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Via Email: dalcdcreponses@texasbar.com

Mr. Kenneth W. Kirkland
Office of the Chief Disciplinary Counsel
The Princeton Building
14651 Dallas Parkway, Suite 925
Dallas, Texas 75254

Re: 202202193 – Joseph Allen Maldonado-Passage – Francisco Hernandez,
Jr. – Confidential Proceeding

Dear Mr. Kirkland:

I represent Francisco Hernandez. Mr. Hernandez is Board Certified in Criminal Law by the Texas Board of Legal Specialization (since 2003) and has practiced in Tarrant County for over 32 years. Mr. Hernandez served as Chairman of the Texas Ethics Commission, appointed by Governor Rick Perry in 2001 and was elected Chairman in 2005. Former-Mayor Mike Moncrief appointed Mr. Hernandez to the Fort Worth Ethics Review Commission in 2010 where he served until 2014. Mr. Hernandez also served on the DFW International Airport Board of Directors from 2006 through 2015, serving as Chairman in 2011. Besides the above appointments, Mr. Hernandez has received numerous awards and recognition for his community involvement.

The grievance against Mr. Hernandez appears to have been submitted on behalf of Joseph Maldonado-Passage, a.k.a. the “Tiger King” from the Netflix documentary of the same name, by his purported power-of-attorney, Tamara Springer.¹ Mr. Maldonado-Passage is incarcerated in federal prison after being

¹ Ms. Springer may rely on a document titled “North Carolina Power of Attorney,” dated December 1, 2021, purporting to give Ms. Springer power-of-attorney over Mr. Maldonado-Passage. [Ex. 1]. However, under North Carolina law, the power of attorney must be signed and acknowledged by the principal (Mr. Maldonado-

convicted for a murder-for-hire attempt on a business rival, Carole Baskin, killing five tigers, selling tiger cubs, and falsifying wildlife records.

Mr. Hernandez was hired by Mr. Maldonado-Passage's former power-of-attorney, Anne Patrick,² in April 2020 to assist with a motion to set aside Mr. Maldonado-Passage's sentence and a pardon application to then-President Donald Trump. The grievance admits that ***Mr. Hernandez received no money from Mr. Maldonado-Passage.*** Mr. Hernandez ceased representing Mr. Maldonado-Passage in November 2021, shortly after Mr. Maldonado-Passage retained new counsel, John Phillips, to assist Brandon Sample, another attorney, with appealing Mr. Maldonado-Passage's conviction and civil lawsuits against various individuals. [*See Exs. 13, 16*].

The information sheet submitted along with the grievance contains numerous inaccuracies and falsities:

1. The grievance is purportedly filed by "Mr./Ms. Joseph Maldonado-Passage." As explained above, it appears that the grievance was submitted by Ms. Springer since Mr. Maldonado-Passage is currently incarcerated. And, there is no "Ms. Maldonado-Passage."—Mr. Maldonado-Passage is legally married to Mr. Dillon

Passage). N.C. Gen. Stat. §32C-1-105 (West 2021). The principal's signature is presumed to be genuine if the principal acknowledges the signature before a notary public. *Id.* Mr. Maldonado-Passage's signature on the power of attorney is not properly acknowledged and therefore fails to give any authority to Ms. Springer. Additionally, the power of attorney does not authorize Ms. Springer to file this grievance against Mr. Hernandez. *See id.*, at §32C-2-212 (list of "claims and litigation" under control of power-of-attorney does not include grievance proceedings).

² Ms. Patrick served as Mr. Maldonado-Passage's power-of-attorney from some time in 2020 through November 2021. Upon information and belief, Ms. Patrick was removed as power of attorney around the same time Mr. Hernandez ceased representing Mr. Maldonado-Passage. [*See Ex. 2*].

Passage. Ms. Springer does not purport to have power-of-attorney for Dillon Passage;³

2. The contact information listed for Mr. Maldonado-Passage, including address, phone number, and email address, is all for Ms. Springer; and
3. Mr. Hernandez was hired in April 2020, not March 2020, by Mr. Maldonado-Passage's former power-of-attorney, Anne Patrick, to work on Mr. Maldonado-Passage's post-conviction motion to set aside his sentence and his pardon application, not for the direct appeal of his conviction.⁴

The narrative grievance also contains false statements about Mr. Hernandez's representation of Mr. Maldonado-Passage, his interactions with Dillon Passage, and handling of Mr. Maldonado-Passage's IOLTA account, each of which are addressed below. Additionally, the grievance asks the Chief Disciplinary Counsel to return Mr. Maldonado-Passage's "car of \$33,000 to cover the lien and the \$10,000 in cash [Mr. Hernandez] hid in his law firm trust account." The grievance system cannot provide this requested relief.⁵

³ Mr. Maldonado-Passage filed for divorce from Dillon Passage in Santa Rosa County, Florida in March 2022.

⁴ At Mr. Maldonado-Passage's request and insistence, Mr. Brandon Sample handled the direct appeal briefing and all decisions concerning any briefing issues. Mr. John Phillips later took over that role, although both attorneys remain counsel of record for the direct appeal for all purposes.

⁵ State Bar of Texas "File a Grievance" https://www.texasbar.com/Content/NavigationMenu/ForThePublic/ProblemwithanAttorney/GrievanceEthicsInfo1/File_a_Grievance.htm (last visited June 8, 2022) ("The State Bar of Texas' attorney grievance system cannot act as a liaison between you and the lawyer, nor can it award damages... [or] substitute for civil or criminal remedies."). Additionally, Mr. Phillips has threatened litigation against Mr. Hernandez related to these same allegations.

While representing Mr. Maldonado-Passage, Mr. Hernandez did not engage in self-dealing or self-promotion or mishandle IOLTA funds. The underlying facts and Mr. Hernandez's responses to the specific complaints will show that Mr. Hernandez did not violate any Texas Disciplinary Rules of Professional Conduct, and Mr. Hernandez's actions do not support a determination of Just Cause as defined in the Texas Rules of Disciplinary Procedure.

I. Background

After Mr. Maldonado-Passage was convicted of murder-for-hire, killing and selling tigers, and falsifying wildlife records in January 2020, Mr. Maldonado-Passage's power-of-attorney, Anne Patrick worked to find an attorney to assist—for free—with Mr. Maldonado-Passage's motion to set aside his sentence and a pardon application to then-President Donald Trump. Mr. Maldonado-Passage first sent Ms. Patrick the name of Eric Love, a self-described "Texas philanthropist and private investigator,"⁶ who first contacted Mr. Hernandez on behalf of Ms. Patrick. [Ex. 3, p. 1]. In April 2020, Mr. Hernandez agreed to help represent Mr. Maldonado-Passage *for free* related to the motion to set aside his sentence and pardon application. Shortly thereafter, Mr. Hernandez set up an IOLTA account to handle funds on behalf of Mr. Maldonado-Passage. Frequently, Mr. Maldonado-Passage or Ms. Patrick would direct Mr. Hernandez to transfer money from the IOLTA to Dillon Passage (Mr. Maldonado-Passage's current spouse) for living expenses, to Ms. Patrick to pay for bills and expenses, and other persons working on behalf of Mr. Maldonado-Passage.

Until January 2021, Mr. Hernandez worked tirelessly on Mr. Maldonado-Passage's campaign for a pardon, including writing the application itself, publicizing Mr. Maldonado-Passage's wrongful conviction to the public, and communicating with President Trump's advisors. Mr. Maldonado-Passage encouraged Mr. Hernandez and others working on the pardon to hold press conferences and increase the social media presence. On four occasions, Mr. Maldonado-Passage asked Mr. Hernandez to travel to Washington D.C. for press conferences, to deliver the pardon application, and attend pro-Trump rallies. [*E.g.*, Ex. 4 ("Press, Press, Press, get on

⁶ Eric Love's Twitter profile: <https://twitter.com/ericlovetexas?lang=en>.

TV.”); Ex. 5 (“[Y]ou must ride this wave in the press.”); Ex. 6 (“[S]o if everyone is willing to fly to DC to put this on Thursday take my money to get the plane tickets... just a simple National Press Conference in front [sic] of the White House....”). Tellingly, on January 6, 2021, Mr. Maldonado-Passage emailed Mr. Hernandez saying: “Let everyone know that went to DC I said thanks, and I saw the plane on channel 11 with ya all [sic] and rink....” [Ex. 7].

In 2020, Netflix and its production company, Goode Productions, began work on Tiger King 2, which focused, in part, on Mr. Maldonado-Passage’s efforts to get out of jail. On several occasions, Netflix and Goode Productions asked for Mr. Hernandez to sign a release to appear in Tiger King 2. [Exs. 8, 9]. Mr. Hernandez refused to sign the requested release due to his on-going representation of and loyalty to Mr. Maldonado-Passage. The below email evidences Mr. Hernandez’s refusal: “I wanted to let you know that I refused to sign the release....” [Ex. 10]. In response to Mr. Hernandez’s email, Mr. Maldonado-Passage encouraged Mr. Hernandez to “get your butt on tv and make a name for yourself, and if Rebecca⁷ wants to pay you take it Fran, Please, if your to [sic] proud to take it, take it and give it to EZ [nickname of Mr. Hernandez’s legal assistant] or donate it to the innocent [sic] project.”

JOSEPH MALDONADO-PASSAGE on 10/12/2020 9:50:56 AM wrote
man, get your butt on tv and make a name for yourself, and if Rebecca wants to pay you take it Fran, Please, if
your to proud to take it, take it and give it to EZ or donate it to the innocent project or something but she has
made so much money off of me,
Jeremy Gordon reached out to me, I gave him your numbers
——Hernandez, Fransico on 10/12/2020 7:41 AM wrote:

>

I want to let you know that I refused to sign the release they want me to sign and the members of the team. They have not offered nor do we want any compensation for it. But they keep insisting. I didn't ask to be on the show and I only agreed to film because Eric and Anne asked me to. None of my team wants to be a movie star. We're only working for you

[*Id.*]. Contrary to the complaint, Mr. Maldonado-Passage *wanted* Mr. Hernandez to appear in Tiger King 2 and wanted Mr. Hernandez to get paid for his appearance. Mr. Hernandez did not represent Mr. Maldonado-Passage to “make a name” for

⁷ “Rebecca” referenced in Mr. Maldonado-Passage’s email is Rebecca Chaiklin, a producer on Tiger King 2.

himself on television or make money—Mr. Hernandez declined both because Mr. Hernandez prioritized representing his client. [Ex. 10].

In January 2021, after President Trump did not pardon Mr. Maldonado-Passage, Mr. Maldonado-Passage engaged John Phillips, an attorney based in Florida, to take over for attorney Brandon Sample, handling the appeal of his conviction, plus a variety of other matters. Unlike Mr. Hernandez, Mr. Phillips was compensated for his representation of Mr. Maldonado-Passage and contracted for half of the royalties from Mr. Maldonado-Passage’s tell-all memoir, released in November 2021.⁸ [See Exs. 12, 16]. Admittedly, Mr. Hernandez and Mr. Phillips frequently butted heads related to the defense strategy and differences in approach to the media. For example, contrary to Mr. Hernandez, Mr. Phillips signed a release to appear in *Tiger King 2*.⁹ [Ex. 13]. Mr. Hernandez and Mr. Phillips also disagreed about Mr. Phillips’s simultaneous representation of Mr. Maldonado-Passage and Jeff Lowe,¹⁰ who actively conflicted with Mr. Maldonado-Passage over trademark issues. [Ex. 14]. Mr. Hernandez voiced his concerns about Mr. Phillips’s conflicts of interest to Mr. Maldonado-Passage on several occasions, which soured Mr. Hernandez’s relationship with Mr. Phillips and ultimately Mr. Maldonado-Passage. As stated above, Mr. Phillips still represents Mr. Maldonado-Passage.

During the first couple years of Mr. Maldonado-Passage’s time in prison, Mr. Hernandez managed Mr. Maldonado-Passage’s money through an IOLTA. Funds were deposited into the account from promotional deals, including for the *Tiger King*

⁸ Since Mr. Maldonado-Passage was paying Mr. Phillips, Mr. Maldonado-Passage expected Mr. Phillips to do the heavy lifting on the criminal and civil matters. [See Exs. 15, 16].

⁹ On Mr. Phillips’s website, he advertises that “lawyers at our office and our cases have appeared in 100’s of media outlets including regional, national, and international television, radio, magazines, newspapers and more.” Phillips & Hunt, <https://floridajustice.com/> (last visited June 8, 2022).

¹⁰ Upon information and belief, Jeff Lowe helped the government convict Mr. Maldonado-Passage for murder-for-hire.

2 documentary, Mr. Maldonado-Passage's book deal, and music royalties,¹¹ as well as donations from fans. Mr. Maldonado-Passage¹² and his former power-of-attorney Anne Patrick directed withdrawals from the account, in part, to pay for living expenses for Dillon Passage and Anne Patrick and for expenses to maintain the "Tiger King" brand. Unbeknownst to Mr. Hernandez, some payments that Mr. Maldonado-Passage directed Mr. Hernandez to make were cloaked payments for drug transactions in the prison. Indeed, Mr. Maldonado-Passage would lie to Mr. Hernandez, referring to the payments as expenses for tiger food, among other descriptions:

JOSEPH MALDONADO-PASSAGE on 2/27/2021 2:20:48 PM wrote
please let me know when you send Donna the money for food for my cats and whos name sent if please.

[Ex. 21]. Mr. Hernandez only learned of the true nature of these payments in September 2021, when Mr. Maldonado-Passage was caught in prison with a burner phone and admitted the practice to Mr. Hernandez. Of course, Mr. Hernandez told Mr. Maldonado-Passage to cease facilitating the drug payments and told the situation to Mr. Phillips, Mr. Maldonado-Passage's other attorney.¹³ Mr. Maldonado-Passage was angry with Mr. Hernandez over the confrontation and disclosure to Mr. Phillips, and Mr. Maldonado-Passage's relationship with Mr. Hernandez continued to sour until Mr. Hernandez ceased representing Mr. Maldonado-Passage in November 2021.

¹¹ Bradley Small, who represented Mr. Maldonado-Passage related to licensing deals, confirmed that Mr. Hernandez "did not make any entertainment/licensing deals, nor did he take any monies from [Mr. Maldonado-Passage] as payment." [Ex. 46].

¹² There are a substantial number of emails from Mr. Maldonado-Passage (from jail) to Mr. Hernandez directing Mr. Hernandez to use funds from the IOLTA account for various expenses. [E.g., Exs. 17, 18, 19, 20].

¹³ Mr. Hernandez also advised Ms. Patrick and Ms. Springer to cease participating in any more cloaked transactions and to keep all proof of the financial activity. Mr. Maldonado-Passage was to be re-sentenced, and Mr. Hernandez feared this activity would enhance Mr. Maldonado-Passage's sentence.

In March 2022, Mr. Maldonado-Passage filed for divorce from Dillon Passage in Florida, which is still pending.¹⁴ In the divorce proceeding, it is believed, based on the filings, that a main issue will be the amount of financial support Mr. Maldonado-Passage provided to Dillon Passage during the marriage and Mr. Maldonado-Passage's alleged personal property that Dillon Passage disposed of, including the Dodge Challenger¹⁵ and revolver. Many of the complaints involving Mr. Hernandez will be litigated in the divorce proceeding, likely over the next several years.

Mr. Hernandez will now respond to each complaint in detail to show he did not violate any Texas Disciplinary Rule of Professional Conduct.

II. Responses to Complaints

The complaint focuses on four issues: (A) alleged transactions with Dillon Passage, including the purchase of a Dodge Challenger and revolver; (B) promotion efforts; (C) funds in Mr. Hernandez's IOLTA account; and (D) outsourcing legal work to other attorneys. The complaint does not identify the Texas Disciplinary Rules of Professional Conduct that Mr. Hernandez allegedly violated. However, it seems like the complaint may attempt to allege violations under Disciplinary Rules of Professional Conduct 1.04, 1.08, and 1.14. Mr. Hernandez's responses show he did not violate any Disciplinary Rule, and his actions do not support a finding of Just Cause.

¹⁴ *Maldonado-Passage v. Passage*, Case No. 572022DR000525DRAXMX, Santa Rosa County, First Judicial Circuit of Florida. Dillon Passage has filed a motion to dismiss the divorce proceeding for lack of subject matter jurisdiction because neither party lives in Florida.

¹⁵ As explained in further detail below, the Dodge Challenger was a gift from Mr. Maldonado-Passage to Dillon Passage for his 25th birthday and was therefore not marital property. *Infra*, at 11.

A. Dealings with Dillon Passage

The complaint alleges that Mr. Hernandez and “his friend Eric Love signed contracts with my ex-husband [Dillon Passage] making product deals, book deals, and hiding money in his law office trust account, sending my ex-husband thousands of dollars and loaning him \$13,000 more and repaying himself out of more product deals.” The complaint also states that Mr. Hernandez purchased a car and a revolver from Dillon Passage. As shown below, (1) Jeff Hoover, another attorney representing Mr. Maldonado-Passage, *not* Mr. Hernandez purchased the revolver from Dillon Passage; (2) Mr. Hernandez purchased a car Dillon Passage owned and marketed for sale to others; (3) Mr. Hernandez did not sign any contracts with Dillon Passage; and (4) any payments made to Dillon Passage from Mr. Maldonado-Passage’s IOLTA were authorized by Mr. Maldonado-Passage or his power-of-attorney. Any complaint about Mr. Hernandez relating to Dillon Passage is solely based on Mr. Maldonado-Passage’s contempt for Dillon Passage, which is being litigated in their divorce proceedings.

Mr. Hernandez did not violate any Disciplinary Rule, and his actions do not support a finding of Just Cause related to Mr. Hernandez’s dealings with Dillon Passage.

1. Mr. Maldonado-Passage’s gun was sold to Jeff Hoover, not Mr. Hernandez.

The complaint alleges that Mr. Hernandez “bought [Mr. Maldonado-Passage’s] S&W 357 revolver and custom holster from [Mr. Maldonado-Passage’s] ex-husband [Dillon Passage] for \$1,500, when it was worth \$25,000.” Mr. Hernandez did not purchase, and does not possess, the revolver and holster. [Ex. 22].

When Mr. Maldonado-Passage went to prison, Dillon Passage possessed Mr. Maldonado-Passage’s personal property, including the revolver and the holster. In 2020, Mr. Maldonado-Passage sold the revolver and holster to a fan named Mike for \$700. Mike paid the \$700, but Dillon Passage refused to deliver the revolver and holster to Mike. Soon thereafter, Mike passed away and Dillon Passage maintained possession of the revolver and holster. [Ex. 23]. Prior to 2021, Dillon Passage held

an online auction of Mr. Maldonado-Passage's personal property, including the revolver. However, there were no bids on the revolver.

Because the revolver did not sell and as a "thank you" for all the work performed on his behalf, Mr. Maldonado-Passage and Mr. Maldonado-Passage's power-of-attorney, Anne Patrick, wanted to gift the revolver and holster to Jeff Hoover, another attorney representing Mr. Maldonado-Passage. [Ex. 24]. Mr. Hoover did not want a gift from Mr. Maldonado-Passage and insisted on paying \$1,500 for the revolver and an extra \$500 for the holster. [*Id.*]. Mr. Maldonado-Passage and Ms. Patrick knew that Mr. Hoover purchased the revolver and were pleased Dillon Passage was no longer in possession of it:

Yesterday, 4:59 PM

Do you have my gun and any coats

No. Remember Jeff bought the gun for 2k and I have not seen any coats

Ok

[Ex. 25].

AS SOON AS WE GET A CHECK IN YOUR CAN PAY THIS MONTHS. I WANT YOU TO GET THE GUN FROM DILLON FOR IT THOUGH

I WILL TELL DILLON

I can send Jeff's 1500 to Nathan if you tell Dillon to send the gun? I can give dillon a fedex account

OK I WILL TELL DILLON CAN YOU FEDFEX A GUN AND HOLSTER

[Ex. 24); Ex. 26 (“[T]hank God you [sic] bought my gun or [Dillon Passage] would have sold it also.”)].

Mr. Hernandez did not violate any Texas Disciplinary Rules of Professional Conduct related to the revolver and holster.

2. Mr. Maldonado-Passage gifted the car to Dillon Passage.

Mr. Hernandez did not violate any Texas Disciplinary Rule of Professional Conduct related to the used Dodge Challenger. The complaint alleges:

[Mr. Maldonado-Passage] had bought my husband at the time a Dodge Challenger for \$33,000 and had a lien on it for the full amount. In November of 2021, [Mr. Hernandez] came to the prison and had me sign the lien so he could put it in my name and scammed me out of my car, as he bought it for \$15,000, which is ½ of the lien I had. So he paid my ex-husband for the car... Then in November of 2021, right before Tiger King 2 came out, [Mr. Hernandez] wrapped the car with my trademark and took it around Dallas, Fort Worth to only benefit himself.

As the complaint admits, while in prison, Mr. Maldonado-Passage gifted Dillon Passage a used Dodge Challenger for his 25th birthday. [Ex. 27 (“[T]he car [Dillon] has now was paid in full for a birthday present last year.”)]. Mr. Maldonado-Passage titled the car solely in Dillon’s name. [Ex. 32]. Since Dillon Passage was irresponsible and had issues with driving while intoxicated, Mr. Hernandez suggested that Mr. Maldonado-Passage place a lien on the car, so, if necessary, Mr. Maldonado-Passage could get the car out of the auto pound without Dillon Passage’s authorization (who held record title). [Exs. 28; 32]. The lien on the car proved useful on at least one occasion when the car was impounded after Dillon Passage was arrested for driving while intoxicated. [Ex. 29].

In fall 2021, Dillon Passage and Mr. Maldonado-Passage decided to get a divorce, and Dillon Passage planned to market the car to sell it to a third party.¹⁶ With Mr. Maldonado-Passage’s knowledge and consent,¹⁷ Mr. Hernandez offered to give Dillon Passage a \$15,000 loan with the car as collateral—Dillon could pay Mr. Hernandez back by the end of 2021 to get the car back or keep the money. [Ex. 3]. Dillon Passage accepted this deal and delivered the car to Mr. Hernandez in September 2021. Mr. Maldonado-Passage knew about Mr. Hernandez’s arrangement with Dillon Passage and did not object. [Ex. 30]. For example, Mr. Maldonado-Passage knew that Mr. Hernandez spent approximately \$3,000 of Mr. Hernandez’s own money to wrap the car with the “Tiger King” logo to publicize Mr. Maldonado-Passage’s upcoming book,¹⁸ and Mr. Maldonado-Passage weighed in on the wrap design. [Ex. 34, pp. 2, 4; Ex. 35]. Anne Patrick, as Mr. Maldonado-Passage’s power-of-attorney, also approved Mr. Hernandez’s arrangement with Dillon Passage. [Ex. 3].

In October 2021, Dillon Passage decided that he wanted to keep the loaned money and transferred the car’s title to Mr. Hernandez. And, Mr. Maldonado-Passage signed paperwork *releasing* the lien on the car, allowing Mr. Hernandez to own the car outright. [Ex. 33]. Later, Mr. Maldonado-Passage decided that he wanted to purchase the car back from Mr. Hernandez and allow his new boyfriend, Seth, or Ms. Patrick drive the car. [Ex. 30; Ex. 34, p. 2]. Mr. Hernandez told Mr. Maldonado-Passage he could purchase the car for what Mr. Hernandez had in the

¹⁶ Upon information and belief, Dillon Passage intended to forge Mr. Maldonado-Passage’s signature to release the lien to sell the car to a third party.

¹⁷ By this time, Mr. Maldonado-Passage had spent the money in his IOLTA. Mr. Maldonado-Passage instructed his team, including Mr. Hernandez to market and support Mr. Maldonado-Passage’s upcoming memoir, which was to be a source of future income for Mr. Maldonado-Passage. Mr. Maldonado-Passage indicated that the car was a good marketing opportunity for the book. [Ex. 3].

¹⁸ Both Mr. Maldonado-Passage *and* Mr. *Phillips* received advance payments from the book contract and financially benefitted from any publicity for the book. [Exs. 3, 12, 16]. Mr. Hernandez did not financially benefit from Mr. Maldonado-Passage’s book. To the contrary, Mr. Hernandez, spent his own funds on the promotional materials and expenses for the book.

car, approximately \$30,000.¹⁹ Ultimately, Mr. Maldonado-Passage did not have enough money and did not purchase the car.

Contrary to the complaint, Mr. Maldonado-Passage only spent approximately \$25,000 to purchase the car. [Ex. 36]. In fall 2021, Mr. Maldonado-Passage acknowledged that the car was only worth between \$15,000 - \$18,000 and that Dillon Passage—the owner of the car—needed to be paid for it. [Ex. 30]. Mr. Maldonado-Passage’s lien, which he willingly released, was not worth \$33,000.

Mr. Hernandez did not engage in a business transaction with Mr. Maldonado Passage. Mr. Maldonado-Passage gifted the car to Dillon Passage, making the car Dillon Passage’s separate property.²⁰ Texas Disciplinary Rule of Professional Conduct 1.08 prohibits *client* transactions and expressly does not apply to “commercial transactions...that the client generally markets to others.” Tex. Disciplinary Rules Prof’l Conduct 1.08(a), (j). Mr. Hernandez did not represent Dillon Passage, and Dillon Passage generally marketed the car for sale to others before Mr. Hernandez bought it. Mr. Hernandez did not violate any Texas Disciplinary Rules of Professional Conduct related to the car.

3. Mr. Hernandez did not sign contracts with Dillon Passage.

The complaint alleges that Mr. Hernandez “and his friend Eric Love signed contracts with [Mr. Maldonado-Passage’s] ex-husband making product deals, book deals, and hiding the money in his law office trust account.” However, there are many falsities in that statement.

First, although Mr. Maldonado-Passage has filed for divorce, he is still legally married to Dillon Passage. As mentioned above, the on-going dispute between Mr.

¹⁹ Using his own money, Mr. Hernandez paid the \$15,000 purchase price, approximately \$3,000 to wrap the car, maintenance for the car, and the car’s insurance. [Ex. 35].

²⁰ Again, if there is a dispute as to whether the car was community property or Dillon Passage’s separate property, that issue will be resolved in Mr. Maldonado-Passage’s divorce proceeding, which is still pending.

Maldonado-Passage and Dillon Passage related to the financial support given to Dillon Passage during the marriage and the division of any community property is believed to be at the forefront of the divorce proceedings.

Second, Mr. Hernandez did not execute any contracts, product deals, or book deals with Dillon Passage. [See Ex. 46]. The complaint is confusing as Mr. Hernandez is a criminal defense attorney and is not a book publisher or a seller goods. Mr. Love did not execute any contracts with Dillon Passage either. And, in a text message to Mr. Hernandez, Mr. Maldonado-Passage admitted that “no contracts are in [Dillon Passage’s] name and [Mr. Hernandez] have [sic] records of [Dillon’s] payments.” [Ex. 25].

Third, Mr. Hernandez did not hide any money in his IOLTA for Mr. Maldonado-Passage. Throughout Mr. Hernandez’s representation of Mr. Maldonado-Passage, Mr. Hernandez provided information and updates about the money deposited into and withdrawn from the IOLTA. [E.g., Ex. 37 (Mr. Maldonado-Passage: “hey, can you tell me what is in escrow” Mr. Hernandez: “about 50.”); Ex. 24 (“there is about 4500 in the account)]. And, in January 2022, Mr. Hernandez provided Mr. Maldonado-Passage’s attorney, John Phillips, with a detailed ledger of the money deposited into and withdrawn from the IOLTA, which is supported by approximately 500 pages of documentation.²¹ [Ex. 38].

Mr. Hernandez did not violate any Texas Disciplinary Rules of Professional Conduct related to alleged contracts with Dillon Passage.

B. Mr. Maldonado-Passage routinely authorized support payments to Dillon Passage.

The complaint alleges that Mr. Hernandez “sen[t] my ex-husband thousands of dollars and loan[ed] him \$13,000 more and repaying himself out of more product deals.” While Mr. Maldonado-Passage was in prison, he continued to financially support Dillon Passage. Mr. Maldonado-Passage and Ms. Patrick (former power-of-

²¹ If helpful, Mr. Hernandez can produce the approximately 500 pages of supporting documentation.

attorney) frequently instructed Mr. Hernandez to send Dillon Passage money for rent, food, utilities, and miscellaneous expenses. [E.g., Ex. 39 (rent payments); Ex. 40 (miscellaneous expenses); Ex. 18 (“Dillon is to always get 1500.00 on the 13th of each month...); Ex. 37 (“and don’t forget Dillon on the 24th 3000.00 in case I am out of touch for any reason.”); Ex. 19 (“Fran has been asked to take the money from escrow and get your car tags which is around 2600.00”)]. Moreover, Mr. Hernandez never loaned Dillon Passage \$13,000.

Mr. Maldonado-Passage was frustrated with how reckless Dillon Passage was with Mr. Maldonado-Passage’s money. For example, Mr. Maldonado-Passage complained to Mr. Hernandez and Ms. Patrick that Dillon Passage:

was suppose [sic] to get 500 to get storage and gas money to go to Texas and 700.00 for insurance and money to live on at his sisters until we figure out something on this house deal. He is not paying rent right now and he is not paying a car payment, he goes and gets a 100.00 tattoo and buys his female friend a 200.00 make up mirror and then goes to atlanta [sic] for his manager and I have to pay that bill too.

[Ex. 41]. These issues will be properly addressed in Mr. Maldonado-Passage’s divorce proceedings.

Any financial support provided to Dillon Passage out of Mr. Maldonado-Passage’s IOLTA was requested and authorized by either Mr. Maldonado-Passage or Ms. Patrick. Mr. Hernandez did not violate any Texas Disciplinary Rule of Professional Conduct related to financial support payments for Dillon Passage.

B. Mr. Maldonado-Passage did not have \$10,000 remaining in his IOLTA account.

The complaint alleges that “[u]pon firing [Mr. Hernandez], there was over \$10,000 in the trust account as he told me there was in November and when I asked for it, he produced bills where he cooked the books....” Mr. Hernandez did not

inform Mr. Maldonado-Passage that there was \$10,000 left in the IOLTA in November 2021. Contrary to the complaint, at the end of Mr. Hernandez's representation, Mr. Maldonado-Passage's IOLTA was overdrawn by almost \$15,000, consisting of a payment to Mr. Phillips, Mr. Maldonado-Passage's new attorney, and payments to Ms. Patrick and Ms. Springer. [Ex. 38]. Mr. Hernandez paid for these expenses out of his own pocket and does not seek repayment by Mr. Maldonado-Passage. Tex. Disciplinary Rules Prof'l Conduct 1.08 (d)(1) ("a lawyer may advance or guarantee court costs, expenses of litigation or administrative proceedings, and reasonably necessary medical and living expenses, the repayment of which may be contingent on the outcome of the matter.").

Tamara Springer, Mr. Maldonado-Passage's alleged power-of-attorney and likely the person who submitted this complaint, emailed me (Roland Johnson) in February 2022 asking for the "status of the \$9,000 in his trust fund that [Mr. Hernandez] has not yet turned over to [Ms. Springer]." [Ex. 42]. As detailed above, Mr. Phillips was provided a ledger in January 2022, showing that there was no money left in the IOLTA. From February 2022 until the complaint in April 2022, the "amount remaining" in the IOLTA claimed by Ms. Springer inexplicably grew from \$9,000 to \$10,000 without any documentation whatsoever. Ms. Springer's inconsistencies show that she has no basis to claim there is money remaining in the IOLTA. Indeed, the complaint appears to be an effort to generate some much-needed cash.²²

Mr. Hernandez did not violate any Texas Disciplinary Rule of Professional Conduct related to the allegation that \$10,000 remain in Mr. Maldonado-Passage's IOLTA.

C. Mr. Hernandez did not engage in self-dealing or self-promotion.

The complaint claims Mr. Hernandez:

took it upon himself to rent a large bus and wrap it with my image and take it to Washington, D.C. to make a movie

²² Again, the State Bar grievance system cannot award damages.

for Tiger King 2 without my knowledge, then big limos, private jets, all to film with Tiger King 2. ...Then in November 2021, [Mr. Hernandez] wrapped the car with my trademark and took it around Dallas, Fort Worth to only benefit himself.

As seen above, on numerous occasions Mr. Maldonado-Passage instructed Mr. Hernandez and others to create publicity for Mr. Maldonado-Passage's pardon application and efforts to get out of jail. *Supra*, at 4-5. Mr. Maldonado-Passage knew about, and approved, the trips to Washington D.C. and the car wrap. [*E.g.*, Exs. 3, 6, 7, 34]. Mr. Maldonado-Passage did not pay for the large bus, limos, private jets, or the car wrap.

Specifically, Mr. Hernandez and other representatives of Mr. Maldonado-Passage, including Eric Love and Jeff Hoover, went to Washington D.C. on a few occasions to generate support and publicity for Mr. Maldonado-Passage's pardon application. For the first trip, Eric Love—using his own money—obtained the use of a large bus to drive to Washington D.C. with some of Mr. Maldonado-Passage's supporters. [Ex. 3]. Mr. Maldonado-Passage also authorized using his money in the IOLTA for plane tickets for Anne Patrick to join Mr. Love in Washington D.C. [Ex. 6]. Mr. Hernandez, at Mr. Maldonado-Passage's insistence, also traveled to Washington D.C. with Anne Patrick and Dillon Passage for a press conference:

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Sunday, December 13, 2020 2:37 PM
To: texasmexicolaw@icloud.com
Subject: D.C.

12.13.20 2.10pm

Fran, Ann, Dillon, Rebecca

I need Rebecca to work with Fran and Ann to put this together if we are going to do this it has to be done by Thur or we will not get anything done until after the 1st of Jan. so if everyone is willing to fly to DC to put this on Thursday take my money to get the plane tickets and such to get this done and since Dillon is willing to go also, we do NOT need this to be a circus, just a simple National Press Conference in front of the White House with Lawyers, the informant and my Husband.

[*Id.*].

Mr. Hernandez also traveled to Washington D.C. on January 6, 2021, to attend (what they thought) was simply a pro-Trump rally, to encourage President Trump to sign the pardon for Mr. Maldonado-Passage. Mr. Hernandez's friend offered to loan Mr. Maldonado-Passage's team his private jet to fly to Washington D.C., if Mr. Hernandez would cover the cost of gas and landing fees, which Mr. Hernandez and Mr. Hoover did. [Ex. 31]. Again, Mr. Maldonado-Passage knew about this trip and helped organize it:

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Tuesday, December 29, 2020 3:35 PM
To: texasmexicolaw@icloud.com
Subject: jan 6

12.29.20 3.20pm

Fran is thinking about him and Eric flying to DC on the 6th when Trump is calling for that rally. You all need to get with him and if he is schedule an event for fans to go, but I am trying to get him to do a press conference as well since the media will already be there, and if we have to have Ann get 200 cds and give away for people that have free joe exotic signs.
this gives over a week to get going.
Treaasa/Jim what you think?

[Ex. 43].

Regarding Mr. Hernandez's participation in Tiger King 2, Mr. Maldonado-Passage knows that Mr. Hernandez refused, repeatedly, to sign a release with the production company to appear in Tiger King 2. [Ex. 10 ("I want to let you know that I refused to sign the release they want me to sign and the members of the team. They have not offered nor do we want any compensation for it. But they keep insisting.")]. Mr. Maldonado-Passage acknowledged to the documentary producers that Mr. Hernandez and Mr. Hoover have "not nor will they sign anything giving you permission to use what you filmed with them." [Ex. 13]. However, Mr. Maldonado-Passage also encouraged Mr. Hernandez to "get [his] butt on tv and make a name for [himself]." [Ex. 10].

Ultimately, in March 2021, Mr. Maldonado-Passage needed money for a house payment and instructed Mr. Hernandez to authorize the production company to use footage of Mr. Hernandez related to the pardon application in exchange for depositing \$15,500 into *Mr. Maldonado-Passage's IOLTA*.²³ [Ex. 11]. Mr. Hernandez was not paid to appear in Tiger King 2:

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Saturday, March 13, 2021 2:06 PM
To: texasmexicolaw@icloud.com
Subject: attorney/client

3.13.21 10.22am

Fran/Rebecca

Fran

Rebecca is going to help me with the house pmt, she is suppose to put 15,500.00 in your escrow and I will tell you how to send money to owner of the house, this will take care of the house until Nov, of this year, I told her that I have no problem with you signing what ever to use the footage of the pardon stuff as long as some word in there is removed to not own you for the rest of my life or yours, as long as your comfortable with the wording go ahead and sign it please, she seems to be the only one out there helping with my bills. as soon as it hits your account this week and the papers are to your liking, sign it.

Thanks

[Ex. 11]. Mr. Maldonado-Passage wanted Mr. Hernandez to appear in Tiger King 2 exclusively for Mr. Maldonado-Passage's financial benefit.

As previously stated, Mr. Hernandez did not use any of Mr. Maldonado-Passage's money to wrap Dillon Passage's car with the Tiger King book logo. *Supra*, at 12-13. Again, Mr. Maldonado-Passage knew about the car wrap and weighed in on the design. [*Id.*]. Mr. Hernandez spent his own money to wrap the car to publicize Mr. Maldonado-Passage's upcoming book, which Mr. Maldonado-Passage hoped to generate much-needed money. [*Id.*]. Mr. Hernandez had no financial interest in the book and did not benefit from wrapping the car.

²³ In the end, Goode Productions never made the proposed \$15,000.00 payment to Mr. Maldonado-Passage because Mr. Hernandez continued to refuse to sign the Personal Release.

Mr. Hernandez did not engage in self-dealing or self-promotion related to the trips to Washington D.C., appearing in Tiger King 2, or wrapping the car. Mr. Hernandez did not violate any Texas Disciplinary Rules of Professional Conduct.

D. Mr. Maldonado-Passage knew about and authorized outsourcing of legal work.

Contrary to the complaint, Mr. Maldonado-Passage knew about and authorized Mr. Hernandez to engage other lawyers to assist with the motion to set aside Mr. Maldonado-Passage's sentence, a mandamus, and other motions and research. In July 2020, Mr. Hernandez recounted to Mr. Maldonado-Passage some of the attorneys who were working on Mr. Maldonado-Passage's behalf:

Elliot Crawford in Oklahoma, Jim Zadeh, Sophia Maas, all worked on [a Motion and Petition in Intervention] and did a great job.... William Taylor is the Federal Court super lawyer. He ONLY works for lawyers. He is a good friend and is absolutely brilliant. I'm just letting you know some of the names of the folks working for you.... Phillip Hall, my associate, working on the Pardon with Victoria at Brandon's office. Jeff Hoover, my best friend since 1984, co counsel and keeps track of your file. Jeff paid all the expenses for the Bus and Trump Hotel for the Washington DC trip.

[Ex. 44]. To which Mr. Maldonado-Passage replied:

I cannot thank you enough and you really don't know me yet but you will see I am a guy that will never forget what you have done for me, you get me out of here and life will be great for all of you, I will make sure that happens....

[*Id.*].

Another time, Mr. Hernandez told Mr. Maldonado-Passage to review legal research performed by William Taylor:

if you still have the research that my friend William Taylor did, take a look at it again and tell me what you think. He put a lot of work into that. if you no longer have it, I will send again.

[Ex. 45]. In response, Mr. Maldonado-Passage acknowledged that other attorneys were performing work on his behalf, writing: “I sent that paperwork back to you I think that your friend did.” [*Id.*].

Mr. Maldonado-Passage knew, and approved, that Mr. Hernandez outsourced legal research and writing to other attorneys. Mr. Hernandez did not violate any Texas Disciplinary Rules of Professional Conduct related to the outsourcing of legal work to other attorneys.

III. Conclusion

Mr. Hernandez acted in the best interests of his client, Mr. Maldonado-Passage. Mr. Hernandez did not self-deal or self-publicize and did not engage in improper transactions with Mr. Maldonado-Passage. Mr. Hernandez did not purchase Mr. Maldonado-Passage’s revolver, and Mr. Hernandez purchased the car from Dillon Passage, Mr. Maldonado-Passage’s husband, who owned the car. Any dispute about the proper owner of the revolver and the car should occur in Mr. Maldonado-Passage and Dillon Passage’s divorce proceeding. Additionally, Mr. Maldonado-Passage or his former power-of-attorney, Anne Patrick, authorized withdrawals from Mr. Maldonado-Passage’s IOLTA. No money remains in the IOLTA to distribute.

Mr. Hernandez requests that you find there is no Just Cause to believe professional misconduct occurred. Mr. Hernandez requests that you refer this complaint to the Summary Disposition Panel in Tarrant County for dismissal. If this matter proceeds, Mr. Hernandez requests that any proceedings occur in Tarrant County.

Mr. Kenneth W. Kirkland

July 12, 2022

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To comply with Rule 2.10 of the Texas Rules of Disciplinary Procedure, which requires a copy of Mr. Hernandez's response to be sent directly to the Complainant, I have sent a copy of this response to the email address provided in the Complaint (joeexoticusa@yahoo.com). However, upon information and belief, Mr. Maldonado-Passage may not have access to that email address. Please let me know if I need to forward Mr. Hernandez's response to Mr. Maldonado-Passage in another manner.

Thank you for reading Mr. Hernandez's response and your service to our citizens and the Bar. Mr. Hernandez respectfully reserves the right to provide additional information in the resolution of this Complaint. Please let me know if you have specific questions.

Sincerely,



Roland K. Johnson

RKJ/cmc

cc: Ms. Tamara Springer

Appendix in Support of Francisco Hernandez’s Response to Complaint

Exhibit No.	Description
1	Purported North Carolina Power of Attorney designating Tamara R. Springer as power-of-attorney for Joseph Maldonado-Passage
2	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated February 10, 2021, regarding Anne Patrick as power-of-attorney
3	Statement by Anne Patrick
4	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated October 9, 2020, encouraging attorneys to get in the press
5	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated October 9, 2020, regarding opportunity for press
6	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated December 13, 2020, asking team to travel to Washington D.C. for national press conference
7	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated January 6, 2021, thanking team for traveling to Washington D.C. for rally
8	Emails between Francisco Hernandez and Jeremy Bride, Leif Cervantes de Reinstein, and Kelsey Pflieger, dated October 2020, regarding release to appear in Tiger King 2
9	Email from Francisco Hernandez to Joseph Maldonado-Passage, dated March 23, 2021, regarding email from Francisco Hernandez to Kelsey Pflieger about release to appear in Tiger King 2
10	Emails between Francisco Hernandez and Joseph Maldonado-Passage, dated October 12, 2020, regarding Francisco Hernandez appearing in Tiger King 2
11	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated March 13, 2021, encouraging Francisco Hernandez to sign a release to appear in Tiger King 2 in exchange for \$15,500 paid to Joseph Maldonado-Passage
12	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated February 25, 2021, regarding John Phillips being paid out of Joseph Maldonado-Passage’s book deal
13	Email from Joseph Maldonado-Passage to Francisco Hernandez, directed at the producers of Tiger King 2, dated February 25, 2021, regarding releases from John Phillips, Francisco Hernandez, and Jeff Hoover to appear in Tiger King 2

14	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated May 27, 2021, regarding John Phillips's representation of Jeff Lowe and potential conflicts
15	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated February 17, 2021, regarding John Phillips
16	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated February 10, 2021, regarding John Phillips
17	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated April 27, 2021, regarding money for Dillon Passage
18	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated January 7, 2021, regarding money for Dillon Passage
19	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated October 15, 2020, regarding money for Dillon Passage
20	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated October 15, 2020, regarding expenses for Dillon Passage
21	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated February 27, 2021, regarding Joseph Maldonado-Passage instructing Francisco Hernandez to send money to "Donna"
22	Copy of check from Jeff Hoover to Joseph Maldonado-Passage's IOLTA, dated July 9, 2021, for the revolver
23	Text messages between Francisco Hernandez and Dillon Passage regarding Jeff Hoover's purchase of the revolver
24	Text messages between Francisco Hernandez and Anne Patrick
25	Text messages between Joseph Maldonado-Passage and Francisco Hernandez
26	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated August 12, 2021, regarding the revolver
27	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated August 25, 2021, regarding the Dodge Challenger purchased for Dillon Passage
28	Emails between Joseph-Maldonado-Passage and Francisco Hernandez, dated August 4, 2020, regarding purchase of the Dodge Challenger for Dillon Passage
29	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated November 2020, regarding Dillon Passage arrested for DWI

30	Letter from Joseph Maldonado-Passage to Anne Patrick, dated September 30, 2021, regarding Francisco Hernandez's purchase of the Dodge Challenger
31	Email from Francisco Hernandez to Joseph Maldonado-Passage, dated January 5, 2021, regarding trip to Washington D.C. via donated private jet
32	Copy of car title for Dodge Challenger in Dillon Passage's name
33	Copy of Application for Texas Title and/or Registration, dated October 2021, transferring the Dodge Challenger to Francisco Hernandez
34	Letter from Joseph Maldonado-Passage to Francisco Hernandez and Anne Patrick, dated October 13, 2021, regarding the Dodge Challenger
35	List of expenses for Dodge Challenger paid for by Francisco Hernandez
36	Copy of wire transfers from Joseph Maldonado-Passage's IOLTA to Gulf Chrysler Dodge to purchase the Dodge Challenger for Dillon Passage
37	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated July 20, 2020, regarding balance of IOLTA
38	Copy of IOLTA summary of debits and credits
39	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated January 7, 2021, regarding money for Dillon Passage
40	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated January 6, 2021, regarding money for Dillon Passage
41	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated October 14, 2020, regarding money for Dillon Passage
42	Emails between Tamara Springer, Roland Johnson, John Phillips, and Caroline Cyrier, dated February 2022, regarding IOLTA balance and the Dodge Challenger
43	Email from Joseph Maldonado-Passage to Francisco Hernandez, dated December 29, 2020, regarding Washington D.C. trip for rally
44	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated July 2020, regarding other attorneys working on matters for Joseph Maldonado-Passage

45	Emails between Joseph Maldonado-Passage and Francisco Hernandez, dated July 27, 2020, regarding work performed by William Taylor for Joseph Maldonado-Passage
46	Letter from Bradley S. Small, dated May 14, 2022

Exhibit 1

NORTH CAROLINA POWER OF ATTORNEY

NOTICE: THE POWERS GRANTED BY THIS DOCUMENT ARE BROAD AND SWEEPING. THEY ARE DEFINED IN CHAPTER 32C OF THE NORTH CAROLINA GENERAL STATUTES WHICH EXPRESSLY PERMITS THE USE OF ANY OTHER OR DIFFERENT FORM OF POWER OF ATTORNEY DESIRED BY THE PARTIES CONCERNED.

IMPORTANT INFORMATION

This power of attorney authorizes another person (your agent) to make decisions concerning your property for you (the principal). Your agent will be able to make decisions and act with respect to your property (including your money) whether or not you are able to act for yourself. The meaning of authority over subjects listed on this form is explained in the North Carolina Uniform Power of Attorney Act.

This power of attorney does not authorize the agent to make health care decisions for you.

You should select someone you trust to serve as your agent. Unless you specify otherwise, generally the agent's authority will continue until you die or revoke the power of attorney or the agent resigns or is unable to act for you.

Your agent is entitled to reasonable compensation unless you state otherwise in the Additional Provisions and Exclusions.

This form provides for designation of one agent, successor agent, and second successor agent. If you wish to name more than one agent, successor agent, and second successor agent, you may name a coagent, successor coagent, or second successor coagent in the Additional Provisions and Exclusions. Coagents, successor coagents, or second successor coagents are not required to act together unless you include that requirement in the Additional Provisions and Exclusions.

If your agent is unable or unwilling to act for you, your power of attorney will end unless you have named a successor agent. You may also name a second successor agent. This power of attorney becomes effective immediately.

If you have questions about the power of attorney or the authority you are granting to your agent, you should seek legal advice before signing this form.

DESIGNATION OF AGENT

I, Joseph Melton da Passare, name the following person as my agent: TAMARA R SPRINGER
55327 Cedar Ln.
MISHAWAKA IN.
46545

- (M) Tax matters
- (N) All Preceding Subjects

GRANT OF SPECIFIC AUTHORITY (OPTIONAL)

My agent MAY NOT do any of the following specific acts for me UNLESS I have INITIALED the specific authority listed below:

(CAUTION: Granting any of the following will give your agent the authority to take actions that could significantly reduce your property or change how your property is distributed at your death. INITIAL ONLY the specific authority you WANT to give your agent.)

- (A) Make a gift, subject to the limitations provided in G.S. 32C-2-217
- (B) Create or change rights of survivorship
- (C) Create or change a beneficiary designation
- (D) Authorize another person to exercise the authority granted under this power of attorney
- (E) Waive the principal's right to be a beneficiary of a joint and survivor annuity, including a survivor benefit under a retirement plan
- (F) Exercise fiduciary powers that the principal has authority to delegate
- (G) Disclaim or refuse an interest in property, including a power of appointment
- (H) Access the content of electronic communications

EXERCISE OF SPECIFIC AUTHORITY IN FAVOR OF AGENT (OPTIONAL)

UNLESS INITIALED, an agent MAY NOT exercise any of the grants of specific authority initialed above in favor of the agent or an individual to whom the agent owes a legal obligation of support.

ADDITIONAL PROVISIONS AND EXCLUSIONS (OPTIONAL)

Yes [Initial] Sign all Contracts and legal Papers I approve, no one has the Authority to turn down any deals except me.
open up me AN ACCOUNT FOR PERSONAL Bills, & legal Bills,
THIS will Replace any other POA,
MAKE sure I AM not placed on Any like Support, Ventilator or
-- Feeding Tube.

Yes

DESIGNATION OF SUCCESSOR AGENT(S) (OPTIONAL)

If my agent is unable or unwilling to act for me, I name my successor agent: Amy Lee

If my successor agent is unable or unwilling to act for me, I name as my second successor agent:
None

INITIAL below if you want to give an agent the power to name a successor agent.

NO I give to my acting agent the full power to appoint another to act as my agent, and full power to revoke such appointment, if no agent named by me above is willing or able to act.

GRANT OF GENERAL AUTHORITY

I grant my agent and any successor agent general authority to act for me with respect to the following subjects as defined in the North Carolina Uniform Power of Attorney Act, Chapter 32C of the General Statutes:

(INITIAL each subject you want to include in the agent's general authority. If you wish to grant general authority over all of the subjects you may initial "All Preceding Subjects" instead of initialing each subject.)

- NO (A) Real Property
- yes yes (B) Tangible Personal Property
- NO (C) Stocks and Bonds
- NO (D) Commodities and Options
- yes yes (E) Banks and Other Financial Institutions
- yes yes (F) Operation of Entity or Business
- NO (G) Insurance and Annuities
- NO (H) Estates, Trusts, and Other Beneficial Interests
- yes yes (I) Claims and Litigation
- yes yes (J) Personal and Family Maintenance
- NO (K) Benefits from Governmental Programs or Civil or Military Service
- NO (L) Retirement Plans

EFFECTIVE DATE

This power of attorney is effective immediately.

TERMINATION (Check one and strike out the other)

DURABLE Power of Attorney. This power of attorney shall not be affected by my subsequent disability or incapacity, or lapse of time.

~~REGULAR Power of Attorney. This power of attorney shall terminate if I become disabled or incapacitated.~~

NOMINATION OF GUARDIAN (OPTIONAL)

INITIAL below ONLY if you WANT your acting agent to be your Guardian.

JM If it becomes necessary for a court to appoint a guardian of my estate or a general guardian, I nominate my agent acting under this power of attorney to be the guardian to serve without bond or other security.

RELIANCE ON THIS POWER OF ATTORNEY

Any person, including my agent, may rely upon the validity of this power of attorney or a copy of it unless that person knows it has terminated or is invalid.

MEANING AND EFFECT

The meaning and effect of this power of attorney shall for all purposes be determined by the law of the State of North Carolina.

SIGNATURE AND ACKNOWLEDGMENT OF PRINCIPAL

Your Signature: Joseph Maldonado Passarell Date: 12-1-21
Your Name Printed: Joseph Maldonado Passarell
Your Address: Emc Butner PO Box 1600 Butner NC 29509
Your Telephone Number: none

State of North Carolina, County of Durham

I certify that the following person personally appeared before me this day, acknowledging to me that he or she signed the foregoing document: Power of Attorney

12/1/2021
Date

[Signature]
Signature of Notary Public

(Official Seal)

Tywanna Crudup, Notary Public
Printed or typed name

My commission expires:

5/2/2023

**Tywanna Crudup
NOTARY PUBLIC
Durham County, NC
My Commission Expires May 02, 2023**

Exhibit 2

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Wednesday, February 10, 2021 10:07 PM

To: texasmexicolaw@icloud.com

Subject: information

2.10.21

Jim is going to be hired by John so they can deal with rebecca through that angle, I need fran to type up a contract for me to hire Treasa for 1.00 per year as my PR and spokes person, and Ann can sign it as my POA and then if Rebecca says anything else John will take care of that with this lawsuit he will be doing for obstruction, witness tamperin and all. so please make this happen so Treasa and Jim dont have to worry and get back to work please

Exhibit 3

My name is Anne Patrick and this is my statement in response to Joseph's complaint. So let's start with the beginning of his crock pot complaint. Francisco was hired in April 2020, not March of 2020.

First, let's be clear, I was not a "friend" as he states. I was his Power of Attorney. Joseph specifically asked me to look for and hire an attorney during his 89-day lockdown in jail.

Joseph sent me Eric Love's name and told me to call him. Eric Love is the one who contacted Francisco, for me. Francisco was the only one that I could find that would take the case without a huge retainer. In fact, Francisco and Eric put together a team of volunteer lawyers and fans who wanted to help.

Francisco even got Mike Ware and Allison Clayton, Founder and Executive Director of the Texas Innocence Project, respectively, to come on the team (in their individual capacities) and handle the Direct Appeal, the Presidential Pardon Application, a Rule 33 Motion for New Trial and a 2255 if necessary.

However, Joseph insisted that Francisco bring Brandon Sample onto Team Tiger instead of following Francisco's recommendation. Brandon is a lawyer who served Federal Prison Time and was married to a man. But, during the time for briefing Joseph's appeal, Brandon had an affair with his 20 year old assistant, his husband divorced him and during this drama, Brandon went AWOL. In the end, Brandon filed a brief with two sentencing issues. He did not brief the issue of whether the Judge should

have severed the counts in a superseding indictment. That issue was perfectly preserved by the Public Defenders and was never brought up by Brandon or even John Phillips, Joseph's current attorney. Francisco even wrote letter briefs for Joseph to send on the issue so it would not be automatically waived.

Brandon also asked Joseph to let him handle the Pardon Application because of his connections at the Office of Presidential Pardons. Once Brandon went AWOL, Francisco and his team had to start from scratch.

To be clear, Francisco had the two leading lawyers for the Texas Innocence Project ready and committed to handle the Direct Appeal, the Pardon Application, Rule 33 Motion for New Trial and even a 2255 Post Conviction Writ. All three times, Joseph went against Francisco's advice.

After the Direct Appeal Oral Argument, Joseph asked Francisco to bring John Phillips onto the team. This was the third time that Joseph declined Francisco's advice to bring on Mike Ware and Allison Clayton.

We now know that it was Rebecca Chalkin, an executive producer for the Netflix documentary "Tiger King," that urged Joseph to bring on John Phillips because Francisco and all of the members of Team Tiger refused to participate in the filming and promotion of Tiger King 2.

John Phillips later told Francisco that he had a contractual agreement with Goode Productions, the production company for Tiger King 1 and Tiger King 2, and was

obligated to cooperate with them. Francisco was concerned about the potential conflict of interest for John Phillips to also have a contractual agreement, in exchange for consideration, with the producers of Tiger King 2.

This is where the relationship went south. John Phillips began poisoning Joseph telling him that Team Tiger had spent all of his money and were only pursuing fame.

Francisco never took it upon himself to rent a giant bus, private jet, or anything else. Eric Love did that. Plus, use of the bus and jet were donated by friends. All this was done because Joseph told me, as his power of attorney, to keep him front and center in the media. I was to make sure that he stayed in the news at all times after Tiger King 1 so he could make money and get a pardon from Donald Trump the President at the time. Francisco and I continually told Joseph that we were not participating in Tiger King 2.

Joseph, at his insistence, kept speaking to Rebecca Chaklin and Eric Goode, the producers of Tiger King 1 and Tiger King 2, making sure they showed up everywhere Francisco was, at Joseph's insistence.

At no time did any of us want to deal with Goode Productions or participate in Tiger King 2. We were doing as Joseph Maldonado-Passage insisted we do with big limos and jet stuff. Again, this was all at Joseph's insistence, and cost him nothing. Not one penny did Joseph spend on any of this. This all came out of the pockets of Eric Love, Francisco Hernandez, and anybody else who was putting in money and volunteering.

As far as this signing contracts, Joseph says then Francisco and his friend Eric Love signed contracts with Joseph's ex-husband Dillon Passage. Francisco has never in any way shape or form signed any contracts for product deals, book deals, hidden money, any of this stuff. Every single penny was approved through me, Anne Patrick, which also was approved through Joseph; including the birthday present of the \$33,000 car that Joseph insisted I approve for Dillon's 25th birthday. Francisco never loaned Dillon \$13,000, and Dillon had no participation in any product deals. I have no idea what Joseph is talking about. Dillon had no participation in any deals whatsoever. Neither did Francisco Hernandez. Neither did Anne Patrick. Not one of us received one penny from any deals Joseph had. Every single penny went to Joseph

The car, the \$33,000 Dodge Challenger that Joseph is referring to was a birthday present to Dillon. Later when they were trying to get divorced, Dillon's only request was that he got the Challenger, which was his birthday present. So Joseph took the lien off so that he could have the car in the divorce. But then Joseph kept changing his mind and saying no, he wasn't going to sign the divorce papers.

Francisco never bought the car for \$15,000. With my approval as power of attorney for Joseph, Francisco loaned \$15,000 to Dillon Passage, saying that if Dillon did not pay back the \$15,000 by December 31, 2021 that Francisco was to keep the car. Dillon did not want the car. He wanted to be away from Joseph and didn't want to have anything to do with Joseph anymore.

Francisco Hernandez wrapped that Challenger after he got it from Dillon Passage. Joseph told myself, Anne Patrick, and Francisco Hernandez, that we had to, "play nice" with John Phillips, his new attorney. Since John Phillips was being paid through the profits from Joseph's book, the car was wrapped as a promotion to help promote the book and get more money out of it. Because again, Joseph told us to play nice, and that was what we were all trying to do, So, Francisco Hernandez never benefited one penny, from wrapping of that car. Again, I don't know where Joseph Maldonado-Passage was getting all of this nonsense.

As far as the custom gun and holster, those were already sold at one point for \$700 to a guy named Mike from the Tiger King truck stop. Mike has passed away since then. Dillon never got a chance to drop off the gun to Mike, but Joseph received \$700 for the gun. The gun belonged to Dillon as it was in Dillon's possession. Dillon was giving the gun to Jeff Hoover as a gift for all the help and work that he did for Joseph. Dillon needed rent money, so Jeff gave him \$1,500 to pay his rent, out of the goodness of his heart. Dillon was giving him the gun that belong to Dillon because Joseph had already sold it and got the \$700. It was never worth \$25,000, I have no idea where Joseph's getting that number. We could not even get one bid on it when we previously put it up for auction on the NFT. Zero bids on the NFT for the gun. So where he's getting \$25,000, again is an imaginary number that he's making up.

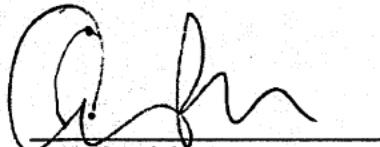
Regarding the money in the IOLTA, there was not \$10,000 remaining. In fact, there was barely enough money. Joseph was supporting a new boyfriend names Seth, sending him rent and car money, sending Tamara Springer money, and sending thousands of dollars at a time to John Graham, another prisoner who Joseph had a relationship with. So there was not money in the account. Joseph got every penny of the money and actually, more money, than was in the account.

As far as Francisco producing bills, and this nasty allegation about cooking the books, we have every single penny accounted for. I have every email, every voice recording, every screenshot of every penny that was sent to Joseph, sent to people for Joseph that Joseph approved.

Joseph Maldonado-Passage approved every single transaction of funds. And I made sure that he wrote it all in emails and messages. And Francisco Hernandez never paid anyone without my approval, through text message or email. Again, my name is Anne Patrick, I was at the time Power of Attorney for Joseph Maldonado Passage. Francisco Hernandez never did business with Joseph's ex-husband, Dillon Passage. If Dillon sold, Joseph Maldonado-Passage's belongings, that had nothing to do with Francisco Hernandez, that is between Joseph Maldonado and Dillon Passage. Regarding the lien on the Challenger, Francisco was to take the lien off, so that Dillon would give Joseph a divorce because Joseph was already in a relationship with another inmate. The

\$10,000 in cash that Joseph's alleging was hidden, was never hidden. He spent all of his own money. And he spent my money that he never paid back.

Joseph Maldonado approved every single transaction. But as power of attorney, I was responsible. I approved all of the transactions through Joseph, and I approved them all with Francisco.



Anne Patrick

7/11/2007

Exhibit 4

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Friday, October 9, 2020 10:06 AM
To: texasmexicolaw@icloud.com
Subject: My Attorneys

Francisco/Brandon

I had my DHO hearing this morning and this is no different then my trial was, they had it at 7.30am and how convenient my two reps I requested was not here to help me, they took 27 good days and my phone for 30 days and nothing I say matters in here, I have been here six months and still no Orientation, no ID, no clothes, and what I have learned has been by inmates telling me. I had inmate McKenzie as a witness saying that he and others call their family and have the phone on speaker phone all the time and they dont get in trouble, but their excuse is I am High profile. This is no different then my trial people the government is always right and you have no rights at all, So it is time you all do something and you need to do it fast, I have put Ann in touch with Lutz and I can try administravtive remedies and that will not get my lost phone time back, the punishment comes first just like me being in here until I prove I am innocent.

Did the envelope ever make it to Francicos office with the forms in it? and at some point you will start seeing this is all wrong and doing as I ask because its not going to get any better. Press, Press, Press, get on TV.
Friday Oct 9th 7.50 am

Exhibit 5

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Friday, October 9, 2020 1:21 PM

To: texasmexicolaw@icloud.com

Subject: indictment

Doc Antle and his daughters and some others just got indicted, this is now going to blow up the media even more and you all got to get to Jr to see this is about mis-using the law by the former director to shut everyone down with generic tigers but them and carole and her group. you must ride this wave in the press

Exhibit 6

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Sunday, December 13, 2020 2:37 PM
To: texasmexicolaw@icloud.com
Subject: D.C.

12.13.20 2.10pm

Fran, Ann, Dillon, Rebecca

I need Rebecca to work with Fran and Ann to put this together if we are going to do this it has to be done by Thursday or we will not get anything done until after the 1st of Jan. so if everyone is willing to fly to DC to put this on Thursday take my money to get the plane tickets and such to get this done and since Dillon is willing to go also, we do NOT need this to be a circus, just a simple National Press Conference in front of the White House with Lawyers, the informant and my Husband.

Rebecca has the James connection so if she can get him to agree to do this my opinion of all of this is. Fransico needs to type up a press statement for him to look over and read it so he dont stand there and make shit up and waste our time and money. He needs to understand that he will be such a hero that the Government wont touch him for exposing this the way the DOJ is under fire right now, he needs to expose what really happened.

Fran and Jeff if both can go need to have the pizza phone proof, the vet form from the USDA, the two cell phones of mine and the 100 text between Bryant and James all in hand holding it up to the cameras showing we have the proof the Government covered the truth up. Do not waste your time if you wont do this like this because if we cant wave proof around no one is going to take you serious.

Have Dillon speak from the heart to the President.

please confirm this made it to all of you

Exhibit 7

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Wednesday, January 6, 2021 2:05 PM

To: texasmexicolaw@icloud.com

Subject: DC

1.5.20 9.50am

Let everyone know that went to DC I said thanks, and I saw the plane on channel 11 with ya all and rink, and Eric said he is not coming back without a signature so I hope he packed extra clothes, going to be a long trip. Did Trumps friend go with you? someone should be able to text him and let him know you all are there I would think.

Exhibit 8

Subject: Release
Date: Monday, October 12, 2020 at 1:55:21 PM Central Daylight Time
From: Francisco Hernandez
To: Leif Cervantes de Reinstein, Kelsey Pflieger
Attachments: RGP LLC - Appearance Release - Form.pdf

Dear Leif and Kelsey,

Because the working relationship with Jeremy and his team has been fantastic since Joe reached an agreement with them, I think best to address this directly with you to avoid any misinterpretation of ill will. **This is the third time they have asked us to sign a release. We've made it very clear that we will not sign it** and quite frankly, have not taken the time to read past the first comma in the proposed Release. Y'all might look at those first 5 words again.

The persistence, however, does give rise to a bit of concern and suspicion that there may be footage and recordings where my team was not aware was being taken and, therefore, without our consent. I hope my concern and suspicion is unfounded.

We certainly cannot consent to any video or audio recordings that were taken without our knowledge and acknowledgment. So I am taking taking the time to make that clear so there is no misunderstanding.

From: Jeremy McBride <jeremy@goodefilms.com>
Date: Sunday, October 11, 2020 at 3:49 PM
To: Francisco Hernandez <francisco@texasmexicolaw.com>
Subject: Release

Fran - attached is the review for you and Jeff and your team (not sure who else we have in the office).

Please take a moment to review and let me know if you have any questions.

Jeremy



JEREMY MCBRIDE

+1 (917) 946-5697

Exhibit 9

francisco hernandez

From: texasmexicolaw@icloud.com
Sent Date: Tuesday, March 23, 2021 8:54 AM
To: JOSEPH MALDONADO-PASSAGE (26154017)
Subject: attorney client communication privileged and confidential

fyi:

Good morning Kelsey,

I apologize because I failed to express my concerns and opinion during our conversation. I do understand you have a client to represent. And I know you understand I have a client to represent and advise.

I think it is best to defer to Brad Small who is, in fact, knowledgeable on these issues. Because I am not. In fact, I do believe Brad reached out to Jeremy once already so they may already have a dialogue.

But I am certain of one thing, these appearance releases conflict directly with clients' interests.

From: Kelsey Pfleger <KPfleger@sheppardmullin.com>
Date: Tuesday, March 23, 2021 at 12:56 AM
To: Francisco Hernandez <francisco@texasmexicolaw.com>
Cc: Jeff Hoover <jeff@cowtownlaw.com>, Phillip Hall <phillip@texasmexicolaw.com>, Eric Love <ericlove@yahoo.com>, Jeremy McBride <jeremy@goodefils.com>, Leif Cervantes de Reinstein <LReinstein@sheppardmullin.com>, Ryan Wedell <RWedell@sheppardmullin.com>
Subject: RE: Joe Amendment 2

Hi Francisco,

Thank you for speaking with me on Friday. As discussed on our call, attached please find two side letters reflecting the additional payment to Joe and corresponding necessary terms. As you will note, after discussing with RGP, we are able to offer an additional \$10,000 bonus payment on top of the originally discussed \$15,000, which we trust will make everyone happy.

We also attach an updated version of the Appearance Release, revised to address the concerns you raised regarding the form. For your convenience, we also attach a redline against the initial release provided.

Could you please arrange for execution and circulate partially executed versions of all agreements here? If on the other hand, you have any questions, I would be happy to discuss.

As we are simultaneously circulating the attached to our client, we must reserve their right to comment thereon.

Thank you,

Kelsey

Kelsey A. Pfleger
+1 310-228-2269 | direct
+1 817-881-8460 | cell
KPfleger@sheppardmullin.com | Bio

SheppardMullin
1901 Avenue of the Stars, Suite 1600
Los Angeles, CA 90067-6017

Exhibit 10

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Monday, October 12, 2020 11:51 AM
To: texasmexicolaw@icloud.com
Subject: RE: RE: Goode

well I want you to get paid and make something from this, you get me out of here and I will make sure you get something, money means nothing to me, never did, that is why I want to help people in Uganda and stuff, I told Jeremy the same thing, I dont know if he has anything to offer since Brandon is acting weird or what, I know he can help with the BOP stuff and maybe some big press confrence, he is very big in the BOP so I told him the same thing, get me out and he can be paid as I work if that is what it takes, but talk to him and see if he has any thing to offer, his appeal win rate is pretty high,
----Hernandez, Fransico on 10/12/2020 11:27 AM wrote:

>

I told him that any money to paid any of the team goes to your trust account anyway.

JOSEPH MALDONADO-PASSAGE on 10/12/2020 9:50:56 AM wrote
man, get your butt on tv and make a name for yourself, and if Rebecca wants to pay you take it Fran, Please, if your to proud to take it, take it and give it to EZ or donate it to the innocent project or something but she has made so much money off of me,

Jeremy Gordon reached out to me, I gave him your numbers
----Hernandez, Fransico on 10/12/2020 7:41 AM wrote:

>

I want to let you know that I refused to sign the release they want me to sign and the members of the team. They have not offered nor do we want any compensation for it. But they keep insisting. I didn't ask to be on the show and I only agreed to film because Eric and Anne asked me to. None of my team wants to be a movie star. We're only working for you

Exhibit 11

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Saturday, March 13, 2021 2:06 PM


To: texasmexicolaw@icloud.com

Subject: attorney/client

3.13.21 10.22am

Fran/Rebecca

Fran

 Rebecca is going to help me with the house pmt, she is suppose to put 15,500.00 in your escrow and I will tell you how to send money to owner of the house, this will take care of the house until Nov, of this year, I told her that I have no problem with you signing what ever to use the footage of the pardon stuff as long as some word in there is removed to not own you for the rest of my life or yours, as long as your comfortable with the wording go ahead and sign it please, she seems to be the only one out there helping with my bills, as soon as it hits your account this week and the papers are to your liking, sign it.

Thanks

Exhibit 12

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Thursday, February 25, 2021 4:52 PM
To: texasmexicolaw@icloud.com
Subject: RE: Attorney-client communication privileged and c

Fran. Understand he was hired and payment only promised from the book from the day he was hired forward, he is not entitled to anything in escrow or branding, thats bullshit, you and brad handle all of that and HE IS NOT TO BE INVOLVED IN ANYTHING IN ESCROW OR MY BRANDING.

----Hernandez, Fransico on 2/25/2021 9:45 AM wrote:

>

Joe, I cannot request the recording of your call with Rebecca because JP has told FMC counsel that he is the only one authorized to speak on your behalf.

Exhibit 13

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Thursday, February 25, 2021 4:50 PM

To: texasmexicolaw@icloud.com

Subject: Attorneys

2.25.21

Rebecca/Jeremy

Not sure what deals you had signed with John Phillips before he took my case but he took my case as a criminal and civil attorney and any and all information is privalaged and private that he knows or will obtain and it is not nor will it ever be accessable to you. What he did with Dons Family with you is his business but what he does with me is my business and will not be shared with you unless he serves you with some sort of suit which I do see coming. Fransico, Jeff Hoover has not nor will they sign anything giving you permission to use what you filmed with them, what Eric Love did with you is his business but he no longer has permission to speak to you on my behalf.

Good luck on your film,

Exhibit 14

francisco hernandez

From: texasmexicolaw@icloud.com
Sent Date: Thursday, May 27, 2021 1:05 PM
To: JOSEPH MALDONADO-PASSAGE (26154017)
Subject: RE: Attorney/Client

1. JP is in the middle of this. When he signed on with Jeff Lowe, he is directly in the middle. I AM NOT TRYING TO CREATE DRAMA. I'm just stating the rules. of course, if he gets you out in July like he promised you, I will yield and bow to him and all conflicts will be erased of course.
2. before you sign a deal with Jeff, you have to know what he turned over and whether it is admissible with and without Jeff Lowe's cooperation. because if he takes the 5th when JP tries to authenticate the evidence, it is not admissible. Unless he is an opposing party in some litigation. this is the general principle with very little exception.

JOSEPH MALDONADO-PASSAGE on 5/27/2021 7:35:13 AM wrote
5.26.21

YOU CAN NOT SEND THIS TO JOHN PHILLIPS AS HE CAN NOT GET IN THE MIDDLE OF THIS OR BE MADE AWARE OF THE TRADEMARK ISSUE. IT WILL BE A CONFLICT.

Brad

Fill free to forward this to Mr. Lowe. I was presented with a deal that was accepted by Mr. Lowe in order to have representation by John Phillips and that deal was.

- 1- I would give him 50% of all income of deals HE brought to the table in regards to MY trademarks.
- 2- He had to go through you as the lawyer to do contracts and all payments went to you to pay out after your percent.
- 3- He could not claim to be the tiger king
- 4- Him and Lauren had to have no ties with porn while my trademarks are being associated with them, because when I get out this is going to be about helping children and the homeless.
- 5- and the evidence he turns over had to be good enough to get me out of here.

I will NOT BUDGE from this period because

- 1- I have gave up 3 years of my life in prison that I think everyone at that zoo should have to serve as well but I have taken the complete hit so far.
 - 2- I lost my entire zoo, lifes work, animals, my house had horses put in it, the defamation of interviews admitting to breaking into my emails, house, and computers can still become an issue for Federal Crimes admitted to the Daily Beast just for publicity.
 - 3- My marraige is a wreck
 - 4- I got cheated out of saying goodbye to my own parents over this.
 - 5- I have done without while eveyone out there has made a buck off of me and my name.
 - 6- I created Tiger King and Joe Exotic years before I met anyone of them.
 - 7- It is my character that is Tiger King
 - 8- I had to sign my life away with Goode Productions to get my trademarks back because Mr. Lowe sold them to them and we have that contract.
 - 9- The contract we had at the zoo is void because he never got insurance or kept his end of the deal.
 - 10- I have NOTHING LEFT< NOTHING, my clothes have been sold, my shit has been destroyed , horses were put in my house on purpose and its time to step up to what has been done and be satisfied with what I have offered in the above because right now as sick as I stay and the truth will come out sooner or later, Fransico is paying all my bills and making sure Dillon has money to live on so I am not stressed out for cash to sell out the rest of my life and there will NOT be anyone using my trademarks to profit from while I am in here or any other way. So making 50% of what he has found is a very generous offer I would say and lets the dust clear and each move on from this or I will sit tight and wait for a new trial and when I do get one I will keep 100% of everything and if I die first Mr. Lowe can forget everything because I am staying married to Dillon so he will get the trademarks and everything as this is what my attorneys have made very secure so I am sure Dillon will not be willing to do anything with him if I dont make it through this.
- The ruff part of this for me is over, I am in a very comfortable hospital setting until I get a new trial, I thought the

francisco hernandez

deal was to help each other before Mr. Lowe and his wife end up at a medium prison themselves and trust me its not fun, it wont be a low hospital prison like I am in. So the offer is only what is stated above, the choice is either take the 50% of deals he finds and we all move past this or sit with nothing for good. Mr. Lowe is the one who lives bragging he is a millionaire and has tons of cash and mansions, why does he need to continue to take mine?

Joe Exotic

Exhibit 15

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Wednesday, February 17, 2021 4:10 PM
To: texasmexicolaw@icloud.com
Subject: lol

2.17.21 3.30pm

You know fran, he is throwing Robert Shapiro's name around that he is going to be on his team doing this, so you know how to handle this? Make him your bitch, any and all problems you see or hear going on out there with witness tampering, and problems rebecca and jeremy are causing, dump it in his lap and say this needs dealt with, and always keep me in the loop so I know to keep on him to deal with it.

Exhibit 16

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Wednesday, February 10, 2021 4:06 PM
To: texasmexicolaw@icloud.com
Subject: RE: attorney client communication privileged and c

2.10.21

the papers I signed says his firm will take me all the way through the appeal, rule 33, 2255 and a new trial if it all comes to that, and he will be compensated out of my share of the proceeds from my book, so he is going to have to wait for money and he seemed fine with that, so no he is a hired lawyer so now he has to deliver what he promises and he has to listen to what I want done, and all civil suits was oklahoma 45% Florida 35% of what he wins.
so lets make him work.

I need to find that flash drive for my quick books and I need a list of what bill and kyle has turned over. in detail
----Hernandez, Fransico on 2/10/2021 2:48 PM wrote:

>

thoughts from meeting:

1. seems confident and competent. sounds serious. I'm sure he has figured how to make money and great for him.
2. if I heard correctly, he says will take over the Rule 33. but said "he does not get into the criminal part." well ok, I guess he has someone in his firm for that. so I will pause what we are doing until I meet with him and give him what he needs. please make sure the work continues so it will be ready as close to the time when the appeal is done.
3. his secretary has him thinking I was recording the conversation from my laptop. I told him that is not a great way to start our relationship and he is welcome to take my laptop and have it examined for anything deleted.
4. I do not mind if he wants to take the lead on the compassionate release petition and the rule 33. I just need him to tell you and me so I can work on your other matters.
5. I also think he did not like that the book money is payable to the trust account. I dont see why it matters.
6. I just offered to take him to dinner tonight and organize.

Exhibit 17

francisco hernandez

From: texasmexicolaw@icloud.com
Sent Date: Tuesday, April 27, 2021 3:57 PM
To: JOSEPH MALDONADO-PASSAGE (26154017)
Subject: RE: Dillon

will do.

it is 3:57 pm on 4/27

JOSEPH MALDONADO-PASSAGE on 4/27/2021 3:37:42 PM wrote
4.27.21

Can you send Dillon 3500.00 for wed to do him for May please,

Exhibit 18

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Thursday, January 7, 2021 2:21 PM

To: texasmexicolaw@icloud.com

Subject: Well

1.7.20 12noon

Well, they tested everyone yesterday for COVID on this floor and today they are moving us to the GYM which means we more then likely are all positive but they wont even tell you the truth about your own health so I am not sure what the deal is, so I will be in touch when I can and you know my rules about my health.

Fransico, you are to pay the owner of the house 10,500.00 so the rest of 12 months are done and YOU make sure it is paid.

Dillon is to always get 1500.00 on the 13th of each month, and 1000.00 around the 25th of each month, if I aint around to do this. he will have to learn to budget money, NO ONE has the right to change my wishes for this,

Thanks for all you all have done,

Hun I love you so very much,

Confirm you got this so there is a record of it please,

Exhibit 19

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Thursday, October 15, 2020 4:07 PM

To: texasmexicolaw@icloud.com

Subject: Dillon

So you and Fran are on the same page this is to you both, Fran has been asked to take the money from escrow and get your car tags which is around 2600.00 so you can get moved so we can get on with a house, Fran if you could overnight them to him before I am paying for tickets also, they are Over a month past due. I had asked Ann to do this two weeks ago

Exhibit 20

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Thursday, October 15, 2020 10:07 PM
To: texasmexicolaw@icloud.com
Subject: Budget

Dillon and Fran

So we are on the same page, with what I think fran has to work with Dillon I have to pay Brad 10k, Fran will explain why, it is to protect us and my estate if something happens to me, and Fran what I am thinking is going to be needed in Texas once he talks to the people about the house if the house works out is going to be around 16k to do it the way I want, which will leave not much there until Dec, or I come home which better be before Dec or I am going to raise all kinds of hell, and once a house deal is done I will work a new budget with Dillon and Fran know, Dillon needs to get to texas soon or we are going to just keep speeding money for nothing. I have been waiting a long time to get money spent on rent to actually go to our house instead of just in someones pocket, looking forward to finally having something. once he is in texas I will talk with Dillon to see what we do on the house and then what he needs to fly to florida and rent a uhaul.

Thanks Fran for all you do for us
I love you Dillon

Exhibit 21

francisco hernandez

From: texasmexicolaw@icloud.com
Sent Date: Saturday, February 27, 2021 2:22 PM
To: JOSEPH MALDONADO-PASSAGE (26154017)
Subject: RE: Dillon

2:20 PM at February 27. I will. I don't know how to send them Western Union but EZ knows how and he says he will do it first thing Monday morning

JOSEPH MALDONADO-PASSAGE on 2/27/2021 2:20:48 PM wrote
please let me know when you send Donna the money for food for my cats and whos name sent if please.
2.27.21

—Hernandez, Fransico on 2/27/2021 8:04 AM wrote:

>

4:36 PM on February 26. I will not pull the trigger unless you give me a specific instruction.

JOSEPH MALDONADO-PASSAGE on 2/26/2021 4:34:52 PM wrote
dont repo it yet, I was asking how hard it will be to do if we get a divorce?

2.26.21

—Hernandez, Fransico on 2/26/2021 3:56 PM wrote:

>

3:05 pm 2/26

Got it. I'll get the car repoed. Do not tell anyone so he will not hide it

JOSEPH MALDONADO-PASSAGE on 2/26/2021 3:05:54 PM wrote
2.27.21
Fran

First thing, do not pay the house payment..

Second, how hard is it for you to repo that car?

Call the lawyer in Austin and tell him I am not responsible for his debt to dillon that he needs to work that out with him.

be prepared to file for me a divorce

Exhibit 22

EVANNA SPRINGER COMPANY

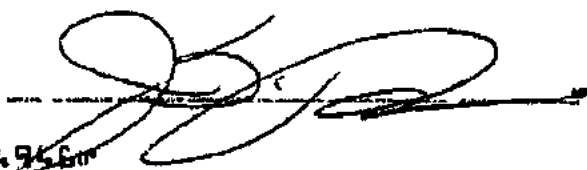
LAW OFFICE OF JEFF S. HOOVER
OPERATING ACCOUNT
 800 WEST WEATHERFORD STREET
 FORT WORTH, TX 76102

6439
 25-MAY-1130
 21428
 CHECK NUMBER

DATE 7.9.21

PAY TO THE ORDER OF Joseph Maldonado - Passage Trust \$ 1,500⁰⁰
One thousand five hundred & no/100 DOLLARS

FOR _____



⑆006439⑆ ⑆113010547⑆ 51496968⑆

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EVANNA SPRINGER

H4-E510-01-1
300 W SEVENTH ST
FORT WORTH, TX 76102-9957

Exhibit 23

Dillon Passage

Francisco Hernandez

I'm not even really in contact with my attorneys anymore because I'm not avidly pursuing the divorce. I haven't spoken to them in over a month haha Hope everything is good with you Fran and that you can get a bit of peace and less stress

Anne tells me you are doing very well. Good for you.

I am 🙌 thank you, just paid rent for a full year at the new house. Only took me getting away from Joe to start making good money haha it feels nice

1/28/22, 8:32 AM

Hey Fran, I'm sorry to hear about your pops. I hope you are doing okay. Much love

Thank you brother. I appreciate you.

2/2/22, 1:58 PM

Dillon, may I bother you to confirm through a receipt, text, email, anything convenient for you for the 15K payment? I dont know where the receipt ended up. Just in case Joe doubts that I paid it

They never gave me a receipt but I can confirm that you paid me the 15k

Thank you

2/2/22, 3:04 PM

Do you remember when you brought the car up to Fort Worth?

September 23

Thank you. Sorry to keep bothering you. Just playing prevent defense

Today, 2:56 PM

Sorry to bother you again. Do you have a text or email that shows Joe knew and approved sale of the gun? Just in case. B/c I know JP is making hell for everybody

No because I wasn't going up there to sell the gun initially. I was just going to give it to you guys because I knew Jeff wanted it but then he gave me

the \$1500 for it. But Joe knew I was going to give it to you guys. Also he had sold the gun previously to this guy Mike in Louisiana but I held onto it. Then mike died.

Thank you

Delivered

Exhibit 24

I forgot to ask. Nathan (landlord) messaged me

Anne Patrick

Francisco Hernandez

yesterday about rent payment. He's being nice but what should I tell him?

AS SOON AS WE GET A CHECK IN YOUR CAN PAY THIS MONTHS. I WANT YOU TO GET THE GUN FROM DILLON FOR IT THOUGH

I WILL TELL DILLON

I can send Jeff's 1500 to Nathan if you tell Dillon to send the gun? I can give dillon a fedex account

OK I WILL TELL DILLON CAN YOU FEDFEX A GUN AND HOLSTER

Fedex account: under Jose Natera. My office address. Account number:

OK I WILL SEND IT TO HIM

7/6/21, 4:30 PM

Hi Anne, I told Dillon I need a green light from you and/or Joe before I send the 4500 to Nathan for rent

NOOOO 4500 WHERE DID THAT COME FROM. IT WAS 1500 THESE 2 ARE MAKING ME CRAZY SO

THAT IS WHY DILLON WAS CALLING. I HAD TO SEND DILLON 100 YESTERDAY AND I TOLD HIM TO GO GET A JOB/ ALSO HE WAS SUPPOSE TO COME UP THERE TODAY WITH THE GUN AND HOLSTER AND HE DIDN'T DO THAT EITHER RIGHT EVEN AFTER I TOLD HIM YOU WILL GIVE HIM 500 FOR THE HOLSTER

He was up here. Give me a chance to call you and give you the rundown.

Before you yell at him

I AM ALREADY YELLING AT JOSEPH 🤔

I only told Dillan that I need a confirmation from you and or Joe

I AM ASKING JOSEPH CUZ HE JUST SENT ME A MESSAGE THAT DILLON'S BF NEEDS TO START PAYING BILLS 🤔

JOSEPH SAYS WE ARE JUST PAYING JULY 1500. I WILL DEAL WITH DILLON.; DID HE BRING YOU THE GUN AND HOLSTER

7/7/21, 7:34 AM

He did bring to Jeff. i venmo'd 1500 to dillon. I can use the other 500 toward the rent? Or will dillon pay it? No rush just let me know what to do

DID YOU TELL DILLON IT WAS FOR RENT OR JUST FOR HIMSELF. HE WILL NEVER PAY RENT THAT MONEY FOR THE GUN FOR RENT AND HE NEW THAT

Exhibit 25

Joseph Maldonado-Passage

Francisco Hernandez

Yesterday, 4:59 PM

Do you have my gun and any coats

No. Remember Jeff bought the gun for 2k and I have not seen any coats

Ok

Dillon is going live at 7. You might text him and advise him not to cause problems with me and this prison. It could really look bad in court. Might to be very careful with even going live and saying shit that ain't true. There are no contract in his name and you have records of his payments



Every payment is documented

Please remind him of this. And PayPal shoes before you got involved

Exhibit 26

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Thursday, August 12, 2021 9:51 AM
To: texasmexicolaw@icloud.com
Subject: attorney/client

8.12.21

Fran/Ann

Fran

I need you to type up a living will for me please, Ann has all of his information, name, social security number ect to protect everything incase something was to happen that Dillon gets nothing from me please and mail it to me and I will get it notarized and then you can mail him a copy of it. thank God you bought my gun. or he would have sold it also.

thank you.

Ann

Dont forget, Johnny in Huron SD, for an attorney please,

Exhibit 27

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Wednesday, August 25, 2021 2:38 PM
To: texasmexicolaw@icloud.com
Subject: divorce

Fran/Ann

You can draw up divorce papers here is what I will agree to

release the lein on the car
give him 15k within a year with no time on payment

he must agree to
never having any contact with this prison or anywhere I am being held
get my stuff back from his brother and anyone else he gave my personal belongings to,
everything must be giving to Fran
the lacy drive to fran/ no copies made and nothing can ever be used that is on it or given to anyone else ie, press,
movie people etc.
Public appology saying- on his platform, Live and it must stay there a month, I paid his rent, insurance, car
payments, bail money, food and utilites for over 2 and half years while I was tied to chairs, in solitary confinement
and trying to just prove I am innocent and the car he has now was paid in full for a birthday present last year, and
that during the 2 and half years, he lied as to where he lived, worked and blocked my phone from calling him
when he didnt want to be bothered while partying and out trippin on mushrooms.

I am tired of being the bad guy for all of these people, its time they start owning up to what they do wrong, Allen
has admitted to perjury Dillon can own up to what he has done,

I will not budge from this

Exhibit 28

francisco hernandez

From: texasmexicolaw@icloud.com
Sent Date: Tuesday, August 4, 2020 11:58 AM
To: JOSEPH MALDONADO-PASSAGE (26154017)
Subject: RE: dillon

my thought is to put the title in his name with you as "lien holder." that way, he is responsible for everything and you have a lien.

I just spoke with Ann. dont want to throw any rocks but I dont know what JT is talking about 100K. if you spend 30K on a car, that will leave only 10-15K in your account. I have every penny accounted for and can mail it to you. but if JT has made 100K and is sending to your account, that would work for sure.

JOSEPH MALDONADO-PASSAGE on 8/4/2020 7:20:29 AM wrote
you are going to think I am just bat shit crazy, but its going to be dillons 25th birthday and he assures me he is going to be here through this until I get home, so Ann found a car he is wanting and there is only one they can find, she was suppose to see what a cash price was and since he has an address in texas I asked ann to find out which would be cheaper to tag it in florida or texas or how the sales tax works like that, anyway what I would like someone in your office to do for me is do the paperwork with the dealer ship and have the title done (Dillon Passage or Joseph Maldonado Passage) so neither would have to do probate if something happens to one or the other, but the main thing was to do the paper work so I am sure the title is done like that and you pay them direct so all he has to do is go show ID, insurance and pick it up,
is this possible?

I sent Ann a long email for you about the legal papers you sent me about the contracts and stuff with jeff thank you so much fran

-----Hernandez, Fransico on 8/3/2020 3:49 PM wrote:

>

I got your emails from friday to yesterday. I've printed and emailed to Eric and Anne. I just went over them with Anne on the phone also. we will be on the phone with you tomorrow at 2.

JOSEPH MALDONADO-PASSAGE on 8/3/2020 7:05:20 AM wrote

I am putting two brown envelopes in the mail to you tonight, #37 and #38 one is fan mail and one is the court papers you sent me, I made notes and sent them back to you as I dont want them laying around in here with Jeffs crazy accusations,

be aware the performance contract was on my computer and should be on a backup hardrive you all have and if you search contract it should come up or in documents it should be there also, I did not keep much in the document file so it should not be hard to find, understand the only performance contract I had with him was to use the park for a campaign location and the back gift shop to raise money and in turn he could use my animals for free for exhibit as long as he paid to take care of them and I would never owe boarding, it had nothing to do with tiger king or my likeness so he had to make that up himself, but the orginal contract was on my computer.

2- he never paid a dime for the zoo, he conned his way on the title of the land pretending to be an investor and a millionaire and to only hide it from carole, he never paid anything for it like lauren said under oath and they have no receipts to prove they paid any of the bills like she said because it never happened.

3- He had to have made up the email accounts because I have only had two in my life and that is joe_exotic@yahoo.com and joeexoticv@gmail.com so it would be nice to look up the ip addresses and dates they were opened if he claims I left a list laying around.

Exhibit 29

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Monday, November 16, 2020 7:20 AM
To: texasmexicolaw@icloud.com
Subject: RE: RE: Dillon

Fran,

You didnt sign on to take care of my whole family and you have done more than you even had to already, Once you find out how much his bond is or if he even has one, let him set a few days and think about what he has in life and what he could have thrown away and then would you all get him out and I will make it good some how some way. He thinks he is tough but he will not ever make it through what I have been through in here. He has a drinking problem and he needs to admit it and get some help or just stop, he never was like this when I was home it must be part of the seperation issues but thats still no excuse. So if they allow bail if you have eric get him out in a few days, take it out of what Max sends you.

This is why I have been so adamant to get all that stuff going with Ann and Ez so your escrow was never this short.

Please let me know what you all find out

Thank you sir

—Hernandez, Fransico on 11/15/2020 2:35 PM wrote:

>

I have easy working on the impound. Thank goodness we have the title with you as a lienholder so we can get it out without Dillan's authorization

JOSEPH MALDONADO-PASSAGE on 11/15/2020 1:07:23 PM wrote
Fran, Eric, Ann

I just got Anns message about Dillon, he told me last night he was not going to drink.
I need someone to find out if it is even possible for someone to get the car out so that bill is not going up by the day.

Has he seen a judge?

If so is there a bond?

How much?

Did They take his drivers license away?

I can put in a few calls for money to get him out, but he has got to get this partying under control before he kills someone or himself and I wont be able to get him out of trouble. I was hoping buying a house and getting him settled down close to family would solve that problem and he would settle down until you got me home.

Let me know as soon as you all know something please so I know what I need.

Exhibit 30

Ann

9-30-21

Hey you, IF you talk to your oldest Grandson. Tell Him I love him more than anything and I would be Awesome to get a letter, he should know more than anyone how important they are. And what not to say, Have not heard from Seth. So I'm saying that's a waste of time so I'm going to focus on JR unless he proves drugs. Mean more than me + his son. I write him almost daily. Make sure sis is getting them and sending his,

would be nice if John P or Amy would send a letter giving some hope on something. IF FRAN Buys Dillon's Car cheap, tell him to sell it or AS FAR AS I CARE you can have it IF you want a stick shift "And you dont give it back to Dillon" OR IF you dont fly JR dad to DFW and give it to his parents, I dont see selling it for more than 18K or less and by time you pay Dillon 10-12K it aint worth the Hassel,

Once again Dillon will come out ahead. So Fuck Him. But IF the CAR is NOT TRASHED IF you can get it for 10K + sell it for 15-18K that would pay Rent on a nice house for nearly 1 year. But in his DUI video the Cop ASK what happen to the passenger mirror and Dillon didnt know So he wrecked it drunk,

Exhibit 31

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Tuesday, January 5, 2021 6:49 AM
To: texasmexicolaw@icloud.com
Subject: RE: RE: DC

well if you get this friend of Trumps to go along, let me know, and let him know I have now lost both parents over corrupt DOJ people and I would owe him my life if he would make a call on my behalf to his friend to just make this right and sign it for me, I will spend the next four years promoting 2024

1.4.20 9pm

---Hernandez, Fransico on 1/4/2021 3:29 PM wrote:

>

Just FYI, I sent this to the group just so no power struggle starts brewing.

Good morning Folks, I'm back in the country from visiting dad. Teresa, I got an email from Joe asking if there is some sort of power struggle going on about the trip to DC. I want to be perfectly perfectly clear about this. The reason I've got my friend offer his jet is because we could not get commercial airline tickets because they were sold out. This has nothing to do with Jim. We also found That national Airport requires a co-pilot which takes up one of the seats. Then, Joe asked that we take Reinke. I agree wholeheartedly. But that took another seat away. I am also waiting for a response from an extremely powerful inside friend of Donald Trump to respond if he would like to go. He is a big Joe exotic fan and has asked me for T-shirts several times. At one point he considered allowing us to go in his own jet. That was months ago. So that takes away another available seat. So, when you talk or email with Joe the two of you can decide which one of us gets kicked off the airplane. I'll be the first to volunteer. Of course, let's all keep in mind that the \$8000 expenses are being covered by Mr. Hoover and I. I completely understand the discovery declined. And quite frankly so did others. I hope this does not come across wrong I just have to get it out.

10:12 am 1/4

JOSEPH MALDONADO-PASSAGE on 1/4/2021 9:51:03 AM wrote
1.3.20 9.15am

So why all of a sudden is the plane to full for Jim Rath?
Just curious if we have another power struggle going on within this team?????

Exhibit 32

TEXAS CERTIFICATE OF TITLE

TEXAS DEPARTMENT OF MOTOR VEHICLES



155001436

VEHICLE IDENTIFICATION NUMBER
2C3CDZBT1LH191638

YEAR MODEL
2020

MAKE OF VEHICLE
DODG

BODY STYLE
2D

TITLE/DOCUMENT NUMBER

DATE TITLE ISSUED

22030444129160714 11/04/2020

MODEL

MFG. CAPACITY
IN TONS

WEIGHT

LICENSE NUMBER

CHA

4200

NNR9052

PREVIOUS OWNER

ODOMETER READING

GULF CHRYSLER DODGE JEEP FOLEY AL

12

OWNER

REMARK(S)

**DILLON JACOB PASSAGE
1 UTE LANE
BELTON, TX 76513**

ACTUAL MILEAGE

X *Dillon Passage*
SIGNATURE OF OWNER OR AGENT MUST BE IN INK

UNLESS OTHERWISE AUTHORIZED BY LAW, IT IS A VIOLATION OF STATE LAW TO SIGN THE NAME OF ANOTHER PERSON ON A CERTIFICATE OF TITLE OR OTHERWISE GIVE FALSE INFORMATION ON A CERTIFICATE OF TITLE.

DATE OF LIEN

1ST LIENHOLDER

10/27/2020

**JOSEPH ALLEN MALDONADO-PASSAGE
800 WEST WEATHERFORD STREET
FORT WORTH, TX 76102**

1ST LIEN RELEASED

DATE

BY

AUTHORIZED AGENT

DATE OF LIEN

2ND LIENHOLDER

2ND LIEN RELEASED

DATE

BY

AUTHORIZED AGENT

DATE OF LIEN

3RD LIENHOLDER

3RD LIEN RELEASED

DATE

BY

AUTHORIZED AGENT

IT IS HEREBY CERTIFIED THAT THE PERSON HEREIN NAMED IS THE OWNER OF THE VEHICLE DESCRIBED ABOVE WHICH IS SUBJECT TO THE ABOVE LIENS.

RIGHTS OF SURVIVORSHIP AGREEMENT

WE, THE MARRIED PERSONS WHOSE SIGNATURES APPEAR HEREIN, HEREBY AGREE THAT THE OWNERSHIP OF THE VEHICLE DESCRIBED ON THIS CERTIFICATE OF TITLE SHALL FROM THIS DAY FORWARD BE HELD JOINTLY, AND IN THE EVENT OF DEATH OF ANY OF THE PERSONS NAMED IN THE AGREEMENT, THE OWNERSHIP OF THE VEHICLE SHALL VEST IN THE SURVIVOR(S).

SIGNATURE

DATE

SIGNATURE

DATE

SIGNATURE

DATE

Exhibit 33

Exhibit 34

FRAN/ANN

10-13-21

I just got off the phone with Ann.
And it got more confused then when I
Started.

So to be clear and I would like to
know if you even get this letter.
you both believe in God right so let
me tell you how me + God have a relationship
together.

Money is evil, it ruined my family,
you see it ruined Dillon because all
anyone can do is fight over it and no one
ever gets enough. Look at Carole Baskin.
Last month I had 40⁰⁰ on my commissary,
today there is \$3,317.39 and I have no
clue where it keeps coming from. So I
do things for people, always have and
I always will, that's why making money
has always been easy for me, God gives it
to me because he watches what I do with it,
yes Seth has a 2 year old son - John has
a 16 year old son. I was engaged to Kim
when I was 23 years old. People discover
who they are at different times. Some
are gay and some are confused. Right now
who knows which one of these two if either
one will make it a year from now,

So it might not be either one, I may die in here or I might get out and really find someone special with NO courage.

So until that time comes I am going to continue to help them both and anyone else that needs help along the way, I love John very much but I know the real John and I'm the one who always takes the crap in the press. I have not met Seth but I've spent hours talking to him and his dad,

I am paying Fran for the car after Nov 17 is over I want the wrap left on the car and I'm letting Seth drive it until I get out to deal with it or I die first!

Ann - I texted you once and told you I had never been in such a mentally abusive relationship like I was with John. I know you like him but when he was being an ass I met Seth, he has never asked for anything the apt was my idea so you know me and keeping my word, so let's see which one holds up and supports Joe through this and we will go from there.

you will keep forgetting money means nothing to me, I will work for my

Money if I Have to, This CAR means nothing to me, But I Have AN Amazing Plan for it if I get out,

That Book Means nothing to me, The truth that is coming in Tiger King 2 is what will get me out of here, and that is what I wish Everyone would put your effort towards is making sure Every Politician sees it, Allen Has put his ass on the line to tell the truth and get me out, we need Every Reporter and Radio Host to talk ABOUT it. I need lawyers to get my Rights to Speak to the media, my Rights to Be treated like everyone else in here.

This is my last shot at walking Free, Do not get side tracked worrying about which Boy be is helping.

After paying JP there is \$12,000⁰⁰ in my trust and a Book part coming in Nov. again so Ann Please go find you a nice House to Rent and take it out of my trust AS PAY FOR Doing my shit the way I want so you dont think its a handout. I need the deductions, and get Brad to Find out what the hell is going on with the weed so we can do more,

I need William Morris in place By Nov,

Put Joe Exotic on the front
fenders of the car please

So I dont miss the big stuff,

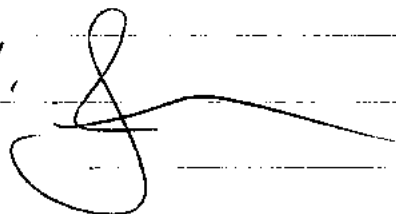
I've live Hell like you could Ever.
I imagine, Tied to chairs, stabbed, assaulted,
And locked up like an animal for the
past 3 years.

Please let me be me and have control
over my life, let me help who I want
and keep me informed of what you do and
what needs done, you are my attorney
and power of attorney, I own myself
and I make my own decisions that effect
my life, John Phillips forgets this also,

I appreciate all you do, I really do, But its
not fair when no one tells me or ask me.
Any thing first, make this place follow the
law with legal calls, so we can talk.

I have met some amazing recording artist
since being here, there is so much to do + money to
make out there, I need you to focus on getting
everyone to raise hell when they see the truth.

I love you both.



SO WE ARE CLEAR.
Andy 500 on the 1st & 15th 1500 on book fines on the 1st
Seth 1500 only 1 time 1st week of the month.
ANN - go get a house.

Exhibit 35

Exhibit 36

Wire Transfer Confirmation Business Accounts

Print

You have successfully submitted your transaction on 08/10/2020 at 12:50 pm Pacific Time.

View your wire transfer activity or make another wire transfer

Confirmation number OW00000902574430

Send to Gulf chrysler dodge ...571

From account TRUST ...0917 Available balance = \$103,397.96

Frequency One-time - send now

Wire amount sent \$10,000.00

Fees \$30.00

Taxes Local taxes may apply

Total from account **\$10,030.00**

Send on 08/10/2020

Deliver by 08/10/2020

Description 15937

*Dillon
New Car*

View your wire transfer activity or make another wire transfer

Wire Transfer Services

Outgoing Wire Transfer Request



Today's Date:	Wells Fargo Reference Number:		
08/13/2020	FW0068469226707386		
Banker Name:	Officer/Portfolio Number:		
HECTOR C. CARRERA	A3472		
Banker Phone:	Branch Number:	Banker AU:	Banker MAC:
817/348-9290	07969	0068469	T9642-010

Outgoing wires can only be sent for Wells Fargo customers. Provide the Customer Copy to the customer ensuring you give them the Wire Transfer Agreement on pages 3 and 4. Note: Wells Fargo Wire Transfer Services will route wires based on correspondent banking relationships. See the Wire Transfer Information for explanations of the Mexican CLABE number, the SWIFT BIC, the International Routing Code ("IRC"), Indian Financial System Code (IFSC) and the International Bank Account Number ("IBAN").

Originator's Information

Originator Name:	Street Address:			
FRANCISCO HERNANDEZ JR	800 W WEATHERFORD ST			
Primary ID Type:	Primary ID Description:	Address Line 2:		
DLIC	09976596			
Primary ID St/Ctry/Prov:	Primary ID Issue Date:	Primary ID Expiration Date:	Address Line 3:	
TX	02/19/2020	10/09/2021		
Secondary ID Type:	Secondary ID Description:	City:	State:	
TOKN	Token ID	FORT WORTH	TX	
Secondary ID State/Country:	Secondary ID Issue Date:	Secondary ID Expiration Date:	ZIP/Postal Code:	Country:
			76102-1946	US
Account Name:	Home Phone:		Business Phone:	
FRANCISCO HERNANDEZ, ATTORNEY			817/335-2331	

Wire Amount and Source of Funds

Create AU:	Amount (US Dollars):	Debit Wells Fargo Account:	Bank/COID:
0068469	\$15,500.00	2858190917	00808

Beneficiary/Recipient Information (This is the ultimate recipient of the wire transfer funds)

Beneficiary/Recipient Name:	Name/Address Line 1:
GULF CDJ INC	
Beneficiary Account Number/IBAN (Foreign)/CLABE (Mexico):	Name/Address Line 2:
1004571	
Purpose of Funds:	Name/Address Line 3:
DILLON PASSAGE	HATTIESBURG, MS, US
Additional Instructions:	Beneficiary Phone Number:

*Dillon's
B-Day Gift
challenged*

Customer Copy

Beneficiary Bank (This is the financial institution where the beneficiary maintains their account.)

ABA/RTN	SWIFT/BIC:	Beneficiary Bank Name:
065303360		THE FIRST, A NATIONAL BANKING ASSOC
Beneficiary Bank Address:	City:	State:
	HATTIESBURG	MS

Additional Instructions:

Wire Fees

Wells Fargo wire transfer fees will be charged to the Originator's Debit Account. Wells Fargo Wire Transfer Fees are disclosed in your most recent Fee and Information Schedule and related amendments and, if applicable, on the Wells Fargo Combined Disclosure for Outgoing Consumer International Wires. Additional fees from intermediary and beneficiary banks may be charged to international transactions. My signature here indicates agreement to all of the information on this Outgoing Wire Transfer Request and to the terms and conditions of this request. Wells Fargo is authorized to rely on the information on this Request in making the requested funds transfer.

Customer Signature

Originator Name

FRANCISCO HERNANDEZ JR

Originator Signature



- Submit manually
- Signature not required

Date:

08/13/2020

Customer Copy

Exhibit 37

francisco hernandez

From: texasmexicolaw@icloud.com
Sent Date: Monday, July 20, 2020 4:20 PM
To: JOSEPH MALDONADO-PASSAGE (26154017)
Subject: RE: thur noon

about 50. thank you for confirming the 24th. got two envelopes from you today. sent letter to Chas. some fan mail and two letters to the team. I also print and send these emails to them.

JOSEPH MALDONADO-PASSAGE on 7/20/2020 3:35:59 PM wrote
hey, can you tell me what is in escrow, and dont forget Dillon on the 24th 3000.00 incase I am out of touch for any reason.

wait until you all see what was passed up for the only reason to blame me.

-----Hernandez, Fransico on 7/20/2020 9:00 AM wrote:

>

I agree, the in person visit time is critical to strategize. Ann will protect your privacy and no one will have access to anything other than relevant content.

JOSEPH MALDONADO-PASSAGE on 7/18/2020 12:36:26 PM wrote

I sent the dillon stuff to eric, I was honest about it,

have we gotten anykind of political person found to say this endangred species act with generic tigers is bullshit? That is what I was praying we could get Don Jr's attention about or a congressman, if you read over all the testimony they counterdictted themselves everyone needed a permit and neutering and spading was against the law and then its ok for carole because its vet work, but not ok for my vet just hers. I am just worn out from all of this not being able to sit and talk to my own legal team without being monitored, I want to help fight my own case this time,

I appreciate all you do, but you need to ask ann about my email about my phones, things that were deleted over the years has nothing to do with any of this but my life was private and needs to stay that way, to many people are selling out to film people to know to much, and the only thing that is important is Jeff, james, allen, marc text messages.

have a good saturday

-----Hernandez, Fransico on 7/17/2020 2:49 PM wrote:

>

we will take superior care of the hard rives. we have the right guy. protected by attorney client privilege. I agree with you about trusting people. you were betrayed by some of the ones you trusted the most.

we are working on the Dillon Project. would you send me in your own words, the explosive issues you want me to include. do not try to write lawyerly. write regally, like a Tiger King.

JOSEPH MALDONADO-PASSAGE on 7/17/2020 11:07:28 AM wrote

you have 4 more large envelopes coming tomorrow, LOL, my hands are the shape of this pen. I pray this works out, I just want to go home, I am looking forward to you all seeing my phones, but Fran, be very and I mean very careful who you let just download them and have free access to them cause my whole private life is there and the last text I got from Travis is still there. I have a hard time trusting anyone right now with rebecca offering so much money to people and JT and MIKE always wanting to bow down to her

-----Hernandez, Fransico on 7/16/2020 4:19 PM wrote:

>

got it. we are ready for the envelopes. 200 letters going out to fans who's mail was rejected. all of your responses will be mailed by Saturday mail. we got three confidential folks working on it. Isai was up all night and loved every minute of it. he got COVID so we sent him home to work on Tiger case.

Exhibit 38

Date	Description	Memo	Deposit	Withdrawl	Change	Balance
5/14/2020	Balance brought Forward	Tim Shiner	\$50,000.00		\$50,000.00	\$50,000.00
5/26/2020	Dillon	WF wire Dillon		\$3,000.00	-\$3,000.00	\$47,000.00
5/26/2020	Dillon	WF Wire Reject	\$3,000.00		\$3,000.00	\$50,000.00
5/27/2020	Venmo	Dillon		\$500.00	-\$500.00	\$49,500.00
5/27/2020	Venmo	Dillon Passage		\$500.00	-\$500.00	\$49,000.00
5/28/2020	Venmo	Dillon Passage		\$1,000.00	-\$1,000.00	\$48,000.00
5/29/2020	Venmo	Dillon Passage		\$1,000.00	-\$1,000.00	\$47,000.00
6/4/2020	William Taylor Fees	legal research and memo for Joe on BOP lawsuits and civil suit in OK		\$3,325.00	-\$3,325.00	\$43,675.00
6/22/2020	Tim Shiner	Trust BBVA/PNC 5881	\$7,500.00		\$7,500.00	\$51,175.00
6/25/2020	District Court	court costs payment for Joe		\$1,125.00	-\$1,125.00	\$50,050.00
6/29/2020	Dillon	First national bank		\$3,030.00	-\$3,030.00	\$47,020.00
6/30/2020	Explicit Wear	O'dain	\$1,300.00		\$1,300.00	\$48,320.00
7/14/2020	Dillon	Zelle		\$500.00	-\$500.00	\$47,820.00
7/14/2020	Dillon	Zelle reject	\$500.00		\$500.00	\$48,320.00
7/14/2020	Venmo	Dillon Passage		\$500.00	-\$500.00	\$47,820.00
7/15/2020	Tim Shinner	WF trust cash deposit	\$2,500.00		\$2,500.00	\$50,320.00
7/17/2020	Venmo	Isai commissary reimbursement		\$500.00	-\$500.00	\$49,820.00
7/17/2020	Venmo	Isai commissary reimbursement		\$225.00	-\$225.00	\$49,595.00
7/21/2020	Dillon wire	Dillon Passage		\$3,030.00	-\$3,030.00	\$46,565.00
8/10/2020	New Car	Gulf cdj		\$10,030.00	-\$10,030.00	\$36,535.00
8/13/2020	Car	Gulf cdj		\$15,530.00	-\$15,530.00	\$21,005.00
8/14/2020	zelle	dillon		\$500.00	-\$500.00	\$20,505.00
8/14/2020	zelle	dillon reversed	\$500.00		\$500.00	\$21,005.00
8/18/2020	transfer of trust funds from WF to BBVA IOLTA/Joe Trust	Wells fargo to BBVA	\$10,000.00		\$10,000.00	\$31,005.00
8/19/2020	transfer of trust funds from WF to BBVA IOLTA/Joe Trust	Wells fargo to BBVA	\$7,490.00		\$7,490.00	\$38,495.00

Date	Description	Memo	Deposit	Withdrawl	Change	Balance
8/20/2020	paypal contribution	transfer	\$225.18		\$225.18	\$38,720.18
8/25/2020	Wire Transfer	Dillon Passage		\$2,400.00	-\$2,400.00	\$36,320.18
9/7/2020	Venmo	Dillon Passage		\$300.00	-\$300.00	\$36,020.18
9/14/2020	Darryl Adams-2292402520	Western union		\$188.95	-\$188.95	\$35,831.23
9/14/2020	Venmo	Dillon Passage		\$300.00	-\$300.00	\$35,531.23
9/14/2020	Bank of America-Deposit	anne patrick reimbursement		\$2,000.00	-\$2,000.00	\$33,531.23
9/14/2020	Isai hernandez	joe's property taxes		\$500.00	-\$500.00	\$33,031.23
9/14/2020	Darryl Adams-0416652232	Western union		\$309.95	-\$309.95	\$32,721.28
9/16/2020	Darryl Adams-1981509320	Western union		\$309.95	-\$309.95	\$32,411.33
9/17/2020	Venmo	Dillon Passage		\$500.00	-\$500.00	\$31,911.33
9/18/2020	Action Figure	Todd Jara	\$234.05		\$234.05	\$32,145.38
9/23/2020	Darryl Adam-1981509320	Western union		\$249.95	-\$249.95	\$31,895.43
9/23/2020	Property Taxes	Tarrant County		\$100.00	-\$100.00	\$31,795.43
9/24/2020	Venmo	Dillon Passage		\$2,000.00	-\$2,000.00	\$29,795.43
9/25/2020	Paypal	BBVA	\$42.42		\$42.42	\$29,837.85
9/28/2020	Paypal	BBVA	\$91.04		\$91.04	\$29,928.89
9/29/2020	Paypal	BBVA	\$287.70		\$287.70	\$30,216.59
9/29/2020	reimbursement DC ticket	Eric Love		\$774.00	-\$774.00	\$29,442.59
9/30/2020	attendance required by Joe	McAllen Trump Event		\$10,000.00	-\$10,000.00	\$19,442.59
10/1/2020	reimbursement DC ticket	Patrick		\$1,000.00	-\$1,000.00	\$18,442.59
10/2/2020	Paypal	BBVA	\$115.62		\$115.62	\$18,558.21
10/6/2020	conveyor media	Wells fargo to BBVA	\$5,000.00		\$5,000.00	\$23,558.21
10/6/2020	reimbursement	Patrick		\$1,000.00	-\$1,000.00	\$22,558.21
10/7/2020	paypal contribution	BBVA	\$48.25		\$48.25	\$22,606.46
10/8/2020	William Taylor Fees	WT research on lawsuits		\$3,200.00	-\$3,200.00	\$19,406.46
10/12/2020	Bank of America-Deposit	anne patrick reimbursement		\$1,500.00	-\$1,500.00	\$17,906.46
10/20/2020	Action Figure	Todd Jara	\$129.80		\$129.80	\$18,036.26
10/22/2020	Trademark Registration	Brad Small		\$10,000.00	-\$10,000.00	\$8,036.26
10/23/2020	Paypal	BBVA	\$113.98		\$113.98	\$8,150.24
10/23/2020	Venmo	Dillon Passage		\$1,000.00	-\$1,000.00	\$7,150.24

Date	Description	Memo	Deposit	Withdrawl	Change	Balance
10/27/2020	Dillon Tags	Tarrant County		\$2,379.00	-\$2,379.00	\$4,771.24
10/28/2020	Venmo	Dillon Passage		\$500.00	-\$500.00	\$4,271.24
10/30/2020	Odaina Clothing	Wells fargo to BBVA	\$741.90		\$741.90	\$5,013.14
11/3/2020	venmo	Dillon Passage		\$1,000.00	-\$1,000.00	\$4,013.14
11/9/2020	venmo	Dillon Passage		\$2,000.00	-\$2,000.00	\$2,013.14
11/9/2020	Dillon House	Nathaniel Mayfield		\$9,030.00	-\$9,030.00	-\$7,016.86
11/10/2020	William Taylor Fees	prison issues research		\$2,000.00	-\$2,000.00	-\$9,016.86
11/11/2020	Press Release	Tina Ayres		\$389.00	-\$389.00	-\$9,405.86
11/13/2020	Goode Productions	Wells fargo to BBVA	\$5,000.00		\$5,000.00	-\$4,405.86
11/13/2020	Venmo	Dillon Passage		\$1,200.00	-\$1,200.00	-\$5,605.86
11/18/2020	Paypal	BBVA	\$115.32		\$115.32	-\$5,490.54
11/19/2020	venmo	Dillon Passage		\$500.00	-\$500.00	-\$5,990.54
11/20/2020	Action Figure	Todd Jara	\$43.22		\$43.22	-\$5,947.32
11/24/2020	venmo	Dillon Passage		\$200.00	-\$200.00	-\$6,147.32
11/30/2020	venmo	Dillon Passage		\$1,400.00	-\$1,400.00	-\$7,547.32
12/1/2020	Wire Transfer	Brad Small for costumes		\$1,615.00	-\$1,615.00	-\$9,162.32
12/1/2020	Paypal	BBVA	\$260.97		\$260.97	-\$8,901.35
12/3/2020	Action Figure	Todd Jara	\$72.15		\$72.15	-\$8,829.20
12/4/2020	Paypal	BBVA	\$198.38		\$198.38	-\$8,630.82
12/8/2020	Joe Exotic Gaming Advance	Wells fargo to BBVA	\$10,000.00		\$10,000.00	\$1,369.18
12/9/2020	Starline Costumes LLC	Wells fargo to BBVA	\$11,409.40		\$11,409.40	\$12,778.58
12/9/2020	For Chevy	Zelle		\$300.00	-\$300.00	\$12,478.58
12/9/2020	Anne Patrick Reimbursement	Patrick		\$3,500.00	-\$3,500.00	\$8,978.58
12/9/2020	Brad Commission Gaming	Brad Small		\$2,265.00	-\$2,265.00	\$6,713.58
12/10/2020	venmo	Dillon Passage		\$620.00	-\$620.00	\$6,093.58
12/11/2020	venmo	Dillon Passage		\$1,000.00	-\$1,000.00	\$5,093.58
12/14/2020	Joe Exotic Gaming Advance	Wells fargo to BBVA	\$5,000.00		\$5,000.00	\$10,093.58
12/16/2020	Paypal	Dillon Passage		\$100.00	-\$100.00	\$9,993.58
12/16/2020	Regina Long	joe's phone	\$307.00		\$307.00	\$10,300.58
12/17/2020	venmo	dillon DC airfare		\$800.00	-\$800.00	\$9,500.58
12/21/2020	DC expenses for anne and dillon	reimbursement to anne patrick		\$1,300.00	-\$1,300.00	\$8,200.58
12/22/2020	Action Figure	Todd Jara	\$57.74		\$57.74	\$8,258.32

Date	Description	Memo	Deposit	Withdrawal	Change	Balance
12/23/2020	venmo	Dillon Passage		\$1,000.00	-\$1,000.00	\$7,258.32
12/28/2020	DC air travel for anne and chevy	anne patrick reimbursement		\$800.00	-\$800.00	\$6,458.32
12/31/2020	Goode Productions	Wire Transfer- Wells Fargo	\$20,000.00		\$20,000.00	\$26,458.32
1/4/2021	VideoMetadata	337 Forensics		\$2,029.69	-\$2,029.69	\$24,428.63
1/4/2021	Transfer	Dillon Passage		\$500.00	-\$500.00	\$23,928.63
1/5/2021	Paypal	BBVA	\$517.90		\$517.90	\$24,446.53
1/6/2021	Jet Fuel	APP Jet Center		\$1,143.17	-\$1,143.17	\$23,303.36
1/7/2021	nathaniel mayfield	dillon rent		\$1,500.00	-\$1,500.00	\$21,803.36
1/7/2021	Starline Costumes LLC	Trust BBVA/ PNC 5881	\$5,000.00		\$5,000.00	\$26,803.36
1/7/2021	Paypal	Dillon Passage		\$500.00	-\$500.00	\$26,303.36
1/12/2021	Paypal	Patrick		\$700.00	-\$700.00	\$25,603.36
1/12/2021	Paypal	Dillon Passage		\$1,400.00	-\$1,400.00	\$24,203.36
1/12/2021	legal research and drafting william taylor on mandamus	mandamus		\$4,025.00	-\$4,025.00	\$20,178.36
1/13/2021	Venmo	brad small costumes		\$750.00	-\$750.00	\$19,428.36
1/14/2021	Dillion Phone Bill	Regina Long		\$143.00	-\$143.00	\$19,285.36
1/19/2021	simon and shuster payment	book	\$42,500.00		\$42,500.00	\$61,785.36
1/19/2021	Goode productions permission to video	DC Expenses	\$7,500.00		\$7,500.00	\$69,285.36
1/19/2021	Venmo	Reinke		\$500.00	-\$500.00	\$68,785.36
1/20/2021	T&R Aviation	Travis Martin		\$5,000.00	-\$5,000.00	\$63,785.36
1/20/2021	Book Fee	Thomas Flannery		\$20,000.00	-\$20,000.00	\$43,785.36
1/21/2021	Commission	Brad Small		\$7,500.00	-\$7,500.00	\$36,285.36
1/22/2021	Paypal	Dillon Passage		\$500.00	-\$500.00	\$35,785.36
1/25/2021	Paypal	Patrick		\$1,500.00	-\$1,500.00	\$34,285.36
1/27/2021	Venmo	Dillon Passage		\$1,500.00	-\$1,500.00	\$32,785.36
2/5/2021	Paypal	Dillon Passage		\$2,300.00	-\$2,300.00	\$30,485.36
2/9/2021	Paypal	Regina Long		\$270.00	-\$270.00	\$30,215.36
2/9/2021	Paypal	tammy springer store		\$1,500.00	-\$1,500.00	\$28,715.36
2/10/2021	paypal contribution	BBVA	\$105.91		\$105.91	\$28,821.27
2/11/2021	Paypal	Patrick		\$200.00	-\$200.00	\$28,621.27
2/11/2021	venmo	Brad Small trademark fee		\$500.00	-\$500.00	\$28,121.27

Date	Description	Memo	Deposit	Withdrawal	Change	Balance
2/11/2021	Paypal	dillon veterinary bills		\$400.00	-\$400.00	\$27,721.27
2/13/2021	Venmo	Dillon Passage		\$1,500.00	-\$1,500.00	\$26,221.27
2/16/2021	Paypal	Patrick		\$550.00	-\$550.00	\$25,671.27
2/16/2021	Venmo	Dillon Passage		\$1,500.00	-\$1,500.00	\$24,171.27
2/18/2021	Paypal	Patrick		\$500.00	-\$500.00	\$23,671.27
2/22/2021	Venmo	perla annabi property taxes		\$825.00	-\$825.00	\$22,846.27
2/24/2021	Paypal	Dillon Passage		\$1,000.00	-\$1,000.00	\$21,846.27
2/24/2021	Venmo	Thomas Flannery		\$425.00	-\$425.00	\$21,421.27
2/25/2021	Paypal	brian houghtaling life insurance reimbursement to anne patrick		\$385.00	-\$385.00	\$21,036.27
3/1/2021	Meat for Ligers	donna d hall western union		\$2,580.00	-\$2,580.00	\$18,456.27
3/1/2021	Venmo	elliot crawford expenses		\$500.00	-\$500.00	\$17,956.27
3/3/2021	paypal contribution	BBVA	\$190.65		\$190.65	\$18,146.92
3/3/2021	Meat for Ligers	Mary Stevens western union		\$2,516.00	-\$2,516.00	\$15,630.92
3/4/2021	Letter brief for filing on severance of counts issue	Leigh Davis		\$2,000.00	-\$2,000.00	\$13,630.92
3/5/2021	Paypal	anne patrick		\$400.00	-\$400.00	\$13,230.92
3/8/2021	Paypal	tammy springer store		\$3,000.00	-\$3,000.00	\$10,230.92
3/8/2021	Paypal	Dillon Passage		\$3,500.00	-\$3,500.00	\$6,730.92
3/11/2021	Venmo	eric love surveillance of dillon		\$1,000.00	-\$1,000.00	\$5,730.92
3/16/2021	Paypal	regina long for dillon's phone		\$170.00	-\$170.00	\$5,560.92
3/19/2021	Jason Beckett	Western union		\$88.95	-\$88.95	\$5,471.97
3/19/2021	Paypal	anne patrick		\$250.00	-\$250.00	\$5,221.97
3/19/2021	Paypal	Patrick		\$465.00	-\$465.00	\$4,756.97
3/22/2021	paypal contribution	BBVA	\$48.25		\$48.25	\$4,805.22
3/22/2021	Paypal	anne patrick reimbursement commissary		\$200.00	-\$200.00	\$4,605.22
3/29/2021	Paypal	anne patrick reimbursement		\$200.00	-\$200.00	\$4,405.22
3/30/2021	Paypal	Dillon Passage		\$3,500.00	-\$3,500.00	\$905.22

Date	Description	Memo	Deposit	Withdrawl	Change	Balance
3/30/2021	Friends and Family	tammy springer store		\$800.00	-\$800.00	\$105.22
3/31/2021	Nicholas Snowden	Western union		\$56.95	-\$56.95	\$48.27
4/1/2021	Magazine	Nicholas Snowden		\$43.95	-\$43.95	\$4.32
4/5/2021	Michael guy Brooks	Western union		\$133.95	-\$133.95	-\$129.63
4/5/2021	Paypal	anne patrick reimbursement commissary		\$180.00	-\$180.00	-\$309.63
4/9/2021	Store Profit	Springer	\$2,223.00		\$2,223.00	\$1,913.37
4/9/2021	Venmo	Bradley Small		\$345.00	-\$345.00	\$1,568.37
4/12/2021	Paypal	constant contact anne patrick		\$200.00	-\$200.00	\$1,368.37
4/12/2021	cash app	anne patrick		\$300.00	-\$300.00	\$1,068.37
4/12/2021	Venmo	isai joe's prison items		\$685.00	-\$685.00	\$383.37
4/13/2021	Commission	Brad small autograph check cash deposit to BOA		\$2,250.00	-\$2,250.00	-\$1,866.63
4/14/2021	cash app	Dillon Passage		\$2,000.00	-\$2,000.00	-\$3,866.63
4/15/2021	autographs fiterman sports	Wells fargo to BBVA	\$15,000.00		\$15,000.00	\$11,133.37
4/16/2021	Action Figure	Todd Jara	\$21.64		\$21.64	\$11,155.01
4/16/2021	Paypal	regina long for dillon's phone		\$142.50	-\$142.50	\$11,012.51
4/20/2021	Rent for Nathaniel Mayfield	Wire Transfer- Wells Fargo		\$4,500.00	-\$4,500.00	\$6,512.51
4/27/2021	cash app	john frazier stamps		\$200.00	-\$200.00	\$6,312.51
4/29/2021	Paypal	tammy springer store		\$1,800.00	-\$1,800.00	\$4,512.51
4/29/2021	Paypal	Dillon Passage		\$3,500.00	-\$3,500.00	\$1,012.51
5/11/2021	Paypal	tammy springer store		\$1,350.00	-\$1,350.00	-\$337.49
5/17/2021	Paypal	Regina Long		\$142.50	-\$142.50	-\$479.99
5/19/2021	Paypal	brian houghtaling life insurance reimbursement to anne patrick		\$685.00	-\$685.00	-\$1,164.99
5/21/2021	Paypal	Springer		\$1,400.00	-\$1,400.00	-\$2,564.99
5/27/2021	Loan To Joe	BBVA	\$10,000.00		\$10,000.00	\$7,435.01

Date	Description	Memo	Deposit	Withdrawl	Change	Balance
5/27/2021	cash app	springer to "handle things"		\$1,000.00	-\$1,000.00	\$6,435.01
5/27/2021	Paypal	springer to "handle things"		\$2,500.00	-\$2,500.00	\$3,935.01
5/28/2021	Paypal	Dillon Passage		\$3,500.00	-\$3,500.00	\$435.01
6/2/2021	Paypal	isai joe's prison items		\$750.00	-\$750.00	-\$314.99
6/2/2021	Joe's Prison Items	Isai		\$1.00	-\$1.00	-\$315.99
6/3/2021	Paypal	tammy springer store		\$2,500.00	-\$2,500.00	-\$2,815.99
6/17/2021	Paypal	anne patrick		\$875.00	-\$875.00	-\$3,690.99
6/17/2021	Paypal	tammy springer store		\$2,500.00	-\$2,500.00	-\$6,190.99
6/17/2021	Paypal	Regina Long		\$143.00	-\$143.00	-\$6,333.99
6/17/2021	Cash advance from FH to Joe	cash in	\$3,500.00		\$3,500.00	-\$2,833.99
6/23/2021	cash app	isai joe's prison items		\$250.00	-\$250.00	-\$3,083.99
6/23/2021	reginald devin	prison books		\$208.95	-\$208.95	-\$3,292.94
6/24/2021	Venmo	brad small cannibus commission		\$1,500.00	-\$1,500.00	-\$4,792.94
6/25/2021	CashApp	Passage		\$1,500.00	-\$1,500.00	-\$6,292.94
6/28/2021	Paypal	springer to "handle things"		\$3,000.00	-\$3,000.00	-\$9,292.94
6/28/2021	advance by fh	Wells fargo to BBVA	\$4,000.00		\$4,000.00	-\$5,292.94
6/29/2021	Tango Hotel Charlie Group	deposited to WF trust and transver to BBVA	\$10,000.00		\$10,000.00	\$4,707.06
6/29/2021	Paypal	springer to "handle things"		\$2,000.00	-\$2,000.00	\$2,707.06
6/29/2021	CashApp	Patrick		\$300.00	-\$300.00	\$2,407.06
7/7/2021	nathaniel mayfield	Dillon Passage		\$1,500.00	-\$1,500.00	\$907.06
7/13/2021	Branch Deposit	BBVA	\$1,065.55		\$1,065.55	\$1,972.61
7/20/2021	Venmo	Lee whitfield forensics		\$2,030.00	-\$2,030.00	-\$57.39
7/28/2021	Paypal	springer to "handle things"		\$800.00	-\$800.00	-\$857.39
7/30/2021	So South Music royalty	Trust BBVA/ PNC 5881	\$1,013.61		\$1,013.61	\$156.22
8/12/2021	Venmo	Brad Small		\$150.00	-\$150.00	\$6.22
8/13/2021	Check- Action figure	Todd Jara	\$55.38		\$55.38	\$61.60
8/14/2021	Paypal	springer to "handle things"		\$3,300.00	-\$3,300.00	-\$3,238.40

Date	Description	Memo	Deposit	Withdrawl	Change	Balance
8/17/2021	brad small check 21,064	Wells fargo to BBVA	\$15,000.00		\$15,000.00	\$11,761.60
8/17/2021	Transfer	BBVA	\$55.38		\$55.38	\$11,816.98
8/17/2021	brad small check 21,064	Trust BBVA/ PNC 5881	\$6,064.00		\$6,064.00	\$17,880.98
8/17/2021	Transfer	loan repayment from Joe to FH		\$16,300.00	-\$16,300.00	\$1,580.98
8/18/2021	Paypal	Patrick		\$2,100.00	-\$2,100.00	-\$519.02
8/19/2021	Venmo	Dillon Passage		\$500.00	-\$500.00	-\$1,019.02
8/20/2021	Check-Law office of James D. Sullivan	Trust BBVA/ PNC 5881	\$5,700.00		\$5,700.00	\$4,680.98
8/20/2021	Seth Posey	western union by fh		\$4,205.99	-\$4,205.99	\$474.99
8/23/2021	Paypal	Springer		\$500.00	-\$500.00	-\$25.01
8/23/2021	Paypal	Patrick		\$500.00	-\$500.00	-\$525.01
8/25/2021	Paypal	Patrick		\$300.00	-\$300.00	-\$825.01
8/30/2021	So South Music royalty	Trust BBVA/ PNC 5881	\$852.35		\$852.35	\$27.34
8/31/2021	PayPal- \$22miguel22	Patrick		\$500.00	-\$500.00	-\$472.66
9/3/2021	Paypal	Patrick		\$400.00	-\$400.00	-\$872.66
9/3/2021	Paypal	Springer		\$500.00	-\$500.00	-\$1,372.66
9/3/2021	Paypal	Springer		\$3,000.00	-\$3,000.00	-\$4,372.66
9/3/2021	Check	Maximus Literary	\$42,500.00		\$42,500.00	\$38,127.34
9/6/2021	Wire Transfer	Brad Small book commission		\$7,500.00	-\$7,500.00	\$30,627.34
9/6/2021	Wire Transfer	Tom Flannery book		\$20,000.00	-\$20,000.00	\$10,627.34
9/7/2021	cash app	viridiana gomez		\$500.00	-\$500.00	\$10,127.34
9/7/2021	Paypal	shelley ipad reimbursement to anne patrick		\$1,700.00	-\$1,700.00	\$8,427.34
9/9/2021	Paypal	Patrick		\$100.00	-\$100.00	\$8,327.34
9/10/2021	Venmo	brad small		\$127.00	-\$127.00	\$8,200.34
9/11/2021	paypal contribution	BBVA	\$246.76		\$246.76	\$8,447.10
9/14/2021	John Graham son lawyer retainer			\$1,000.00	-\$1,000.00	\$7,447.10
9/14/2021	Paypal	Springer		\$2,000.00	-\$2,000.00	\$5,447.10
9/14/2021	Venmo	Brad Small		\$1,875.00	-\$1,875.00	\$3,572.10
9/14/2021	Paypal	Patrick		\$500.00	-\$500.00	\$3,072.10
9/16/2021	brad small- marihuana	advance cannabis	\$12,500.00			\$15,572.10

Date	Description	Memo	Deposit	Withdrawl	Change	Balance
9/27/2021	CashApp-Baby	Patrick		\$250.00	-\$250.00	\$15,322.10
9/28/2021	Paypal-John Graham	Patrick		\$300.00	-\$300.00	\$15,022.10
10/7/2021	Paypal-Indy	Patrick		\$400.00	-\$400.00	\$14,622.10
10/12/2021	Paypal-Indy	Patrick		\$400.00	-\$400.00	\$14,222.10
10/13/2021	cash app	goff 1500		\$1,500.00	-\$1,500.00	\$12,722.10
10/13/2021	CashApp	Goff		\$1.00	-\$1.00	\$12,721.10
10/14/2021	Paypal-Indy	Patrick		\$750.00	-\$750.00	\$11,971.10
10/15/2021	to bbva FH advance	Wells Fargo		\$5,000.00	-\$5,000.00	\$6,971.10
10/23/2021	Paypal-Indy	Patrick		\$400.00	-\$400.00	\$6,571.10
11/1/2021	CashApp	Patrick		\$1,500.00	-\$1,500.00	\$5,071.10
11/1/2021	Paypal-Indy	Patrick		\$375.00	-\$375.00	\$4,696.10
11/4/2021	paypal contribution	Ryan Addis	\$10.00		\$10.00	\$4,706.10
11/4/2021	paypay contribution	Tim Markus	\$20.00		\$20.00	\$4,726.10
11/4/2021	Paypal	Springer		\$1,500.00	-\$1,500.00	\$3,226.10
11/5/2021	Paypal	Anne		\$220.00	-\$220.00	\$3,006.10
11/9/2021	Paypal	Anne		\$360.00	-\$360.00	\$2,646.10
11/10/2021	magazine subscriptions for and by Joe	goff 1500		\$1,888.00	-\$1,888.00	\$758.10
11/16/2021	So South Music royalty	Trust BBVA/ PNC 5881	\$853.27		\$853.27	\$1,611.37
11/16/2021	Venmo	brad small music and NDF commission		\$878.00	-\$878.00	\$733.37
11/17/2021	voided check 5K	Brad Small			\$0.00	\$733.37
11/18/2021	Paypal	JP		\$7,500.00	-\$7,500.00	-\$6,766.63
11/26/2021	Paypal	anne patrick rent October and November per Joe letter		\$3,200.00		-\$9,966.63
11/26/2021	Paypal	Springer		\$5,000.00	-\$5,000.00	-\$14,966.63
Total:			\$328,827.77	\$343,794.40	-	-\$14,966.63

Exhibit 39

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Thursday, January 7, 2021 2:21 PM

To: texasmexicolaw@icloud.com

Subject: Well

1.7.20 12noon

Well, they tested everyone yesterday for COVID on this floor and today they are moving us to the GYM which means we more then likely are all positive but they wont even tell you the truth about your own health so I am not sure what the deal is, so I will be in touch when I can and you know my rules about my health.

Fransico, you are to pay the owner of the house 10,500.00 so the rest of 12 months are done and YOU make sure it is paid.

Dillon is to always get 1500.00 on the 13th of each month, and 1000.00 around the 25th of each month, if I aint around to do this. he will have to learn to budget money, NO ONE has the right to change my wishes for this,

Thanks for all you all have done,

Hun I love you so very much,

Confirm you got this so there is a record of it please,

Exhibit 40

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Wednesday, January 6, 2021 3:36 PM
To: texasmexicolaw@icloud.com
Subject: Dillon

1.6.20 3.15pm

Fran/Dillon

Not sure with the way this place works you never know when they will move you because of covid, two people on my floor were positive today so its now on my floor for sure and if you get it they move you so if I loose email next from being moved, Fran on the 13th please get Dillon 900.00 for bills and 500.00 for food and such please, then around the 23rd another 500.00 for food and such, I hope I am home by then or get to meet Fran so I can leave you directions how to handle things.

Thank you fran

I love you hun

Confirm you both got this

Exhibit 41

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)
Sent Date: Wednesday, October 14, 2020 1:06 PM
To: texasmexicolaw@icloud.com
Subject: RE: RE: Dillon

10-4

-----Hernandez, Fransico on 10/14/2020 10:24 AM wrote:

>

I did not send him 2000. I sent to Anne. Because she also has some expenses on the website.

JOSEPH MALDONADO-PASSAGE on 10/14/2020 7:06:01 AM wrote

I have no clue how things can get so screwed up, why would anyone send dillon 2000.00???????

he was suppose to get 500 to get storage and gas money to go to texas and 700.00 for insurance and money to live on at his sisters until we figure out something on this house deal.

He is not paying rent right now and he is not paying a car payment, he goes and gets a 1000.00 tattoo and buys his female friend a 200.00 make up mirror and then goes to atlanta for his manager and I have to pay that bill too,

This is why I decide what money and when it gets sent to him and NO ONE ELSE. if he is broke and I am out of touch you send him no more then 200 or 300 at a time.

Fran, get his tags please what ever that cost and overnight them to him so he can get the hell out of Florida please,

Ann, if you send him 2000.00 I am going to bust a gut, it will be gone by the 20th,

Exhibit 42

From: [Roland Johnson](#)
To: [Tamara Springer](#)
Cc: jmp@floridajustice.com; [Caroline Cyrier](#)
Subject: RE: Joseph Maldonado
Date: Tuesday, February 8, 2022 2:06:47 PM

Tami:

I am not able to communicate with you because Mr. Maldonado is represented by an attorney. Please direct all of your communications to Mr. Phillips.

Roland



Roland K. Johnson

Attorney at Law
777 Main Street, Suite 1800
Fort Worth, Texas 76102
[817-870-8765 \(direct\)](tel:817-870-8765)
[817-333-1199 \(fax\)](tel:817-333-1199)
rolandjohnson@hfblaw.com

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From: Tamara Springer <tchapman@nd.edu>
Sent: Sunday, February 6, 2022 12:55 PM
To: Roland Johnson <Rolandjohnson@hfblaw.com>
Subject: Joseph Maldonado

Mr. Johnson,

I am writing to you on behalf of Joseph Maldonado, as his power-of-attorney. He wants to know the status of the \$9,000 in his trust fund that Fran has not yet turned over to me, and also the \$33,000 lien on his car. Fran would not allow me to

pick up the car, even though Joe signed a lien on it. Thank you for your attention to this matter.

Tami Springer

Executive Assistant and Power of Attorney to Joe Exotic

Exhibit 43

francisco hernandez

From: MALDONADO-PASSAGE JOSEPH (26154017)

Sent Date: Tuesday, December 29, 2020 3:35 PM

To: texasmexicolaw@icloud.com

Subject: jan 6

12.29.20 3.20pm

Fran is thinking about him and Eric flying to DC on the 6th when Trump is calling for that rally. You all need to get with him and if he is schedule an event for fans to go, but I am trying to get him to do a press confrence as well since the media will already be there, and if we have to have Ann get 200 cds and give away for people that have free joe exotic signs. this gives over a week to get going. Treasa/Jim what you think?

Exhibit 44

francisco hernandez

From: texasmexicolaw@icloud.com
Sent Date: Thursday, July 30, 2020 8:20 AM
To: JOSEPH MALDONADO-PASSAGE (26154017)
Subject: RE: emmies

your friendship is my fee.

JOSEPH MALDONADO-PASSAGE on 7/29/2020 9:07:04 PM wrote

I can not thank you enough and you really dont know me yet but you will see I am a guy that will never forget what you have done for me, you get me out of here and life will be great for all of you, I will make sure that happens, I pray for a miricle to be home for Dillons Birthday, I think Rink and Jackie finally coming forward will help also, we need this to be in the public before you send that to Trump. Know from the bottom of my heart I appreciate what your doing Fran, and we will make the world proud.

-----Hernandez, Fransico on 7/29/2020 5:05 PM wrote:

>

I am proud for you my friend. do not worry about the work we are doing. it gets me up at 6:00 am to the office. it is fun.

I will sit as Eric as soon as I finish this email on the Merch.

today I will mail you the final Motion and Petition in intervention. Elliot Crawford in Oklahoma, Jim Zadeh, Sophia Maas, all worked on it and did a great job. of course, Anne gave them all the correct facts and versions on and off all day Saturday and Sunday. William Taylor is the Federal Court super lawyer. he ONLY works for lawyers, he is a good friend and is absolutely brilliant. I'm just letting you know some of the names of the folks working for you. they do not want publicity or money. they just want to do the work. of course Isai Hernandez does all the mail, database, sorting etc. I hired him when he got out of Fed prison sentence 12.5 years. while in prison, he sued the government and got himself citizenship so he wouldn't get deported. Phillip Hall, my associate, working on the Pardon with Victoria at Brandon's office. Jeff Hoover, my best friend since 1984, co counsel and keeps track of your file. Jeff paid all the expenses for the Bus and Trump Hotel for the Washington DC trip.

JOSEPH MALDONADO-PASSAGE on 7/29/2020 6:19:22 AM wrote

Fran, well congrats your client will make world news again, 6 emmies, that is incredatable, I know you have so much going on and working on this pardon but we can NOT allow JT to drop this merch ball, please get talks back with bravodo and see what can happen, we cant waste another 5 months on waiting for his people to walk on egg shells with rebecca and her bluff, please make something happen.

and I hope Don Jr. sees this emmie thing how it could help his dad go into 2020 but I got to have time to get out and do talk shows to get people to see he likes true justice and has no problem with gays, he cant wait till the last min

-----Hernandez, Fransico on 7/28/2020 3:27 PM wrote:

>

I'll get them downloaded and see where we can use them. I'll send you copies also. we expanded the intervention lawsuit b/c my friend Elliot came up with some good ideas and we needed info from Anne. we had her up late last night working and we'll file it today.

JOSEPH MALDONADO-PASSAGE on 7/28/2020 10:20:27 AM wrote

I had some really good letters sent to the judge about 12 or so they should be on pacer, some of those people have since turned for money but we still have their letters they filed with the judge, can we use them? and I keep forgetting to ask you, do we need to suck Lauren in on that tax case or what ever because she as my employer wrote the judge telling him and the world i was HIV positive which was a lie but dont that violate hipa law

-----Hernandez, Fransico on 7/27/2020 4:12 PM wrote:

Exhibit 45

francisco hernandez

From: texasmexicolaw@icloud.com
Sent Date: Monday, July 27, 2020 11:33 AM
To: JOSEPH MALDONADO-PASSAGE (26154017)
Subject: RE: letters

I will ask Erick to call Ronnie. they have developed a good conversation. The Direct Appeal will be extremely slow. Brandon sent you a copy of the letter extending Briefing schedule. we are pursuing the Pardon at all deliberate intent and aggressiveness. I mention the "timing" before. the Direct Appeal is a required step to see what went on in the trial according to the Record. I will ask Brandon if the trial transcript has been sent to you in case the Prison is holding it up.

you are correct about Lowe not stepping into a court room. he missed one last week and claims he was sick.

JOSEPH MALDONADO-PASSAGE on 7/27/2020 10:06:35 AM wrote
there should be a screen shot, ronnie or chris may have it of jeff bragging on FB he downloaded my computer when I was not in the office, and I sent that paperwork back to you I think that your friend did, ann keeps talking about the direct appeal also, you all dont sound very confident in this pardon, He will not show up for any court or depo, he thinks bryant and amanda green are going to protect him for ever, his ego is to big not to think that, I had Ann call the EPA and DEQ to make him clean up the back pasture with all the dead animals,

—Hernandez, Fransico on 7/27/2020 9:43 AM wrote:

>

yes, Eric and I are talking this morning. I will send you an updated version of the Intervention. My friend in OK worked on it over the weekend to beef it up. he added fraud and civil claim against Jeff for Hacking/stealing your computer and information. you will like it. Of course, I am sure he will refuse to show up in court.

I went ahead and filed an appearance in your civil case just to be safe. no decisions yet but we may consider withdrawing, without prejudice, until the direct appeal is done. I'd like to conduct some discovery through it but we may get there easier in the state case because the state is not as strict on discovery as feds. feds require you to show the direct relevance of the discovery. but, we can talk about that on the phone, if you still have the research that my friend William Taylor did, take a look at it again and tell me what you think. he put a lot of work into that. if you no longer have it, I will send again.

JOSEPH MALDONADO-PASSAGE on 7/25/2020 3:20:54 PM wrote

I know I get a shit ton of those forms so if its rejected mail there is a bunch, I got two envelopes that should have hit you today or monday and another one going out monday morning, have you heard from Eric?

Exhibit 46



Fox Rothschild LLP
ATTORNEYS AT LAW

Brad Small, Esq.
Fox Rothschild LLP
10250 Constellation Blvd.
Suite 900
Los Angeles, CA 90067

BRADLEY S. SMALL
Direct Dial: (310) 871-0225
E-mail: bsmall@foxrothschild.com

May14, 2022

OFFICE OF THE CHIEF DISCIPLINARY COUNSEL
STATE BAR OF TEXAS
Attn: Brenda Lopez (Brenda.Lopez@Texasbar.com)

Re: Case No. 202202193 - Notice of Grievance by Joseph Allen Maldonado - Passage / Francisco Hernandez

To whom it may concern:

I'm a partner in the Los Angeles office of the national law firm Fox Rothschild LLP.

I was engaged by Joseph Maldonado-Passage ("Client") to work with Client as entertainment counsel, and and watch over, negotiate, and review intellectual property and entertainment property opportunities commencing early-September, 2020.

My law firm and me terminated our representation of Client by letter in early-February, 2022.

Initially, I was hired while at my prior law firm to handle all of the entertainment and licensing property transactions for Client. In my experience, we must have negotiated 20 or so contracts licensing his name and likeness in the costume, gaming, cannabis, book, and television spaces. Some produced income and some did not.

Mr. Francisco Hernandez predated my representation was local counsel in Texas and handled many matters for Client, primarily pardon related, but did not make any entertainment/licensing deals, nor did he take any monies from Client as payment.

In my experience, Client never looked inward, but always looked outward, and blamed others for all circumstances. The most salient unethical and wrongful act I saw Client do was in not paying the ghostwriter of his book when Client had the money to do so and simply wanted to keep the money for himself - the collaborator/ghostwriter Tom Flannery was and is owed \$20,000.

After I finished a cryptocurrency deal in which coin makers developed a Tiger King coin (TKING), Client used another attorney to force the coin developers, demand them, for \$250,000 with threats

of bad publicity and other threats, to pay that money in cash or in other consideration. Although our law firm is and was due 15% (\$37,500 in this deal) from deals we negotiated for Client, we were not paid or compensated our legal fee whatsoever in that transaction.

Over the course of several years, I found in working and then observing Mr. Hernandez that he was always professional, ethical, and I have nothing but positive things to say about him and his law firm.

My review of the grievance filed by Mr. Maldonado-Passage is that it is without merit.

Please feel free to contact me with any questions..

Very best,

Brad
BRADLEY SMALL ESQ.
FOX ROTHSCHILD LLP