

**CAUSE NO. 26-000495-CV-472**

<b>JOHNNY MANZIEL,</b>	§	<b>IN THE DISTRICT COURT</b>
<i>Plaintiff,</i>	§	<b>472ND JUDICIAL DISTRICT</b>
<b>v.</b>	§	<b>BRAZOS COUNTY, TEXAS</b>
<b>MAKENZIE CARTER aka</b>	§	
<b>MAKENZIE CALAME,</b>	§	
<i>Defendant.</i>		

**DEFENDANT’S ORIGINAL ANSWER AND RESPONSE TO  
PLAINTIFF’S FIRST AMENDED PETITION AND APPLICATION FOR TEMPORARY  
INJUNCTION**

**TO THE HONORABLE JUDGE OF SAID COURT:**

Defendant, MaKenzie Calame (“Defendant”), appearing Pro Se, files this Original Answer and Response to Plaintiff’s First Amended Petition and Application for Temporary Injunction, and respectfully shows the Court as follows:

**I. GENERAL DENIAL (RULE 92)**

1. Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendant enters a GENERAL DENIAL of each and every, all and singular, allegations contained in Plaintiff’s First Amended Petition and demands strict proof thereof.

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## **II. SPECIFIC RESPONSE TO PLAINTIFF’S CAUSES OF ACTION**

### **2. Re: Defamation.**

Defendant denies that she made any false statements about Plaintiff with “actual malice.” Any statements or characterizations she made were based on:

- (a) Plaintiff’s own public statements on his podcast regarding his relationship with Texas A&M University;
- (b) Plaintiff’s official business accounts—including a bar business bearing his full legal name—initiating and maintaining direct contact with Defendant over an extended period of time; and
- (c) Direct communications from the person Defendant had been texting for approximately three years, whom she believed to be Plaintiff, in which he stated that he used his business account(s) as a way to give her “validity” and to shield her and her children from media attention.

Defendant understood this to mean that business-side engagement was intentional and authorized, and that any legal action would be directed at the business entity rather than at her as an individual.

Defendant’s belief that her communications and concerns were legitimate and grounded in reality was therefore reasonable. She did not “hallucinate” contact: the messages she received came from accounts bearing Plaintiff’s own name and branding, and from a person she reasonably believed was Plaintiff explaining why those channels were being used.

### **3. Re: Tortious Interference with Existing and Prospective Contracts.**

Defendant denies that she tortiously interfered with any existing or prospective contract of Plaintiff. In her written communications to third parties, Defendant expressly instructed that Plaintiff should suffer no retaliation and that his contracts should not be penalized as a result of her requests. (See Exhibit B.)

Defendant's purpose in contacting these entities was to protect herself and her minor children from a rapidly escalating national "stalker" narrative that appeared the weekend of the Super Bowl, not to damage Plaintiff's livelihood. Her intent was defensive: to stop a harmful label from being used to justify further harassment and fraudulent legal action against her, as had already occurred in a prior CPS/TRO case she ultimately won (Exhibit A). These facts are inconsistent with any intent to interfere with Plaintiff's business.

4. **Re: Harassment / Stalking.**

Defendant denies that she engaged in unlawful harassment or stalking of Plaintiff. Defendant's conduct fits a uniform pattern of protective boundary-setting across every area of her life, not a singular fixation on Plaintiff.

Specifically, Defendant issued nearly identical Cease and Desist demands to:

- (a) Her own biological father; and
- (b) Her former employer;

instructing them to stop using her children's names and likenesses, stop discussing her personal life, and stop participating in narratives that could endanger her parental rights. (Exhibit D.) Defendant was "clearing the field" of harmful narratives and unauthorized uses of her and her children's identities on all fronts. Plaintiff was one node in a larger, pre-existing pattern of harassment, suicide-swatting, and fraudulent filings directed at Defendant. Her actions were consistent and uniform, not targeted stalking of Plaintiff.

5. **Re: Injunctive Relief (Counts 3, 4, and 5).**

Defendant denies that Plaintiff is entitled to any form of injunctive relief. Injunctions are an extraordinary remedy, and here:

- (a) Defendant has already voluntarily deactivated her social media accounts;

- (b) Defendant has already changed her telephone number and limited access to it; and
- (c) Defendant has already ceased public commentary and outreach to Plaintiff's business associates.

Because the conduct complained of has ceased, and Defendant has no intent to resume it, there is no present or imminent "irreparable harm" or "emergency" to justify a temporary or permanent injunction. To the extent the Court views the existing TRO as having served as a "reset" on all communications, Defendant notes she has complied and gone further than required.

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### **III. FACTUAL BACKGROUND**

#### **A. Prior harassment, "suicide-swatting," and fraudulent filings**

6. Defendant is a mother of two minor children. For approximately the last two years, Defendant has been the target of an escalating pattern of harassment and false reports involving:

- (a) Impersonation of Defendant to suicide hotlines;
- (b) Third parties repeatedly calling law enforcement and CPS on Defendant; and
- (c) Use of Defendant's social media posts, taken out of context, to build fraudulent narratives that she was suicidal or unfit.

7. As reflected in a September 2025 court order from Freestone County (attached as Exhibit A), a prior Temporary Restraining Order and CPS removal of Defendant's child were found to be based on fraudulent or misleading evidence, and Defendant ultimately prevailed in that case.

8. In that proceeding, the evidence used against Defendant included social-media posts she had made about media personality Billy Liucci and TexAgs. Materials for that case were supplied to Defendant's ex-husband and his wife by Lexie Hudson, who was then engaged to

Defendant's former supervisor. Defendant will testify that Ms. Hudson and others had been monitoring, archiving, and sharing Defendant's posts for months before Defendant ever met her ex-husband's wife.

9. In March 2024, after Defendant publicly discussed issues involving Mr. Liucci and TexAgs, Ms. Hudson contacted Defendant's mother stating she had "enough information" to have Defendant placed in a psychiatric hold. Shortly thereafter, law enforcement appeared at Defendant's residence for a welfare check. College Station Police later recommended that Defendant open a harassment case against the individuals repeatedly calling and showing up at her home. (See harassment correspondence, Exhibit E.)

10. Defendant will further testify that a camera at her then-workplace was turned on her while she was employed there, and she was warned that if she did not stop talking about Mr. Liucci and TexAgs, she could lose her job. This contributed to Defendant leaving that employment due to harassment and surveillance concerns.

B. Shift from "suicide" narrative to "stalker" narrative

11. After the "suicide" storyline failed to result in any finding of mental illness or loss of parental rights—and after Defendant prevailed in the Freestone County matter—the pattern shifted. Third parties began attempting to rebrand Defendant as a "stalker" of Plaintiff.

12. Defendant will testify that anonymous accounts and associates of Mr. Liucci started circulating the term "stalker" online in connection with Defendant before any Cameo video or podcast clip surfaced, and even attempted to prompt AI systems to label Defendant a "stalker."

Those systems declined to do so based on the information provided.

13. In early 2024, during the period when third parties were attempting to frame Defendant as suicidal and unfit, Defendant began receiving anonymous text messages from numbers she did not recognize, purporting to speak for Plaintiff and telling her she was “not covered” and should be quiet. Defendant believed these were impersonations or intermediaries, not Plaintiff himself, and viewed them as part of the same coordinated effort to manufacture a narrative against her rather than genuine communication from Plaintiff.

C. Cameo video, Super Bowl podcast clip, and why Defendant did not believe them

14. In early February 2026, a short “Cameo-style” video in which Plaintiff appeared to use the word “stalker” in reference to Defendant began circulating on Facebook and other social media. The video did not originate from any verified account of Plaintiff, and was first seen by Defendant when her own mother texted it to her.

15. The account that originally posted or circulated the video publicly used the name “Concerned Citizen.” Plaintiff himself never posted that video to any of his verified platforms, never tagged Defendant in it, and never sent it to Defendant directly.

16. Based on the video quality, the distortions in the clip, and her own knowledge of her relationship and communications with the person she had been texting and believed to be Plaintiff, Defendant did not believe the video was authentic or fairly representative. To verify its origin, Defendant contacted Cameo to ask whether the clip actually came from their platform or could have been altered or generated by AI. (Exhibit F: Cameo inquiry.)

17. Separately, during the Super Bowl, a clip aired on the “Impulsive” podcast in which Plaintiff was allegedly FaceTimed on camera by co-host Mike Majlak while another host used the term “stalker.” Again, Plaintiff never posted or shared this clip on any of his verified

accounts, and Defendant viewed it as a media bit produced and controlled by third parties, not by Plaintiff personally.

18. Critically, to the best of Defendant’s knowledge, the person she had been texting for approximately three years—whom she believed to be Plaintiff—sent her a “Happy Valentine’s Day” message after both of these “stalker” pieces (the Cameo clip and the podcast bit) had already circulated online. That direct, private communication, combined with his failure to share or endorse the “stalker” content on his own pages, further led Defendant to believe the public clips were not genuine or were being weaponized without his consent.

D. Lexie Hudson cease-and-desist and escalation toward Defendant

19. Shortly before Defendant began sending her own Cease and Desist letters, she was served with a cease-and-desist demand from Lexie Hudson—the same individual who had previously:

(a) Been engaged to Defendant’s boss when Defendant first went public about her history with Plaintiff;

(b) Provided material used to support the fraudulent TRO to remove Defendant’s child in Freestone County; and

(c) Communicated with Defendant’s ex-husband and his wife about Defendant months before Defendant ever met the wife.

20. In Defendant’s view, Ms. Hudson’s cease-and-desist was not about protecting Plaintiff, but about preserving and escalating the same pattern of third-party control and harassment that had already resulted in a wrongful removal of Defendant’s child once before.

E. Defendant's own Cease and Desist campaign

21. Approximately three days after the Super Bowl “stalker” bit and after receiving the Valentine’s Day message from the person she believed to be Plaintiff, Defendant began issuing her own Cease and Desist letters.

22. Defendant’s letters—addressed to media companies, brands, talent handlers, and other third parties—were intended to:

(a) Stop the spread of a “stalker” label on a national stage, which Defendant reasonably believed could be used to trigger another round of fraudulent CPS and law-enforcement involvement against her; and

(b) Put potential bad actors on notice that her image, her children, and any depictions of her relationship with Plaintiff were not to be used as content, skits, or brand campaigns without her consent.

23. Defendant did not limit these Cease and Desist letters to Plaintiff’s business partners. She sent similar demands to her own biological father and to her former employer, instructing them:

- Not to discuss her, Plaintiff, or her children;
- Not to possess or request photos of her children; and
- Not to repeat or fuel narratives that could endanger her parental rights.

(See Exhibit D.)

24. This uniform pattern shows Defendant's goal was to protect her children and privacy across all areas of her life, not to target Plaintiff in particular.

25. In all such letters, Defendant consistently wrote that her communications were not being made "on behalf of" Plaintiff, and she explicitly stated: "He should not suffer any retaliation to any current contracts." (Exhibit B: Representative Cease and Desist letters.)

26. Defendant's Cease and Desist campaign lasted approximately two weeks. The day after Defendant sent a Cease and Desist to some of the same parties who had been involved in the previous fraudulent TRO concerning her son, this lawsuit was filed.

F. Plaintiff's own business outreach and ongoing social media monitoring

27. For over a year before the "stalker" narrative surfaced, Plaintiff's own business entities—including a verified account for a bar business carrying his name—initiated and maintained contact with Defendant. (Exhibit C.)

28. Defendant posted an Instagram story that she was at that bar; the official bar account "liked" the story, and other messages from business-side accounts bearing Plaintiff's branding were sent to Defendant.

29. Defendant will testify that Plaintiff never blocked her, never sent any direct instruction from a verified account telling her to stop posting, and never personally posted any statement calling her a "stalker."

30. Approximately four (4) hours after Defendant was served with this lawsuit, Plaintiff was again observed viewing Defendant's social media content. To Defendant, this confirmed that Plaintiff (or those operating his accounts) continued to monitor her activity rather than seeking distance.

G. Texas A&M PIRs and Defendant's advocacy role

31. Plaintiff's First Amended Petition references Defendant's statements concerning Plaintiff and Texas A&M University, implying that Defendant fabricated or exaggerated "turmoil" between Plaintiff and Texas A&M.

32. Beginning on or about October 6, 2025, Defendant filed a series of formal Public Information Requests ("PIRs") directed to Texas A&M University and related entities, seeking records concerning finances, contracts, NIL arrangements, and other money flows connected to Plaintiff's name, image, and likeness and to his time associated with Texas A&M. (Collectively, the "TAMU PIRs," attached in summary form as Exhibit H.)

33. Defendant's social media commentary about Plaintiff and Texas A&M was grounded in:

(a) Plaintiff's own public statements on his podcast after a College GameDay appearance, where he indicated his relationship with Texas A&M was "in question" and stated he would not "touch on it too much"; and

(b) The nature of the responses (and non-responses) Defendant received to her TAMU PIRs, which raised questions for her about how Plaintiff's NIL and related economic value had been handled by institutional actors.

34. Defendant's intent was to act as an advocate, not an adversary, for Plaintiff. Her posts focused on the belief that Plaintiff had been mistreated by the broader system, that his NIL and image had been used in ways that benefitted others more than him, and that the public had a right to see the underlying contracts and dollar amounts.

35. Defendant denies that she sought to “create” turmoil between Plaintiff and Texas A&M. Any perception of strain arose from Plaintiff’s own remarks and from Texas A&M’s handling of information, not from malice or fabrication by Defendant.

#### H. Documentation of unsolicited outreach by Plaintiff’s business entities

36. Defendant further shows that Plaintiff’s allegations of “harassment” are contradicted by Plaintiff’s own business records. Throughout 2024, the official business account @johnnymoneybar initiated a consistent pattern of unsolicited outreach to Defendant, including but not limited to:

- March 2024: An unsolicited advertisement sent to Defendant, to which Defendant explicitly responded, “GO AWAY.”
- April 2024: A reel of Plaintiff’s football highlights sent to Defendant, to which she responded, “Lmao creep.”
- May 2024: A podcast reel of Plaintiff sent to Defendant, to which she responded, “I’ll take things I don’t care about for \$500.”

37. This evidence, contained in Exhibit C, demonstrates that Defendant’s responses were consistently dismissive and aimed at ending the interaction. It is legally inconsistent for Plaintiff to claim “stalking” or “harassment” when his own authorized business agents were persistently pushing content into Defendant’s private inbox despite being told to stop. Defendant was the one telling his business, in plain language, to “go away.”

#### I. Post-TRO monitoring by Plaintiff

38. On the very day the current Temporary Restraining Order was issued in this case, Plaintiff's verified personal Instagram account (@jmanziel2) was observed viewing Defendant's Instagram "stories."

39. Screenshots attached as Exhibit G show Plaintiff's verified account appearing at the top of the viewer list on five (5) separate Instagram stories—within hours of Defendant being served with the TRO.

40. This voluntary monitoring of Defendant's social media by Plaintiff, immediately after obtaining an "emergency" order, demonstrates that Plaintiff does not genuinely fear Defendant and that no true emergency exists. Rather, it shows that Plaintiff (or those operating his account) continues to seek out Defendant's content by choice.

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#### **IV. RESPONSE TO PLAINTIFF'S APPLICATION FOR TEMPORARY INJUNCTION**

##### **A. Lack of malice; defensive purpose of the emails**

41. Defendant denies the allegations that she is a "stalker" or that she acted with malice to interfere with Plaintiff's contractual relations.

42. As described above, Defendant had already experienced a wrongful TRO and child removal built on fraudulent evidence. When the "stalker" narrative was suddenly elevated to a national stage (via the Cameo-style clip and Super Bowl podcast bit), Defendant reasonably believed it could be used as pretext for a second round of fraudulent filings against her and her children.

43. Defendant’s outreach to media companies, brand partners, and other entities was therefore defensive in nature: to stop the spread of a label that had already once been used to justify extreme legal actions against her family.

44. Defendant’s uniform pattern—sending similar Cease and Desist letters even to her own father and former employer—demonstrates that her intent was to protect her children and her privacy from any and all third parties, not to target Plaintiff’s livelihood.

45. In multiple letters, Defendant specifically wrote that Plaintiff “should not suffer any retaliation to any current contracts,” which is flatly inconsistent with an intent to tortiously interfere with those contracts.

B. Plaintiff has not shown irreparable harm; conduct has already ceased

46. Defendant has already voluntarily taken steps that go beyond what Plaintiff requests in his Application:

(a) Deactivated all of her primary social media accounts;

(b) Changed her telephone number and shared it with almost no one; and

(c) Ceased public commentary about Plaintiff and ceased contacting his business partners.

47. Defendant was not ordered in the TRO to preserve electronics or social media accounts; nevertheless, she chose to remove her online presence in order to protect her children and limit further harassment.

48. Because the complained-of communications and postings have already ceased, there is no ongoing or imminent conduct for a temporary injunction to restrain. Under Texas law, injunctive relief is an extraordinary remedy and is not appropriate where the alleged conduct has already stopped and Plaintiff can be fully compensated, if at all, through ordinary legal remedies.

49. Plaintiff's own conduct—voluntarily viewing Defendant's Instagram stories on the very day the TRO was issued, and his businesses continuing to send her content even after she told them to “go away”—is inconsistent with any claim of irreparable harm or genuine fear. A person seeking protection does not seek out and repeatedly monitor the person they claim to be afraid of.

C. No evidence of a probable right to prevail on tortious interference

50. To the extent Plaintiff seeks injunctive relief based on alleged tortious interference,

Defendant asserts that Plaintiff cannot establish a probable right of recovery because:

(a) Defendant expressly told third parties in writing that Plaintiff should not be penalized or have

his contracts harmed as a result of her requests;

(b) Defendant's outreach was plainly focused on preventing misuse of her name, image, and family—and the spread of the “stalker” label—not on disrupting any specific contract identified

in the Petition; and

(c) Plaintiff's own history of allowing his branded business accounts to contact Defendant, “like” her posts, and view her stories, undercuts the narrative that her existence online was unwanted or

unforeseeably harmful.

51. Defendant therefore contends that Plaintiff has not shown a probable right to recover on

his claims sufficient to justify a temporary injunction.

D. No need for further injunctive orders

52. Given Defendant's voluntary compliance, the lack of ongoing conduct to restrain, the defensive nature of her prior communications, and Plaintiff's failure to demonstrate irreparable

harm or a probable right to prevail, Defendant respectfully submits that:

- (a) The existing Temporary Restraining Order should be dissolved; and
- (b) Plaintiff's Application for Temporary Injunction should be denied in its entirety.

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#### **V. VOLUNTARY COMPLIANCE (FOR RECORD)**

53. Without admitting liability or wrongdoing, Defendant notes for the Court's record that:

- (a) She has voluntarily deactivated her primary social media accounts;
- (b) She has voluntarily changed her phone number and restricted access to it; and
- (c) She has voluntarily ceased emailing or contacting Plaintiff's business partners.

54. Defendant states to the Court that she has no desire to contact Plaintiff going forward, and that she wishes to be left alone to raise her children in peace, without further media narratives, third-party campaigns, or legal weaponization of her private life.

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#### **VI. PRAYER**

WHEREFORE, PREMISES CONSIDERED, Defendant, MaKenzie Calame, respectfully prays  
that upon hearing, the Court:

1. DENY Plaintiff's Application for Temporary Injunction;
2. DISSOLVE the existing Temporary Restraining Order;
3. TAX COSTS against Plaintiff; and

4. Grant Defendant such other and further relief, at law or in equity, to which she may be  
justly entitled.

5. Defendant further prays that Plaintiff be ordered to issue a formal written retraction and  
apology for the false 'stalking' and 'harassment' allegations, which are contradicted by Plaintiff's  
own voluntary monitoring of Defendant (Exhibit G).

Respectfully submitted,

—

MaKenzie Calame, Pro Se

1311 McQueeney Dr.

College Station, TX 77845

—

#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on counsel for  
Plaintiff, Aron Hutchins, attorney for Johnny Manziel, via electronic service through the  
state e-filing system and by email at aron@holthutchins.com on this the 5th day of  
March, 2026.

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MaKenzie Calame

Defendant, Pro Se

**UNSWORN DECLARATION (Texas Civ. Prac. & Rem. Code § 132.001)**

My name is MaKenzie Calame, my date of birth is October 4, 1993,  
and my address is 1311 McQueeney Dr., College Station, TX 77845. I declare under penalty of  
perjury that the foregoing Defendant's Original Answer and Response is true and correct.

Executed in Brazos County, State of Texas, on the 5th day of March, 2026.

A handwritten signature in black ink, appearing to read 'MaKenzie Calame', with a long horizontal flourish extending to the right.

## DEFENDANT'S EXHIBIT LIST

The following exhibits are attached in support of Defendant's Original Answer and Response to Plaintiff's First Amended Petition and Application for Temporary Injunction:

- **Exhibit A:** Certified copies of the September 9, 2025, Freestone County Temporary Restraining Order, Writ of Attachment, Order to Appear, and related orders in In the Interest of Jonah Jamal Carter, a Child (Cause No. CV22012, 77th Judicial District Court).
- **Exhibit B:** Representative Cease and Desist letters sent by the defendant in February 2026 to various media companies, brands, and third parties, which include language stating the plaintiff should not suffer contract retaliation.
- **Exhibit C:** Screenshots of Instagram messages between the defendant and @johnnymoneybar (along with other branded accounts), showing unsolicited outreach and the defendant's dismissive responses.
- **Exhibit D:** Cease and Desist letters sent by the defendant to her former employer and biological father regarding the use of her and her children's personal information and photos.
- **Exhibit E:** Correspondence with the College Station Police Department regarding harassment and welfare checks, documenting recommendations to open a harassment case.
- **Exhibit F:** The defendant's inquiry to Cameo concerning the origin and authenticity of the "stalker" video clip.
- **Exhibit G:** Screenshots showing the plaintiff's verified Instagram account (@jmanziel2) viewing the defendant's Instagram stories on September 14, 2025, and February 27, 2026 (the day the TRO was issued).
- **Exhibit H:** A summary chart of the defendant's Texas A&M Public Information Requests (TAMU PIRs) concerning the plaintiff's NIL, contracts, and related records.

Respectfully submitted,

MaKenzie Calame, Pro Se

1311 McQueeney Dr.  
College Station, TX 77845

CAUSE NO. 26-000495-CV-472

JOHNNY MANZIEL v

*Plaintiff*

MAKENZIE CARTER aka

MAKENZIE CALAME

*Defendant*

## **EXHIBIT A**

Certified copies of the September 9, 2025, Freestone County Temporary Restraining Order, Writ of Attachment, Order to Appear, and related orders in In the Interest of Jonah Jamal Carter, a Child (Cause No. CV22012, 77th Judicial District Court).



September 9, 2025  
17:07



September 9, 2025  
17:07



Temporary Restraining Order-Class 3 Rule 687 Civil Procedure

THE STATE OF TEXAS

SERVE

To: MAKENZIE ELIZABETH CALAME 1311 MCQUEENY STREET, COLLEGE STATION TEXAS 77845

Greeting:

WHEREAS, Plaintiff filed her TEMPORARY RESTRAINING ORDER AND ORDER SETTING HEARING FOR TEMPORARY ORDERS in the District Court of Freestone County, Texas, on September 09, 2025, AD, in a suit numbered CV22012 on the Docket of said Court, wherein, JARANTE JAMAL CARTER, Plaintiffs and MAKENZIE ELIZABETH CALAME Defendants alleging (SEE TEMPORARY RESTRAINING ORDER) and upon presentation of said petition to him and consideration thereof, the Honorable District Judge of said court, made the following order thereon:

See Attached TEMPORARY RESTRAINING ORDER

You are therefore commanded to desist and refrain from:

See Attached TEMPORARY RESTRAINING ORDER

until and pending the hearing of such petition upon plaintiff's application for a temporary injunction before the judge of said court at 9:00 A.M. on the 17 TH day of SEPTEMBER, 2025, in the District court room in the court house of FREESTONE, County, in the City of FAIRFIELD, Texas when and where you will appear to show cause why injunction should not be granted upon such petition effective until final decree in such suit.

Issued: September 9, 2025

Given under my hand and seal of said court, at office in Fairfield, Texas this.

TERESA BLACK District Clerk  
Freestone County, Texas

*Alexandra Black*  
Deputy



OFFICERS RETURN

CAUSE NO: CV22012

DIRECTED TO: MAKENZIE ELIZABETH CALAME 1311 MCQUEENY STREET, COLLEGE STATION TEXAS 77845

DATE CITATION ISSUED: September 9, 2025

Came to hand on 9 day of September at 4:15 o'clock P M. and:

executed it by delivering a copy of this citation with the date of delivery endorsed on it to defendant.

140 Graham Rd College Station, TX  
in person on the 9 day of September, 2025 at 4 o'clock 45 P M.  
at \_\_\_\_\_; or

executed it by mailing a copy of the citation via registered /certified mail on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

To defendant \_\_\_\_\_

Attaching the return receipt, with the addressee's signature, to the return: or

did not execute it because \_\_\_\_\_

Total Fee: \$ \_\_\_\_\_

*J.P. Ferguson*  
Sheriff/Constable/District Clerk

Of 890205 County, Texas

By: *Paul Conner*  
Deputy

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT

"My name is \_\_\_\_\_, my date of birth is \_\_\_\_\_, and my address is \_\_\_\_\_

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in \_\_\_\_\_ County, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

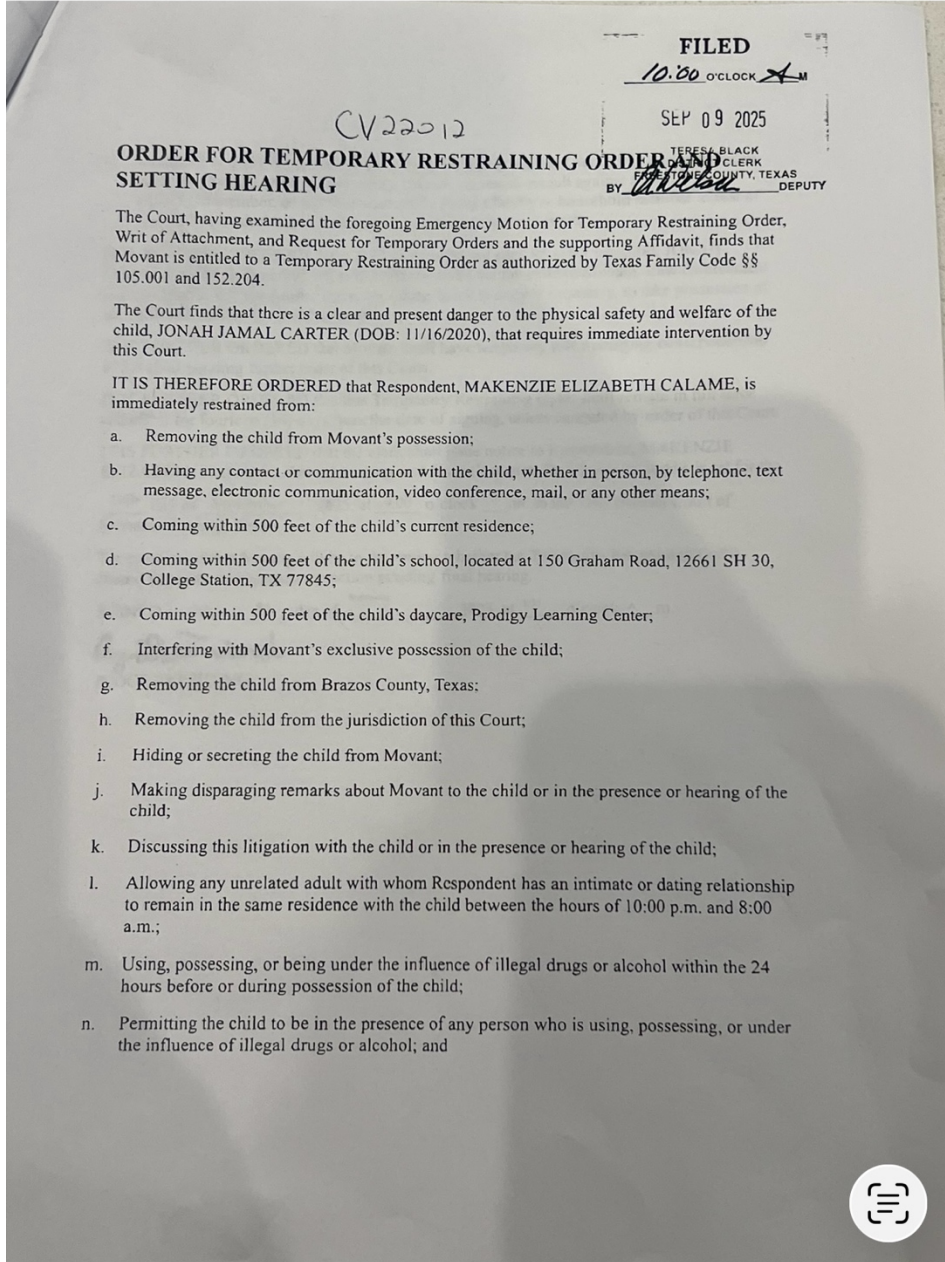
Declarant/Authorized Process Server \_\_\_\_\_

(Id# & expiration of certificate) \_\_\_\_\_



September 9, 2025

17:07





September 9, 2025  
17:07



<p>CAUSE NO. CV22012</p>	<p><b>OFFICER'S RETURN</b></p>
<p>In the District Court of Freestone County, Texas</p>	<p>CAME TO HAND ON THE _____ DAY OF _____ A.D.,</p>
<p><b>TEMPORARY RESTRAINING ORDER AND ORDER SETTING HEARING FOR TEMPORARY ORDERS</b></p>	<p>200_ AT _____ O'CLOCK _____ M., AND EXECUTED ON THE _____ DAY OF _____ A.D., 200_ AT _____ O'CLOCK _____ M.,</p>
<p><b>IN THE INTEREST OF JONAH JAMAL CARTER A CHILD</b></p>	<p>BY DELIVERING TO WITHIN NAMED _____ _____ IN PERSON A TRUE COPY OF THIS WRIT AT _____ COUNTY TEXAS.</p>
<p>September 9, 2025</p> <p>Teresa Black, District Clerk Freestone County, Texas</p> <p><i>Alexander Halseth</i> Deputy</p>	<p>_____ _____ BY _____</p>



September 9, 2025  
17:07

September 9, 2025  
17:07

CV 22012  
**ORDER FOR TEMPORARY RESTRAINING ORDER AND  
SETTING HEARING**

**FILED**  
10:00 O'CLOCK A.M.  
SEP 09 2025  
TERESA BLACK  
CLERK  
FREESTONE COUNTY, TEXAS  
BY *[Signature]* DEPUTY

The Court, having examined the foregoing Emergency Motion for Temporary Restraining Order, Writ of Attachment, and Request for Temporary Orders and the supporting Affidavit, finds that Movant is entitled to a Temporary Restraining Order as authorized by Texas Family Code §§ 105.001 and 152.204.

The Court finds that there is a clear and present danger to the physical safety and welfare of the child, JONAH JAMAL CARTER (DOB: 11/16/2020), that requires immediate intervention by this Court.

IT IS THEREFORE ORDERED that Respondent, MAKENZIE ELIZABETH CALAME, is immediately restrained from:

- a. Removing the child from Movant's possession;
- b. Having any contact or communication with the child, whether in person, by telephone, text message, electronic communication, video conference, mail, or any other means;
- c. Coming within 500 feet of the child's current residence;
- d. Coming within 500 feet of the child's school, located at 150 Graham Road, 12661 SH 30, College Station, TX 77845;
- e. Coming within 500 feet of the child's daycare, Prodigy Learning Center;
- f. Interfering with Movant's exclusive possession of the child;
- g. Removing the child from Brazos County, Texas;
- h. Removing the child from the jurisdiction of this Court;
- i. Hiding or secreting the child from Movant;
- j. Making disparaging remarks about Movant to the child or in the presence or hearing of the child;
- k. Discussing this litigation with the child or in the presence or hearing of the child;
- l. Allowing any unrelated adult with whom Respondent has an intimate or dating relationship to remain in the same residence with the child between the hours of 10:00 p.m. and 8:00 a.m.;
- m. Using, possessing, or being under the influence of illegal drugs or alcohol within the 24 hours before or during possession of the child;
- n. Permitting the child to be in the presence of any person who is using, possessing, or under the influence of illegal drugs or alcohol; and

- o. Engaging in any activity that would constitute family violence, including acts intended to result in physical harm, bodily injury, assault, or sexual assault against a family or household member, or acts that reasonably place a family or household member in fear of imminent physical harm, bodily injury, assault, or sexual assault.

IT IS FURTHER ORDERED that a Writ of Attachment shall issue for the child, JONAH JAMAL CARTER, directing any peace officer to deliver the child to Movant. Law enforcement is authorized to use reasonable force, including forcible entry if necessary, to take possession of the child and deliver the child to Movant.

IT IS FURTHER ORDERED that Movant shall have temporary sole managing conservatorship of the child pending further order of this Court.

IT IS FURTHER ORDERED that this Temporary Restraining Order shall remain in full force and effect for fourteen (14) days from the date of signing, unless extended by order of this Court.

IT IS FURTHER ORDERED that the clerk shall issue notice to Respondent, MAKENZIE ELIZABETH CALAME, that the hearing on Movant's request for temporary orders is set for the 17th day of September, 2025, at 9:00 o'clock a.m. in the 77th District Court of Freestone County, Texas.

The purpose of this hearing will be to determine whether the Temporary Restraining Order should be made a temporary injunction pending final hearing.

SIGNED on this the 9th day of September, 2025, at 8:30 o'clock A.m.

*[Signature]*  
JUDGE PRESIDING



September 9, 2025  
17:07



September 9, 2025  
17:08



CV 22012

10:00 O'CLOCK A.M.  
SEP 09 2025  
TERESA BLACK  
DISTRICT CLERK  
FREESTONE COUNTY TEXAS  
BY: *[Signature]* DEP

**ORDER TO APPEAR**

IT IS ORDERED that Respondent, MAKENZIE ELIZABETH CALAME, appear in person before this Court in the courthouse at Fairfield, Texas, on the 17th day of September, 2025, at 9:00 o'clock a.m., to respond to the Motion for Enforcement of Possession or Access filed by JARANTE JAMAL CARTER.

FAILURE TO APPEAR MAY RESULT IN A WARRANT BEING ISSUED FOR YOUR ARREST.

SIGNED on the 9th day of September, 2025.

*[Signature]*

JUDGE PRESIDING

WRIT OF ATTACHMENT (CHILD)

THE STATE OF TEXAS

**SERVE**

CAUSE NO. CV22012

IN THE 77TH JUDICIAL DISTRICT COURT OF  
FREESTONE COUNTY, TEXAS

IN THE INTEREST OF \*  
JONAH JAMAL CARTER \*  
A CHILD \*

TO ANY SHERIFF OR ANY CONSTABLE WITHIN THE STATE OF TEXAS

**GREETING:**

WHEREAS, in the above numbered and entitled cause, on the 9th day of **SEPTEMBER**, 2025, the Petitioner made and filed his Petition as required by law, and has applied for a writ of attachment;

NOW THEREFORE, we command you that you attach forthwith the following child:

NAME: **JONAH JAMAL CARTER**  
SEX: **MALE**  
ADDRESS : **1311 MCQUEENY STREET, COLLEGE STATION TEXAS 77845**

and deliver him safely to Petitioner **JARANTE JAMAL CARTER**. You will true return make of this writ showing how you have executed the same.

Given under my hand and seal of said Court on this September 9, 2025.

TERESA BLACK, District Clerk of Freestone County

*[Signature]*  
Deputy

CAUSE NO. CV22012

**WRIT OF ATTACHMENT**

IN THE INTEREST OF  
**JONAH JAMAL CARTER**

A CHILD

IN THE 77<sup>TH</sup> JUDICIAL COURT  
OF FREESTONE COUNTY, TEXAS

Issued September 9, 2025.

TERESA BLACK, District Clerk  
Freestone County, Texas

*Alexa deWelsch*  
DEPUTY

OFFICER'S RETURN

CAME TO HAND ON THE 9<sup>th</sup> DAY OF September A.D., 2025  
AT 4 O'CLOCK 31 P M. EXECUTED AT (ADDRESS) 140 Graham  
Rd. College Station, TX IN Brazos COUNTY  
AT 4:31 O'CLOCK p M. ON THE 9<sup>th</sup> DAY OF September  
A.D., 2025 BY DELIVERING TO THE SAID NAMED CHILD: JONAH JAMAL CARTER

TO: Jarante Jamal Carter  
found in the possession of JARANTE JAMAL CARTER

TO CERTIFY WHICH I AFFIX MY HAND OFFICIALLY THIS 9 DAY OF September 2025

J N INGRAM  
SHERIFF/CONSTABLE

BRENT  
COUNTY/PARISH

DEPUTY

FEES:

September 9, 2025  
17:08





September 9, 2025

17:09



September 9, 2025

17:09



CV22012  
**ORDER FOR TEMPORARY RESTRAINING ORDER AND SETTING HEARING**

FILED  
10:00 o'clock  
SEP 09 2025  
TERESA BLACK  
CLERK  
77TH DISTRICT COURT, TEXAS  
BY [Signature] DEPUTY

The Court, having examined the foregoing Emergency Motion for Temporary Restraining Order, Writ of Attachment, and Request for Temporary Orders and the supporting Affidavit, finds that Movant is entitled to a Temporary Restraining Order as authorized by Texas Family Code §§ 105.001 and 152.204.

The Court finds that there is a clear and present danger to the physical safety and welfare of the child, JONAH JAMAL CARTER (DOB: 11/16/2020), that requires immediate intervention by this Court.

IT IS THEREFORE ORDERED that Respondent, MAKENZIE ELIZABETH CALAME, is immediately restrained from:

- a. Removing the child from Movant's possession;
- b. Having any contact or communication with the child, whether in person, by telephone, text message, electronic communication, video conference, mail, or any other means;
- c. Coming within 500 feet of the child's current residence;
- d. Coming within 500 feet of the child's school, located at 150 Graham Road, 12661 SH 30, College Station, TX 77845;
- e. Coming within 500 feet of the child's daycare, Prodigy Learning Center;
- f. Interfering with Movant's exclusive possession of the child;
- g. Removing the child from Brazos County, Texas;
- h. Removing the child from the jurisdiction of this Court;
- i. Hiding or secreting the child from Movant;
- j. Making disparaging remarks about Movant to the child or in the presence or hearing of the child;
- k. Discussing this litigation with the child or in the presence or hearing of the child;
- l. Allowing any unrelated adult with whom Respondent has an intimate or dating relationship to remain in the same residence with the child between the hours of 10:00 p.m. and 8:00 a.m.;
- m. Using, possessing, or being under the influence of illegal drugs or alcohol within the 24 hours before or during possession of the child;
- n. Permitting the child to be in the presence of any person who is using, possessing, or under the influence of illegal drugs or alcohol; and

- o. Engaging in any activity that would constitute family violence, including acts intended to result in physical harm, bodily injury, assault, or sexual assault against a family or household member, or acts that reasonably place a family or household member in fear of imminent physical harm, bodily injury, assault, or sexual assault.

IT IS FURTHER ORDERED that a Writ of Attachment shall issue for the child, JONAH JAMAL CARTER, directing any peace officer to deliver the child to Movant. Law enforcement is authorized to use reasonable force, including forcible entry if necessary, to take possession of the child and deliver the child to Movant.

IT IS FURTHER ORDERED that Movant shall have temporary sole managing conservatorship of the child pending further order of this Court.

IT IS FURTHER ORDERED that this Temporary Restraining Order shall remain in full force and effect for fourteen (14) days from the date of signing, unless extended by order of this Court.

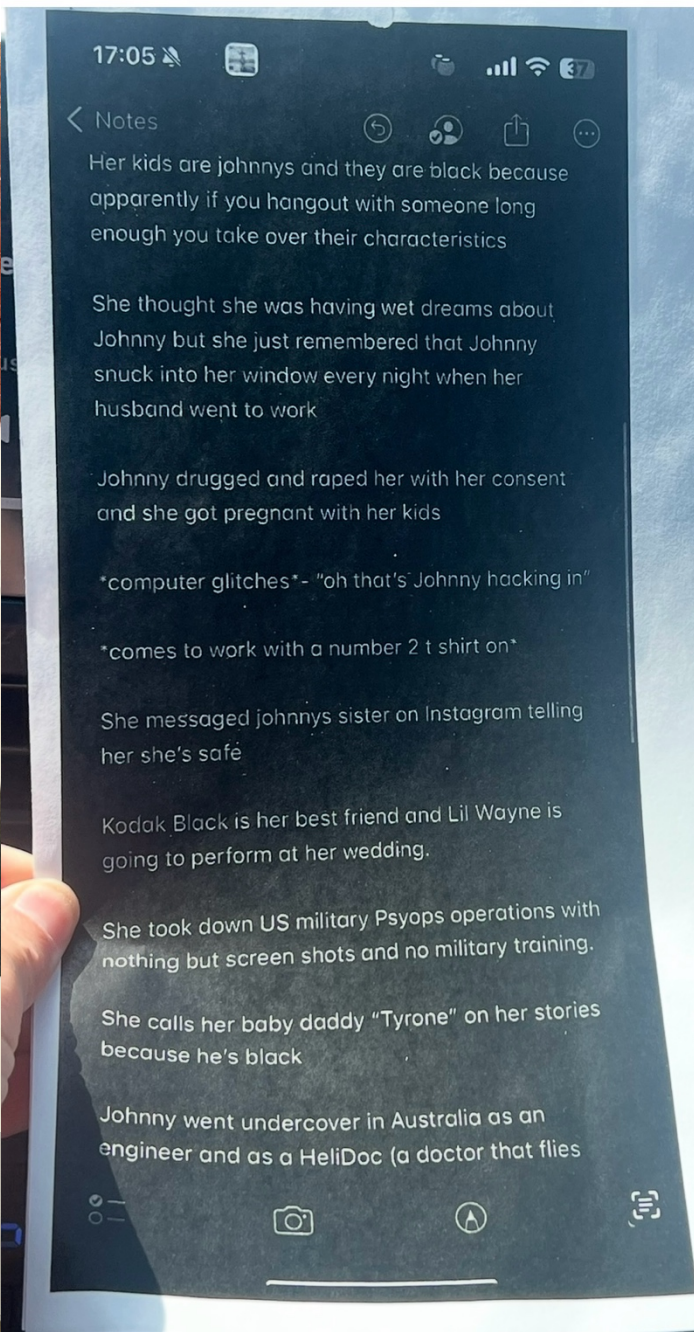
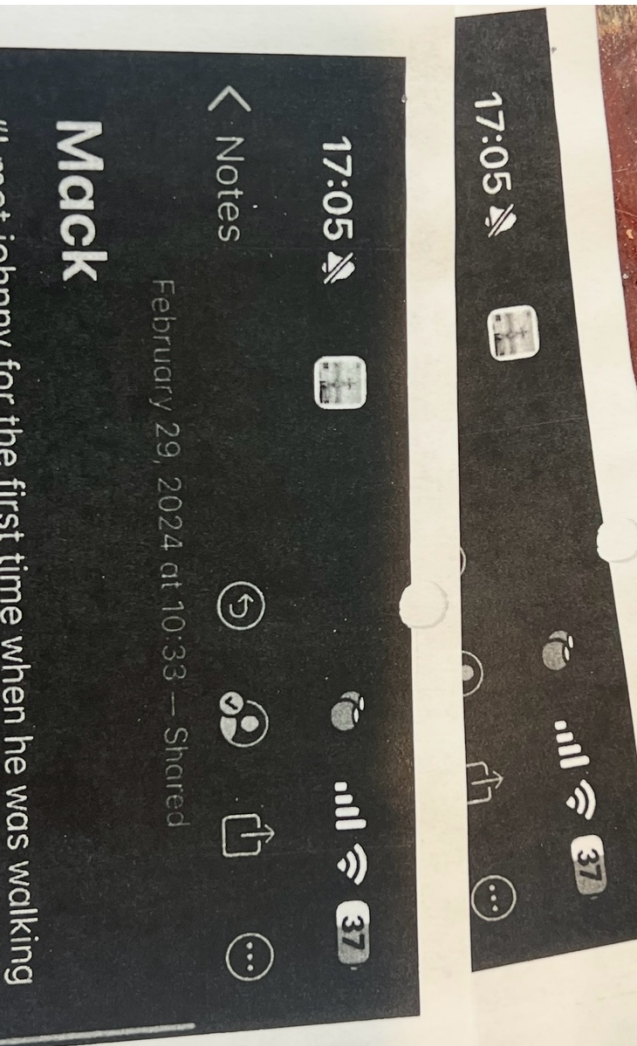
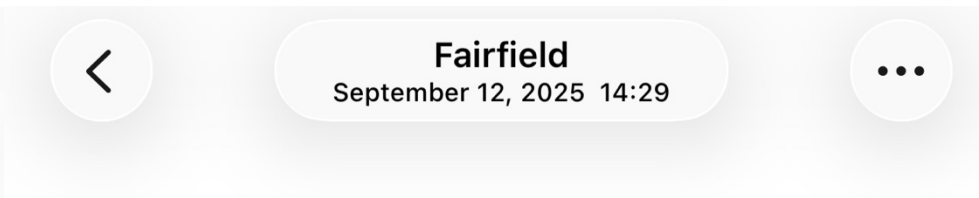
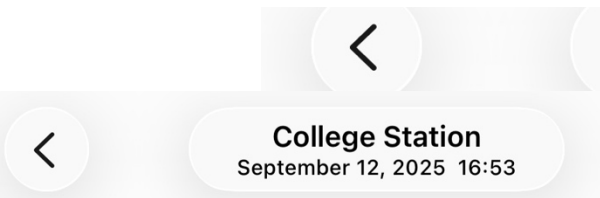
IT IS FURTHER ORDERED that the clerk shall issue notice to Respondent, MAKENZIE ELIZABETH CALAME, that the hearing on Movant's request for temporary orders is set for the 17th day of September, 2025, at 9:00 o'clock a.m. in the 77th District Court of Freestone County, Texas.

The purpose of this hearing will be to determine whether the Temporary Restraining Order should be made a temporary injunction pending final hearing.

SIGNED on this the 9th day of September, 2025, at 8:30 o'clock a.m.

[Signature]  
JUDGE PRESIDING





These are notes her previous employer took of her mental state and behaviour

Notes that Lexie Hudson and Georgia White fabricated and submitted to Freestone County

CAUSE NO. 26-000495-CV-472

JOHNNY MANZIEL v

*Plaintiff*

MAKENZIE CARTER aka

MAKENZIE CALAME

*Defendant*

**Exhibit B:**

Representative Cease and Desist letters sent by the defendant in February 2026 to various media companies, brands, and third parties, which include language stating the plaintiff should not suffer contract retaliation.

5:43



PREEMPTIVE CEASE & DESIST –  
FAMILY-LEVEL INTERFERENCE,  
COORDINATED FALSE  
NARRATIVES, RETALIATION  
IMPACTING MY CHILDREN,  
MISUSE OF SOCIAL/MEDIA  
NARRATIVES, AND  
PRESERVATION OF EVIDENCE



Inbox



me Feb 18  
to tmalechek, dallas, info, l... v



MaKenzie Calame  
1311 McQueeney Drive  
College Station, TX 77845  
Phone: 903.388.2806  
Email: [makenzie.calame13@gmail.com](mailto:makenzie.calame13@gmail.com)

February 18, 2026

← Reply

→ Forward



CHILDREN, MISUSE OF SOCIAL/MEDIA  
NARRATIVES, AND PRESERVATION OF  
EVIDENCE

5:44



Mr. Malechek and Ms. Manziel Malechek:

This correspondence constitutes a formal, preemptive demand that each of you, jointly and individually, and any person acting at your direction or in concert with you, immediately CEASE AND DESIST from:

1. Participating in, contributing to, or amplifying any false or misleading narratives regarding my mental health;
2. Participating in, contributing to, or amplifying any false or misleading narratives that I am "stalking" Johnny Manziel; and
3. Any direct or indirect involvement in matters concerning my children, my parental rights, or my private life.

All statements below are made as statements of what I believe and understand to be true, based on my own observations, experiences, and information available to me at this time.

**1. FAMILY-LEVEL PARTICIPATION AND USE OF LOCAL INFLUENCE**

← Reply

→ Forward





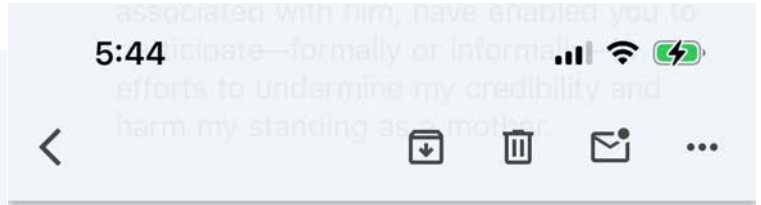
## 1. FAMILY-LEVEL PARTICIPATION AND USE OF LOCAL INFLUENCE

I believe that:

- As individuals connected to and aligned with the Adam family and its extended network, you have been aware of, participated in, and/or supported conversations and actions concerning me and my children;
- Your proximity to, and relationship with, Donald J. "Don" Adam, and the business, social, and institutional networks associated with him, have enabled you to participate—formally or informally—in efforts to undermine my credibility and harm my standing as a mother.

I further believe that:

- You have taken advantage of access to contacts, relationships, and networks tied to Mr. Adam and his business and institutional roles, and have used those contacts to:
  - Influence what is said publicly and



I further believe that:

- You have taken advantage of access to contacts, relationships, and networks tied to Mr. Adam and his business and institutional roles, and have used those contacts to:
  - Influence what is said publicly and privately about me;
  - Coerce, encourage, or "steer" what others—particularly individuals with public platforms or institutional roles—say about me; and/or
  - Assist in the creation, approval, publication, or circulation of statements, content, or narratives intended to discredit me or portray me in a false and defamatory light.

To the extent that either or both of you have:

- Repeated, endorsed, or encouraged characterizations of me as unstable, dangerous, or a "stalker";
- Encouraged others to adopt or repeat those characterizations; or





To the extent that either or both of you have:

- Repeated, endorsed, or encouraged characterizations of me as unstable, dangerous, or a “stalker”;
- Encouraged others to adopt or repeat those characterizations; or
- Supported, directly or indirectly, efforts that contributed to the wrongful removal of my child from my home,

this letter places you formally on notice that such conduct is being documented, will not be tolerated, and may give rise to civil and/or criminal claims, including but not limited to defamation, civil conspiracy, aiding and abetting, and interference with parental rights.

---

## 2. IMPROPER INVOLVEMENT IN MY PRIVATE LIFE AND RESULTING HARM TO MY CHILDREN

I believe that:

- You involved yourselves in my private life



---

Whatever your personal views of me may be, they did not justify:

- Turning my name and my private life into a recurring topic of coordinated discussion within your family and social circles;
- Using those discussions to build or reinforce a narrative framework that cast me as a threat; or
- Supporting or enabling actions that escalated from gossip and characterization into real-world consequences for my children and me.

I believe that:

- Your involvement contributed directly or indirectly to a “witch hunt” dynamic in which I was treated as a problem to be removed, rather than as a parent with rights and a family to protect; and
- That dynamic was then used to justify or rationalize extreme measures, including the wrongful removal of my child and ongoing interference with my parental rights.

ongoing interference with my parental rights.



### 3. IMPACT ON MY CHILDREN, CUSTODY, AND RETALIATION FOR CHILD-SAFETY REPORTS

By this letter, I am making clear that:

- You had no authority or legitimate interest in turning my private life into a basis for action against me or my children; and
- Any further attempts to frame, monitor, or target me—whether through direct action, behind-the-scenes involvement, or use of your networks—will be treated as intentional interference with my family, intentional infliction of emotional distress, and interference with my parental rights.

unstable, or dangerous.



With respect to you specifically, Ms. Manziel Malechek, I believe that:

- Approximately two years ago, my only direct contact with you was at Johnny Manziel's request;
- Outside of that, I did not repeatedly contact you, nor did I tag or target you on social media;
- I did, however, report your public posting of photographs of your daughters that I viewed as indecent or unsafe, particularly given the heightened male attention and public scrutiny attached to your family because of who their uncle is.

I believe that:

- Members of the Adam family and individuals aligned with you have played a role in spreading or reinforcing narratives that contributed to my child being fraudulently and wrongfully removed from my home;
- These narratives included attacks on my mental health and insinuations that my visibility, or my history, made me unfit, unstable, or dangerous.

I believe that:

- Rather than treating that report as a legitimate concern for your children's safety, you chose to respond with retaliation;
- That retaliation included participating in or supporting efforts that contributed to my own children being unlawfully and unjustly prired from their home;
- In effect, a mother who raised concerns about the exposure of your children to the world became the target of a coordinated effort that profoundly harmed her own.

I do not and will not view children—mine, yours, or anyone else's—as pawns in a reputational or institutional dispute. Any further use of my children as leverage, collateral, or a vehicle for retaliation will be treated as egregious interference with parental rights, and as conduct warranting the fullest possible civil and criminal scrutiny.

---

#### **4. COERCION, MANUFACTURED STATEMENTS, AND MISUSE OF SOCIAL/MEDIA NARRATIVES**

I am aware, and believe, that:

- Coercion, contractual pressure, and reputational leverage have been used on people around me—including family members, friends, and even Johnny Manziel—to induce or pressure them to say things they do not personally believe, for the singular purpose of discrediting me;
- In the current technological and media environment, social-media posts, edited video, audio clips, and scripted appearances can be manufactured, manipulated, or contractually compelled in ways that do not reflect a person’s true beliefs or free will.

---

By contrast:

- I have sent formal preemptive notices to multiple business entities and affiliations connected to Mr. Manziel—entities I have never contacted in my life other than to provide such notice—making clear that if they continue to pressure him to make defamatory statements about me, I will treat their conduct, and the documentary trail surrounding it, as evidence that I am being targeted and discredited, not that I am “stalking” him;
- The same principle applies to you: my limited, historic contact with you stands in direct contrast to the extent of the narratives you have helped shape.

Accordingly, and for the record:

- I do not treat anything posted on social media, or any public comment attributed to Johnny Manziel that is not directed to me in a formal legal communication, as a legitimate legal allegation that I have “stalked” him;
- To date, Johnny Manziel has not served me with any legal notice accusing me of stalking or directing me to cease speaking about our history;
- He has not, through legal counsel or formal process, instructed me to stop speaking about him.

---

#### **5. USE OF DONALD J. ADAM—TIED CONTACTS AND NETWORKS**

On February 18, 2026, I issued a separate Preemptive Cease & Desist to Donald J. “Don” Adam, addressing:

- Abuse of local influence;
- CPS/child-agency interference;
- Texas A&M–related coordination; and
- Interference with my family.

By this letter, I expressly incorporate that notice by reference and state the following:

- I believe that each of you has leveraged, or attempted to leverage, contacts and networks tied to Mr. Adam's business, financial, social, and institutional positions to influence how I am spoken about in public and private;
- I believe that you have used those networks, directly or indirectly, to assist in the dissemination of narratives and content designed to discredit me, portray me as mentally unstable or as a "stalker," and justify extreme actions taken against my family.

Any actions you have taken, or may take, in coordination with Mr. Adam, his businesses, his club, or his institutional networks in relation to me or my children will be treated as acting in concert with him. You may be named alongside him and/or his entities in any future civil or criminal actions, where appropriate.

## 7. NON-RETALIATION AS TO JOHNNY MANZIEL

For the avoidance of doubt:

- This notice is issued by me, in my own name, based on my own experiences, beliefs, and documentation;
- Johnny Manziel did not ask me to send this notice, did not direct me to send this notice, and is not responsible for its contents.

You are expressly instructed that:

- You are not to use the existence or content of this notice as a pretext or vehicle to retaliate against, pressure, or further manipulate Johnny Manziel in any way;
- You are not to cite this letter, or my actions in sending it, as justification to demand public statements from him, to coerce him into disavowing me, or to further any defamatory or harmful narrative about me under the guise of "responding" to this correspondence.

Any attempt to use this notice as a retaliatory tool against him will be treated as additional evidence of coordinated manipulation, coercion, and bad faith.

If you fail to provide these assurances, or if you continue any of the conduct described above, I will consider all available civil and criminal remedies against you and any individuals or entities acting in concert with you, without further notice.

Sincerely,

MaKenzie Calame

## 8. REQUIRED ASSURANCES

Within forty-eight (48) hours of receipt of this letter, I request written confirmation from each of you that:

1. You will not participate in, direct, or encourage any further actions involving my children, my parental rights, or my private life;
2. You will refrain from repeating, endorsing, or amplifying any narrative that depicts me as mentally unstable, dangerous, or as a "stalker";
3. You will not use any contacts or relationships tied to Mr. Adam or his business, social, or institutional networks to influence what is said about me or to assist in efforts to discredit me; and
4. You will not use this notice as a pretext to retaliate against, pressure, or otherwise target Johnny Manziel.

PREEMPTIVE CEASE & DESIST –  
FENWAY SPORTS GROUP,  
SPORTS-BETTING-ADJACENT  
INTERESTS, NCAA / NIL /  
GAME-NARRATIVE  
ECOSYSTEM, AND ANY USE OF  
MY NAME, MY CHILDREN, OR  
MANUFACTURED “STALKER”  
NARRATIVES Inbox



 me Feb 19  
to media, info, redsoxfoun...   

MaKenzie Calame  
1311 McQueeney Drive  
College Station, TX 77845  
Phone: 903.388.2806  
Email: [makenzie.calame13@gmail.com](mailto:makenzie.calame13@gmail.com)

February 19, 2026

To:  
Fenway Sports Group Holdings, LLC  
Attn: John W. Henry, Tom Werner, Mike Gordon  
82 Brookline Avenue  
Boston, MA 02215

And to the personal and affiliated business interests of:

- John W. Henry (including but not limited to: Boston Red Sox-related interests, Boston Globe Media / The Boston Globe, and any personal investment vehicles)
- Tom Werner
- Michael S. Gordon
- LeBron James, Maverick Carter, RedBird Capital Partners, Arctos Partners, and any

### 3. MANUFACTURED "STALKER" NARRATIVE – PREEMPTIVE BOUNDARIES

I believe that:

- The "stalker" storyline attached to my name has been manufactured, built on manipulated media, deepfakes, mischaracterized clips, and selective framing of my long-term relationship with Johnny Manziel;
- This narrative has been operationalized by media, podcasts, and content platforms with ties to professional sports and betting ecosystems;
- It is designed to:
  - Discredit my work on election integrity, NIL fairness, and game rigging;
  - Recast me from long-term partner into "problem fan";
  - Provide cover for institutions, sponsors, and owners with reputational and financial exposure.

- It is designed to:
  - Discredit my work on election integrity, NIL fairness, and game rigging;
  - Recast me from long-term partner into "problem fan";
  - Provide cover for institutions, sponsors, and owners with reputational and financial exposure.

By this letter, I am clearly stating:

- Fenway Sports Group and all people under its branding may not participate in, echo, or expand that narrative about me.
- Any FSG-linked podcast appearance, documentary, or "offhand" media comment about "the Johnny Manziel stalker" that can be traced back to your athletes, your media assets, or your partners will be treated as actionable defamation and intentional infliction of emotional distress—particularly where it impacts my children.

---

## 7. CLARIFICATION REGARDING JOHNNY MANZIEL & CONTRACTS / NON-RETALIATION

For the record:

- Johnny Manziel did not ask me to write or send this notice.
- I do not have access to, nor am I privy to, the specific terms of any past, present, or future contracts between Johnny Manziel and Fenway Sports Group or any FSG-affiliated entity.
- This letter is sent solely on my own behalf and on behalf of my children, to protect our rights, reputations, and safety.

---

Accordingly:

- No retaliation, pressure, or coercion is to be directed at Johnny Manziel, his career, his contractual relationships, or his livelihood as a result of my asserting my own legal rights.
- You are not permitted to use this notice as a pretext to punish him, freeze him out of opportunities, or force him to make public statements about me that he does not choose freely, without contractual or financial coercion.
- Any effort to compel him—via contract, sponsor pressure, or internal leverage—to issue or repeat defamatory statements about me in response to this notice will be treated as:
  - A continuation of the manufactured “stalker” narrative; and
  - Evidence of coordinated defamation and interference with my rights by entities under your control.

My assertion of my own rights does not grant you license to use Johnny Manziel as a shield, proxy, or weapon against me.

## 8. REQUIRED ASSURANCES

Within forty-eight (48) hours of receipt of this letter, I request written confirmation that:

1. Fenway Sports Group has implemented an internal legal hold covering any present or contemplated use of my name, image, likeness, or children in connection with FSG teams, media, or marketing;
2. FSG will not permit its athletes, on-air talent, or content partners to publicly label me a "stalker," "crazy fan," or similar defamatory term in connection with Johnny Manziel;
3. FSG will not allow its platforms—teams, media outlets, digital channels, or partner content—to be used as a vehicle for retaliation against me for my election-audit, NIL, or game-integrity work;
4. FSG will not permit any FSG-branded personality to speak on my mental health, my parental fitness, my children, or my relationship with Johnny Manziel in any capacity, on any platform, in any format;
5. FSG will not retaliate against Johnny Manziel, or attempt to compel statements

CAUSE NO. 26-000495-CV-472

JOHNNY MANZIEL v

*Plaintiff*

MAKENZIE CARTER aka

MAKENZIE CALAME

*Defendant*

**Exhibit C:**

Screenshots of Instagram messages between the defendant and @johnnymoneybar (along with other branded accounts), showing unsolicited outreach and the defendant's dismissive responses.

### 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.

Envelope ID: 112034106

Filing Code Description: DEFENDANT'S ORIGINAL ANSWER

Filing Description: AND RESPONSE TO PLAINTIFF'S FIRST AMENDED PETITION AND APPLICATION FOR TEMPORARY INJUNCTION

Status as of 3/5/2026 10:55 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Cameron Reynolds	791515	cam@jamesandreynolds.com	3/5/2026 10:24:30 AM	SENT
Aron Hutchins		aron@holthutchins.com	3/5/2026 10:24:30 AM	SENT
Padon Holt		padon@holthutchins.com	3/5/2026 10:24:30 AM	SENT
Englesh Rhodes		englesh@holthutchins.com	3/5/2026 10:24:30 AM	SENT
Cole Bourgeois		cole@holthutchins.com	3/5/2026 10:24:30 AM	SENT