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**ACTUAL DETAILS OF COMPLAINT
AGAINST NATHAN HECHT
JULY 4, 2021**

On March 17, 2011 a Dallas Probate Attorney, David Pyke revised my brother Robert Kam's active irrevocable Trust to increase the benefits and add the children of his client, my brother's girl friend at the time. This was 10 days prior to my brother's passing from a long term battle with pancreatic Cancer. At the time of this scam, my brother Robert had completely lost Kidney function, had only partial liver function, was on enough pain killing narcotics to kill a horse, had a documented blood pressure reading of 63 /43, was totally blind in one eye from glaucoma, wore a coke bottle lens to create limited sight in his remaining eye and had no idea what planet he was on. He died 10 days later while be loaded into a car to go to dialysis. His absence of capacity was confirmed in the Courtroom by the medical records, an M.D. Anderson Oncologist and multiple eyewitnesses.

No heir was notified of the girlfriend's change to the Trust until the funeral. One of my brother's sons filed suit to have the original, active, irrevocable Trust enforced as that is what his father promised him. My sister, Carol Kam joined the suit as the Attorney David Pyke instructed the Trustee to not pay her inheritance of \$10,000 as she became vocal of Pyke's complete incompetence, ineptitude and unprofessional conduct as she researched what he had illegally done.

A trial was set for July, 2013 in order to accommodate the schedule of the Dallas Probate Judge Michael

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Miller. Seven days prior to the trial, a pre trial meeting was held with Miller and the two attorneys. This was limited to normal trial procedures and was not remarkable. Upon conclusion of the meeting, my sister and Nephew's attorney left Miller's office. The Defendant's attorney remained and a deal was cut to have the Judge of Record bow out and Dallas Probate associate Judge John Peyton Jr over see the case so that all misconduct of David Pyke was covered and my Nephew and sister would be destroyed. My sister and Nephew's Attorney received notice from the defense attorney of the change in Judge one hour after the meeting. Their attorney never received any notification from the Judge / Court of the change and obviously not made aware of the deal. No Motion of Recusal was or Order of Referral was created prior to trial.

The Associate Judge, Peyton Jr, showed up in the courtroom at the time of trial and after three days of testimony, which confirmed the rightfull inheritance of my Nephew and sister and completely exposed the ineptitude, incompetence, and misconduct of David Pyke and the illegality of the amendments to an active, irrevocable trust, Peyton Jr issued an Order removing my Nephew and sister from the Estate and charged each with \$226,000 of legal fees.

My sister and Nephew's attorney requested a rehearing with the judge of record, Miller, who agreed to the rehearing with his attendance. The Judge of Record failed to show at the scheduled rehearing and Peyton Jr showed up without an order of Referral. Peyton Jr. denied the rehearing and also denied the deposition of

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a Pediatrician [Doctor Robert Beard] who illegally signed a DNR [Do Not Resuscitate Form] who Pyke claimed was in his office at the time that Robert allegedly signed the illegal Amendment to the original Active irrevocable Trust and who could confirm Capacity. Both of Pyke's paralegals, who signed as witnesses to the Pediatrician's Signature at the request of Pyke, confirmed that they never saw the doctor ever in Pyke's office and could not confirm his signature as they never saw it executed. David Pyke is a consummate slime ball and a B. S. [Beyond Stupid] attorney.

The Judge of Record never signed the two Peyton Jr. Orders as required by Texas Law as this was part of the ex parte deal cut so that the Miller, who was running for re election, would theoretically be separated from the scam.

My sister attempted to rectify all the misconduct thru a Bill of Review in 2015 where the Dallas Probate Judge Margaret Jones Johnson took her attorney's entire file without logging it as evidence, ruled against my sister, failed to notify her attorney of the ruling, and failed to provide Findings of Fact, as required by State Law.

It took my sister 7 years and hundreds of thousand of Dollars and numerous Court hearings to finally get the Dallas Appeal Court to recognize that the Peyton Jr Orders, which remained unsigned by the Court of Record, were in fact illegal and incomplete, invalid orders and because of the 7 year passing, could ever be made legal. At this time, Margaret Jones Johnson also

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admitted in writing that the Peyton Jr Orders were illegal, incomplete, invalid Orders without the court's sign off. My sister was always correct that the conduct of Miller, Peyton Jr. and Margaret Jones Johnson was illegal and unprofessional.

My sister is currently seeking monetary relief for the Probate Court misconduct thru the Federal Court system. This is currently being hampered by State Representative Jeff Leach's unexplained cover for misconduct by Attorney General Ken Paxton. Let's hope that Jeff Leach realizes that covering for Ken Paxton will become the Kiss of Death for his political career.

I submitted over two hundred pages to this commission in late 2013 fully documenting all the illegality and violations of Code of Conduct by multiple Judges from the Dallas Probate Court Cess Pool including Peyton Jr. and Miller, who was subsequently killed in a mysterious scooter accident on Abrams Road in Dallas shortly after he lost re-election. While my submittal was accurate and complete, I never heard a word from your organization requesting any clarification or commentary to my comprehensive submittal. I never received any rebuttal of any supporting document or argument I submitted. I am not aware if Miller and Peyton Jr were ever notified of the complaint to the Commission. I not aware of and never received a copy of any response by Miller or Peyton Jr. I am not aware if they were ever asked to respond or if they did respond. I was never made aware of any hearing and I can only assume that no hearing was ever conducted on the matter. After 1 year after I filed the complaint,

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I received letter from your staff claiming they found no problem with the fully documented improper and illegal conduct of former Judges Miller and Peyton Jr.. The correspondence made no reference to and deny the validity or accuracy of any part of my submittal. I can only assume that you did not review or evaluate my submittal.

Approximately one year after this Commission condoned the illegal and inappropriate Conduct of Miller and Peyton Jr., a 14 page D Magazine article came out documenting Peyton Jr's affair with a Dallas Probate Attorney during a trial in which Peyton Jr made favorable rulings to the attorney's client.

Within one year after this article came out, you removed Peyton Jr as a Judge as you deemed him to be incompetent. The magazine article was noted in the Commission's response as a reason for the removal. Dallas County then prompted Peyton Jr to be the Director of the Dallas Probate Court Cess Pool after his removal as a Judge.

One can not make this stuff up *where, in some perverted thought process, the Dallas County Commissioner's Court actually appointed and paid for a "Giant Turd to sit on a Pile of Shit"*. I feel confident some money was transferred under the table as part of this deal.

The loosing party from the "affair case" filed a Bill of Review. This was submitted to the Dallas Appeal Court as a simple single issue case citing Peyton Jr's "appearance" of misconduct as described in the D magazine

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article as grounds to void the Probate Court Ruling. There were no other legal issues brought up or needed that would complicate the request. The Dallas Appeal Court Panel, led by Robert Fillmore*, sat on this case for 95 weeks without a decision. I wrote a letter to each State legislator and Senator noting the Dallas Appeal Court's cover for Peyton Jr, and within one week of my letter, the Dallas Appeal Court, in a very brief opinion, affirmed that the conduct did provide the "appearance" of misconduct". To say that the Dallas Appeal Court did not provide 96 weeks of artificial Cover for Peyton Jr is an understatement. After the ruling, Dallas County fired Peyton Jr. as "Director of the Dallas Probate Court" after a second scathing article by D magazine.

18 months Ago I formally filed a complaint on Margaret Jones Johnson citing and fully documenting all her illegal and inappropriate handling of my sister's Case. I have supplemented my original complaint with additional fully documented information as it developed. This includes written documentation by Margaret Jones Johnson admitting that she ruled against my sister in a hearing 5 years earlier solely to protect the gross misconduct of Pyke and Peyton Jr.. While she admitted her illegal and improper action, she made no offer of apology to my sister for her complete misconduct and un professional behavior.

** Robert Fillmore is also frequently referred by some individuals as "Fruit of the Loom Fillmore" for his*

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historic Cover for “asinine” misconduct from the Dallas Probate Court Cess Pool.

Margaret Jones Johnson is a complete scumbag of the highest order and completely in her natural environment in the Dallas Probate Court Cesspool.

I have not received any notice that Margaret Jones Johnson has ever been notified of the complaint or has responded to the Commission. I am not aware of any scheduled hearing on any review of my submittal and the fully documented misconduct of Margaret Jones Johnson. To date, I have not received any status report on the 18 month old complaint to the Commission. I can only assume the the Commission is awaiting a public article on the ineptitude, incompetence, and inappropriate conduct of Margaret Jones Johnson to justify her long over due removal.

Margaret Jones Johnson is frequently voted by the bar as one of the most incompetent Judges in Dallas County. She has cost Dallas Familes millions of dollars in litigation expenses required to correct her “stupid and illogical rulings”. Your delay in removing her from office is a sad commentary of the lack of effectiveness of your organization to serve Texas Families and maintain a high Quality professional legal system.

While working thru all of this with my family, I certainly became aware of the outright Fraud in the Court system but also was astonished at the archaic organization and adminstration of Probate Law in the State of Texas. Even more so, was the complete absence by

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the State of Texas and the Probate system to improve itself. It was a trip back in time to the 1890's.

As my sister's cases received some notoriety, I have had other families approach me with their nightmares related to Probate Attorneys and Judges. One can go to the internet and pull down two hundred Will and Trusts. One can go to books and get dozens of Wills and Trusts. One can go to 2,000 attorney offices in the State of Texas and each will have their own "hand made" Will / Trust to fill out. With no standard, every single Will and Trust by any party, even if created by an attorney, in this State is theoretically contestable. This makes every estate "fair game" for Probate Attorneys and Judges. Because of this uncertainty and costs, even if created by an Attorney, "**millions**" of Texas Families do not have a will or Trust to pass on an estate.

One can go to the Texas Real Estate Commission and pull down dozens of standard contract forms for multiple types of Real Estate Transactions with full confidence that, whether it is a \$10,000 lot or a \$100,000,000 commercial building, one can safely and easily fill out the pertinent information and take the contract to a title company with 99.0% certainty and confidence that the deal will close that is acceptable and understandable to all parties.

In 2014, I went to my Austin Representative at the time, Paul Workman and he quickly acknowledged the problem. He and I created a law that would provide standard Wills, Trusts and Probate Forms on a State website that could handle the needs of 90% of Texas

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families. In addition, and more importantly, this would be a no cost item that would greatly reduce the amount of estates without a will or trust and significantly reduce the State's expense and cost of maintaining Probate Courts and in the case of Dallas, a full Cess pool..

This was was submitted to "Legislative Counsel" in late 2014 and they responded that the great Senfronia Thompson and the equally magnificent Judith Zaffirini had already submitted a virtually identical Bill [SB 512, 2015 legislative session]. The only difference was that the Workman Bill had the Secretery of State handling the forms, which they had agreed to do, and SB 512 had the Supreme Court publishing the forms on their website. At this time, we saw no problem with the Supreme Court as during the Senate Hearing, **Supreme Court Justice Eva Guzman was a gung-ho supporter and expressed an extremely urgent need for the immediate creation of the forms as the State had a critical "Gap in Access to Justice " that was destroying Texas Families everyday.** The Zaffirini Bill, SB 512, passed by almost unanimous vote in the House and Senate and in May 2015, the governor signed it in June 2015. **It went into FULL EFFECT IN SEPTEMBER 2015.**

I have since learned that there was never a need for a Legislative Bill as the Bar, the State Probate Judge and / or the Texas Supreme Court court, with leadership, could have published the Forms for Texas Citizens on their own with out legislative authority. The legislature was simply stepping in to address the failure of the State Probate Judge, the State Bar, and the

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State Supreme Court to provide what is best for Texas families.

Wills and Trust for wealthy people can and are complicated as they incorporate many devices to avoid taxes in addition to transfer of property. These people already have Attorneys and Accountants on staff to handle this. They would have no need or use for a Standard Form to simply transfer property.

A legal Will in Texas to simply transfer assets, to designated heirs, with a designated Executor, is extremely simple. It is far less complicated than even the simplest Real Estate transactions which are currently handled extremely efficiently at no cost to Texans with T.R.E.C. [Texas Real Estate Commission] Forms.

Two smart Probate Attorneys and an honest Probate Judge could have developed all the forms required by the State Law within a Week. These Forms could have and should have been published by October 1, 2015. There are smart probate attorneys and, while not in Dallas County, there should be at least one honest Probate Judge in Texas.

Nathan Hecht's abysmal failure to have the forms up by October 2015 can only be explained by his complete incompetence and / or complete disregard for Texas Families and ***Eva Guzman's public acknowledgement of the growing "Gap in Access to Justice" for Texas Families***. The Hecht did set up a committee in Jan 2016 to study the forms and report back in Dec. 2016 which they did with no resolution by Hecht. Another hearing was set up and overseen by Hecht in

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June 2019 to review a set of proposed Forms with no action by Hecht.

I am not aware of any future hearings planned by Hecht on the Forms.

Senfronia Thompson had mentioned that the goal was to have forms up so low income people could create proper, no cost, wills to insure the ***maximum transfer of wealth thru low income families***. Judith Zaffirini mentioned that low income Hispanic familes encountered the same issue compounded with corrupt border attorneys stealing from cross border estate transfers.

Hecht can call any attorney in Texas and he or she will get him a will in just a few moments. For Nathan Hecht to arrogantly hold up on creating a service that could have greatly benefited all low income Texas families and most middle class Texas Families for the past 6 years is certainly a complete deriliction of duty and would be a crime if done by an “average” person.

I will send this complaint to the Texas Attorney General and the Texas Rangers to see if they will enforce SB512, arrest and prosecute Hecht.

I am sure that Hecht will initally repond with a litany of excuses. When he sees eyes rolling he will quickly go on the apology tour. ***He needs to be guided to the exit door.***

SB 512 is not a “suggestion” but a law. For a Justice of the Supreme Court to not implement a law than does not require rocket science and is much simpler than any real estate form with access to unlimited resources

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of talent and money represents a complete failure than can only be explained by his incompetence or / and or his complete disrespect for the law. Hecht's immediate removal from office would instantly notify all Texans that no one is above the law, especially the chief Justice authorized to respect the Law. Any delay in the immediate removal or immediate suspension of Nathan Hecht as Chief Justice sends a strong message to the citizens of this state that their instincts are correct; there are in fact two systems of justice. One for you and I and another for them ..at their sole discretion.

I am well aware of the Commission's historic notoriety of secrecy, deal cutting, favors made, and selective discipline. As a result over the next month, I will be furnishing this complaint to approximately 200 news organizations in the state. I feel confident that more than one will initiate an investigation and author an article documenting that we have two distinct legal systems in this state. I trust that First article will create an immediate suspension of Nathan Hetch and the third or fourth will result in his removal.

I also suspect that Mr Hecht will quickly publish something on the Supreme Court website this July that should have been published in 2015. I can guarantee it will not be the quality it could or should be.

This commission has a Black and White issue.

In 2015, all three branches of Texas Government, the Legislature, the Governor, and the Judicial Branch [via Eva Guzman's sworn Testimony] all agreed on a law which involves an extremely simple effort that could

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have benefited millions of Texans over the last six years that was intentionally blocked by an individual who unilaterally deemed himself to be outside the law.

How many millions of dollars have been squandered and cheated out of Texas Families in the Texas Probate Court system due to absence of the forms over the last 6 years? How much money has the State of Texas spent maintaining un needed Probate Courts?

There are tens of thousands of people in Texas jails at this time who have not done this much intentional financial harm to an individual or society as Hecht has done to Texas Families over the past 6 years.

If Hecht goes free without any consequences for the Financial loss to Texas Families, the state has set a new standard for Justice that I can see argued in any court for generations to come related to a financial loss.

Texas has two distinct legal systems.
