

**CAUSE NO. DC-25-10952**

<b>MICHAEL A. STUART</b>	§ IN THE DISTRICT COURT
Plaintiff	§
v.	§ 101ST JUDICIAL DISTRICT
<b>BROOKFIELD PROPERTIES, et al.</b>	§ DALLAS COUNTY, TEXAS
Defendant	§

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**PLAINTIFF'S SUPPLEMENT TO MOTION TO APPOINT FORENSIC ACCOUNTANT  
TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW Plaintiff, Michael A. Stuart, proceeding *pro se*, and files this Supplement to the *Motion to Appoint Forensic Accountant* originally filed on July 29, 2025. Since that filing, new evidence obtained through discovery confirms that Defendant's accounting records are contradictory and manipulated, making a forensic audit necessary to resolve this dispute.

**I. NEW EVIDENCE REQUIRES EXPERT REVIEW**

When Plaintiff filed the original Motion, he alleged that Defendant manipulated the ledger to fabricate a debt. Discovery has now confirmed this allegation with Defendant's own admissions:

**1. Defendant Admitted the Credit Existed:** In response to Interrogatory No. 3, Defendant Brookfield admitted that a credit balance of **\$1,312** existed on the Plaintiff's account in January 2025.

**2. The Math is Impossible Without Manipulation:** Defendant claims they removed this 1,312*credit due to a "system error. However, the new debt they are demanding is 2,475.*

- There is a mathematical gap of over \$1,100 between the "removed credit" and the "new debt."
- Plaintiff alleges this difference consists of **backdated late fees and parking charges** applied retroactively to closed accounting periods.

- Only a forensic accountant can trace the origin of these specific line items to determine if they were created retroactively in violation of Generally Accepted Accounting Principles (GAAP).

**3. Manual Deletion vs. "System Error":** While Defendant claim the ledger changes were due to an automated "system error" or migration, the **BILT Audit Logs** obtained by Plaintiff show that the credit was **manually reversed** on or about July 24, 2025. A forensic expert is required to examine the native metadata of these logs to determine if this was a computer glitch or an intentional human act of retaliation.

## **II. THE DENIAL OF SUMMARY JUDGMENT CONFIRMS THE NEED FOR AN AUDIT**

On December 11, 2025, this Court denied Summary Judgment, ostensibly because there remains a genuine issue of material fact regarding the validity of the competing ledgers.

"Because Defendant exclusively control the accounting systems and metadata at issue, Plaintiff cannot prove or disprove fabrication without neutral expert access."

- Plaintiff has produced a ledger showing Good Standing (confirmed by the June 2025 lease renewal).
- Defendant has produced a ledger showing a \$2,475 debt (created July 24, 2025).

The Court cannot determine which ledger is accurate based on "he said/she said" testimony. The truth resides in the **native database logs**. As noted in the original Motion, Plaintiff does not ask the Court to accept his personal reconstruction of the ledger (Exhibit A) as final. Instead, Plaintiff asks the Court to appoint a neutral forensic accountant to access the Defendant's raw system data.

## **III. PRAYER**

The cost of a forensic audit is justified because the integrity of federal housing funds (HUD-VASH) is at stake. Plaintiff prays that the Court grant the pending Motion and appoint a certified forensic accountant to audit the Defendant's billing records for the subject property from 2020 to present.

Respectfully submitted,

**/s/ Michael A. Stuart**

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**Certificate of Conference**

Plaintiff attempted to confer with counsel for Defendant by email regarding this motion but received no response as of the time of filing.

**/s/ Michael A. Stuart**

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**Certificate of Service**

I certify that a true and correct copy of the foregoing was served on all counsel of record through the eFileTexas system on December 16, 2025.

**/s/ Michael A. Stuart**