

CAUSE NO. 23-11468-431

CARRIE de MOOR, M.D.,	§	IN THE DISTRICT COURT
	§	
<i>Plaintiff,</i>	§	
	§	
vs.	§	
	§	
BRENT ALLISON HAGENBUCH,	§	DENTON COUNTY, TEXAS
MATT RINALDI, IN HIS CAPACITY	§	
AS CHAIRMAN OF THE	§	
REPUBLICAN PARTY OF TEXAS,	§	
THE REPUBLICAN PARTY OF	§	
TEXAS, AND JANE NELSON, TEXAS	§	
SECRETARY OF STATE,	§	
	§	
<i>Defendants.</i>	§	431 st JUDICIAL DISTRICT

**PLAINTIFF’S AMENDED VERIFIED PETITION FOR DECLARATORY
JUDGMENT AND REQUEST FOR TEMPORARY RESTRAINING
ORDER AND TEMPORARY INJUNCTION**

Like when deceased voters in the Rio Grande Valley lined up to vote in alphabetical order for Lyndon Johnson, Defendant Brent Hagenbuch (“Hagenbuch”) expects voters to avert their eyes and accept his unique, personal form of election cheating. Public records, his own candidate application, and common sense all demonstrate he has lied about his residence to qualify as a candidate for office in Texas Senate District 30 (“SD 30”), where he does not live.

The Texas primary election is scheduled for March 5, 2024, and the SD 30 candidates are scheduled to draw straws on December 21, 2023 to determine their

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order on the Denton County ballots. The ballot printing will begin shortly thereafter. Consequently, time is of the essence and, given the obvious and fatal flaws on the face of Hagenbuch's application (as explained below), if ballots are printed with Hagenbuch's name on them and/or if Hagenbuch is allowed to participate in and vie for the primary election, it will dilute votes, cause voter confusion, and impact the outcome of the primary election. Further, depending on the primary's outcome, there is the risk that a fatally flawed candidate will be placed on the ballot for SD 30 in the general election for November 2024.

Therefore, Plaintiff Carrie de Moor, M.D. ("Plaintiff" or "Dr. de Moor") files this Original Verified Petition for Declaratory Judgment and Request for Temporary Injunction seeking swift judicial action to prevent Hagenbuch from capitalizing on his obvious violations of Texas Election Law.

SUMMARY OF KEY LAW AND FACTS

A. Hagenbuch's Residency Facts Based on Public Records

1. Hagenbuch purchased his home at 1504 Highland Circle, Little Elm, Texas 75068-3767 on May 30, 2017. He claimed a homestead exemption for this property. See Exhibit 2, Denton County Appraisal District records.

2. Hagenbuch voted in Senate District 12 on October 29, 2023 for the November 7, 2023 constitutional election. Exhibit 3, Hagenbuch's proof of voting.

According to his proof of voting, his assigned precinct for that election was 2075. According to the Texas Legislative Council's Precincts by District, Precinct 2075 is in SD 12. Exhibit 4, Texas Secretary of State, Texas Legislative Council's Precinct by District.

3. In his sworn application to be a candidate for SD 30 that he signed on November 16, 2023, Hagenbuch made multiple, fatal admissions that disqualify him as an SD 30 candidate. See Exhibit 1, Hagenbuch's Application. First, Hagenbuch stated he had lived in SD 30 for "1 1/2" months as of November 16, 2023. *Id.* Working backwards, and for Hagenbuch's sworn statement to be true, he had to have lived in SD 30 since October 5, 2023 (six weeks or a month and a half from November 16, 2023). However, consistent with his never-changing address, Hagenbuch voted in SD 12 on October 29, 2023 (see Exhibit 3).

4. To vote in Texas, voters must affirm to an election judge their identity and address. They must present acceptable identification and affirmatively state the address on the identification they present is correct. If they cannot so affirm, they will be redirected or provided with a different ballot. The fact Hagenbuch successfully voted in SD 12 as recently as October 29, 2023 - weeks after his application for candidacy claims he moved to SD 30 - (here, we are discussing what Hagenbuch swore was true on his application and when voting, not whether his statements

independently can be true) – means he presented himself to vote in SD 12 and said he lived in SD 12, although he now says he resided in SD 30 when he made that claim.¹

5. Hagenbuch committed a second fatal error in his application (Exhibit 1) by listing his purported address in SD 30 as 2800 Shoreline Drive, Denton, Texas. However, that address is an office building in which Titus Transport Holdings, LLC, a company owned by Hagenbuch, has a recently-started lease. The building, and all the leases therein, has a “B” property code or occupancy designation from the City of Denton, meaning it is approved for a Business Occupancy only. According to the Certificate of Occupancy, that space is not approved for residential use or even a mixed business/residential use.

6. Importantly, the City of Denton did not issue its Certificate of Occupancy for Titus Transport Holdings LLC at 2800 Shoreline Drive until October 23, 2023 – more than two weeks after Hagenbuch’s sworn statement in his

¹ This creates the classic, “Were you lying then or are you lying now?” dilemma for Hagenbuch. Although where a person is registered to vote, or actually votes, is itself not dispositive of that person’s “residence,” it is a persuasive factor for the Court to consider. So, too, a person’s truthfulness is always relevant. Regardless of where Hagenbuch lives now, this Court is called upon to decide whether his candidate application, on its face and using only public records to evaluate arguments for and against, is sufficient to allow him to continue as a candidate. In making that determination, the Court must weigh the evidence against the statements of Hagenbuch, a proven prevaricator.

application that he had lived there since October 5, 2023. Exhibit 7, Certificate of Occupancy for 2800 Shoreline issued by the City of Denton.

7. By operation of law (City Ordinance), Hagenbuch's claim to have "resided" at 2800 Shoreline Drive since October 5, 2023 is impossible because (a) the occupancy type was not residential, and (b) the Certificate of Occupancy was not approved until October 23, 2023. Hagenbuch could not have "resided" or even occupied the building at 2800 Shoreline Drive until and unless the City of Denton issued its Certificate of Occupancy, which was not approved until October 23, 2023.

8. Further, Hagenbuch camouflaged his deception by omitting a suite number within the building located at 2800 Shoreline Drive. This is not an error or mere oversight: a suite number would constitute an acknowledgement (and perhaps a tip to an opponent) the building is commercial. Hagenbuch, as the immediate past Chairman of the Denton County Republican Party and the official charged with accepting or rejecting candidate applications for county offices, knows this, as he well knows the requirements for candidate eligibility.

9. Moreover, according to the City of Denton's records, when Hagenbuch applied on October 17, 2023 for the Certificate of Occupancy concerning the 2800 Shoreline Drive address, he listed his current address as 1504 Highland Circle, Little Elm, Texas 75068-3767. Exhibit 9, City of Denton Permit Applications Page.

This again shows Hagenbuch made a false sworn statement in his candidate application that he “resided” at 2800 Shoreline for “1 ½” months as of November 16, 2023 (i.e., as of October 5, 2023) by representing to the City of Denton that his address was in 1504 Highland Circle in Little Elm as of October 17, 2023.

B. “Residency”

6. Article 3, Section 6 of the Texas Constitution requires a candidate for the Texas Senate to have resided in the senate district for at least one year immediately preceding the election, and to have resided in Texas for at least five years immediately preceding the election. Hagenbuch is an illegitimate candidate for SD 30 because he cannot establish his residency in this district as of November 5, 2023 – one year before the election scheduled for November 5, 2024.

7. Texas Election Code, Section 1.015(a) defines “residence” to mean “domicile, that is, one’s *home and fixed place of habitation* to which one intends to *return* after any temporary absence.” [Emphasis added]. Texas Election Code, Section 1.015(b) states a “person may not establish residence for the purpose of influencing the outcome of a certain election.” Texas Election Code, Section 1.015(d) also provides that a “person does not acquire a residence in a place to which the person has come for temporary purposes only and *without the intention of making that place the person’s home*.” [Emphasis added]. Texas Election Code, Section 1.015(e) further

dictates that a “person may not establish a residence at any place the person has not inhabited. A person may not designate a previous residence as a home and fixed place of habitation unless the person inhabits the place at the time of designation and intends to remain.”

8. The Texas Supreme Court has stated that “volition, intention and action” are “equally pertinent” elements to consider when ascertaining residency under Texas Election Code, Section 1.015. “Neither bodily presence alone nor intention alone will suffice to create the residence, but when the two coincide at that moment the residence is fixed and determined. *Mills v. Bartlett*, 377 S.W.2d 636, 637 (Tex. 1964). Thus, under the statute the focus is on the “home and fixed place of habitation,” and where the person sleeps and keeps clothes and furniture, and the length of time spent in the alleged residence are relevant factors. *See, e.g., Guerra v. Pena*, 406 S.W.2d 769, 776-77 (Tex.Civ.App. – San Antonio 1966, no writ) (applying Section 1.015 of the Texas Election Code to voters). Additionally, and while not dispositive, a candidate’s designation of a homestead outside a particular voting district is relevant to consideration of residence. *In re Peacock*, 421 S.W.3d S.W.3d 913, 917 (Tex. App. – Tyler 2014, orig. proceeding).

9. Nothing in the foregoing statutes and court opinions lends itself to the credible conclusion Hagenbuch lives in SD 30. When applying the facts already

detailed, and others mentioned below, to the applicable election law, it is clear – to his credit – that Hagenbuch is not an especially accomplished cheater. His candidacy is fatally defective, entitling Dr. de Moor to a temporary restraining order, temporary injunction, permanent injunction and declaratory relief that Hagenbuch cannot participate in or vie as a candidate for SD 30.

I. DISCOVERY CONTROL PLAN

10. Consistent with Rule 190.4 of the Texas Rules of Civil Procedure, Dr. de Moor requests that an appropriate scheduling order be entered after Hagenbuch has appeared and answered herein. Notwithstanding the foregoing, Dr. de Moor is concurrently requesting an expedited discovery schedule.

II. CLAIM FOR RELIEF

11. Consistent with Texas Rule of Civil Procedure 47, Dr. de Moor seeks non-monetary, injunctive and declaratory relief.

III. PARTIES

12. Plaintiff, Dr. de Moor, is an individual residing in Frisco, Collin County, and is a citizen of the State of Texas. She is also a licensed physician, board certified in emergency medicine, and has filed an Application for a Place on the General Primary Ballot for the Republican Party to be held in 2024 for Texas Senate District 30 (“SD 30”).

13. Defendant, Brent Allison Hagenbuch is an individual residing at 1504 Highland Circle, Little Elm, Denton County and has also filed an Application for a Place on the General Primary Ballot for the Republican Party to be held in 2024 for SD 30. Defendant Hagenbuch may be served with process at his residence located at 1504 Highland Circle, Little Elm, Denton County, Texas 75068.

14. Matt Rinaldi, in his capacity as the Chairman of the Republican Party of Texas, is a Texas resident who can be served with process and a copy of this pleading by serving him at 807 Brazos Street, Austin, Texas 78701.

15. The Republican Party of Texas is a political association that can be served with process and a copy of this pleading by serving Mr. Rinaldi, as its Chairman, at 807 Brazos Street, Austin, Texas 78701.

16. Jane Nelson, as the Texas Secretary of State, can be served with process and a copy of this pleading by serving her at 1100 Congress, Capitol Building, Room 1E.8, Austin, Texas 78701.

IV. JURISDICTION & VENUE

17. The Court has subject-matter jurisdiction over this dispute because the claims and damages sought are within the jurisdictional limits of this Court. The Court has personal jurisdiction over this dispute because Hagenbuch lives in Denton County.

18. Venue is proper under Section 15.002 of the Texas Civil Practice and Remedies Code because all or a substantial portion of the events giving rise to the claims asserted in this lawsuit occurred in Denton County, Texas; and also under Section 65.023 of the Texas Civil Practice and Remedies Code because Dr. de Moor seeks injunctive relief against Hagenbuch who lives in Denton County.

V. BACKGROUND

A. Overview

19. Hagenbuch is not eligible to be on the ballot for SD 30 because he was not a qualified resident of that district a year before the election, and even today it is doubtful he is a resident of the district at all. Regardless of where he lives, *his application on its face makes him ineligible for this office.* Texas law and the Texas Constitution impose residency requirements on putative Senate candidates. The application candidates complete and submit to qualify for the office requires the candidate to state how long he or she has lived in the district. To this qualifying or disqualifying question, Defendant Hagenbuch answered, “1 ½” months, meaning he moved into SD 30 on or around October 5, 2023.² Although that date certainly would qualify Defendant Hagenbuch as a resident of SD 30 more than a year before the election, the problem remained that he actually lived in SD 12.

² A true and correct copy of Hagenbuch’s application is attached as Exhibit 1.

20. To overcome the 12 mile barrier between where he lives and the district with an open Senate seat, Hagenbuch claimed his new office address as a residential address, and claimed in a sworn document dated November 16, 2023 that he had lived there for six weeks.³ He did this knowing he did not live in his office but planning his flim-flam would bamboozle everyone and he would appear to meet the requirement of Article 3, §6 of the Texas Constitution.

21. His protestations to the contrary, Hagenbuch lived, and still lives, 12 miles away in SD 12, in a home he and his wife bought in May 2017 and currently share. His home – his residence and domicile – are located at 1504 Highland Circle, Little Elm, Texas 75068.⁴ Moreover, he could not have lived at the office building as he claimed, even if the building were zoned for residential use and even if there were residential quarters in the building (which is not believed to be the case) because the City of Denton did not issue a certificate of occupancy until October 23, 2023 – three weeks *after* he claimed to have moved in.

22. Defendant Hagenbuch has thus far lied three times: once in order to claim residency in SD 30 but vote in SD 12, once by omitting any suite number from

³ *Id.*

⁴ See Exhibit 2, which are Denton County Appraisal District records showing Hagenbuch's residence.

his address in order to avoid drawing attention to the commercial nature of his “residence,” and once to claim he “resided” in SD 30 on or around October 5, 2023 when occupancy of the office his company leases could not have begun prior to October 23, 2023.⁵

23. Most lies require more lies, and Hagenbuch’s lies are no different. He soon found he had to complicate his misrepresentation with further false elaborations when the first lie proved insufficient.

24. Hagenbuch voted in SD 12 on October 29, 2023 in the November 7, 2023 constitutional election (before the incumbent announced his retirement, leaving the seat open),^{6,7} then changed his voter registration to his office address of 2800 Shoreline Drive on November 13, 2023 (shortly after the incumbent announced his retirement).⁸ Then, according to Denton County Election officials, he changed his voter address again on November 30, 2023, to 2801 Shoreline Drive, an apartment building across the street from the office building where he previously

⁵ The last one being a totally unnecessary falsehood – October 23 was more than a year from the election in 2024 and would do just as well as October 5.

⁶ Exhibit 3, which is Hagenbuch’s proof of voting on October 29, 2023.

⁷ Exhibit 4, Texas Legislative Council’s List of Precincts in SD 12.

⁸ Exhibit 5, November 13, 2023 Amended Texas Voter Registration.

swore he was living.⁹ However, according to public documents, he applied for a new driver's license issued on November 22, 2023 – using 2800 Shoreline Drive as his address.¹⁰

25. Hagenbuch has a homestead exemption on the home he and his wife own in SD 12.¹¹ He voted in SD 12, using the same address, for at least the last 17 elections.

B. Hagenbuch's Non-Residency Residency

26. Hagenbuch was the first candidate to file in SD 30. He signed an application to be a candidate on November 16, 2023, and had it notarized.¹² He submitted that application to the Republican Party of Texas (“RPT” or the “Party”) on November 17, 2023, and RPT accepted it on November 20, 2023 based on false information.

⁹ Exhibit 6, November 30, 2023 Amended Texas Voter Registration.

¹⁰ Exhibit 10, Texas Driver Detail.

¹¹ Exhibit 2.

¹² Exhibit 1.

27. In his application, Hagenbuch swore his permanent residence address was 2800 Shoreline Drive, Denton, Texas, 76210.¹³ This was the document in which he swore he had lived in SD 30 continuously for “1 ½” months prior to filing.¹⁴

28. 2800 Shoreline Drive in Denton is an office building. It is a Class A building rated for office/medical potential use. Hagenbuch received a Certificate of Occupancy on October 23, 2023, giving him permission to begin using the office space his companies lease there.¹⁵ Prior to that date, the City of Denton would not permit him to utilize space in the building. As shown on the Certificate of Occupancy, the leaseholder of the space Hagenbuch has claimed as his residence is Titus Transport Holdings, LLC, which public records indicate is an entity Hagenbuch owns. The Certificate of Occupancy also limits the approved use for the property to “Office,” and the space Titus Transport Holdings, LLC leases is categorized on the Certificate of Occupancy as “B,” meaning it is limited to business use, which necessarily excludes residential purposes.¹⁶

¹³ Exhibit 1. On November 13, 2023, Hagenbuch changed his voter registration to 2800 Shoreline Drive in Denton. Then, On November 30th, 2023, the Denton County Elections Office advises Hagenbuch changed his voter registration again, this time to 2801 Shoreline Drive in Denton. That address belongs to an apartment complex directly across the street from the building where his company leases office space.

¹⁴ Exhibit 1.

¹⁵ Exhibit 7, City of Denton Certificate of Occupancy for 2800 Shoreline Drive.

¹⁶ Exhibit 7.

29. Based on a search of SD 30 property records, Hagenbuch does not own property in SD 30. As previously shown, he and his wife do own a home located at 1504 Highland Cir., Little Elm, Texas 75068, in Denton County, which they purchased at the end of May 2017.¹⁷ The address for their home is in SD 12.¹⁸ Hagenbuch claims a homestead exemption on the Highland Circle property¹⁹ and, until November of 2023, used that home as his residence address for all purposes, including his driver's license and voter registration.²⁰

VI. ARGUMENT & AUTHORITIES

A. Relevant Texas Election Law on Residency Requirements:

30. Article 3, §6 of the Texas Constitution sets forth the residency qualifications for State Senate Candidates relevant to this challenge: a candidate for State Senate must (1) reside in Texas for at least five years immediately preceding the election and (2) reside in the senate district for at least one year immediately preceding the election.

¹⁷ Exhibit 2.

¹⁸ Exhibit 4.

¹⁹ Exhibit 2.

²⁰ See Exhibit 8, Hagenbuch's October 11, 2017 Voter Registration.

31. Texas Election Code, Section 1.015 states: In this code, “residence” means domicile, that is, one’s home and fixed place of habitation to which one intends to return after any temporary absence.

(a) A person may not establish residence for the purpose of influencing the outcome of a certain election.

(b) A person does not lose the person’s residence by leaving the person’s home to go to another place for temporary purposes only.

(c) A person does not acquire a residence in a place to which the person has come for temporary purposes only and without the intention of making that place the person’s home.

(d) A person who is an inmate in a penal institution or who is an involuntary inmate in a hospital or eleemosynary institution does not, while an inmate, acquire residence at the place where the institution is located.

(e) A person may not establish a residence at any place the person has not inhabited. A person may not designate a previous residence as a home and fixed place of habitation unless the person inhabits the place at the time of designation and intends to remain.

32. Texas Election Code, Sections §§145.003(f) and 145.003(g) provide as follows:

A candidate may be declared ineligible only if:

(f) (1) *the information on the candidate’s application for a place on the ballot indicates that the candidate is ineligible for the office;*

(f) (2) facts indicating that the candidate is ineligible are conclusively established by another public record; **or**

(g) When presented with an application for a place on the ballot or another public record containing information pertinent to a candidate's eligibility, the appropriate authority shall promptly review the record. If the authority determines that the record establishes ineligibility as provided by Subsection (f), the authority shall declare the candidate ineligible.

(Emphasis added).

B. APPLICATION

33. Historically, Texas law has been exceptionally liberal in defining "residence." Essentially, if a candidate claims an intent to return to a habitation, temporary absences from the electoral district – or even the State itself – can be disregarded, even those that last years. However, the circumstances of Hagenbuch's candidacy and the cynical steps he has taken to camouflage his ineligibility for SD 30 stretch even flexible Texas laws in this area beyond breaking. Hagenbuch has no legitimate claim to represent constituents in SD 30.

HAGENBUCH DOES NOT MEET MINIMUM REQUIREMENTS FOR DISTRICT RESIDENCY

34. Hagenbuch purchased his home – in SD 12 – in 2017. A review of county tax records for each county in SD 30 has disclosed that while he has lived *near* SD 30, he has not lived *in* SD 30, at least not in the last six and one-half years. In other words, if he does not live in SD 30 now and has not lived there since at least November 5, 2023, he is constitutionally barred from candidacy in SD 30 because he

cannot meet the minimum constitutional requirement that he live in the district for the year preceding the general election in which he seeks to run.

THE ADDRESS ON HIS APPLICATION IS FALSE AND DISQUALIFIES HIM

35. Defendant Hagenbuch can only be found ineligible if the information on his “application for a place on the ballot indicates that the candidate is ineligible for the office.” TEX. ELEC. CODE §145.003(f). That is exactly what Defendant Hagenbuch has presented.

36. By claiming residency in SD 30 for “1 ½” months, Hagenbuch made himself ineligible by swearing he resided in a place where he legally could not live at all (see below), let alone for the first two weeks he claimed. It is axiomatic that if one is to cheat one’s way into making a candidacy qualify for an election, one must at least do sufficient research to establish one’s putative “residence” is approved for occupancy by the city in a timely way. Hagenbuch did not, his “residence” was not, and now his candidacy does not.

37. Further, by claiming his residence was 2800 Shoreline Drive, Denton, Texas, Hagenbuch chose to claim as his home – the place where he (then) laid his head at night or where he has laid his head at night and intends to do so again – the single Class A *office building* in Denton. It is an *office building*, not an apartment building and not a mixed-use office/residential building. Although there is no dispute that his companies lease space in the building, it would require the complete suspension of disbelief and the utter absence of intellect to believe Hagenbuch has ever slept there in a bed, keeps his clothing there, has

family pictures on display, or shares the space with his wife. That is particularly true considering their real home, a \$1.1 million, 3,750 square foot, sprawling lakeside home, is 16 minutes away.

TEXAS ELECTION CODE: HE DOES NOT QUALIFY UNDER STATUTE

38. TEX. ELEC. CODE §1.015 contemplates a “residence’ means domicile, that is, one’s home and fixed place of habitation to which one intends to return after any temporary absence.” This statutory safe haven provides Hagenbuch no relief because outside his marital home in SD 12, he has no domicile – no home or fixed place of habitation – to which he intends to *return* after an absence. Said another way, for Hagenbuch’s application to pass scrutiny, the Court must accept as true that Hagenbuch 1) lives in an office building; 2) that is not designed for residential space in the Certificate of Occupancy; 3) that he intends to return to and reside in despite having his home of six years, that he has homesteaded and shares with his wife a mere 15-minute drive away. Further, the Court must believe these things to be true despite the facts disputing them, disregarding common sense, and based on only the claims Hagenbuch himself makes, assertions made by an individual whose ambition for office caused him to perjure himself and give rise to this lawsuit. Although statutes relating to candidate eligibility are generally construed in a manner favorable to the candidate, Hagenbuch has demonstrated he is not entitled to that deference.

To ignore the obvious would place form over substance and make a mockery of the laws governing basic fairness in elections.

HE VOTED IN SD 12 FOR THE NOVEMBER 7, 2023 ELECTION

39. Comparing Hagenbuch's sworn application statements to government voting records, Hagenbuch voted in the November 7, 2023 election in SD 12, just as he had for the preceding 17 elections, despite claiming to "reside" in SD 30 for more than (at the time he voted) three weeks.

VII. CAUSES OF ACTION

A. Declaratory Judgment.

40. Section 37.002 of the Texas Civil Practices and Remedies Code states that the purpose of the Declaratory Judgment Act is remedial. It is to settle and to afford relief from uncertainty and insecurity with respect to rights, status, and other legal relations. It is to be liberally construed and administered. Section 37.004 further states it applies to a person interested under a deed, will, written contract, or other writings constituting a contract or whose rights, status, or other legal relations are affected by a statute, municipal ordinance, contract, or franchise may have determined any question of construction or validity arising under the instrument, statute, ordinance, contract, or franchise and obtain a declaration of rights, status, or other legal relations thereunder.

41. Justifiable controversies exist between Dr. de Moor, Hagenbuch, and the other defendants.

42. For the foregoing reasons explained above, Dr. de Moor seeks a judicial declaration that Hagenbuch is not an eligible resident of SD 30 and cannot be a candidate in the upcoming primary to run for Texas Senate in SD 30.

B. Application and Request for Temporary Restraining Order and Temporary Injunction.

43. Plaintiff's request for injunctive relief is authorized by Chapter 65 of the Texas Civil Practice and Remedies Code.

44. It is substantially likely that Dr. de Moor will prevail in seeking Declaratory Judgment because the action is based on irrefutable facts.

45. As a direct and proximate result of Hagenbuch's application for SD 30 as alleged in this petition, Dr. de Moor has suffered and will continue to suffer imminent injury that will be irreparable and for which no remedy at law exists without the protections of a temporary restraining order and injunctive relief. Specifically, Hagenbuch's candidacy is illegitimate and will shift votes that would otherwise go to Dr. de Moor and/or other rightful candidates, thereby impacting the general primary election in March 2024. Worse, if Hagenbuch were to win the general primary, it would place an illegitimate candidate on the ballot for the general election in

November 2024, leaving him subject to challenge later and potentially disenfranchising many SD 30 voters.

46. The only adequate, effective, and complete relief to Dr. de Moor is to restrain the RPT from further engaging in certain proscribed activities, as set forth below.

47. Consistent with TEX. R. CIV. P. 680 et seq. and TEX. CIV. PRAC. & REM. CODE § 65.001 *et seq.*, and to preserve the status quo during the pendency of this action, Dr. de Moor seeks a temporary restraining order and, after a hearing, a temporary and permanent injunction, ordering and immediately restraining Hagenbuch and his agents, servants, employees, independent contractors, attorneys, representatives, and those persons or entities in active concert or participation with them (collectively, the “Restrained Parties”) from actively participating and vying for the SD 30 position in the 2024 general primary until such time as the Court orders otherwise; and (b) upon final trial, ordering permanent injunctive relief in the same form, and additionally prohibiting the Restrained Parties from actively participating in and vying for the SD 30 position in the 2024 general election, if it were to become applicable.

48. Plaintiff additionally requests a temporary restraining order and, after a hearing, a temporary and permanent injunction, ordering and immediately

restraining the Republican Party of Texas, the Texas Secretary of State, and their agents, servants, employees, independent contractors, attorneys, representatives, and those persons or entities in active concert or participation with them (collectively, the “Restrained Parties”) from placing Defendant Hagenbuch’s name on any ballot for the 2024 primary election.

49. Plaintiff should not be required to post anything other than a nominal bond because of the nature of this proceeding. Notwithstanding the foregoing, Dr. de Moor is willing to post a reasonable bond.

50. Plaintiff asks the Court to set her application for temporary injunction for hearing after authorizing expedited discovery and, after the hearing, issue a temporary injunction against the Restrained Parties as above requested.

51. Plaintiff has joined all indispensable and interested parties under Chapter 37 of the Texas Civil Practice and Remedies Code and Rule 39 of the Texas Rules of Civil Procedure.

PRAYER

Therefore, the Plaintiff prays that upon hearing and final trial, she be awarded damages, declaratory judgment, and/or the injunctive relief as requested herein, plus recovery of attorneys’ fees, plus pre-judgment interest at the highest rate allowed by

law, plus post-judgment interest at the highest rate allowed by law, and all such other and further relief to which she may be justly entitled.

Respectfully submitted,

By: /s/ Jack Stick
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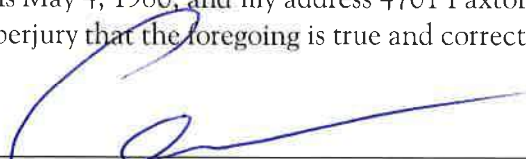
Counsel for Plaintiff Carrie de Moor, M.D.

UNSWORN DECLARATION

My name is Carrie de Moor, M.D. I have read the foregoing Plaintiff's Original Verified Petition for Declaratory Judgment and Request for Restraining Order and Temporary Injunction, and the factual allegations stated therein are within my personal knowledge and are true and correct to the best of my knowledge, unless otherwise previously qualified.

JURAT

My name is Carrie de Moor. My date of birth is May 4, 1980, and my address 4701 Paxton Lane, Frisco, Texas 75034. I declare under penalty of perjury that the foregoing is true and correct.



Carrie de Moor, M.D.



APPLICATION FOR A PLACE ON THE GENERAL PRIMARY BALLOT

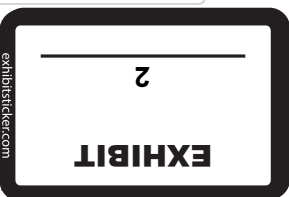
ALL INFORMATION IS REQUIRED TO BE PROVIDED UNLESS INDICATED AS OPTIONAL¹ Failure to provide required information may result in rejection of application.

APPLICATION FOR A PLACE ON THE <u>REPUBLICAN</u> PARTY GENERAL PRIMARY BALLOT					
To: State/County Chair			(Democratic or Republican)		
I request that my name be placed on the above-named official primary ballot as a candidate for nomination to the office indicated below.					
OFFICE SOUGHT (Include any place number or other distinguishing number, if any.) Texas Senate District 30		INDICATE TERM <input checked="" type="checkbox"/> FULL <input type="checkbox"/> UNEXPIRED		INCUMBENT DECLARATION: (Check this box if you are the incumbent.) INCUMBENT <input type="checkbox"/>	
FULL NAME (First, Middle, Last) Brent Allison Hagenbuch			PRINT NAME AS YOU WANT IT TO APPEAR ON THE BALLOT* Brent Hagenbuch		
PERMANENT RESIDENCE ADDRESS (Do not include a P.O. Box or Rural Route. If you do not have a residence address, describe location of residence.) 2800 Shoreline Drive			PUBLIC MAILING ADDRESS (Optional) (Address for which you receive campaign related correspondence, if available.)		
CITY Denton	STATE TX	ZIP 76210	CITY	STATE	ZIP
PUBLIC EMAIL ADDRESS (Optional) (Address for which you receive campaign related emails, if available.) brent.hagenbuch@gmail.com		OCCUPATION (Do not leave blank) CEO	DATE OF BIRTH [REDACTED]	VOTER REGISTRATION VUID NUMBER² (Optional)	
TELEPHONE CONTACT INFORMATION (Optional) Home: _____ Office: 940-600-4831 Cell: _____					
FELONY CONVICTION STATUS (You MUST check one) <input checked="" type="checkbox"/> I have not been finally convicted of a felony. <input type="checkbox"/> I have been finally convicted of a felony, but I have been pardoned or otherwise released from the resulting disabilities of that felony conviction and I have provided proof of this fact with the submission of this application. ³		LENGTH OF CONTINUOUS RESIDENCE AS OF DATE THIS APPLICATION WAS SWORN IN THE STATE OF TEXAS 28 year(s) 11 month(s)		IN TERRITORY/DISTRICT/PRECINCT FROM WHICH THE OFFICE SOUGHT IS ELECTED 0 year(s) 1 1/2 month(s)	
*If using a nickname as part of your name to appear on the ballot, you are also signing and swearing to the following statements: I further swear that my nickname does not constitute a slogan or contain a title, nor does it indicate a political, economic, social, or religious view or affiliation. I have been commonly known by this nickname for at least three years prior to this election. Please review sections 52.031, 52.032 and 52.033 of the Texas Election Code regarding the rules for how names may be listed on the official ballot.					
Before me, the undersigned authority, on this day personally appeared (name of candidate) <u>Brent Hagenbuch</u> , who being by me here and now duly sworn, upon oath says: "I, (name of candidate) <u>Brent Hagenbuch</u> , of <u>Denton</u> County, Texas, being a candidate for the office of <u>Senate District 30</u> , swear that I will support and defend the Constitution and laws of the United States and of the State of Texas. I am a citizen of the United States eligible to hold such office under the constitution and laws of this state. I have not been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote. I am aware of the nepotism law, Chapter 573, Government Code. I am aware that I must disclose any prior felony conviction, and if so convicted, must provide proof that I have been pardoned or otherwise released from the resulting disabilities of any such final felony conviction. I am aware that knowingly providing false information on the application regarding my possible felony conviction status constitutes a Class B misdemeanor. I further swear that the foregoing statements included in my application are in all things true and correct."					
		X SIGNATURE OF CANDIDATE			
Sworn to and subscribed before me this the <u>11</u> day of <u>NOVEMBER</u> , <u>2023</u> , by <u>Brent Hagenbuch</u> (name of candidate)					
 Signature of Officer Authorized to Administer Oath ⁴ Notary		 Printed Name of Officer Authorized to Administer Oath Notarial or Official Seal			
TO BE COMPLETED BY CHAIR OR SECRETARY OF THE COUNTY EXECUTIVE COMMITTEE: THIS APPLICATION IS ACCOMPANIED BY THE REQUIRED FILING FEE PAID BY: <input type="checkbox"/> CASH <input checked="" type="checkbox"/> CHECK <input type="checkbox"/> MONEY ORDER <input type="checkbox"/> CASHIERS CHECK OR <input type="checkbox"/> PETITION IN LIEU OF A FILING FEE <input type="checkbox"/> Voter Registration Status Verified					
This document and \$ <u>1250</u> filing fee or a nominating petition of <u>0</u> pages received. (See Section 1.007)					
<u>11/17/2023</u> Date Filed		 Signature of Chair or Designee Receiving Filed Application			
<u>11/20/2023</u> or _____ Date Accepted Date Rejected		 Signature of Chair or Secretary Upon Determination of Application			

Denton CAD

Property Search Results > 44640 HAGENBUCH, BRENT & JEAN for Year 2024

2024 - Values not available



Property

Property ID:	44640	Legal Description:	SOUTHSIDE ACRES BLK B LOT 2(PT)
Geographic ID:	SN0015A-00000B-0000-0002-0002	Zoning:	Residential
Type:	Real	Agent Code:	
Property Use Code:		Property Use Description:	

Location

Address:	1504 HIGHLAND CIR LITTLE ELM, TX 75068-3767	Mapco:	
Neighborhood:	SOUTHSIDE ACRES, PH1, PH2 NON-WATERFRONT	Map ID:	LE01
Neighborhood CD:	DC13026		

Owner

Name:	HAGENBUCH, BRENT & JEAN	Owner ID:	962351
Mailing Address:	1504 HIGHLAND CIR LITTLE ELM, TX 75068-3787	% Ownership:	100.000000000000%
		Exemptions:	HS

Values

(+) Improvement Homestead Value:	+	N/A
(+) Improvement Non-Homestead Value:	+	N/A
(+) Land Homestead Value:	+	N/A
(+) Land Non-Homestead Value:	+	N/A
(+) Agricultural Market Valuation:	+	N/A
(+) Timber Market Valuation:	+	N/A
(=) Market Value:	=	N/A
(-) Ag or Timber Use Value Reduction:	-	N/A
(=) Appraised Value:	=	N/A
(-) HS Cap:	-	N/A
(=) Assessed Value:	=	N/A

Taxing Jurisdiction

Owner: HAGENBUCH, BRENT & JEAN
 % Ownership: 100.000000000000%
 Total Value: N/A

Entity	Description	Tax Rate	Appraised Value	Taxable Value	Estimated Tax
C13	LITTLE ELM TOWN OF	N/A	N/A	N/A	N/A
CAD	DENTON CENTRAL APPRAISAL DISTRICT	N/A	N/A	N/A	N/A
G01	DENTON COUNTY	N/A	N/A	N/A	N/A
S10	LITTLE ELM ISD	N/A	N/A	N/A	N/A
Total Tax Rate:		N/A			

Taxes w/Current Exemptions:	N/A
Taxes w/o Exemptions:	N/A

Improvement / Building

Improvement #1: Residential **State Code:** A3 **Living Area:** 3133.0 sqft **Value:** N/A

Type	Description	Class CD	Exterior Wall	Year Built	SQFT
MA	MAIN AREA	10	Brick Veneer	1999	1872.0
AG	ATTACHED GARAGE	10		1999	590.0
MA2	SECOND FLOOR	10		1999	1261.0
DL50	DETACHED LIVING QUARTER'S	10		1999	607.0
AG	ATTACHED GARAGE	10		1999	294.0
OP	OPEN PORCH	10		1999	315.0

Land

#	Type	Description	Acres	Sqft	Eff Front	Eff Depth	Market Value	Prod. Value
1	9	WATERFRONT LOT	1.3077	56964.00	56964.00	1.00	N/A	N/A

Roll Value History

Year	Improvements	Land Market	Ag Valuation	Appraised	HS Cap	Assessed
2024	N/A	N/A	N/A	N/A	N/A	N/A
2023	\$325,264	\$674,736	0	1,000,000	\$0	\$1,000,000
2022	\$314,504	\$253,027	0	567,531	\$0	\$567,531
2021	\$426,066	\$202,421	0	628,487	\$0	\$628,487
2020	\$431,945	\$202,421	0	634,366	\$0	\$634,366
2019	\$433,637	\$202,421	0	636,058	\$0	\$636,058
2018	\$385,871	\$202,421	0	588,292	\$0	\$588,292
2017	\$339,179	\$202,421	0	541,600	\$21,901	\$519,699
2016	\$270,033	\$202,421	0	472,454	\$0	\$472,454
2015	\$246,615	\$202,421	0	449,036	\$0	\$449,036
2014	\$250,944	\$242,404	0	493,348	\$0	\$493,348
2013	\$256,737	\$242,404	0	499,141	\$0	\$499,141
2012	\$259,497	\$242,404	0	501,901	\$0	\$501,901
2011	\$262,118	\$242,403	0	504,521	\$30,212	\$474,309
2010	\$264,907	\$285,181	0	550,088	\$118,898	\$431,190

Deed History - (Last 3 Deed Transactions)

#	Deed Date	Type	Description	Grantor	Grantee	Volume	Page	Deed Number
1	5/30/2017	GNV	GENERAL WD WITH VENDOR'S LIEN	MARCHAND, ALAN P	HAGENBUCH, BRENT & JEAN			2017-65292
2	12/20/1996	GN	GENERAL WD	BOLENEUS, PETE	MARCHAND, ALAN P			96-0089474
3	8/22/1995	WD	WARRANTY DEED	WILLIAMS, OWEN D	BOLENEUS, PETE			95-0051149

Questions Please Call (940) 349-3800

This year is not certified and ALL values will be represented with "N/A".



- ELECTION DAY
- ISSUE TRACKING
- REPORTING
- BALLOTS 518
- MESSAGES
- POLL PADS
- VOTERS
 - REGISTERED VOTERS
 - PROCESSED VOTERS
 - ADDED VOTERS
 - ADDRESS CHANGES
 - NAME CHANGES
 - UPDATE PARTIES
 - UPDATE STATUSES
 - UPDATE STATUS IMPORTS
 - POLLING PLACES
 - POLL WORKERS
 - ELECTION SETUP
 - ACCOUNT SETTINGS
 - LOGOUT

ACTIONS

BRENT ALLISON HAGENBUCH

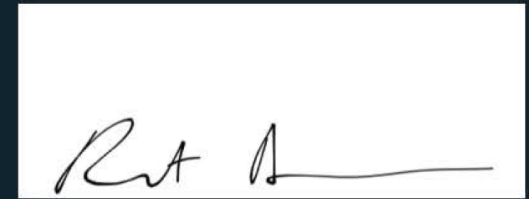
DOB: [REDACTED]
 AGE: 63
 POLLING PLACE: LITTLE ELM TOWN HALL
 REGISTERED ADDRESS: 1504 HIGHLAND CIR LITTLE ELM, TX 75068



exhibitcenter.com

Voted

at 12:11 pm on Sunday, October 29 2023



ID METHOD: Driver's License
 OATH VOTER CHECK IN SIGNING PAGE: 3406
[View Signatures](#)

- DETAILS
- CHECK IN HISTORY
- NAME CHANGES
- ADDRESS CHANGES
- LOGS

STATUS:	Active	FEDERAL ONLY:	
ABSENTEE STATUS:	No	VOTER LINE NUMBER:	205461
PARTY:		STATE ID:	1074846465
BALLOT STYLE:	<u>2075-00</u>	VOTER LICENSE #:	[REDACTED]
VOTER STATUS REASON:		REGISTRANT ID:	1074846465
POLLING PLACE:	LITTLE ELM TOWN HALL	VOTER OVER 18:	True
PRECINCT CODE:	<u>207501</u>	ID REQUIRED:	
PRECINCT NAME:	<u>207501</u>		
PRECINCT SPLIT:			

Precincts by District

SENATE DISTRICT 12 - PLANS2168

District	County	Precinct
12	Dallas *	2001
		2002
		2003
		2004
		2005
		2006
		2007
		2008
		2011
		2015
		2016
		2018
		2019
		2025
		2026
		2027
		2028
		2030
		2041
		2048
		2049
		2050
		2051
		2052
		2053
		2054
		2055
		2056
		2057
		2058
		2074
		2076
		2077
		2079
		2080
		2090
		2091
		2096
		20A8
		2108
		2119
		2133
		2200
		2201
		2202
		2203
		2220
		2221
		2222
		2223
		2224
		2225
		2226
		2300
		2301
		2302
		2303
		2305
		2306
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		2309
		2310
		2311
		2312
		2313
		2315
		2316
		2400
		2401
		2402
		2403
		2404
		2405
		2406
		2407
		2408
		2409
		2410



* County is in more than one district.
** Precinct is split by district boundary.

Precincts by District

SENATE DISTRICT 12 - PLANS2168

District	County	Precinct
12	Dallas *	2411
		2412
		2417
		2601
		2602
		2603
		2604
		2605
		2607
		2608
		2609
		2610
		2611
		2612
		2613
		2614
		2800
		2801
		2802
		2803
		2804
		2805
		2806
		2807
		2808
		2809
		2810
		2900
		2901
		2902
		2903
		2904
		2905
		2910
		2911
		2913
		29A1
		4005
		4014
		4094
		4096
		4126
		4127
		4128
		4129
12	Denton *	1000
		1001
		1002
		1044
		1045
		1046
		1053
		2074
		2075
		2095
		2096
		2097
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		2105
		2106
		2107
		2108
		2109
		2110
		2111
		2112
		2113
		2114
		3115
		3116
		3123
		3124
		3125

* County is in more than one district.
** Precinct is split by district boundary.

Precincts by District

SENATE DISTRICT 12 - PLANS2168

District	County	Precinct
12	Denton *	3126
		3127
		3128
		3129
		3130
		3131
		3132
		3133
		3134
		3135
		3136
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		4213
		4214
		4215
		4216
		4217
		4218
		4219
		4220
		4221
		4222
		4223
		4224
		9100
		9101
		9200

* County is in more than one district.
** Precinct is split by district boundary.

Precincts by District

SENATE DISTRICT 12 - PLANS2168

District	County	Precinct
12	Denton *	9201
		9202
		9204
		9301
		9302
		9303
		9304
12	Tarrant *	3035
		3037
		3038
		3114
		3193
		3260
		3283
		3321
		3322
		3323
		3330
		3331
		3361
		3368
		3384
		3385
		3390
		3396
		3421
		3443
		3469
		3510
		3516
		3530
		3539
		3542
		3562
		3566
		3574
		3663
		3706
		3735
12	Wise	0001
		0002
		0003
		0004
		0005
		0006
		0007
		0008
		0009
		0010
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		0012
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		0027
		0028
		0029
		0030

* County is in more than one district.
** Precinct is split by district boundary.



Certificate 1198064

Voter Id 1074846465

HAGENBUCH BRENT A

2801 SHORELINE DR, DENTON 76210

Texas Voter Registration Application For Official Use Only

Prescribed by the Office of the Secretary of State VRS17.001(8.0) **NOV 13 2023**

Please complete sections by printing LEGIBLY. If you have any questions about how to fill out this application, please call your local voter registrar.

1 These Questions Must Be Completed Before Proceeding (Check one)

New Application Change of Address, Name, or Other Information Request for a Replacement Card

Are you a United States Citizen? Yes No

Will you be 18 years of age on or before election day? Yes No

Are you interested in serving as an election worker? Yes No

2 Last Name (include Suffix if any) **First Name** **Middle Name (if any)** **Former Name (if any)**

HAGENBUCH BRENT A.

3 Residence Address: Street Address and Apartment Number, if none, describe where you live. (Do not include P.O. Box, Rural Rt. or Business Address) **City** **State**

2800 SHORELINE DR DENTON TEXAS
DENTON TX 76210 DENTON 76210

4 Mailing Address: Street Address and Apartment Number (if mail cannot be delivered to your residence address.) **City** **State** **Zip Code**

2801 SHORELINE DR DENTON TX 76210 DENTON TEXAS 76210

5 City and County of Former Residence in Texas
LITTLE ELM DENTON COUNTY

6 Date of Birth: **7** Gender (Optional) Male Female **8** Telephone Number (Optional) (Include Area Code)

9 Texas Driver's License No. or Texas Personal I.D. (Do not include the Department of Public Safety) **11** If no Texas Driver's License or Personal Identification, give last 4 digits of your Social Security Number

XXX-XX-XXXX

I have not been issued a Texas Driver's License/Personal Identification Number or Social Security Number.

10 I understand that giving false information to procure a voter registration is perjury, and a crime under state and federal law. Conviction of this crime may result in imprisonment up to one year in jail, a fine up to \$4,000, or both. Please read all **Disc** statements to affirm before signing.

- I am a resident of this county and a U.S. citizen;
- I have not been finally convicted of a felony, or if a felon, I have completed all of my punishment including any term of incarceration, parole, supervision, period of probation, or I have been pardoned; and
- I have not been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.

X *[Signature]* Date **11 13 23**

Signature of Applicant or Agent and Relationship to Applicant or Printed Name of Applicant if Signed by Witness and Date.

Date Image Scanned 11/21/2023

Scan Date = 11/21/2023



content



Voter Lookup

Registered Voters as of **12/14/23**
Total 626,772

ELECTION RESULTS

To view your sample ballot, please fill out the form below and click the search button.

Voter Information

****If your registration information has changed within the last 30 days, the information below may be inaccurate. Please contact our office to verify your registration information at 940-349-3200****

Eligible to vote	YES
BRENT ALLISON HAGENBUCH	
Date Of Birth	1960
Street Address	2801 SHORELINE DR
City	DENTON
Status	Active
VUID Number	1074846465
Registration Date	11/16/2017
Precinct	4164



MY ELECTED OFFICIALS

No Elections Found

What does the term 'Suspense' mean on a voter's record of status?

Pursuant to Sec.15.111, 63.0011 of the Election Code, the term 'suspense' is used to designate those voters that the Denton County Voter Registrar does not have a current address. A voter with this designation will be removed from the suspense list once that person has advised us of his or her new address. This new address is important, not only so that our records will be accurate, but also so that the voter is voting in the elections where he or she resides.

Voting at the Polls: A Suspense voter is eligible to vote if the voter's residence address is not current because the voter has changed residence within the county, if otherwise eligible, in the election precinct in which the voter is registered if the voter still resides in the territory covered by the election. The election judge will require you to fill out and submit a statement of residence form.

Changing Address before Voting:

If your status is Suspense and you have moved outside the county or political subdivision that is ordering this election you will need to mail (post marked) or deliver in person a new Voter Application to the elections department by 30 days before Election Day, in order to vote with your current residence address. You may fax your voter registration application into the elections department, but a copy of the application must be submitted by mail and received no later than the fourth business day after the fax has been received. Click here for an **on-line Application**. On the application, select Application Type: Change, fill out with current address and information, select submit, print application and sign application. Return it to Denton County Voter Registration Department by either: A. Fax to (940) 349-3201 OR B. Mail or Deliver to Denton County Elections Department - Voter Registration 701 Kimberly Drive, Suite A101 Denton, TX 76208

This website is for informational purposes only. While we endeavor to provide timely and accurate information, we make no guarantees. This material has been compiled from various sources. For additional questions please contact the Denton County Elections Department at (940) 349-3200.



Contact Us

Denton County Elections Administration

701 Kimberly Drive, Suite A101

Denton, TX 76208

tele (940) 349-3200

fax (940) 349-3201

e-mail elections@dentoncounty.gov



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2310-0371

City of Denton

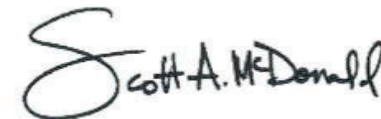
Certificate of Occupancy

Name of Business: TITUS TRANSPORT HOLDINGS LLC
Address: 2800 SHORELINE DR 310
Use: OFFICE
Owner of Business: BRENT HAGENBUCH
Owner of Premise: MAC LEGACY INVESTMENTS, INC

Zoning:	MR	Type of Construction:	II-B	Occupancy:	B
Square Feet:	44181	Number of Stories:	1	Required Parking:	17
Sprinkler System:	Yes	Occupancy Load:	53	Model Code:	Unknown

Stipulations:

Date Approved: 10/23/2023



Scott McDonald, Building Official

This building or portion thereof has been inspected for compliance with the requirements of this code for the occupancy and division of occupancy and the use for which the proposed occupancy is classified.

This Certificate of Occupancy shall be posted in a conspicuous place on the premise and shall not be removed except by the Building Official.



HAGENBUCH, BRENT A

2801 SHILOH

76210

1198064

Voter ID 1074846465

1074846465

RELINE DR DENTON

Texas Voter Registration Application
VR17 1163

Please send this application to:
REGISTRAR OF VOTERS
P.O. BOX 1720
DENTON, TX 76202

Application Type: Change

Are you a United States Citizen? Yes
 Are you interested in serving as an election worker? Yes

2 Last Name: Hagenbuch
 Residence: Little Elm
 City: Little Elm
 Middle Name: Allison
 Former Name: Hagenbuch

Address: 1504 Highland Circle
 City: DENTON
 State: TX
 Zip Code: 75068

4 Home Address: 1504 Highland Circle
 City: Little Elm
 State: TX
 Zip Code: 75068

5 Date of Birth: 03/22/1980
 Gender: Male
 Telephone Number: OCT 17 2017

8 TX Driver's License No. or Texas Personal I.D. No.: 17305785
 If no TX Driver's License or Personal I.D. No., provide last four digits of your Social Security Number: OCT 17 2017

I have not been issued a Driver's License or Social Security Number.

9 I understand that giving false information is a crime under state and federal law. Conviction of this crime is a felony, and a crime under state and federal law, a fine up to \$2,000, or both. Please read all instructions carefully.

000130441

I am a resident of this county and U.S. Citizen;
 I have not been finally convicted of a felony, or if a felon, I have completed all of my punishment including any term of incarceration, parole, supervision, period of probation, or I have been pardoned; and
 I have not been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or legally mentally incapacitated without the right to vote.

[Signature]
 Signature of Applicant or Agent and Relationship to Applicant or Printed Name of Applicant if Signed by Witness and Date: 10, 17, 2017

10/17/2017
Date Imaged: 10/17/2017

Scan Date = 10/17/2017

VR Systems 22.0.63101

VR Systems Voter Pool
12/11/2023 2:00:29 PM
Operator = mdejesus

Results Permit #2310-0382

PRINT

Permit Info

Site Info

Contacts **

Inspections(3)

Contact Type	Name	Address	City/State/Zip
APPLICANT	DEREK LINDSEY	2800 SHORELINE DR	DENTON, TX 76210
BUS. NAME	GIDDY UP LLC	2800 SHORELINE DR S...	DENTON, TX 76210
BUS. OWNER	BRENT HAGENBUCH	1504 HIGHLAND CIRCLE	LITTLE ELM, TX 75068
CONTACT	DEREK LINDSEY	2800 SHORELINE DR	DENTON, TX 76210
TENANT	GIDDY UP LLC	2800 SHORELINE DR S...	DENTON, TX 76210
PROP. OWNER	MAC LEGACY INVEST...	2650 FM 407 SUITE 145...	BARTONVILLE, TX 76226
OWNER	MAC LEGACY INVEST...	2800 SHORELINE DR	DENTON, TX 76210.0000

Texas Driver Detail

Collapse All Show Empty Fields

Record Details			
License number	0017305785	First Name	BRENT
Middle Name	ALLISON	Last Name	HAGENBUCH
Date of Birth	Mar 22 1960	License type	DL
Address	2800 SHORELINE DR.	City	DENTON
State	TX	ZIP Code	76210
Issue Date	Nov 22 2023		
Above information as provided by state - Our annotations are below			
Address (click to find others)	2800 Shoreline Dr	City/State/ZIP Code (click to find others)	Denton, TX 76210-0128

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Edye Buxbaum on behalf of Jack Stick

Bar No. 795156

ebuxbaum@verislaw.net

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Filing Code Description: First Amended

Filing Description: (Plaintiffs) Verified Petition for Declaratory Judgment and Request for Temporary Restraining Order and Temporary Injunction

Status as of 12/18/2023 10:03 AM CST

Associated Case Party: Carrie De Moor, M.D.

Name	BarNumber	Email	TimestampSubmitted	Status
Jack Stick		jstick@verislaw.net	12/17/2023 10:31:38 PM	SENT
Michael Alfred		malfred@verislaw.net	12/17/2023 10:31:38 PM	SENT
Edye Buxbaum		ebuxbaum@verislaw.net	12/17/2023 10:31:38 PM	SENT
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