

IN THE CIRCUIT COURT OF THE
EIGHTEENTH JUDICIAL CIRCUIT
BREVARD COUNTY, FLORIDA
CASE NO.: 05-2024-DR-052505

THOMAS HUDSON,
Petitioner,

and

SHAUNTEL HUDSON,
Respondent.

_____ /

**PETITIONER'S RENEWED EMERGENCY MOTION FOR
CONTEMPT AND ENFORCEMENT**

COMES NOW, the Petitioner in the above-styled cause, THOMAS HUDSON, by and through its undersigned attorney, hereby gives notice of filing the Petitioner's Renewed Emergency Motion for Contempt and Enforcement and states as follows:

1. The Petitioner has not had any meaningful contact with his children TH and BH due to the actions of the Respondent for over 1 and 1/2 years, with the very limited exception in which the Respondent allowed Petitioner to see BH for 12 hours on Thanksgiving, the week before the December 5, 2025, hearing.
2. The Petitioner has court ordered parenting time with TH and BH.
3. The Respondent is intentionally violating the orders of the Court by withholding BH from the father.
4. The initial Emergency Petition for Contempt and Enforcement was filed with this Court over 1 year ago.
5. From November 2 through the 8 the Respondent, without the consent of the Petitioner, took TH and BH on a cruise in international waters.
6. On the cruise ship TH and BH were under the exclusive supervision and responsibility of the Respondent.
7. During the cruise the Respondent failed to properly supervise TH and also allowed TH and her husband's 18-year-old daughter to share a room together.
8. The 18-year-old daughter was found asphyxiated under the bed in the room which she shared with TH.

9. The actions of the unsupervised TH are currently under investigation of the Federal Bureau of Investigations.
10. In addition to failing to properly supervise TH and BH, the Respondent has intentionally alienated both TH and BH from the Petitioner.
11. The Petitioner offers the following statement of facts gathered directly from text messages and emails from the Respondent evidencing the Respondent's continued attempts to alienate the Petitioner from his children as well as negatively impacting the best interests of the children.
12. **8/4/24** –Respondent requested Petitioner's input regarding school supplies and clothes for BH and TH, although Petitioner is already paying full child support for both. Petitioner already purchased school supplies and clothes for AH who resides with Petitioner and told Respondent he would try to help with supplies for BH and TH. Petitioner requested that Respondent encourage BH and TH to text Petitioner. Respondent replied that she would. Petitioner requested that Respondent tell BH and TH that he loves them.
13. **8/23/24** – Respondent provided her address and informed Petitioner that Petitioner that he and his family are not welcome at her home. Petitioner stated that he had not had any contact with the children and expressed displeasure with Respondent's constant moving addresses. Petitioner requested to see BH and TH at a park so the children could see each other. Petitioner offered to have a police officer present to alleviate any concerns.
14. **8/26/24** – Petitioner requested an update regarding getting the children together to see each other and requested that BH and TH contact him.
15. **8/28/24** – Respondent provided meeting location so the children could see each other. Meeting was scheduled for 8/31/25 at 8 AM. Petitioner and Respondent agreed to stay in their cars and allow the children to meet without other family members or the Respondent's boyfriend present.
16. **8/31/24** – Successful meeting between AH, BH and TH.
17. **9/1/24** – Petitioner thanked Respondent for successful meeting and requested to schedule another one soonest.
18. **9/14/24** – Petitioner requested that Respondent allow the children to meet again at the park on 9/15/24. Respondent declined due to having church on 9/15/24 and said that AH could go to Aquatic with BH, TH and Respondent's boyfriend the following weekend. Petitioner reminded Respondent that AH is not comfortable being around Respondent or Respondent's boyfriend and requested that the children be allowed to get together in a less

crowded setting. Multiple additional communications between Petitioner and Respondent regarding lack of communication between the children and both parents, TH's lack of cell phone access/being grounded from his cell phone, AH's math grade, and the involvement or lack thereof of Respondent's boyfriend. Petitioner reiterated his goal of being able to see all his children again and that getting the children together to see each other is the start of that.

19. **9/16/24** – Petitioner requested a new date to get the children together again.
20. **9/24/24** – Petitioner's inquiries regarding lack of contact with TH and request to see TH for his upcoming birthday.
21. **9/27/24** – Petitioner's follow up communications regarding getting together with TH and BH and speaking with BH on the phone.
22. **10/3/24** – Request from Petitioner that Respondent tell him what needs to happen so he can see TH and BH, and Respondent responded that "the kids have to be ready has nothing to do with me they have to be comfortable I've told you this over and over." Petitioner requested an in-person meeting with Petitioner, Respondent and all three children so everyone can feel comfortable and get the same information at the same time.
23. **10/15/24** – Petitioner requested to meet Saturday for the boys' birthdays, but Respondent had other plans for that weekend. Respondent stated she had planned to meet with Petitioner the prior weekend but since she did not hear from him, she assumed he was working.
24. **10/18/25** – Petitioner travelled to Titusville to watch TH's soccer game that was scheduled for 11 AM, but the game was over, as the start time had been changed to 9 AM. Respondent did not notify the Petitioner of any changes to the original schedule she had provided earlier in the school year.
25. **12/5/24 through 12/9/24** – Petitioner sent repeated messages to Respondent regarding speaking to and/or seeing BH for her birthday.
26. **12/11/24** – Petitioner requested therapy reports/files on BH and TH directly from therapists.
27. **1/18/25** – Petitioner requested that Respondent have TH or BH call him.
28. **4/15-16/25** – Respondent informed Petitioner that TH and BH would like to participate in therapy with Petitioner prior to any direct communications with him.

29. **4/18/25** – Respondent’s message to Petitioner refusing to engage in back and forth and directing him to her lawyer.
30. **4/28/25** – Notification of TH’s award provided to Petitioner. Petitioner requested to allow children to meet up at AH’s request. Respondent said that AH should reach out to her directly to arrange a meeting, and that Petitioner was not allowed to be present, as TH and BH had allegedly stated they did not wish the Petitioner to be present. Petitioner stated that AH would prefer to have Petitioner in the area, and Petitioner agreed to stay in the car.
31. **4/29/25** – Respondent continues to state that TH and BH do not wish to participate in a proposed meeting with AH and Respondent is respecting their wishes. Respondent notified Petitioner about TH’s dental visits and requested doctor and dentist information for AH. Petitioner provided AH’s requested information and asked that Respondent provide AH’s share of child support to Petitioner, since AH has been living with him and not with the Respondent for over a year. Respondent told petitioner to request an adjustment of child support through the courts if he felt an adjustment was warranted. Both sides are to upload dentist and doctor receipts and pay their respective portions.
32. **5/6/25** – Respondent notified Petitioner of a family trip planned from 11/2/25-11/8/25, consisting of a cruise from Miami to Jamaica, Grand Cayman, and Cozumel and back to Miami, and requesting Petitioner’s address so she can send him passport forms.
33. **5/29/25** – Respondent’s follow up request that Petitioner sign passport forms for the children. Respondent also provided BH and TH’s report cards. Petitioner declined to sign the forms and stated that he was not consenting (comfortable) with the children leaving the country, and until they can find common ground regarding custody and visitation, Petitioner was not comfortable with them even leaving the state.
34. **6/3/25** – Respondent’s notice to Petitioner of BH’s recital with no date or location information.
35. **6/14/25** – Petitioner requested information regarding Father’s Day and summer parenting time with BH and TH.
36. **6/14-15/25** – Respondent reiterated her positions regarding the need for therapeutic involvement in any meeting between Petitioner and BH and TH; that she supports and encourages therapeutic involvement; that Petitioner’s behavior regarding contacting the children is not appropriate and does not support their emotional well-being; and instructed Petitioner not to discuss legal matter with the children. Petitioner responded that he is willing to participate in therapy; he will continue to tell his children the truth about what is going on with the court case when they have not been told the truth by the respondent; and Petitioner clarified the circumstances regarding AH’s meeting with BH.

37. **7/22/25** – Petitioner requested to be allowed to speak with BH because he does not believe TH has shared his (Petitioner's) communications with BH. Respondent responded that BH has not requested to speak with Petitioner, and she will not force her. Respondent claims she encourages both children to speak with Petitioner at least once or twice per week, but they both allegedly continue to express that they'd prefer to start with therapy.
38. **7/7/25** – Respondent requested that Petitioner not utilize the kids to pass along messages. Petitioner provided his new physical address and requested BH's cell phone number. Petitioner replied that BH and TH share a cell phone.
39. **8/5/25** – Petitioner asked Respondent when he would be able to see or talk to BH and TH.
40. **8/15/25** - Petitioner reached out to Respondent to speak to BH and TH and get an update on their well-being. Petitioner noted that the messages he has been sending to BH and TH are not being opened. He requested that the Respondent tell BH and TH that he loves them and misses them and that he would like to see them if even just for a minute. Respondent did not respond.
41. **8/26/25** – Respondent informed Petitioner that TH and BH had started school, BH started dance, and TH started soccer. Respondent said she would share soccer game information. Respondent also provided medical information on BH and TH, and informed Petitioner that she would be getting an orthodontic consult for BH.
42. **8/28/25** - Petitioner reached out to Respondent to speak to BH and TH and get an update on their well-being. He requested that the Respondent tell BH and TH that he loves them and that he hopes to see them or speak to them soon. Respondent did not respond.
43. **9/8/25** – Petitioner reached out to Respondent to speak to BH and TH and get an update on their well-being. No response provided.
44. **11/8/25** – Emergency request from Respondent to have Petitioner call her. Petitioner called and was informed by Respondent notified Petitioner of the death of Respondent's boyfriend's 18 year old daughter on a Carnival cruise that the Respondent had taken with TH, Respondent's boyfriend and his children, among others. TH was being questioned regarding the death. Petitioner requested to be allowed to extricate BH from the situation. Respondent appreciated the offer but did not allow Petitioner to pick up BH.
45. **11/13/25** –Petitioner immediately requested to speak with BH but was told by Respondent that BH did not want to speak with Petitioner. Respondent refused to put Petitioner in contact with BH.

46. **11/14/25** – Petitioner requested that since TH was no longer residing with Respondent, that Respondent agree to put TH’s child support monies toward attorney’s fees for TH.
47. **11/18/25** – Petitioner requested to speak with BH to check on her well-being, but Respondent again refused to facilitate that communication stating that BH “does not want to talk.”
48. **11/20/25** – Petitioner informed Respondent that he would be at the Racetrack gas station in Titusville at 6 PM on 11/21/25 and requested confirmation that Respondent would be there with BH. Parties later agreed to meet at a fire station in Oakland, FL.
49. **11/21/25** – Petitioner drove to the fire station in Oakland, FL as scheduled, but Respondent’s boyfriend and the boyfriend’s parents interfered with the exchange. The Respondent stayed in her vehicle with BH and appeared visibly shaken and did not help facilitate the transfer. After additional verbal altercations with Respondent’s boyfriend and his parents, the Respondent failed to produce BH, and the Petitioner was denied his parental time with BH. There were multiple follow up communications between Respondent and Petitioner regarding BH’s condition, Respondent’s refusal to do anything to facilitate the transfer of BH to the Petitioner, the involvement of other parties in the exchange, etc.
50. **11/27/25** – Petitioner was allowed to pick up BH at 7:30 AM so that she could spend Thanksgiving with the Petitioner and his family. Extremely positive visit with Petitioner and his extended family. Petitioner returned BH to the Respondent as scheduled at 8 PM.
51. In addition to the facts cited above, the Petitioner intends to offer additional evidence of the Respondent’s parenting decisions that have negatively impacted the best interests of the children at the December 5th, 2025, hearing.

WHEREFORE, the Petitioner requests that the Court enter an order:

1. Finding the Respondent in Contempt of Court.
 2. Enforcing the Petitioner’s parenting time as set out in the parenting plan.
 3. Modifying the parenting time with the two younger children due to the mother’s refusal to follow the parenting plan.
 4. Awarding the father additional parenting time based upon the denial of parenting time.
 5. Requiring that the parties cooperate with appropriate services for the minor children.
- And,

6. Awarding the Petitioner attorney's fees and costs to be paid by the Respondent.

RESPECTFULLY SUBMITTED this 4th day of December, 2025.

_____/s/ Scott Timothy Smith_____
SCOTT TIMOTHY SMITH, ESQUIRE
Attorney for Petitioner
101 E. Fort Dade Ave.
Brooksville, FL 34601
(352) 796-7434
Florida Bar #: 0009695
ScottTSmithPA@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above was delivered to Millicent B. Athanason, Esq.: *Millya@aol.com, millysparalegal@gmail.com, aathanason19@gmail.com* via e-service delivery on this 4th day of December, 2025.

_____/s/ Scott Timothy Smith_____
SCOTT TIMOTHY SMITH, ESQUIRE