

IN THE CIRCUIT COURT OF THE 18TH JUDICIAL CIRCUIT,
IN AND FOR SEMINOLE COUNTY, FLORIDA

IN RE: THE MARRIAGE OF

CASE NO.: 2020DR003331

DIVISION: Domestic

HOLLY DERENTHAL,
Petitioner/ Wife,
and
MICHAEL J DERENTHAL,
Respondent/ Husband.

**DONALD SEOANE'S EXPEDITED MOTION FOR PROTECTIVE ORDER AND
INJUNCTIVE RELIEF AND JUDICIAL NOTICE AND AFFIDIVITS**

COMES NOW, Non-Party, DONALD SEOANE, (Hereinafter referred to as "Donald") Pro Se,
and files this "DONALD SEOANE'S EXPEDITED MOTION FOR PROTECTIVE ORDER
AND INJUNCTIVE RELIEF" and states the following:

Dear honorable judge JESSICA J. RECKSIEDLER I am filing this begging you and pray for your help
to finally get my and the respondents children out of the abuse they are currently in.

1. I Donald Seoane am the father of two minor child A,L,S 4 years old and A,J,S 5 years
Old that are currently being physically and sexually abused by the mother and her
prostitution client Onlyfans fanboi federal agent for Customs and Border patrol NOEL
AARON MARQUIS.
2. Courrpt judge Holly Marie Newman Derenthal is a criminal and child abuser and belongs
in a prison cell for her crimes against me and my children and countless others. I have
sued her in Florida Federal court, filed 4 JQC complaints, open letters to the governor
and publicly calling for her arrest and disbarment for several months and much more.
3. My son a month ago had two large bruises on his lower back from Noel punching him
and I have videos and child consoler reports in Exhibit A proving noels abuse of my
children going back two years now that keeps getting covered up because he is a federal
agent. I have my son on video two months ago saying how Noel punches him in the back.
4. Noel Aaron Marquis is a very corrupt violent abusive federal agent employed by
Customs and Border patrol and has mental issues as well from being a wounded war
veteran and he has his wife GRECITA GAYLON MARQUIS terrified of him and he has

brainwashed her children scaring the mother to come forward with me against him and get herself, her children and my children help, away from him into safety.

5. My children's mother has been documented leaving them in crackhouses with crackheads smoking drugs around them in the same room for 2 years now as well as filming porn in front of my children and showing them porn on her phones and it has all been covered up by the corrupt tax payer check collecting corrupt females that work in government connected to countless corrupt individuals including the petitioner in this case that is now a corrupt judge named Holly N Derenthal. Holly Newman Marie Derenthal is a dangerous criminal connected with the Osceola county Sheriff's office and corrupt sheriff Marcos Lopez and countless other corrupt individuals including but not limited to DCF Kissimmee, CPT Kissimmee, Help Now Shelter, Corrupt tax payer funded compulsive lying female man hating help now shelter injunction for protection lawyers Jennifer Jane Watson and Sara Vance and many more involved in countless felonies Holly Derenthal is adding and abetting in as well as countless felonies she is committing herself. Felony Conspiracy, Felony official misconduct, Assistist and covering up Felony Perjury and on and on and on. Most importantly she is a literally a child abuser that has covered child abuse and placed and kept my 4 and 6 year old in an abusive situation where they are currently being physically, mentally and sexually abused and that's why I feel it necessary to file this into her divorce and custody case to let you your honor and this court know what and who corrupt judge Holly Marie Newman Derenthal really is.
6. Florida Statute **§61.13** indicates that it is the state's policy that child custody decisions are made in accordance with the best interests of the child.
7. This Court entered an order on 12/07/2020 "FINAL JUDGMENT / JUDGE RECKSIEDLER 12/4/2020 Instrument: 2020141311" which has to do with custody time sharing and money and I fell that judge Derenthal has used her corrupt power and connections as a judge in this case like she has in my case to gains a unfair advantage and this court should relook at what her husband Michael Joseph Derenthal wanted and whats in the best interested of the children.
8. Furthermore because Holly N Derenthal has violated countless laws, Florida Cannons, and constitutional rights while refusing to recuse herself in over 13 motions to recuse, 4 Motions to disqualify and more she has caused the public which is disgusted by her actions to put her entire families reputations under attack online including her 20 year old daughter Anna Lane Derenthal that is about to be expelled from Florida State University as well as her husband's reality company a nd his job Michael Joseph Derenthal of FloridaLakeFront.com Keller Williams.

9. Holly N Derenthal's lack of respect and care for the law and her families wellbeing this court should take into serious reconsideration as she is STILL railroading me illegally with bias refusing to recuse herself and follow the law and in turn causing a public PR disaster for her entire family.

Some more background from a motion I filed in Noel's divorce case all relevant here:

10. *[[my wife a Thai drug addicted adult movie star prostitute which Noel was paying for her prostitution services and cheating on his wife with through payments shown in their bank statements to Onlyfans]]* violently threw his wife from her own home while my two children hide upstairs under the bed with their 3 children. Then Noel alienated her from her own 3 children and wouldn't let her into her own house or to see her children while he was sleeping with my wife and kids in her home and mine which forced her to file for divorce in December of 2022. How do I know about the incident hiding under the bed you ask well because my children at the time told me about it and I believe I possibly even have the children talking about it on video somewhere.
11. My story and the pain and suffering me, my family and children have endured for 2 years now while Noel was cheating with my wife and GRECITA didn't even know it is sad and shocking all because of this corrupt perverted child and women abusing federal agent Noel Aaron Marquis and it's all a very long story and heart breaking and I am filing this motion hoping for finally some justice for all the children not only mine but GRECITA GAYLON MARQUIS and Holly N Derenthal's kids as well as so far I been met for two years with countless corrupt state employed officials that have done nothing but lie lie lie lie lie to cover Noel and my wife's dirty tracks and in return accuse me of making things up to remove my custody and alienate me from my children while Noel and my wife are abusing them you will see evidence of below. All while corrupt judge Holly N Derenthal is covering this all up and keeping my children in the abuse!
12. I am going to shock this court with much evidence, witnesses and sworn statements from Neighbors, child consoler and more so please pay close attention and see all of this even though it's a lot and sounds way crazy! The craziness of this whole situation has been caused by noel and his corruption throwing his weight around with his little federal agent badge scaring countless state employees from DCF, to CPT, to Sheriff's to judges to countless more.
13. I have had to file a federal lawsuit against 3 state court corrupt female judges in Osceola county, The Sherriff Marcos Lopez, JQC director Blan Teagle, and about 25 corrupt FEMALES around DCF, Child protection team and many more and it's all been because of Noel I have now learned. Florida federal court Case number 6:2023cv01906 Full text

here <https://www.docdroid.net/aJNVhVs/seoane-vs-derenthal-federal-lawsuit-full-text-pdf>

14. I have filed a separate federal lawsuit against Noel and im about to file several more against others like Customs and Border patrol and more. Florida federal court Case number 6:23-cv-02065 Full text here <https://www.docdroid.net/Y2rqGUv/noel-a-marquis-lawsuit-pdf>
15. I have filed several criminal complaints with the Osceola county sheriff's office that have all been covered up for federal agent Noel and corrupt judge Holly N Derenthal.
16. I know the court normally won't follow internet links or see video links but if you not only read those two federal lawsuits and see all the evidence you will see everything I am saying now and have ever said is fact and truthful. You can also go down a rabbit hole of evidence at <http://www.Donaldseoane.com> and <https://www.noelleaks.com> that's getting bigger by the day and this motion will be made very public also.
17. Noel has become good friends with my wifes best friend she calls mom across the street named Michelle Gilliam and well know drug addict drug trafficker that has a long criminal record not only for drugs but for child neglect and has had her own children taken away by DCF. Noel and my wife leave all 5 children at Michelle house while they are smoking drugs in the same room with the children that's been well documented for 2 years now. See police report and criminal charges in Exhibit B
18. In exhibits are just a few pieces of evidence to Noel Aaron Marquis countless crimes and please also take note that now Noel is showing his 3 children and my two children 4 and 5 years old all my adult videos online and having them call GRECITA GAYLON MARQUIS and threaten her that she better not side with me against their dad. Noel and judge Holly N Derenthal need to be put in a prison cell for the rest of his sorry life for his crimes and never be allowed around any children ever again.
19. There is a ton more to tell including how Noel assisted to have me falsely arrested for 3 counts of domestic violence which a jury impeached my wife at the criminal trial in front of the jury for all her perjury and her admitting to perjury and the jury deliberated a not guilty within ten minutes and on and on and on but I am going to cut this short here and ask for relief now and then show you exhibits.
20. I have now hired GRECITA GAYLON MARQUIS lawyer in my divorce case as well and they are also trying to get her to come forward about all of Noel's abuse and stand up against him for her children and mine but she is terrified of Noel and fears for her life and

her children's life as he is a violent mentally deranged man with a gun. Since then they have forced him off my case.

21. Exhibit C contains two affidavits, one from the children's consoler and a second from a neighbor that both affidavits detail abuse.

WHEREFORE, Non-Party, Donald Seoane, respectfully requests the Court enter an

Order:

Request for relief:

1. Set an expedited order setting an expedited hearing for me and others to come testify about the facts surrounding this mess and the corrupt criminal abuser that Noel Aaron Marquis really is and corrupt judge Holly N Derenthal.
2. Grant any and all injunctive relief legally possible and or an injunction order as I have filed countless in Osceola county on behalf of my children and while a male judge granted the last one temporary the corrupt actors in our government made him recuse himself and then put corrupt FEMALE man hating judge Holly N Derenthal on my case and she dismissed and covered it up including hiding the CPT forensic interview video tapes she had ordered twice and assisted in the forensic interviewer to commit perjury and the Osceola county sheriff's office keeps covering it up also.
3. Take into account I am Pro Se filing this with nobody's assistance and PLEASE take this into consideration when making your order and if legally possible and going to deny my motion please only deny it in part and grant whatever else is legally allowed to help all the children.
4. Order Child Protection Team Kissimmee Florida to turn over all THREE child forensic interview video tapes of 3 of my 4 children they lied and committed perjury about and corrupt judge Holly N Derenthal has covered up in countless hearings and cases.
5. See exhibits below and take them and all the text and exhibits in my federal lawsuits as judicial notice for this case. Allow this court to take judicial notice of everything here as well as the sworn affidavits
6. Grant any and all other relief deemed necessary and apococate.

VERIFICATION

Under penalty of perjury, I declare that I have read the following documents and that the facts stated in it are true and correct to the best of my knowledge.

Signature Donald Seoane

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing will be furnished via Florida Courts E-filing Portal and US mail to: Holly Marine Newman Derenthal on this 27th day of November, 2023.

Donald Seoane

I certify that a copy of this document was () mailed () faxed and mailed (*) e-mailed () hand-

delivered to the person(s) listed below on {date} _____.

Other party or his/her attorney:

Printed Name: Holly Marine Newman Derenthal _____

Address: 953 Leigh Ave, _____

City, State, Zip: Orlando, FL 32804-2214 _____

Telephone Number: 407-742-3500 _____

Fax Number: _____

Designated E-mail Address(es): Noel Aaron Marquis

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this motion and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated: 11-27-23

1. Donald Seoane

Signature of Party or his/her attorney

Printed Name: Donald Seoane _____

Address: Please use email for service Travelingrvstyle@gmail.com

City, State, Zip: _____

Telephone Number: _____

Fax Number: _____

Designated E-mail Address(es): Travelingrvstyle@gmail.com

EXHIBIT A



New Way Counseling Services, Inc. 4670 Lipscomb St. Suite 2, Palm Bay, FL 32905

Phone: 321-312-1666

Fax: 321-733-1860

Counselor.nwcs@protonmail.com

Re: Andrew Seoane

Date of Birth: 11/08/2017

Date: 7/4/2023

Andrew was seen in my office on June 23rd. His father brought the kids to my office so I can talk to them and ask few questions. His father was told by the mother and her attorney that the Andrew was acting inappropriately. Andrew was asked if he was behaving inappropriately and exposing his private parts. He immediately became very angry and embarrassed and said he was doing that, and it was his mom who was making naked videos for Tik Tok. Client did not want to talk about this anymore and he was left alone

Later on father called the authorities and reported all that to the police and DCF.

Andrew was very traumatized and hid under the couch when the police arrived, and they could not find him for a long time.

He was reported missing and the helicopter were sent to look for him but he turned up from under the couch later on.

Andrew also threatened his two sisters, that he was going to kill everyone and will make the house his own. Since then client has not exhibited any inappropriate or abnormal behavior.

Andrew was seen again today via video and appeared very happy and was smiling. He seemed to have lost two teeth due to an accident where he and his sister ran into each other and he lost two teeth and the sister had a bruise on her forehead. The father took them to ER and they were fine.

Andrew is looking happy now and is staying with the father after he was granted temporary custody of the two children.

Rahila Bashir, LMHC



Rahila Bashir, LMHC

A handwritten signature in blue ink, appearing to read 'Rahila Bashir', is written over the printed name.

New Way Counseling Services Inc.
4670 Lipscomb St. Suite 2
Palm Bay, FL 32905
321-312-1666
rbashir.nwcs@protonmail.com



NWCS

New Way Counseling Services, Inc. 4670 Lipscomb St. Suite 2, Palm Bay, FL 32905

Phone: 321-312-1666

Fax: 321-733-1860

Counselor.nwcs@protonmail.com

To whom it may Concern

Re: Andrew Seoane
Date of Birth: 11-08-2017
Anna Seoane
Date of Birth: 05/30/2019

I am writing this on behalf of minor children: Andrew, and Anna Seoane. Their father has been very concerned about a few things that Andrew shared with me about what goes on while he is at his mother's house. Last week Andrew was playing at the neighbor's house in the screened porch while mother was out in the back with the lady Michelle doing Bar BQ. Andrew fell and two of his front teeth became loose.

His mother did not do anything and did not take him to the dentist the whole week. Andrew had a bruise on his lip and was in pain and could not eat. When he came to his father's house a week later, he was unable to chew his food and complain of it hurting when he tried to eat. His step mother had to cut the food in small pieces and put it in the back of his mouth to help him eat. Mr. Seoane took him to the dentist the next day and he has to go back to get those teeth pulled.

Andrew also shared that he is often left with the neighbor Michelle for babysitting while the court order clearly states that the kids are not to be left alone with that lady.

Andrew also shared that at times he is left with Michelle and mom's boyfriend Neal.

Andrew also stated that he and his sister Anna have gone grocery shopping with Michelle in her car with no car seats. And that his mother would drive the golf



card to take both of them shopping with ne safety features like seat belts or closed in sides.

Andrew also shared that mom often wears her underwear and makes videos for her TIK TOK page and she is dancing in front of the camera and the kids.

Andrew also shared that Mom and Neal often continue to talk bad about daddy that Daddy is bad because he hit Mommy.

Andrew also shared that his mom sleeps in her underwear with Neal hugging and kissing while Anna is in the same bed with them.

Andrew shared that the little Anna has been saying bad words like "shake that Booty" and the two kids rub their bottoms together as if they are copying Mom and mom gets upset and hits them.

Anna has also agreed that she often sleep in bed with mommy and Neal.

These things that Andrews shared are very upsetting to their father. And the fact that he cannot eat is also upsetting for his older sister Stacy.

I am hoping that court will take these facts into consideration to help these two young children and may be put more restrictions on the mother such as supervised visits or less time with her until she learns to follow the court order.

Rahila Bashir, Licensed Mental Health Counselor
License # MH7753

New Way counseling Services Inc.
Note Completed By: Rahila Bashir
Patient: Andrew Seoane, DOB 11/8/2017

Date and Time: July 25, 2022 7:42PM

Contacted Party

Name: Andrew Seoane
Relationship to Patient: Self

Method of Communication

In Person

Reason for Communication

Counseling

Billing Information

Time spent: 60 minutes
The patient will not be billed for this communication.

Communication Details

On July 22nd, 2022 I drove with Donald Seoane and his daughter Stacy Seoane to Kissimmee Police station to pick up the two younger children, Anna and Andrew for weekend visitation with their father. As he has not had contact with them in about a month and he did not want to be accused of coaching the children or having them lied. I was with them from the time we picked up the children, till we got to my office and made the call to the abuse hot line.

A visual inspection of any marks on the body was conducted. Andrew had multiple scratches on his arms and Anna had scratches on her leg.

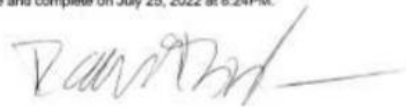
Children were transported to Palm Bay to my office and I spoke to the children during our ride. This is what was uncovered, Andrew reported that his mother engages in using marijuana and drinking beer with the neighbor lady and has left him alone at home at least on one occasion.

According to Andrew, this activity goes on on daily bases during the day and at night. Andrew also disclosed that he has not been in a car seat since he has been with his father, and the mother has been transporting the children in ubers without car seats. Andrew also reported that mother's boyfriend Neil only has one car seat for Anna and not one for Andrew. He also disclosed that they were brought to the police station, and to the court house the day before, in ubers without car seats. According to Andrew multiple men are coming to the house, smoking marijuana with mom and laying in daddy's bed and hugging and kissing mom. Andrew also reported that men have been giving her money.

Andrew has reported that Neil (a man she met on tik tok) has been telling him that Daddy does bad things and hits mommy. When asked if he has ever seen daddy hit mommy, he said no. When asked if he has ever seen Mom hit Stacy, he said yes. He said he has seen mommy hit Stacy a lot, with her hands. When asked if mom leaves the two kids alone with her boyfriend, he said yes. He also said that mom shakes her butt in her underwear in front of the camera for her tik toks.

In my 20 plus experience of working with children, I feel that the child appears to be telling the truth.

Rahila Bashir, Licensed Mental Health Counselor, License #MH7753 signed this note and declared this information to be accurate and complete on July 25, 2022 at 8:24PM.



Contact Note

New Way counseling Services Inc.

Date and Time: July 8, 2022 11:43PM

Note Completed By: **Rahila Bashir**

Patient: **Stacy Seoane, DOB 5/20/2011**

Contacted Party

Name: **Stacy Seoane**

Relationship to Patient: **Self**

Method of Communication

In Person

Reason for Communication

Counseling to help with trauma and abuse issues.

Billing Information

The patient will not be billed for this communication.

Communication Details

Stacy started her treatment on 23rd of June of this year. She has been seen twice a week since the last two weeks.

Stacy has been talking about her life since the family lived in Thailand and then they moved to different countries and finally arrived in United States. Stacy shared with this counselor things about her step mother and the abuse she was subjected to. Stacy reported that before she found out that the step mother was not her real mother; her step mother was very abusive to her. Stacy reported that her step mother used to punch her and slap her in the face, arms and legs, and sometimes smack her in the face, and would say she was not her daughter. She reports that the step mom would treat her two children differently and let them have Popsicles before dinner and not give her one. She said the other two kids blamed everything on her and the step mom would punish her. Stacy stated that the step mom would often go to the neighbor's house and smoke with her and would leave her to baby sit the younger siblings.

Stacy talked about the time when her step mother would have a fit and will beat herself on the face and once she had a black eye and blamed it on the husband. Stacy also talked about this DCF investigator name Jazelle who asked Stacy a few questions and when Stacy told her the truth, the case worker stated "your Dad is training you well."

Stacy also talked about some of the times when her stepmother would feed the two younger kids very late and they would be waiting to be fed breakfast. Stacy also remember that her step mom would go outside and smoke cigarettes and marijuana with the neighbor lady and would tell dad that she was inside with the kids but Stacy says that the three of them were alone in the house when Mom was outside. This was during the time her Dad was in Miami taking care of his Dad. Stacy also reported that at times her step mother will go shopping and will leave the kids alone and tell the Dad that she was home all the time.

Stacy talked about how her step mother was texting several guys in Thailand and one in Illinois and she was sending money to all of the guys in Thailand. Stacy also talked about the time when Stacy went to the neighbor's house to tell them to call 911 because the step mom was arguing with Dad and the neighbor lied and told the 911 operator that Dad was hitting step mom and had threatened to kill step mom.

Stacy Reports that on one occasion, they were riding the golf cart with Mom and Michelle, the neighbor lady in the front seat and the three children in the back, and Stacy could smell the smell of marijuana, she saw them passing it back and forth. The three of the kids were watching them smoke.


In my professional opinion of practicing 20 plus years, as I have tried to determine if Stacy is being coached or is she telling the truth. I feel that she appears to be telling the truth.

Rahila Bashir, Licensed Mental Health Counselor, License #MH7753 signed this note and declared this information to be accurate and complete on July 11, 2022 at 4:45PM.



EXHIBIT B

Browser address bar: <https://courts.osceolaclerk.com/BenchmarkWeb/CourtCase.aspx/Details/1181255?digest=1RVF5pVost>



Username:

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2008 CF 000429 CR - STATE OF FLORIDA vs. GILLIAM, MICHELLE

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SUMMARY

Judge:	MORGAN, JON B	Court Type:	FELONY	Case Type:	
Case Number:	2008 CF 000429 CR	Uniform Case Number:	492008CF000429XXCRXX	Status:	CLOSED
Clerk File Date:	1/22/2008	Status Date:	5/27/2008	Waive Speedy Trial:	<input type="checkbox"/>
Total Fees Due:	0.00	Custody Location:		Agency:	OSCEOLA COUNTY SHERIFFS OFFICE
Agency Report Number:	081006503				

PARTIES

TYPE	PARTY NAME	ATTORNEY
DEFENDANT	GILLIAM, MICHELLE	WESTERVELT, JAMES (Main Attorney)
PLAINTIFF	STATE OF FLORIDA	

CHARGES

COUNT	DESCRIPTION	LEVEL	DEGREE	PLEA	DISPOSITION	DISPOSITION DATE
1	CHILD NEGLECT (827.03 3b)	F	S		NO INFORMATION	05/27/2008
2	POSSESSION OF COCAINE (893.13 6a)	F	T		NO INFORMATION	05/27/2008
3	POSSESSION OF 20 GRAMS OR LESS OF CANNABIS (893.13 6b)	M	F		NO INFORMATION	05/27/2008
4	POSSESSION OF DRUG PARAPHERNALIA (893.147 1)	M	F		NO INFORMATION	05/27/2008

EVENTS



OSCEOLA COUNTY
SHERIFF'S OFFICE

Continuation of: Charging Affidavit
 FSAO

Defendant Name	SEE PAGE 1	Case Number	081006503	Page	2	of	2
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ON 01-18-08, I RESPONDED 5565 WEST IRLLO BRONSON HIGHWAY #508, IN REFERENCE TO A COMPLAINT OF ON GOING DRUG SALES FROM THE ROOM. UPON ARRIVAL, I ALONG WITH D/S BARDIS, MADE CONTACT WITH A BLACK FEMALE, MICHELLE GILLIAM. MICHELLE WAS INFORMED FOR THE REASON OF OUR PRESENCE AND EXPLAINED ON LY HER AND HER DAUGHTER WERE PRESENT. SHE THEN AGREED VERBALLY TO ALLOW US TO SEARCH. WHILE CONDUCTING THE SEARCH, I HEARD NUMEROUS NOISES FROM THE BATHROOM. UPON MAKING CONTACT AT THE BATHROOM WITH A BLACK MALE, PIERRE EVANS, I HEARD THE SOUND OF THE TOILET FLUSHING.

AFTER HE EXITED THE BATHROOM, I EXPLAINED TO HIM ASWELL THE REASON FOR US BEING PRESENT. PIERRE STATED HE HAD NOTHING ILLEGAL ON HIM AND CONSENTED TO A SEARCH OF HIS PERSON. UPON SEARCHING PIERRE, A CUT DOWN CIGAR TUBE WAS LOCATED ON HIM. INSIDE OF THE CIGAR TUBE WERE SEVERAL SMALL TRACE AMOUNTS OF SUSPECTED COCAINE. A PRESUMPTIVE FIELD TEST VERIFIED THE ITEMS TO BE COCAINE. PIERRE WAS PLACED UNDER ARREST FOR POSSESSION OF COCAINE AND POSSESSION OF DRUG PARAPHERNIA, PURSUANT TO F.S.S 893.13(6)A AND F.S.S893.147(1).

D/S BARDIS CONDUCTED A SUBSEQUENT SEARCH OF THE ROOM, VIA THE VERBAL CONSENT GIVEN EARLIER FROM MICHELLE. IN THE NIGHTSTAND DRAWER HE LOCATED A SINGLE PIECE OF SUSPECTED CRACK COCAINE, ALONG WITH SEVERAL PIPES, COMMONLY USED FOR THE INTRODUCTION OF COCAINE INTO THE BODY VIA INHALATION AND SEVERAL HAND ROLLED CIGARETTES WHICH CONTAINED CANNABIS. THE SUSPECTED CRACK COCAINE WAS TESTED USING A REAGENT TEST, WHICH VERIFIED THE PRESENCE OF COCAINE. A REAGENT TEST ALSO VERIFIED CANNABIS WAS CONTAINED WITHIN THE HAND ROLLED CIGARETTES.

ALL ITEMS WERE ENTERED INTO EVIDENCE AT THE OSCEOLA COUNTY SHERIFFS OFFICE.

ALSO NOTED WERE THE CONDITIONS IN WHICH MICHELLE AND HER 11 YEAR OLD CHILD WERE LIVING IN. AT BEST COULD BE CONSIDERED DEPLORABLE. THERE WAS OLD FOOD LEFT ON THE SINK, WHICH APPEARED TO HAVE BEEN THERE FOR SEVERAL DAYS. THE ROOM HAD A FOUL STENCH, FROM OVERFLOWING GARBAGE AND ROTTEN FOOD. THERE WERE SEVERAL COCKROACHES AND OTHER INSECTS OBSERVED WHILE IN THE ROOM. AN OVER FLOWING PILE OF DIRTY CLOTHESMIXED IN WITH SOMEWHAT CLEAN CLOTHES, ALL WERE STACKED ON THE FLOOR. INSIDE OF THE REFRIDGERATOR WERE NO OBSERVED DRINKS, ONLY MOLDED OVER SPOILED FOOD. THE ONLY FOOD VISIBLE WHICH WAS POSSIBLY OK TO CONSUME WAS A FEW CANS OF SOUP AND ONE CAN OF OATMEAL.

THE JUVENILE WAS RELEASED TO HER FATHER, TONY MCNAMEE, WHO WAS NOT PRESENT AT THE TIME OF THE CONTACT. DCF WAS NOTIFIED VIA FAX.

BASED ON THE ABOVE, MICHELLE WAS ALSO CHARGED WITH CHILD NEGLECT, PURSUANT TO F.S.S 827.03, FOR FAILING TO PROVIDE A RESIDENCE WITH NORMAL LIVING CONDITIONS FOR HER CHILD, WHICH WOULD INCLUDE FOOD, WATER, AND NO SAFETY HAZARDS WHICH WERE CLEARLY PRESENT IE: CRACK COCAINE AND SEVERAL PIECES OF PARAPHERNALIA.

NOTE PIERRE IS CURRENTLY OUT ON BOND, FOR VIOLATION OF PROBATION, RELEASED 01-18-08. HE WAS HELD WITH A NO BOND STATUS*

BOTH WERE TRANSPORTED TO OSCEOLA COUNTY CORRECTIONS.

EXHIBITS C

To whom I may concern,

I am writing this letter on behalf of my good friend and neighbor that I have known for over a year. Since we have spent family time with each other families and my daughter and my son would go over to play with Donald kids, my husband and I would even let my daughter and his daughter have sleep over and they are very good friends.

Donald and his Fiancé are always very involved and make sure his 4 kids have what they need in the house and we have always seen Donald very involve and protective towards his children and make sure their wellbeing and safety was always first. Has our family relationship developed Donald kids got really close to ours so we spend more times at least either eating dinner together or Donald always inviting us over for a cook out?

I am also very close to his Fiancé and Donald youngest Son so both myself and Donald fiancé spend quality time with the children and even Donald played with the kids so my family always enjoyed our time there, But or a more serious time there was one morning that his son was missing and Donald could not find him so he called 911 worried that he ran away because prior to his disappearance he was acting out towards the family and saying he wanted to leave and just being mean to his sisters and to his Step Mother, so Donald tried to ask his son what wrong buddy? He kept on saying nothing (I can't tell you) Donald kept asking him "what can't you tell me"? But his son just didn't say anything and that's when Donald came to my house and asked if we could help him eventually we found him and 911 arrived so myself, and the kids and the Step Mother where in the house while Donald spoke the officer that arrived at that point I was asking Dons son what was wrong and he ran to his room. Donald finish talking to the officers and so Donald and I went to his son room to see if he was ok and told him that he wasn't in trouble but we just needed to know what caused him to be so upset that morning but he refused to talk to us so Donald ask me if I wanted to try and ask him so I went to give his son a hug and told him he be ok and asked him what was wrong? He started by telling me he scared so I ask him do you like Daddy and he said yes, Do you like it here living with Daddy he said yes, and I asked him if he like at mommy house and he said yes also but he said mommy will be mad at me, So I asked him why would mom be mad at you? Did you do something? He said no mommy said not to say anything, I asked him about what? He response about her doing tiktok so I told him why can't you tell Daddy about her tiktok he said mommy said I can't tell Daddy about her tiktok so I ask what was wrong with her doing tiktok, Andrew said that mommy does tiktok videos with no clothes on and shake her butt, mommy said I can't tell Dad so I don't want to get in trouble, so at that point we came out at Andrews room and went to Don to share what Andrew told me. We told Andrew that he wouldn't be in trouble he also shared with me and Donald that mommies Boyfriend isn't nice to him and hit him we ask to show us where he hits you so he showed us and he pointed towards his mid back while mom saw the Boyfriend hit Andrew.

I believe that these children were taken from a safe and loving home where they all enrolled in school and Donald make sure all their needs where always meet and its breaks my heart to see that Donald got

his children taken from him when he was been there and nothing but a responsible father to his children, We the Brunelle Family care deeply for them and would love to see those babies be return to their father so please allow him to speak his truth.....

Sincerely,

Berkys Brunelle

AFFIDAVIT

(Sworn Statement)

I have known Mr. Seoane since June of 2022 when he came to my office with his oldest daughter Stacy for counseling. Mr. Seoane also asked me to see his younger two children Andrew and Anna at a later time. I have been working with his children and have known the whole family since then. He is currently living with his fiancé and a 4 month old son and his daughter Stacy. I have been seeing his children frequently and have come to know that whole family very closely.

Mr. Seoane is a very family oriented man and he loves all his children very well. Currently his two children have been returned to their mom and he will only be allowed to see them during a supervised visit starting at a later date.

Mr. Seoane is very distraught over the separation from his children and his fiancé and his older daughter are all very sad over this separation from the two younger children.

I have come to know this family and this man very well and I can say that he wants the best for his children and would never do anything to harm them.

Mr. Seoane is a very law abiding person and he works very hard to take care of his family.

I have seen that he and his fiancé worked very hard to enroll the two younger children in the same school that his daughter was going to, which is a very highly rated chartered school in the area.

I can see that the children were very happy there and the whole family was doing well and getting along well with each other.

I support Mr. Seoane and recommend that the children be returned to him because they need a stable family environment which their mother is unable to provide due to the following reasons:

Mother does not have means to provide for the children, nor is she employed. Mother does not have a car and has no family support system in this country since she is from Thailand. Mother is not trained to do anything since in her country she was in the prostitution industry, which is very common there.

Mother is irresponsible and often behaves inappropriately in front of the children while she is in the company of her male friends.

I am aware that Mr. Seoane has been accused of coaching his son but I know that is not true because he made a video of me questioning Andrew in my office about the inappropriate behavior.

As far as my qualifications and my experience, I am licensed by the state of Florida and have been working in this field for about 25 years. I have worked with all ages, children and adults.

Overall I feel that the mother is not in the best situation to provide a healthy and stable environment to the upbringing of the children. The children had gotten used to living with the

father full time and had already started school and were there two weeks already. In the end I repeat, I support Mr. Seoane completely and request that the children be returned to him full time, and be allowed supervised visits with the mother.

Rahila Bashir, LMHC

Florida License: MH7753

Affiant's Signature: [Signature]

Date 9-5-23

NOTARY ACKNOWLEDGEMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which the certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of Florida

On 9-5, 2023, before me, Rahila Bashir, personally appeared who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the state of Florida that

The foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Linda M. Radencic

Notary Public

Linda M. Radencic

Print

Affiant's Signature: [Signature]

Date 9-5-23 (SEAL)

