

Kristen Boehler

CAUSE NO.: 73540

IN THE INTEREST OF

A.G.F.W.,

A MINOR CHILD.

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IN THE 6<sup>th</sup> JUDICIAL

DISTRICT COURT OF

LAMAR COUNTY, TEXAS

### **Notice of Federal *Younger* Doctrine Alert**

Comes now Rustin P. Wright, noticing the Court and all parties of giving this formal federal *Younger* doctrine alert, as to any and all federal questions raised within these proceedings that still lack proper resolution in compliance with constitutional rights, written law, and established due process, providing fair and reasonable final opportunity for the instant Texas state court and all involved persons to now fully comply with all aspects of federal law herein, by stating thusly:

As thoroughly detailed by the undersigned's previous arguments, testimonies, and exhibits as offered in this case, the matters in question have been so utterly defective and grossly inadequate as to deprive myself and my minor child of even the very most basic precepts in the well established course and due process of American jurisprudence and law. In particular, the sheer amount of ongoing bias, prejudice, and outrageous fraud within this case, perpetrated by Ashley, Ms. Gibo, and Mr. Baird, as well as other Lamar County judges before him, in order to actually conspire in, aid, abet, assist, conceal and cover-up repeated and continual acts of knowingly baseless and lawless acts in clear defiance of already presented law, rules, and even agreements mutually executed prior, is not only grossly disdainful in ghastly ruse against society's standards, and not only solid proof of willful violations of professional ethics rules, but is, indeed, criminal, amongst many other very serious issues herein, not to even mention that, also clearly, neither the current or prior judges of this court, nor Ms. Gibo, have yet obeyed *any* of their own absolute

professional ethics duties, mandated by clear rules, to \*promptly report\* *any* of the grievous misconduct acts described above, nor *any* of the additional acts of misconduct perpetrated herein.

In such a case, the federal court system will not abstain from hearing and enjoining those same unlawful practices under either the *Younger* doctrine (e.g., see *Younger v. Harris*, 401 U.S. 37 (1971), and its progeny), or the doctrines normally requiring exhaustion of administrative remedies before applying for a federal injunction to swiftly address flagrant rights violations.

Title 28 U.S.C. § 2283, the anti-injunction statute, prohibits federal courts from enjoining state court proceedings, but the statute excepts from the scope of that prohibition any injunctions which are “expressly authorized” by another Act of Congress. The United States Supreme Court has previously determined that actions brought under the Civil Rights Act of 1871, 42 U.S.C. § 1983, are well within the “expressly authorized” exception to the ban on federal injunctions. *Mitchum v. Foster*, 407 U.S. 225 (1972).

By giving this formal written notice of the flagrant rights violations at play in this case, and by giving the required formal final opportunity for the state court system to now correct those same violations of basic, well established due process, the federal courts are free and clear to address the same matters if this state court system continues to display itself unwilling to do so.

**WHEREFORE**, the undersigned now provides the above required notice and alert, and all other parties, persons and entities herein are deemed duly advised upon any related participation.

Respectfully submitted,



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Rustin P. Wright  
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CERTIFICATE OF SERVICE

I hereby certify: that on this \_\_3rd\_\_ day of June 2018, a true and complete copy of the foregoing *Notice of Federal Younger Doctrine Alert*, by depositing same via first class postage prepaid United States Postal Service mail, and via email, has been duly served on the following:

*(Petitioner herein)*

Ashley B. Womack  
125 Ellis Creek Drive  
Weatherford, TX 76085-1631

*(counsel for Petitioner)*

Jennifer M. Gibo, #24032343  
Law Office of Jennifer Gibo  
109 1st Street SE  
Paris, TX 75460



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Rustin P. Wright