

II. CLAIM FOR RELIEF

3. Pursuant to Tex. R. Civ. P. 47(c)(5), Plaintiffs seek monetary relief over \$1,000,000.

III. PARTIES AND SERVICE

4. Plaintiffs, ES and JS, bring this suit as next friends of their son, JRS, a minor child (collectively “Plaintiffs”). Plaintiffs are individuals residing in Harris County, Texas. Pursuant to Tex. Civ Prac. & Rem. Code § 30.013, Plaintiffs will utilize confidential identities in all petitions, filings, and other documents presented to the Court. The identities of Plaintiffs will be disclosed to Defendants in accordance with the Texas Rules of Civil Procedure.

5. Defendant, Aramark Sports and Entertainment Services of Texas, LLC, (“Aramark”) is a Texas limited liability company with its principal office located at P.O. Box 7548, Philadelphia, PA 19101. Aramark may be served with process by serving its registered agent for service of process, CT Corporation System, at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. Aramark serves as the food, beverage, and housekeeping provider at NRG Stadium where the conduct underlying this suit occurred. At all relevant times, Aramark employed Defendant, Ushay Marquise Nixon, the individual who assaulted Plaintiff, JRS, a minor child.

6. Defendant, ASM Global Parent, Inc., (“ASM”) is a foreign corporation organized and existing under the laws of Delaware, whose principal office is located at 300 Conshohocken State Road, West Conshohocken, Pennsylvania 19428. ASM is registered to do business in Texas and may be served with process by serving its registered agent for service of process, Corporation Service Company d/b/a CSC – Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218. ASM is the manager and operator of NRG Park, which includes NRG Stadium.

7. Defendant, Ushay Marquise Nixon, (“Nixon”) is a citizen of Texas and an inmate at Harris County Jail Facility (JA09) located at 1200 Baker St., Houston, Texas 77002. Pursuant to Tex. Civ. Prac. & Rem. Code § 17.029(c), Nixon may be served with process by serving the employee at the facility designated to serve as an agent for service of civil process on inmates confined in the facility. Prior to his arrest, Nixon resided in Harris County at 21662 S. Werrington Way, Houston, Texas 77073.

8. Plaintiffs expressly invoke their right under Rule 28 of the Texas Rules of Civil Procedure to have the true name of any of the above Defendants substituted at a later time upon the motion of any party or of the Court.

IV. JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction over this lawsuit because the amount in controversy exceeds the minimum jurisdictional limits of this Court.

10. There is no basis for federal court jurisdiction over this matter, as Plaintiffs have not pleaded, nor do they intend to plead, any claim cognizable under federal law or any federal code, regulation, rule, statute, or otherwise. Moreover, this action may not be removed because Defendant Nixon is a citizen of Texas. 28 U.S.C. § 1441(b)(2).

11. Venue is proper in Harris County, Texas, under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code, as all or a substantial part of the events or omissions giving rise to the claims occurred in Harris County, Texas.

V. FACTUAL BACKGROUND

12. On or about December 14, 2025, JRS, an eight-year-old boy, attended a Houston Texans football game at NRG Stadium in Harris County, Texas, with his family. During the game, JRS was escorted by his mother, ES, to the men’s restroom located on Level 5 near Sections 550

and 549. While JRS went inside to use the men's restroom, his mother waited outside the entrance for him.

13. While in the restroom, JRS was approached by Defendant Nixon, an employee of Aramark, who was working as a sweeper assigned to Level 5 of NRG Stadium. Nixon instructed JRS to wash his hands and then directed him into a restroom stall. JRS followed these instructions because they came from an employee.

14. Once inside the stall, Nixon locked the door, removed JRS's pants and underwear, and exposed JRS's genitals. Nixon then instructed JRS to turn around and face the toilet, and JRS complied. JRS then looked behind him and saw Nixon undo his belt and drop his own pants. At that point, JRS told Nixon that he did not trust him, pushed past Nixon, and unlocked and exited the stall.

15. When JRS exited the men's restroom, his mother noticed he was adjusting his pants. As the two of them walked back towards their seats, ES was approached by a Good Samaritan who stated he observed an employee "helping" her son in the restroom and told her it "just didn't look right." When ES and JRS returned to their seats, ES asked her son if something happened in the restroom and JRS responded, "Yes, a man pulled my pants down."

16. When JS asked his son to point out the perpetrator as they left their seats and walked back toward the men's restroom, JRS pointed to Nixon. After seeing the young boy point him out, Nixon took off and hid in a maintenance closet located near the men's restroom on the same level. JS followed Nixon and waited outside the closet, along with stadium security, until police arrived and took Nixon into custody.

17. Video surveillance footage from the stadium, which was obtained and reviewed by the police, corroborates the above account of events.

18. Nixon was arrested and charged with Indecency with a Child and Attempted Aggravated Sexual Assault of a Child related to his assault of JRS. The criminal complaints related to these charges are attached hereto as **Exhibit A**. Nixon is currently an inmate at a Harris County Jail facility while he awaits his criminal trial.

19. Shockingly, Nixon had a criminal history of sexual misconduct prior to his employment with Aramark. Specifically:

- a. On January 11, 2022, Nixon was charged with **Indecency with a Child** in Harris County, Texas, for exposing his genitals to a minor.
- b. On June 19, 2022, Nixon was charged with **Indecent Assault** in Harris County, Texas, for touching the breast of a female without her consent.

The criminal complaints for the above charges are attached hereto as **Exhibit B**.

20. Additionally, public court records related to Nixon's prior criminal charges reflect that Nixon attended school online because of his persistent inappropriate behavior towards his female classmates. *See* attached **Exhibit C**.

21. Despite Nixon's criminal history, as well as his history of predatory behavior, Aramark hired him to work at NRG Stadium—a venue that hosts events attended by tens of thousands of people, including children. Aramark failed to conduct an adequate background check or otherwise ensure that Nixon was fit for employment in a position that placed him in close proximity to children.

22. Aramark's negligent hiring, training, and supervision of Nixon directly and proximately caused the sexual assault of JRS. As a result, JRS has suffered severe mental anguish, emotional distress, and psychological trauma.

VI. CAUSES OF ACTION

A. Count 1: Negligence Against Aramark

23. Plaintiffs incorporate the foregoing paragraphs as if fully set forth herein.
24. Aramark owed a duty to exercise reasonable care in hiring, training, and supervising its employees, particularly those working in a public venue like NRG Stadium.
25. Aramark breached this duty it owed to Plaintiffs by:
- a. Failing to adequately vet Nixon;
 - b. Failing to conduct a criminal background check on Nixon, or knowingly disregarding the results of his criminal background check;
 - c. Negligently hiring Nixon despite his criminal history of sexual misconduct and history of predatory behavior;
 - d. Failing to properly train and supervise Nixon;
 - e. Allowing Nixon to work in an environment where he had access to children; and
 - f. Failing to create a safe environment for patrons at NRG Stadium.
26. The breaches by Aramark proximately caused JRS's injuries and resulting damages, which were a foreseeable result of such negligence. But for Aramark's negligent acts/omissions as described above, JRS would not have been sexually assaulted by Nixon. It is foreseeable to an employer exercising ordinary care that negligently hiring an employee, who has a criminal history of sexual misconduct and predatory behavior, to work in a large, public venue with children in attendance, may result in crimes perpetrated on the premises and injuries to patrons, similar to JRS's injuries.

B. Count 2: Gross Negligence Against Aramark

27. Plaintiffs incorporate the foregoing paragraphs as if fully set forth herein.

28. Each and all of the foregoing negligent acts and omissions, taken singularly or in combination, constitute grossly negligent conduct on the part of Aramark in that such conduct, when viewed objectively from the standpoint of Aramark at the time of its occurrence, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others; and which Aramark had actual, or subjective awareness of the risk involved, but nevertheless, proceeded with conscious indifference to the rights, safety, and welfare of JRS.

29. Aramark's gross negligence was a proximate cause of JRS's injuries, and his injuries were the foreseeable result of such gross negligence.

30. Because Aramark's conduct amounts to gross negligence, Plaintiffs seek exemplary damages under Tex. Civ. Prac. & Rem. Code Ann. 41.001 *et seq.*

C. Count 3: Premises Liability Against Aramark and ASM

31. Aramark and ASM, as the venue management and service companies of NRG Stadium, had control over the premises and owed a duty to provide a safe environment for patrons, including JRS.

32. Aramark breached this duty by creating or allowing a dangerous condition to exist, namely, employing Nixon, who posed a foreseeable risk to children.

33. Aramark's breach of duty was a proximate cause of the injuries sustained by JRS.

D. Count 4: Assault and Battery Against Nixon

34. Plaintiffs incorporate the foregoing paragraphs as if fully set forth herein.

35. Nixon intentionally or knowingly caused harmful and offensive contact with JRS, a minor child, by removing his clothing and exposing his genitals.

36. Nixon's actions constitute assault and battery under Texas law.

37. Nixon's assault of JRS was a proximate cause of JRS's injuries.

38. Plaintiffs seek exemplary damages under Tex. Civ. Prac. & Rem. Code Ann. 41.001 *et seq.*, as Nixon acted with malice towards JRS.

E. Count 5: Negligence Per Se Against Nixon

39. Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

40. The following criminal statutes govern the conduct of Nixon:

- a. Indecency with a Child (Tex. Penal Code § 21.11(a)(2)(B)); and
- b. Attempted Aggravated Sexual Assault of a Child Under 14 Years of Age (Tex. Penal Code § 22.021(a)(1)(B) & (2)(B); Tex. Penal Code § 15.01).

41. Under the preceding statutes, JRS belongs to the class of persons that these statutes were designed to protect, and his injuries are the type that these statutes were designed to protect.

42. Nixon violated these statutes without a legal excuse.

43. Nixon's violations of the above statutes were a proximate cause of JRS's injuries, and his injuries were the foreseeable result of such negligence per se.

44. Plaintiffs seek exemplary damages under Tex. Civ. Prac. & Rem. Code Ann. 41.001 *et seq.*, as Nixon acted with malice towards JRS.

VII. DAMAGES

45. Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

46. As a direct and proximate result of Defendants' conduct, JRS has suffered and will continue to suffer:

- a. Past and future mental anguish; and
- b. Past and future medical expenses.

47. The sum of Plaintiffs' damages is within the jurisdictional limits of the Court.

VIII. INTEREST

48. Plaintiffs seek pre-judgment and post-judgment interest as authorized by law.

49. Plaintiffs also claim damages in the amount of legal interest as allowed by law on all pecuniary and non-pecuniary damages as found by the jury at the maximum legal rate allowed by law: (a) accruing from a date beginning 180 days after the date Defendants received written notice of this claim or on the date of filing suit, whichever occurred first, until the time judgment against the defendant is rendered and (b) after judgment until same is paid.

IX. JURY DEMAND

50. Plaintiffs demand a jury trial and have tendered the appropriate fee.


X. PRAYER

51. For these reasons, Plaintiffs ask that they be awarded a judgment against Defendants for the following:

- a. Actual damages;
- b. Exemplary damages;
- c. Pre-judgment and post-judgment interest;
- d. Court costs; and
- e. All other relief to which Plaintiffs are entitled.

Respectfully submitted,

BLIZZARD GREENBERG, PLLC



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ATTORNEYS FOR PLAINTIFF

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.

Edward Blizzard on behalf of Anna Greenberg
Bar No. 24089898
eblizzard@blizzardlaw.com
Envelope ID: 109946201
Filing Code Description: Petition
Filing Description: Plaintiffs' Original Petition
Status as of 1/12/2026 3:35 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jackie Piper		jpiper@blizzardlaw.com	1/12/2026 3:11:59 PM	NOT SENT
Anna Greenberg		agreenberg@blizzardlaw.com	1/12/2026 3:11:59 PM	NOT SENT
Edward Blizzard		eblizzard@blizzardlaw.com	1/12/2026 3:11:59 PM	NOT SENT

EXHIBIT A

P3

THE STATE OF TEXAS
VS.
USHAY MARQUISE NIXON
21662 S WERRINGTON WAY
HOUSTON TX 77073

SPN: 03126837
DOB: B M 11/23/2004
DATE PREPARED: 12/30/2025

D.A. LOG NUMBER: 3221430
CJIS TRACKING NO.:
AGENCY:HPD
O/R NO: 162928425
ARREST DATE: TO BE

FILED
Marilyn Burgess
District Clerk
DEC 30 2025
Time 11:37
By [Signature] Deputy

NCIC CODE: 3614 01

RELATED CASES: Same Def - 3221429

FELONY CHARGE: Indecency with a Child; Exposing Defendant's Anus or Genitals

CAUSE NO:
HARRIS COUNTY DISTRICT COURT NO:
FIRST SETTING DATE:

COURT ORDERED BAIL: TO BE SET
MAGISTRATION
PRIOR CAUSE NO:
CHARGE SEQ NUM: 1

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, **USHAY MARQUISE NIXON**, hereafter styled the Defendant, heretofore on or about **December 14, 2025**, did then and there unlawfully, with the intent to arouse and gratify the sexual desire of the Defendant, cause J.S., a child younger than seventeen years of age, to expose the genitals of J.S., by pulling down the Complainant's pants and underwear.

Probable Cause

Affiant M. Vollert, a certified peace officer with the Houston Police Department, assigned to the Special Victims Division, Crimes Against Children Unit, has reason to believe and does believe that Ushay Marquise Nixon (B/M - DOB: 11/23/2004) hereafter referred to as the Defendant, committed the act of Indecency with a Child by Exposure on December 14, 2025, at 1 NRG Parkway, a building located in Harris County, Texas .

Affiant bases his belief upon the following facts:

On December 14, 2025, around 1500 hours the Affiant was assigned to a call out case assignment 1629284-25. The Affiant learned around 1400 hours Houston Police Officer D. Perez was working a uniformed assignment at 1 NRG Parkway (NRG Stadium) when she was alerted to an attempted sexual assault of a child had just occurred inside a restroom at the location. The Affiant has verified that this location is inside Harris County.

The Affiant spoke to outcry witness E.S. who was identified as the mother of 8 year-old son J.S., hereafter styled the Complainant. The Affiant learned the following facts:

E.S. had attended the Texans vs Cardinals football game along with her 8-year-old son J.S., hereafter referred to as the Complainant, and her husband J.S.. E.S. stated that around 1400 hours she escorted the Complainant to the men's restroom located level 5 near Section 550 & 549. E.S. stated she observed the Complainant enter the restroom and waited outside until he exited the restroom. E.S. stated that she felt it was taking longer than usual for the Complainant to exit the restroom. E.S. stated when J.S. exited the restroom she noticed he as adjusting his pants. E.S. stated after she rounded the corner into the stairs leading to her seats an unknown Hispanic male approached and stated he observed an employee "helping" her son in the restroom and it "just didn't look right". E.S. was given the description of the employee as a "black guy wearing a purple shirt". E.S. stated she returned to their seats and asked the Complainant if something happened in the bathroom and the Complainant responded, "Yes, a man pulled my pants down".

The Affiant observed the Complainant's Forensic Interview which took place at the Childrens Assessment Center on December 19, 2025 with interviewer M. Huerta. The Affiant learned the following facts from the Complainant's forensic interview:

The Complainant was able to distinguish between a truth and a lie. The Complainant stated when he entered the men's restroom he first urinated in a urinal. The Complainant stated a black male in a purple shirt (the Defendant), who he identified as an employee, approached him, and instructed the Complainant to wash his hands. The Complainant stated after he washed his hands the Defendant told him to enter a restroom stall. The Complainant stated he followed these instructions because they were coming from an employee, so the Complainant and the Defendant entered the restroom stall located next to the sink. The Complainant stated once inside the stall Defendant told the Complainant to take off his hoodie. The Complainant responded that he wasn't wearing a shirt underneath his hoodie. The Complainant

stated the Defendant then locked the stall door and, using his hands, removed the Complainant's pants and the Complainant's underwear, which exposed the Complainant's penis. The Complainant stated the Defendant looked at the Complainant's face, body, and penis while he was exposed. The Complainant stated the Defendant instructed the Complainant to turn around which the Complainant did. The Complainant stated he was facing the toilet, with his pants down and penis exposed while the Defendant stood behind him. The Complainant looked behind him at the Defendant and observed the Defendant undoing his belt and drop his own pants, which exposed the Defendant's purple underwear. The Complainant stated that at this point he did not trust the Defendant, so he pushed the Defendant out of the way, unlocked the stall door, and exited the stall.

The Affiant spoke to J.S. and learned the following facts:

J.S. stated he was seated at their seats when E.S. and the Complainant returned from the restroom. J.S. stated that the Complainant made the outcry that the Defendant had pulled down his pants inside the restroom stall. J.S. stated he asked his son to point out the Defendant as they left their seats and returned to the general area on level 5 outside the men's restroom. J.S. stated his son pointed at a black male wearing a purple shirt, black pants, and green hat standing near the men's restroom. J.S. stated that after the Defendant observed the Complainant point at him, the Defendant walked quickly across the area and into a "closet" located near the men's restroom on the same level. J.S. stated that he waited outside the closet door until the police arrived and took the Defendant into custody. J.S. stated that the male he observed taken into custody by the police was the same individual the Complainant identified to him and who he witnessed entering the closet.

The Affiant reviewed (2) videos captured with security cameras at 8400 Kirby Drive (NRG Stadium) on December 14, 2025. Video 1 begins at 14:03:58 and shows a static capture of the general area outside Sections 550 & 549 along with the men and women's restrooms. At approximately 1 minute into the video the Complainant, E.S., and the Defendant are on screen. The Complainant is shown entering the restroom while E.S. waits outside. As the Complainant enters the restroom the Defendant is walking towards the Complainant and follows him into the restroom. At approximately 3:43 minutes into the video the Complainant is shown exiting the restroom and is adjusting his pants. The Complainant glances behind him towards the restroom exit before he and E.S. walk into Sections 550 & 549 exiting the camera frame. At approximately 6:17 minutes the Defendant is shown exiting the restroom and walking off frame towards the direction of Sections 551 & 552. At approximately 6:28 J.S. and the Complainant are shown entering the frame from the 550 stairs and the Complainant quickly points in the direction where the Defendant was last shown walking towards. The Affiant reviewed Video 2 which begins at 14:08:58 and shows a static capture of an area located at "First Aid", SW Stair 1, Elevator, and two unmarked doors. At approximately 1:41 minutes the Defendant is shown entering the bottom of the frame and walking towards the unmarked door located at the top of the frame. A few seconds later, J.S., E.S., and the Complainant enter the bottom of the frame, all pointing at the Defendant. The Defendant makes eye contact with them and proceeds to enter the closet and shuts the door. At approximately 10:00 minutes into the video the Defendant exits the closet and is detained by security officers along with HPD Officer D Perez. The Affiant observes the male suspect being detained from this closet is a black male wearing a purple polo shirt, black pants, green hat, transparent backpack, and dark rimmed glasses. The Affiant recognizes the suspect in the video as the Defendant Ushay Nixon who the Affiant interviewed at approximately 1700 hours later the same day.

The Affiant interviewed the Defendant at the CAC Adult Interview Room 1L15. The Defendant identified himself as Ushay Nixon (DOB: 11/23/2004 TXDL #45759443). The Affiant learned that the Defendant was working at NRG Stadium on that day cleaning restrooms and that he began his employment with Aramark at NRG Stadium last year. The Defendant stated he did encounter an 8-year-old boy inside the men's restroom earlier that day. The Defendant stated he asked the boy if the boy wanted to see the Defendant's Pokémon card collection on the Defendant's phone. The Defendant stated when he reached into his pocket to get his phone the boy got scared and ran away. The Defendant stated the boy thought the Defendant was going to "touch him" and that he "knew he was in trouble".

The Affiant spoke to Coralee Traurig who is a general manager of Aramark at NRG Stadium in Houston, Texas. The Affiant learned that Ms Traurig was working on December 14, 2025 when she was made aware of an incident on level 5 when she was informed by her command post that "an employee may have touched someone". Ms Traurig stated she responded to the location which is described as a general area of the stadium where she observed the Defendant detained by uniformed Houston Police Officers. Ms Traurig stated that she knows the Defendant as Ushay Nixon who has been an employee of Aramark for approximately 1 year and was assigned to Level 5 as a "sweeper" on December 14, 2025.

The Affiant obtained the Defendant's Texas DL #45759443 which displays his photo and date of birth (11/23/2004). The Affiant recognizes the adult male in TXDL #45759443 matching the individual who was interviewed in person on December 14 at the CAC and pictured in security videos 1&2 captured inside NRG Stadium on December 14, 2025. The Affiant verified on December 14, 2025 the Defendant was over the age of 17. The Affiant learned that the Complainant's birthdate places his age at 8 years old.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Signed and sworn by me on 12-30-25

[Handwritten Signature]

AFFIANT

Duly attested by me on 12/30/2025

[Handwritten Signature]

SBN24088813

Assistant District Attorney
Harris County District Attorney's Office
TBC No.

[Handwritten Signature]
Witness (Peace Officer)

T. Payne #578 DPO
Witness Printed name & Badge or Payroll number

COMPLAINT

Unofficial Copy Office of Marilyn Burgess District Clerk

P3

THE STATE OF TEXAS
 VS.
USHAY MARQUISE NIXON
21662 S WERRINGTON WAY
HOUSTON TX 77073

SPN: 03126837
 DOB: B M 11/23/2004
 DATE PREPARED: 12/30/2025

D.A. LOG NUMBER: 3221429
 CJIS TRACKING NO.:
 AGENCY:HPD
 O/R NO: 162928425
 ARREST DATE: TO BE

FILED
 Marilyn Burgess
 District Clerk
 DEC 30 2025
 Harris County, Texas
 Deputy

NCIC CODE: 1115 37 RELATED CASES: Same Def - 3221430
 FELONY CHARGE: ATT AGG SEX ASSLT CHILD <14

CAUSE NO:
 HARRIS COUNTY DISTRICT COURT NO:
 FIRST SETTING DATE:

COURT ORDERED BACK TO BE SET AT
 MAGISTRATION
 PRIOR CAUSE NO:
 CHARGE SEQ NUM: 1

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, **USHAY MARQUISE NIXON**, hereafter styled the Defendant, heretofore on or about **December 14, 2025**, did then and there unlawfully, intentionally, with the specific intent to commit the offense of Aggravated Sexual Assault of a Child of J.S., hereafter styled the Complainant, do an act, to-wit: by entering a bathroom stall with J.S. and exposing J.S.'s genitals by pulling down J.S.'s pants and underwear, which amounted to more than mere preparation that tended to but failed to effect the commission of the offense intended.

Probable Cause

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the Defendant entered the restroom stall located next to the sink. The Complainant stated once inside the stall Defendant told the Complainant to take off his hoodie. The Complainant responded that he wasn't wearing a shirt underneath his hoodie. The Complainant stated the Defendant then locked the stall door and, using his hands, removed the Complainant's pants and the Complainant's underwear, which exposed the Complainant's penis. The Complainant stated the Defendant looked at the Complainant's face, body, and penis while he was exposed. The Complainant stated the Defendant instructed the Complainant to turn around which the Complainant did. The Complainant stated he was facing the toilet, with his pants down and penis exposed while the Defendant stood behind him. The Complainant looked behind him at the Defendant and observed the Defendant undoing his belt and drop his own pants, which exposed the Defendant's purple underwear. The Complainant stated that at this point he did not trust the Defendant, so he pushed the Defendant out of the way, unlocked the stall door, and exited the stall.

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J.S. stated he was seated at their seats when E.S. and the Complainant returned from the restroom. J.S. stated that the Complainant made the outcry that the Defendant had pulled down his pants inside the restroom stall. J.S. stated he asked his son to point out the Defendant as they left their seats and returned to the general area on level 5 outside the men's restroom. J.S. stated his son pointed at a black male wearing a purple shirt, black pants, and green hat standing near the men's restroom. J.S. stated that after the Defendant observed the Complainant point at him, the Defendant walked quickly across the area and into a "closet" located near the men's restroom on the same level. J.S. stated that he waited outside the closet door until the police arrived and took the Defendant into custody. J.S. stated that the male he observed taken into custody by the police was the same individual the Complainant identified to him and who he witnessed entering the closet.

The Affiant reviewed (2) videos captured with security cameras at 8400 Kirby Drive (NRG Stadium) on December 14, 2025. Video 1 begins at 14:03:58 and shows a static capture of the general area outside Sections 550 & 549 along with the men and women's restrooms. At approximately 1 minute into the video the Complainant, E.S., and the Defendant are on screen. The Complainant is shown entering the restroom while E.S. waits outside. As the Complainant enters the restroom the Defendant is walking towards the Complainant and follows him into the restroom. At approximately 3:43 minutes into the video the Complainant is shown exiting the restroom and is adjusting his pants. The Complainant glances behind him towards the restroom exit before he and E.S. walk into Sections 550 & 549 exiting the camera frame. At approximately 6:17 minutes the Defendant is shown exiting the restroom and walking off frame towards the direction of Sections 551 & 552. At approximately 6:28 J.S. and the Complainant are shown entering the frame from the 550 stairs and the Complainant quickly points in the direction where the Defendant was last shown walking towards. The Affiant reviewed Video 2 which begins at 14:08:58 and shows a static capture of an area located at "First Aid", SW Stair 1, Elevator, and two unmarked doors. At approximately 1:41 minutes the Defendant is shown entering the bottom of the frame and walking towards the unmarked door located at the top of the frame. A few seconds later, J.S., E.S., and the Complainant enter the bottom of the frame, all pointing at the Defendant. The Defendant makes eye contact with them and proceeds to enter the closet and shuts the door. At approximately 10:00 minutes into the video the Defendant exits the closet and is detained by security officers along with HPD Officer D Perez. The Affiant observes the male suspect being detained from this closet is a black male wearing a purple polo shirt, black pants, green hat, transparent backpack, and dark rimmed glasses. The Affiant recognizes the suspect in the video as the Defendant Ushay Nixon who the Affiant interviewed at approximately 1700 hours later the same day.

The Affiant interviewed the Defendant at the CAC Adult Interview Room 1L15. The Defendant identified himself as Ushay Nixon (DOB: 11/23/2004 TXDL #45759443). The Affiant learned that the Defendant was working at NRG Stadium on that day cleaning restrooms and that he began his employment with Aramark at NRG Stadium last year. The Defendant stated he did encounter an 8-year-old boy inside the men's restroom earlier that day. The Defendant stated he asked the boy if the boy wanted to see the Defendant's Pokémon card collection on the Defendant's phone. The Defendant stated when he reached into his pocket to get his phone the boy got scared and ran away. The Defendant stated the boy thought the Defendant was going to "touch him" and that he "knew he was in trouble".

The Affiant spoke to Coralee Traurig who is a general manager of Aramark at NRG Stadium in Houston, Texas. The Affiant learned that Ms Traurig was working on December 14, 2025 when she was made aware of an incident on level 5 when she was informed by her command post that "an employee may have touched someone". Ms Traurig stated she responded to the location which is described as a general area of the stadium where she observed the Defendant detained by uniformed Houston Police Officers. Ms Traurig stated that she knows the Defendant as Ushay Nixon who has been an employee of Aramark for approximately 1 year and was assigned to Level 5 as a "sweeper" on December 14, 2025.

The Affiant obtained the Defendant's Texas DL #45759443 which displays his photo and date of birth (11/23/2004). The Affiant recognizes the adult male in TXDL #45759443 matching the individual who was interviewed in person on December 14 at the CAC and pictured in security videos 1&2 captured inside NRG Stadium on December 14, 2025. The Affiant verified on December 14, 2025 the Defendant was over the age of 17. The Affiant learned that the Complainant's birthdate places his age at 8 years old.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Signed and sworn by me on 12.30.25

[Signature]

AFFIANT

Duly attested by me on 12/30/2025

[Signature]

SBN24088813

Assistant District Attorney
Harris County District Attorney's Office
TBC No.

[Signature]

Witness (Peace Officer)

T. Payne #578 DPPD

Witness Printed name & Badge or Payroll number

COMPLAINT

Unofficial Copy Office of Marilyn Burgess District Clerk

EXHIBIT B

THE STATE OF TEXAS
VS.
USHAY MARQUISE NIXON
933 KOKOMO ST
HOUSTON TX 77015

SPN: 03126837
DOB: B M 11/23/2004
DATE PREPARED: 01/11/2022

D.A. LOG NUMBER: 2805943
CJIS TRACKING NO.: 9269360083A001
AGENCY:HPD
O/R NO: 004329322
ARREST DATE: 01/10/2022 09:12PM

NCIC CODE: 3614 01

RELATED CASES:

FELONY CHARGE: **Indecency with a Child; Exposing Defendant's Anus or Genitals**

CAUSE NO: 175442201010
HARRIS COUNTY DISTRICT COURT NO: 232
FIRST SETTING DATE: 1/12/2022

COURT ORDERED BAIL: \$2,500.00
PRIOR CAUSE NO:
CHARGE SEQ NUM: 1

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, **USHAY MARQUISE NIXON**, hereafter styled the Defendant, heretofore on or about **January 10, 2022**, did then and there unlawfully, with the intent to arouse and gratify the sexual desire of Ushay Marquise Nixon, expose the Defendant's genitals, knowing that J. L., a child younger than seventeen years of age was present.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Signed and sworn by me on 01/11/2022

Duly attested by me on 01/11/2022



Victoria Gonzalez
AFFIANT



Jim Leitner
Assistant District Attorney
Harris County District Attorney's Office
TBC No. 12187900
LEITNER_JIM@DAO.HCTX.NET

COMPLAINT

THE STATE OF TEXAS
VS.
USHAY MARQUISE NIXON
933 KOKOMO ST
HOUSTON TX 77015

SPN: 03126837
DOB: B M 11/23/2004
DATE PREPARED: 06/19/2022

D.A. LOG NUMBER: 2848946
CJIS TRACKING NO.: 9269752291A001
AGENCY:HPD
O/R NO: 080843122
ARREST DATE: 06/18/2022 03:52PM

NCIC CODE: 3623 04

RELATED CASES:

MISDEMEANOR CHARGE: **Indecent Assault**

CAUSE NO: 241214501010
HARRIS COUNTY CRIMINAL COURT AT LAW NO: 13
FIRST SETTING DATE: 6/24/2022

COURT ORDERED BAIL: Refer to (15.17)
PRIOR CAUSE NO:
CHARGE SEQ NUM: 1

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, **USHAY MARQUISE NIXON**, hereafter styled the Defendant, heretofore on or about **June 18, 2022**, did then and there unlawfully, touch the breast of G.G., hereinafter called the Complainant, without the consent of the Complainant, and with the intent to arouse or gratify the sexual desire of the Defendant.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Signed and sworn by me on 06/19/2022 _____

Duly attested by me on 06/19/2022 _____

Kandice Young

Ruth y. Burton

Kandice Young
AFFIANT

Yvonne Burton
Assistant District Attorney
Harris County District Attorney's Office
TBC No. 03479320
BURTON_YVONNE@DAO.HCTX.NET

Probable Cause found _____ . Capias to issue _____
Magistrate, Harris County, Texas

COMPLAINT

EXHIBIT C

THE STATE OF TEXAS
v.
NIXON, USHAY MARQUISE
Defendant
DOB: November 23, 2004

§ IN THE COUNTY CRIMINAL
§ COURT AT LAW NO. 13
§ HARRIS COUNTY, TEXAS

STATUTORY WARNINGS BY MAGISTRATE - PROBABLE CAUSE DETERMINATION – PR BOND/BAIL ORDER

Defendant is accused of a CLASS A MISDEMEANOR, namely, INDECENT ASSLT TOUCH COMPL

1. DEFENDANT NOT PRESENT

On this date and time the defendant was not present due to medical condition mental illness/IDD other OFF DOCKET PRESENTATION,

2. APPOINTMENT OF COUNSEL FOR ARTICLE 15.17 HEARING

- Defendant **was represented by** Assistant Public Defender (name) at the Article 15.17 hearing, **OR**
- Defendant **was represented by** (name) at the Article 15.17 hearing.

PROBABLE CAUSE FINDING AND ORDER

- The Court **FINDS** that probable cause for further detention **DOES NOT EXIST**. The Court **ORDERS** the law enforcement agency and officer having custody of Defendant to immediately release Defendant from custody.
- The Court **FINDS** that probable cause for further detention **EXISTS**. The Court reviewed and/or set Defendant’s bond as indicated in the BAIL ORDER below. The Court **ORDERS** Defendant committed to the custody of the Sheriff of Harris County, Texas, until Defendant posts the required bond or until further order of the Court.
- Probable cause was previously determined. The Court **ORDERS** Defendant committed to the custody of the Sheriff of Harris County, Texas, until Defendant posts the required bond or until further order of the Court.

SUMMARY OF BAIL HEARING

Having found that probable cause exists for the further detention of the Defendant, the Court next determined the conditions of release for Defendant to ensure that Defendant will appear and answer before the proper Court and to reasonably protect the safety of the community.

A. Evidence

- All information I considered in determining bail conditions, including criminal history, was provided to the defense prior to the hearing.

B. Indigence Determination and Ability to Pay:

- Defendant swore to and signed a Financial Affidavit stating that Defendant could afford \$0; **OR**
- Defendant did not swear to and sign a Financial Affidavit.
- I find by clear and convincing evidence that Defendant is indigent as defined by Section 17(h) of the O’Donnell Consent Decree and/or cannot afford any amount of secured bail; **OR**
- I find by clear and convincing evidence that Defendant is not indigent and can afford \$ at the time of this hearing without experiencing hardship in meeting the basic necessities of life.
- I cannot determine indigency and ability to pay because Defendant did not swear to and sign a financial affidavit, and Defendant was not present for the bail hearing.

C. Personal Bond / Bail Requests

District Attorney Request

- Personal Bond requested in the amount of \$ Opposed No Position
- Secured Bail requested in the amount of \$
- DA requested denial of bail
- DA made no bail request

Defendant's Request

- Personal Bond requested in the amount of \$ Opposed No Position
- Secured Bail requested in the amount of \$
- Defense made no bail request

BAIL ORDER

- Defendant is ordered RELEASED on a personal bond in the amount of \$100; **OR**
- The Court ORDERS Defendant committed to the custody of the Sheriff of Harris County, Texas,
 - bail was denied after a hearing; **OR**
 - until Defendant posts the required bond or until further order of the Court, **AND:**
 - Defendant must pay \$ secured bail to be released and I find that Defendant can afford the secured bail amount; **OR**
 - Defendant must pay \$ secured bail to be released. Defendant does not have the ability to pay the amount required, but I considered alternative conditions of release, and by clear and convincing evidence, there was no less-restrictive condition or combination of conditions that could reasonably prevent flight from prosecution and/or reasonably protect the safety of the community; **OR**
 - Defendant must pay \$ secured bail to be released. I did not have the required information to determine Defendant's indigency and ability to pay. I considered alternative conditions of release, and by clear and convincing evidence, there was no less-restrictive condition or combination of conditions that could reasonably prevent flight from prosecution and/or reasonably protect the safety of the community.

Reasons for the bail decision and evidence relied upon: [REDACTED]
 [REDACTED]
 [REDACTED] attends school online bc of persistent inappropriate behavior towards female classmates, [REDACTED]
 [REDACTED]

I certify that the procedures and findings required by Local Rule 9 were provided and that I have explained the reasons and evidence relied on for my decision to Defendant and/or counsel, orally, in writing, or both.

Pursuant to Texas Code of Criminal Procedure art 17.022 and Texas Government Code § 72.038, I hereby certify that in setting this bail that I considered each factor of Texas Code of Criminal Procedure art. 17.15(a), and I certify that I considered the information in the Public Safety Report System. I hereby authorize the Harris County District Clerk to enter the required certification in the Public Safety Report System on my behalf.

June 19, 2022 9:50 AM
 Date and Time

Lisa Porter 1676089

 Magistrate (Judge or Hearing Officer)

Interpreter (if applicable)

Magistrate Lisa Porter - Magistrate SPN 01676089