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

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

**IN THE MATTER OF
THELMA M. ANDERSON,
STATE BAR CARD NO. 24091728**

CAUSE NO. 71154

**RESPONDENT'S SECOND MOTION TO ABATE COMPULSORY DISCIPLINE
PROCEEDINGS AND RESPONSE TO DISCIPLINARY COUNSEL'S ABATEMENT
POSITION VIA EMAIL**

I. INTRODUCTION

Respondent files this Consolidated and Revised Second Motion to Abate Compulsory Discipline Proceedings in response to Disciplinary Counsel's assertion that Part VIII of the Texas Rules of Disciplinary Procedure and the Board of Disciplinary Appeals' Internal Procedural Rules permit the disciplinary hearing to proceed notwithstanding an active criminal appeal.

That assertion is legally incorrect.

Neither **Part VIII nor BODA's Internal Procedural Rules** confer jurisdiction to impose or advance compulsory discipline predicated on a criminal judgment that is not final and is under direct appellate review for fundamental constitutional defects, including prosecutorial misconduct, ineffective assistance of counsel, conflicts of interest, and a targeted indictment obtained through perjured testimony.

Proceeding under these circumstances would violate due process, exceed BODA's jurisdiction, risk irreconcilable outcomes, and undermine the constitutional integrity of both proceedings.

II. STATEMENT OF FACTS

A. Procedural Background

1. Respondent is the subject of compulsory discipline proceedings premised solely on a criminal conviction that is currently on direct appeal. That appeal remains pending and unresolved, and it squarely challenges the validity of the indictment, conviction, and underlying proceedings.
2. Disciplinary Counsel has taken the position that, notwithstanding the pending appeal, the Board may proceed under Part VIII of the Texas Rules of Disciplinary Procedure and BODA's Internal Procedural Rules. Respondent disputes that position as a matter of law and constitutional authority.

B. Status of the Criminal Appeal

3. Respondent's criminal appeal raises substantial constitutional claims, including prosecutorial misconduct, ineffective assistance of counsel, conflicts of interest, and the use of perjured testimony to secure a targeted indictment.
4. These issues are not peripheral. They go to the heart of whether the indictment and resulting judgment are lawful, valid, or void. Until appellate review is complete, the criminal judgment lacks finality and remains subject to reversal, vacatur, or other relief.

C. Prosecutorial Misconduct and Perjured Testimony

5. The criminal case arose from allegations initiated and advanced by Respondent's former employer, a senior prosecutorial official, who knowingly provided false statements to investigators and the grand jury.
6. Respondent consistently identified this misconduct to defense counsel and maintained that the employer's involvement was retaliatory and unlawful. Despite repeated requests, discovery was not pursued in a manner that would have exposed the perjury and misconduct prior to the plea.

D. Ineffective Assistance of Counsel

7. Respondent's defense counsel failed to obtain and disclose critical discovery material, including Brady evidence, despite multiple written requests.
8. Respondent was pressured to resolve the criminal case without full knowledge of the evidence, the scope of prosecutorial misconduct, or the availability of viable defenses. These failures form an independent basis for appellate relief and are currently under review in separate grievance and malpractice proceedings.

E. Overlap Between the Criminal Appeal, Public Information Act Violations, and Disciplinary Proceedings

9. On March 7, 2025, Respondent submitted a Public Information Act request to the Dallas County District Attorney's Office seeking records related to Paul Hamilton, First Assistant District Attorney, and his involvement in submitting false statements to federal authorities.
10. Rather than comply, the Dallas County District Attorney's Office appealed the request to the Office of the Attorney General.
11. On May 23, 2025, the Office of the Attorney General issued a binding order requiring the Dallas County District Attorney's Office to produce all records related to Paul Hamilton's involvement in the false statements submitted to the FBI in August 2022, following the Texas Workforce Commission's determination that Respondent was wrongfully terminated.

12. The records at issue document retaliatory conduct by Mr. Hamilton, including knowingly false representations made to federal agents for the purpose of targeting Respondent and another prosecutor after both prevailed in unemployment benefits hearings.
13. Despite the Attorney General's order, the Dallas County District Attorney's Office has refused to produce the ordered records. As a direct result, Respondent has been deprived of documents critical to her criminal appeal, her pending grievances, and her ability to prepare an adequate defense in these disciplinary proceedings.
14. Because of the continued defiance of the Attorney General's order, Respondent was forced to file a writ of mandamus in the 193rd Judicial District Court of Dallas County **DC-25-20326** seeking to compel compliance. That matter was heard on December 4, 2025, and is currently under advisement, with a ruling pending.
15. The existence of a pending mandamus action underscores that Respondent does not yet possess all material evidence necessary to fully litigate either the criminal appeal, bar grievances that you all continue to reject or the disciplinary matter. The same documents being unlawfully withheld bear directly on whether the indictment was procured through perjury and retaliation by a government official.
16. The compulsory discipline proceedings are therefore proceeding not only on a non-final criminal judgment, but also in the absence of critical evidence that remains unlawfully criminally and civilly withheld by the prosecuting authority itself.
17. If the appellate court grants relief, or if the mandamus court orders production of the withheld records confirming perjury and misconduct, the factual and legal predicate for compulsory discipline will be eliminated or fundamentally altered.

III. GOVERNING LAW AND LEGAL FRAMEWORK

A. Compulsory Discipline Requires a Final, Valid Criminal Judgment

Part VIII of the Texas Rules of Disciplinary Procedure governs the procedure for compulsory discipline; it does not itself create authority to discipline based on a criminal matter whose legality is under active appellate review.

Texas courts have consistently held that a criminal judgment on direct appeal is not final for collateral or derivative purposes. A conviction that may be reversed, vacated, or declared void cannot serve as a stable predicate for compulsory discipline. See:

- **Ex parte Thomas, 953 S.W.2d 286, 289** (Tex. Crim. App. 1997) (a judgment under direct appeal lacks finality);
- **Scarborough v. State, 777 S.W.2d 83, 85** (Tex. Crim. App. 1989).

Where the criminal judgment is constitutionally contested and unresolved, compulsory discipline is premature and legally unsound.

B. Administrative Rules Cannot Supersede Constitutional Due Process

BODA's Internal Procedural Rules are administrative in nature and subordinate to:

- The Texas Constitution.
- The United States Constitution; and
- The Due Process Clause of the Fourteenth Amendment.

Texas law is unequivocal that administrative bodies may not proceed in a manner that undermines constitutional protections, even where internal procedures exist. *Texas State Bd. of Examiners v. Carpenter*, 252 S.W.2d 428, 430 (Tex. 1952).

Advancing discipline while Respondent challenges the lawfulness of the indictment itself forces Respondent to defend collateral consequences flowing from an allegedly unconstitutional criminal process. That result violates due process and exceeds administrative authority.

IV. ABATEMENT IS REQUIRED WHERE PARALLEL PROCEEDINGS TURN ON THE SAME OPERATIVE FACTS

A. Status of the Criminal Appeal

Respondent's criminal appeal raises substantial constitutional claims, including prosecutorial misconduct, ineffective assistance of counsel, conflicts of interest, and the use of perjured testimony. These claims go directly to the validity of the indictment and conviction that form the sole basis for compulsory discipline.

Until appellate review is complete, the criminal matter remains legally unresolved.

B. Overlapping Nucleus of Operative Facts

Texas law recognizes abatement as necessary where:

- Two proceedings arise from the same nucleus of operative facts; and
- Resolution of one directly impacts the legitimacy of the other.

Here, the disciplinary proceeding relies on the same indictment, evidence, and factual assertions currently under appellate scrutiny, including allegations of:

- Prosecutorial misconduct; • Ineffective assistance of counsel; • Conflicts of interest; and • A targeted indictment obtained through perjured testimony by a former employer.

If the appellate court grants relief, the foundation for compulsory discipline collapses as a matter of law.

V. BODA LACKS JURISDICTION TO ADJUDICATE ISSUES PENDING BEFORE AN APPELLATE COURT

An administrative tribunal may not render findings that effectively adjudicate matters pending before a higher court or preempt appellate review. *City of Houston v. Rhule*, 417 S.W.3d 440, 442 (Tex. 2013).

Proceeding at this stage would require BODA to:

- Accept as valid evidence alleged to be perjured;
- Rely on an indictment alleged to be unlawfully targeted and constitutionally defective; and
- Implicitly reject constitutional claims reserved exclusively for appellate determination.

Such action constitutes an impermissible collateral determination and exceeds BODA's jurisdiction.

VI. EQUITY AND FUNDAMENTAL FAIRNESS MANDATE ABATEMENT

Disciplinary proceedings are quasi-judicial in nature and must comport with fundamental fairness. *State Bar of Tex. v. Evans*, 774 S.W.2d 656, 658 (Tex. 1989).

Absent abatement, Respondent would be:

- Forced to litigate discipline while simultaneously challenging the legality of the criminal process.
- Compelled to take inconsistent legal positions.
- Subjected to irreparable reputational, professional, and constitutional harm.

Judicial economy, fairness, and constitutional integrity all weigh decisively in favor of abatement.

VII. RESPONSE TO DISCIPLINARY COUNSEL'S POSITION

Disciplinary Counsel's reliance on Part VIII of the Texas Rules of Disciplinary Procedure and BODA's Internal Procedural Rules is misplaced.

Those provisions:

- Govern procedure only;
- Do not negate the doctrine of abatement;
- Do not override constitutional supremacy;
- Do not authorize reliance on a potentially void or reversible criminal judgment.

Accordingly, the assertion that the disciplinary hearing must proceed notwithstanding an active appeal is legally erroneous.

VIII. JURISDICTIONAL DEFECTS AND FAILURE OF SERVICE

A. Lack of Personal Jurisdiction Due to Failure of Service

Personal jurisdiction never attached in this matter because the Commission for Lawyer Discipline failed to properly serve the Original Petition for Compulsory Discipline.

Under Texas law, proper service is a prerequisite to personal jurisdiction, and amended pleadings cannot cure a failure of service where jurisdiction never attached.

B. Subsequent Amended Petitions Do Not Cure Jurisdictional Defects

The First and Second Amended Petitions were filed despite the absence of valid service of the Original Petition. Texas courts consistently hold that an amended pleading presupposes existing jurisdiction and cannot retroactively establish jurisdiction where none existed.

C. Respondent Was Never Properly Served With the Operative Pleading

Respondent was never properly served with the operative petition upon which the compulsory discipline hearing is based. Informal delivery or email transmission does not constitute valid service under the Texas Rules of Civil Procedure.

D. Waiver Is Expressly Denied

Respondent expressly preserves all objections to personal jurisdiction and defective service. Any appearance made for the limited purpose of contesting jurisdiction, seeking abatement, or preserving constitutional error shall not be deemed a waiver or consent to jurisdiction.

E. EXHIBIT A – SERVICE TIMELINE

Petition	Filed	Claimed Service	Actual Service	Jurisdictional Effect
Original Petition	Filed	Address listed only	Not served	No jurisdiction
First Amended Petition	Filed	Address listed only	Not served	No jurisdiction
Second Amended Petition	Filed	Certified mail referenced	Service defective	No jurisdiction
Subsequent Notice	Filed	Email	Not received / invalid	No jurisdiction

IX. PRAYER

For these reasons, Respondent respectfully requests that the Board:

- 1. Abate all compulsory discipline proceedings** pending final resolution of the underlying criminal appeal;
- 2. Stay all hearings, deadlines, and adverse action** during the pendency of appellate review and until personal jurisdiction is properly established;
- 3. Quash service** of the compulsory discipline petition(s);
- 4. Sustain Respondent’s plea to the jurisdiction** and find that personal jurisdiction has not attached;
- 5. Grant all other relief** to which Respondent is justly entitled.

Respectfully submitted,

THELMA M. ANDERSON Respondent

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

**IN THE MATTER OF
THELMA M. ANDERSON,
STATE BAR CARD NO. 24091728**

§
§
§

CAUSE NO. 71154

PETITION FOR COMPULSORY DISCIPLINE

TO THE BOARD OF DISCIPLINARY APPEALS:

The Commission for Lawyer Discipline (hereinafter referred to as “the Commission”), brings this compulsory discipline action against attorney Thelma M. Anderson (“Respondent”), showing as follows:

1. This action is commenced by the Commission pursuant to Part VIII of the Texas Rules of Disciplinary Procedure. The Commission is providing Respondent a copy of this Board's procedures for handling a compulsory discipline matter by attaching a copy of such procedures to this petition.

2. Respondent may be served with a true and correct copy of this Petition for Compulsory Discipline and its attachments, as well as a notice of hearing, at Thelma M. Anderson, 3416 Country Club Drive W, Apt. 122, Irving, Texas 75038-8182.

3. On or about May 21, 2024, Respondent was charged by Indictment (Exhibit 1) in Cause No. 3:24-CR-00191-K, styled *United States of America v. Thelma Marshall Anderson*, in the United States District Court for the Northern District of Texas, Dallas Division, which states in pertinent part as follows:

General Allegations

1. The Paycheck Protection Program ("PPP"), implemented by the Small Business Administration, was a COVID-19 relief program that, among other things, provided small businesses with forgivable loans to pay for payroll and certain other expenses. Under the PPP, participating third-party lenders approved loan applications and disbursed PPP loans to qualifying businesses.

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

IN THE MATTER OF THELMA M. ANDERSON, STATE BAR CARD NO. 24091728	§ § §	CAUSE NO. 71154
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FIRST AMENDED PETITION FOR COMPULSORY DISCIPLINE

TO THE BOARD OF DISCIPLINARY APPEALS:

The Commission for Lawyer Discipline (hereinafter referred to as “the Commission”), brings this compulsory discipline action against attorney Thelma M. Anderson (hereinafter referred to as “Respondent”), showing as follows:

1. This action is commenced by the Commission pursuant to Part VIII of the Texas Rules of Disciplinary Procedure. The Commission is providing Respondent a copy of this Board's procedures for handling a compulsory discipline matter by attaching a copy of such procedures to this petition.

2. Respondent may be served with a true and correct copy of this First Amended Petition for Compulsory Discipline and its attachments, as well as a notice of hearing, at Thelma M. Anderson, 3416 Country Club Drive W, Apt. 122, Irving, Texas 75038-8182.

3. On or about May 21, 2024, Respondent was charged by Indictment (Exhibit 1) in Cause No. 3:24-CR-00191-K, styled *United States of America v. Thelma Marshall Anderson*, in the United States District Court for the Northern District of Texas, Dallas Division, which states in pertinent part as follows:

General Allegations

1. The Paycheck Protection Program ("PPP"), implemented by the Small Business Administration, was a COVID-19 relief program that, among other things, provided small businesses with forgivable loans to pay for payroll and certain other



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IN THE MATTER OF §
THELMA M. ANDERSON, § CAUSE NO. 71154
STATE BAR CARD NO. 24091728 §

SECOND AMENDED PETITION FOR COMPULSORY DISCIPLINE

TO THE BOARD OF DISCIPLINARY APPEALS:

The Commission for Lawyer Discipline (hereinafter referred to as “the Commission”), brings this compulsory discipline action against attorney Thelma M. Anderson (hereinafter referred to as “Respondent”), showing as follows:

1. This action is commenced by the Commission pursuant to Part VIII of the Texas Rules of Disciplinary Procedure. The Commission is providing Respondent a copy of this Board's procedures for handling a compulsory discipline matter by attaching a copy of such procedures to this petition.

2. Respondent may be served with a true and correct copy of this Second Amended Petition for Compulsory Discipline and its attachments, as well as a notice of hearing, at Thelma M. Anderson, 3416 Country Club Drive W, Apt. 122, Irving, Texas 75038-8182.

3. On or about May 21, 2024, Respondent was charged by Indictment (Exhibit 1) in Cause No. 3:24-CR-00191-K, styled *United States of America v. Thelma Marshall Anderson*, in the United States District Court for the Northern District of Texas, Dallas Division, which states in pertinent part as follows:

General Allegations

1. The Paycheck Protection Program ("PPP"), implemented by the Small Business Administration, was a COVID-19 relief program that, among other things, provided small businesses with forgivable loans to pay for payroll and certain other

CAUSE NO.:

THELMA ANDERSON

Plaintiff,

v.

DALLAS COUNTY DISTRICT

ATTORNEY'S OFFICE, JOHN

CREUZOT, in his official capacity, PAUL

HAMILTON, in his official capacity,

CHONG CHOE, in her official capacity,

Defendants,

IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

____JUDICIAL DISTRICT

**PLAINTIFF'S FOR WRIT OF MANDAMUS, AND IN THE ALTERNATIVE, FOR
DECLARATORY AND INJUNCTIVE RELIEF, WITH REQUEST
FOR ATTORNEY'S FEES AND COSTS**

Plaintiff files this First Amended Petition and would respectfully show:

I. INTRODUCTION

1. This is a Texas Public Information Act (TPIA) enforcement action to compel Defendants to produce public information already ordered released by the Office of the **Attorney General (OAG) in Open Records Letter Ruling OR2025-017868 (May 23, 2025)**.
2. Despite that binding ruling, Defendants produced only a fraction of the ordered records, then rejected targeted resubmissions and refused to release the rest—well past statutory timelines and without any valid legal basis. See Tex. Gov't Code §§ 552.221, 552.301, 552.321.

II. PARTIES

3. Plaintiff **THELMA ANDERSON** is the requestor under the TPIA and resides in Dallas County, Texas.
4. **Defendant Dallas County, Texas** may be served through the Dallas County Judge or as otherwise permitted by law.
5. **Defendant John Creuzot**, sued in his **official capacity**, is the elected District Attorney of Dallas County, Texas, and as such is the official responsible for ensuring compliance with the Texas Public Information Act (“TPIA”) on behalf of the Dallas County District Attorney’s Office.
6. **Defendant Paul Hamilton**, sued in his **official capacity**, is an employee and agent of the Dallas County District Attorney’s Office who participated in or facilitated the refusal to release the requested public records.
7. **Defendant Chong Choe**, sued in her official capacity only, is an employee and agent of the Dallas County District Attorney’s Office who participated in and/or communicated the refusal to comply with the Attorney General’s ruling.
8. At all relevant times, the **Dallas County District Attorney’s Office**, through its elected District Attorney and authorized employees, was the governmental body in possession of the requested public records and was legally obligated to comply with the Attorney General’s ruling under Tex. Gov’t Code §§ 552.321 and 552.324.
9. Because Defendants failed to file a declaratory judgment action within the statutory deadline to challenge the Attorney General’s ruling, compliance with that ruling is now **mandatory and ministerial**, leaving **no discretion** under law. Mandamus relief is therefore proper.
10. **Defendant Dallas County District Attorney’s Office** may be served through the elected District Attorney (official capacity) and/or its Public Information Officer/records custodian.

III. JURISDICTION & VENUE

11. Jurisdiction & standing. Jurisdiction is proper under the Texas Public Information Act (“TPIA”). A requestor has standing to file suit for a writ of mandamus to compel a governmental body to make information available for inspection and copying. Tex. Gov’t Code §§ 552.321(a). Plaintiff, as the requestor and beneficiary of the OAG’s final ruling, has standing to enforce compliance.
12. Venue lies in a district court in Dallas County, where Defendants’ main offices are located. Tex. Gov’t Code §§ 552.321(b).

IV. IMMUNITY AND JURISDICTIONAL OBJECTIONS

13. Dallas County may assert immunity or file a plea to the jurisdiction to avoid compliance with the Attorney General’s Order under the Texas Public Information Act (“PIA”). These objections are unfounded for the following reasons:

- a. **Waiver of Immunity Under the Public Information Act:** Texas Government Code **§552.321** expressly authorizes a requestor to file suit or seek mandamus relief when a governmental body refuses to supply public information. This statute constitutes a legislative waiver of immunity for purposes of compelling compliance with the PIA. By refusing to comply with a final OAG order, Dallas County places itself squarely within the scope of **§552.321**, which provides both the remedy and the jurisdictional grant for judicial enforcement.
- b. **Ministerial Duty Eliminates Discretion:** The Attorney General’s ruling is binding when no timely challenge is filed under **§552.324**. Once the deadline to challenge has expired, the governmental body has no discretion to withhold the information it has a ministerial duty to comply. A writ of mandamus is the proper mechanism to enforce compliance where the law imposes a clear, non-discretionary duty.
- c. **Jurisdiction Lies in District Court:** Texas courts have consistently held that district courts possess jurisdiction over mandamus actions to enforce the PIA against local governmental entities. Jurisdiction is not defeated by general assertions of immunity because the Legislature expressly authorized both the remedy and the forum.
- d. **Empower Texans v. Dallas County Distinguished:** In *Empower Texans, Inc. v. Dallas County*, the County succeeded on a plea to the jurisdiction only because the plaintiff failed to invoke the proper statutory basis for suit and did not rely on a final OAG ruling. Here, the circumstances are substantially different:
 - i. A final, enforceable OAG order exists;
 - ii. The County did not timely seek declaratory relief under **§552.324**;
 - iii. The Petitioner is proceeding under **§552.321** (mandamus enforcement of the PIA), not a free-standing challenge;
 - iv. The County’s continued withholding is not discretionary it is unlawful. Thus, Empower Texans does not bar this proceeding and provides no jurisdictional shield where the Petitioner seeks to enforce a binding OAG directive through an expressly authorized statutory remedy.
- e. **No Adequate Remedy by Appeal:** Because the County has simply refused to comply and the PIA does not provide an alternative appellate remedy for the requestor, mandamus is proper. The unavailability of a meaningful alternative remedy further defeats any jurisdictional objection.
- f. **Sovereign Immunity Does Not Apply to Ultra Vires Conduct:** When a governmental official or entity refuses to perform a legal, ministerial duty imposed by statute, such refusal constitutes ultra vires conduct. Suits to compel public officials to comply with statutory duties are not barred by immunity. Here, Dallas County is acting outside its lawful authority by disregarding a binding OAG ruling.

V. STATEMENT OF FACTS

This action arises from the Dallas County District Attorney's Office's continued and willful refusal to comply with a binding order issued by the Office of the Attorney General ("OAG") on May 23, 2025, in response to Plaintiff's Texas Public Information Act ("TPIA") request dated March 7, 2025. The OAG ordered the full release of specified public records, yet Defendants have produced only a fraction of what was required and have intentionally withheld the remaining documents without any legal justification.

Rather than comply following the ruling, the Dallas County District Attorney's Office delayed responses, rejected follow-up communications, and forced Plaintiff to repeatedly submit noncompliance notices to both the agency and the OAG. Despite multiple written reminders and over 120 days passing since the OAG's decision, Defendants still refuse to release the ordered records.

The refusal is not accidental or administrative it is deliberate. On September 29, 2025, during an in-person visit to the Civil Division, a representative of the Dallas County District Attorney's Office stated that the Office had "no intentions of turning over any more documents" responsive to the OAG ruling. This unequivocal statement confirms an intentional and ongoing violation of the TPIA and the OAG's final decision.

Because Defendants did not file a timely declaratory judgment action under Tex. Gov't Code §§ 552.324, the Attorney General's ruling is final and enforceable. Their continued withholding of records is unlawful, leaves no adequate remedy at law, and necessitates judicial enforcement. Plaintiff now seeks a writ of mandamus compelling immediate compliance with the OAG order and the requirements of the Texas Public Information Act.

13. **March 7, 2025** — **Initial Request.** Plaintiff submitted a **Texas Public Information Act (TPIA)** request to the Dallas County District Attorney's Office regarding alleged false-statement participation. **(Ex. B)**
14. **March 24, 2025** — **Statutory Reminder.** Plaintiff emailed the DA's Office citing Tex. Gov't Code § 552.221(a) (prompt production "as soon as possible, within a reasonable time") and the 10-business-day deadline in § 552.301(b) for a governmental body to request an OAG decision and state the exceptions relied upon or otherwise produce/certify timing if production could not be completed within 10 business days. (Ex. B)
15. **March 25, 2025** — **Request to Withhold.** The DA's Office sought an **Attorney General decision** to withhold records under claimed exceptions. **(Ex. I)**
16. **March 28, 2025** — **Follow-Up on Noncompliance.** Plaintiff followed up with the DA's Office regarding noncompliance with TPIA timelines and lack of production. **(Ex. I)**

17. **March 31, 2025** — **Additional Submission to OAG.** The DA’s Office submitted further briefing “appeal”-style correspondence to the OAG in support of withholding. **(Ex. D)**
18. **April 1, 2025** — **Litigation Exception Asserted, Rebuttal.** The DA’s Office invoked the **anticipated-litigation exception** (citing a press conference). **(Ex. D)**
19. **On May 23, 2025,** the OAG issued **OR2025-017868,** directing the Dallas County District Attorney’s Office to release the remaining submitted information responsive to Plaintiff’s request. The ruling also addresses and rejects the DA’s invocation of “anticipated litigation” under controlling standards **(Ex. A).** (see Order pp. 2–3).
20. **July 24, 2025, 1:42 a.m. and 5:44 p.m.:** I reached out to the DA’s Office regarding the OAG’s May 23, 2025, order; they were over 60 days in noncompliance.
21. **July 25, 2025, 4:36 p.m.:** I sent a noncompliance notice.
22. **July 30, 2025, (11:43 a.m.)** — Via the request portal, Plaintiff notified the DA’s Office of a two-month delay in complying with the OAG’s ruling. Paralegal Stephanie Bacon responded regarding records Plaintiff should be allowed to inspect; however, the request was then closed without producing all ordered records. Only approximately 30% of the responsive records were produced; the remainder was withheld. **(Ex. C, D).**

A. Documents Turned over and what was not turned over:

- a. **2016–2017 (turned over)**
 - Shawnkeedra Martin, evaluator
- b. **2017–2018**
 - Employee evaluation missing
- c. **2018–2019 (turned over)**
 - Travis Wiles, evaluator
- d. **2019–2020**
 - Employee evaluation missing
- e. **2021 (partially turned over)**
 - Drew Taylor, evaluator
 - Missing my evaluation response that was submitted via email to Jen Faulk, which is why I requested email communications between Jen Faulk and me. The file is also missing my complaint against Drew Taylor that was provided to Jen Faulk, Glen Fitzmartin, and Paul Hamilton on December 18, 2021. They refuse to turn over email communications that are mandated by the order.

ELECTRONIC DOCUMENTS UPLOADED TO THE PORTAL

07/30/2025	D024997-030725_-_Thelma_Anderson_Redacted.pdf
07/30/2025	DA_HR_-_Thelma_Anderson_Employee_File_Redacted.pdf
07/30/2025	HR_-_Thelma_Anderson_-_Employee_File_Redacted.pdf
07/30/2025	John_Creuzot_-_Oath.pdf January 1, 2023
07/30/2025	Paul_Hamilton_-_Oath.pdf January 1, 2023
07/30/2025	Policy_Manual_-_Faith_Johnson_signature.pdf
07/30/2025	Policy_Manual_-_John_Creuzot_with_3.13_revision_.pdf January 1, 2023
07/30/2025	Policy_Manual_-_Revised_October_2016.pdf

24. **August 15, 2025** — Plaintiff resubmitted a request specifically listing the still-missing documents the OAG ordered released. The DA’s Office rejected the request. **(Ex. E)**.
25. **August 19, 2025** — The DA’s Office issued a written rejection stating the request was not a TPIA request and closed it, referencing D029047-081525 and prior D024997-030725. This was not a new request; it sought the same already-ordered records. **(Ex. F)**.
26. **August 19, 2025** (4:09 p.m.) — Plaintiff emailed a Notice of Noncompliance to Chong Choe, Chief of the Dallas County Civil Division. No response. **(Ex. G-1)**.
27. **August 20, 2025** (10:13 a.m.); August 25, 2025 (9:35 a.m.); August 28, 2025 (8:09 p.m.) Plaintiff re-sent the Notice of Noncompliance on the dates/times listed. No response. **(Ex. G-2 to G-5)**.
28. **August 29, 2025** — Records remained withheld; the portal still showed “in progress” with no lawful explanation or production.
29. **September 2, 2025** — Plaintiff emailed the Civil Division of the DA’s Office regarding the outstanding order. At 2:02 p.m., the OAG called and advised Plaintiff may file a writ of mandamus; Plaintiff was told two assigned OAG lawyers have roughly 400 pending complaints, potentially delaying OAG enforcement. **(Ex. G-1)**.
30. **September 19, 2025** — Plaintiff emailed Public Integrity, attaching the names of the civil lawyers responsible for failing to produce the ordered records.

31. As of **September 29, 2025**—129 days after the May 23 ruling Defendants still had not produced the ordered records, nor sought or obtained any court order superseding the OAG’s decision.
32. **September 29, 2025** — In-Person Refusal at Civil Division (Recorded). On this date, Plaintiff personally visited the Dallas County District Attorney’s Office, Civil Division, and spoke with a prosecutor who identified himself as “Scott Stephenson.” Scott Stephenson stated, verbatim, that the office had “no intentions of turning over any more documents.” Plaintiff informed Scott Stephenson that the office had not produced the records the OAG ordered released; ADA Scott Stephenson reiterated that the office did not intend to turn them over. Plaintiff recorded this exchange
33. **Scott Stephenson’s** recorded statement reflects a knowing and continuing refusal to comply with OAG OR2025-017868 and the Texas Public Information Act, independent of any logistical or good-faith search issues, and further demonstrates the need for expedited mandamus relief and a date-certain production order.
34. The **“Anticipated Litigation”** Exception Was Rejected in the Order the OAG explained that mere public threats or attorney involvement, without objective steps toward filing suit, do not establish “litigation reasonably anticipated.” See Order p. 3 (**citing ORD 331, ORD 361**). The DA’s Office failed to show any objective steps toward litigation as of the request date. Accordingly, the Order requires release of the remaining information which has still not occurred, **and they stated they have no plans in doing so.**

Documents Still-Missing Items

35. Date-specific Oaths of Office: John Creuzot (2016) and Paul Hamilton (2019). The DA’s Office produced 2023 instead of the ordered years.
36. Emails/communications within the exact date ranges specified in Plaintiff’s request and recognized by the OAG ruling.
37. For any item claimed not to exist, Defendants have not provided a sworn custodian certification detailing systems searched, search terms, and nonexistence basis.
 - a. This is not the full list just an example of the District Attorney’s willful disregard of the OAG’s order.

VI. CAUSE OF ACTION — PETITION WRIT OF MANDAMUS **(Tex. Gov’t Code § 552.321)**

38. The TPIA imposes a ministerial duty on Defendants to promptly produce public information absent a valid exception and, here, to comply with the OAG’s binding order. Mandamus is expressly authorized to compel disclosure where a governmental body refuses to supply information the OAG has determined is public. Tex. Gov’t Code §§ 552.321(a).

39. Defendants have refused to supply information already determined to be public and failed to comply with § 552.221, 552.301. Plaintiff lacks an adequate remedy at law; the TPIA recognizes mandamus as the proper vehicle to enforce prompt disclosure. Because Defendants did not seek declaratory relief under §552.324 within the statutory period, the OAG’s ruling is final, and compliance is a ministerial, nondiscretionary duty enforceable by mandamus.

VII. ALTERNATIVE RELIEF — DECLARATORY & INJUNCTIVE RELIEF
(Tex. Gov’t Code § 552.3215)

40. In the alternative or in addition, Plaintiff seeks declaratory and injunctive relief confirming Defendants’ violations and ordering immediate production and compliance. Tex. Gov’t Code §§ 552.3215.

VIII. ATTORNEY’S FEES & COSTS

41. 1. Plaintiff seeks reasonable attorney’s fees and costs as permitted by the TPIA upon obtaining relief. Tex. Gov’t Code § 552.323. (If pro se, omit fees request.)

IX. NOTICE OF STATUTORY CONSEQUENCES

42. Defendants’ willful refusal to release public information ordered to be disclosed may expose responsible officers to criminal liability under § 552.353 and civil enforcement under § 552.3215. This Court need not adjudicate those penalties to grant mandamus; they underscore the urgency of compliance.

X. REQUEST FOR EXPEDITED HEARING

43. Plaintiff requests an expedited setting and abbreviated briefing schedule due to ongoing deprivation of statutory rights and the straightforward mandamus posture recognized by § 552.321. Plaintiff further requests that the Court require an authorized representative of the Dallas County District Attorney’s Office (records custodian or designee) to appear at the hearing prepared to explain, under oath, the basis for the continued refusal and to commit to a date-certain compliance schedule.

XI. PRAYER

Plaintiff prays that the Court:

- I. 1. Issue a Writ of Mandamus compelling Dallas County and the Dallas County District Attorney’s Office to produce all records identified in OR2025-017868 within three (3) business days of this Order, or by another date certain set by the Court;
- II. 2. Order Defendants to provide a complete index/certification of compliance identifying custodians, systems searched, date ranges, and Bates references for each request item;
- III. 3. Require the records custodian (or authorized designee) to appear at the hearing to explain noncompliance and to establish a binding, date-certain plan for full production;

- IV. 4. In the alternative (or in addition), declare that Defendants violated the TPIA and enjoin them to produce all responsive records forthwith (Tex. Gov't Code § 552.3215);
- V. 5. Award attorney's fees and costs as permitted by law (Tex. Gov't Code § 552.323);
- VI. 6. Grant such other and further relief—legal or equitable—to which Plaintiff shows just entitlement.

VERIFICATION

I, Thelma Anderson, verify under penalty of perjury that I have read the foregoing Petition and that the facts stated therein are true and correct to the best of my knowledge.

/s/ Thelma Anderson
Thelma Anderson

3436 W Commerce St
Dallas, Texas 75208
469-623-8009
info@tellalawyergruop.com
Plaintiff Pro Se

EXHIBIT LIST

- Ex. A — OAG Letter Ruling OR2025-017868 (May 23, 2025).
- Ex. B — Original request and date-ranged itemization.
- Ex. C — July 30, 2025, partial production (30%), with highlight of missing items.
- Ex. D — July 30, 2025 (11:43 a.m.) portal message + response from Stephanie Bacon; request closure screenshot.
- Ex. E — August 15, 2025, resubmission for missing ordered records + rejection.
- Ex. F — August 19, 2025, written rejection **D029047-081525** and referencing **D024997-030725**; closure notice.
- Ex. G-1 to G-5 — Notices of Noncompliance to Chong Choe (emails sent: Aug. 19 at 4:09 p.m.; Aug. 20 at 10:13 a.m.; Aug. 25 at 9:35 a.m.; Aug. 28 at 8:09 p.m. Sept 2 at 2:02 p.m.)
- Ex. H — 2022 Public Information Request
- Ex. I — Plaintiff's Declaration re Sept. 29, 2025, encounter with Scott Stephenson; audio lodged as Ex. I-1.
- I spoke with a prosecutor who identified himself as "Scott Stephenson." During our conversation, Scott Stephenson stated, verbatim, that the office had "no intentions of turning over any more documents turned over so far." When I informed him that the office had not produced the records ordered by the OAG, Scott Stephenson reiterated that the office did not intend to turn them over. I recorded this exchange. A true audio file is being lodged with the Court as Ex. I-1.
- Ex. J — Defendant's Letters to the OAG

I declare under penalty of perjury that the foregoing is true and correct. Executed in Dallas County, Texas, on **October 23**, 2025.



Thelma Anderson

Ex. A
OAG ORDER



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

May 23, 2025

Ms. Raven Williams
Assistant District Attorney
Dallas County District Attorney's Office, Civil Division
500 Elm Street, Suite 6300
Dallas, Texas 75202

OR2025-017868

Dear Ms. Williams:

You ask whether certain information is subject to required public disclosure under the Public Information Act (the "Act"), chapter 552 of the Government Code. Your request was assigned ID# 25-012174 [ORR D024997].

The Dallas County District Attorney's Office (the "district attorney's office") received a request for specified communications and information pertaining to the requestor's employment history. You claim the submitted information is excepted from disclosure under section 552.103 of the Government Code. We have considered the exception you claim and reviewed the submitted information.¹ We have also received and considered comments submitted by the requestor. *See Gov't Code* § 552.304 (interested party may submit comments stating why information should or should not be released).

Initially, we note the submitted information includes a grand jury subpoena. The Act applies only to information that is "written, produced, collected, assembled, or maintained under a law or ordinance or in connection with the transaction of official business . . . by a governmental body[.]" *Id.* § 552.002(a)(1). The judiciary is expressly excluded from the requirements of the Act. *Id.* § 552.003(1)(B). This office has determined for purposes of the Act, a grand jury is a part of the judiciary and therefore not subject to the Act. *See Open Records Decision No. 411 (1984)*. Further, records kept by a governmental body that is acting as an agent for a grand jury are considered records in the constructive possession of

¹ We assume the "representative sample" of records submitted to this office is truly representative of the requested records as a whole. *See Open Records Decision Nos. 499 (1988), 497 (1988)*. This open records letter does not reach, and therefore does not authorize the withholding of, any other requested records to the extent those records contain substantially different types of information than that submitted to this office.

the grand jury, and are also not subject to the Act. *See* Open Records Decisions Nos. 513 (1988), 411, 398 (1983). Thus, to the extent the district attorney's office holds the grand jury subpoena solely as an agent of the grand jury, such information consists of records of the judiciary that are not subject to disclosure under the Act and the district attorney's office is not required to release that information in response to the instant request. To the extent the district attorney's office holds the information at issue in its own capacity and not solely as an agent of the grand jury, we will address the argument against its disclosure.

Section 552.103 of the Government Code provides, in relevant part:

(a) Information is excepted from [required public disclosure] if it is information relating to litigation of a civil or criminal nature to which the state or a political subdivision is or may be a party or to which an officer or employee of the state or a political subdivision, as a consequence of the person's office or employment, is or may be a party.

...

(c) Information relating to litigation involving a governmental body or an officer or employee of a governmental body is excepted from disclosure under Subsection (a) only if the litigation is pending or reasonably anticipated on the date that the requestor applies to the officer for public information for access to or duplication of the information.

Gov't Code § 552.103(a), (c). The governmental body has the burden of providing relevant facts and documents to show section 552.103(a) is applicable in a particular situation. The test for meeting this burden is a showing that (1) litigation was pending or reasonably anticipated on the date the governmental body received the request for information, and (2) the information at issue is related to that litigation. *Univ. of Tex. Law Sch. v. Tex. Legal Found.*, 958 S.W.2d 479, 481 (Tex. App.—Austin 1997, orig. proceeding); *Heard v. Houston Post Co.*, 684 S.W.2d 210, 212 (Tex. App.—Houston [1st Dist.] 1984, writ ref'd n.r.e.); Open Records Decision No. 551 at 4 (1990). The governmental body must meet both parts of this test for information to be excepted from disclosure under section 552.103(a). *See* ORD 551 at 4.

To establish litigation is reasonably anticipated, a governmental body must provide this office "concrete evidence showing that the claim that litigation may ensue is more than mere conjecture." *See* Open Records Decision No. 452 at 4 (1986). Concrete evidence to support a claim litigation is reasonably anticipated may include, for example, the governmental body's receipt of a letter containing a specific threat to sue the governmental body from an attorney for a potential opposing party. *See* Open Records Decision No. 555 (1990); *see also* Open Records Decision No. 518 at 5 (1989) (litigation must be "realistically contemplated"). In addition, this office has concluded litigation was reasonably anticipated when the potential opposing party hired an attorney who made a demand for disputed payments and threatened to sue if the payments were not made promptly, or when an individual threatened to sue on several occasions and hired an attorney. *See* Open Records Decision Nos. 346 (1982), 288 (1981). On the other hand, this office has determined if an individual publicly threatens to bring suit against a

governmental body, but does not actually take objective steps toward filing suit, litigation is not reasonably anticipated. *See* Open Records Decision No. 331 (1982). Further, the fact that a potential opposing party has hired an attorney who makes a request for information does not establish litigation is reasonably anticipated. *See* Open Records Decision No. 361 (1983). Upon review, we find the district attorney's office has not provided this office with evidence the requestor or any other individual had taken any objective steps toward filing a lawsuit prior to the date the district attorney's office received the request for information. *See* Gov't Code § 552.301(e); ORD 331. Thus, we find the district attorney's office has not established litigation was reasonably anticipated on the date the district attorney's office received the request for information.

In summary, to the extent the district attorney's office holds the grand jury subpoena solely as an agent of the grand jury, such information consists of records of the judiciary that are not subject to disclosure under the Act and the district attorney's office is not required to release that information in response to the instant request. The district attorney's office must release the remaining submitted information.²

This letter ruling is limited to the particular information at issue in this request and limited to the facts as presented to us; therefore, this ruling must not be relied upon as a previous determination regarding any other information or any other circumstances.

This ruling triggers important deadlines regarding the rights and responsibilities of the governmental body and of the requestor. For more information concerning those rights and responsibilities, please visit our website at <https://www.texasattorneygeneral.gov/open-government/members-public/what-expect-after-ruling-issued> or call the OAG's Open Government Hotline, toll free, at (877) 673-6839. Questions concerning the allowable charges for providing public information under the Public Information Act may be directed to the Cost Rules Administrator of the OAG, toll free, at (888) 672-6787.

Sincerely,

Paige Lay
Assistant Attorney General
Open Records Division

PL/mo

Ref: ID# 25-012174

c: Requestor

² We note the requestor has a special right of access to some of the information being released in this instance. *See* Gov't Code § 552.023(a) (person or person's authorized representative has special right of access to records that contain information relating to the person that are protected from public disclosure by laws intended to protect that person's privacy interests); Open Records Decision No. 481 at 4 (1987) (privacy theories not implicated when individuals request information concerning themselves). Because such information is confidential with respect to the general public, if the district attorney's office receives another request for this information from a different requestor, then the district attorney's office must again seek a ruling from this office

Ex. B
Original Public Information Request
March 7, 2025



Public Records Center

Public Records Menu

[View File\(s\)](#) [View Message\(s\)](#)

- Home
- FAQs
- Public Archive
- My Request Center

FAQs

[See All FAQs](#)

How may I obtain the Cast Vote Records from Dallas County for the 2020 General Election?

How are written questions to the County treated under the Public Information Act?

How will I receive the records in response to my request?

How do I obtain information regarding the Public Information Act?

Request Type: Dallas County Department Request

Description: N/A

Contact E-Mail:

Reference No: D024997-030725

Status: Redacted Records Released

Balance Due: \$0.00

Payments: \$0.00

UPLOAD DATE

DOWNLOAD ALL

Files:	UPLOAD DATE	File Name
	07/30/2025	ee_File_Redacted.pdf
	07/30/2025	John_Creuzot_-_Oath.pdf
	07/30/2025	Paul_Hamilton_-_Oath.pdf
	07/30/2025	Policy_Manual_-_Faith_Johnson_signature.pdf
	07/30/2025	Policy_Manual_-_John_Creuzot_with_3.13_revision.pdf
	07/30/2025	Policy_Manual_-_Revised_October_2016.pdf
	07/30/2025	DALLAS_COUNTY_Noncompliance_OAG_7_30.pdf
	07/29/2025	OR2025-017868.pdf
	07/25/2025	DALLAS_COUNTY_Final_Notice_Noncompliance_OAG.pdf

In accordance with the Public Information Act, Chapter 552 of the Texas Government Code, Dallas County makes all of its public records available to citizens. The Public Information Act does not require governmental bodies to create new information, perform legal research, or to answer questions. The request must ask for records or information already in existence.

Dallas County will respond within ten business days to information requests. Dallas County may collect a fee as prescribed by law or regulation for the requested documents. If a fee is not prescribed by law or regulation, the fee shall be the actual cost of duplicating the record. For more information on the Public Information Act, please visit the [Texas Attorney General website](#).

Dallas County Departments: Other

DCMS Case Number:

Start Date: 3/7/2025

End Date:

Describe the Record(s) Requested:

THE RECORDS INCLUDED REQUEST FOR EMPLOYEE DOCUMENTS/FILES, EMAIL AND PHONE COMMUNICATION BASED ON THE SCOPE OF THE REQUEST AND EMPLOYEE DEMOGRAPHICS

Be as specific as possible. Failure to provide specific information will result in the delay of fulfilling your request. Please provide all information you have concerning your request.

Preferred Method to Receive Records: Electronic via Records Center

Please note not all public documents are available in electronic format. If the document(s) requested are not available electronically, we will make them available for inspection or by paper copy in accordance with the Public Records Law.

In making this request I understand that the information will be released only in accordance with the Public Information Act and Dallas County reserves the right to seek an opinion from the Texas Attorney General with regard to the release of said information. If an Attorney General's opinion is sought by Dallas County, you will be notified in writing.

I Agree: Yes

By checking the "I Agree" box,

**you agree and acknowledge
your electronic signature is
valid and binding in the same
force and effect as a
handwritten signature.**

New Message

Cancel

Messages 14

 Print Messages (PD)

✓ ↩ On 8/12/2025 9:40:06 AM, Thellma Anderson wrote:

TO: "Support DALLASCOUNTYTX"[dallascountytx@govqa.us]
Where do I pick up my records? I'm on a wild goose chase because you all stated records and no location.

On Jul 30, 2025, at 11:43 AM, DALLASCOUNTYTX Support wrote:

Attachments:

[OR2025-017868.pdf](#)

> ↩ On 8/7/2025 2:37:41 PM, Thellma Anderson wrote:

> ↩ On 8/1/2025 1:11:32 AM, Thellma Anderson wrote:

> ☑ On 7/30/2025 11:43:00 AM, DALLASCOUNTYTX Support wrote:

> ↩ On 7/30/2025 11:29:51 AM, Thellma Anderson wrote:

> ↩ On 7/25/2025 4:36:53 PM, Thellma Anderson wrote:

> ↩ On 7/24/2025 5:44:13 PM, Thellma Anderson wrote:

> ↩ On 7/24/2025 1:42:20 AM, Thellma Anderson wrote:

> ↩ On 4/2/2025 5:09:30 PM, Thellma Anderson wrote:

> ☑ On 4/1/2025 4:58:26 PM, DALLASCOUNTYTX Support wrote:

> ↩ On 3/25/2025 9:06:36 AM, Thellma Anderson wrote:

> ☑ On 3/24/2025 4:34:37 PM, DALLASCOUNTYTX Support wrote:

> ☑ On 3/7/2025 5:46:47 PM, DALLASCOUNTYTX Support wrote:

✓ ☑ On 3/7/2025 5:46:45 PM, Thellma Anderson wrote:

Request Created on Public Portal

D024997-030725 - Dallas County Department Request

Message History (14)

← On 8/12/2025 9:40:06 AM, Thellma Anderson wrote:

TO: "Support DALLASCOUNTYTX"[dallascountytx@govqa.us]

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On Jul 30, 2025, at 11:43 AM, DALLASCOUNTYTX Support wrote:

Attachments:

OR2025-017868.pdf

← On 8/7/2025 2:37:41 PM, Thellma Anderson wrote:

There are still a large amount of documents that are missing you have yet to respond about.

On August 1, 2025 I submitted this letter based on incomplete documents per my request where you have failed to provide. Please be advised that you have not turned over all documents required by my public records request. Specifically, the Oaths of Office for Paul Hamilton and John Cruzot both multi-term officials are still missing. These are not discretionary records. Your failure to produce them remains a direct violation of the Texas Public Information Act.

← On 8/1/2025 1:11:32 AM, Thellma Anderson wrote:

There are still a large number of missing records.

✉ On 7/30/2025 11:43:00 AM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] Dallas County Department Request :: D024997-030725

Body:

July 30, 2025

Thellma Anderson


RE: Public Records Request for Dallas County Department Request records, Reference# D024997-030725

Dear Thellma Anderson,

Please see the attached Attorney General's Office Ruling (OR2025-017868). The records identified as responsive to your request are accessible via "My Request Center" on the online public records portal. Please log in to your online account to retrieve the records.

Please be advised the questions you have posed require narrative responses. The TPIA does not incorporate a mechanism for soliciting or providing narrative responses. A request must ask for records or information already in existence.

Please be further advised redactions have been applied as required to avoid disclosure of specific categories of information that are deemed confidential.

With this response—the records available via the Records Center—our office will consider your request a closed matter.

Thank you,

Stephanie Bacon
Paralegal
Dallas County District Attorney's Office - Civil Division, PIA Section

↩ On 7/30/2025 11:29:51 AM, Thellma Anderson wrote:

Please be advised that due to your continued failure to comply with the Office of the Attorney General's ruling dated May 23, 2025 (OR2025-017868), I have proceeded with filing a formal noncompliance complaint with the OAG and will now be filing a grievance with the State Bar of Texas.

← On 7/25/2025 4:36:53 PM, Thellma Anderson wrote:

NON COMPLIANCE

← On 7/24/2025 5:44:13 PM, Thellma Anderson wrote:

You have exhausted the working days provided under the Texas Public Information Act following the Attorney General's opinion issued on May 23, 2025. The information at issue is not subject to any valid exemption under the Freedom of Information Act (FOIA) or the Texas Government Code, per the OAG's ruling, and access to the requested documents must be granted immediately.

FOIA also provides that if only portions of the requested materials are exempt from release, the non-exempt portions must still be disclosed. Therefore, I am requesting the immediate release of all non-exempt portions, consistent with the determinations made by the Office of the Attorney General.

If any part or all of the materials are being withheld under any claimed FOIA exemption, please provide a detailed index or list identifying the specific materials withheld, consistent with the OAG's ruling.

There should be no barrier to providing the documents that the OAG identified for release. Please let me know immediately if any further clarification is needed or if arrangements are required to access the records. If any portion of this request is denied, you are required to:

- Cite the specific exemption(s) you claim based on the OAG ruling.

I can be reached at (318) 572-0332 or (469) 623-8009, and via email at thelma.anderson10@gmail.com.

You have exceeded the statutory timeline under Section 552(a)(6)(A)(i) of the Freedom of Information Act.

You have now had more than two additional months to comply. Please provide the requested materials immediately.

Thank you for your prompt attention to this matter.

/s/Thelma Anderson

← On 7/24/2025 1:42:20 AM, Thellma Anderson wrote:

On May 23, 2025, both you and I received the Office of the Attorney General's official determination regarding your attempt to deny my access to public information under the Texas Public Information Act (OR2025-017868). The OAG rejected your argument under Section 552.103 and concluded that, the Dallas County District Attorney's Office is required to release the requested records.

It has now been two months since that ruling, and you have failed to produce or finalize the disclosure of the public records that I am legally entitled to under the Attorney General's decision. This continued delay is unacceptable and constitutes noncompliance with the Texas Government Code.

I am requesting an immediate response confirming when you intend to release the responsive record. If I do not receive confirmation and the records by close of business Friday, I will be notifying the Office of the Attorney General that your office is in violation of the Public Information Act and is failing to comply with a lawful directive.

On 4/2/2025 5:09:30 PM, Thellma Anderson wrote:

Failure to Respond Within the Statutory Timeframe

Under the Texas Public Information Act (TPIA), Tex. Gov't Code § 552.221(a), a governmental body must promptly produce public information for inspection or duplication upon request. The law further specifies that a response must be provided within 10 business days (Tex. Gov't Code § 552.301(b)).

Please explain why you are in violation of the statutory timeframe? Please explain what was the delay? Please explain why it took for me reaching out well past the statutory timeframe for you to respond? Please explain to me what lawsuit have you been served with? Please explain how does my employee file which I'm entitled to the same file I requested in April of 2022 that was th subject of an unemployment hearing appeal that was not subjected to your belief of an exception? Please explain to me how does the demographics of the Dallas county DA's office fall under an exception? Please explain to me how my oath of office fall under an exception? please explain how the oath of office for a public official falls under an exception? Please explain which policy states that current or former employees are not entitled to their employee file regardless?

On 4/1/2025 4:58:26 PM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] Dallas County Department Request :: D024997-030725

Body:

April 01, 2025

Thellma Anderson

RE: Public Records Request for Dallas County Department Request records, Reference# D024997-030725

Dear Thellma Anderson,

Please see the attached correspondence regarding your request for public information.

Thank you,

Stephanie Bacon

Paralegal

Dallas County District Attorney's Office - Civil Division, PIA Section

← On 3/25/2025 9:06:36 AM, Thellma Anderson wrote:

TO: "Support DALLASCOUNTYTX"[dallascountytx@govqa.us]

What took so long to submit this request? If I didn't send my update request the office would have continued to delay my request. This is an attempt to delay my request mirrors my request that is on my profile from 2022. Now all of a sudden you all want to group it all together to delay my entire request. Please explain?

On Mar 24, 2025, at 4:35 PM, DALLASCOUNTYTX Support wrote:

Attachments:

03.24.25_PDF_Signed_-_10-day_AG_Letter_-_Thelma_Anderson_-_D024997-030725.pdf

✉ On 3/24/2025 4:34:37 PM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] Dallas County Department Request :: D024997-030725

Body:

March 24, 2025

Thellma Anderson


RE: Public Records Request for Dallas County Department Request records, Reference# D024997-030725

Dear Thellma Anderson,

Please see the attached correspondence regarding your request for public information.

Thank you,

Stephanie Bacon

Paralegal

Dallas County District Attorney's Office - Civil Division, PIA Section

✉ On 3/7/2025 5:46:47 PM, DALLASCOUNTYTX Support wrote:



Dear Attorney Thellma Anderson:

Dallas County received your request for information seeking:

Records Requested: THE RECORDS INCLUDED REQUEST FOR EMPLOYEE DOCUMENTS/FILES, EMAIL AND PHONE COMMUNICATION BASED ON THE SCOPE OF THE REQUEST AND EMPLOYEE DEMOGRAPHICS

Your request will be processed in accordance with the Texas Public Information Act ("TPIA"), with full consideration of the rights and responsibilities afforded to requestors and to governmental bodies under the TPIA.

If you have any questions or concerns, please reply to this email and a Dallas County representative will respond accordingly.

Thank you,

Stephanie Bacon

Paralegal

Dallas County District Attorney's Office -- Civil Division

To monitor the progress or update this request please log into the [Dallas County Public Records Center](#)



 On 3/7/2025 5:46:45 PM, Thellma Anderson wrote:

Request Created on Public Portal

Ex. C
July 30, 2025 partial
production (30%), with
highlight of missing items.

Public Records Center

Public Records Menu

- Home
- FAQs
- Public Archive
- My Request Center

FAQs

See All FAQs

How may I obtain the Cast Vote Records from Dallas County for the 2020 General Election?

How are written questions to the County treated under the Public Information Act?

How will I receive the records in response to my request?

How do I obtain information regarding the Public Information Act?

View File(s) View Message(s)

Request Type: Dallas County Department Request
Description: N/A
Contact E-Mail:
Reference No: D024997-030725
Status: Redacted Records Released
Balance Due: \$0.00
Payments: \$0.00

	UPLOAD DATE	FILE NAME
Files:	07/30/2025	D024997-030725_-_Thelma_Anderson_Redacted.pdf
	07/30/2025	DA_HR_-_Thelma_Anderson_Employee_File_Redacted.pdf
	07/30/2025	HR_-_Thelma_Anderson_-_Employee_File_Redacted.pdf
	07/30/2025	John_Creuzot_-_Oath.pdf
	07/30/2025	Paul_Hamilton_-_Oath.pdf
	07/30/2025	Policy_Manual_-_Faith_Johnson_signature.pdf
	07/30/2025	Policy_Manual_-_John_Creuzot_with_3.13_revision_.pdf
	07/30/2025	Policy_Manual_-_Revised_October_2016.pdf
	07/30/2025	DALLAS_COUNTY_Noncompliance_OAG_7_30.pdf
	07/29/2025	OR2025-017868.pdf
	07/25/2025	DALLAS_COUNTY_Final_Notice_Noncompliance_OAG.pdf
	07/24/2025	FOIA_Thelma_Anderson_.pdf

DOWNLOAD ALL

In accordance with the Public Information Act, Chapter 552 of the Texas Government Code, Dallas County makes all of its public records available to citizens. The Public Information Act does not require governmental bodies to create new information, perform legal research, or to answer questions. The request must ask for records or information already in existence. Dallas County will respond within ten business days to information requests. Dallas County may collect a fee as prescribed by law or regulation for the requested documents. If a fee is not prescribed by law or regulation, the fee shall be the actual cost of duplicating the record. For more information on the Public Information Act, please visit the [Texas Attorney General website](#).

Dallas County Departments: Other

DCMS Case Number:

Start Date: 3/7/2025

End Date:

Describe the Record(s) Requested: THE RECORDS INCLUDED REQUEST FOR EMPLOYEE DOCUMENTS/FILES, EMAIL AND PHONE COMMUNICATION BASED ON THE SCOPE OF THE REQUEST AND EMPLOYEE DEMOGRAPHICS

Be as specific as possible. Failure to provide specific information will result in the delay of fulfilling your request. Please provide all information you have concerning your request.

Preferred Method to Receive Records: Electronic via Records Center

Please note not all public documents are available in electronic format. If the document(s) requested are not available electronically, we will make them available for inspection or by paper copy in accordance with the Public Records Law.

In making this request I understand that the information will be released only in accordance with the Public Information Act and Dallas County reserves the right to seek an opinion from the Texas Attorney General with regard to the release of said information. If an Attorney General's opinion is sought by Dallas County, you will be notified in writing.

I Agree: Yes

By checking the "I Agree" box, you agree and acknowledge your electronic signature is valid and binding in the same force and effect as a handwritten signature.

New Message Cancel

Messages 14

Print Messages (PDF)

- On 8/12/2025 9:40:06 AM, Thellma Anderson wrote:
 TO: "Support DALLASCOUNTYTX"[dallascountytx@govqa.us]
 Where do I pick up my records? I'm on a wild goose chase because you all stated records and no location.
 On Jul 30, 2025, at 11:43 AM, DALLASCOUNTYTX Support wrote:

 Attachments:
 OR2025-017868.pdf
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- On 4/1/2025 4:58:26 PM, DALLASCOUNTYTX Support wrote:
- On 3/25/2025 9:06:36 AM, Thellma Anderson wrote:
- On 3/24/2025 4:34:37 PM, DALLASCOUNTYTX Support wrote:
- On 3/7/2025 5:46:47 PM, DALLASCOUNTYTX Support wrote:
- On 3/7/2025 5:46:45 PM, Thellma Anderson wrote:

The purpose of this letter is to request information pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. section 552. If this information is not available from your agency, please forward this request to the appropriate agency or advise me of the other agencies which might have this information.

Please provide me with a copy of the following items: If you don't have any records you need to confirm in writing which is required.

- Email communication between Thelma Anderson and Paul Hamilton.
- Email communication from Paul Hamilton to DA staff on March 25, 2022, regarding the new policy. If you don't have any records, you need to confirm in writing which is required.
- Email communication along with memos that I was not authorized to have outside employment include the meeting dates and signed copies. If you don't have any records, you need to confirm in writing which is required.
- Email communication between Thelma Anderson and Jennifer Faulk. **January 2018-March 2022**
- Email and Microsoft Teams communication between Thelma Anderson and Drew Taylor. **June 2021-December 2021**
- Email communication between Thelma Anderson and Rhonda Frosch. **July 2016-April 2022**
- Email communication between Thelma Anderson and Glen Fitzmartin. **January 2018-March 2022.**
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EMPLOYEE EMAIL AND PHONE COMMUNICATION WITH OTHER GOVERNMENT ENTITIES.

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submission, what was submitted, when it was submitted, who he submitted.

- Email or phone communication between **LaQuita Long** and The FBI, Homeland Security, DEA, IRS, CIA or Department of Justice (DOJ) pertaining to Thelma Anderson employment history with the Dallas County District Attorney's Office from. If you don't have any records you need to confirm in writing which is required.
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SCOPE OF REQUESTED EMAIL COMMUNICATION

Paul Hamilton:

- Please limit your search of the above item(s) to the period from January 2019, -March 25, 2022.

Kevin Brooks:

- Please limit your search of the above item(s) to the period from September 1, 2016-December 31, 2022.

Shawnkeedra Martin

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John Creuzot

- Please limit your search of the above item(s) to the period from January 2020, -March 25, 2022.

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- Please limit your search of the above item(s) to the period from October 1, 2019, -March 25, 2022.

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- How many Black male and female prosecutors were employed by the Dallas County DA's Office from January 2016 to December 2019?
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- **Cite the specific exemption(s)** you claim based on the OAG ruling.

You have exceeded the statutory timeline under **Section 552(a)(6)(A)(i)** of the Freedom of Information Act. You have now had more than **two additional months** to comply. Please provide the requested materials immediately.

Thank you for your prompt attention to this matter.

/s/Thelma Anderson

Ex. D
July 30, 2025 response from
Stephanie Bacon OAG order

✉ On 7/30/2025 11:43:00 AM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] Dallas County Department Request :: D024997-030725

Body:

July 30, 2025

Thellma Anderson

RE: Public Records Request for Dallas County Department Request records, Reference# D024997-030725

Dear Thellma Anderson,

Please see the attached Attorney General's Office Ruling (OR2025-017868). The records identified as responsive to your request are accessible via "My Request Center" on the online public records portal. Please log in to your online account to retrieve the records.

Please be advised the questions you have posed require narrative responses. The TPIA does not incorporate a mechanism for soliciting or providing narrative responses. A request must ask for records or information already in existence.

Please be further advised redactions have been applied as required to avoid disclosure of specific categories of information that are deemed confidential.

With this response—the records available via the Records Center—our office will consider your request a closed matter.

Thank you,

Stephanie Bacon

Paralegal

Dallas County District Attorney's Office - Civil Division, PIA Section

↩ On 7/30/2025 11:29:51 AM, Thellma Anderson wrote:

Please be advised that due to your continued failure to comply with the Office of the Attorney General's ruling dated May 23, 2025 (OR2025-017868), I have proceeded with filing a formal noncompliance complaint with the OAG and will now be filing a grievance with the State Bar of Texas.

Ex. E
August 15, 2025
resubmission for missing ordered records

Thelma Anderson

August 15, 2025

Dallas County District Attorney Office
LB 19 Frank Crowley Court Building 133 N Riverfront Blvd
Dallas, Tx, Texas 75207

Re: Freedom of Information Request

Dear Sir or Madam:

Subject: Final Demand for Compliance with Attorney General's Ruling – OR2025-017868

On **May 23, 2025**, both you and I received the Office of the Attorney General's official determination regarding your office's attempt to deny my access to public information under the Texas Public Information Act (OR2025-017868). The OAG **expressly rejected** your reliance on Section 552.103 and **affirmed** that, aside from materials held solely in the capacity of an agent for the grand jury, not communication, emails or documentation you submitted directly outside of the grand jury agency protection since there was a broad misinterpretation of the law that was clarified by the OAG and determined the **Dallas County District Attorney's Office is obligated to produce the requested records.**

This includes:

- **Email communications** between DA staff and federal agencies involving me,
- **Phone communications** involving me,
- **Internal discussions** and documents tied to my employment history,
- **Any documents your office submitted to federal agencies,**
- **And any record not directly held as grand jury material** plus what was submitted

Let me be clear: As of today, you are 84 days in non-compliance. The documents you submitted on July 30 were more than 60 days past the OAG's required deadline for you to turn over these materials. You have continued to defy the OAG's order and have not produced every document to which I am entitled.

You then inadvertently closed the request without properly reviewing and fulfilling every item you were required to produce. On that same day, I took it upon myself to submit and highlight every item you failed to turn over.

As of August 15, I am submitting an additional complaint with the OAG's office, along with the documents you provided that remain out of compliance. I will also be proceeding with an additional bar grievance, as you remain in violation.

This is not a game, and it is certainly not one I am willing to participate in when the matter concerns compliance with the law. Out of courtesy, I have reattached the highlighted portions showing exactly where you are out of compliance, despite your apparent intent to continue delaying this process as though it were a game.

The information I requested is **strictly about communications, documents and records that you are required to turn over and have not**. And I expect the following questions to be answered as part of your lawful disclosure:

- **Who at your office contacted any federal agency** regarding my employment status?
- **Who specifically stated that I was not authorized** to engage in outside employment?
- **What documents did Paul Hamilton submit to the federal government.**
- **That last date and time Paul Hamilton communicated with the Federal Government.**

That line of questioning and reporting is **offensive**, inappropriate, and reflects a clear pattern of retaliatory behavior and I am not going to allow it to be buried behind a baseless grand jury excuse.

It has now been almost three months since the ruling, and your office has **failed to produce or finalize** the disclosure of the records I am legally entitled to. Your delay is a **clear violation** of Texas law and constitutes ongoing **noncompliance** with the OAG's binding legal determination. I have highlighted each section you are in violation for your intentional failure to turn over the requested documents.

Accordingly, I demand an **immediate response confirming the specific date** you intend to release the responsive records. If I do not receive the records or written confirmation of their release by **close of business this Friday**, I will promptly notify the Office of the Attorney General that your office is refusing to comply with a binding legal order.

Govern yourselves accordingly.

The purpose of this letter is to request information pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. section 552. If this information is not available from your agency, please forward this request to the appropriate agency or advise me of the other agencies which might have this information.

Please provide me with a copy of the following items: If you don't have any records you need to confirm in writing which is required.

- Email communication between Thelma Anderson and Paul Hamilton.
- Email communication from Paul Hamilton to DA staff on March 25, 2022, regarding the new policy. If you don't have any records, you need to confirm in writing which is required.
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You have exceeded the statutory timeline under **Section 552(a)(6)(A)(i)** of the Freedom of Information Act. You have now had more than **two additional months** to comply. Please provide the requested materials immediately.

Thank you for your prompt attention to this matter.

/s/Thelma Anderson

**BELOW IS A COURTESY SUBMISSION INFORMING
YOU THAT YOU DIDN'T FOLLOW THE OAG'S ORDER**

Follow-Up: Outstanding Public Records and Withheld Communications

To Whom It May Concern,

Today is Thursday August 7, 2025.

On August 1, 2025 I submitted this letter based on incomplete documents per my request where you have failed to provide. Please be advised that you have not turned over all documents required by my public records request. Specifically, the Oaths of Office for Paul Hamilton and John Creuzot both multi-term officials are still missing. These are not discretionary records. Your failure to produce them remains a direct violation of the Texas Public Information Act.

I have highlighted the materials that have been turned over, and there remains a laundry list of outstanding documents. I am requesting a detailed response indicating the following:

1. Which of the requested documents were uploaded to the portal;
2. Which documents must be picked up in person;
3. Which items remain outstanding and when they will be provided.

Additionally, your production is missing critical communications between Paul Hamilton and the federal government. Based on the documents you did provide, Paul Hamilton initiated contact with the federal government regarding me (Thelma Anderson) and Jeneba Barrie.

However, you failed to include:

- The initial communication or email sent by Paul Hamilton to federal authorities when he submitted Thelma Anderson and Jeneba Barrie;
- The date on which this outreach occurred that triggered the subsequent correspondence and you failed to identify the initial and last date of contact. The request is clear, and the OAG was even clearer.

Whether the contact was made via email, phone, online reporting form, or internal directive, it was not anonymous. It was deliberate, and it is subject to public disclosure. This communication led to the follow-up emails you did provide and is therefore part of the complete record. You are also failing to turn over the follow up communication that Paul Hamilton had when he was informed of the indictment that is not protected or privileged. All not some or what he is trying to hide.

I demand the production of that initial correspondence, including the date, method, and recipients involved. If this documentation is being withheld, today I will be notifying the Office of the Attorney General for the second time that your office is actively suppressing non-privileged again as an attempt to communication initiated by your own staff in coordination with outside federal agencies.

You have an obligation to produce these records. Speak with Mr. Hamilton and locate this communication immediately.

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ITEMS LIKE MY COMPLAINT AGAINST DREW TAYLOR MY REBUTTAL TO HIS EVALUATION AS MY CHIEF IN 2021

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Thank you for your prompt attention to this matter.

/s/Thelma Anderson

Ex. F
August 19, 2025 written rejection

✉ On 8/19/2025 11:18:40 AM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] District Attorney Information Request :: D029047-081525

Body:

August 19, 2025

RE: PUBLIC RECORDS REQUEST, Reference # D029047-081525

Dear Attorney Thellma Anderson,

On August 18, 2025, Dallas County received your request for information seeking:

“On May 23, 2025, both you and I received the Office of the Attorney General’s official determination regarding your office’s attempt to deny my access to public information under the Texas Public Information Act (OR2025-017868). The OAG expressly rejected your reliance on Section 552.103 and affirmed that, aside from materials held solely in the capacity of an agent for the grand jury, not communication, emails or documentation you submitted directly outside of the grand jury agency protection since there was a broad misinterpretation of the law that was clarified by the OAG and determined the Dallas County District Attorney’s Office is obligated to produce the requested records.

Let me be clear: As of today, you are 84 days in non-compliance. The documents you submitted on July 30 were more than 60 days past the OAG’s required deadline for you to turn over these materials. You have continued to defy the OAG’s order and have not produced every document to which I am entitled. You then inadvertently closed the request without properly reviewing and fulfilling every item you were required to produce. On that same day, I took it upon myself to submit and highlight every item you failed to turn over.

As of August 15, I am submitting an additional complaint with the OAG’s office, along with the documents you provided that remain out of compliance. I will also be proceeding with an additional bar grievance, as you remain in violation.”

Your request has been forwarded to the Civil Division of the Dallas County District Attorney’s Office for processing pursuant to the Texas Public Information Act (“TPIA”).

It appears you are not asking for new information rather informing this office you will submit a complaint with the OAG’s office regarding PIA GovQA Reference# D024997-030725.

This message is to notify you that your request (GovQA D029047-081525) is not a request for Public Information according to the TPIA. Your request has been closed.

Thank you,

Yaressy Pritchett

Paralegal

Dallas County District Attorney's Office - Civil Division, PIA Section

✉ On 8/15/2025 5:50:42 PM, DALLASCOUNTYTX Support wrote:



Dear Attorney Thellma Anderson:

Dallas County received your request for information seeking:

Records Requested: On May 23, 2025, both you and I received the Office of the Attorney General's official determination regarding your office's attempt to deny my access to public information under the Texas Public Information Act (OR2025-017868). The OAG expressly rejected your reliance on Section 552.103 and affirmed that, aside from materials held solely in the capacity of an agent for the grand jury, not communication, emails or documentation you submitted directly outside of the grand jury agency protection since there was a broad misinterpretation of the law that was clarified by the OAG and determined the Dallas County District Attorney's Office is obligated to produce the requested records.

Let me be clear: As of today, you are 84 days in non-compliance. The documents you submitted on July 30 were more than 60 days past the OAG's required deadline for you to turn over these materials. You have continued to defy the OAG's order and have not produced every document to which I am entitled. You then inadvertently closed the request without properly reviewing and fulfilling every item you were required to produce. On that same day, I took it upon myself to submit and highlight every item you failed to turn over.

As of August 15, I am submitting an additional complaint with the OAG's office, along with the documents you provided that remain out of compliance. I will also be proceeding with an additional bar grievance, as you remain in violation.

Your request will be processed in accordance with the Texas Public Information Act ("TPIA"), with full consideration of the rights and responsibilities afforded to requestors and to governmental bodies under the TPIA.

If you have any questions or concerns, please reply to this email and a Dallas County representative will respond accordingly.

Ex. G-1 to G-5

Notices of Noncompliance (emails sent):

Aug. 19 at 4:09 p.m.

Aug. 20 at 10:13 a.m.

Aug. 25 at 9:35 a.m.

Aug. 28 at 8:09 p.m.

Sept. 2 at 2:02 p.m.

--- You may respond above this line ---



August 19, 2025

RE: PUBLIC RECORDS REQUEST, Reference # D029047-081525

Dear Attorney Thellma Anderson,

On August 18, 2025, Dallas County received your request for information seeking:

"On May 23, 2025, both you and I received the Office of the Attorney General's official determination regarding your office's attempt to deny my access to public information under the Texas Public Information Act (OR2025-017868). The OAG expressly rejected your reliance on Section 552.103 and affirmed that, aside from materials held solely in the capacity of an agent for the grand jury, not communication, emails or documentation you submitted directly outside of the grand jury agency protection since there was a broad misinterpretation of the law that was clarified by the OAG and determined the Dallas County District Attorney's Office is obligated to produce the requested records.

Let me be clear: As of today, you are 84 days in non-compliance. The documents you submitted on July 30 were more than 60 days past the OAG's required deadline for you to turn over these materials. You have continued to defy the OAG's order and have not produced every document to which I am entitled.

You then inadvertently closed the request without properly reviewing and fulfilling every item you were required to produce. On that same day, I took it upon myself to submit and highlight every item you failed to turn over.

As of August 15, I am submitting an additional complaint with the OAG's office, along with the documents you provided that remain out of compliance. I will also be proceeding with an additional bar grievance, as you remain in violation."

Your request has been forwarded to the Civil Division of the Dallas County District Attorney's Office for processing pursuant to the Texas Public Information Act ("TPIA").

It appears you are not asking for new information rather informing this office you will submit a complaint with the OAG's office regarding PIA GovQA Reference# D024997-030725.

This message is to notify you that your request (GovQA D029047-081525) is not a request for Public Information according to the TPIA. Your request has been closed.

Thank you,

Notice of Noncompliance and Resubmission of Public Information Act Request

To Whom It May Concern,

This correspondence serves as a formal resubmission of my Public Information Act request, originally ordered by the Office of the Attorney General (OAG) on May 23, 2025, under OR2025-017868.

Your office has continued to withhold documents that the OAG explicitly required you to produce. You inadvertently failed to upload and provide all responsive records. Instead of correcting this omission, you have attempted to reject my request by questioning its legitimacy. Let me make this very clear:

1. This is a valid public information request.
2. The requested documents were properly identified and were already ordered to be produced by the OAG.
3. You are now 87 days past due in complying with that order.

On August 15, 2025, I resubmitted requests in an effort to correct your incomplete submission. On July 30, 2025, you intentionally closed a subsequent request without producing all documents. This is a direct violation of the OAG's order, and it has precluded my lawful access to public records.

Therefore, let me restate: This is a resubmission of my public information request for the documents you failed to turn over, which the OAG has already ordered you to release. If this request is again rejected or ignored, I will continue to escalate this matter to the OAG's enforcement division and will file additional

complaints with the State Bar of Texas regarding the attorneys involved in unlawfully withholding public records.

“You are not only acting intentionally, but are also attempting to withhold public information documents that the Office of the Attorney General has already ruled must be disclosed, in order to shield and protect prosecutors who have committed crimes while employed by the Dallas County District Attorney's Office and are still employed.”

Your office has had ample time and opportunity to comply. You are violating both the OAG's binding order and the Texas Public Information Act by failing to turn over every responsive record as required. This is a matter of public safety and you know it.

I trust I have made myself clear.

Sincerely,

Thelma Anderson

[Quoted text hidden]

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*Thelma M. Anderson B.S., M.P.A., J.D.
Attorney at Law*



Thelma Anderson ·

Mon, Aug 25, 2025 at 9:35 AM

To: Support DALLASCOUNTYTX <dallascountytx@govqa.us>, chong.choe@dallascounty.org, Cherie.batsel@dallascounty.org, Brandon.carr@dallascounty.org, Ashley.fourt@dallascounty.org, Kathryn.kraft@dallascounty.org, Joseph.lincer@dallascounty.org, Lacey.lucas@dallascounty.org, Rebecca.LUNDBERG@dallascounty.org, Thomas.MCMILLIAN@dallascounty.org, Jason.mathis@dallascounty.org, Hilary.miller@dallascounty.org, Soo.Nam@dallascounty.org, James.Palomo@dallascounty.org, Tina.patel@dallascounty.org, Courtney.parker@dallascounty.org, Clara.saafir@dallascounty.org, Jason.schuetter@dallascounty.org, Todd.sellars@dallascounty.org, Stephen.sibley@dallascounty.org, Joseph.spence@dallascounty.org, Scott.stephenson@dallascounty.org, Yaessy.Pritchett@dallascounty.org
Cc: dcjudge@dallascounty.org

Continued Notice of Non-Compliance

92 Days in Violation of OAG Order

Good Morning

This email serves as a continuation of a Notice of Non-Compliance. As of today, you are 92 days in direct violation of the Office of the Attorney General (OAG) on May 23, 2025, under OR2025-017868.

Despite my three previous Non-Compliance Notices along with a Courtesy update outlining the outstanding documents you have only produced approximately 30% of the required materials. Instead of fulfilling the OAG's order, you instructed your paralegal to close the case, fully aware that compliance had not been met, and further directed her to advise me to submit a new request an intentional tactic to delay production.

This continued failure to comply appears to be a deliberate attempt to conceal federal allegations against your superior. It is both unethical and a violation of your professional obligations as a licensed attorney in the State of Texas.

Per the OAG's order, you are still required to produce all outstanding documents. I have provided updated documentation to assist you in identifying these items. Yet you have failed to provide the required explanation for missing records and have no authority to close an open submission without compliance.

I will now proceed with filing a third Non-Compliance Complaint with the OAG, noting that you are 92 days past the compliance deadline. Moving forward, each day of continued delay will result in an updated complaint reflecting your ongoing violations.

Joseph.spence@dallascounty.org, Scott.stephenson@dallascounty.org, Yaessy.Pritchett@dallascounty.org

Cc: dcjudge@dallascounty.org

Bcc:

Date: Mon, 25 Aug 2025 09:35:35 -0500

Subject: [External Sender]Re: [Records Center] District Attorney Information Request :: D029047-081525

Continued Notice of Non-Compliance

92 Days in Violation of OAG Order

Good Morning

This email serves as a continuation of a Notice of Non-Compliance. As of today, you are 92 days in direct violation of the Office of the Attorney General (OAG) on May 23, 2025, under OR2025-017868.

Despite my three previous Non-Compliance Notices along with a Courtesy update outlining the outstanding documents you have only produced approximately 30% of the required materials. Instead of fulfilling the OAG's order, you instructed your paralegal to close the case, fully aware that compliance had not been met, and further directed her to advise me to submit a new request an intentional tactic to delay production.

This continued failure to comply appears to be a deliberate attempt to conceal federal allegations against your superior. It is both unethical and a violation of your professional obligations as a licensed attorney in the State of Texas.

Per the OAG's order, you are still required to produce all outstanding documents. I have provided updated documentation to assist you in identifying these items. Yet you have failed to provide the required explanation for missing records and have no authority to close an open submission without compliance.

I will now proceed with filing a third Non-Compliance Complaint with the OAG, noting that you are 92 days past the compliance deadline. Moving forward, each day of continued delay will result in an updated complaint reflecting your ongoing violations.

Your actions reflect a clear disregard for lawful directives, professional ethics, and your sworn oath as an attorney. Immediate compliance is expected to avoid further escalation.

Be advised of your duty and obligations.

On Aug 20, 2025, at 10:13 AM, Thelma Anderson

Notice of Noncompliance and Resubmission of Public Information Act Request

To Whom It May Concern,

This correspondence serves as a formal resubmission of my Public Information Act request, originally ordered by the Office of the Attorney General (OAG) on May 23, 2025, under OR2025-017868.

Your office has continued to withhold documents that the OAG explicitly required you to produce. You inadvertently failed to upload and provide all responsive records. Instead of correcting this omission, you have attempted to reject my request by questioning its legitimacy. Let me make this very clear:

1. This is a valid public information request.
2. The requested documents were properly identified and were already ordered to be produced by the OAG.
3. You are now 87 days past due in complying with that order.

On August 15, 2025, I resubmitted requests in an effort to correct your incomplete submission. On July 30, 2025, you intentionally closed a subsequent request without producing all documents. This is a direct violation of the OAG's order, and it has precluded my lawful access to public records.

Therefore, let me restate: This is a resubmission of my public information request for the documents you failed to turn over, which the OAG has already ordered you to release. If this request is again rejected or ignored, I will continue to escalate this matter to the OAG's enforcement division and will file additional complaints with the State Bar of Texas regarding the attorneys involved in unlawfully withholding public records.

“You are not only acting intentionally, but are also attempting to withhold public information documents that the Office of the Attorney General has already ruled must be disclosed, in order to shield and protect prosecutors who have committed crimes while employed by the Dallas County District Attorney's Office and are still employed.”

Your office has had ample time and opportunity to comply. You are violating both the OAG's binding order and the Texas Public Information Act by failing to

turn over every responsive record as required. This is a matter of public safety and you know it.

I trust I have made myself clear.

Sincerely,

Thelma Anderson

On Tue, Aug 19, 2025 at 11:19 AM DALLASCOUNTYTX Support <dallascountytx@govqa.us> wrote:

--- You may respond above this line ---



August 19, 2025

RE: PUBLIC RECORDS REQUEST, Reference # D029047-081525

Dear Attorney Thellma Anderson,

On August 18, 2025, Dallas County received your request for information seeking:

“On May 23, 2025, both you and I received the Office of the Attorney General’s official determination regarding your office’s attempt to deny my access to public information under the Texas Public Information Act (OR2025-017868). The OAG expressly rejected your reliance on Section 552.103 and affirmed that, aside from materials held solely in the capacity of an agent for the grand jury, not communication, emails or documentation you submitted directly outside of the grand jury agency protection since there was a broad misinterpretation of the law that was clarified by the OAG and determined the Dallas County District Attorney’s Office is obligated to produce the requested records.

Let me be clear: As of today, you are 84 days in non-compliance. The documents you submitted on July 30 were more than 60 days past the OAG’s required deadline for you to turn over these materials. You have continued to defy the OAG’s order and have not produced every document to which I am entitled.

You then inadvertently closed the request without properly reviewing and fulfilling every item you were required to produce. On that same day, I took it upon myself to submit and highlight every item you failed to turn over.

As of August 15, I am submitting an additional complaint with the OAG’s office, along with the documents you provided that remain out of compliance. I will also be proceeding with an additional bar grievance, as you remain in violation.”

Your request has been forwarded to the Civil Division of the Dallas County District Attorney's Office for processing pursuant to the Texas Public Information Act ("TPIA").

It appears you are not asking for new information rather informing this office you will submit a complaint with the OAG's office regarding PIA GovQA Reference# D024997-030725.

This message is to notify you that your request (GovQA D029047-081525) is not a request for Public Information according to the TPIA. Your request has been closed.

Thank you,

Yaessy Pritchett
Paralegal
Dallas County District Attorney's Office - Civil Division, PIA Section

To monitor the progress or update this request please log into the [Dallas County Public Records Center](#)



--

*Thelma M. Anderson B.S., M.P.A., J.D.
Attorney at Law*

<81925 FOIA THELMA ANDERSON RESUBMISSION.pdf>

This message came from outside of Dallas County Government. Please be thoughtful before you click a link or provide your login information!

Mon, Aug 25, 2025 at 10:01 AM

Clara.saafir@dallascounty.org, Jason.schuette@dallascounty.org, Todd.sellars@dallascounty.org,
Stephen.sibley@dallascounty.org, Joseph.spence@dallascounty.org, Scott.stephenson@dallascounty.org,
Yaessy.Pritchett@dallascounty.org
Cc: dcjudge@dallascounty.org

Good Evening,

Per the paralegal email she stated she was forwarding the overdue OAG order over to the **Dallas County District Attorney Civil Division**. Your latest claim that you “turned over everything” is still false. We both read the Texas OAG order. It requires full production of the remaining submitted information. Yet you continue to stall, re-route, and drip-feed partial records while instructing staff to “close” requests that are not complete. Forwarding my overdue request. You have had an additional 26 days to ensure compliance, yet you still have not sent the remaining documents. Instead, you continue to reject resubmission and misrepresent that you have turned over the required documents, which you have not. **Until the prosecutor responsible for complying with the OAG’s order is identified, I will continue notifying your office to determine who is accountable for the failure to produce the ordered records so I can properly name the correct individuals in my complaint. Your continued refusal to turn over the records is a clear violation of the Texas Public Information Act (Tex. Gov’t Code ch. 552) and the OAG’s binding order including the duties in §§ 552.221 and 552.301 and is subject to enforcement and remedies under §§ 552.321 and 552.3215**

[Quoted text hidden]

 **82825 OAG Noncompliance Letter.pdf**
141K

Thelma Anderson

Tue, Sep 2, 2025 at 2:02 PM

To: Support DALLASCOUNTYTX <dallascountytexas@govqa.us>, chong.choe@dallascounty.org,
Cherie.batsel@dallascounty.org, Kathryn.kraft@dallascounty.org, Joseph.lincer@dallascounty.org,
Lacey.lucas@dallascounty.org, Rebecca.LUNDBERG@dallascounty.org, Thomas.MCMILLIAN@dallascounty.org,
Jason.mathis@dallascounty.org, Hilary.miller@dallascounty.org, Soo.Nam@dallascounty.org,
James.Palomo@dallascounty.org, Tina.patel@dallascounty.org, Clara.saafir@dallascounty.org,
Jason.schuette@dallascounty.org, Todd.sellars@dallascounty.org, Stephen.sibley@dallascounty.org,
Joseph.spence@dallascounty.org, Scott.stephenson@dallascounty.org, Yaessy.Pritchett@dallascounty.org
Cc: dcjudge@dallascounty.org

Good Afternoon,

I am following up on the email I sent on August 28, 2025, regarding the outstanding records that were ordered to be produced by the Office of the Attorney General’s ruling dated May 23, 2025. To date, your office has not complied with the order, nor have I received a response to my prior correspondence.

What is the status of these records and confirm when full compliance will occur?.,I' As more than three months have passed since the ruling, your continued delay constitutes noncompliance with the Attorney General’s order.

I look forward to your prompt response.

Respectfully,

Ex. H
TPIA REQUEST 2022
THAT WAS TURNED OVER
SOME REQUEST MIRROR THE CURRENT
REQUEST THAT THEY REFUSE TO TURN OVER



JOHN CREUZOT
DALLAS COUNTY
CRIMINAL DISTRICT ATTORNEY
CIVIL DIVISION

May 10, 2022

Via GovQA Portal

Attorney Thelma Anderson

Re: **PIA: Thelma Anderson – emails and employee file**
GovQA Reference # D005017-042622

Dear Attorney Thelma Anderson,

On April 26, 2022, Dallas County received a request for public information via the GovQA portal seeking:

Please limit your search of the above item(s) to the period from September 01, 2021 to March 25, 2022.

- *Email communication between Thelma Anderson and Paul Hamilton.*
- *Email communication between Thelma Anderson and Jennifer Faulk.*
- *Email and Microsoft Teams communication between Thelma Anderson and Drew Taylor.*
- *Email communication between Thelma Anderson and Rhonda Frosch.*
- *Email communication between Thelma Anderson and Glen Fitzmartin.*
- *Email communication between Thelma Anderson and Brandon Denson.*

July 1, 2021-March 25, 2022

- *Email communication between Thelma Anderson and Jennifer Faulk.*
- *Email and Microsoft Teams communication between Thelma Anderson and Drew Taylor.*

Copy of Thelma Anderson employee file

Your request has been forwarded to the Civil Division of the Dallas County District Attorney's Office for processing pursuant to the Texas Public Information Act ("TPIA").

The Dallas County District Attorney's Office – Criminal Division ("DA-Criminal Division") and the Dallas County Human Resource Department ("HR Department") were consulted regarding your request. Both Departments made a good faith effort to relate your request to information collected, assembled, and maintained by Dallas County and performed a diligent search for the records you seek.

COST ESTIMATE

Sections 552.261 through 552.275 of the TPIA generally provide for the allowable charges for copies of and access to public information. All charges must be calculated in accordance with the rules promulgated by the Texas Attorney General. See 1 T.A.C. §§70.1-.13.

In accordance with the applicable provisions of the TPIA and chapter 70 of the Texas Administrative Code, below is a list of the estimated charges for providing the information you have requested. The itemized estimate of charges computes labor charges at the statutory rate of \$15.00 per hour.

CHARGES:

Labor: Employee file only

a. Identify, locate, and compile responsive docs (45 minutes @\$15.00/hr)	\$ 11.25
b. Overhead (20%)	\$ 2.25
c. Copies 160 pages (@ \$.10/page)	\$ 16.00
TOTAL:	\$ 29.50

Payment in full will be required and must be received prior to the release of the requested information. Payment may be submitted at <https://www.dallascounty.org/dcda/>. For your convenience, the reference number is included in the subject line of this letter. Please upload receipt for proof of payment to the GovQA portal for processing. Upon receipt of full payment, please allow a reasonable amount of time, no less than ten (10) business days, not including county holidays, for the requested information to be compiled and prepared for delivery to you. Please be advised that Convenience Fees are charged and collected by JPMorgan and are non-refundable:

Credit Card Fee = 2.15% of amount charged (minimum of \$2.95)

Debit Card Fee = \$2.95 per transaction

You may also issue payment in the form of a cashier's check or money order made payable to Dallas County, no personal checks accepted. If submitting a cashier's check or money order, please mail your payment to the Dallas County District Attorney's Office—Civil Division, located at 500 Elm Street, Suite 6300, Dallas, TX 75202. Please include the reference Thelma Anderson - D005017-042622 in the memo line of your payment. Upon receipt of full payment, please allow a reasonable amount of time, no less than ten (10) business days, not including county holidays, for the requested information to be compiled and prepared for delivery to you.

Upon receipt of full payment, the DA – Civil Division will prepare the records responsive to your request for pick up. Please bring a form of a state issued identification in order to retrieve documents that require a special right of access.

You may pick up the responsive information at:

Dallas County District Attorney's Office – Civil Division

500 Elm Street, Suite 6300, Dallas, TX 75202

Monday – Friday between 8am – 4:30pm, not including county holidays

Dallas County has determined that information responsive to your request (employee file) includes confidential information which requires a special right of access as per Section 552.023 of the TPIA. Pursuant to Section 552.229(a) of the TPIA, "Consent for the release of information excepted from disclosure to the general public but available to a specific person under Sections

552.023 and 552.307 must be in writing and signed by the specific person or person's authorized representative."

Regarding the part of your request which seeks "*email communications and Teams Communications*," as written, your request does not include enough description and detail of the requested information to allow Dallas County to accurately identify and locate the information or documents you seek. As such, Dallas County is unable to process your request pursuant to the TPIA with full consideration of the rights and responsibilities afforded to requestors and governmental bodies under the TPIA. I write seeking clarification of your request pursuant to Texas Government Code §552.222. In order to narrow your request, please include keywords regarding the email and teams communications you seek.

You may submit your written clarification via mail, fax, or via electronic mail as a reply to this message. Once our office receives your clarification, we will proceed to the next step in processing your request. Pursuant to Texas Government Code §552.222, if our office does not hear from you in writing within sixty-one (61) days, your PIA request will be considered withdrawn.

Thank you for your prompt attention to this matter.

Sincerely,



Yaressy Pritchett
Paralegal
Dallas County District Attorney's Office
Civil Division

[Records Center] Dallas County Department Request :: D005017-042622

2 messages

DALLASCOUNTYTX Support <dallascountytx@govqa.us>

Tue, May 10, 2022 at 2:03 PM

Attachments:

[5.10.22_Cost-Clarification_Letter_-_Anderson_GovQA_D005017-042622.pdf](#)

--- You may respond above this line ---



Dear Attorney Thelma Anderson,

Please see attached correspondence regarding your Texas Public Information Act request.

Thank you,

Yaressy Pritchett
Paralegal
Dallas County District Attorney's Office - Civil Division, PIA Section

To monitor the progress or update this request please log into the [Dallas County Public Records Center](#)



Tue, Jun 7, 2022 at 1:30 PM

To: DALLASCOUNTYTX Support <dallascountytx@govqa.us>

Good Afternoon,

To clarify the portion of the request that needed specification. I'm requesting all email and teams communication for the identified individuals.

thank you,

[Quoted text hidden]

--



Public Information Act Request :: D005017-042622

1 message

DALLASCOUNTYTX Support <dallascountytx@govqa.us>

Tue, Apr 26, 2022 at 3:24 PM

Dear Attorney Thellma Anderson:

Dallas County received your request for information seeking:

Records Requested: Please limit your search of the above item(s) to the period from September 01, 2021 to March 25, 2022. Email communication between Thelma Anderson and Paul Hamilton. Email communication between Thelma Anderson and Jennifer Faulk. Email and Microsoft Teams communication between Thelma Anderson and Drew Taylor. Email communication between Thelma Anderson and Rhonda Frosch. Email communication between Thelma Anderson and Glen Fitzmartin. Email communication between Thelma Anderson and Brandon Denson. July 1, 2021-March 25, 2022 Email communication between Thelma Anderson and Jennifer Faulk. Email and Microsoft Teams communication between Thelma Anderson and Drew Taylor. Copy of Thelma Anderson employee file.

Your request will be processed in accordance with the Texas Public Information Act ("TPIA"), with full consideration of the rights and responsibilities afforded to requestors and to governmental bodies under the TPIA.

If you have any questions or concerns, please reply to this email and a Dallas County representative will respond accordingly.

Thank you,
Yaressy Pritchett
Paralegal
Dallas County District Attorney's Office -- Civil Division

To monitor the progress or update this request please log into the [Dallas County Public Records Center](#)



D005017-042622 - Dallas County Department Request

Message History (8)

✉ On 7/1/2022 8:17:34 AM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] Dallas County Department Request :: D005017-042622

Body: Dear Attorney Thelma Anderson,

We have received your payment of \$45.75 indicating that you are wanting in person inspection of records. Please be advised that the documents contain information that may be confidential and subject to permissive and mandatory exceptions under the Texas Public Information Act, including the attorney client privilege. Are you available to come in person to inspect responsive records on Tuesday, July 5, 2022 @ 10:00am? If you decide you want copies, the cost is 10 cents per page. Our office can accept cashier's check, money order, or cash for the copies you wish to be made. If paying by cash, we can only accept exact change. We are located at Records Building, 500 Elm Street, Suite 6300, Dallas, Texas 75202.

Thank you,

Yaressy Pritchett
Paralegal
Dallas County District Attorney's Office - Civil Division, PIA Section

✉ On 6/29/2022 4:05:19 PM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] Dallas County Department Request :: D005017-042622

Body: Dear Attorney Thelma Anderson,

This is in response to your email dated 6/17/2022 regarding your inquiry about "price reduction options." Please see attached cost letter detailing the least expensive option (in person inspection of records) for your request. If you decide you want copies, the cost is 10 cents per page. This would apply to both the email communications and your employee file. Please clarify if you are wanting to inspect records in person or receive responsive records electronically via the GovQA portal.

Clarification is sought pursuant to §552.222 of the TPIA. You may submit your written clarification via reply to this email. Once our office receives your clarification, we will proceed to the next step in processing your request. Pursuant to §552.222, if our office does not hear from you in writing within sixty-one (61) days, your request will be considered withdrawn.

Thanks,

Yaressy Pritchett
Paralegal
Dallas County District Attorney's Office - Civil Division, PIA Section

← On 6/17/2022 5:01:52 PM, Thellma Anderson wrote:

TO: "DALLASCOUNTYTX Support"[dallascountytx@govqa.us]

Hello,

What are the prices reduction options? These emails pertain information regarding my former employment.

On Jun 17, 2022, at 4:07 PM, DALLASCOUNTYTX Support wrote:

Attachments:

6.17.22_Cost_Letter_-_Anderson_GovQA_D005017-042622.pdf

✉ On 6/17/2022 4:06:48 PM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] Dallas County Department Request :: D005017-042622

Body: Dear Attorney Thelma Anderson,

Please see attached cost letter regarding your Texas Public Information Act request.

Thank you,

Yaressy Pritchett

Paralegal

Dallas County District Attorney's Office - Civil Division, PIA Section

← On 6/7/2022 1:32:27 PM, Thellma Anderson wrote:

TO: "DALLASCOUNTYTX Support"[dallascountytx@govqa.us]

Good Afternoon,

To clarify the portion of the request that needed specification. I'm requesting all email and teams communication for the identified individuals.

thank you,

On Tue, May 10, 2022 at 2:03 PM DALLASCOUNTYTX Support wrote:

Attachments:

5.10.22_Cost-Clarification_Letter_-_Anderson_GovQA_D005017-042622.pdf

✉ On 5/10/2022 2:02:45 PM, DALLASCOUNTYTX Support wrote:

Subject: [Records Center] Dallas County Department Request :: D005017-042622

Body: Dear Attorney Thelma Anderson,

Please see attached correspondence regarding your Texas Public Information Act request.

Thank you,

Yaressy Pritchett

Paralegal

Dallas County District Attorney's Office - Civil Division, PIA Section

✉ On 4/26/2022 3:23:14 PM, DALLASCOUNTYTX Support wrote:



Dear Attorney Thelma Anderson:

Dallas County received your request for information seeking:

Records Requested: Please limit your search of the above item(s) to the period from September 01, 2021 to March 25, 2022.

Email communication between Thelma Anderson and Paul Hamilton.
Email communication between Thelma Anderson and Jennifer Faulk.
Email and Microsoft Teams communication between Thelma Anderson and Drew Taylor.
Email communication between Thelma Anderson and Rhonda Frosch.
Email communication between Thelma Anderson and Glen Fiztmartin.
Email communication between Thelma Anderson and Brandon Denson.

July 1, 2021-March 25, 2022

Email communication between Thelma Anderson and Jennifer Faulk.
Email and Microsoft Teams communication between Thelma Anderson and Drew Taylor.

Copy of Thelma Anderson employee file.

Your request will be processed in accordance with the Texas Public Information Act ("TPIA"), with full consideration of the rights and responsibilities afforded to requestors and to governmental bodies under the TPIA.

If you have any questions or concerns, please reply to this email and a Dallas County representative will respond accordingly.

Thank you,

Yaressy Pritchett

Paralegal

Dallas County District Attorney's Office -- Civil Division

To monitor the progress or update this request please log into the [Dallas County Public Records Center](#)



 On 4/26/2022 3:23:12 PM, DALLASCOUNTYTX Support wrote:

Request was created by staff

Ex. J

DA's Letters to the OAG



JOHN CREUZOT
DALLAS COUNTY
CRIMINAL DISTRICT ATTORNEY
CIVIL DIVISION

March 24, 2025

Via Electronic Filing

Honorable Ken Paxton
Office of the Attorney General
Open Records Division
P.O. Box 12548
Austin, TX 78711-2548

Re: **PIA Thelma Anderson– Request Pertaining to Employee File, email communication, etc.**
Our reference # D024997-030725

Dear Sir:

On Monday, March 10, 2025, Dallas County Criminal District Attorney's Office ("Dallas County DA's Office") received a Texas Public Information Act request from Thelma Anderson. The request was submitted after business hours on Friday, March 7, 2025, via the GovQA public records portal (web-based records management platform). The request, submitted by a former Dallas County Assistant District Attorney, seeks email communication and other items pertaining to her employment history with Dallas County. *See Exhibit A.*

The Dallas County DA's Office timely requests a decision from your Office.

The Dallas County DA's Office seeks your opinion regarding the disclosure of some of the requested information that may be subject to one or more of the exceptions set forth in §552.026, and §§552.101 through 552.162 of the Texas Public Information Act, including the confidentiality provisions contained in other applicable constitutional or statutory provisions, laws, or judicial decisions.

The Dallas County DA's Office will submit comments to your Office as soon as possible regarding the applicability of the listed exceptions.

If you have any additional questions, please do not hesitate to contact me.

Sincerely,

Raven Williams
Assistant District Attorney
Dallas County District Attorney's Office
Civil Division

Enclosure



JOHN CREUZOT
DALLAS COUNTY
CRIMINAL DISTRICT ATTORNEY
CIVIL DIVISION

April 1, 2025

Via Electronic Filing

Honorable Ken Paxton
Office of the Attorney General
Open Records Division
P.O. Box 12548
Austin, TX 78711-2548

Re: **PIA Thelma Anderson – Request Pertaining to Employee File, email communication, etc.**
Our reference # D024997-030725/ OAG Tracking ID: OR25012174

Dear Sir:

On Monday, March 10, 2025, Dallas County Criminal District Attorney's Office ("Dallas County DA's Office") received a Texas Public Information Act request from Thelma Anderson. The request was submitted after business hours on Friday, March 7, 2025, via the GovQA public records portal (web-based records management platform). The request, submitted by a former Dallas County Assistant District Attorney, seeks email communication and other items pertaining to her employment history with Dallas County. *See Exhibit A.*

Dallas County was closed in observance of the Cesar Chavez Holiday on March 31, 2025.

In accordance with §552.301(e), enclosed please find a representative sample of records that the Dallas County DA's Office seeks to except from disclosure in the above-referenced matter. This letter also serves to supplement and clarify arguments based on our original letter **dated March 24, 2025**, which was sent within 10 days of receipt of the request (OAG Tracking ID: OR25012174).

The Dallas County DA's Office seeks to protect from disclosure the information enclosed herein as Exhibit C. The Dallas County DA's Office asserts that the attached information is confidential under Texas Government Code §552.103 – Litigation or Settlement Negotiations involving a State or a Political Subdivision.

Based on the arguments set forth below, the Dallas County DA's Office seeks a decision from your Office as to whether the requested information is excepted from required public disclosure under the PIA.

ARGUMENT

- I. Information Sought is Protected from Disclosure under Texas Government Code §552.103 – Litigation or Settlement Negotiations Involving the State or a Political Subdivision**

Exhibit C consists of a representative sample of certain email communications that include current employees and/or officials alleged to be related to claims regarding Requestor's employment while employed with Dallas County, as well as documents that should normally be requested via the discovery process. Specifically, the requestor seeks email correspondence between Dallas County employees and "[t]he FBI, Homeland Security, DEA, IRS, CIA or Department of Justice (DOJ) pertaining to Thelma Anderson employment history with the Dallas County District Attorney's Office[,]” copies of oaths of office and employee policies. *See* Exhibit A. Dallas County DA's Office asserts that the requested information is related to the subject matter regarding the impending alleged litigation filed by the requestor. Therefore, Dallas County DA's Office respectfully requests a ruling that the information submitted in Exhibit C is excepted from disclosure under Section 552.103(a). *See ORD 551 (1990)*. Accordingly, Dallas County DA's Office should be permitted to withhold the information under Section 552.103(a).

REQUESTED ACTION

In sum, Dallas County DA's Office respectfully requests your office's determination as to whether the Dallas County DA's Office may withhold the information included in Exhibit C pursuant to the Texas Public Information Act. If you have any questions or need additional information, please do not hesitate to contact me at (214) 653-7358. Thank you for your consideration of this matter.

Sincerely,



Chong Choe
Assistant District Attorney
Dallas County District Attorney's Office
Civil Division

Enclosure

cc (without enclosure):

Thelma Anderson– Requestor

Section 552.103 of the Government Code provides as follows:

(a) Information is excepted from the requirements of Section 552.021 if it is information relating to litigation of a civil or criminal nature to which the state or a political subdivision is or may be a party or to which an officer or employee of the state or a political subdivision, as a consequence of the person's office or employment, is or may be a party.

(b) For purposes of this section, the state or a political subdivision is considered to be party to litigation of a criminal nature until the applicable statute of limitations has expired or until the defendant has exhausted all appellate and postconviction remedies in state and federal court.

(c) Information relating to litigation involving a governmental body or an officer or employee of a governmental body is excepted from disclosure under Subsection (a) only if the litigation is pending or reasonably anticipated on the date that the requestor applies to the officer for public information for access to or duplication of the information. Tex. Gov't Code § 552.103(a), (c).

In order to show the Section 552.103(a) exception is applicable in a particular situation, the governmental body must show the following: (1) litigation was pending or reasonably anticipated on the date the governmental body received the request for information, and (2) the information at issue is related to that litigation. *See Univ. of Tex. Law Sch. v. Tex. Legal Found.*, 958 S.W.2d 479, 481 (Tex. App.—Austin 1997, orig. proceeding); *Heard v. Houston Post Co.*, 684 S.W.2d 210, 212 (Tex. App.—Houston [1st Dist.] 1984, writ ref'd n.r.e.); *Tex. Att'y Gen. ORD No. 551 at 4 (1990)*. The question of whether litigation is reasonably anticipated must be determined on a case-by-case basis. *See Open Records Decision No. 452 at 4 (1986)*. The governmental body must provide “concrete evidence showing that the claim that litigation may ensue is more than mere conjecture.” *Id.* Concrete evidence to support a claim that litigation is reasonably anticipated may include, for example, the governmental body's receipt of a letter containing a specific threat to sue the governmental body from an attorney for a potential opposing party. *See Open Records Decision No. 555 (1990)*; *see also Open Records Decision No. 518 at 5 (1989)* (litigation must be “realistically contemplated”). Further, information relevant to a pending discrimination complaint may be withheld from disclosure under the litigation exception. *See Open Records Decision No. 466 at 1 (1982)*.

As concrete evidence that litigation is reasonably anticipated as of the date of requestor's request, Dallas County notes a press conference that requestor livestreamed online on March 18, 2025, during which the requestor stated that she was “filing suit against the Dallas County District Attorney's Office, Paul Hamilton and . . . John Creuzot for one hundred million dollars.” (0:00:40) The press conference may be observed online at <http://www.youtube.com/watch?v=giziG2MM5bM>. The requestor stated that she was alleging “defamation, slander, libel, tortious interference and intentional infliction of emotional distress.” (0:23:29) The requestor further confirmed after being asked during a question and answer session toward the end of the press conference that the lawsuit has been filed. (0:40:40) *See Exhibit B*. Dallas County DA's Office respectfully requests a decision from your office that Dallas County DA's Office may withhold the responsive information under Section 552.103(a).

There are two requirements for information to be excepted from public disclosure by Section 552.103(a): (1) litigation involving the governmental body must be pending or reasonably anticipated, and (2) the information must relate to that litigation. Therefore, a governmental body that seeks an Attorney General decision has the burden of clearly establishing both prongs of this test. Section 552.103(a) was intended to prevent the use of the Act as a method of avoiding the rules of discovery used in litigation. *See Attorney General Opinion JM-1048 (1989)*.

**DALLAS COUNTY PUBLIC INTEGRITY COMPLAINT
DALLAS COUNTY**

SERVICE CASE NUMBER: _____
(For Office Use Only)

DA NUMBER: _____
(For Office Use Only)

RETURN TO:
PUBLIC INTEGRITY DIVISION
Frank Crowley Courts Building
133 North Riverfront Blvd., LB19
Dallas, Texas 75207-4399
214.653.3714

John Creuzot
CRIMINAL DISTRICT ATTORNEY
DALLAS COUNTY, TEXAS

COMPLAINT FORM

This complaint form is provided to you with the understanding that this office may conduct investigations to determine if a firm or person is in violation of Penal Laws of the State of Texas. We strongly recommend that you consult with your own private attorney to determine your legal rights and civil remedies in this matter.

(PLEASE TYPE OR PRINT)

I. INFORMATION ABOUT THE PERSON OR PARTY YOU ARE COMPLAINING OF:

Paul Hamilton

Full Name

133 N Riverfront Blvd Dallas Tx 75207

Address (Street, City, State, Zip)

Telephone **214-653-3600**

B RACE: _____ **M** SEX: _____ HT: _____ WT: _____ HAIR: _____ EYES: _____

: _____ DATE OF BIRTH: _____ OR) APPROXIMATE AGE: _____

II. INFORMATION ABOUT YOU:

1. **Thelma Anderson**

Your Full Name (and Company Name if Applicable)

3416 Country Club Dr W 122 Irving TX 75038

Address (Street, City, State, Zip)

439613441

Social Security Number

318-572-0332

Telephone Numbers (Office & Home)

III. WITNESS INFORMATION:

1. WITNESS: Katherine Schwethelm Special Agent

Name

**1100 Commerce St., Third Floor
Dallas, TX 75242-1699 817-320-4376**

Address and Telephone

2. WITNESS: Michelle Winters AUSA

Name

**1100 Commerce St., Third Floor
Dallas, TX 75242-1699**

Address and Telephone

IV. INFORMATION ABOUT OFFENSE:

1. Date of offense: 8/22 10/28/22 11/1/22
1/23-25/2023

Where did offense occur:

Paul Hamiltons Office and 1100 Commerce St., Third Floor
Dallas, TX 75242-1699

DPD, Texas Rangers

2. What other agencies have you complained to:

3. Have you complained to the person: Their reply: **No because this individual will lie and attempt to destroy evidence, cover up his crimes, miscodnuct and out of fear for my life.**

4. **Please include copies of any related documents.**

**Criminal and Misconduct Complaint Against Paul Hamilton,
First Assistant District Attorney**

I am formally submitting this complaint to request a criminal and misconduct investigation **under seal**, into the actions of Paul Hamilton, First Assistant District Attorney for Dallas County. The evidence outlined below demonstrates a deliberate pattern of misrepresentation, abuse of authority, retaliation, and deception of federal officials that rises to the level of both professional misconduct and potential criminal conduct.

Timeline of Events

- **August 11, 2022** – Texas Workforce Commission Appeals Hearing held. Paul Hamilton made several admissions during the hearing, but later provided false statements to federal agents, prosecutors, and under oath.
- **August 2022** – Hamilton used his position as First Assistant DA to contact the federal government and submit a false complaint against myself and another Black prosecutor. This was an abuse of official capacity and an act of discriminatory targeting.
- **October 28, 2022** – Documentation received via email confirms Hamilton had been contacted by the federal government and received a subpoena to appear in court.
- **November 1, 2022** – Paul Hamilton testified under oath before the federal grand jury, where he committed perjury, a federal crime. His testimony included false statements regarding my outside employment and his authority under office policy; despite knowing he lacked contemporaneous knowledge and supervisory authority.
- **January 23, 2023** – Federal agents questioned Hamilton regarding my employment, outside business activity, and DA’s Office policy. Hamilton claimed: I never submitted or received authorization for outside employment; I was prohibited from outside employment under office policy; Policies were loosely enforced until “issues” with me came to light. He attached a Professional Responsibility Review Policy dated February 13, 2020.
- **January 25, 2023** – The AUSA requested clarification on the policy’s effective date and updates. Hamilton responded: The policy manual was last updated in January 2019; All employees signed off on the manual under the new administration; He joined the office in February 2019; The only change regarding outside employment occurred after I left and would not apply to me.

Additional Misrepresentation

- False Position Claim – Hamilton falsely represented to federal agents that he was the First Assistant during the relevant time periods 2016-2019. In fact, Kevin Brooks was the First Assistant until 2020; Hamilton did not assume the role until mid-2020. At the time in question, Hamilton was neither my immediate supervisor nor authorized to make determinations regarding outside employment under Policy 2.19. My business was already in operation prior to Hamilton’s employment and prior to becoming First Assistant. Nevertheless, Hamilton lied to the federal agent, under oath, and to the AUSA, falsely claiming authority he did not possess.

On **January 24, 2023**, Paul Hamilton in black and white stated to the Federal Agent: Addressing your questions, **Ms. Anderson did not submit any requests nor did she receive any authorization to take on outside employment during her time with us.** Yes, she was prohibited from having outside employment while with the office without express authorization. See Policy Manual Sec. 2.19 and Sec. 2.20, the latter specifically prohibiting the **outside practice of law. This employment policy was loosely enforced until many of the issues and complication raised by her activities came to light.** Mr. Hamilton's duty began when he was promoted to First Assistant mid 2020. At that point, he failed to update or properly implement office policies which, by his own admission, were **"loosely enforced" under his tenure as the first assistant.** The outside employment policy was not updated until **March 25, 2022, after he wrongfully terminated me without following the required policy and procedures stating I was the sacrificial lamb.** This failure was confirmed by the **Texas Workforce Commission**, which ruled that I was wrongfully terminated. More specifically, the Commission found that following our meeting in his office on **October 22, 2021**, Mr. Hamilton had a duty and responsibility under policy to follow up with me regarding the changes he requested be made to my website. His failure to follow up for more than six months constituted a violation of the policy not on the part of the employee, but on the part of Mr. Hamilton. During the hearing, Mr. Hamilton attempted to excuse this failure by stating that he had "500+ employees to look after" and could not focus on me. He intentionally didn't disclose this to federal agents when asked several times.

Mr. Hamilton's vendetta against me for losing the unemployment hearing became active shortly thereafter. This is confirmed by the fact that in **August 2022**, soon after he lost the hearing, he launched his scheme to defraud the federal government in retaliation against two former prosecutors. From his own statements, it is clear that he ultimately carried out this scheme by lying to the federal government, which culminated in his testimony under federal grand jury subpoena.

During that testimony, Mr. Hamilton **intentionally misrepresented his authority, misrepresented the policy, and falsely claimed that I was prohibited and not authorized to operate my business, work for New York & Company, or try a civil case** all activities that predated both his employment and his tenure as First Assistant. He **used his title, county resources, county time, and county email to legitimize his plot**, exploiting the power and credibility of his public office to manufacture legitimacy for his lies and he almost got away with it.

This was not merely poor judgment; it was a **deliberate abuse of power and unethical misuse of public office**, designed to settle a personal vendetta through fraud, retaliation, and deception at the federal level. This hearing is documented with the Texas Workforce Commission through Audio recording that will confirm that he intentionally lied to the federal government and failed to retract his misrepresentation which is required through his oath as a prosecutor, his oath as a lawyer and the oath he took when he testified before the federal grand jury.

Tell A Lawyer Misrepresentation and Retaliation – Hamilton misled federal agents into believing I was terminated because I was prohibited from outside employment and not authorized to operate Tell A Lawyer. This was false when Hamilton had personally granted me permission to continue operating Tell A Lawyer during our October 15, 2021, meeting, instructing only that disclaimers be placed on the website. **In the memo that Paul Hamilton wrote he stated the following: I advised Ms. Anderson that it appeared completely to the contrary, and that if her assertion were true, then she needed to make it clear on the opening page of the site, and on each substantive page thereafter, that no legal services are solicited, offered or provided. Ms. Anderson's activities in these regards will be monitored for compliance with office policy as well as the discussion of the date referenced.**

Does this memo prohibit or revoke my authorization?

Absolutely not. Paul Hamilton later told the federal government I was **prohibited** and **not authorized** to operate my business. But his own memo says the opposite.

What his memo actually does

- **Gives conditions, not a ban.** It says “*if [your assertions] were true, then [you] needed to make it clear... that no legal services are solicited, offered, or provided.*” That is a **content-disclaimer requirement**, not a prohibition.
- **Affirms continued operation with safeguards.** Directing me to add disclaimers presumes I may **continue operating** so long as the site is properly labeled.
- **Promises monitoring—not shutdown.** “*Ms. Anderson’s activities... will be monitored for compliance with office policy.*” **Monitoring** equals oversight of ongoing activity, not a revocation or suspension.
- **No prohibitory language anywhere.** The memo contains **no** verbs like “prohibit,” “revoke,” “suspend,” “cease,” or “terminate,” and **no effective date** or remedial sanction typical of an actual ban.
- **No policy mechanism invoked.** It does **not** cite or execute any revocation procedure (e.g., written notice from the proper supervisor under Policy 2.19). **No written prohibition** was issued.
- **Structure = conditional compliance.** The “if/then” structure creates a **path to compliance**, not an order to stop. It treats the issue as a **clarification** problem (disclaimers), not an authorization problem.

Omitted Facts Termination Memo

Paul Hamilton’s **post-termination memo rewrites the rules.** It **contradicts** his own instructions from **October 15, 2021**, and the **October 22, 2021**, follow-up, and it **omits** the fact that his October directive **did not prohibit or revoke** my authorization; it required disclaimers and promised monitoring. He also fails to disclose that on **December 15, 2021**, he knew his boss, **District Attorney John Creuzot**, had viewed my LinkedIn page proof they were actively monitoring my activity and had a **reasonable opportunity to confer** with me, yet **failed to follow up.**

Why this matters

- **Contradiction**: October = **disclaimers + monitoring** (conditional permission). The later memo pretends October was “**not permitted/cease.**”
- **Omission of duty**: After directing website changes, Hamilton had a **policy duty to review within a reasonable time**; he did not.
- **Knowledge & opportunity**: The 12/15/2021 LinkedIn view shows awareness and monitoring; still **no engagement** or written prohibition.
- **Shifted blame**: The later memo **erases his own obligations** and **pushes responsibility onto the employee**, despite the paper trail.
- **Ethical & oath failures**: This pattern highlights Hamilton’s **discrepancies, failure to follow policy, lack of follow-up,** and **breaches of his ethical duties, his oath of office, and his oath as a lawyer** culminating in **false statements to the federal government.**

Federal misrepresentation pattern

- In the post-termination memo, Hamilton **never mentions his instruction regarding Tell A Lawyer** and that I was never prohibited and not authorized to operate Thelma Lou yet later **told federal agents and the grand jury** that I was **prohibited and not authorized** to operate.
- That claim **directly conflicts and contradicts** with his October instruction (disclaimers + monitoring) and his failure to issue any written prohibition or revocation under policy which is nowhere to be found because I was never prohibited and not authorized.
- The inconsistency is **egregious** and supports an inference of **intentional misrepresentation** to conceal his policy failures leading to misleading the federal government and committing perjury.

Bottom line: The post-termination memo is a **post-hoc cover-up** narrative that contradicts the October record, **omits material facts,** and **conceals Hamilton’s own policy violations** to justify a result he never stated to me which I was required to have notice.

This is confirmed in my **audio recording of my termination meeting with Mr. Hamilton.** I anticipated that Mr. Hamilton would lie and use his position to **gaslight, manipulate, and legitimize his unethical behavior,** which is exactly what he attempted to do. He acted under the guidance and protection of **District Attorney John Creuzot, who promoted him to shield and cover up his misconduct.** I had to protect myself, and if I had not recorded him, **he would have gotten away with his crimes.** The audio proves that Mr. Hamilton deliberately used his position to lie, gaslight, and conceal his unethical behavior. The same audio that the federal government would love to hear how he manipulated agents into and committed several state and federal crimes. Without this recording, his misconduct would have been buried under the false legitimacy he tried to create through his title and office which is sick, twisted and diabolical. **Also during the meeting Paul Hamilton reiterated he did not have a problem with Thelma Lou LLC.** This is corroborated by the March 25, 2022, audio recording and the August 11, 2022, unemployment hearing recording, both confirming his approval. Hamilton lost the

unemployment hearing, and in retaliation, sought revenge by lying to the federal government, fabricating the narrative that I was prohibited and unauthorized.

Key Misconduct and Potential Crimes

- **False Statements to Federal Agents** – Contradictory and knowingly false statements under oath.
- **Abuse of Official Capacity** – Filing a false federal complaint against myself and another prosecutor.
- **Perjury** – Testifying falsely before the federal grand jury on November 1, 2022.
- **Misrepresentation of Position** – Falsely claiming to be First Assistant with authority he did not have in 2019.
- **Tell A Lawyer Retaliation** – Authorizing my work, then lying after losing an unemployment case.
- **Racially Discriminatory Conduct** – Targeting two Black prosecutors through false complaints.
- **Policy Misrepresentation** – Misleading the federal government about DA's office policies and their enforcement.
- **Obstruction of Justice** – Manipulating policy interpretations to mislead federal investigators.

Request for Action

I respectfully request that the Public Integrity Unit open a formal criminal investigation into Paul Hamilton's conduct for potential violations, including but not limited to:

- **Abuse of Official Capacity**
- **False Statements to Federal Agents**
- **Perjury before a Federal Grand Jury**
- **Official Oppression / Misuse of Authority**
- **Obstruction of Justice**
- **Retaliation**

His conduct has severely undermined the integrity of the Dallas County District Attorney's Office and corrupted the federal inquiry process. The administration sought to neutralize my credibility by constructing a false statement that was at the hands of Paul Hamilton the second person in command. The foundation of this claim was entirely fabricated. In 2019, the period they referenced, Paul Hamilton was not employed by the District Attorney's Office until February and did not become First Assistant until mid-2020. He had no legal, or supervisory authority to determine whether I had permission to operate a business or outside employment a business that was already in operation prior from 2019 under the Susan Hawk/Faith Johnson administration. The agent asked him specific questions, and he flat out lied. Paul never informed the federal agents that he did not become the first assistant until mid 2020, when 2019 was the subject of his false statements and misrepresentation where he proceeds to commit perjury under oath and under the oath as a Dallas County District Attorney and is oath as a Texas Attorney.

Nevertheless, Hamilton presented these false claims to federal agents, misrepresenting both the nature of my business and events that predated his tenure as the First Assistant. Using their official positions in August 2022, Hamilton under the guidance of John Cruzot and others accessed the channels to communicate directly with federal law enforcement. He **weaponized his role and institutional credibility** to push deliberate

lies, exploiting every procedural blind spot and cloaking himself in the appearance of authority. By relying on his standing as a public official his **position, power, and influence** he **manufactured false statements into legitimacy** and deliberately manipulated federal agents and federal prosecutors into advancing his scheme. This conduct was not a mistake or misunderstanding; it was a calculated abuse of office approved by John Creuzot that resulted in the **violation of multiple criminal statutes and core professional codes of conduct.**

This was not accidental. It was a calculated effort to **silence a whistleblower, derail public exposure of misconduct during the 2022 election season, and retaliate against someone who challenged the internal culture of their administration.** This retaliation was further validated by the **Texas Workforce Commission officer**, who ruled that Paul Hamilton did not follow office policy a finding that is unsurprising given that Hamilton also **lied under oath to federal agents and federal prosecutors.** He just didn't think he would get caught. In **April**, I sent over a **retraction notice** once I discovered that **Paul Hamilton and John Creuzot** were responsible for submitting false statements under oath to the federal government. I provided them an opportunity to retract those statements, and they **refused.**

The result was a weaponized misuse of public office: a coordinated campaign built on lies, fueled by retaliation, and executed through improper influence. The actions taken against me were not the product of independent federal investigation, but the direct outcome of Paul Hamilton manipulating federal processes to serve a personal vendetta in violation of his oath of office, oath as a lawyer and obligation to testify truthfully which he failed all three and a plethora of criminal offenses both state and federal.

Mr. Hamilton and District Attorney John Creuzot **directed the Civil Division to violate the Texas Office of Attorney General's Order dated May 23, 2025**, which required them to turn over all communications with the FBI, Federal Government, CIA, DEA, AUSA, and DOJ. Instead of complying, they deliberately withheld this information **to cover up their crimes plus more.**

This conduct is not only unlawful, but it also violates their **oath of office** as public officials and their **ethical duties as licensed attorneys.** Specifically, their actions constitute:

- **Ethical Violations (Rules of Professional Conduct)**
 - *Rule 3.03 (Candor Toward the Tribunal)* – failing to disclose material facts and actively concealing evidence.
 - *Rule 3.04 (Fairness in Adjudicatory Proceedings)* – obstructing access to evidence and defying a lawful order.
 - *Rule 8.04(a)(3) (Misconduct)* – engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation.
 - *Rule 8.04(a)(4) (Misconduct)* – conduct constituting obstruction of justice and knowingly violating a legal obligation.
 - *Violation of Oath as Attorneys* – failing to uphold the law and constitution while using their licenses as shields for corruption.

To date, I have been forced to file **three separate complaints** against every responsible party. Their **pattern of concealment and retaliation** reflects not just a breach of duty, but a systemic abuse of power intended to silence accountability and insulate themselves from criminal exposure.

Yaessy Pritchett

From: Paul E. Hamilton
Sent: Friday, October 22, 2021 4:02 PM
To: Thelma Anderson
Subject: RE: Check-in

I am here now. Been out of the office more than anticipated today.

Paul E. Hamilton

From: Thelma Anderson <Thelma.Anderson@dallascounty.org>
Sent: Friday, October 22, 2021 3:12 PM
To: Paul E. Hamilton <pehamilton@dallascounty.org>
Subject: RE: Check-in

Good Afternoon Paul,

I stopped by almost an hour ago. If you are free ill come back up.

From: Paul E. Hamilton <pehamilton@dallascounty.org>
Sent: Thursday, October 21, 2021 5:48 PM
To: Thelma Anderson <Thelma.Anderson@dallascounty.org>
Subject: RE: Check-in

Yes. I will be available tomorrow afternoon.

Paul E. Hamilton

From: Thelma Anderson <Thelma.Anderson@dallascounty.org>
Sent: Wednesday, October 20, 2021 9:18 AM
To: Paul E. Hamilton <pehamilton@dallascounty.org>
Subject: Check-in

Good Morning Paul,

Hope your week is going great. By chance do you have time Friday afternoon **so that I can update you regarding the request that was made?** I have meetings at Irving PD this afternoon and Garland Crime Lab tomorrow afternoon.

Thank you,

You got us in trouble lol



Sitting here reading Paul's email thinking about you 😂😂😂

Oh he sent a email 😱😱😱😱

Lol yeah what'd you think I was talking bout?

What did it say?

Basically everything you said they hemmed you up about

Making sure we don't practice law during business hours especially but not in general unless they have approved it

And how we can rep our family when it's approved

Basically it said, if you're earning money in any way besides your DA paycheck, run it by them or get fired lol

Protocols Re: Outside Employment for DA Staff



Paul E. Hamilton
To DA_STAFF

This email was sent 3/25/22

after Paul Hamilton fired me

so that he could cover his policy violation

because ahe failed to send this email when

he was promoted to being the first

assistant.

REMINDER RE: OUTSIDE EMPLOYMENT FOR ALL DA
EMPLOYEES

No employee of the Office is permitted to engage in outside employment on County time. For the most part, this is Monday through Friday from 8:00 a.m. – 4:30 p.m. for this office. Likewise and in conjunction, no employee is permitted to engage in outside employment of any sort or at any time that has not been approved per our office protocols. See DA Policy Manual, Sec. 2.19. This applies to those that might seek outside employment in the future as well as those of you that might be employed outside of the office now that did not follow the policy. It applies as well to outside businesses owned or operated by DA employees. If you earn money, expect to earn money or offer any service(s) to the public, it applies. We need to know about all outside employment opportunities and the proper approval must be documented in your employment file.

Lastly, as a reminder there should be absolutely **no engagement in the private practice of law, except** as specifically permitted by office policy. See DA Policy, Sec.

Lastly, as a reminder there should be absolutely **no engagement in the private practice of law, except** as specifically permitted by office policy. See DA Policy, Sec. 2.20. The policy provides that in limited circumstances a prosecutor might be permitted to represent a member of his/her family in an uncontested civil matter that does not require any court appearances. For these purposes, “engagement in the practice of law” is interpreted broadly. To be on the safe side and not run afoul of the policy, please let me know of any desire to represent a member of your family in an uncontested matter.

The primary concerns administratively are first and foremost to steer clear of potential conflicts of interests, to avoid undue influence or the appearance of undue influence or representations, the proper and responsible management of public funds and resources, and to uphold the integrity of the office. Any employee that does not comply with these policies will be subject to discipline, up to and including termination of employment.

Paul E. Hamilton

First Assistant/Chief Administrator

Dallas County Criminal District Attorney's Office

(P): [\(214\) 653-3600](tel:2146533600) (C) [REDACTED]

[133 N. Riverfront Blvd.](#), LB19

[Dallas, Texas 75207-4399](#)

Preferably you should refrain from disclosure in doubtful cases and refer any inquiries to the District Clerk or state authorities.

Section 2.19 Outside Employment

No employee of this Office will engage in outside employment on County time. Any after hours outside employment must be discussed with the employee's immediate supervisor to be ensure that no conflict of interest exists. Outside employment must be approved by the First Assistant District Attorney.

Section 2.20 Private Practice

Private practice of law is prohibited, except as provided herein. The purposes of this rule are to ensure the State and County have the Assistants' full time attention and to ensure there are no conflicts of interest. A violation of this rule will be grounds for disciplinary action up to and including termination of employment.

An Assistant may, however, represent a member of his or her family in an uncontested civil matter provided no court appearance is required. Naturally, no indicia of private law practice whatsoever is permitted and none of the facilities or employees of the District Attorney's Office should be used in such representation.

Effective September 1, 1993, the legislature provided that prosecutors may provide pro bono representation to the indigent if "providing the services does not interfere with the prosecutor's official duties or regularly compensated hours of employment." See Section 41.14, Government Code. Representation of any person under these legislatively approved circumstances must have the prior approval of the District Attorney or First Assistant in order to ensure that no conflict of interest exists.

Section 2.21 Conflict of Interest

No employee of the District Attorney's Office shall take any action on a case in which he or she has a personal interest or connection. If any employee has a personal interest or connection to any case in the Office, he or she must bring this information to the attention of the First Assistant District Attorney.

No employee of the District Attorney's Office may solicit or accept any benefit from any person against whom criminal charges are filed or contemplated from their attorneys or representatives, or from any individual having an interest in a matter within the jurisdiction of the District Attorney.

The Texas Rules of Professional Conduct provide that a lawyer serving a government agency should not "participate in a matter involving a private client when the lawyer [has previously] represented that client in the same matter while in private practice or non-governmental employment" Tex. Disciplinary Rules of Professional Conduct, 1.10(e)(i). Accordingly, any such lawyer who is hired by this office as an Assistant District Attorney shall be screened from

Terminations Meeting March 25, 2022, transcript

Page 8 Paul Hamilton 20:08

I know I'm saying I'm not here to give guidance, specific guidance on that sort of thing. **I took the special effort in this instance after you talked to the judge that day and he left the room. It was the same discussion we're having now. It makes no sense honestly. But I stuck around to explain, here's how we can fix or rectify or make this work if it is what you are representing it to be. That did not happen.**

Paul claimed he wasn't responsible for providing guidance, yet the policy states the First Assistant (himself) is required to do so. **Despite saying**, "I'm not here to give guidance," he admitted to making a "special effort" after your discussion with the John Cruzot, contradicting himself. He stayed to offer solutions to fix but later dismissed responsibility, proving his stance was inconsistent with policy.

- **The final sentence expressly preserves my prior authorization and imposes no prohibition in fact it provides guidance that was corrected that led to a subsequent meeting on October 22, 2021.** Mr. Hamilton's later representations to federal agents and his grand jury testimony falsely portraying I was prohibited and lacked authorization. That portrayal **flatly contradicts his federal complaint against me and Jeneba Barrie**, his emails to federal agent, his federal grand jury testimony, reflects a **deliberate mischaracterization**, and underscores an **egregious, knowing inconsistency** amounting to deceit. That assertion **directly contradicts the text**, evidencing a **knowing misstatement and intent to mislead**.

Page 9 Paul Hamilton 21:40

Okay. But okay, I'm aware of some other stuff and I purposely don't mention that stuff because that's not what this is about. **It's not about clothing, it's not about sandals, it's not about any of that. I'm aware of all of that.** But this is not about any of that. And it is not about accident that it's not about that. This is strictly about the legal practice or the representation or the implication to the public that it's a legal practice and I can't get around that. I can't make an excuse to myself on your behalf to get around that.

- **Second sentence:** Mr. Hamilton admitted that he did not have a problem with my apparel and sandal company, **(Thelma Lou operated and owned)** but the Paul Hamilto falsely stated that I was prohibited in writing and under oath during a federal grand jury proceeding. He clearly stated he didn't have an issue but submitted false statements to the federal government.
- **Fourth sentence:** This matter is strictly about the legal practice, the representation, and the implication to the public that it was an active legal practice. The reality is that the company in question was non-operational and not active at the time. Despite this, Paul Hamilton knowingly presented the company as active in 2019 in order to mislead the federal government. This deliberate misrepresentation created a false narrative and falsely implied misconduct on my part, when in fact there was no active legal practice.

Page 18 Paul Hamilton (38:29):

- **You're sacrificial.** You're the person who that you have done is a clear violation, so you sacrificial about it. There may not be anybody else, but I'm saying I'm going to make that inquiry. The same inquiry I made with regard to yours or stumbled across, **I'm going to make that inquiry as to every single person and they are going to be treated the same way fairly**
- You were the **sacrificial lamb**—singled out to take the fall while no clear precedent existed. Paul Hamilton misled, committed perjury the federal agent into believing that I was terminated because I was prohibited from and not authorized to operate an outside business. This was false. In fact, Hamilton himself had personally given me permission to continue operating Tell A Lawyer, instructing me only to place disclaimers on my website.
- This was clearly stated during our October 15, 2021, meeting, where Hamilton confirmed he had no issues with Thelma Lou or the Tell A Lawyer project so long as I place disclaimers on the website which was confirmed during our Meeting on October 22, 2021. I also emailed Paul on October 20th asking to meet with him regarding the updates that were made to the website. This fact is further corroborated by:
 - The audio recording from March 25, 2022, and
 - The audio recording from the August 11, 2022, Unemployment Hearing, both of which confirm Hamilton's prior approval. The unemployment hearing ultimately resulted in Hamilton losing, which directly motivated him to seek revenge by lying to the federal government in order to harm my credibility, career, and freedom.
 - The key card to access the 11th floor for both meetings.
 - Paul misled the federal agent to believe that I was terminated I was prohibited and not authorized when he gave me permission to keep operating Tell A Lawyer by stating I only had to put disclaimers on my website during the October 15, 2021 meeting and he also stated during that meeting and in audio on March 25, 2022 and August 11, 2022, along with he didn't have any issues with Thelma Lou that is confirmed in the audio recording March 25, 2022 and the audio recording from the unemployment hearing on August 11, 2022 which resulted in Paul Hamilton losing the unemployment hearing that led him to seek revenge through lying to the federal government. pursued my termination aggressively, then used it as justification to expand enforcement. This is not only a direct violation of his oath in office, but his oath as a lawyer and several criminal violations.
- Only after firing me **did paul hamilton start applying the policy to others, proving the rules or enforcement** changed after my removal. This is documented in the email he sent on March 25, 2022 immediately after he terminated me. I was the sacrificial lamb and once Paul and John saw the outcome, they adjusted their approach at my expense resulting in submitting a false statement to the federal government.

Unemployment hearing transcript

Page 13 Paul Hamilton: (01:25:17)

- She owned a shoe company

Page 15 Paul Hamilton (29:23)

- We had some other concerns with regard to Ms. Anderson. It wasn't a matter of not performing her responsibilities here, et cetera, et cetera, but there were lots of other things that were kind of going on that made us go back and look at this some other things like we discovered that she had applied for some PP loans and got those while she was working here full-time as an employee here and we had no reason to believe that she ever have employed anybody when she applied and seen PPE loans from the federal government. Those things were kind of on our mind and of concern, so we're the prosecutor. I'm thinking if you go and do what might be, **I'm not going to accuse somebody of something but might be a misrepresentation to the federal government to receive some sort of benefit and get that forgiven,** then I have concerns about the misrepresentation that you're making to me here about again what we have talked to you about. That's clearly before, since out there on the worldwide web.

Page 28 Paul Hamilton (55:19):

Policy changing after I left

If a person wants to operate a business in this office, they can operate businesses other than law practices. We have a request form that we require people to tell us what those businesses are, the nature of the business, et cetera, so that we can do the appropriate conflict checks. If there are no conflicts, then we will approve those businesses and we move on. **And that policy was clarified in this office after we dealt with you.**

PAGE 29 Thelma Anderson (55:42):

Exactly. I'm glad you brought that up, **that you inputted an additional checks and balance for the office to require that all individuals in the office provide you with any outside businesses or there if they're working for someone so that you can put it in the file, correct?**

Paul Hamilton (56:06):

That's correct. But outside businesses in general.

Page 28 Thelma Anderson (56:13):

So, I understand that you want to make this about the practice of law, but I'm asking you specifically Absolutely. **That was pertaining to your checks and balances that could have been done when you first became the first assistant mid-2020, correct? That it could have been something that you implemented mid-2020, correct?**

- Paul was not my direct supervisor 2016-2019, nor was he the First Assistant in 2019, and therefore had no authority to prohibit or authorize my outside business or employment

under Policy 2.19. My business was already in operation prior to his employment with the District Attorney's Office and prior to him becoming First Assistant in 2020. Yet, Paul Hamilton lied to the federal agent, under oath, and to the AUSA, falsely claiming authority he did not possess to mislead them. He knowingly misrepresented his role despite lacking the requirements under the policy to make such determinations.

Paul Hamilton (56:39):

It was brought to my attention that this is a concern that we need to know all of the outside systems interests of people after we dealt with you and a few others, not just you.

Page 30 Thelma Anderson (59:52):

Okay. Now, would it surprise you if I have a recording of our interaction on March the 25th that contradicts everything that you've stated here today?

Paul Hamilton (01:00:09):

It would've surprise me if you recorded the meeting that we had on the 25th. That would've surprised me one day. Okay. **I can tell you that nowhere in that recording will show that I took undertook an obligation to reassert to you that you can't practice law while working here.** Here is another statement straight out of his mouth during the unemployment hearing where he never mentions Thelma Lou like he committed perjury to the federal grand jury.

Page 38 Thelma Anderson (01:15:38):

I'm going through it now. Yes. This is the receipt of when Faith Johnson was the District Attorney, not John Cruezet. So, this is predated. Okay,

- Paul submitted the oath I signed in 2017 under Faith Johnson further showing they were not employed or elected officials until 2020

Page 42-43

- And I also want to mention the actual policy that's in the acknowledgement that is from Faith Johnson when she was the actual da, not John Cruezet, when the previous administration whom I was responsible for reporting to was well aware of every business that I had entered into every one of them, and it's based off of the timeline.
- When you look at the timeline based off of the interactions I had, every business venture that I had, they were aware of from **Thelma Lou** to tell a lawyer to **my loungewear, to my footwear, to my shirt line, to my scholarship, brunches, to me representing someone that was a business partner on a small claim, silver matter to me working with New York and company.** Mr. Hamilton didn't do his due diligence as a first assistant, which he admitted that he did not, which he's responsible for making sure that he's aware of what everyone is doing in the office. I did my part as an employee on **October 22, 2021**, I returned to Mr. Hamilton to ensure he reviewed the changes. He later admitted on **March 25, 2022**, and **August 11, 2022**, that he had not. He also admitted that over the next **six months**, he and **DA**

John Creuzot monitored my business but **never objected to, prohibited, or revoked** my authorization to operate **Thelma Lou** or **Tell A Lawyer**. I have documented proof of this oversight and monitoring, including **screenshots showing DA Creuzot viewing my LinkedIn profile on December 15, 2021**. Mr. Hamilton stated has over 500 employees he can't just focus on myself which was why he didn't follow up.

Page 43 Paul Hamilton: (01:25:17): closing statement

- I'll take very seriously. I respect and appreciate the opportunity to make a final statement and I will make it brief. The decisions in this office were made solely based upon the policy that were produced to all of our employees and regardless of the chain of the elected officials, **the policy was the same with regard to practice of law. It has always been prohibited and it remains** permitted.
- Paul confirmed that his issue was with **Tell A Lawyer**, not **Thelma Lou**. Tell A Lawyer was not active or operational. He also admitted that he never checked with the Secretary of State to verify the company's status had he done so, he would have seen that in **February 2022 the business was marked abandoned**. **This confirms that he misrepresented to the federal government that I was operating a company that was not operational in the state at the time of my wrongful termination.** Paul had every opportunity to raise any concern with Thelma Lou, but he did not. In fact, he was adamant that he had no issue with the company, and neither the **October 2021 memo** nor the **March 25, 2022, termination memo** ever referenced Thelma Lou. He also confirmed that he did not provide me with a copy of the memo from October 15th meeting which he was required to do indicating yet another ingredient to the laundry list of violations he committed

Paul E. Hamilton

From: Paul E. Hamilton
Sent: Wednesday, January 25, 2023 11:17 AM
To: Katherine Schwethelm
Subject: RE: [External Sender]Follow-up - Request to serve Grand Jury Subpoena for records re Thelma Anderson

No problem at all. We will get you whatever you need. The Policy Manual was last officially updated when the current District Attorney took office in January 2019. I don't not that it was actually substantively updated from what it had been as much as they had all employees sign off on the manual with the beginning of a new administration. I wasn't here at the time. When I came to the office in February 2019, just a few weeks into the new administration, this was in place. The only change (or clarification) that we have made regarding outside employment came after these two prosecutors left their employment with us. It would not apply to these individuals. We re-emphasized to all employees the prohibition against outside employment not properly documented and approved. It resulted in large part from what we discovered in looking into these two situations.

Paul E. Hamilton

Email: Pehamilton@dallascounty.org

From: Katherine Schwethelm <kcschwethelm@fbi.gov>
Sent: Wednesday, January 25, 2023 8:12 AM
To: Paul E. Hamilton <pehamilton@dallascounty.org>
Subject: Re: [External Sender]Follow-up - Request to serve Grand Jury Subpoena for records re Thelma Anderson

Mr. Hamilton,

Thank you for the quick response.

Do you know the effective date of the Policy Manual? Also, was it updated at any time after 2019? If so, will you kindly send over the updated copy/copies as well?

V/R,

Katherine Schwethelm

From: Paul E. Hamilton <pehamilton@dallascounty.org>
Sent: Tuesday, January 24, 2023 4:31 PM
To: Schwethelm, Katherine C. (DL) (FBI) <kcschwethelm@fbi.gov>
Subject: [EXTERNAL EMAIL] - RE: [External Sender]Follow-up - Request to serve Grand Jury Subpoena for records re Thelma Anderson

Good Morning Ms. Schwethelm:

Addressing your questions, Ms. Anderson did not submit any requests nor did she receive any authorization to take on outside employment during her time with us.

Yes, she was prohibited from having outside employment while with the office without express authorization. See Policy Manual Sec. 2.19 and Sec. 2.20, the latter specifically prohibiting the outside practice of law. This employment policy was loosely enforced until many of the issues and complication raised by her activities came to light. I have also attached a copy of our Professional Responsibility Review Policy, dated 2-13-2020. Please let me know if I can provide any further information.

Paul E. Hamilton

Email: pehamilton@dallascounty.org

From: Katherine Schwethelm <kcschwethelm@fbi.gov>
Sent: Monday, January 23, 2023 1:29 PM
To: Paul E. Hamilton <pehamilton@dallascounty.org>
Subject: [External Sender]Follow-up - Request to serve Grand Jury Subpoena for records re Thelma Anderson

Good afternoon Mr. Hamilton,

Thank you for provide documentation regarding Thelma Anderson. I have a few follow-up questions:

- Did Anderson ever request authorization to have outside employment/business while working for the DA's office?
- Did she obtain approval to have outside employment/business while working for the DA's office?
- Was she prohibited from having outside employment/business? Is this documented?

Also, documents in the production stated Ms. Anderson was terminated for having an outside law practice. It appears she also operated an online retail clothing store during her employment. Would this have been permissible with or without approval?

Lastly, would you be able to provide a copy of the District Attorney's Office Professional Responsibility Review Policy and Office Policy Manual for the years of Ms. Anderson's Employment (2016-2022).

Thank you,

Katherine Schwethelm

From: Paul E. Hamilton <pehamilton@dallascounty.org>
Sent: Monday, November 14, 2022 10:56 AM
To: Schwethelm, Katherine C. (DL) (FBI) <kcschwethelm@fbi.gov>
Subject: [EXTERNAL EMAIL] - RE: [External Sender]Request to serve Grand Jury Subpoena for records re Thelma Anderson

See attached. Please let me know if it does not work.

From: Katherine Schwethelm <kcschwethelm@fbi.gov>
Sent: Friday, October 28, 2022 11:57 AM
To: Paul E. Hamilton <pehamilton@dallascounty.org>
Subject: [External Sender]Request to serve Grand Jury Subpoena for records re Thelma Anderson

Mr. Hamilton,

Please accept service of the attached Grand Jury subpoena. Please advise if this is not a valid method of service.

If you have any questions, please do not hesitate to contact me at the number below.

Regards,

Katherine Schwethelm

Special Agent

Dallas Division

1 Justice Way

Dallas, Texas 75220

Cell: (817) 320-4376

kcschwethelm@fbi.gov

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UNITED STATES DISTRICT COURT
Northern District of Texas

TO: Dallas County District Attorney's Office

Attn: Custodian of Records

c/o First Assistant District Attorney Paul Hamilton
Via email at pehamilton@dallascounty.org
Telephone 214-653-3767

**SUBPOENA TO TESTIFY
BEFORE GRAND JURY**

SUBPOENA FOR:

PERSON

DOCUMENT(S) OR OBJECT(S)

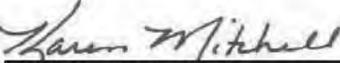
YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE 1100 Commerce St., Third Floor Dallas, TX 75242-1699	COURTROOM Grand Jury Room
	DATE AND TIME 11/1/2022 9:00 am

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):*
PLEASE SEE ATTACHMENT

Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK  (By) Deputy Clerk		DATE 10/21/2022
--	---	--------------------

This subpoena is issued on application of the United States of America	NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY Michelle Winters Assistant United States Attorney 1100 Commerce St., Third Floor Dallas, TX 75242-1699 (214) 659-8600
--	--

* If not applicable, enter "none".

RETURN OF SERVICE ⁽¹⁾		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL 0.00
DECLARATION OF SERVER ⁽²⁾		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p>		
Executed on	_____	_____
	DATE	SIGNATURE OF SERVER

		ADDRESS OF SERVER

<p>ADDITIONAL INFORMATION</p>		

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal Rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".



ATTACHMENT TO FEDERAL GRAND JURY SUBPOENA

Dallas County District Attorney's Office
Custodian of Records
c/o First Assistant District Attorney Paul Hamilton
Via email at pehamilton@dallascounty.org
Telephone 214-653-3767

Documents to be produced: Please provide the entire personnel (employment) file for the below identified individual.

Name: Thelma Marshall Anderson

DOB: [REDACTED]

SSAN: [REDACTED]

Said records include, but are not limited to the following:

1. Job application,
2. Resume,
3. Accommodations, letters of recommendation, and awards;
4. Performance evaluations;
5. Any citations or disciplinary actions;
6. Work plans;
7. Requests for outside employment;
8. Time and attendance records;
9. Letter of resignation and/or separation paperwork; and
10. Any other records maintained in the individual's personnel/employment file.

Additional Instructions

The Custodian of Records is requested to provide this information with an executed Custodian of Record Affidavit. For delivery of documents responsive to this subpoena, they may either be delivered to the Grand Jury on the date and time identified in the Grand Jury subpoena or provided to Special Agent Katherine Schwethelm.

Records produced in compliance with this subpoena may be emailed to kcschwethelm@fbi.gov or mailed to the following address:

Federal Bureau of Investigation
c/o SA Katherine Schwethelm
One Justice Way
Dallas, Texas 75220

Notice: Records are requested in digital format

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS RECORDS
PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, _____, certify that I am employed by _____
and that my official title is _____. I am a custodian of records for____
_____. I state that each of the records attached hereto is the original
record, or a true duplicate of the original record, in the custody of _____
and that I am the custodian of the attached records, consisting of _____ pages.

I further state that:

1. All records attached to this certificate were made at or near the time of the
occurrence of the matters set forth by, or from information transmitted by, a person with
knowledge of those matters;

2. Such records were kept in the course of a regularly conducted business
activity of _____; and

3. Such records were made by _____ as a regular practice.

I further state that this certificate is intended to satisfy the requirements of Rule
902(11) of the FEDERAL RULES OF EVIDENCE.

I hereby certify under penalty of perjury that the aforesaid is true and correct.

Executed on the ____ day of _____, 2022.

Print Name: _____

Title: _____

Paul Hamilton's statement testimony was a material falsehood he knowingly presented under oath to the federal government. The Special Agent and the AUSA posed clear, unambiguous questions, and he understood that his response was misleading and false. By doing so, he breached his oath of office, violated his professional duties as an attorney, and broke the oath he swore before the grand jury. The conduct satisfies the elements of perjury (18 U.S.C. § 1623) and implicates false statements (18 U.S.C. § 1001) and obstruction statutes willful, intentional deceit delivered to influence a federal proceeding. He simply did not expect to be caught.

4. Between on or about July 5, 2016, and on or about March 25, 2022, defendant **Thelma Marshall Anderson** was employed full-time as an Assistant District Attorney for the Dallas County District Attorney's Office. Pursuant to her role as an Assistant District Attorney, **Anderson** was prohibited from having outside employment without express authorization from the Dallas County District Attorney's Office. **Anderson** did not request nor receive any such authorization while employed as an Assistant District Attorney.

2.19 OUTSIDE EMPLOYMENT: NO EMPLOYEE OF THIS OFFICE WILL ENGAGE IN OUTSIDE EMPLOYMENT ON COUNTY TIME. ANY AFTER HOURS OUTSIDE EMPLOYMENT MUST BE DISCUSSED WITH THE EMPLOYEE’S IMMEDIATE SUPERVISORS TO ENSURE THAT NO CONFLICT OF INTEREST EXISTS. OUTSIDE EMPLOYMENT MUST BE APPROVED BY THE FIRST ASSISTANT DISTRICT ATTORNEY.

Flaws in the Policy's Wording

- “Lack of Clear Definition of **"Outside Employment"**
- The policy specifically states that employees must report “outside employment,” but it does not define whether this includes self-employment or business ownership.
- The common interpretation of “outside employment” implies working for another employer, not owning a business.

2. Failure to Address Business Ownership

- The policy **does not state that employees must report owning or operating their own business.**
- By omitting this distinction, the policy creates ambiguity—employees could **reasonably assume they only need to report working for another employer,** not their own business activities.

3. Misinterpretation of Conflict of Interest

- The policy requires discussion with supervisors to ensure no conflict of interest, but **it does not clarify** whether business ownership inherently creates a conflict.
- Since **business ownership is not explicitly addressed,** an employee could assume their business is irrelevant unless it directly interferes with their duties.

How This Applies to My Situation

1. Your Business Was Disclosed Before Employment

- I identified and disclosed your invention and business before being hired.
- My supervisors were aware of your business activities, meaning there was an implicit understanding and acknowledgment of my outside endeavors where meetings were held to discuss.

2. Supervisors’ Awareness Implies Permission

- Since **my supervisors knew about your business** and still proceeded with my employment, this **confirms approval.**
- If there were concerns about a conflict of interest, **they should have addressed them at that time.**

3. No Requirement to Report Something Already Known

- The policy only mandates reporting outside employment, not reiterating pre-existing disclosures.
- My business was already known and acknowledged prior to the administration taking office in 2020, **requiring additional reporting would be redundant.**

Conclusion

The policy is flawed because it did not clearly define business ownership as “outside employment,” leading to a reasonable interpretation that it does not need to be reported. Furthermore, since my supervisors were already aware of your business (invention) before hiring, their awareness serves as implied permission. Therefore, any claim that I failed to disclose outside employment is unfounded, as my business was never categorized under the policy’s definition of “outside employment.”

Timeline Regarding Business Ventures

2014

- The foldable footwear invention was created during my last year of law school

2015

- Employed part-time by New York and Company and full time with the American Arbitration Association.

2016

- **April:** I came up with the name (Feet Treats) for my foldable footwear invention.
- **May 2016:** Interviewed for a position at the DA's office by Kevin Brooks, Dewy Mitchell, and Kendall. During the interview:
 - Disclosed employment at American Arbitration Association, New York and Company, Feet Treats foldable footwear invention.
- **July 5** Started employment at the DA's office under the Susan Hawk Administration I signed my oath **(They did not give me a copy of the policy we only sign the oath)**
- Supervisor: Dewy Mitchell (Misdemeanor Division Chief).
- Division Chief: Shawnkeedra Martin (over my assigned court).
- Both Dewy Mitchell and Shawnkeedra Martin were informed of outside employment and business ventures as required by policy.

2017

- **April:** I officially formed Feet Treats LLC
- **July:** Trademark was filed for Feet Treats
- **November:** Amended the LLC and changed the name to Thelma Lou LLC and Trademark Filed
- **December:** I received persimmon from Shawnkeedra Martin (Supervisor) to litigate a small claims civil suit in Grand Prairie JP court.

2018

- **September 22, 2018:** Attended the DWBA annual sparkler in Rockwall where The district attorney Faith Johnson and former supervisor was present where I promoted my position as a prosecutor and my business Thelma Lou highlighting my sandal invention, along with mentioning the future launch of the apparel line, I also handed out a pamphlet and collected emails for my email list.
- October 2018: Patent application filed for the Thelma Lou Foldable Footwear invention.
- Under the District Attorney Faith Johnson Administration, Thelma Lou apparel line was officially launched in November 10, 2018, with online and in-person sales. **(They did not give me a copy of the policy we only sign the oath)**
- Colleagues purchased some of my apparel

2019

In September, I attended the DWBA Annual Sparkler event, where I promoted my role as a prosecutor and my business, Thelma Lou. I highlighted my patent-pending foldable footwear sandal along with my apparel line. The current District Attorney, Judge Faith Johnson, was also present as she was campaigning for re-election, along with Shawnkeedra Martin.

- **October:** Hosted the first Bae Brunch to promote Thelma Lou apparel; colleagues purchased tickets and promoted the line.
- **December:** Spoke about the Thelma Lou brand during the annual Prosecutor Ornament Party. Colleagues purchased apparel through the website. Division Chiefs, Jen Faulk, Stephanie Fargo, Laquita Long, District Attorney Faith Johnson.

2020

- **January** John Creuzot Administration start as he takes office as the newly elected District Attorney where he name Kevin Brooks as his First Assistant. We had to sign the oath for his administration. **(They did not give me a copy of the policy we only sign the oath)** there was no policy update or request to identify employees' outside business ventures.
- **January 22, 2020:** Called to a meeting with Shawnkeedra Martin and Jerry Varney. Informed that:

Shawkeedra was my misdemeanor administrative supervisor **July 2016-May 2018**. Jerry Varney was my current Felony Family Violence Division Administrative Supervisor **October 2019-May 2020**

The meeting was with Amber Gregg, a felony prosecutor, and Shawnkeedra Martin, both sorority sisters of Alpha Kappa Alpha Sorority, Incorporated, and friends. They informed Shawnkeedra about my onesie line.

Shawnkeedra called me upstairs and told me that I could not be the model for my onesie apparel line. Instead, I would need to hire models to sell my line, and I had to remove my promotional business post from my business page, Thelma Lou, immediately. She then directed me to speak with Jerry Varney, who was my current Felony Family Division Chief who reiterated that I needed to hire models. He clarified that the issue was not with me owning the company but with the fact that I was modeling the onesies myself.

Jerry also mentioned their concern about ensuring I was not posting on my social media business page during work hours. I informed him that all my posts were scheduled in advance using a scheduling app. He then noted that the office's policy on entrepreneurship needed to be updated to account for employees with outside businesses. He explained that the current policy was outdated because they were not accustomed to prosecutors being ambitious beyond their legal roles.

I told Jerry that I would remove the promotional post, take down any images of myself wearing the onesies, and hire models when I resumed selling. I was never reprimanded but was given guidance on how to proceed. Their primary concern was avoiding the perception that I was the face of a brand selling revealing clothing, given my body shape. I was informed that I could sell onesies as long as they were not revealing and that I used hired models. However, selling Thelma Lou Onesies was not permissible while working for the DA's office.

- both Shawnkeedra Martin and Jerry Varney Directed me to hire models instead of directly showcasing the apparel that appears revealing of my shape. Complied with the directive.

August:

- August 2020 received a patent for the Thelma Lou sandal, announced via social media.
- Launched the Bae Collection by Thelma Lou using hired models. The collection sold out in October.

Technology Development:

- Correspondence with the app developer.
- November 26, 2020: Email discussions initiated regarding the app development.

2021

- **January 2:** Filed for a trademark for Tell A Lawyer in Classes 42 and 45.
- Attached examples demonstrating USPTO standards for commerce usage
- **August 26:** Confirmed the prototype for the jury selection software.

September: the office sent out an adjunct criminal justice professor position with UNT. I sent over my resume that had my business email attach which I updated to make sure the correct email address was attached. The email address went from Thelma.anderson10@gmail.com to info@tellalawyergroup.com

October 15: I was called up to DA John Cruzot's office by Laquita Long, where Paul Hamilton was also present. They accused me of operating a law practice, which I denied, and I provided proof to support my denial.

They stated that because I had included my business email on my resume, they conducted their own research. I explained that I had nothing to hide, which is why my email address was listed—it was accurate and intentional.

Paul Hamilton instructed me to place disclaimers on the website. He also stated that he had no issue with my company, Thelma Lou, because it was not engaged in the practice of law nor did it appear to be.

October 16-20:

- Website temporarily disabled to make corrections based on feedback.
- Communicated updates with the developer regarding the site.

October 21-22: Correspondence with Paul Hamilton:

- Emailed Paul Hamilton regarding website corrections so that we could meet so he could review
- Met to review changes, awaiting feedback on their acceptability.
- Mr. Hamilton never reviewed the website or followed up with me after he was supposed to review which is required by the District Attorney Office Policy
- **December 8:** Notified that John Cruzot viewed my LinkedIn profile. No feedback provided regarding website updates.

2022

February- I allowed the LLC to become inactive rendering non-operational even though I didn't have to or was I order to do so by the DA's Office

March 23: Screenshots of Thelma Lou's Instagram page were added to my employee file by Paul Hamilton.

- **March 25:**
- Terminated while under FMLA protocol.
- No prior documentation provided regarding concerns.
- **Audio recording** indicated Paul Hamilton had no issues with Thelma Lou but objected to Tell A Lawyer. He admitted to failing to follow up with me regarding the changes that he requested be made.
- Following termination, on the same day Paul Hamilton issued a new policy requiring employees to disclose outside business ventures, citing me as the reason during both the exit meeting and unemployment hearing.

August

Paul Hamilton testified during the Texas Workforce Commission hearing for my unemployment case that he did not understand how I could have employees while working at the District Attorney's Office. This statement confirms that he was aware of my company, Thelma Lou, and had never expressed any issues or concerns regarding its operation.

Key Points

1. Disclosure of Outside Employment:

- All supervisors, including Dewy Mitchell and Shawnkeedra Martin, were informed of outside employment and business ventures during the interview process and throughout employment.

2. Policy Inheritance and Updates:

- The **Faith Johnson Administration** was aware of all business ventures.
- The **John Cruzot Administration** failed to update or request information from employees regarding outside ventures until March 2022, after termination.

3. Directive for Business Modification:

- Directed to hire models but not cease Thelma Lou operations (e.g., hiring models for promotions).
- Directed to put disclaimers on my website for Tell A Lawyer (not cease operations)
- Feedback on website corrections was promised but not delivered.

5. Post-Termination Actions:

- Policy updates regarding outside ventures were implemented after termination, directly referencing the situation.

The DA's office falsely represented to the federal government that I did not have permission for outside employment, despite the office's own policy requiring disclosure to supervisors, all of whom were aware of my outside employment and business ventures. Furthermore, this issue only arose after I applied for a University of North Texas (UNT) professor position, which had been advertised and approved by the DA's office.

It is a federal offense to lie to the federal government which could lead to federal charges (identify the federal statute and add how they violated and should be charged) this adds to the level of vengeance they would go to lie to the federal government.

Additionally, in 2024, the indictment was reposted on multiple major platforms, including news outlets, social media platforms, and digital media. Among the outlets that covered the story were CBS, Yahoo, MSNBC, Fox, and NBC.

The District Attorney's Office knowingly provided false information to the federal government in an effort to defame, slander, and cause me mental anguish, financial hardship, and emotional distress. Their actions were intended to end my career by falsely stating that I was not allowed to have outside employment because I did not have permission—despite their full knowledge that this claim was untrue.

As a direct result of the false and defamatory statements made by the Dallas County District Attorney's Office, I have suffered the following damages:

1. Loss of Employment and Professional Appointments

- I lost my appointment with the Fort Worth Municipal Court, resulting in significant financial loss and damage to my professional reputation.
- I was wrongfully terminated and suffered the immediate loss of my primary source of income.
- I lost the opportunity to get hired with the City of Dallas Municipal Court a position I interviewed for on April 30, 2024 and was asked to move into the city limits.

2. Destruction of My Businesses

- I was forced to shut down my business, Thelma Lou, due to the indictment, which directly led to my unemployment and financial hardship.
- I was required to shut down Tell A Lawyer because it was mischaracterized as the unauthorized practice of law, further compounding my financial and professional losses.

3. Severe Emotional and Psychological Distress

- I suffered from extreme anxiety, stress, and fear as a result of the false allegations.
- The ongoing distress led to severe depression, further affecting my mental and physical health.
- The emotional trauma directly resulted in a miscarriage, causing irreparable harm and devastation.
- The stress resulted in my providers having to prescribe anxiety medicine.

4. Damage to My Legal Career and Professional Standing

- I was suspended from the practice of law, which stripped me of my livelihood, professional credibility, and ability to earn a living.
- The false allegations have created long-term reputational harm, making it significantly more difficult to secure future employment and professional opportunities.

5. Loss of Pregnancy

- The stress caused me to have a miscarriage.

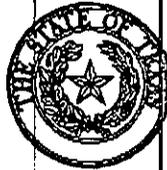
The following included the original company I created in 2016, the logo, the LLC formed and then Amended, The Trademarks application and the trademark registration for Thelma Lou. John Cruezot and Paul Hamilton was not employed nor did they have authority to tell me I was prohibited from operating Thelma Lou

Feet
Presents

The logo features the words "Feet" and "Presents" in a white, cursive script font. The text is set against a vibrant rainbow gradient background that transitions from purple at the top to red, orange, yellow, green, and blue at the bottom. To the right of the word "Feet", there is a stylized illustration of a pair of feet, also rendered with the same rainbow gradient and a dark purple outline. The overall design is playful and eye-catching.

Form 205
(Revised 05/11)

Submit in duplicate to:
Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
512 463-5555
FAX: 512 463-5709
Filing Fee: \$300



**Certificate of Formation
Limited Liability Company**

This space reserved for office use.

FILED
In the Office of the
Secretary of State of Texas

MAR 07 2017

Corporations Section

Article 1 – Entity Name and Type

The filing entity being formed is a limited liability company. The name of the entity is:

FEET TREATS Limited Liability Company

The name must contain the words "limited liability company," "limited company," or an abbreviation of one of these phrases.

Article 2 – Registered Agent and Registered Office

(See instructions. Select and complete either A or B and complete C.)

A. The initial registered agent is an organization (cannot be entity named above) by the name of:

OR

B. The initial registered agent is an individual resident of the state whose name is set forth below:

THELMA

M

ANDERSON

First Name

M.I.

Last Name

Suffix

C. The business address of the registered agent and the registered office address is:

2625 N. STATE HWY 360 APT 914

GRAND PRAIRIE

TX

75050

Street Address

City

State

Zip Code

Article 3 – Governing Authority

(Select and complete either A or B and provide the name and address of each governing person.)

A. The limited liability company will have managers. The name and address of each initial manager are set forth below.

B. The limited liability company will not have managers. The company will be governed by its members, and the name and address of each initial member are set forth below.

GOVERNING PERSON 1

NAME (Enter the name of either an individual or an organization, but not both)

IF INDIVIDUAL

Thelma

M

Anderson

First Name

M.I.

Last Name

Suffix

OR

IF ORGANIZATION

Organization Name

ADDRESS

2625 N. STATE HWY 360 APT 914

GRAND PRAIRIE

TX

USA

75050

Street or Mailing Address

City

State

Country

Zip Code

GOVERNING PERSON 2			
NAME (Enter the name of either an individual or an organization, but not both.)			
IF INDIVIDUAL			
First Name	M.I.	Last Name	Suffix
OR			
IF ORGANIZATION			
Organization Name			
ADDRESS			
Street or Mailing Address		City	State Country Zip Code

GOVERNING PERSON 3			
NAME (Enter the name of either an individual or an organization, but not both.)			
IF INDIVIDUAL			
First Name	M.I.	Last Name	Suffix
OR			
IF ORGANIZATION			
Organization Name			
ADDRESS			
Street or Mailing Address		City	State Country Zip Code

Article 4 – Purpose

The purpose for which the company is formed is for the transaction of any and all lawful purposes for which a limited liability company may be organized under the Texas Business Organizations Code.

Supplemental Provisions/Information

Text Area: [The attached addendum, if any, is incorporated herein by reference.]

- Feet Treats is a company designed to provide women and men with affordable retail sandals for anytime of the day.
- Feet Treats will also provide a variety of personal foot care and retail services for women and men.

Organizer

The name and address of the organizer:

Thelma M. Anderson

Name

2625 N. State Hwy 360 apt 914

Street or Mailing Address

Grand Prairie

City

TX 75050

State Zip Code

Effectiveness of Filing (Select either A, B, or C.)

- A. This document becomes effective when the document is filed by the secretary of state.
- B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: _____
- C. This document takes effect upon the occurrence of the future event or fact, other than the passage of time. The 90th day after the date of signing is: _____

The following event or fact will cause the document to take effect in the manner described below:

--

Execution

The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized to execute the filing instrument.

Date: March 5, 2017



Signature of organizer

Thelma M. Anderson

Printed or typed name of organizer

Form 424

Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
FAX: 512/463-5709

Filing Fee: See instructions



**Certificate
of Amendment**

**Filed in the Office of the
Secretary of State of Texas
Filing #: 802672476 11/21/2017
Document #: 775717660002
Image Generated Electronically
for Web Filing**

Entity Information

The filing entity is a: **Domestic Limited Liability Company (LLC)**

The name of the filing entity is: **FEET TREATS Limited Liability Company**

The file number issued to the filing entity by the secretary of state is: **802672476**

Amendment to Name

The amendment changes the formation document of the filing entity to change the article or provision that names the entity. The article or provision is amended to read as follows:

The name of the filing entity is:

THELMA LOU Limited Liability Company

A letter of consent, if applicable, is attached.

Statement of Approval

The amendment has been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.

Effectiveness of Filing

- A. This document becomes effective when the document is filed by the secretary of state.
- B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of its filing by the secretary of state. The delayed effective date is: **November 22, 2017**

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and declares under penalty of perjury that the undersigned is authorized under the Texas Business Organizations Code to execute the filing instrument.

Date: **November 21, 2017**

Thelma M. Anderson

Signature of authorized person

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 87486451

Filing Date: 06/13/2017

*NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	Feet Treats: Treat Your Feet How You Want Your Feet To Treat You
*STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	Feet Treats: Treat Your Feet How You Want Your Feet To Treat You
*MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Anderson, Thelma
*STREET	2625 N State Hwy 360 apt 914
*CITY	Grand Prairie
*STATE (Required for U.S. applicants)	Texas
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. and certain international addresses)	75050
PHONE	3185720332
EMAIL ADDRESS	XXXX
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
LEGAL ENTITY INFORMATION	
*TYPE	LIMITED LIABILITY COMPANY
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Texas
GOODS AND/OR SERVICES AND BASIS INFORMATION	
*INTERNATIONAL CLASS	025

*IDENTIFICATION	Sandals
*FILING BASIS	SECTION 1(b)
ADDITIONAL STATEMENTS INFORMATION	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS) (if applicable)	
*CONCURRENT USE CLAIM (if applicable)	
CORRESPONDENCE INFORMATION	
*NAME	Anderson, Thelma
FIRM NAME	Anderson, Thelma
*STREET	2625 N State Hwy 360 apt 914
*CITY	Grand Prairie
*STATE (Required for U.S. addresses)	Texas
*COUNTRY	United States
*ZIP/POSTAL CODE	75050
PHONE	3185720332
*EMAIL ADDRESS	feetreats86@gmail.com; notifications@trademarkengine.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS Plus
NUMBER OF CLASSES	1
FEE PER CLASS	225
*TOTAL FEE PAID	225
SIGNATURE INFORMATION	
* SIGNATURE	/Thelma Anderson/
* SIGNATORY'S NAME	Thelma Anderson
* SIGNATORY'S POSITION	Officer
SIGNATORY'S PHONE NUMBER	3185720332
* DATE SIGNED	06/13/2017

United States of America

United States Patent and Trademark Office



THELMA LOU

Reg. No. 5,710,890

Registered Mar. 26, 2019

Int. Cl.: 25

Trademark

Principal Register

THELMA LOU, LLC. (TEXAS LIMITED LIABILITY COMPANY)
P.o.box 223901
Dallas, TEXAS 752279998

CLASS 25: Footwear; Women's clothing, namely, shirts, dresses, skirts, blouses

FIRST USE 11-10-2018; IN COMMERCE 11-10-2018

The mark consists of the stylized letters "TL" on top of a reverse "TL" with a two diamond symbols in between and to the side; the design placed inside a circle and top of the wording Thelma Lou.

SER. NO. 87-707,057, FILED 12-04-2017



Andrei Iancu

Director of the United States
Patent and Trademark Office

PATENT (THELMA LOU)

Applied Oct 2018 Awarded Aug 2020

THELMA LOU APPARAL

- **LAUNCHED NOVEMBER 10, 2018**

Photos from apparel photo shoot

- **BAE SCHOLARSHIP BRUNCH**

Oct 2019 the flyer is attached

To Promote the Progress



of Science and Useful Arts

The Director

of the United States Patent and Trademark Office has received an application for a patent for a new and useful invention. The title and description of the invention are enclosed. The requirements of law have been complied with, and it has been determined that a patent on the invention shall be granted under the law.

Therefore, this United States

Patent

grants to the person(s) having title to this patent the right to exclude others from making, using, offering for sale, or selling the invention throughout the United States of America or importing the invention into the United States of America, and if the invention is a process, of the right to exclude others from using, offering for sale or selling throughout the United States of America, products made by that process, for the term set forth in 35 U.S.C. 154(a)(2) or (c)(1), subject to the payment of maintenance fees as provided by 35 U.S.C. 41(b). See the Maintenance Fee Notice on the inside of the cover.

Ander Lane

DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

The #BAE Collection was created last year to glorify and uplift professional men and women within their respective professions.

Thelma Anderson CEO



@_thelmalou



CULTURE CLUB
PRICES \$

HAIR CUTS	
HAIR CUT & BLEND	
BLEND TRIM	
HAIR TONER, SHINE	
HAIR COLOR	
BRIDAL BLOWOUT	75
KITIS	25

**The Juneteenth Line was released
June 2020 during the
John Cruzot Administration under
Thelma Lou LLC**

JUNETEENTH

A DAY OF RECOGNITION, RESTORATION, CELEBRATION



6/19/1865

**25% Off : Code
Free**

The Bae Brunch

SCHOLARSHIP FUNDRAISER
mythelmalou.com | @_thelmalou



WE'RE INVITING ALL BAES

DOCTORS

NURSE

TEACHERS

CHEF

TRAINERS

TECH

MAKE UP ARTISTS

ENTREPRENEURS

HAIR STYLISTS

ENGINEERS

REALTORS

LAWYERS

AND BASICALLY
EVERY PROFESSION

**COME BRUNCH
WITH US**

MAGGIANO'S LITTLE ITALY
NORTH PARK CENTER, 205 N PARK CENTER, DALLAS, TX 75225
OCTOBER 13, 2019 1:00-3:30 PM

THELMA LOU BAE COLLECTION LAUNCH

- **ONESIE COLLECTION LAUNCHED
CHRISTMAS 2019**
- **PAGE 39-44**

**"The sales post was made on
December 19, 2019, during
the Faith Johnson administration.
John Creuzot and Paul Hamilton
were not employed at the time,
yet they falsely informed
the federal government that
I did not have authority,
nor was I authorized,
to operate my company."**

9:08



5G+ 54



Dec 19



All Smalls are Sold Out



137 viewers



Antonio L. Lewis II



Yung Kang



Share



Feature



Lou Anderson Dec 19



The last 4 onesies are

\$20.00

No Code Needed



WWW.MYTHELMALOU.COM

@_thelmalou

Your stories from 5 years ago

Look back on these moments from your story archive.



"This is a text message from my supervisor, Shawnkeedra Martin, who requested a meeting with me to inform me that I needed to hire models for my onesie line under Thelma Lou. I also had a meeting with my Family Violence supervisor, Jerry Varney who stated that I needed to hire models as well. This all occurred in January 2020, during the John Creuzot administration. At no point was I told to stop my operations. However, Paul Hamilton later lied and claimed that I was prohibited and not authorized to operate Thelma Lou." The link to verify my persence can be confirmed by pulling the badge scans on January 22, 2020.



Shawnkeedra >

Jan 22, 2020 at 10:28 AM

Hey! Can you come to my office ASAP please?

Jan 22, 2020 at 3:53 PM

Thank you for giving me a heads up and keeping it real like always. I really appreciate you for that ❤️

Always! You're so welcome 🙌

Jan 23, 2020 at 12:40 PM

Sooo... obviously my advice to you went on deaf ears because I see you still have the pics and videos up.

No they were apart of a promotion which I have to go up the chain to get them removed because once it's a sponsored post that you paid for you can't remove them without Instagram removing them from your business page. I have never had this issues of needing to have them removed which is why it's not a quick fix for me because both of my pages are not personal but have been approved business pages. I'm working on it.

Ok cool that's good



Shawnkeedra >

Ok cool that's good

Who spying on me??

I told you that upper mgmt has their eyes on you. I'm just trying to help you...

I appreciate that, but there is someone who don't know the facts reporting wrong information which made you feel like I wasn't listening and I don't like that.

No they didn't give me wrong info because it's still up, but you've explained it now so we're good 🤔❤️

Soooooooo I don't get to know who the social media spy is????? 🤔👩

Nope

"The next page includes email communication between myself and Paul Hamilton from October 2021, when he called me to his office to discuss Telelawyer.

We had a meeting, the requested corrections were made, and he never addressed any other concerns. He certainly did not state that I was prohibited from operating Thelma Lou or any other business.

This would have been his opportunity but I was allowed to continue my operations.

The page following the emails shows that John Creuzot viewed my LinkedIn profile on December 15, 2021."

Yaessy Pritchett

From: Paul E. Hamilton
Sent: Friday, October 22, 2021 4:02 PM
To: Thelma Anderson
Subject: RE: Check-in

I am here now. Been out of the office more than anticipated today.

Paul E. Hamilton

From: Thelma Anderson <Thelma.Anderson@dallascounty.org>
Sent: Friday, October 22, 2021 3:12 PM
To: Paul E. Hamilton <pehamilton@dallascounty.org>
Subject: RE: Check-in

Good Afternoon Paul,

I stopped by almost an hour ago. If you are free ill come back up.

From: Paul E. Hamilton <pehamilton@dallascounty.org>
Sent: Thursday, October 21, 2021 5:48 PM
To: Thelma Anderson <Thelma.Anderson@dallascounty.org>
Subject: RE: Check-in

Yes. I will be available tomorrow afternoon.

Paul E. Hamilton

From: Thelma Anderson <Thelma.Anderson@dallascounty.org>
Sent: Wednesday, October 20, 2021 9:18 AM
To: Paul E. Hamilton <pehamilton@dallascounty.org>
Subject: Check-in

Good Morning Paul,

Hope your week is going great. By chance do you have time Friday afternoon so that I can update you regarding the request that was made? I have meetings at Irving PD this afternoon and Garland Crime Lab tomorrow afternoon.

Thank you,

Medric Johnson • 1st
ent & CEO of SEDSERVER,
Inc.
und you via My Network

Jonathan A. Morrison (he, hi...
Improving Quality of Life & Place
Phillip Yates and 19 others

Dr. Belay D. Reddick • 3rd
Published Author | Leading
Keynote Speaker | From Ex-fe...

Message

Connect

InMail



2w



3w



4w

Someone at Dot Com Media

John Creuzot • 2nd
Dallas County Criminal District
Attorney at Dallas County...
Found you via My Network

Someone at University Growth
Fund

Follow Dot Com Media

Audrey Moorehead and 14 others

Follow University Growth Fund

Follow

Connect

Follow



1mo



1mo



1mo

Jonathan R. Everhart • 1st
Chairman & CEO | Entrepreneur |
Global Digital Economy Policy...

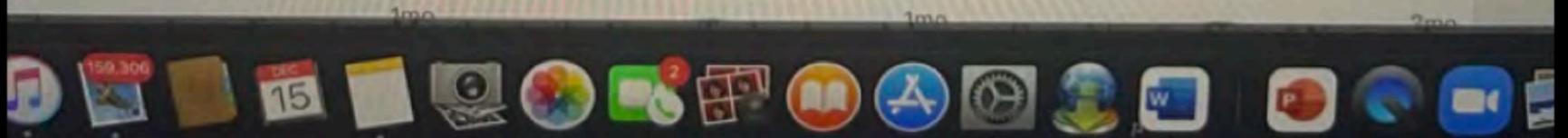
Robyn A. Tate • 3rd
Southern University and A&M
college

Michael Noordsy • 1st
Partner at The Bassett Firm
Found you via Messaging

Message

InMail

Message



MacBook Pro

Why the DA stalking my page



Preferably you should refrain from disclosure in doubtful cases and refer any inquiries to the District Clerk or state authorities.

Section 2.19 Outside Employment

No employee of this Office will engage in outside employment on County time. Any after hours outside employment must be discussed with the employee's immediate supervisor to be ensure that no conflict of interest exists. Outside employment must be approved by the First Assistant District Attorney.

Section 2.20 Private Practice

Private practice of law is prohibited, except as provided herein. The purposes of this rule are to ensure the State and County have the Assistants' full time attention and to ensure there are no conflicts of interest. A violation of this rule will be grounds for disciplinary action up to and including termination of employment.

An Assistant may, however, represent a member of his or her family in an uncontested civil matter provided no court appearance is required. Naturally, no indicia of private law practice whatsoever is permitted and none of the facilities or employees of the District Attorney's Office should be used in such representation.

Effective September 1, 1993, the legislature provided that prosecutors may provide pro bono representation to the indigent if "providing the services does not interfere with the prosecutor's official duties or regularly compensated hours of employment." See Section 41.14, Government Code. Representation of any person under these legislatively approved circumstances must have the prior approval of the District Attorney or First Assistant in order to ensure that no conflict of interest exists.

Section 2.21 Conflict of Interest

No employee of the District Attorney's Office shall take any action on a case in which he or she has a personal interest or connection. If any employee has a personal interest or connection to any case in the Office, he or she must bring this information to the attention of the First Assistant District Attorney.

No employee of the District Attorney's Office may solicit or accept any benefit from any person against whom criminal charges are filed or contemplated from their attorneys or representatives, or from any individual having an interest in a matter within the jurisdiction of the District Attorney.

The Texas Rules of Professional Conduct provide that a lawyer serving a government agency should not "participate in a matter involving a private client when the lawyer [has previously] represented that client in the same matter while in private practice or non-governmental employment" Tex. Disciplinary Rules of Professional Conduct, 1.10(e)(i). Accordingly, any such lawyer who is hired by this office as an Assistant District Attorney shall be screened from

**On the next page
John Creuzot and Paul Hamilton false
statement to the federal government is
confirmed by the memo when I was
wrongfully terminated but stated their
justified reason was for Tell A Lawyer but
told the Federal Gov it was because of
Thelma Lou. They never mentioned
Thelma Lou in this memo
which was required. Another lie**



JOHN CREUZOT
CRIMINAL DISTRICT ATTORNEY
DALLAS COUNTY, TEXAS

SEPARATION MEMORANDUM

DATE: March 25, 2022
TO: File
FROM: Paul E. Hamilton, First Asst. District Attorney
RE: Termination of Employment

PH

The challenge that we are experiencing is that we have a duly appoint Assistant District Attorney, Thelma Anderson, that is operating an outside enterprise that offers legal services to the public. The services offered have no legitimate relationship whatsoever to the work of the District Attorney's Office. In fact, the services offered to the public are contrary to the services rendered by this office to the public. In all regards, the services offered exceed the practice areas of the criminal division of the office.

On or about **October 15, 2021**, it was discovered that Assistant District Attorney Thelma Anderson was running a side practice under the name **Tell a Lawyer Group**. The business has a domain, TellALawyerGroup.com. Said business solicits clients for various legal consultations and services, including but not limited to consultations regarding the formation of business entities, risk and compliance management, intellectual property considerations, partnership agreements, crisis management and the like. The site goes on to tout the legal training, experience and expertise of the business' owner, in this instance Ms. Anderson. Her photos are prominently featured on each page of the website.

The District Attorney's Office has a specific prohibition against prosecutors engaging in the practice of law while simultaneously serving in the official capacity an Assistant District Attorney. The policy provides as follows:

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Dallas County District Attorney's Policy Manual, Section 2.19, provides as follows:

Private practice of law is **prohibited**, except as provided herein. The purposes of this rule are to ensure the State and County have the Assistants' full time attention and to ensure there are no conflicts of interest. An Assistant may, however, represent a member of his or her family in an uncontested civil matter provided no court appearance is required. Naturally, **no indicia of private law practice whatsoever is permitted** and none of the facilities or employees of the District Attorney's Office should be used in such representation. (emphasis added)

A copy of this policy is provided to all Prosecutors during the onboarding process at the time of initial employment and/or at the beginning of each new elected District Attorney's term of office. Ms. Anderson was provided a copy of this policy, as evidenced by her acknowledgment on July 5,



JOHN CREUZOT
CRIMINAL DISTRICT ATTORNEY
DALLAS COUNTY, TEXAS

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At our meeting on October 15, 2021, Ms. Anderson was admonished in no uncertain terms that the outside practice was not permitted and that she was to cease providing or offering to provide legal services outside of her employment with this office. To date, she has continued to maintain the referenced website and to offer legal services to the public, contrary to office policy and the direct admonition of the District Attorney and his First Assistant.

Violation of Prohibition Against Outside Practice of Law

A sampling of the specific representations on the website include:

Opening page:

“Tell A Lawyer Consulting Group specializes in all aspects of business advisory services, from business formation and contracts to intellectual property. Our firm not only advises businesses, we also advise entertainers, artist, influencers, designers, and athletes.

Our extensive experience, knowledge, professionalism, and tailored approach helps us aid in the continued support and success of our clients. We are here to serve in the best interest of all your business needs, from simple to complex issues.”

“Questions posed to the public: Why do you need a Business Lawyer? What you need to know before starting an LLC. Why you should file a trademark.”

Under the Tab “About Us”, it goes on to state:

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Finally, under a subsequent tab entitled “Advisory Services”, it states as follows:

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“We know that starting a business can be scary. We also understand that anyone can form a business however, at Tell A Lawyer Consulting Group, we will help guide you through the process. We will advise you on the proper business entity that is tailored for your operational and strategic goals (i.e., partnership, LLC, corporation). The most important ingredient for your business is to properly structure it during the formation process. Establishing your business identity along with the proper documents in place will help protect and secure your business.”

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“In today’s global media environment, crises require a swift and sure-footed response, taking into account the subject matter and stakeholders involved. A crisis can put into jeopardy your reputation, financial stability, and key relationships around the world.”

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Conclusion and Management Response:

Because Ms. Anderson has violated the policy regarding the outside practice of law, was provided an opportunity to cease the practice and continues to do so after it was brought to her attention, the Office of the District Attorney is terminating Ms. Anderson's employment, effective **Friday, March 25, 2022.**

The next document is a Text Message from a colleague who sent this message after i was fired informing me that Paul Hamilton finally implemented a reporting requirement for outside business ventures or employment but lied to the federal goverment stating this policy was implemented in 2019 when he was not employed with Dallas County. I also attached the updated policy. Paul Hamilton told me that i was the reason he implemented this policy that is also in the recorded audio that I have and he restated during the unemployment hearing.

You got us in trouble lol



Sitting here reading Paul's email thinking about you 😂😂😂

Oh he sent a email 😱😱😱😱

Lol yeah what'd you think I was talking bout?

What did it say?

Basically everything you said they hemmed you up about

Making sure we don't practice law during business hours especially but not in general unless they have approved it

And how we can rep our family when it's approved

Basically it said, if you're earning money in any way besides your DA paycheck, run it by them or get fired lol

Protocols Re: Outside Employment for DA Staff



Paul E. Hamilton
To DA_STAFF

Yesterday

03/25/22

REMINDER RE: OUTSIDE EMPLOYMENT FOR ALL DA EMPLOYEES

No employee of the Office is permitted to engage in outside employment on County time. For the most part, this is [Monday through Friday](#) from 8:00 a.m. – 4:30 p.m. for this office. **Likewise and in conjunction, no employee is permitted to engage in outside employment of any sort or at any time that has not been approved per our office protocols. See DA Policy Manual, Sec. 2.19.** This applies to those that might seek outside employment in the future as well as **those of you that might be employed outside of the office now that did not follow the policy.** It applies as well to **outside businesses owned or operated by DA employees.** If you earn money, expect to earn money or offer any service(s) to the public, it applies. **We need to know about all outside employment opportunities and the proper approval must be documented in your employment file.**

Lastly, as a reminder there should be absolutely **no engagement in the private practice of law, except** as specifically permitted by office policy. See DA Policy, Sec.

Lastly, as a reminder there should be absolutely **no engagement in the private practice of law, except** as specifically permitted by office policy. See DA Policy, Sec. 2.20. The policy provides that in limited circumstances a prosecutor might be permitted to represent a member of his/her family in an uncontested civil matter that does not require any court appearances. For these purposes, “engagement in the practice of law” is interpreted broadly. To be on the safe side and not run afoul of the policy, please let me know of any desire to represent a member of your family in an uncontested matter.

The primary concerns administratively are first and foremost to steer clear of potential conflicts of interests, to avoid undue influence or the appearance of undue influence or representations, the proper and responsible management of public funds and resources, and to uphold the integrity of the office. Any employee that does not comply with these policies will be subject to discipline, up to and including termination of employment.

Paul E. Hamilton

First Assistant/Chief Administrator

Dallas County Criminal District Attorney’s Office

(P): [\(214\) 653-3600](tel:2146533600) (C): [\(214\) 490-5517](tel:2144905517)

[133 N. Riverfront Blvd.](#), LB19

[Dallas, Texas 75207-4399](#)



Shawnkeedra >

Jan 22, 2020 at 10:28 AM

My former and current supervisors, Shawnkeedra and Jerry Varney, called me to their office because Amber Greggs told them that my onesie line for Thelma Lou was inappropriate. I was advised that I could not model my own clothing brand and that I would have to hire models in which I did and is documented. . Does this look like I was not authorized and was prohibited from operating Thelma Lou? This also predates Paul Hamilton tenure as the First Assistant or my supervisors confirming his lack of authorization or authority

Hey! Can you come to my office ASAP please?

Jan 22, 2020 at 3:53 PM

Thank you for giving me a heads up and keeping it real like always. I really appreciate you for that ❤️

Always! You're so welcome 🥰

Jan 23, 2020 at 12:40 PM

Sooo... obviously my advice to you went on deaf ears because I see you still have the pics and videos up.

No they were apart of a promotion which I have to go up the chain to get them removed because once it's a sponsored post that you paid for you can't remove them without Instagram removing them from your business page. I have never had this issues of needing to have them removed which is why it's not a quick fix for me because both of my pages are not personal but have been approved business pages. I'm working on it.

Ok cool that's good



Shawnkeedra >

Ok cool that's good

Who spying on me??

I told you that upper mgmt has their eyes on you. I'm just trying to help you...

I appreciate that, but there is someone who don't know the facts reporting wrong information which made you feel like I wasn't listening and I don't like that.

No they didn't give me wrong info because it's still up, but you've explained it now so we're good 🤔❤️

Soooooooo I don't get to know who the social media spy is????? 🤔👩

Nope

MEMORANDUM

To: File

From: Paul E. Hamilton, First Asst. District Attorney 

Date: October 18, 2021

Re: Prohibited Practice of Law (Thelma Anderson)

On Friday, October 15, 2021, District Attorney John Cruzot and I met with Ms. Anderson about her outside law practice activities. Ms. Anderson appears to be operating a law practice under the name TellALawyerGroup.com. The website for the practice has several photos of Ms. Anderson. It appears that she is the only practitioner. The site solicits clients for business legal concerns, to include intellectual property, contracts, setting up a small business, commercial interests, and the like. The contact number for a consultation is provided as 469-623-8009. Ms. Anderson was advised of the clear prohibition against practicing law outside of her capacity as an Assistant District Attorney.

Ms. Anderson attempted to minimize the activity by explaining that it was a mock site to support some patent or trademark effort that she was pursuing. She said that she was not attempting to solicit clients nor to provide legal services of any kind. **I advised Ms. Anderson that it appeared completely to the contrary, and that if her assertion were true, then she needed to make it clear on the opening page of the site, and on each substantive page thereafter, that no legal services are solicited, offered or provided.**

After much back and forth, and confusing denial by Ms. Anderson, DA Cruzot advised Ms. Anderson in no uncertain terms that she needed to decide whether she wanted to work here as an ADA or pursue her outside practice interests. It would not be tolerated to practice law outside of this office.

Ms. Anderson's activities in these regards will be monitored for compliance with office policy as well as the discussion of the date referenced.



JOHN CREUZOT
CRIMINAL DISTRICT ATTORNEY
DALLAS COUNTY, TEXAS

SEPARATION MEMORANDUM

DATE: March 25, 2022
TO: File
FROM: Paul E. Hamilton, First Asst. District Attorney
RE: Termination of Employment

ph

The challenge that we are experiencing is that we have a duly appoint Assistant District Attorney, Thelma Anderson, that is operating an outside enterprise that offers legal services to the public. The services offered have no legitimate relationship whatsoever to the work of the District Attorney's Office. In fact, the services offered to the public are contrary to the services rendered by this office to the public. In all regards, the services offered exceed the practice areas of the criminal division of the office.

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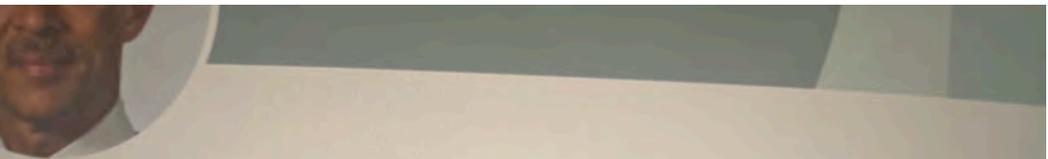
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JOHN CREUZOT
CRIMINAL DISTRICT ATTORNEY
DALLAS COUNTY, TEXAS

Conclusion and Management Response:

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Creuzot · 2nd

County Criminal District Attorney at Dallas County District Attorney's Office

Texas, United States · [Contact info](#)



Dallas County Attorney



Southwestern University of Law

Connections

15 mutual connections: Audrey Moorehead, Martin Hoffman, and 13 others

Connect

Message

More

- Share profile in a message
- Save to PDF
- Follow
- Report / Block

Highlights

You both work at Dallas County Criminal District Attorney's Office

John started at Dallas County Criminal District Attorney's Office

Say hello

About

...ed judge and now full-time criminal defense attorney John Creuzot is a nationally recognized ...ts, criminal justice reform and evidence-based sentencing. Judge Creuzot served as a State D ...as County for 21 years and pioneered Dallas County's first drug court, the Dallas Initiative for E



Medric Johnson • 1st
President & CEO of SEDSERVER,
Inc.
Found you via My Network

Message

Jonathan A. Morrison (he, hi...)
Improving Quality of Life & Place
Phillip Yates and 19 others

Connect

Dr. Belay D. Reddick • 3rd
Published Author | Leading
Keynote Speaker | From Ex-fe...

InMail

2w

Someone at Dot Com Media

3w

John Creuzot • 2nd
Dallas County Criminal District
Attorney at Dallas County...
Found you via My Network
Audrey Moorehead and 14 others

Connect

4w

Someone at University Growth
Fund

Follow University Growth Fund

Follow

Follow Dot Com Media

Follow

1mo

Dr. Jonathan R. Everhart • 1st
Chairman & CEO | Entrepreneur |
Global Digital Economy Policy...

Message

1mo

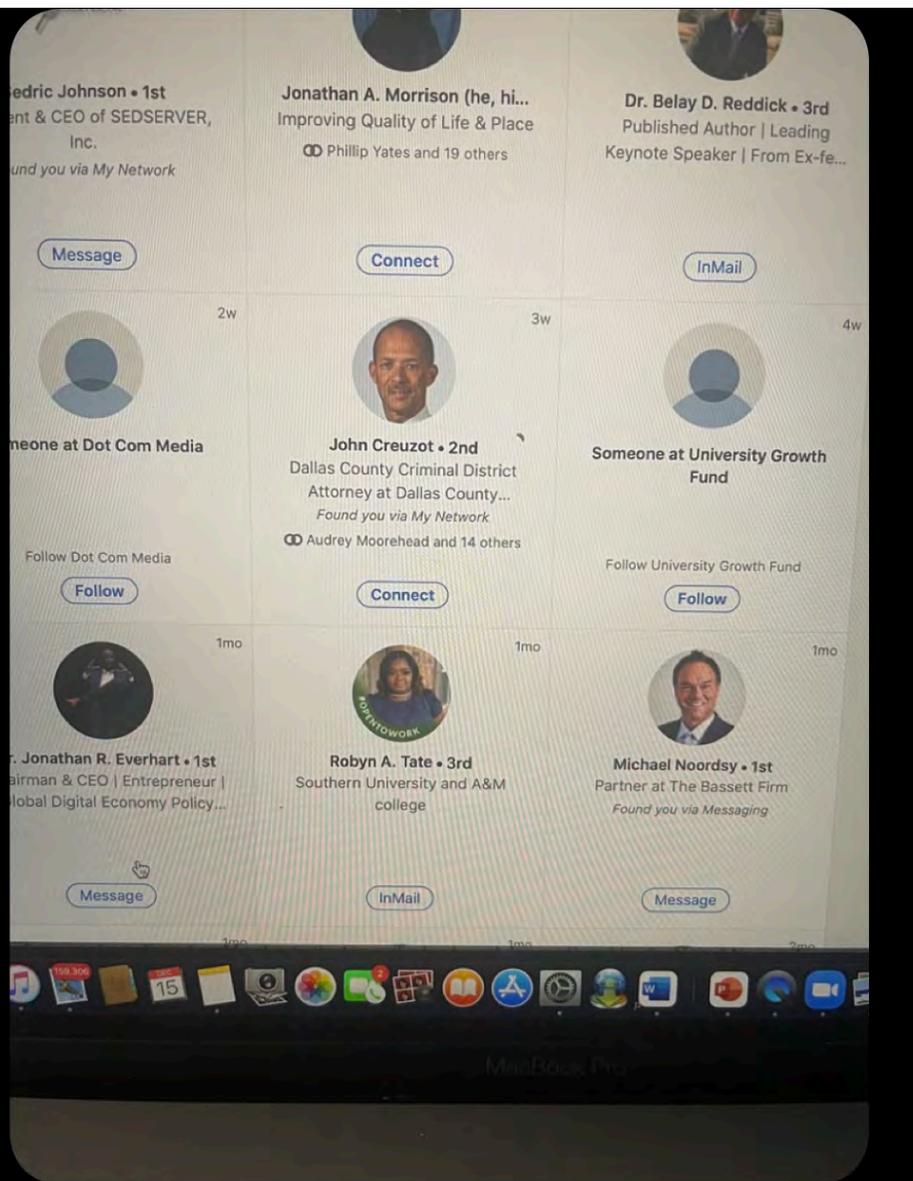
Robyn A. Tate • 3rd
Southern University and A&M
college

InMail

1mo

Michael Noordsy • 1st
Partner at The Bassett Firm
Found you via Messaging

Message



Why the DA stalking my page

Very creepy and I'm blocking his ass



Thelma Anderson <thelma.anderson10@gmail.com>

Notice to Retract attached

3 messages

Thelma Anderson <thelma.anderson10@gmail.com> Tue, Apr 8, 2025 at 4:21 PM
 To: "chong.choe@dallascounty.org" <chong.choe@dallascounty.org>, "raven.williams@dallasocunty.org" <raven.williams@dallasocunty.org>
 Cc: stephanie.bacon@dallascounty.org

Good afternoon,

Attached is a Notice to Retract which has also been sent to you via certified mail and will be delivered by USPS.

You have 30 days from today to retract the information outlined in the notice.

Please feel free to contact me regarding the retraction and the completion of the notice.

Sincerely,

Thelma Anderson
469-623-8009

 **RETRACT NOTICE.pdf**
10977K

Mail Delivery Subsystem <mailer-daemon@googlemail.com>
To: thelma.anderson10@gmail.com

Tue, Apr 8, 2025 at 4:21 PM



Address not found

Your message wasn't delivered to **raven.williams@dallasocunty.org** because the domain dallasocunty.org couldn't be found. Check for typos or unnecessary spaces and try again.

NOTICE TO RETRACT

Pursuant to Texas Civil Practice & Remedies Code §§ 73.051–73.06

Date: April 8, 2025

From:

Thelma Anderson
8204 Elmbrook Dr Suite 263
Dallas Texas 75237

info@tellalawyergroup.com

469-623-8009

Sent via: USPS Certified Mail and Electronic Email

To:

Chong Choe
Raven Williams
Assistant District Attorney
Dallas County District Attorney's Office – Civil Division
500 Elm Street, Suite 6300
Dallas, Texas 75202

RE: Demand for Retraction of Defamatory Statements Regarding Thelma Anderson

Dear Ms. Choe,

This is a formal **Notice to Retract**, issued on behalf of Thelma Anderson in accordance with the **Texas Defamation Mitigation Act (DMA)**, concerning false, defamatory, and injurious statements published and disseminated by or with the direction and knowledge of the Dallas County District Attorney's Office, District Attorney John Creuzot, and Assistant District Attorney Paul Hamilton.

On March 7, 2025, I submitted a lawful **Texas Public Information Act (TPIA)** request to the Dallas County District Attorney's Office regarding the allegations made against Ms. Anderson. To date, your office has failed to provide the requested documentation or cite any exception under the TPIA, which raises concern over the lack of substantiation for the defamatory statements made.

Legal and Factual Grounds for Retraction

These statements are factually false, misrepresentation, misleading, abuse of power, abuse of oath and harmful. The claim that Ms. Anderson lacked permission, was prohibited from operating her business Thelma Lou in 2019 implies wrongdoing despite the lack of legal authorization and employment with the Dallas County District Attorney Office by John Creuzot, Paul Hamilton and their agents in 2019 to provide the false statement. These publications have damaged Ms. Anderson's business reputation, exposed her to public contempt, and constituted

defamation per se by accusing her of criminal conduct and professional impropriety in connection with Thelma Lou her outside business in 2019.

Summary of Some of the False Statements About Outside Employment Prohibition

Outlet | False Statement

NBC DFW "Anderson was never given permission or authorization to operate her business..."

Dallas Morning News "Anderson lacked the authority to operate a private business..."

FOX 4 News "Outside business operations were unauthorized and in violation of her role..."

These statements are not supported by evidence, and your pending Public Information Act request has yielded no documentation substantiating the DA's claim that Anderson's employment prohibited her from operating a lawful business.

Demand for Action (Pursuant to § 73.055 DMA)

You are hereby demanded to:

1. Issue a formal retraction of some of the identified statements listed above. You are responsible for contacting every new outlet, search engine, affiliates and social media accounts that have published and republished social media sties.
2. Post a public correction on the official Dallas County District Attorney's website.
3. Send written notification of the retraction to the following outlets:
 - a. NBC DFW
 - b. Dallas Morning News
 - c. FOX 4 News
 - d. MSN Search Engine
 - e. Google Search Engine
 - f. Bing Search Engine
 - g. Yahoo Search Engine
 - h. DuckDuckGo Search Engine
 - i. AOL Search Engine
 - j. Twitter
 - k. Instagram
 - l. Info-flash.com
 - m. Smashdatopic.com
 - n. Facebook Dallas Crime Breaking News
 - o. The Texan (Fort Worth newspaper/article)
 - p. WFAA
 - q. Every news outlet, affiliate and social media accounts.
4. Provide written confirmation of the above actions, including copies of correspondence with the media outlets, and the link to the public correction, to:
 - a. Thelma Anderson
 - b. The appropriate federal authority

Deadline for Compliance

You have **thirty (30) days** from the date of this notice to comply in full. If you fail to do so, Ms. Anderson will proceed with filing a civil defamation lawsuit against Dallas County, John Creuzot, and Paul Hamilton and every legal remedy afford to Ms. Anderson under Texas law. We urge your office to take this matter seriously and act without delay to mitigate the legal exposure and harm caused to Ms. Anderson.

Sincerely,



Thelma Anderson

Recommended Supporting Evidence

- **Official Oath of Office Records** – Obtain and review the 2019 Oath of Office filings for both District Attorney John Creuzot and Paul Hamilton to determine the exact date Hamilton assumed the role of First Assistant.
- **Access Card Scan Records** –
 - January 22, 2020 – Card scans for the 10th and 11th floors confirming my meeting with Shawnkeedra Martin and Jerry Varney, during which I was advised to hire models for Thelma Lou’s onesie line.
 - October 15–22, 2021 – Card scans for the 11th floor confirming my meetings with Paul Hamilton, where he advised me to place disclaimers on my website and explicitly stated he had no issue with Thelma Lou.
- **Personnel File Review** – Request and review my 2019 personnel file from the Dallas County District Attorney’s Office to confirm whether any outside employment/business prohibition or lack of authorization documentation exists.
- **Outside Employment Policy (Policy 2.19)** – Evaluate the written policy and related internal communications, including whether any written record exists prohibiting or denying authorization for me to operate or work for Thelma Lou or New York & Company, as required by policy from 2016-2019.
- **Memorandum**: October 2021 meeting where it states Thelma Lou was prohibited and not authorized.
- **Memorandum Termination**: Marc 25, 2022 where it states I was terminated for operating Thelma Lou LLC.
- **Federal Communications** – Review all federal correspondence and investigative records to identify the false statements made by Paul Hamilton, including inconsistencies across multiple occasions.
- **Texas Workforce Commission Records** – Obtain the decision, hearing audio, and transcript from the TWC proceedings, which confirm Hamilton’s prior admissions and his subsequent contradictions.

Criminal and Misconduct Complaint Against Paul Hamilton, First Assistant District Attorney

I am formally submitting this complaint to request a criminal and misconduct investigation **under seal**, into the actions of Paul Hamilton, First Assistant District Attorney for Dallas County. The evidence outlined below demonstrates a deliberate pattern of misrepresentation, abuse of authority, retaliation, and deception of federal officials that rises to the level of both professional misconduct and potential criminal conduct.

Timeline of Events

- **August 11, 2022** – Texas Workforce Commission Appeals Hearing held. Paul Hamilton made several admissions during the hearing, but later provided false statements to federal agents, prosecutors, and under oath.
- **August 2022** – Hamilton used his position as First Assistant DA to contact the federal government and submit a false complaint against myself and another Black prosecutor. This was an abuse of official capacity and an act of discriminatory targeting.
- **October 28, 2022** – Documentation received via email confirms Hamilton had been contacted by the federal government and received a subpoena to appear in court.
- **November 1, 2022** – Paul Hamilton testified under oath before the federal grand jury, where he committed perjury, a federal crime. His testimony included false statements regarding my outside employment and his authority under office policy; despite knowing he lacked contemporaneous knowledge and supervisory authority.
- **January 23, 2023** – Federal agents questioned Hamilton regarding my employment, outside business activity, and DA’s Office policy. Hamilton claimed: I never submitted or received authorization for outside employment; I was prohibited from outside employment under office policy; Policies were loosely enforced until “issues” with me came to light. He attached a Professional Responsibility Review Policy dated February 13, 2020.
- **January 25, 2023** – The AUSA requested clarification on the policy’s effective date and updates. Hamilton responded: The policy manual was last updated in January 2019; All employees signed off on the manual under the new administration; He joined the office in February 2019; The only change regarding outside employment occurred after I left and would not apply to me.

Additional Misrepresentation

- **False Position Claim** – Hamilton falsely represented to federal agents that he was the First Assistant during the relevant time periods 2016-2019. In fact, Kevin Brooks was the First Assistant until 2020; Hamilton did not assume the role until mid-2020. At the time in question, Hamilton was neither my immediate supervisor nor authorized to make determinations regarding outside employment under Policy 2.19. My business was already in operation prior to Hamilton’s employment and prior to becoming First Assistant. Nevertheless, Hamilton lied to the federal agent, under oath, and to the AUSA, falsely claiming authority he did not possess.

On **January 24, 2023**, Paul Hamilton in black and white stated to the Federal Agent: Addressing your questions, **Ms. Anderson did not submit any requests nor did she receive any authorization to take on outside employment during her time with us.** Yes, she was prohibited from having outside employment while with the office without express authorization. See Policy Manual Sec. 2.19 and Sec. 2.20, the latter specifically prohibiting the **outside practice of law. This employment policy was loosely enforced until many of the issues and complication raised by her activities came to light.** Mr. Hamilton's duty began when he was promoted to First Assistant mid 2020. At that point, he failed to update or properly implement office policies which, by his own admission, were **"loosely enforced" under his tenure as the first assistant.** The outside employment policy was not updated until **March 25, 2022, after he wrongfully terminated me without following the required policy and procedures stating I was the sacrificial lamb.** This failure was confirmed by the **Texas Workforce Commission**, which ruled that I was wrongfully terminated. More specifically, the Commission found that following our meeting in his office on **October 22, 2021**, Mr. Hamilton had a duty and responsibility under policy to follow up with me regarding the changes he requested be made to my website. His failure to follow up for more than six months constituted a violation of the policy not on the part of the employee, but on the part of Mr. Hamilton. During the hearing, Mr. Hamilton attempted to excuse this failure by stating that he had "500+ employees to look after" and could not focus on me. He intentionally didn't disclose this to federal agents when asked several times.

Mr. Hamilton's vendetta against me for losing the unemployment hearing became active shortly thereafter. This is confirmed by the fact that in **August 2022**, soon after he lost the hearing, he launched his scheme to defraud the federal government in retaliation against two former prosecutors. From his own statements, it is clear that he ultimately carried out this scheme by lying to the federal government, which culminated in his testimony under federal grand jury subpoena.

During that testimony, Mr. Hamilton **intentionally misrepresented his authority, misrepresented the policy, and falsely claimed that I was prohibited and not authorized to operate my business, work for New York & Company, or try a civil case** all activities that predated both his employment and his tenure as First Assistant. He **used his title, county resources, county time, and county email to legitimize his plot**, exploiting the power and credibility of his public office to manufacture legitimacy for his lies and he almost got away with it.

This was not merely poor judgment; it was a **deliberate abuse of power and unethical misuse of public office**, designed to settle a personal vendetta through fraud, retaliation, and deception at the federal level. This hearing is documented with the Texas Workforce Commission through Audio recording that will confirm that he intentionally lied to the federal government and failed to retract his misrepresentation which is required through his oath as a prosecutor, his oath as a lawyer and the oath he took when he testified before the federal grand jury.

Tell A Lawyer Misrepresentation and Retaliation – Hamilton misled federal agents into believing I was terminated because I was prohibited from outside employment and not authorized to operate Tell A Lawyer. This was false when Hamilton had personally granted me permission to continue operating Tell A Lawyer during our October 15, 2021, meeting, instructing only that disclaimers be placed on the website. **In the memo that Paul Hamilton wrote he stated the following: I advised Ms. Anderson that it appeared completely to the contrary, and that if her assertion were true, then she needed to make it clear on the opening page of the site, and on each substantive page thereafter, that no legal services are solicited, offered or provided. Ms. Anderson's activities in these regards will be monitored for compliance with office policy as well as the discussion of the date referenced.**

Does this memo prohibit or revoke my authorization?

Absolutely not. Paul Hamilton later told the federal government I was **prohibited** and **not authorized** to operate my business. But his own memo says the opposite.

What his memo actually does

- **Gives conditions, not a ban.** It says “*if [your assertions] were true, then [you] needed to make it clear... that no legal services are solicited, offered, or provided.*” That is a **content-disclaimer requirement**, not a prohibition.
- **Affirms continued operation with safeguards.** Directing me to add disclaimers presumes I may **continue operating** so long as the site is properly labeled.
- **Promises monitoring—not shutdown.** “*Ms. Anderson’s activities... will be monitored for compliance with office policy.*” **Monitoring** equals oversight of ongoing activity, not a revocation or suspension.
- **No prohibitory language anywhere.** The memo contains **no** verbs like “prohibit,” “revoke,” “suspend,” “cease,” or “terminate,” and **no effective date** or remedial sanction typical of an actual ban.
- **No policy mechanism invoked.** It does **not** cite or execute any revocation procedure (e.g., written notice from the proper supervisor under Policy 2.19). **No written prohibition** was issued.
- **Structure = conditional compliance.** The “if/then” structure creates a **path to compliance**, not an order to stop. It treats the issue as a **clarification** problem (disclaimers), not an authorization problem.

Omitted Facts Termination Memo

Paul Hamilton’s **post-termination memo rewrites the rules.** It **contradicts** his own instructions from **October 15, 2021**, and the **October 22, 2021**, follow-up, and it **omits** the fact that his October directive **did not prohibit or revoke** my authorization; it required disclaimers and promised monitoring. He also fails to disclose that on **December 15, 2021**, he knew his boss, **District Attorney John Creuzot**, had viewed my LinkedIn page proof they were actively monitoring my activity and had a **reasonable opportunity to confer** with me, yet **failed to follow up.**

Why this matters

- **Contradiction**: October = **disclaimers + monitoring** (conditional permission). The later memo pretends October was “**not permitted/cease.**”
- **Omission of duty**: After directing website changes, Hamilton had a **policy duty to review within a reasonable time**; he did not.
- **Knowledge & opportunity**: The 12/15/2021 LinkedIn view shows awareness and monitoring; still **no engagement** or written prohibition.
- **Shifted blame**: The later memo **erases his own obligations** and **pushes responsibility onto the employee**, despite the paper trail.
- **Ethical & oath failures**: This pattern highlights Hamilton’s **discrepancies, failure to follow policy, lack of follow-up,** and **breaches of his ethical duties, his oath of office, and his oath as a lawyer** culminating in **false statements to the federal government.**

Federal misrepresentation pattern

- In the post-termination memo, Hamilton **never mentions his instruction regarding Tell A Lawyer** and that I was never prohibited and not authorized to operate Thelma Lou yet later **told federal agents and the grand jury** that I was **prohibited and not authorized** to operate.
- That claim **directly conflicts and contradicts** with his October instruction (disclaimers + monitoring) and his failure to issue any written prohibition or revocation under policy which is nowhere to be found because I was never prohibited and not authorized.
- The inconsistency is **egregious** and supports an inference of **intentional misrepresentation** to conceal his policy failures leading to misleading the federal government and committing perjury.

Bottom line: The post-termination memo is a **post-hoc cover-up** narrative that contradicts the October record, **omits material facts,** and **conceals Hamilton’s own policy violations** to justify a result he never stated to me which I was required to have notice.

This is confirmed in my **audio recording of my termination meeting with Mr. Hamilton.** I anticipated that Mr. Hamilton would lie and use his position to **gaslight, manipulate, and legitimize his unethical behavior,** which is exactly what he attempted to do. He acted under the guidance and protection of **District Attorney John Creuzot, who promoted him to shield and cover up his misconduct.** I had to protect myself, and if I had not recorded him, **he would have gotten away with his crimes.** The audio proves that Mr. Hamilton deliberately used his position to lie, gaslight, and conceal his unethical behavior. The same audio that the federal government would love to hear how he manipulated agents into and committed several state and federal crimes. Without this recording, his misconduct would have been buried under the false legitimacy he tried to create through his title and office which is sick, twisted and diabolical. **Also during the meeting Paul Hamilton reiterated he did not have a problem with Thelma Lou LLC.** This is corroborated by the March 25, 2022, audio recording and the August 11, 2022, unemployment hearing recording, both confirming his approval. Hamilton lost the

unemployment hearing, and in retaliation, sought revenge by lying to the federal government, fabricating the narrative that I was prohibited and unauthorized.

Key Misconduct and Potential Crimes

- **False Statements to Federal Agents** – Contradictory and knowingly false statements under oath.
- **Abuse of Official Capacity** – Filing a false federal complaint against myself and another prosecutor.
- **Perjury** – Testifying falsely before the federal grand jury on November 1, 2022.
- **Misrepresentation of Position** – Falsely claiming to be First Assistant with authority he did not have in 2019.
- **Tell A Lawyer Retaliation** – Authorizing my work, then lying after losing an unemployment case.
- **Racially Discriminatory Conduct** – Targeting two Black prosecutors through false complaints.
- **Policy Misrepresentation** – Misleading the federal government about DA's office policies and their enforcement.
- **Obstruction of Justice** – Manipulating policy interpretations to mislead federal investigators.

Request for Action

I respectfully request that the Public Integrity Unit open a formal criminal investigation into Paul Hamilton's conduct for potential violations, including but not limited to:

- **Abuse of Official Capacity**
- **False Statements to Federal Agents**
- **Perjury before a Federal Grand Jury**
- **Official Oppression / Misuse of Authority**
- **Obstruction of Justice**
- **Retaliation**

His conduct has severely undermined the integrity of the Dallas County District Attorney's Office and corrupted the federal inquiry process. The administration sought to neutralize my credibility by constructing a false statement that was at the hands of Paul Hamilton the second person in command. The foundation of this claim was entirely fabricated. In 2019, the period they referenced, Paul Hamilton was not employed by the District Attorney's Office until February and did not become First Assistant until mid-2020. He had no legal, or supervisory authority to determine whether I had permission to operate a business or outside employment a business that was already in operation prior from 2019 under the Susan Hawk/Faith Johnson administration. The agent asked him specific questions, and he flat out lied. Paul never informed the federal agents that he did not become the first assistant until mid 2020, when 2019 was the subject of his false statements and misrepresentation where he proceeds to commit perjury under oath and under the oath as a Dallas County District Attorney and is oath as a Texas Attorney.

Nevertheless, Hamilton presented these false claims to federal agents, misrepresenting both the nature of my business and events that predated his tenure as the First Assistant. Using their official positions in August 2022, Hamilton under the guidance of John Cruzot and others accessed the channels to communicate directly with federal law enforcement. He **weaponized his role and institutional credibility** to push deliberate

lies, exploiting every procedural blind spot and cloaking himself in the appearance of authority. By relying on his standing as a public official his **position, power, and influence** he **manufactured false statements into legitimacy** and deliberately manipulated federal agents and federal prosecutors into advancing his scheme. This conduct was not a mistake or misunderstanding; it was a calculated abuse of office approved by John Creuzot that resulted in the **violation of multiple criminal statutes and core professional codes of conduct.**

This was not accidental. It was a calculated effort to **silence a whistleblower, derail public exposure of misconduct during the 2022 election season, and retaliate against someone who challenged the internal culture of their administration.** This retaliation was further validated by the **Texas Workforce Commission officer**, who ruled that Paul Hamilton did not follow office policy a finding that is unsurprising given that Hamilton also **lied under oath to federal agents and federal prosecutors.** He just didn't think he would get caught. In **April**, I sent over a **retraction notice** once I discovered that **Paul Hamilton and John Creuzot** were responsible for submitting false statements under oath to the federal government. I provided them an opportunity to retract those statements, and they **refused.**

The result was a weaponized misuse of public office: a coordinated campaign built on lies, fueled by retaliation, and executed through improper influence. The actions taken against me were not the product of independent federal investigation, but the direct outcome of Paul Hamilton manipulating federal processes to serve a personal vendetta in violation of his oath of office, oath as a lawyer and obligation to testify truthfully which he failed all three and a plethora of criminal offenses both state and federal.

Mr. Hamilton and District Attorney John Creuzot **directed the Civil Division to violate the Texas Office of Attorney General's Order dated May 23, 2025**, which required them to turn over all communications with the FBI, Federal Government, CIA, DEA, AUSA, and DOJ. Instead of complying, they deliberately withheld this information **to cover up their crimes plus more.**

This conduct is not only unlawful, but it also violates their **oath of office** as public officials and their **ethical duties as licensed attorneys.** Specifically, their actions constitute:

- **Ethical Violations (Rules of Professional Conduct)**
 - *Rule 3.03 (Candor Toward the Tribunal)* – failing to disclose material facts and actively concealing evidence.
 - *Rule 3.04 (Fairness in Adjudicatory Proceedings)* – obstructing access to evidence and defying a lawful order.
 - *Rule 8.04(a)(3) (Misconduct)* – engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation.
 - *Rule 8.04(a)(4) (Misconduct)* – conduct constituting obstruction of justice and knowingly violating a legal obligation.
 - *Violation of Oath as Attorneys* – failing to uphold the law and constitution while using their licenses as shields for corruption.

To date, I have been forced to file **three separate complaints** against every responsible party. Their **pattern of concealment and retaliation** reflects not just a breach of duty, but a systemic abuse of power intended to silence accountability and insulate themselves from criminal exposure.

REQUESTED ACTION (URGENT)

I am requesting a **full and thorough investigation** into **Paul Hamilton**. His conduct has fallen below his **oath of office**, his **oath as a lawyer**, and his **duty as a citizen** including **knowingly committing perjury** when he testified under oath before the federal grand jury.

Because of the proximity and power involved, I further request the **appointment of a special counsel** to lead this investigation under seal. A public official and his First Assistant have **gone so far as to falsely accuse two former prosecutors, lie under oath, and then attempt to cover up their actions**. This demands independent scrutiny under seal.

I also request that **Paul Hamilton be removed immediately from the position of First Assistant there is more than enough reasonable suspicion to place him on leave**. Every day he remains in office; the public is at risk. He is using his **position, title, and authority**, with support from **John Cruetzot**, to commit criminal and unethical acts while sitting in the **second-highest position in Dallas County** a role that affects people's lives and freedom. **This is not a game**. He is **playing with the criminal justice system**, and no individual should be subjected to the harm, deceit, and danger he poses while he retains power. My concerns are **urgent, legitimate, and well-founded** as a victim of **Paul Hamilton and John Cruetzot**, who continue to manipulate the legal system at not only my expense but the residents and taxpayers of Dallas County.

Requested Actions (Immediate)

1. **Appoint Special Counsel**. Assign an independent special counsel with full subpoena power, separate from the DA's chain of command.
2. **Immediate Removal / Suspension**. Place Paul Hamilton on immediate leave and strip his access to files and systems.
3. **Preservation & Production Orders**. Enforce the May 23, 2025, OAG Order requiring production of all communications with FBI, DEA, CIA, AUSA, DOJ, and federal agencies.
4. **Sworn Testimony**. Secure testimony from Hamilton, relevant AUSAs, Civil Division attorneys, and supervisors from the October 2021 and March 25, 2022 meetings.
5. **Bar Referrals**. Refer Hamilton and all implicated attorneys to the **State Bar of Texas** for professional misconduct.
6. **Anti-Retaliation Protections/Under Seal**. Guarantee immediate safeguards for myself and witnesses; establish a confidential channel to special counsel.
7. **Access Revocation & Audit**. Revoke Hamilton's access to county systems, preserve audit logs, and secure communications.
8. **Status Reporting**. Provide regular updates until the investigation concludes.

This investigation must be **sealed and protected**. **Disclosure of my name or this complaint to Paul Hamilton or John Cruzot would endanger my safety and my family's safety.** I do not trust these two leaders, and I do not trust that these individuals would refrain from retaliation or harm if alerted. This is the harsh reality I live with every day. **This is not a cry for help this is a cry for justice and accountability.**

I will **fully participate** under the guidance of my attorney. I will **not go public with this new evidence** without first giving your office the opportunity to review, investigate, and hold Mr. Hamilton accountable. I want a **fair and just process**, and I am giving you a fair and just opportunity to **correct misconduct** by your First Assistant misconduct that **affects every resident of Dallas County.**

Requested Actions (Immediate)

1. **Appoint Special Counsel.** Assign an independent special counsel with full subpoena power, separate from the DA's chain of command.
2. **Investigation under seal.**
3. **Immediate Removal / Suspension.** Place Paul Hamilton on immediate leave and strip his access to files and systems.
4. **Preservation & Production Orders.** Enforce the May 23, 2025, OAG Order requiring production of all communications with FBI, DEA, CIA, AUSA, DOJ, and federal agencies.
5. **Sworn Testimony.** Secure testimony from Hamilton, relevant AUSAs, grand jury testimony, all communication, not limited to AUSA's Michelle Winters Ryan Niedermair Katherine Schwethelm Special Agent
6. Dallas County Civil Division attorneys.
7. **Bar Referrals.** Refer Hamilton and all implicated attorneys to the **State Bar of Texas** for professional misconduct.
8. **Anti-Retaliation Protections.** Guarantee immediate safeguards for myself and witnesses; establish a confidential channel to special counsel.
9. **Access Revocation & Audit.** Revoke Hamilton's access to county systems, preserve audit logs, and secure communications.
10. **Status Reporting.** Provide regular updates until the investigation concludes.