

Return

CLERK OF THE COURT
Jillian Steptoe
District Clerk
PO Box 549
Groveton, TX 75845

Attorney for Petitioner
Pro Se

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org."

TO: KELLE RAHM, 162 MANOR DR., TRINITY, TX 75862 OR WHEREVER (S)HE MAY BE FOUND

GREETINGS: You are commanded to appear by filing a written answer to the **258TH** Judicial District at or before 10:00 o'clock a.m. of the Monday next after the expiration of 20 days after the date of service hereof, before the **258TH** District Court of Texas, at the Courthouse in Groveton, Texas.

Said: PLAINTIFFS ORIGINAL PETITION was filed on **APRIL 29, 2025**.

The file number of said suit being **24665**

The style of the case is:

JENNIFER KAY HARRIS AND MICHAEL EDWARD ANTHONY HARRIS
VS.
KELLE RAHM AND KELLY HARRELL

A copy of the petition accompanies this citation.

Issued on **APRIL 29, 2025**

GIVEN UNDER MY HAND AND SEAL OF SAID COURT, at office in Groveton, Texas, on **APRIL 29, 2025**



Jillian Steptoe, District Clerk
258th District Court
Trinity County, Texas

By: Leon Vazquez Deputy

executed when copy is delivered:

This is a true copy of the original citation, was delivered to defendant _____, on the _____ day of _____, 20____.

_____, Officer
_____, County, Texas
By: _____, Deputy

JENNIFER KAY HARRIS AND MICHAEL EDWARD ANTHONY HARRIS
VS.
KELLE RAHM AND KELLY HARRELL

OFFICERS RETURN

Came to hand on the _____ day of _____, 20____, at _____, o'clock _____, m., and executed in _____ County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the plaintiff's petition, at the following times and places, to-wit:

Name	Date/Time	Place, Course and Distance from Courthouse
------	-----------	--

_____	_____	_____
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And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being: _____ 3

and the cause or failure to execute this process is: _____ 3

and the information received as to the whereabouts of said defendant(s) being: _____ 3

FEES:

Serving Petition and Copy \$ _____

Total \$ _____

_____, Officer
_____, County, Texas

By: _____, Deputy

Affiant

***Rule 107 Verification:** Subscribed and sworn to by the above named _____ before me this the _____ day of _____, 20____, to certify which witness my hand and seal of office.

Person Administering Oath

serve

CLERK OF THE COURT

Jillian Steptoe
District Clerk
PO Box 549
Groveton, TX 75845

Attorney for Petitioner

Pro Se

THE STATE OF TEXAS

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Jillian Steptoe, District Clerk
258TH District Court
Trinity County, Texas

By: Leon Vanquay Deputy

CAUSE NO. 24665
IN THE 258th JUDICIAL DISTRICT COURT
TRINITY COUNTY, TEXAS

FILED
AT 11:20 O'CLOCK 4 M
APR 29 2025

Jillian Steptoe
District Clerk, Trinity, Co.

JENNIFER KAY HARRIS and MICHAEL EDWARD ANTHONY HARRIS,

Plaintiffs,

v.

KELLE RAHM and KELLY HARRELL,

Defendants.

PLAINTIFFS ORIGINAL PETITION



TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Jennifer Kay Harris and Michael Edward Anthony Harris, Plaintiffs, and file this Original Petition complaining of Kelle Rahm and Kelly Harrell, Defendants, and respectfully show the Court as follows:

I. DISCOVERY LEVEL

Plaintiffs intend to conduct discovery under Level 2 pursuant to Texas Rule of Civil Procedure 190.3.

II. PARTIES

Plaintiffs are individuals residing at 136 E Big Lake Road, Trinity, Texas 75862. Plaintiffs own real property described as Lot Fourteen (14), Block No. B of the CAMP BRANCH ACRES SUBDIVISION in Trinity County, Texas.

Defendants are individuals who reside or own property in Trinity County, Texas. Kelle Rahm resides at 162 Manor Drive; Trinity, TX 75862. Kelly Harrell resides at 346 Lakeside Circle; Trinity, TX 75862.

III. JURISDICTION AND VENUE

This Court has jurisdiction because Plaintiffs seek declaratory and injunctive relief and potential damages exceeding the minimum jurisdictional limits of the district court.

Venue is proper in Trinity County, Texas, under Section 15.002(a)(1) of the Texas Civil Practice & Remedies Code.

IV. FACTUAL BACKGROUND

Plaintiffs are members of the unincorporated nonprofit association Camp Branch Acres Property Owners Association.

On May 28, 2024, Defendants filed a Certificate of Formation for an unauthorized Texas nonprofit corporation using the unincorporated nonprofit association's name or likeness without a vote from either the established board of directors of the unincorporated nonprofit association or a property owner vote. This action was inconsistent with the governing documents of the unincorporated nonprofit association and the Texas Residential Property Owners' Protection Act.

The establishment of this corporation was not disclosed to the property owners' association (board members or property owners) until a property owner discovered it in September of 2024.

Defendants listed directors on their corporate formation document without their consent, solicited donations in the name of charity, demanded property dues be paid to the corporation, and represented the corporation as legitimate, causing reputational and organizational harm.

V. CAUSES OF ACTION

- Declaratory Judgment
- Permanent Injunction
- Judicial Dissolution
- Prohibition against reinstatement
- Recognition of unincorporated nonprofit association
- Breach of fiduciary duty (if proven)

VI. DAMAGES

plaintiffs seek nominal and actual damages as appropriate, and attorneys fees as permitted by law.

VII. REQUEST FOR DISCLOSURE

Pursuant to Texas Rule of Civil Procedure 194, Plaintiffs request that Defendants serve their Initial Disclosures within 30 days after the filing of their answer.

VIII. PRE-SUIT ACTIONS

Prior to filing this lawsuit, Plaintiffs filed complaints with the Texas Secretary of State and the Texas Attorney Generals Office.

Plaintiffs also offered to resolve the matter by allowing Defendants to put the corporate formation to a valid property owner vote, but Defendants declined. Plaintiffs offered to mediate, but Defendants declined that as well.

IX. PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs Jennifer Kay Harris and Michael Edward Anthony Harris respectfully pray that Defendants be cited to appear and answer herein, and that upon final hearing, the Court grant judgment in favor of Plaintiffs and award:

1. A declaratory judgment invalidating the Certificate of Formation filed on May 28, 2024;
2. Injunctive relief barring further use of the unauthorized corporations authority or name;
3. Judicial dissolution of Camp Branch Acres Subdivision Property Owners Association, a Texas Nonprofit Corporation;
4. An order prohibiting reinstatement of the dissolved entity or formation of any substantially similar entity without a valid property owner vote;
5. A declaration affirming that Camp Branch Acres Property Owners Association continues as the lawful unincorporated nonprofit association, free from interference by Defendants;
6. Nominal or actual damages as appropriate;
7. Costs of court and reasonable attorneys fees;

All such other and further relief, at law or in equity, to which Plaintiffs may be justly entitled.

Respectfully submitted,

Jennifer Kay Harris

Michael Edward Anthony Harris

136 E Big Lake Road

Trinity, Texas 75862

(702) 337-3738 (Jennifer)

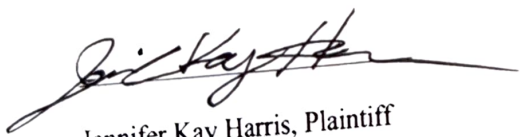
(702) 613-2790 (Michael)

jenharristx@gmail.com (Jennifer)

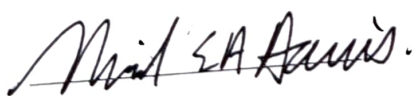
meharristx@gmail.com (Michael)

Pro Se Plaintiffs

Signatures:



Jennifer Kay Harris, Plaintiff



Michael Edward Anthony Harris, Plaintiff

FILED
AT 11:55 O'CLOCK AM

APR 29 2025

Jillian Steptoe
District Clerk, Trinity, Co.