

NO. 25-DCV-328122

IN THE MATTER OF  
THE MARRIAGE OF

GLORIA ESPINA  
AND  
REINALDO J. AGUIAR MARCANO

AND IN THE INTEREST OF  
MARCELO A. AGUIAR, A CHILD

§                   **IN THE DISTRICT COURT**  
§ Fort Bend County - 387 Judicial District Court  
§                   **JUDICIAL DISTRICT**  
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§                   **FORT BEND COUNTY, TEXAS**

**ANSWER TO ORIGINAL PETITION FOR DIVORCE**

1.     *Discovery*

**PRESERVATION OF EVIDENCE: PETITIONER IS PUT ON NOTICE TO PRESERVE AND NOT DESTROY, TRANSFER, CONCEAL, OR ALTER ANY EVIDENCE OR POTENTIAL EVIDENCE RELEVANT TO THE ISSUES IN THIS CASE, INCLUDING CRYPTO CURRENCY ASSETS WHETHER THEY WERE PREVIOUSLY REPORTED TO THE INTERNAL REVENUE SERVICE OR NOT, CRYPTO CURRENCY WALLETS INCLUDING SOFTWARE AND HARDWARE CRYPTO WALLETS, FOREIGN BANK ACCOUNTS, MILITARY ENROLLMENT RECORDS FROM FOREIGN MILITARY FORCES, MILITARY SERVICE RECORDS FROM FOREIGN MILITARY FORCES.**

**REQUEST OF DISCLOSURE OF ARRESTS AND FEDERAL CHARGES: PETITIONER IS ASKED TO DISCLOSE: i) WHETHER PETITIONER IS CURRENTLY UNDER ARREST BY FEDERAL AUTHORITIES, ii) THE FULL LIST OF FEDERAL CHARGES, IF APPLICABLE.**

2. Request to Assignment of Case to Associate Judge

Respondent objects to the Petitioner's "Objection to Assignment of Case to Associate Judge" on paragraph 2 of the ORIGINAL PETITION FOR DIVORCE.

Respondent requests that the matter be assigned to Associate Judge.

3. Parties

The original suit was brought by Gloria Espina, Petitioner. The last three numbers of Gloria Espina's driver's license number are 742. The last three numbers of Gloria Espina's Social Security number are 311.

Reinaldo J. Aguiar Marcano is Respondent on the original suit. The last three numbers of Reinaldo J. Aguiar Marcano's driver's license are 539. The last three numbers of Reinaldo J. Aguiar Marcano's social security number are 502. **The Respondent was served with the Original Demand For Divorce on April 16, 2025**

4. Domicile

Petitioner and child's Domicile is unknown.

Petitioner has refused in multiple occasions to disclose to the Respondent the residence or location of the child.

Respondent's domicile is 2302 Briton Ridge, Katy, Texas 77494.

5. Request to dismiss *"Marriage" Claims, all "Marriage" and "Divorce" related claims*

Respondent respectfully submits to the court that Petitioner and Respondent are not, and have never been legally married.

5.1 Respondent submits to the court that the term "Divorce", should not apply to common-law relationships, as "divorce" specifically refers to the legal dissolution of a formal marriage. A formal marriage is one that is both licensed and legally recognized by the state or jurisdiction. Respondent respectfully submits to the court that accurate legal terminology is important in these proceedings.

6. *Dates of Common-law Relationship*

The parties are not legally married and have never been legally married. The parties were on a common-law relationship from on or about January 1st, 2015 until March 28, 2025.

7. *Division of Common-law Partnership Property*

Respondent submits to the Court that during the duration of the common-law relationship, each party kept separate bank accounts, separate payroll/income accounts, separate properties, separate credit cards.

7.1 Respondent submits to the Court that only one bank account was held on joint names: Chase Account ending in 08, which was used to pay revolving expenses like groceries and other similar expenses. All the funds coming into that account, were exclusively provided by the Respondent.

7.2 Respondent requests to Court to only divide the assets legally registered as property on both names jointly, in a manner that the Court deems just and right, as provided by law.

8. *Separate property*

Respondent owns certain separate property that is not part of any community or joint estate with any other party, and Respondent requests the Court to confirm that separate property as Respondent's separate property and estate.

8.1 Upon information and belief, Petitioner Gloria Espina owns a large amount of crypto currency assets, possibly exceeding the net value of the separate property and assets of the Respondent.

8.2 Respondent requests the Court to assess whether it would be equitable and just that the party that holds the larger combined positions (including Respondent's crypto currency, crypto assets, and foreign bank accounts), pays alimony, child support, and the legal expenses of the party with less combined net assets.

**9.      *Notice of Violations of Standing Mutual Injunctions***

***Regarding Temporary Injunctions for the 328<sup>th</sup>, 387<sup>th</sup> and 505<sup>th</sup> District Courts which applies in every divorce and suit affecting the parent-child relationship filed in Fort Bend County, Texas.***

Respondent hereby provides notice to Petitioner and her legal counsel, Morgan Hybner State Bar No. 24073583, that Petitioner and her legal team are currently in violation, and have been in violation for 28 consecutive days, of the **Standing Mutual Injunctions for the 328<sup>th</sup>, 387<sup>th</sup> and 505<sup>th</sup> District Courts** , attached to the **Original Petition of Divorce as Exhibit A**, which should have been correctly marked as "Petitioner Ex.

1", and applies in every suit affecting the parent-child relationship filed in Fort Bend County, Texas. Specifically in the ordinances detailed in the following paragraphs:

1. **Section III, paragraph 2:** Disrupting or withdrawing a child from the school or day-care facility where the child is enrolled. Upon information and belief, the child is not attending his regular daycare facility. the Petitioner called the daycare facility on or around 04/02 and notified the staff that the child would not be attending for an "unspecified amount of time, but possibly for over a month".

2. **Section III, paragraph 2:** Hiding or secreting a child from the other parent. Respondent respectfully submits to the Court that Petitioner has refused/ignored all requests from Respondent to be allowed to do an in-person 5-minute welfare check on the child, thus "Hiding or secreting a child from the other parent".

10. Respondent respectfully submits to the Court that the actions and/or omissions detailed on paragraph 9 of this document, constitute serious violations to the "STANDING TEMPORARY MUTUAL INJUNCTIONS DIVORCE WITH CHILDREN" attached to

Original Demand For Divorce **as Exhibit A**, which should have been correctly marked as Petitioner Ex. 1.

11. *Request to Dismiss/Deny item "14.b in Petitioner's request For Temporary Orders Regarding Child": request for order for psychiatric evaluation of Respondent.*

Respondent respectfully submits to the Court, that all citizens must be treated equally and must be deemed fit and capable by the judiciary system regardless of race, occupation or beliefs, unless there are *strong* reasons for the Court to believe otherwise.

11.1 Respondent respectfully submits to the Court that during the duration of the common-law relationship with the Petitioner, spanning 11 years, there were absolutely zero (0) incidents, altercations, disputes or domestic violence complaints of any kind. On the contrary, Respondent always cordially and politely attended to every need of the Petitioner and their two children, over the entire eleven years of the common-law relationship.

11.2 Respondent respectfully submits to the Court that Respondent has maintained long term employment at high positions at very reputable companies like Google Inc.,

Goldman Sachs, Twitter, Yahoo Inc., for a period of time spanning over 20 years. Respondent respectfully submits to the court that this would have not been possible if the interviewers, employers, managers, coworkers, colleagues and trained Human Resources personnel of said employers of Respondent had any doubts about the Respondent's mental fit and abilities.

11.3 Respondent respectfully submits to the court that there are no grounds or reasons for this unreasonable demand or request of the Petitioner.

11.4 Respondent respectfully submits to the Court that, upon information and belief, this specific request might be a legal tactic to damage the Respondent's reputation and credibility on a separate set of proceedings involving other parties in Federal Court in which Respondent might be called as a key witness.

12. *Request for signing officers to use legible names below their all their signatures*

Respondent respectfully submits to the court that the judge that signed the "TEMPORARY RESTRAINING ORDER AND ORDER SETTING HEARING FOR TEMPORARY ORDERS" on Cause No. 25-DCV-328122, which

was dated and signed on April 11, 2025 at 8:15AM, was signed by the judge using an illegible signature and did not include the judge legible name, specific court, position, or any kind of identifier for the judge on the order.

12.1 Respondent respectfully requests all parties involved in the proceedings that given that the life and welfare of a child is at stake, all parties participating in the proceedings, including judges and clerks, please sign their names and court positions in legible form in all relevant documents to the proceedings.

**13. Notice of Aiding and Abetting a Racketeer Influenced and Corrupt Organization (RICO)**

Petitioner and her legal team, including Morgan Hybner State Bar No. 24073583, are put on Notice that Respondent is currently a Whistle-blower furnishing information to the Department of Homeland Security, the Federal Bureau of Investigation (FBI) the Drug Enforcement Administration (DEA), the Internal Revenue Service (IRS) and the Department of Justice (DOJ), regarding a vast criminal enterprise comprised of several individuals, including foreign military leaders like Diosdado Cabello, a

Venezuelan Military figure wanted by the DOJ and DEA, Vladimir Padrino Lopez, a Venezuelan Military officer wanted by the DOJ and DEA, important players in legal circles like Ele Klein, an attorney residing in New York, and high profile officials in Texas' Politics like Governor Greg Abbott and Attorney General Ken Paxton.

13.1 The removal of the child from his home on 03/28/2025 occurred less than 48 hours after Respondent filed with the IRS and subsequently made public an IRS form 211 reporting alleged tax fraud and naming specifically Diosdado Cabello, eBay, Akamai and Neustar in said form.

13.2 Petitioner and her legal team, are also put on notice that there have been multiple attempts against Respondent's life allegedly coming from the same criminal organization Respondent is reporting to federal authorities. Respondent has reported to federal authorities all the alleged attempts, and all have been documented and the documentation has been sent to Federal agencies.

13.3 Petitioner and her legal team are put on notice that aiding and abetting a criminal enterprise during the commission of their crimes, even if using Petitioner's own

parental rights, given the scope of their criminal activities and the attempts against Respondent's life, could carry significant penalties under Texas and Federal law, even if the attempts against Respondent's life are not successful.

13.4 Respondent respectfully asks all parties participating in these proceedings to please carbon-copy all communications addressed to the Respondent to the Federal Bureau of Investigation using the following address:

**FBI - Organized Crime Unit - PayPal Mafia Taskforce  
935 Pennsylvania Ave., NW, Washington, DC 20535-0001**

13.5 For your records, you can download a copy of the IRS Form 211 Respondent submitted to the IRS and made public less than 48 hours prior to the removal of the child from his home:

<https://spyhell.org/mafia>

Alternative Link:

[https://storage.googleapis.com/paypal-mafia/notable-posts/000\\_Legal-Communications/Forms-211/SENT/FBI\\_HASH\\_XI-JINPING-VLADIMIR-PUTIN-DIOSDADO-CABELLO-MASOUD-PEZESHKIAN-RAUL-CASTRO-FRANK-WALTER-STEINMEIER.pdf](https://storage.googleapis.com/paypal-mafia/notable-posts/000_Legal-Communications/Forms-211/SENT/FBI_HASH_XI-JINPING-VLADIMIR-PUTIN-DIOSDADO-CABELLO-MASOUD-PEZESHKIAN-RAUL-CASTRO-FRANK-WALTER-STEINMEIER.pdf)

Audio Summary:

<https://storage.googleapis.com/paypal-mafia/podcast.mp4>

14. *Prayer*

Respondent prays the Court to prioritize the issue of locating the missing child and urgently order the Petitioner to comply with the STANDING TEMPORARY MUTUAL INJUNCTIONS DIVORCE WITH CHILDREN, specially in the following aspects:

1. Returning the child to regular attendance to the same day-care facility where the child was enrolled until the day the child was removed from his home (March 28<sup>th</sup> 2025):

**The British Private Prep School - (281) 394-7737**

**25935 Cinco Terrace Dr, Katy, TX 77494**

2. Arranging for an in-person welfare check on the child to be conducted by the Respondent, Reinaldo J. Aguiar Marcano, as soon as possible.

Respondent prays that in the event that Petitioner and her counsel fail to comply the STANDING TEMPORARY MUTUAL INJUNCTIONS DIVORCE WITH CHILDREN, the court engages law enforcement to locate the missing child and return him to his home located at 2302 Britton Ridge Drive, Katy TX 77494.

Respondent prays that the Court dismisses all claims and demands for “divorce” and divorce related claims, as Petitioner and Respondent are not, and have never been legally married.

Respondent prays that the Court compels Petitioner to disclose important elements related to their ORIGINAL PETITION, specially:

1. A complete inventory and location of all of Petitioner Gloria Espina’s crypto assets / crypto currencies holdings, crypto wallets, and Foreign bank accounts holdings, including those not previously reported to the Internal Revenue Service.
2. Whether Petitioner is currently enrolled in any Venezuelan Military forces, and a true copy of her discharge documentation if not currently enrolled.
3. Whether Petitioner is currently detained by Federal Authorities, on what charges, and if the charges are in connection with any Venezuelan Military forces acting as Unregistered Agents within the United States in violation of the Foreign Agents Registration Act (the “FARA”).

Respondent prays that the Court independently verifies with the Federal Bureau of Investigations (the FBI) whether the Petitioner, Gloria Espina, is currently detained by the FBI, and if applicable under what charges. Respondent respectfully prays to the Court that, given the gravity of the implications of this aspect on the welfare of the child, the court does not rely solely on statements made by the Petitioner or her legal team on this regard.

Respondent prays that the Court compels Petitioner to appear in person to all court and mediation proceedings without using a proxy or delegated representative. Respondent respectfully submits to the Court that this requirement could help eliminate and/or resolve doubts of whether Respondent has been detained by Federal authorities.

Respondent prays that in the event that Petitioner has been detained or charged by Federal Authorities for the commission of one or more crimes, the sole custody of the child is granted to Respondent, Reinaldo J. Aguiar Marcano, at least temporarily while Petitioner resolves her legal situation with federal authorities.

Respondent prays for general relief and protection of the of the child and the Respondent.

Respondent prays to the Court, given that the Original Petition for Divorce might be related, even if indirectly, to a major National Security Threat, that the Court decides on the side of caution and forwards all files related to these proceedings, on their entirety, to the Federal Bureau of Investigation (the FBI), The Drug Enforcement Administration (the DEA), the Internal Revenue Service (the IRS) and the Department of Justice Headquarters in Washington D.C. (the DOJ), regardless if the forms, documents or applications may contain errors in form or format or other technicalities.

SIGNED on April 28, 2025 at 12:20 pm

By: Reinaldo Aguiar

Reinaldo J. Aguiar Marcano,

Pro-se

2302 Britton Ridge Drive, Katy, TX 77494

### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

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Filing Description: Answer to Original Petition for Divorce

Status as of 4/29/2025 9:24 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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Tina Simon		tsimon@adamslawfirm.com	4/28/2025 6:53:08 PM	SENT