Dougherty) conned her for \$30,000" and Plaintiff's mother "concealed the theft";
- iv. That Plaintiff was "sued by his employer for theft";



- v. That Plaintiff “conned and collected money from those that trusted him, along with family members – many thousands of dollars.”;
  - vi. That “When the RV company hoax was uncovered, he [Plaintiff] swindled the same persons again for the legal authority to fight on their behalf, resulting in an even greater financial scheme to defraud.”;
  - vii. That Plaintiff “comes from a line of family that prey on rural populations in times of hardship. The acts are entirely intentional, especially with distinct, prior knowledge of said hardship or immanent financial default. The actions and services, whether desired or not, were rendered – even forced – and recipients are penalized for failing to see through the scheming until it is too late.”;
  - viii. That Plaintiff has a “lack of integrity”, preventing Robert Bocquet’s trust;
  - ix. “Complete control of [Robert Bocquet’s] funds by a family member outside of the immediate household was necessary, due to the greed and extreme desire for his estate and wealth.”; and
  - x. “John Bocquet (Dougherty) maintains the perception of an obsequious, parasitic wealth-seeking leech.”.
49. Additionally, Plaintiff (through his counsel) discovered on or about April 25, 2024, that when the picture of Plaintiff’s father posted on the Website is opened in a new tab, that picture is labeled as “John\_Bocquet\_beat\_father-to-death.png” – a false and defamatory statement. A true and correct copy of a printout of [http://johnbocquet.com/John\\_Bocquet\\_beat\\_father-to-death.png](http://johnbocquet.com/John_Bocquet_beat_father-to-death.png) showing that label is attached hereto as **Exhibit H**.



50. Each of the statements published by Defendant quoted and/or referenced in Paragraphs 48(a)-(h) and 49 above (which are hereinafter referred to as the "Website False Statements") is false.
51. Defendant also made multiple false, defamatory and disparaging publications concerning Plaintiff on Defendant's YouTube page, including without limitation one that appears to have been posted on or about May 7, 2022 (the "May 7, 2022 YouTube Post", a printout of which is attached hereto as Exhibit I), stating the following:

John Bocquet is not a landowner, simply a track-loader operator and furniture salesman. The sudden idea to take advantage of Kolten Motes of Rockin' M for the use of a track loader, and clear a 60' swath across (11) different owners' property with undivided interest.....one will never understand. This video exemplifies only part of a great abundance of devastation, along a bordering fence with a Park. *Went to*

All that is now destroyed, was once a beautiful place. It was once experienced by my family, personally my entire life, and my son's experience in the same. Unfortunately, the land cannot be un-bulldozed.

This man is not family. This family does not do these things. We are upright and honest. We do not pistol-whip our fathers, or pander to our mothers for money. We are a family that works hard for our accomplishments. We do not sue or throttle our loved ones, or steal their accomplishments.

John Bocquet has never maintained a job, a relationship or was the recipient of much fondness or esteem from family, because he's a freeloader....and perceived as fodder without use.

The "survey" in mention, appraisal, and all other legal documentation already assembled to allow for divided interest, perhaps for John Bocquet to someday own this land, were accomplished and paid for prior to his destructive return to the ranch.

As exemplified with decisions like this he continues to fit the mould. and perception. As they say: "He's not the sharpest tool in the shed"

If John Bocquet has wronged you. Stolen from you, or burdened you with his incapacities. Please use contact information on JohnBocquet.com to get in touch (You can also leave comment here)



This is not the first time he's displayed such idiocy. The hope is that we don't discover him living in the 50yo dilapidated shanty house, hording wallpaper peeing in water jugs (again).

little house  
16500

52. Multiple of the above statements are false, including, but not limited to statements that Plaintiff: (1) "is not a landowner"; (2) was "tak[ing] advantage of Kolten Motes"; (3) "destroyed" property; (4) "pistol-whip[ped], "throttle[d]" or "st[ole]" from loved ones; (5) "never maintained a job [or] relationship"; (6) is a "freeloader"; (7) engaged in a "destructive return to the ranch"; and (8) "pee[d] in water jugs".
53. Each of the statements published by Defendant quoted and/or referenced in Paragraph 52 above (*which are collectively hereinafter referred to as the "YouTube False Statements",* and jointly with the Website False Statements called the "False Statements") is false.
54. Defendant's publication of the False Statements foreseeably and directly caused Plaintiff injury and damages, including without limitation in the following ways:
- A. The False Statements directly resulted in special damages to Plaintiff, including without limitation, the following: due to review by persons in the investment community and U.S. Government of the false information posted by Defendant and such persons' expression of concern to the Chairman and controlling shareholder of a company of which Plaintiff also was a Board member, that Chairman required Plaintiff's resignation from the Board on or about April 8, 2024, expressing a concern about the negative impact on fundraising and contracting efforts that such publicly posted information was having and likely would have; that required resignation has cost Plaintiff \$5,000 per month in stock awards and fees of \$1,000 per Board meeting, totaling at least \$64,000 per year;

youtube  
who is up  
per sales  
not to community



- B. One or more persons with whom Plaintiff has had initial social contacts have found one or more of the False Statements on the web and notified Plaintiff of such discovery and either expressed or acted upon discomfort with continued interactions or ceased further interactions;
- C. One or more lenders considering loans to Plaintiff and/or to his one of his businesses found one or more of the False Statements on the web and, after mentioning such information or asking Plaintiff about it, declined to continue with any loan process to closing, thus raising the direct and indirect cost of borrowing significantly.
55. Plaintiff never authorized the use of his name in any email address or website to be used by Defendant. *Lanham Act!*
56. On information and belief, Defendant knew or at the very least should reasonably have known that the statements referenced in paragraphs above were false.

## V. CAUSES OF ACTION

### Count One: Defamation

57. Paragraphs 1 through 56 are incorporated by reference as if fully restated in this Count.
58. The publication of the Website, as discovered by Plaintiff (through his counsel) on or about May 22, 2023, constituted the publication of one or more false statements (including without how was 1st draft obtained? limitation the Website False Statements) of fact to a third party.
59. The Website False Statements were and are defamatory and concern Plaintiff John Bocquet.
60. Plaintiff is a private individual, not a public figure or official. *wiki - ~~the~~ Internet*
61. Defendant published the Website False Statements with actual malice. *Lanham*
62. Defendant published the Website False Statements with knowledge of their falsity and/or with reckless disregard for their truth. *LEXUS NISS - [2021] EWHC 3252/Q13*



63. In the alternative, Defendant's publication of the Website False Statements was negligent.
64. Defendant knew or reasonably should have known that the Website False Statements were false.
65. The publication of the Website False Statements has resulted in damages to Plaintiff, including without limitation, the following:
- A. due to review by persons in the investment community and U.S. Government of one or more of the False Statements posted by Defendant and such persons' expression of concern to the Chairman and controlling shareholder of a company of which Plaintiff also was a Board member, that Chairman required Plaintiff's resignation from the Board on or about April 8, 2024, expressing a concern about the negative impact on fundraising and contracting efforts that such publicly posted information was having and likely would have. That required resignation has cost Plaintiff \$5,000 per month in stock awards and fees of \$1,000 per Board meeting, totaling at least \$64,000 per year. *which company? - Fintech?*
  - B. One or more persons with whom Plaintiff has had initial social contacts have found one or more of the False Statements on the web and notified Plaintiff of such discovery and either expressed or acted upon discomfort with continued interactions or ceased further interactions, thus causing Plaintiff significant embarrassment and humiliation;
  - C. One or more lenders considering loans to Plaintiff and/or to his one of his businesses found one or more of the False Statements on the web and, after mentioning such information or asking Plaintiff about it, declined to continue with any loan process to closing, thus raising the direct and indirect cost of borrowing significantly.



66. Accordingly, Plaintiff hereby sues Defendant for defamation, and for all of Plaintiff's recoverable damages proximately caused thereby, and for exemplary damages pursuant to Tx. Civ. Prac. & Rem. § 41.003.

**Count Two: Defamation *Per Se***

67. Paragraphs 1 through 66 are incorporated herein by reference as if fully restated in this Count.

68. Several of the Website False Statements were so obviously harmful that general damages such as mental anguish and loss of reputation can be presumed.

69. Several of the Website False Statements impute the commission of one or more crimes to the Plaintiff, including without limitation the following statements:

- a. "Before the death of Myrtle McKinney Rosebrock (grandmother), John Bocquet (Dougherty) conned her for \$30,000. His mother, Myrtle Nell Rosebrock Bocquet, protected him, concealed the theft . . . ."
- b. "When the RV company hoax was uncovered, he swindled the same persons again . . . resulting in an even greater financial scheme to defraud."
- c. "John Bocquet (Dougherty) gun-whipped his father and had Robert Bocquet jailed to expedite his potential inheritance, and acquisition of land, farming equipment, and his father's life-long accomplishments and wealth."
- d. "This picture [of Robert Bocquet] was taken before being gun-whipped and attempting to protect himself from the abuse from the hands of John Bocquet (Dougherty)."
- e. "John\_Bocquet\_beat\_father-to-death."
- f. "John Bocquet (Dougherty) fired a high-powered rifle on children" and "he was reported to have fired multiple rounds towards children on the property."



- g. "John Bocquet (Dougherty) . . . abused his ex-wife and step daughter".
- h. "Johnye Jamison and Jane Pugh Jamison accepted a call from Myrtle Nell Rosebrock Bocquet admitting to and confirming the current and past (all) abuse against Robert Bocquet from her and her son." *why [scribble] stop bulldozing while [scribble]??*
- i. "John Bocquet (Dougherty) and Kolten Motes immediately attempted to flee the scene. John Bocquet (Dougherty) struck another man in the video with his vehicle and then abandoned Kolten Motes entirely, in attempts to fee [sic] from the sheriff". *??*
- j. "John Bocquet (Dougherty) sought to destroy multiple real property he does not have interest in".
- k. "Kolten Motes, managed by John Bocquet (Dougherty), bulldozed across 144 acres in absolute trespass."
- l. "As an act of revenge, John Bocquet (Dougherty) gave authorization to Rockin' M business owner Kolten Motes to devastate the land. . . . John Bocquet (Dougherty) purposely diminished the value of the property as an act of revenge and to devalue the land for his own purpose."
- m. "(Opinion) All that John Bocquet (Dougherty) has destroyed was once a beautiful place, experienced and maintained by four generations of family. It is truly unfortunate there is not a machine in existence that can un-bulldoze said destruction."
70. Such statements falsely indicate that Plaintiff has violated Texas criminal statutes, including one or more of the following sections of the TEXAS PENAL CODE § 22.01 (Assault); § 22.02 (Aggravated Assault); § 22.04 (Injury to a Child, Elderly Individual, or Disabled Individual); §19.01 (Criminal Homicide); § 31.03 (Theft); and § 28.03 (Criminal Mischief).



71. Several of the Website False Statements also impute sexual misconduct to Plaintiff's mother, Myrtle Bocquet, including without limitation Defendant's false claims that Myrtle had an extra-marital affair leading to the birth of Plaintiff.
72. Several of the Website False Statements are also injurious to Plaintiff's office, business, profession, or calling, including without limitation, Defendant's false statements that Plaintiff's business, Rocking M, was involved in trespassing onto property, and then causing destruction and devastation of that property.
73. Accordingly, Defendant committed defamation *per se* by libel on its face against Plaintiff.
74. Accordingly, Plaintiff hereby sues Defendant for defamation *per se*, and for all of Plaintiff's recoverable general damages and special damages proximately caused thereby, and exemplary damages pursuant to Tx. Civ. Prac. & Rem. § 41.003.

### **Count Three: Business Disparagement**

75. Paragraphs 1 through 74 are incorporated herein by reference as if fully restated in this Count.
76. The publication on the Website, as discovered by Plaintiff soon after receiving Defendant's May 12, 2022 text messages, constituted the publication by Defendant of false and disparaging information about the Plaintiff.
77. The new publication on the Website by Defendant between May 31, 2022, and June 8, 2022, (which was re-written to contain new false, disparaging and defamatory statements concerning Plaintiff) constituted a publication by Defendant of false and disparaging information about Plaintiff.



78. All subsequent new publications on the Website by Defendant (including without limitation the publication discovered by Plaintiff on or about May 25, 2023), constituted the publication by Defendant of disparaging of false and disparaging information about Plaintiff.
79. The publication of the May 7, 2022, YouTube Post also constituted the publication by Defendant of false and disparaging information about Plaintiff.
80. All such publications were made by Defendant with malice. *wiki - information only*
81. Defendant published the False Statements with knowledge that such statements were false or with reckless disregard of whether such statements were true or not. *- fact, real, warning*
82. None of the above-identified publications were subject to any privilege. *wiki! public!*
83. The above-identified publications resulted in special damages to Plaintiff, including without limitation, the following: due to review by persons in the investment community and U.S. Government of the false information posted by Defendant and such persons' expression of concern to the Chairman and controlling shareholder of a company of which Plaintiff also was a Board member, that Chairman required Plaintiff's resignation from the Board on or about April 8, 2024, expressing a concern about the negative impact on fundraising and contracting efforts that such publicly posted information was having and likely would have. That required resignation has cost Plaintiff \$5,000 per month in stock awards and fees of \$1,000 per Board meeting, totaling at least \$64,000 per year.
84. Accordingly, Plaintiff hereby sues Defendant for business disparagement, and for all of Plaintiff's recoverable damages proximately caused thereby, and for exemplary damages pursuant to Tx. Civ. Prac. & Rem. § 41.003.

**Count Four: Intentional Infliction of Emotional Distress**

85. Paragraphs 1 through 84 are incorporated by reference as if fully restated in this Count.



86. Defendant's conduct and actions in causing the publications of the False Statements was extreme and outrageous, and he acted intentionally or recklessly.
87. Such Defendant's conduct and actions caused Plaintiff emotional distress, and the emotional distress was severe.
88. As a direct and foreseeable result of such Defendant's actions, Plaintiff suffered humiliation, embarrassment, anger, worry, indignation, shame, despair and public humiliation.
89. Plaintiff's distress has been so severe that no reasonable person should be expected to endure it.
90. Plaintiff sues Defendant for intentional infliction of emotional distress and for all recoverable damages caused thereby.
91. In addition to the other recoverable damages that Plaintiff seeks to recover from the Defendant, Plaintiff seeks recovery of exemplary damages under TEX. CIV. PRAC. & REMEDIES CODE §§ 41.001 ET SEQ., as further described in Count Seven hereof, because Defendant caused harm to Plaintiff that resulted from Defendant's malice.

**Count Five: Permanent Injunction**

92. Paragraphs 1 through 91 are incorporated herein by reference as if fully restated in this Count.
93. Defendant's publications of the False Statements constitute wrongful acts.
94. Plaintiff has brought claims of defamation, defamation per se, business disparagement, and intentional infliction of emotional distress against Defendant.
95. Plaintiff will succeed on the merits of his claims for defamation, defamation per se, and business disparagement by establishing the following:



- a. Defendant published false statements of fact (the "False Statements") to third parties through multiple publications on the Website, and through publication of the May 7, 2022, YouTube Post;
  - b. The False Statements were defamatory statements concerning Plaintiff;
  - c. The False Statements were disparaging words about Plaintiff's economic interests;
  - d. Defendant published the defamatory False Statements with knowledge of their falsity and/or with reckless disregard for their truth, or, at the very least, negligently;
  - e. Defendant published the disparaging False Statements with knowledge of their falsity and/or with reckless disregard for their truth;
  - f. Several of the Website False Statements were defamatory *per se*, including because they (1) impute the commission of a crime; (2) impute sexual misconduct; and/or (3) cause injury to Plaintiff's business;
  - g. Plaintiff has been and will continue to be damaged by the publication of the False Statements;
96. Plaintiff will succeed on the merits of his claim for intentional infliction of emotional distress by establishing that: (a) Defendant acted intentionally or recklessly in publishing the False Statements; (b) Defendant's conduct was extreme and outrageous; (c) Defendant's outrageous conduct caused Plaintiff severe emotional distress.
97. Plaintiff will suffer probable, imminent, and irreparable injury in the absence of permanent injunctive relief as requested.
98. Plaintiff has no fully adequate remedy at law. While Plaintiff can be compensated for special damages accrued to date resulting from Defendant's acts, it is impossible to know the extent



of Plaintiff's future damages in the event that the False Statements continue to exist on the internet.

99. Accordingly, Plaintiff is entitled to permanent injunctive relief to require Defendant to remove the False Statements from the Website and from the May 7, 2022 YouTube Post.

**Count Six: Request for Declaratory Judgment**

100. Paragraphs 1 through 99 are incorporated herein by reference as if fully restated in this Count.

101. There are matters in controversy between Plaintiff and Defendant concerning their rights, status and legal relations.

102. Pursuant to CHAPTER 37 OF THE TEXAS CIVIL PRACTICE AND REMEDIES CODE, Plaintiff seeks a declaratory judgment by this Court that:

- A. The False Statements contained on the Website are false;
- B. The False Statements contained on the May 7, 2022, YouTube Post are false; and
- C. Defendant published or caused to be published the False Statements with knowledge of their falseness.

103. Defendant's actions have necessitated that Plaintiff expend attorney's fees and litigation costs. Pursuant to Texas Civil Practice and Remedies Code § 37.009, Plaintiff seeks recovery of his reasonable and necessary attorneys' fees and costs.

**Count Seven: Exemplary Damages Under TEX. CIV. PRAC. REM CODE § 41.001 ET SEQ.**

104. Paragraphs 1 through 103 are incorporated by reference as if fully restated in this Count.

105. Defendant caused harm to Plaintiff that resulted from fraud, malice or gross negligence, and Plaintiff avers that he will prove that fact by clear and convincing evidence.



106. Accordingly, Plaintiff seeks recovery of an amount of exemplary damages from Defendant up to but that does not exceed the greater of: (1)(A) two times the amount of economic damages; plus (B) an amount equal to any noneconomic damages found by the jury, not to exceed \$750,000; or (2) \$200,000.

**VI. DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury. Plaintiff acknowledges payment on the date of filing of the required jury fee.

**VII. PRAYER FOR RELIEF**

**WHEREFORE, PREMISES CONSIDERED,** plaintiff **JOHN W. BOCQUET** respectfully prays that:

- A. Defendant **CHARLES GRAHAM COHEN**, be cited to appear and answer herein;
- B. After trial on the merits, this Court enter judgment in favor of plaintiff **JOHN W. BOCQUET** and against defendant **CHARLES GRAHAM COHEN** as follows:
  - (1) On Counts One, Two, Three, and Four, for all recoverable damages of every kind and character, including without limitation actual, consequential, and incidental damages, and exemplary damages pursuant to TX CIV. PRAC. & REM. § 41.003;
  - (2) For the Permanent Injunction requested in Count Five;
  - (3) For the Declaratory Judgment requested in Count Six;
  - (4) For Plaintiff's reasonable and necessary attorney's fees incurred in this action, pursuant to TEXAS CIVIL PRACTICE AND REMEDIES CODE § 37.009;
  - (5) For exemplary damages under TEXAS CIVIL PRACTICE AND REMEDIES CODE §§ 41.001 ET SEQ.;



- (6) For all applicable pre-judgment interest and post-judgment interest at the maximum legal rate provided by applicable law; *and*
- C. Defendant pay all costs of Court; *and*
- D. Plaintiff be awarded all such other and further relief, legal and equitable, to which Plaintiff may be justly entitled.

Respectfully submitted,

**LANE & COUNTRYMAN**  
**1045 Cheever Boulevard, Suite 103**  
**San Antonio, Texas, 78217**  
**(210) 828-8900 – Office**  
**(210) 804-2339 – Facsimile**

By: /s/ Matthew J. Countryman  
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**E-Mail: [dneelon@bostonilg.com](mailto:dneelon@bostonilg.com)**

/s/ Daniel P. Neelon  
**Daniel P. Neelon**  
State Bar No. 14861660  
**Attorney for Plaintiff,**  
**JOHN W. BOCQUET**



MAY-19-75 69490 B-I

350

553374

GENERAL WARRANTY DEED

THE STATE OF TEXAS I  
COUNTY OF BEXAR I

KNOW ALL MEN BY THESE PRESENTS:

That I, IDA HENDERSON, a single woman, of the County of Bexar, State of Texas, for and in consideration of the sum of Ten Dollars (\$10.00) and other valuable and sufficient consideration to me in hand paid by ROBERT AUGUST BOCQUET, PHILIP EDMUND BOCQUET, MALCOLM OSCAR BOCQUET, and BLANCHE EUGENIA BEECHIE, the receipt whereof being hereby fully acknowledged, have GRANTED, SOLD AND CONVEYED, and by these presents do GRANT, SELL AND CONVEY unto the said ROBERT AUGUST BOCQUET, of the County of Bee, State of Texas; and unto the said PHILIP EDMUND BOCQUET, of the County of Washington, State of Arkansas; unto the said MALCOLM OSCAR BOCQUET, of the County of Aransas, State of Texas; and unto the said BLANCHE EUGENIA BEECHIE, of the County of Bee, State of Texas; all in equal parts and shares, and all as a part of their respective property and estate, all of the following described real estate and premises lying and being situated in the County of Bexar, State of Texas, to-wit:

160 acres of land situated on the water of Melotes Creek, and known and described as the Michael Brenk Survey No. 501, containing 160 acres, and which was patented to Michael Brenk by the State of Texas by Patent No. 73, Volume 41, dated May 9, 1873, and which said patent is recorded in Volume X No. 1, Page 350, Deed Records of Bexar County, Texas, to which express reference is here made. The above described property and premises is the same identical property which was conveyed by Oscar Henderson and others to Ida Henderson, the Grantor herein, by Deed which appears duly recorded in Volume 2343, Pages 516-518, Deed Records of Bexar County, Texas. Express reference is here made to said above mentioned patent and to said deed for a more full and complete description of said 160 acres of land.

Expressly EXCEPTING, however, from said 160 acre Survey of land above described, all that certain tract or parcel of land containing 15 acres of land conveyed by Ida Henderson to Willie Granata and thereafter conveyed by Willie Granata to Louis J. Pantusa by deed dated February 22, 1973, recorded in Volume 7035, page 650, Deed Records of Bexar County, Texas, to which express reference is here made for a description of said 15 acres of land excepted from this conveyance.

ma 7583 ma 876



There is also hereby conveyed unto the  
Grantee herein all of the Grantor's right, title  
and interest in and to any and all easements and  
easements providing ingress and egress to and from  
the property and premises hereby conveyed.

IN WITNESS WHEREOF I have hereunto signed my hand and  
affirmed with all and singular the rights and appurtenances therein  
in anywise belonging, unto the said ROBERT MONROE MONROE, PHILIP  
MONROE MONROE, MONROE MONROE MONROE, and MONROE MONROE MONROE,  
their heirs and assigns forever; and I do hereby bind myself, my  
heirs, successors and administrators, to WARRANT AND FOREVER DEFEND  
all and singular the said property and premises unto the said ROBERT  
MONROE MONROE, PHILIP MONROE MONROE, MONROE MONROE MONROE, and  
MONROE MONROE MONROE, their heirs and assigns, against every  
person whatsoever lawfully claiming or to claim the same or any part  
thereof.

WITNESSED my hand at San Antonio, Texas, on this the 9th  
day of May, 1974.

*[Signature]*  
ROBERT MONROE

THE STATE OF TEXAS |  
COUNTY OF BEXAR |

Before me, the undersigned authority, on this day personally  
appeared the said ROBERT MONROE, a single woman, known to me to be the person  
whose name is subscribed to the foregoing instrument, and acknowledged  
to me that she executed the same for the purposes and consideration  
therein expressed.

Given under my hand and seal of office on this the 9th  
day of May, 1974.

*[Signature]*  
Notary Public, Bexar County, Texas  
HERALD E. SMITH  
Notary Public, Bexar County, Texas





IDA HENDERSON

TO

ROBERT AUGUST BOCQUET,  
PHILIP EDMUND BOCQUET,  
MALCOLM OSCAR BOCQUET, and  
BLANCHE EUGENIA DEECHIE

GENERAL WARRANTY DEED

MAY 19 PM 2 41

FRED M. MY OFFICE  
JAMES W. MCKENNA  
CLERK OF DISTRICT COURT  
BEXAR CO.



MAY 20 1975

*James W. McKenna*  
COUNTY CLERK  
BEXAR COUNTY, TEXAS

STATE OF TEXAS  
COUNTY OF BEXAR  
I hereby certify that this instrument was filed on the  
20th day of May 1975 at 2:41 PM in the County Clerk's  
office and is the true and correct copy of the original  
RECORDED in the Public Records of the County of Bexar,  
State of Texas, as required by law.

*When recorded  
please return to*

→ **BANKS & BANKS**  
ATTORNEYS AT LAW  
616 MIAMI BUILDING  
SAN ANTONIO, TEXAS 78208

EX-7583 MAY 878



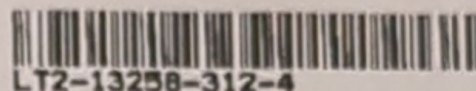


## Exhibit B

**NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OF THE FOLLOWING INFORMATION FROM THIS INSTRUMENT BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.**

### **Special Warranty Deed**

**Date:** December 3, 2007



**Grantor:** Robert A. Bocquet

**Grantor's Mailing Address:** P.O. Box 41  
Beeville, TX 78104  
Bee County

**Grantee:** Robert A. Bocquet and Myrtle R. Bocquet, Trustees, or successors  
in Trust under the Bocquet Living Trust, dated December 3, 2007

**Grantee's Mailing Address:** P.O. Box 41  
Beeville, TX 78104  
Bee County

**Consideration:** Ten Dollars and other good and valuable consideration.

### **Property (including any improvements):**

An undivided one-fourth (1/4<sup>th</sup>) interest in and to the following described real property and premises situated in Bexar County, State of Texas, to wit:

See Attached Exhibit "A"

### **Reservations from and Exceptions to Conveyance and Warranty:**

Validly existing easements, rights-of-way, and prescriptive rights, whether of record or not; all presently recorded and validly existing instruments, other than liens and conveyances, that affect the Property; and taxes for the current year, which Grantee assumes and agrees to pay.

Grantor, for the consideration, receipt of which is acknowledged, and subject to the Reservations from and Exceptions to Conveyance and Warranty, grants, sells and conveys to Grantee the Property, together with all and singular the rights and appurtenances thereto in any way belonging, to have and to hold it to Grantee and Grantee's successors, and assigns forever. Grantor binds Grantor and Grantor's heirs, executors, administrators and successors to warrant and forever defend all and singular the Property to Grantee and Grantee's successors, and assigns against every person whomsoever lawfully claiming or to claim the same or any part thereof, except as to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty, when the claim is by through or under Grantor, but not otherwise.

By acceptance of this Deed, Grantees shall be bound to hold the Property as trustees upon the terms and conditions of the agreement creating the Bocquet Living Trust. Parties dealing with the



Trustees of the Bocquet Living Trust shall have no duty to inquire beyond this deed into the power of the Trustees, or their successors, to sell, lease, partition, exchange, encumber, or otherwise make disposition of the Property; and anyone making payment to the Trustees for the purchase or use of the Property shall not be responsible for the proper allocation of the payment according to the terms of the agreement creating the Bocquet Living Trust.

When the context requires, singular nouns and pronouns include the plural.

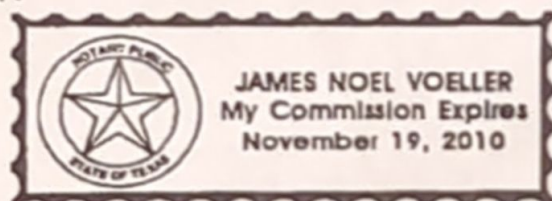
Robert A. Bocquet  
Robert A. Bocquet, Grantor

Robert A. Bocquet  
Robert A. Bocquet, Trustee

Myrtle R. Bocquet  
Myrtle R. Bocquet, Trustee

STATE OF TEXAS                     )  
  )  
COUNTY OF COMAL                )

This instrument was acknowledged before me on December 3, 2007, by Robert A. Bocquet.



James N. Voeller  
Notary Public

PREPARED WITHOUT OPINION  
OR REVIEW OF TITLE BY:  
Law Office of James N. Voeller  
19311 FM 2252  
Garden Ridge, TX 78266

AFTER RECORDING RETURN TO:  
Law Office of James N. Voeller  
19311 FM 2252  
Garden Ridge, TX 78266



### EXHIBIT "A"

160 acres of land situated on the water of Helotes Creek, and known and described as the Michael Brenk Survey No. 501, containing 160 acres, and which was patented to Michael Brenk by the State of Texas by patent No. 73, Volume 41, dated May 9, 1873, and which said patent is recorded in Volume X No. 1, Page 350, Deed Records of Bexar County, Texas, to which express reference is here made. The above described property and premises is the same identical property which was conveyed by Oscar Henderson and others to Ida Henderson, by Deed which appears duly recorded in Volume 2343, pages 516-518, Deed Records of Bexar County, Texas. Express reference is heremade to said above mentioned patent and to said deed for a more fully and complete described of said 160 acres of land.

EXPRESSLY EXCEPTING HOWEVER, from said 160 acre Survey of land above described, all that certain tract or parcel of land containing 15 acres of land conveyed by Ida Henderson to Willie Granata and thereafter conveyed by Willie Granata to Louis J. Pantusa by deed dated February 22, 1973, recorded in Volume 7035, page 650, Deed Records of Bexar County, Texas, to which express reference is here made for a description of said 15 acres of land excepted from this conveyance.

There is also hereby expressly conveyed unto the Grantee herein all the Grantor's right, title and interest in and to any and all roadways and easements providing ingress and egress to and from the property and premises hereby conveyed; and,

BEING the same property heretofore conveyed by Ida Henderson, a single woman, to Robert August Bocquet et al, by General Warranty Deed dated May 9, 1975, and recorded in Bexar County, Deed Records Volume 7583 on pages 876-878; and

SAVE AND EXCEPT, there is further excepted from this conveyance, a two-acre tract of land conveyed by Robert A. Bocquet and wife Myrtle R. Bocquet, et al, to Blanche Eugenia Beechie, by deed dated April 19, 1976. Said two acre tract being further described as follows:

BEING a two acre tract of land out of the Michael Brenk Survey No. 501, in Bexar County, Texas, patented by the State of Texas to Michael Brenk by Patent No. 73, Volume 41, dated May 9, 1873, and recorded in Volume X, page 35 of the Deed Records of Bexar County, Texas, and being a part of the 145 acre tract out of said survey conveyed by Ida Henderson to Robert August



Bocquet and others by deed dated May 9, 1975 and duly recorded in said Deed Records, and being further described as follows:

COMMENCING at the water well located on said 145 acre tract, which well is located approximately 1277.25 feet from the north boundary thereof and approximately 513.5 feet from the west boundary thereof, in quest of the place of beginning;

THENCE in a northerly direction parallel with the west boundary of said 145 acres 20 feet;

THENCE in a westerly direction parallel with the north boundary of said 145 acres 40 feet to the place of beginning;

THENCE easterly and parallel with said north boundary 295.16 feet to the northeast corner of this tract;

THENCE southerly and parallel with said west boundary 295.16 feet to the southeast corner of this tract;

THENCE westerly and parallel with said north boundary 295.16 feet to a point in said west boundary and the southwest corner of this tract;

THENCE northerly with said west boundary 295.16 feet to the place beginning.

All of the foregoing property hereby conveyed, subject to the foregoing exceptions, being the same property heretofore conveyed by Robert A. Bocquet and Myrtle R. Bocquet, as Trustee of the R. A. & M. R. Bocquet Living Trust under the provisions of a trust agreement dated the 5<sup>th</sup> day of February 1997, to Robert A. Bocquet, as part of his sole and separate property, by deed recorded in Bexar County Deed Records, Document #20050108725, Volume 11399, Pages 2246, et seq.

Doc# 20070285695 Fees: \$28.00  
12/11/2007 1:59PM # Pages 4  
Filed & Recorded in the Official Public  
Records of BEXAR COUNTY  
GERARD RICKHOFF COUNTY CLERK

Any provision herein which restricts the sale, or use of the described real property because of race is invalid and unenforceable under Federal law STATE OF TEXAS, COUNTY OF BEXAR  
I hereby certify that this instrument was FILED in File Number Sequence on this date and at the time stamped hereon by me and was duly RECORDED in the Official Public Record of Real Property of Bexar County, Texas on:

DEC 11 2007



*Gerard Rickhoff*  
COUNTY CLERK BEXAR COUNTY, TEXAS



**APPOINTMENT OF CO-TRUSTEE  
REGARDING THE BOCQUET LIVING  
TRUST, AND OF THE SURVIVOR'S TRUST  
AND MARITAL TRUST THEREUNDER**

The undersigned Myrtle R. Bocquet, surviving Grantor and sole Trustee of the Bocquet Living Trust and of the Survivor's Trust and Marital Trust created in and as defined in the terms of the Bocquet Living Trust dated December 3, 2007 (the "Trust Agreement") hereby appoints her son, John W. Bocquet, as her co-Trustee of the Bocquet Living Trust and of the Survivor's Trust and the Marital Trust created thereunder, as well as of any other trusts, if any, created thereunder of which she is Trustee, without affecting his appointment as successor Trustee of the Bocquet Living Trust and of any trusts created thereunder in accordance with prior appointment documents.

THIS APPOINTMENT OF CO-TRUSTEE IS SIGNED AND EFFECTIVE  
FEBRUARY 13<sup>th</sup>, 2019.

*Myrtle R. Bocquet*

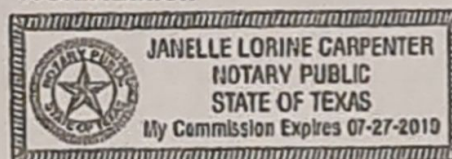
MYRTLE R. BOCQUET, SURVIVING GRANTOR  
AND TRUSTEE OF THE TRUSTS REFERENCED  
ABOVE

WITNESS:

*John W. Bocquet*  
John W. Bocquet

**Notarization**

STATE OF TEXAS )  
COUNTY OF BEE )



Before me, the undersigned notary public, on this day personally appeared Myrtle R. Bocquet, as Grantor and Trustee, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that she executed the same in the capacities and for the purposes and consideration therein expressed.

Given under my hand and seal of office this 13<sup>th</sup> day of February, 2019.

*Janelle Lorine Carpenter*  
Notary Public, State of Texas



Exhibit D

Dear Uncle Bob and Aunt Myrt,

I have been heavy hearted for some time now and finally felt brave enough to visit with you both about this in Corpus, but you didn't come.

The Bocquet / Henderson Helotes Property has begun passing generations. With Phil's passing, Lisa inherits his share. Our family is very close to Lisa, we comfortably manage property issues. From Uncle Malcolm to Florence, then the property passed to Florence's children. Again, our family has an amicable relationship with them. Graham, out of all Blanche's grandchildren claims the most kinship with the land (although they all are heirs), and then there's your family.

I am writing to let you know just how deeply connected our family has gotten to Laura and her children - especially the girls. Mother and Daddy just adore them, Graham feels very close. Carla, of course, is also very invested in their lives.

As I watch this bond grow, my desire to see Laura and her children as stewards to this beautiful Bocquet / Henderson family project grows by the moment. I can see fruitful partnerships between all these family members develop for the good of the "Ranchito".

I am writing to beg you to consider leaving the Helotes property to Laura and her children, it would be a beautiful investment in your family, Uncle Bob, Aunt Ida would be very pleased!

We don't feel any ill will towards John, we simply don't feel any connection. Laura, on the other hand, has become a very dear family member.

Please know this request comes with deep respect and love for you both.

Take the sweetest care,

*L. Rios*

*( John Rios )*

600001



CLAIRE BRONN

Redacted

AUSTIN, TX. 78704

POSTAGE WILL BE PAID BY ADDRESSEE  
NO POSTAGE NEEDED IF MAILED IN THE UNITED STATES



ROBERT & M. AT BEEVILLE

Redacted

BEEVILLE, TX 78101

78104004141

POSTAGE WILL BE PAID BY ADDRESSEE



Rob't

From: Joe Bruno <Redacted>  
To: <Redacted>  
Sent: Sunday, September 14, 2014 10:07 AM  
Subject: Letter

Dear Uncle Bob and Aunt Myrt,

I wrote you a letter earlier this week. I sent it snail mail to your PO box. I thought I would follow up sending the same letter via email. I will just copy it into this email since attachments are sometimes too hard to open.

Dear Uncle Bob and Aunt Myrt,

I have been heavy hearted for some time now and finally felt brave enough to visit with you both about this in Corpus, but you didn't come.

The Bocquet / Henderson Holotas Property has begun passing generations. With Phil's passing, Lisa inherits his share. Our family is very close to Lisa, we comfortably manage property issues. From Uncle Malcolm to Florence, then the property passed to Florence's children. Again, our family has an amicable relationship with them.

Graham, out of all Blanche's grandchildren claims the most kinship with the land (although they all are heirs), and then there's your family.

I am writing to let you know just how deeply connected our family has gotten to Laura and her children - especially the girls. Mother and Daddy just adore them, Graham feels very close. Carla, of course, is also very invested in their lives.

As I watch this bond grow, my desire to see Laura and her children as stewards to this beautiful Bocquet / Henderson family project grows by the moment. I can see fruitful partnerships between all these family members develop for the good of the "Ranchito".

I am writing to beg you to consider leaving the Holotas property to Laura and her children, it would be a beautiful investment in your family, Uncle Bob, Aunt Ida would be very pleased!

We don't feel any ill will towards John, we simply don't feel any connection. Laura, on the other hand, has become a very dear family member.

Please know this request comes with deep respect and love for you both.

Take the sweetest care.

Claire (Ida Claire)

600003





G

Graham



Redacted

Thu, May 12

Is it true that you're not really family?

Your mother cheated on your father and  
you are a bastard child?

8:44 pm

Let **Graham** message you and share your name and photo with them? They won't know you've seen their message until you accept.

Block

Delete

Accept





## PUBLIC INFORMATION SOURCE

Exhibit F

Wiki Contribution Hub

## John William Bocquet: The True Son of Dudley T. Dougherty, Beeville, TX:

DOB: Redacted

This is information (wiki) accumulation and beginnings of a knowledgebase, constructed for public consumption, and contribution with regard to John Bocquet (Dougherty) with additional regard to Rockin' M employee, and devastation of property at 11220 Indian Trail Helotes, TX for personal gain.

Information to date, and court evidence submitted in previous trials, indicates that the benefit from business and association with John Bocquet (Dougherty), is exclusively for John Bocquet (Dougherty).

The reason John Bocquet (Dougherty) sought to destroy property he does not own is a mystery, and refuses to correspond over the phone, text or encrypted Signal transmission - "blocked" as he said during previous conversation.

Rockin' M business owner Kolten Motes, on John Bocquet (Dougherty)'s permission, bulldozed across 144 acres in absolute trespass.

With wife, Taylor Baliff, high-powered rifles were fired into the neighboring state park and towards homes in Helotes Ranch Acres neighborhood. There is no safety in place. This put state park attendees and direct neighbors in great peril. When told they were trespassing and shooting on private property, great inconvenience was expressed and that it "created a predicament." (see video below)

As an act of revenge, John Bocquet (Dougherty) gave false authorization to Rockin' M business owner Kolten Motes to devastate the land. This was without regard for the its Specific Use, the generations of family use, and property rights of the owners. John Bocquet (Dougherty) purposely diminished the value of the property.

On discovery of said destruction in progress, John Bocquet (Dougherty) and Kolten Motes immediately attempted to flee the scene. John Bocquet (Dougherty) struck C. Graham Cohen with his vehicle, and abandoned Kolten Motes.

Along the entire fenceline shared with Government Canyon State Park, the destruction of old and timeless Oak trees, rock formations, and beautiful views cannot be undone. The ground is not only soured, it is now fully exposed and vulnerable to the Oak Wilt infestation, as evidenced on the neighboring properties.

(11) land owners have a (60) foot swath through an (144) acre plat with four (proposed) plots.

It should be noted that all stakeholders, maintain undivided interest over the entire (144) acres and John Bocquet (Dougherty) is not a stakeholder, landowner, or a family member.

These videos exemplify a small part of the larger devastation along the bordering fence with a State Park and across (11) landowners' legacies.

(Opinion) All that John Bocquet (Dougherty) has destroyed was once a beautiful place, experienced and maintained by four generations of family. It is truly unfortunate there is not a machine in existence that can un-bulldoze said destruction. He is a small man.



## It's a perfect combination

A young Kaiten Motes enjoyed playing in the dirt like most young boys do. That didn't change as he got older. As a teenager, when Kaiten was big enough to operate a tractor, it wasn't unusual to see him on a big heavy piece of equipment, pushing dirt around. One could say he can thank his mother for that as she had a small dirt company and he wasn't afraid to get out there and play on life-size version of his childhood toys.

"Since I was little, I have liked playing on big yellow tractors and I got good at it. I still think it is a lot of fun so if I can make money in the process, it's just the perfect combination."

"I always knew I want to start up my own company. That has always been my goal," says Motes. "I want to work for the pipeline or oilfield, whatever term you want to use, to earn enough capital to buy my own equipment and start my own company."

Motes started **Rocking M Contractors** in September of 2020, specializing in excavation and site development. "We have some pretty cool equipment. We can dig through rock, which is pretty neat, especially in this area," adds Motes.

When Motes and his partner, **John Bocquet**, started **Rocking M**, it was just Motes and his fiancée, **Taylor Ballitt**, before bringing on **Jacob Chapa**.

While **Rocking M** is currently busy in the residential sector, they are excited to get into bigger projects doing something different, something outside of the residential realm. Their coverage area is primarily from San Antonio to Austin and their surrounding areas. "Our services include site clearing, excavation, site development, site prep, grading, but we excel in rock excavation," says Motes. "I'm



L.R. Taylor and Kaiten

looking forward to getting into commercial work. I just have to be at the right place at the right time with the right people. I think is what it all boils down to. I have every financial resource that I could possibly need to grow the business, as far as equipment is concerned."

"I have some really good people who take care of whatever needs to be done and I have people who have been really good to me. **HoltCAT** has been pretty helpful throughout this whole deal. They take care of me."

Since the company's humble beginnings in late 2020, **Rocking M** has tripled in size with seven employees and six pieces of heavy equipment. Photo courtesy of **Mary C. Hazen Photography**.

**Rocking M Contractors** is an excavation contractor. -cmw

## John Bocquet (Dougherty), Bastard Son & Result of an Extra-Marital Affair

Birthright: John Bocquet (Dougherty)'s DNA will indicate he is the son of a Dudley T. Dougherty of Beeville, TX and is not true family of Bocquet & Beechie - in name only.

The extra-marital affair and activity between Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty was disclosed during a meeting at Beeville Country Club.

Myrtle McKinney Rosebrock (grandmother), was in attendance with Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty. The option of divorce from Robert Bocquet was strongly forbidden.

Two siblings, Johnnie Jamison and Jane Pugh Jamison, not in attendance at the meeting and informed of the extra-marital affair, counseled Myrtle Nell Rosebrock Bocquet on the importance of staying married to Robert Bocquet for the sake of the child, and to honor the Catholic church doctrine.

There was no love between Myrtle Nell Rosebrock Bocquet and Robert Bocquet. In fact, Myrtle Nell Rosebrock Bocquet did not share a bedroom with her husband. She instead slept upstairs in her bastard son's room.

John Bocquet (Dougherty) does share the name of a single, deceased member of the family, but the land is in trust and belongs to his mommy.





## John Bocquet (Dougherty) - Personal Gain at the Disadvantage of Others

John Bocquet (Dougherty) is person that makes his way through life through litigation: against his only sibling (sister), his former employers, and his aunt.

John Bocquet (Dougherty) gun-whipped his father and had Robert Bocquet jailed to expedite his potential inheritance, and acquisition of land, farming equipment, and his father's life-long accomplishments and wealth.

Johnye Jamison and Jane Pugh Jamison accepted a call from Myrtle Nell Rosebrock Bocquet admitting to and confirming the current and past (all) abuse against Robert Bocquet from her and her son.

Before the death of Myrtle McKinney Rosebrock (grandmother), John Bocquet (Dougherty) conned her for \$30,000.

His mother, Myrtle Nell Rosebrock Bocquet, protected him, concealed the theft, and earned a lesser inheritance than both sisters, as a result.

John Bocquet (Dougherty) filed suit against his sister, (John Bocquet vs Laura Bocquet). Laura Bocquet's children were also named in the suit. He sought full control of their goats.

*[Pending investigation of fact]* John Bocquet (Dougherty) was employed with a [motorhome rental company], and was sued by his employer for theft.

Such behavior, and lack of integrity, exemplifies the character of John Bocquet (Dougherty), and further prevented any sort of trust from Robert Bocquet and financial matters.

Robert Bocquet, father of John Bocquet (Dougherty) in name only, put Carla Beechie as executor of his granddaughters' college funds

Complete control of the funds by a family member outside of the immediate household was necessary, due to the



John William Bocquet

Mother and son filed suit against Carla Beechle for control of said assets. Represented by Bethune I Enright, Bar Card Number: 24082964, 117 N Washington St. Beeville, TX 78102-4508, the case was entirely squandered in favor of the Bocquets.

Jonathan Enright has yet to respond to email inquiries sent May 11th & 16th, 2022.

(Opinion) Beeville is a small town with great influence by certain parties on legal matters. Whether this firm chose to willingly act outside of the highest degree of loyalty and honesty in their fiduciary duty to Carla Beechle, remains to be determined.

(Opinion) John Bocquet (Dougherty) is perceived as a freeloader and fodder without use by his family.

(Opinion) As exemplified with decisions in the following videos, John Bocquet (Dougherty) maintains the perception of an obsequious, parasitic wealth-seeking leech.

(Opinion) Destruction of State Park and ranchland without reason, enjoyed by generations of owners, exemplifies strong indication of the foulness this person exudes.

## Destruction of Family Land & Rockin' M Operators Firing Guns into a State Park

John Bocquet & Rockin' M (Kolten Motes) - Illegal Bulldozin...



Unlawful Clearing of Private Land - Assault & Injury by Vehi...

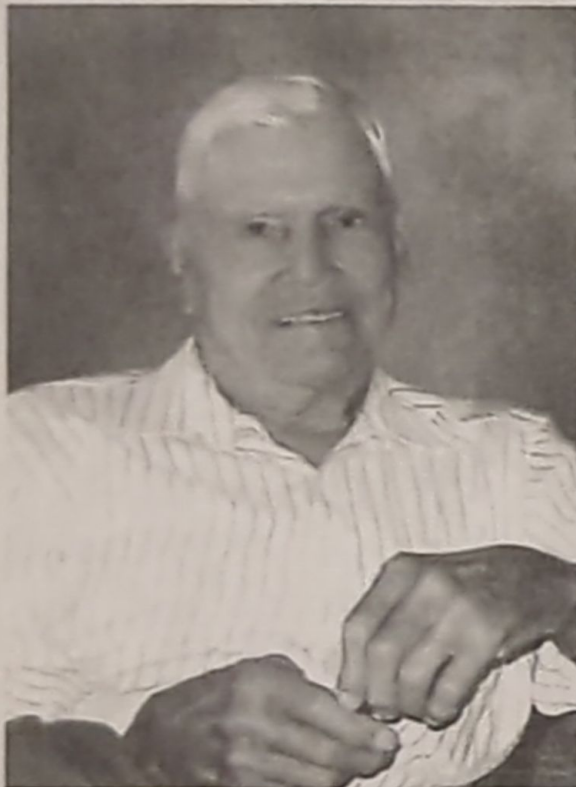




Rockin' M Owner - Kolten Motes - Unlawful Land Clearing - ...



Have a wild contribution to JohnBocquet.com? If John Bocquet (Dougherty) has wronged you, stolen from, or burdened you with his own incapacities. Please contact [johnbocquet@idtrackthat.com](mailto:johnbocquet@idtrackthat.com)

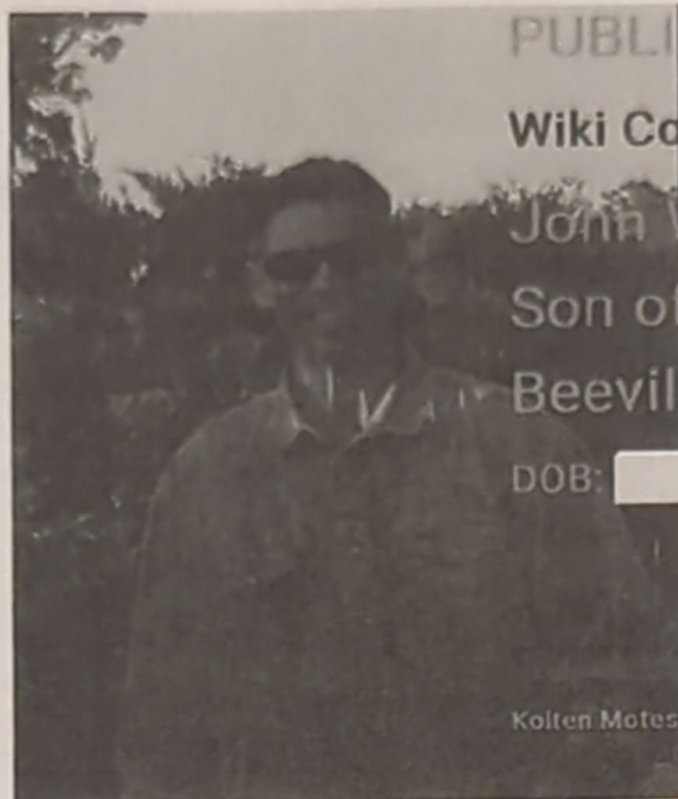


Robert Bocquet (Deceased); This picture was taken before being gun-whipped and attempting to protect himself from the abuse from the hands of John Bocquet (Dougherty).



## Exhibit G

John William Bocquet



### PUBLIC INFORMATION SOURCE

#### Wiki Contribution Hub

John William Bocquet: The True Son of Dudley T. Dougherty, Beeville, TX:

DOB: Redacted

Wiki is a collaboratively-sourced, web-based collaborative platform that enables users to create, edit, and modify content in an organized manner with regard to (Dougherty). There is additional regard to Rockin' M employee Kolten Motes, and devastation of property at 11220 Indian Trail Helotes, TX, for the personal gain.

Information represented here to date, from participants, county and district courts in the U.S. (and pending satisfaction of multiple remaining open records requests), illustrate the strong distinction that Mr. Bocquet's "business", as he referred to his practice, is morally ambiguous, and those that participate are subject to great financial loss.

The reason John Bocquet (Dougherty) sought to destroy multiple real property he does not have interest in stems from the actions of his father, Dudley T. Dougherty. He comes from a line of family that prey on rural populations in times of hardship. The acts are entirely intentional, especially with distinct, prior knowledge of said hardship or immanent financial default. The actions and services, whether desired or not, were rendered - even forced - and recipients are penalized for failing to see through the scheming until it is too late.

Mr. Bocquet refuses to contribute to this wiki, correspond over the phone, text or even encrypted Signal transmission - and is often "blocked" as mentioned in previous conversation.

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Rockin' M business owner Kolten Motes, managed by John Bocquet (Dougherty), bulldozed across 144 acres in absolute trespass along Texas State Park property. The once wooded forests were sanctuary to wildlife. Officials in the neighboring state park are very much willing to assist to make recompense to the rightful inhabitants for loss and injury.

Along the entire fence line shared with Government Canyon State Park, the destruction of old and timeless Oak trees, rock formations, and beautiful views cannot be undone. The ground is not only soured, it is now fully exposed and vulnerable to the Oak Wilt infestation, as evidenced on the neighboring properties.

Kolten Motes, with wife, Taylor Baliff, were discovered firing high-powered rifles into the state park, towards its visitors and also the homes in Helotes Ranch Acres neighborhood. This put state park attendees and direct neighbors in danger. When informed of trespass on private property, there was mention that said notification "created a predicament." (see



video below)

As an act of revenge, John Bocquet (Dougherty) gave authorization to Rockin' M business owner Kolten Motes to devastate the land. This was without regard for the its Specific Use, the generations of family's use, and property rights of the owners. John Bocquet (Dougherty) purposely diminished the value of the property as an act of revenge and to devalue the land for his own purpose.

On discovery of said destruction in progress, John Bocquet (Dougherty) and Kolten Motes immediately attempted to flee the scene. John Bocquet (Dougherty) struck another man in the video with his vehicle and then abandoned Kolten Motes entirely, in attempts to flee from the sheriff. Kolten Motes, too obese to flee in a timely manner, was on site when the Bexar County sheriff arrived. Mr. Bocquet returned later in the evening.

The land owners, where forest was, now have a (60') wide graded swath of destruction through an (144) acre plat with four (proposed) plots along the fence shared with the state park.

It should be noted that all stakeholders, maintain undivided interest over the entire (144) acres and John Bocquet (Dougherty) is not a stakeholder, landowner, or a family member.

These videos exemplify a small part of the larger devastation along the bordering fence with a State Park and across (11) landowners' legacies.

(Opinion) All that John Bocquet (Dougherty) has destroyed was once a beautiful place, experienced and maintained by four generations of family. It is truly unfortunate there is not a machine in existence that can un-bulldoze said destruction. Perhaps he thought he would rent the wildlife sanctuary to hunters? Perhaps he thought he would make money by destroying and devaluing land? It is truly a mystery what dunderheaded ignorance was driving these acts.



## It's a perfect combination

A young Kellen Motes enjoyed playing in the dirt like most young boys do. That didn't change as he got older. As a teenager, when Kellen was big enough to operate a tractor, it wasn't unusual to see him on a big heavy piece of equipment, pushing dirt around. One could say he can thank his mother for that as she had a small dirt company and he wasn't afraid to get out there and play on life-size version of his childhood toys.

"Since I was little, I have liked playing on big yellow tractors and I got good at it. I still think it is a lot of fun so if I can make money in the process it's just the perfect combination."

"I always knew I want to start up my own company. That has always been my goal," says Motes. "I want to work for the pipeline or oilfield, whatever term you want to use, to earn enough capital to buy my own equipment and start my own company."

Motes started **Rocking M Contractors** in September of 2020, specializing in excavation and site development. "We have some pretty cool equipment. We can dig through rock, which is pretty neat, especially in this area," adds Motes.

When Motes and his partner, **John Bocquet**, started Rocking M, it was just Motes and his fiancée, **Taylor Balitt**, before bringing on **Jacob Chapia**.

While Rocking M is currently busy in the residential sector, they are excited to get into bigger projects doing something different, something outside of the residential realm. Their coverage area is primarily from San Antonio to Austin and their surrounding areas. "Our services include site clearing, excavation, site development, site prep, grading, but we excel in rock excavation," says Motes. "I'm



L.R. Taylor and Kellen

looking forward to getting into commercial work. I just have to be at the right place at the right time with the right people. I think is what it all boils down to. I have every financial resource that I could possibly need to grow the business as far as equipment is concerned."

"I have some really good people who take care of whatever needs to be done and I have people who have been really good to me. HoltCAT has been pretty helpful throughout this whole deal. They take care of me."

Since the company's humble beginnings in late 2020, Rocking M has tripled in size with seven employees and six pieces of heavy equipment. Photos courtesy of Mary C. Hoskin Photography.

Rocking M Contractors is an excavation contractor. -cmw

## John Bocquet (Dougherty), Bastard Son & Excrement of Extra-Marital Affair

**Birthright: John Bocquet (Dougherty)'s DNA will indicate he is the son of a Dudley T. Dougherty of Beeville, TX and is not true family of Bocquet & Beechie - in name only.**

**The extra-marital affair and activity between Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty was disclosed during a meeting at Beeville Country Club.**

**Myrtle McKinney Rosebrock (grandmother), was in attendance with Myrtle Nell Rosebrock Bocquet and Dudley T. Dougherty. The option of divorce from Robert Bocquet was strongly forbidden.**

**Two siblings, Johnye Jamison and Jane Pugh Jamison, not in attendance at the meeting and informed of the extra-marital affair, counseled Myrtle Nell Rosebrock Bocquet on the importance of staying married to Robert Bocquet for the sake of the child, and to honor the Catholic church doctrine.**



There was no love between Myrtle Nell Rosebrock Bocquet and Robert Bocquet. In fact, Myrtle Nell Rosebrock Bocquet did not share a bedroom with her husband. She instead slept upstairs in her bastard son's room.

John Bocquet (Dougherty) does share the name of a single, deceased member of the family, but the land is in trust and belongs to his mommy.



## John Bocquet (Dougherty), Personal Gain & Financial Consequence to Others

John Bocquet (Dougherty) is person that makes his way through life through litigation: against his only sibling (sister), his former employers, and his aunt.

1. John Bocquet (Dougherty) gun-whipped his father and had Robert Bocquet jailed to expedite his potential inheritance, and acquisition of land, farming equipment, and his father's life-long accomplishments and wealth.

2. Johnye Rosebrock Jamison and Jane Rose Brock Pugh accepted a call from Myrtle Nell Rosebrock Bocquet admitting to and confirming the current and past (all) abuse against Robert Bocquet from her and her son. Before the death of Myrtle McKinney Rosebrock (grandmother), John Bocquet (Dougherty) conned her for \$30,000. His mother, Myrtle Nell Rosebrock Bocquet, protected him, concealed the theft, and earned a lesser inheritance than her seven other siblings, as a result.



3. John Bocquet (Dougherty) filed suit against his sister, (John Bocquet vs Laura Bocquet). Laura Bocquet's children were also named in the suit. He sought full control of their goats.

4. John Bocquet (Dougherty) was employed with a [motorhome rental company], and was sued by his employer for theft.

5. John Bocquet (Dougherty) conned and collected money from those that trusted him, along with family members - many thousands of dollars. When the RV company hoax was uncovered, he swindled the same persons again for the legal authority to fight on their behalf, resulting in an even greater financial scheme to defraud.

6. John Bocquet (Dougherty) verbally and physically abused his ex-wife and step daughter [disturbing detail omitted]

7. John Bocquet (Dougherty) fired a high-powered rifle on children exploring a neighboring property he had recently acquired through financial default and auction. (The previous owners were unable hold on to the property in times of hardship with the county. John took it upon himself to ensure the county was notified in a timely manner and did all in his power to win at auction) Police were later called to his residence after he was reported to have fired multiple rounds towards children on the property. (pending receipt of open records)

8. [Anonymous Submission] John Bocquet (Dougherty) - Riverfront property, inherited through deceased family member, was split into sections. [Anonymous] was hired to bulldoze and clear along property lines for the purpose of local leasing to hunters. [Anonymous] performed the action, while John Bocquet was out of country. The bulldozing of property was not agreed upon between landowners (family members) prior to leaving the country. Claims for the work performed went ignored, and were met shortly after with threats of litigation from John Bocquet (Dougherty). [Anonymous] almost went bankrupt from the amount of clearing performed, resources used in the process, and duration of work.

9. Robert Bocquet, illegitimate father of John Bocquet (Dougherty) - (name only) - placed his niece as executor of his granddaughters' college funds. Complete control of the funds by a family member outside of the immediate household was necessary, due to the greed and extreme desire for his estate and wealth. John's mother and son filed suit against "niece" for control of said assets. Represented by Bethune I Enright, Bar Card Number: 24082964, 117 N Washington St. Beeville, TX 78102-4508, the case was entirely squandered in favor of the Bocquets. Jonathan Enright has yet to respond to email inquiries sent May 11th & 16th, 2022.

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Such behavior, and lack of integrity, exemplifies the character of John Bocquet (Dougherty), and further preveated any sort of trust from Robert Bocquet and financial matters.

(Opinion) Beeville is a small town with great influence by certain parties on legal matters. Whether this firm chose to willingly act outside of the highest degree of loyalty and honesty in their fiduciary duty parties outside of the Bocquet family remains to be determined.

(Opinion) John Bocquet (Dougherty) is perceived as a freeloader and fodder without use by his family.

(Opinion) As exemplified with decisions in the following videos, John Bocquet (Dougherty) maintaias the perception of an obsequious, parasitic wealth-seeking leech.



## Destruction of Family Land & Rockin' M Operators Firing Guns into a State Park

John Bocquet & Rockin' M (Kolten Motes) - Illegal Bulldozin...



Unlawful Clearing of Private Land - Assault & Injury by Vehi...



Rockin' M Owner - Kolten Motes - Unlawful Land Clearing - ...





Have a wiki contribution to JohnBocquet.com? If John Bocquet (Dougherty) has wronged you, stolen from, or burdened you with his own incapacities. Please contact

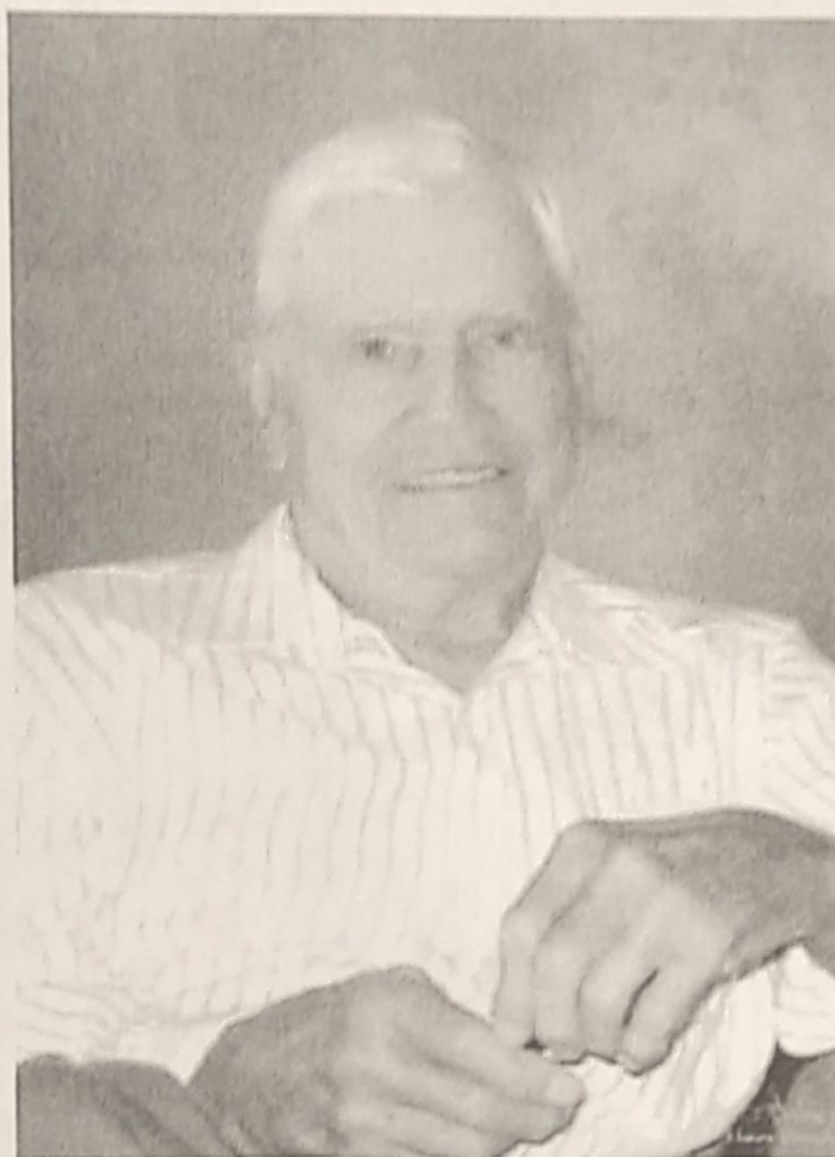
[johnbocquet@idtrackthat.com](mailto:johnbocquet@idtrackthat.com)



**Robert Bocquet (Deceased):** This picture was taken before being gun-whipped and attempting to protect himself from the abuse from the hands of John Bocquet (Dougherty).



**Exhibit H**







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## Exhibit I

439 views Premiered May 7, 2022

Video from after John Bocquet's unlawful bulldozing family land &amp; the bordering Government Canyon State Park.

John Bocquet is not a landowner, simply a track-loader operator and furniture salesman. The sudden idea to take advantage of Kolten Motes of Rockin' M for the use of a track loader, and clear a 60' swath across (11) different owners' property with undivided interest....one will never understand.

This video exemplifies only part of a great abundance of devastation, along a bordering fence with a Park.

All that is now destroyed, was once a beautiful place. It was once experienced by my family, personally my entire life, and my son's experience in the same. Unfortunately the land cannot be un-bulldozed.

This man is not family. This family does not do these things. We are upright and honest. We do not pistol-whip our fathers, or pander to our mothers for money. We are a family that works hard for our accomplishments. We do not sue or throttle our loved ones, or steal their accomplishments.

John Bocquet has never maintained a job, a relationship or was the recipient of much fondness or esteem from family, because he's a freeloader...and perceived as fodder without use.

The "survey" in mention, appraisal, and all other legal documentation already assembled to allow for divided interest, perhaps for John Bocquet to someday own this land, were accomplished and paid for prior to his destructive return to the ranch.

As exemplified with decisions like this he continues to fit the mould, and perception. As they say: "He's not the sharpest tool in the shed"

If John Bocquet has wronged you, stolen from you, or burdened you with his incapacities. Please use contact information on JohnBocquet.com to get in touch (You can also leave comment here)

This is not the first time he's displayed such idiocy. The hope is that we don't discover him living in the 50yo dilapidated shanty house, hording wallpaper peeling in water jugs (again).

### Transcript

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Denise Omstead on behalf of Matthew Countryman

Bar No. 24069540

domstead@jrl-law.com

Envelope ID: 87436368

Filing Code Description: Petition

Filing Description:

Status as of 5/7/2024 8:11 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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