

CAUSE NO. 352-248169-10

BAT WORLD SANCTUARY
and AMANDA LOLLAR

v.

MARY CUMMINS

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IN THE DISTRICT COURT

352ND JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

**PLAINTIFF'S RESPONSE TO MOTION FOR CONTEMPT OF COURT,
FORGERY, FRAUD**

TO THE HONORABLE JUDGE OF THE COURT:

Plaintiff, Amanda Lollar, files this Response to Defendant's "Motion for Contempt of Court, Forgery, Fraud" and will show the following:

I.

Bank records authorization

On December 8, 2015 this Court signed an Amended Order Granting Motion for Bank Records Authorization which ordered Defendant to sign an authorization allowing Plaintiff to obtain Defendant's bank records. *See Exhibit 1.* Defendant eventually signed an authorization which had been drafted by Plaintiff's attorney using the exact language ordered by the Court. *See Exhibit 2.*¹ On January 7, 2016 Plaintiff's attorney mailed copies of the signed authorization to certain banks requesting Defendant's bank records. *See Exhibit 3.* On January 21, 2016 First Bank, one of Defendant's banks, mailed Plaintiff's attorney copies of Defendant's bank records. *See Exhibit 4.* Plaintiff's attorney promptly forwarded copies of these records to Defendant as required by the Court's order.

¹ Defendant's signature on the authorization was so different from her usual signature that it appeared to be a crude forgery.

II.

Animal Advocates' bank records

On February 12, 2016 Plaintiff's attorney received a letter from First Bank informing him that Defendant had complained to the bank because it had sent him records pertaining to an organization called "Animal Advocates." See Exhibit 5. Defendant claims Animal Advocates is a "non-profit" organization run by her. First Bank had included Animal Advocates' records among the records it sent to Plaintiff's attorney because Defendant is "an authorized signatory" on the Animal Advocates account. *Id.*

Neither Plaintiff nor her attorney ever requested any records pertaining to Animal Advocates. No such request for these records was ever made in writing, by telephone, email or any other means of communication. These records were sent by the bank in direct response to a specific, limited request for "records pertaining to any accounts of Mary Cummins under her social security number [REDACTED]."

III.

Animal Advocates is Defendant's piggy bank

An examination of the Animal Advocates' bank records immediately reveals why Defendant does not want Plaintiff or this court to see these records. The bank records show that for several years Defendant has been systematically withdrawing thousands of dollars from the Animal Advocates account for her personal and private use. Funds which were donated to this "non-profit" organization have been used by Defendant to purchase such things as services at a weight loss clinic, lip plumping, a financial advisor, liquor, haircuts, fast food, real estate expenses, an actress listing for Mary Cummins in IMDB, ancestry.com, peoplefinder.com, and personal legal expenses. The records show that Defendant uses Animal Advocates as a veritable

piggy bank to siphon off funds that were intended by donors to go to a tax-exempt, non-profit organization. This is why Defendant does not want any bank records to be viewed by this Court or introduced into evidence in any court proceeding. Defendant has repeatedly sworn under penalty of perjury that she is indigent and has no assets or income. The bank records conclusively prove otherwise. They are available for an *in camera* inspection.

IV.

Defendant's claims of "forgery and fraud" have been made by her against many others

The post-judgment collection efforts by Plaintiff in this case are to collect on a \$6 million judgment against Defendant for defamation. Judge William Brigham, who presided at the trial announced at the conclusion of the trial that Defendant's lies about Plaintiff were "egregious as well as malicious as well as intentional." See Exhibit 6. Defendant has a long history of publically accusing others of forgery, fraud and other misconduct, including the following accusations she has made against individuals²:

- **Judge Bill Brigham**: "committed fraud upon the court" and was "cheating in court."³ See Exhibit 7.
- **Judge Bonnie Sudderth**: is a "lied in court," and "committed perjury in court to help her pedophile brother." See Exhibit 8.
- **Judge Jeff Walker**: committed "perjury in court." See Exhibit 9.
- **Justice Lee Ann Dauphinot**: "flat out lied" and "committed perjury in her opinion." See Exhibit 10.
- **Supreme Court Justice Don Willett**: is "EXTREMELY corrupt" and "promotes listeria- infected Blue Bell ice cream in exchange for...?" See Exhibit 11.

² This is only a tiny sample of public accusations of criminal activity and misconduct that Defendant has made against countless attorneys, judges, and other individuals and organizations.

³ Defendant made these allegations in a complaint she filed against Judge Brigham with the Texas State Commission on Judicial Conduct. The complaint was promptly dismissed.

- **Mary Cummins' mother**: “committed fraud” and was “stealing from me.” See Exhibit 12.

WHEREFORE, Plaintiff, Amanda Lollar prays that Defendant’s motion be denied and that Plaintiff recover reasonable and necessary attorney’s fees from Defendant for filing a frivolous motion and for discovery abuse.

Respectfully submitted,

/s/ Randall E. Turner
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CERTIFICATE OF SERVICE

In accordance with Rule 21a of the Texas Rules of Civil Procedure, I hereby certify that a true and correct copy of the above and foregoing document has been served electronically through the electronic filing manager to the email address of the following party or attorney whose email address is on file with the electronic filing manager:

Mary Cummins at mmmaryinla@aol.com

/s/ Randall E. Turner