

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA



Cause Number: 26-04-45491-MCVAJA
(The Clerk's office will fill in the Cause Number when you file this form)

Plaintiff: Enrique Diaz
(Print first and last name of the person filing the lawsuit.)

In the (check one):
 District Court
 County Court / County Court at Law
 Justice Court

And
Defendant: Ramsey English County et al Eagle Pass Texas
(Print first and last name of the person being sued.) County

Statement of Inability to Afford Payment of Court Costs
or an Appeal Bond in Justice Court

1. Your Information

My full legal name is: Enrique Diaz My date of birth is [REDACTED]
First Middle Last Month/Day/Year

My address is: (Home) [REDACTED]
(Mailing) [REDACTED]

My phone number: [REDACTED] My email: [REDACTED]

About my dependents: "The people who depend on me financially are listed below."

Name	Age	Relationship to Me
1 <u>Myself</u>		
2		
3		
4		
5		
6		

2. Are you represented by Legal Aid?

I am being represented in this case for free by an attorney who works for a legal aid provider or who received my case through a legal aid provider. I have attached the certificate the legal aid provider gave me as 'Exhibit: Legal Aid Certificate.'

-or-

I asked a legal-aid provider to represent me, and the provider determined that I am financially eligible for representation, but the provider could not take my case. I have attached documentation from legal aid stating this.

or-

I am not represented by legal aid. I did not apply for representation by legal aid.

3. Do you receive public benefits?

I do not receive needs-based public benefits. - or -

I receive these public benefits/government entitlements that are based on indigency:
(Check ALL boxes that apply and attach proof to this form, such as a copy of an eligibility form or check)

- Food stamps/SNAP TANF Medicaid CHIP SSI WIC AABD
- Public Housing or Section 8 Housing Low-Income Energy Assistance Emergency Assistance
- Telephone Lifeline Community Care via DADS LIS in Medicare ("Extra Help")
- Needs-based VA Pension Child Care Assistance under Child Care and Development Block Grant
- County Assistance, County Health Care, or General Assistance (GA)
- Other: _____

FILED
AT 10:30 O'CLOCK A M

APR 14 2026

LEOPOLDO YIELMA
District Clerk, Maverick County, Texas
By: [Signature] Deputy

4. What is your monthly income and income sources?

"I get this monthly income:

\$ 2014 in monthly wages. I work as a 0 for 0.
Your job title Your employer

\$ _____ in monthly unemployment. I have been unemployed since (date) _____.

\$ _____ in public benefits per month.

\$ _____ from other people in my household each month: *(List only if other members contribute to your household income.)*

\$ _____ from Retirement/Pension Tips, bonuses Disability Worker's Comp
 Social Security Military Housing Dividends, interest, royalties
 Child/spousal support
 My spouse's income or income from another member of my household *(if available)*

\$ _____ from other jobs/sources of income. *(Describe)* _____

\$ _____ is my **total monthly income**.

5. What is the value of your property?

"My property includes:

	Value*
Cash	\$ <u>400.</u>
Bank accounts, other financial assets	\$ _____
_____	\$ _____
_____	\$ _____
Vehicles (cars, boats) <i>(make and year)</i>	
<u>2014 Domett</u>	\$ <u>500.</u>
<u>2017 Acadia</u>	\$ <u>4000.</u>
<u>2017 Sport</u>	\$ <u>5000.</u>
Other property (like jewelry, stocks, land, another house, etc.)	
_____	\$ _____
_____	\$ _____
_____	\$ _____
Total value of property	→ \$ _____

6. What are your monthly expenses?

"My monthly expenses are:

	Amount
Rent/house payments/maintenance	\$ <u>500.</u>
Food and household supplies	\$ <u>400.</u>
Utilities and telephone	\$ <u>250.</u>
Clothing and laundry	\$ <u>100.</u>
Medical and dental expenses	\$ <u>150. Approx</u>
Insurance (life, health, auto, etc.)	\$ <u>200.</u>
School and child care	\$ _____
Transportation, auto repair, gas	\$ <u>3000.</u>
Child / spousal support	\$ _____
Wages withheld by court order	\$ _____
Debt payments paid to: <i>(List)</i>	\$ _____
_____	\$ _____
_____	\$ _____
Total Monthly Expenses	→ \$ <u>3600.</u>

*The value is the amount the item would sell for less the amount you still owe on it, if anything.

7. Are there debts or other facts explaining your financial situation?

"My debts include: *(List debt and amount owed)* Hospital about \$15,000.

(If you want the court to consider other facts, such as unusual medical expenses, family emergencies, etc., attach another page to this form labeled "Exhibit: Additional Supporting Facts.") Check here if you attach another page.

8. Declaration

I declare under penalty of perjury that the foregoing is true and correct. I further swear:

- I cannot afford to pay court costs.
- I cannot furnish an appeal bond or pay a cash deposit to appeal a justice court decision.

My name is Enriquez Diaz My date of birth is _____

My address is _____
City State Zip Code Country

Enriquez Diaz signed on 04/14/2016 in Macondo County, TX.
Signature Month/Day/Year county name State

-----4CAUSE NO. 26-04-45991-MCVAJA

ENRIQUETA DIAZ, PRO SE X IN THE DISTRICT COURT
Plaintiff

vs

X 365th JUDICIAL DISTRICT

MAVERICK COUNTY

COMMISSIONER'S COURT:

Defendants: RAMSEY ENGLISH CANTU-MAVERICK COUNTY JUDGE,
YOLANDA RAMON-Maverick County Commissioner Precinct 1,
ROSANNA RIOS-Maverick County Commissioner Precinct 2, OLGA
RAMOS-Maverick County Commissioner Precinct 3, and
ROBERTO RUIZ-Maverick County Commissioner Precinct 4

X MAVERICK COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION AND APPLICATION FOR
TEMPORARY RESTRAINING ORDER AND TEMPORARY INJUNCTION

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff files this Original Petition and Application for Temporary
Restraining Order and Temporary Injunction complaining of Defendants
and would respectfully show:

I

DISCOVERY CONTROL PLAN

Plaintiff intends that discovery be conducted under Level 2 of Texas
Rule of Civil Procedure 190.

FILED
AT 10:37 O'CLOCK A M

APR 14 2026

LEOPOLDO VIELMA
District Clerk Maverick County, Texas
By [Signature] Deputy

II

PARTIES

Plaintiff Enriqueta Diaz is a resident of Maverick County, Texas and has standing as a member of the public affected by violations of the Texas Open Meetings Act.

Defendant Maverick County, Texas is a political subdivision of the State of Texas and may be served through the County Judge Ramsey English Cantu.

Defendant Maverick County Commissioners Court is the governing body of Maverick County.

III

JURISDICTION AND VENUE

This Court has jurisdiction under the Texas Constitution and Texas Government Code Chapter 551. Venue is proper in Maverick County, Texas.

IV

FACTUAL BACKGROUND

The Maverick County Commissioners Court posted notice of a Special Meeting scheduled for April 14, 2026 at 3:00 p.m.

The agenda includes Item 49, which states:

"Discussion and Appropriate Action to approve memorandum of understanding with Puerto Verde Global Trade Bridge."

The agenda provides no further description of the nature, scope, financial impact, obligations, or legal consequences of the proposed memorandum of understanding.

The proposed action involves a matter of substantial public importance, potentially including contractual obligations, financial exposure and policy commitments by Maverick County.

Despite this, the notice fails to inform the public of the subject matter in sufficient detail to allow meaningful participation or understanding.

V

VIOLATION OF TEXAS OPEN MEETINGS ACT

Under Texas Government Code 551.041, a government body must give written notice of the date, hour, place and subject of each meeting.

The Texas Supreme Court has held that the notice must be sufficiently specific to alert the public to the subject to be considered.

The description of Item 49 is vague and fails to disclose:

- * The material terms of the memorandum of understanding.
- * The financial implication for Maverick County.
- * The identity and nature of Puerto Verde Global Trade Bridge.
- * The scope and duration of any obligation to the taxpayers of Maverick County.
- * The cost of public funds involved
- * Maverick County's property tax increase for infrastructure
- * Why this MOU is with cross border/private entity
- * A copy of the contract or agreement Maverick County has with Puerto Verde Global Trade Bridge investor Ruben Garibay

As a result, the notice is legally insufficient and violates the Texas Open Meetings Act.

VI

IRREPARABLE HARM

If Defendants are not restrained, they will proceed to consider and potentially approve Item 49 in violation of the Texas Open Meetings Act.

Such action would:

- * Deprive the public of their statutory right to notice and participation.
- * Result in unlawful governmental action.
- * Cause harm that cannot be adequately remedied by monetary damages.
- * Irreparable damage and liability to the taxpayers of Maverick County.
- * It would be a violation of US Constitutional Rights of the people being denied federal and state statutes, most notably the Freedom of Information Act (FOIA) (5 USC 52).

VII

REQUEST FOR TEMPORARY RESTRAINING ORDER

Plaintiff requests that the Court issue a Temporary Restraining Order restraining Defendants from:

- * Considering
- * Deliberating on
- * Voting upon

Item 49 of the April 14, 2026 agenda unless and until proper notice is provided in compliance with the Texas Open Meetings Act.

Immediate and irreparable injury will occur before notice can be served and a hearing held.

VIII

REQUEST FOR TEMPORARY INJUNCTION

Plaintiff further requests that, upon hearing, the Court issue a Temporary Injunction prohibiting Defendants from taking action on Item 49 until lawful notice is given.

IX

ATTORNEYS FEES

Plaintiff seeks recovery of attorney's fees and costs under Texas Government Code 551.142.

X

LEGAL AUTHORITY SUPPORTING INJUNCTIVE RELIEF

The Texas Open Meetings Act expressly authorizes injunctive relief to prevent violations. Tex. Gov't Code 551.142(a) provides that "an interested person may bring an action to stop, prevent, or reverse a violation." Texas Courts have consistently held that governmental bodies must provide notice that is sufficiently specific to inform the public of the subject matter to be considered.

In *COX ENTERPRISES, INC. v. BOARD OF TRUSTEES*, 706 S.W.2d 956,959 (Tex. 1986), the Texas Supreme Court held that notice must be "sufficiently specific to alert the general public to the subject to be considered." General or vague descriptions are insufficient when the action contemplated is of **SIGNIFICANT PUBLIC INTEREST**.

Similarly, in *ACKER v. TEXAS WATER COMMISSION*, 790 S.W.2d 299,300 (Tex. 1990), the Court reaffirmed that the Act requires meaningful notice, not mere labels or broad descriptions that fail to inform the public of the substance of the action.

Texas appellate courts have further confirmed that injunctive relief is appropriate to prevent anticipated violations of the Act. See **POINT**

ISABEL ISD v. HINOJOSA, 797 S.W.2d 176, 182 (Tex. App. - Corpus Christi 1990, writ denied). (recognizing injunctive relief as proper to restrain violations of TOMA before they occur).

Additionally, in RIVERA v. CITY OF LAREDO, 948 S.W.2d 787 (Tex. App. - San Antonio 1997, writ denied), the court held that insufficient agenda notice constitutes a violation of TOMA and supports judicial intervention.

Because Item 49 fails to disclose the nature, scope, and implications of the proposed memorandum of understanding, Plaintiff has demonstrated a probable right to relief and is entitled to injunctive relief preventing Defendants from proceeding without lawful notice.

X

EX PARTE

Plaintiff requests that Applicant requests that the Court set this matter for an ex parte hearing and issue a Temporary Restraining Order without notice to Respondent. Immediate and irreparable injury will result before notice can be served and a hearing held because Respondent's conduct is ongoing and poses a substantial risk of immediate harm: dissipation of assets, destruction of property, interference with business operations, or threats to safety. Providing advance notice would likely enable Respondents to take further harmful actions, including concealing, transferring, or destroying property or otherwise frustrating the Court's ability to grant effective relief.

Accordingly, Applicant respectfully requests that the Court grant ex parte relief to preserve the status quo pending a full hearing.

XI

PRAVER

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that Defendants be cited to appear and answer and that upon final hearing:

- * A Temporary Restraining Order be issued;
- * A Temporary Injunction be granted;
- * Defendants be enjoined from acting on Item 49 without proper notice;
- * Plaintiff recover attorney's fees and costs; and
- * Plaintiff receive all other relief to which she may be justly entitled.

Respectfully submitted,

Enriqueta Diaz
Enriqueta Diaz, Plaintiff PRO SE

[REDACTED]
[REDACTED]
[REDACTED]