

Formal Criminal Complaint & Affidavit

FORMAL CRIMINAL COMPLAINT & EVIDENCE PACKET

Lauriston Crockett III

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DATE: [Insert Date]

TO:

- Federal Bureau of Investigation - Dallas Field Office
- Dallas County District Attorney - Criminal Investigations Division
- Texas Attorney General - Civil Rights & Child Protection Divisions

RE: Formal Criminal Complaint - Diem "Nikki" Ngo Cottingham

Cause No. 13-06713-T | Dallas County Family Court

To Whom It May Concern,

This document constitutes a full criminal complaint and supporting evidence packet for the immediate

investigation and prosecution of Diem "Nikki" Ngo Cottingham. The crimes committed are severe, sustained,

and substantiated. They involve knowingly false reports of child abuse, conspiracy to deprive civil rights,

direct violation of lawful court orders, and child endangerment through psychological abuse.

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CRIMINAL STATUTES VIOLATED:

State of Texas Statutes:

- Texas Penal Code § 25.03 - Interference with Child Custody
- Texas Family Code § 157.001 - Contempt of Court
- Texas Penal Code § 37.03 - Aggravated Perjury
- Texas Penal Code § 37.08 - False Report to Peace Officer
- Texas Family Code § 261.107 - False Report of Child Abuse or Neglect
- Texas Family Code § 261.001(1)(B) - Psychological Abuse of a Minor

Federal Statutes:

- 18 U.S. Code § 241 - Conspiracy Against Rights
- 18 U.S. Code § 242 - Deprivation of Rights Under Color of Law
- Federal Rule of Civil Procedure 60(d)(3) - Fraud on the Court

NARRATIVE OF EVENTS:

Diem "Nikki" Ngo Cottingham filed multiple false allegations of child abuse against me -

Lauriston Crockett III

- knowing they were fabricated. Under sworn deposition, she admitted to fabricating these claims.

Nevertheless, she filed or directed the filing of false reports with the Plano Police Department, Highland Park

Police Department, CPS, and Medical City Plano.

All investigations resulted in no findings of abuse.

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Despite active and lawful court orders awarding me access and possession of my son, Nikki repeatedly

denied visitation, withheld communication, and acted with full intent to obstruct a lawful custody arrangement.

Her actions constitute a criminal violation of Texas law and a conspiracy to deprive my federally protected parental rights.

As a result of her coordinated fraud and legal abuse:

- I was emotionally and financially devastated
- I was forced into personal bankruptcy due to ongoing false litigation
- I was coerced into relinquishing my parental rights under financial duress, not as a result of unfitness or neglect, but as a direct consequence of this criminal conspiracy
- My minor child suffered parental alienation and psychological manipulation

RESULTING HARM:

- Unlawful deprivation of court-ordered parenting time
- Emotional distress to both myself and my minor child
- Ongoing parental alienation
- Financial loss culminating in bankruptcy
- Forced termination of parental rights under duress and systemic abuse
- Reputational destruction
- Interference with religious, parental, and constitutional rights

REQUEST FOR IMMEDIATE ACTION:

I am requesting the following:

- Filing of criminal charges under all applicable Texas Penal Code and Family Code provisions listed above

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- Federal criminal investigation under 18 U.S.C. §§ 241 & 242 for civil rights violations
- Sanctions for fraud on the court under Rule 60(d)(3)
- Full enforcement of contempt charges for disobeying standing court orders
- Protective oversight to prevent further harm to my child
- Judicial review to reverse the unlawful termination of my parental rights, which were relinquished under

financial and emotional duress caused by this conspiracy

EVIDENCE INDEX - EXHIBITS A-G:

Exhibit A - Sworn deposition transcript: Nikki admits to fabricating abuse claims

Exhibit B - CPS and Police reports: All cleared, no abuse found

Exhibit C - Official court orders: Granting lawful possession and access

Exhibit D - Texts/emails: Nikki refusing to comply with court-ordered access

Exhibit E - Evaluations from licensed professionals (e.g., Dr. Linda Threats) disproving allegations

Exhibit F - Chronological timeline of court violations and coordinated interference

Exhibit G - Financial records and bankruptcy filing due to malicious litigation

SWORN AFFIDAVIT OF FACTS

I, Lauriston Crockett III, hereby declare under penalty of perjury under the laws of the United States and the

State of Texas that the following is true and correct to the best of my knowledge:

1. I am the biological father of [child's initials], a minor child involved in Cause No. 13-06713-T in the Dallas

County Family Court.

2. Diem "Nikki" Ngo Cottingham, the child's mother, knowingly fabricated abuse allegations against me and

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admitted such fabrications during sworn deposition.

3. She filed or directed the filing of false reports to CPS, Plano Police Department, Highland Park Police Department, and Medical City Plano, all of which were cleared as unfounded.

4. She willfully refused to comply with multiple court orders granting me possession and access, thereby interfering with custody and committing contempt of court.

5. Her actions caused extreme emotional distress to both me and my son, resulted in parental alienation, reputational damage, and financial loss that culminated in personal bankruptcy.

6. As a direct consequence of this conspiracy and financial collapse, I was forced under duress to relinquish my parental rights - not due to any finding of unfitness - but because I could no longer sustain the legal abuse and financial burden imposed by the coordinated misconduct of the parties involved.

7. The attached exhibits (A-G) are accurate and truthful representations of the events described. I submit this affidavit as part of a formal request for criminal investigation and prosecution of Diem "Nikki" Ngo Cottingham under applicable state and federal law.

Executed this ____ day of _____, 2025.

Lauriston Crockett III

[NOTARY BLOCK TO BE COMPLETED UPON SIGNING]

DOCUMENT INSTRUCTIONS:

- Notarize this affidavit
- Print and organize cover letter, affidavit, and exhibits

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- Submit full package via certified mail or hand delivery to:
- FBI Dallas Field Office
- Dallas County DA - Criminal Division
- Texas AG - Civil Rights & Child Protection Divisions

Prepared and submitted by:

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