

**BEFORE THE BOARD OF DISCIPLINARY APPEALS
APPOINTED BY
THE SUPREME COURT OF TEXAS**



FILED
Mar. 13, 2019

THE BOARD of DISCIPLINARY APPEALS
Appointed by the Supreme Court of Texas

In The Matter Of	§	
	§	
Bilal Ahmed Khaleeq	§	Cause No. 60812
State Bar Card No. 24091271	§	
	§	

**RESPONDENT'S OBJECTION TO PETITIONER'S
MOTION FOR ENTRY OF JUDGMENT OF DISBARMENT**

TO THE HONORABLE BOARD:

Comes Now Respondent, Bilal Ahmed Khaleeq ("Respondent"), and files this his Objection To Petitioner's Motion For Entry Of Judgment Of Disbarment, and would show as follows:

1. Respondent agrees that Petitioner filed its Petition For Compulsory Discipline against him, seeking compulsory discipline based upon Respondent's conviction in Cause No. 3:17-CR-00359-N, wherein Respondent pled guilty to Conspiracy to Commit Marriage Fraud, in violation of 18 U.S.C 371 (8U.S.C. § 1325 (c)), and was committed to the custody of the Bureau of Prisons for a total term of six months, followed by supervised release for one year, together with an order of payment of a fine in the amount of \$10,000.

2. Respondent agrees that on 9 October, 2018, a Default Interlocutory Order of Suspension was entered by this Board, pending appeal of Respondent's conviction.

3. Respondent agrees that his appeal of this conviction was dismissed by the United States Court of Appeals for the Fifth Circuit, on or about 20 September, 2018, based upon Respondent's failure to prosecute the appeal, and that the conviction has now become final.

4. However, Respondent submits that a judgment of disbarment is not the appropriate compulsory discipline to be ordered herein. Respondent submits that the more appropriate compulsory discipline in this matter is a continuation of his interlocutory license suspension for the period of his one year mandatory supervision following his completion of his six months of confinement. Respondent submits that his conviction was not for a Serious or Intentional crime, as those terms have been defined by TRDP 1.06(T) and 1.06(AA) respectively. This Board should not determine that disbarment of Respondent is appropriate or justified under the facts and circumstances giving rise to Respondent's conviction.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondent prays that this Board enter its Order continuing the suspension of Respondent's license until his supervised release period of one year after release from custody has been completed. Respondent further prays that his privilege to resume the practice of law be restored at that time.

Respectfully Submitted,


ROBERT C. HINTON, JR.
Texas Bar No: 09710800

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CERTIFICATE OF SERVICE

I certify that on 12th day of March, 2019, a copy of Respondent's Objection To Petitioner's Motion For Entry Of Judgment Of Disbarment was served on Petitioner's counsel, Judith Gres De Berry, Assistant Disciplinary Counsel, Office of the Chief Disciplinary Counsel, State Bar of Texas, by email: jdeberry@texasbar.com.


ROBERT C. HINTON, JR.