



FILED

Jun 15 2026

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

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 MOTION FOR RECONSIDERATION AND NARROW REQUEST TO
REDACT PRIVATE INFORMATION**

TO THE HONORABLE BOARD OF DISCIPLINARY APPEALS:

Respondent respectfully moves for reconsideration of the Board's prior denial of her request to redact private information from public-facing disciplinary materials. This motion seeks only narrow redaction of Respondent's residential address, personal contact information, and other personal identifying information from records, pleadings, exhibits, transcripts, recordings, and related public materials maintained by the Board.

I. RELIEF REQUESTED

Respondent requests an order:

1. reconsidering the Board's prior denial of redaction;
2. redacting Respondent's residential address, personal contact information, and other personal identifying information from public-facing Board materials; and
3. replacing any public version of a document, transcript, exhibit, or recording containing such information with a redacted version.

Respondent does not seek to seal the proceeding, vacate the disciplinary matter, or prevent public access to the merits of the case. The request is limited to personal identifying information that serves no legitimate public purpose and that has created documented safety risks.

II. INTRODUCTION

The Board previously denied Respondent's request despite actual notice that public dissemination of her private information had already resulted in harassment, threats, repeated unwanted calls, individuals appearing at Respondent's residence, and police involvement. The Board also had notice that Petitioner did not oppose redaction of Respondent's home address. Since the denial, the harm has not abated. On or about June 10, 2026, publicly available disciplinary materials were republished through social media and other public channels, and Respondent experienced renewed harassment and threats. That escalation confirms the need for narrow redaction now.

This motion does not ask the Board to suppress the substance of the disciplinary proceeding. It asks only that the Board redact personal identifying information that exposes Respondent to harm.

III. FACTUAL BACKGROUND

On February 6, 2026, the Board contacted the parties regarding scheduling and asked whether February 9, 2026, was acceptable. Respondent advised that the date did not work because of pre-scheduled medical appointments.

Respondent filed a motion for continuance and provided proof of her schedule. The Board nevertheless set the hearing on short notice.

On February 6, 2026, at approximately 6:46 p.m., after normal business hours, the Board issued notice setting the hearing for February 12, 2026. The notice did not advise Respondent of any procedure for objecting to public dissemination of her personal identifying information or for requesting redaction.

On February 10 and 11, 2026, Petitioner submitted additional exhibits outside the ordinary timeframe. Respondent promptly objected and re-urged her motion to abate due to lack of time to investigate.

At the February 12, 2026, hearing, Respondent was not given meaningful notice that she could object to public recording or public dissemination of personal identifying information. No procedure was provided for requesting confidentiality or redaction.

On March 9, 2026, Respondent notified the Board that dissemination of her private information had already resulted in harassment, threats, unwanted calls, individuals appearing at her residence, and police involvement. She specifically requested redaction of her residential address and other personal identifying information from public materials.

On March 16, 2026, CDC Trial Attorney Ramiro Canales advised that, if Respondent was contemplating filing a motion to redact her home address from pleadings on file with the Board, Petitioner was unopposed.

The Board denied Respondent's request. Since that denial, the public availability and republication of the same materials have continued to expose Respondent to further harm.

IV. ARGUMENT

A. The Board had actual notice of existing harm before denying redaction.

Respondent's original request was grounded in actual, not speculative, harm. Before the Board denied relief, Respondent had already reported harassment, threats, unwanted calls, individuals appearing at her residence, and police involvement arising from the disclosure of her personal information.

The Board therefore knew that continued public dissemination of Respondent's identifying information created a real and ongoing safety risk. Narrow redaction is the appropriate response to that risk.

B. Petitioner did not oppose redaction of Respondent’s home address.

Petitioner expressly stated that it was unopposed to redacting Respondent’s home address from pleadings on file with the Board. That position confirms that at least one core item of requested relief was not contested.

Because the requested relief is limited to personal identifying information and does not affect the merits of the disciplinary case, the Board may grant redaction without impairing public access to the substance of the proceeding.

C. Respondent did not knowingly waive the protection she seeks.

Waiver requires a knowing and intentional relinquishment of a known right. *Jernigan v. Langley*, 111 S.W.3d 153, 156 (Tex. 2003). Silence does not establish waiver where no meaningful procedure was provided to assert the right at issue. *Tenneco Inc. v. Enter. Prods. Co.*, 925 S.W.2d 640, 643 (Tex. 1996).

Here, the Board’s notices did not explain that Respondent’s personal identifying information would be publicly disseminated, did not advise her of any mechanism to request redaction, and did not inform her that failing to object would waive privacy or safety protections. On this record, the Board should not infer waiver.

D. June 10 confirms that the harm continued after denial.

On or about June 10, 2026, publicly available disciplinary materials were republished through social media and other public channels. After that republication, Respondent experienced renewed harassment and threats.

June 10 is important because it confirms that the danger was continuing and had escalated after the Board denied relief. That post-denial escalation supports reconsideration of the Board’s earlier ruling and shows why narrow redaction remains necessary.

E. Material Change in Circumstances Warrants Reconsideration

Even if the Board previously determined that redaction was unwarranted, reconsideration is appropriate because the factual circumstances before the Board have materially changed since the denial of Respondent's original request.

Prior to the denial, Respondent advised the Board that publication of her residential address and personal identifying information had already resulted in harassment, threatening communications, repeated unwanted calls, individuals appearing at her residence, and police involvement.

Since the denial, on June 10-12, 2026, publicly available disciplinary materials that include my private information have been republished and disseminated through social media platforms and other public channels. Respondent has attached evidence demonstrating that those materials were further distributed to a broader audience, resulting in renewed harassment, threatening communications, anonymous calls, death threats, threatening voicemails, cyberstalking, intimidation, threats to come to my residential address and continued dissemination of Respondent's personal information.

Respondent has further provided evidence that she was forced to change personal and business telephone numbers due to ongoing harassment and threats arising from continued publication of information contained within Board-maintained records and recordings.

The issue before the Board is therefore not whether Respondent identified a theoretical risk of harm. The issue is whether the Board should continue to permit dissemination of information after receiving evidence that the very harms previously identified by Respondent have continued and escalated.

These developments constitute a material change in circumstances sufficient to warrant reconsideration of the Board's prior ruling.

F. Due Process Requires Meaningful Notice and a Meaningful Opportunity to Protect Privacy Interests

The Fourteenth Amendment to the United States Constitution and Article I, Section 19 of the Texas Constitution guarantee fundamental principles of due process.

Due process requires notice reasonably calculated to apprise an individual of the nature of proceedings affecting protected interests and a meaningful opportunity to assert available rights and protections. See *Peralta v. Heights Medical Center, Inc.*, 485 U.S. 80 (1988).

Respondent was not advised that personal identifying information contained within disciplinary materials would remain publicly accessible through recordings, transcripts, exhibits, and related materials. Nor was Respondent provided any meaningful procedure by which she could seek protection of her personal identifying information before such information became publicly disseminated.

The Board's notices did not advise Respondent that failure to seek redaction before publication would be treated as a waiver of privacy protections. The record further reflects that Respondent promptly sought relief once she became aware of the dissemination and resulting harm.

Waiver requires a knowing and intentional relinquishment of a known right. *Jernigan v. Langley*, 111 S.W.3d 153, 156 (Tex. 2003). A waiver should not be implied where an individual is not provided meaningful notice of the right allegedly relinquished or the procedures necessary to assert it. See *Tenneco Inc. v. Enterprise Products Co.*, 925 S.W.2d 640, 643 (Tex. 1996).

Under these circumstances, Respondent respectfully submits that the Board should not infer waiver and should instead consider the merits of Respondent's request for narrowly tailored redaction of personal identifying information.

G. Actual Harm Demonstrates That Narrow Redaction Is Necessary

Respondent's request is supported by substantial evidence of actual harm.

- Repeated threatening communications;
- Harassing emails;
- Anonymous telephone calls;
- Threatening voicemail messages;
- Cyberstalking and online harassment;
- Republication of disciplinary materials through social media;
- Dissemination of personal identifying information to third parties;
- Business disruption;

- Police involvement;
- Doxing; and
- Continuing safety concerns.

Unlike cases involving speculative privacy concerns, Respondent's request is supported by documented evidence establishing that publication of personal identifying information has already resulted in real-world harm.

The requested relief is therefore narrowly tailored to address a demonstrated safety concern while preserving public access to the substance of the disciplinary proceeding.

H. Equity Favors Redaction

The balance of equities strongly favors granting Respondent's request.

Petitioner previously advised that it did not oppose redaction of Respondent's residential address.

The public's ability to understand the disciplinary proceeding will not be impaired by removal of Respondent's residential address, personal contact information, and other personal identifying information.

By contrast, denial of relief permits continued dissemination of information that has already resulted in harassment, threats, intimidation, stalking, cyberstalking, doxing, and documented safety concerns.

Because the requested relief imposes little burden upon the Board while significantly reducing the risk of continued harm, equity weighs heavily in favor of granting Respondent's request.

I. The Board Possesses Actual Notice and the Ability to Mitigate Continuing Harm

This case presents a unique circumstance in which the Board was placed on actual notice that public dissemination of Respondent's personal identifying information had already resulted in harassment, threats, unwanted communications, individuals appearing at Respondent's residence, and police involvement before the Board denied Respondent's original request.

Respondent specifically requested removal of publicly available recordings, redaction of her residential address, and protection of personal identifying information. Petitioner expressly advised that it did not oppose redaction of Respondent's residential address. Despite that notice and lack of opposition, the Board denied Respondent's request.

Since that denial, the same materials have continued to be publicly available and have been republished through social media and other public channels. The resulting dissemination has subjected Respondent to renewed threats, intimidation, anonymous communications, cyberstalking, racial harassment, threatening voicemails, and additional safety concerns.

The Board now possesses information that was not before it when it initially denied relief, including evidence demonstrating that the harm identified by Respondent has continued and intensified.

Respondent respectfully submits that this Motion does not seek extraordinary relief. Respondent seeks only the removal or redaction of personal identifying information that serves no legitimate public purpose and that has already resulted in documented harm.

The requested relief is narrowly tailored, minimally burdensome, and consistent with preserving public access to the disciplinary proceedings while protecting Respondent's personal safety and privacy interests.

Under these circumstances, reconsideration is warranted, and the Board should exercise its authority to remove, redact, restrict, or otherwise protect Respondent's personal identifying information from further public dissemination.

J. Alternative Request for Limited Protective Relief

In the alternative, if the Board declines to remove or redact all requested materials, Respondent respectfully requests that the Board enter a limited protective order requiring, at a minimum:

1. Immediate redaction of Respondent's residential address;
2. Immediate redaction of personal telephone numbers, email addresses, and other direct contact information;
3. Removal of any recordings containing verbal disclosure of Respondent's residential address;
4. Removal or replacement of exhibits containing personal identifying information;
5. Future publication of only redacted versions of records and recordings; and
6. Any additional relief the Board deems appropriate to prevent continuing dissemination of Respondent's personal identifying information.

Such alternative relief would substantially reduce the ongoing risk of harm while preserving public access to the substantive issues presented in this proceeding.

K. Narrow redaction is the least restrictive remedy.

Respondent does not seek to seal the proceeding or suppress the substantive disciplinary record. She seeks only redaction of her residential address, personal contact information, and other personal identifying information from public-facing materials.

That remedy is narrow, practical, and sufficient. It preserves public access to the case while preventing continued disclosure of information that has already caused harassment and safety concerns.

V. CONCLUSION

For the foregoing reasons, Respondent respectfully requests that the Board grant reconsideration and order redaction of Respondent's residential address, personal contact information, and other personal identifying information from public-facing Board materials, with any necessary redacted replacements filed or posted in place of the unredacted versions.

Respectfully submitted,

THELMA M. ANDERSON
RESPONDENT, PRO SE

PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully prays that the Board of Disciplinary Appeals:

1. grant this Motion for Reconsideration;
2. order redaction of Respondent's residential address, personal contact information, and other personal identifying information from public-facing Board materials; and
3. replace any public version of records, pleadings, exhibits, transcripts, recordings, or orders containing such information with redacted versions.

Respondent prays for no further relief.

Respectfully submitted,

THELMA M. ANDERSON
RESPONDENT, PRO SE

BODA CAUSE NO. 71154
EXHIBIT BINDER



Thelma Anderson <thelma.anderson10@gmail.com>

CAUSE NO. 71154 Request for Redaction / Removal of Personal Identifying Information from Public Record

2 messages

Thelma Anderson <thelma.anderson10@gmail.com>
To: CDCInfo <cdcinfo@texasbar.com>

Mon, Mar 16, 2026 at 2:44 PM

Good Afternoon

I am writing because **Jenny Hodgkins, an attorney with the Texas Board of Disciplinary Appeals**, stated that I will need to confer with the Commission for Lawyer Discipline regarding **redaction, sealing, removal from the website, or other measures related to privacy or security concerns associated with this proceeding.**

Accordingly, I am contacting your office to address the **public dissemination of my personal identifying information, including my home address**, which appears in materials associated with this matter and within the publicly posted hearing video.

The circulation of this information has created a **serious and ongoing safety risk.**

Since the hearing video and related materials were made publicly available, my home address has circulated online and across multiple platforms. I have experienced harassment, threatening communications, repeated calls from unidentified numbers, and individuals appearing at my residence. I have also been required to file police reports and submit complaints due to the ongoing harassment and stalking behavior associated with the dissemination of this information.

Additionally, attorneys have utilized publicly available materials from this proceeding in a manner that has contributed to the continued harassment and dissemination of this information.

On March 6, 2026, Laquita Long, Texas Bar No. 24044340, a Trial Bureau Chief with the Dallas County District Attorney's Office and Respondent's former employer, published social media graphics and a link directing viewers to the publicly posted hearing recording.

Dallas County District Attorney's Office
133 North Riverfront Boulevard
Dallas, Texas 75207

Government Email: laquita.long@dallascounty.org
Government Phone: (214) 653-3600

The social media content directed viewers to the hearing recording containing Respondent's private protected information, amplifying the dissemination of Respondent's private identifying information.

Respondent filed a police report regarding harassment and cyberstalking associated with these events: **Police Report No. T26000430**

Beginning on March 7, 2026 and continuing through March 10, 2026, Charles Adams,

Texas Bar No. 24026760, owner of Big Angry Law, located at:

**4048 Vista Road, Suite 200A
Pasadena, Texas 77504
Phone: 713-589-1500**

initiated additional online attacks referencing this matter and further directing attention to the hearing recording.

Respondent filed an additional police report regarding these events: **Police Report No. T26000426** following the dissemination of Respondent's residential address, Respondent has received harassing communications and individuals appearing at Respondent's residence, demonstrating that the continued publication of Respondent's home address presents a real and ongoing safety risk.

Because of these circumstances, I am requesting that the Commission for Lawyer Discipline confer regarding **immediate corrective measures**, including but not limited to:

- removal of personal identifying information appearing in the record
- removal of publicly posted video containing such information from February 12, 2026
- redaction of exhibits containing my residential address
- any other measures available to prevent further dissemination of private information that creates a safety risk

Texas law recognizes that public access to records may be limited when necessary to protect privacy and safety interests.

Under **Texas Rule of Civil Procedure 76a**, public access to court records may be restricted when a **specific, serious, and substantial interest clearly outweighs the presumption of openness**.

Similarly, **Texas Rule of Judicial Administration 12** recognizes that access to judicial records may be limited when necessary to protect **privacy interests and security concerns**.

Texas statutory law also recognizes the need to protect residential address information from unnecessary public dissemination. Under **Texas Government Code §552.101** and **Texas Government Code §552.117**, the law acknowledges that disclosure of an individual's home address may expose the individual to **harassment, stalking, or threats to personal safety**.

Given the safety concerns that have arisen from the public dissemination of this information, I respectfully request that your office review the materials associated with this proceeding and advise what steps can be taken to **redact or remove my residential address and other personal identifying information from publicly accessible records and video**.

This request is made in good faith to prevent further harm and to ensure that sensitive personal information is not unnecessarily circulated where it has already resulted in harassment and safety concerns.

Please let me know how your office wishes to proceed.

Respectfully,

Thelma M. Anderson

 **Safety Risk, Unauthorized Disclosure of Personal Information, and Request for Confidential Filing Procedure (Cause No. 71154).pdf**
208K

Ramiro Canales <Ramiro.Canales@texasbar.com>

Mon, Mar 16, 2026 at 5:35 PM

To: Thelma Anderson <thelma.anderson10@gmail.com>

Cc: CDCInfo <CDCInfo@texasbar.com>, Royce LeMoine <Royce.LeMoine@texasbar.com>

Ms. Anderson,

Your email was forwarded to me.

If you are contemplating filing a motion to redact your home address from the pleadings on file with the Board of Disciplinary Appeals, our client is unopposed.

Sincerely,

Ramiro Canales

Trial Attorney

Office of the Chief Disciplinary Counsel

State Bar of Texas

P.O. Box 12487

Austin, Texas 78711-2487

Phone: 512.427.1328

Fax: 512.427.4253



STATE BAR of TEXAS

CONFIDENTIALITY NOTICE:

This electronic message and any attachments is intended for the lawful use by the individual or entity to whom or which it is addressed. It may contain information that is confidential, privileged, and not subject to disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any copying, dissemination, or distribution of this message, responses, replies, and attachments is strictly prohibited. If you have received this message in error, please notify me by e-mail and destroy the original message.

[Quoted text hidden]


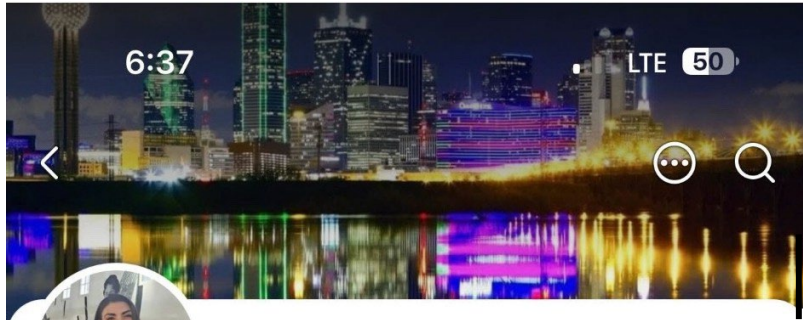
 **Safety Risk, Unauthorized Disclosure of Personal Information, and Request for Confidential Filing Procedure (Cause No. 71154).pdf**
208K

Exhibit E

Christina Aguayo Facebook Profile



Christina Aguayo **e**

1.5K friends • 10K posts

0 Message

All Photos Reels

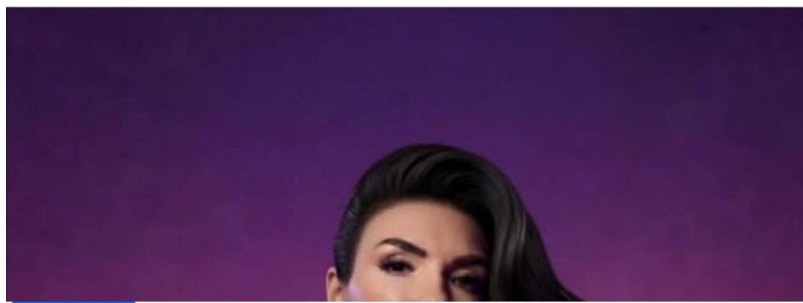
Highlights



All posts

Christina Aguayo \$

May 31 • 0



Home



Reels



Friends



Marketplace



Notifications



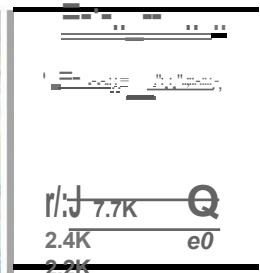
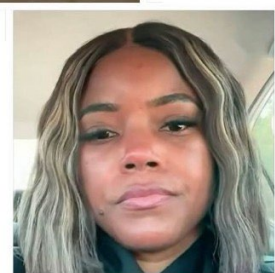
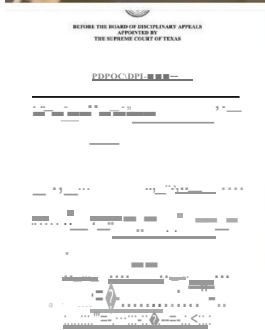
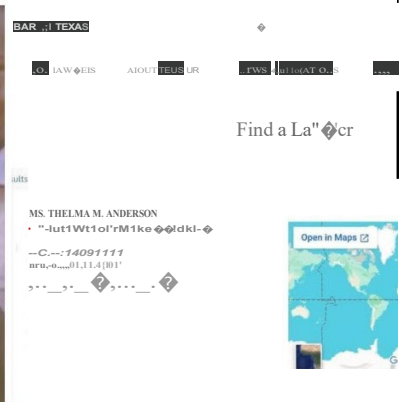
Profile

Exhibit F

Christina Aguayo Publication of BODA Materials

The removal cited misconduct and conduct discrediting the position under the city charter, directly tied to the federal indictment.

#ChristinaAguayoNews





10. **4**
 Misrepresentation, failure to provide information, non-compliance with the
 Regulations violated that of **Section 4** of the **Normal Standards of Practice for
 Certified Valuators**. **Section 4** states that she signed the CVR



Exhibit G

Publication of BODA Order



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

INTERLOCUTORY ORDER OF SUSPENSION

On the 12th and 26th days of February, 2026, the above-styled and numbered compulsory disciplinary action was called for hearing before a three-member panel of the Board of Disciplinary Appeals. See TEX. RULES DISCIPLINARY P. R. 7.05; BODA INTERNAL PROCEDURAL RULE 1.04(a).

On February 12, 2026, the Commission for Lawyer Discipline, Petitioner, appeared by attorney and Thelma M. Anderson, Respondent, appeared pro se. On February 26, 2026, Petitioner appeared by attorney but Respondent, having been duly notified of the hearing, did not appear. All questions of fact and all issues of law were submitted to the Board of Disciplinary Appeals for determination. Having considered the pleadings on file, having received evidence, and having heard the argument of counsel, the Board of Disciplinary Appeals makes the following findings, conclusions, and orders:

Finding of Fact. The Board of Disciplinary Appeals finds that:

- (1) Respondent, Thelma M. Anderson, State Bar Card number 24091728, is licensed and authorized by the Supreme Court of Texas to practice law in the State of Texas.
- (2) On March 5, 2025, a Judgment in a Criminal Case was entered in Cause No. 3:24-CR-00191-K(1), styled *United States of America v. Thelma Marshall Anderson*, in the United States District Court for the Northern District of Texas, Dallas Division, wherein Respondent pleaded guilty to Count I of the three-count indictment, filed on May 21, 2024, and was thereafter

Thelma M. Anderson
Attorney at Law
P.O. Box 109

Exhibit H

Harassing Email from Franklin Erickson

3:48PM

Franklin Erickson



To You

...

Q



Screen Shot..

PNG - 33 KB



Screen Shot..

PNG - 29 KB

f) 2 attachments (62 KB)

[Save attachments](#)

Hey Thelma, why on earth would anyone hire a bigmouth idiot like you? Number one, you have zero clue about the law, obviously. Number two, you are a racist. Number 3, you are nothing more than a loud mouth stupid dumb cunt who is going to go through life as a race hustler. Go FUCK yourself Thelma. I hope you lose your license to practice law for good. We don't need anymore assholes like you. Get a clue you hateful piece of shit.

Sincerely,

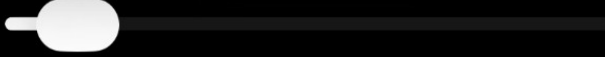
Franklin






Exhibit I

Threatening Voicemail Transcript

Unknown - J... 6 at 4:54 PM

withheld ›

00:04  -00:57

[Add Contact](#) [Report Spam](#)

Transcript (low confidence)

Thelma, Thelma. You want to talk about lynching sweetheart. We're coming for you, nigger bitch. We will lynch you for real. Your neck will break, and we will burn you alive. So you wanna talk about lynchings, you fucking cunt? That's what's going to happen, you and all your people, all your nigger people that look like you because whites are done, Carmel Anthony is going to be raped in prison every fucking day by the Aryan brotherhood, every hour of every fucking day. Your little nigger boy. Committed murder on a white. We all know it and we're done. So yeah, talk about lynching sweetheart. We're coming for you, you fucking whore, you and all your little nigger friends, you don't belong here, and we're gonna make it known. Bye sweetheart.

Exhibit J

Anonymous Caller Screenshot

a Voicemail
No Caller ID

iPhone is asking for more information.

Hi, if you record your name
and reason for calling, I'll see if
this person is available.

No Caller ID
Outrageous?

Thanks. Please stay on
the line.

(Type to Reply)



Exhibit K

Repeated Calls From Unknown Numbers

Unknown - J... 6 at 4:54 PM

withheld ›

00:04 ————— -00:57

📤 ⏮ ⏸ 🔊 🗑

[Add Contact](#) [Report Spam](#)


Transcript (low confidence)

Thelma, Thelma. You want to talk about lynching sweetheart. We're coming for you, nigger bitch. We will lynch you for real. Your neck will break, and we will burn you alive. So you wanna talk about lynchings, you fucking cunt? That's what's going to happen, you and all your people, all your nigger people that look like you because whites are done, Carmel Anthony is going to be raped in prison every fucking day by the Aryan brotherhood, every hour of every fucking day. Your little nigger boy. Committed murder on a white. We all know it and we're done. So yeah, talk about lynching sweetheart. We're coming for you, you fucking whore, you and all your little nigger friends, you don't belong here, and we're gonna make it known. Bye sweetheart.

Exhibit L




Additional Voicemail Evidence

 Search

 **+1 (813) 997-8443** 7:40 PM 
📞   Land O Lakes, FL

 **+1 (813) 997-8443** 7:40 PM 
📞   Land O Lakes, FL

 **+1 (813) 997-8443** 7:37 PM 
📞   PAUL PADUANO

 **No Caller ID** 7:10 PM 
📞  unknown




 **No Caller ID** 7:09 PM 
📞  unknown

Exhibit M

Additional Harassing Email Evidence

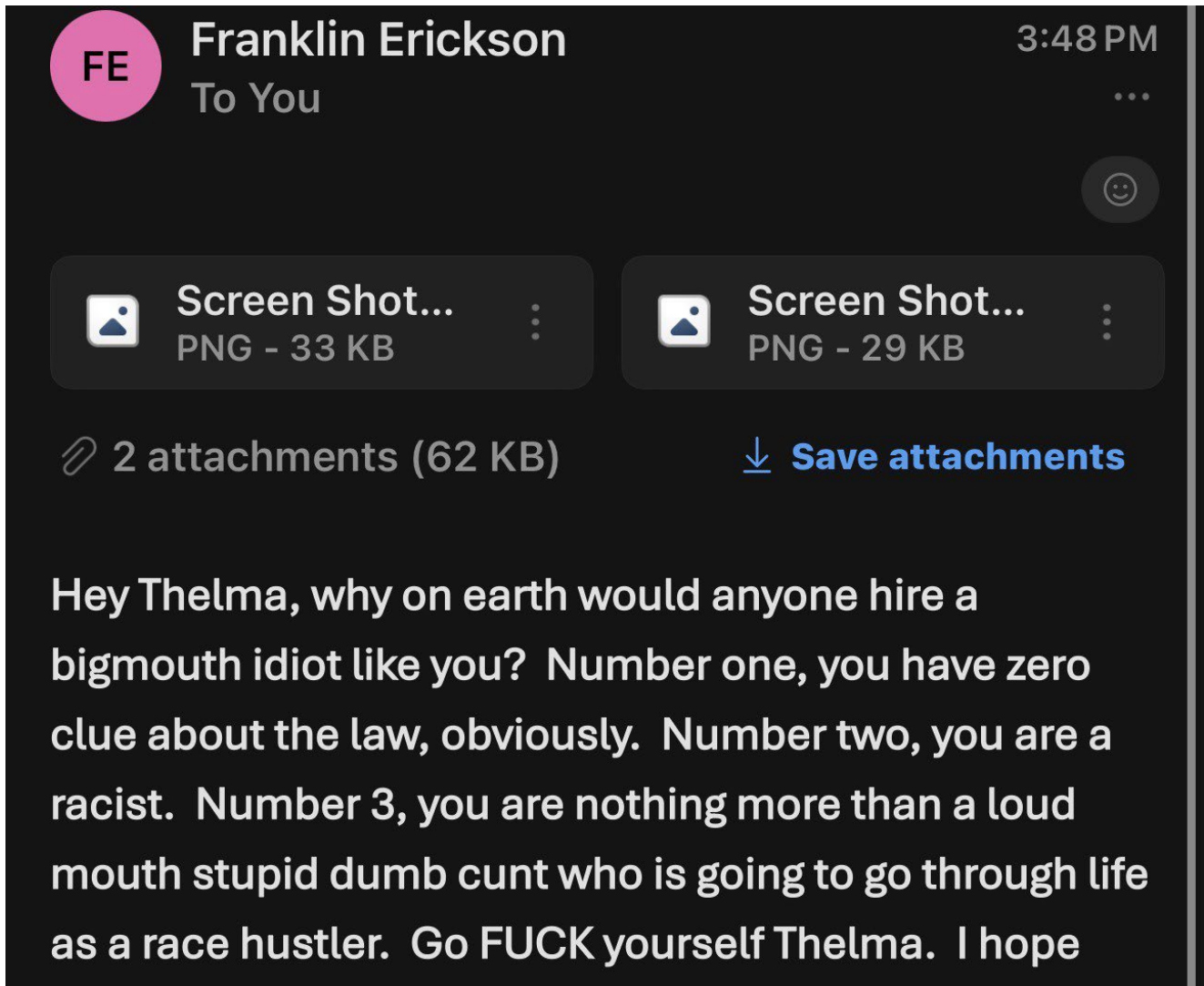


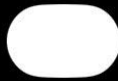
Exhibit N

Call Transcript Referencing Respondent

+1 (813) 997-8443 ›

Unknown - Jun 10, 2026 at 7:41 PM

00:00



-00:20



 **Add Contact**

 **Report Spam**

Transcript

Michael. Excuse me? Are you the disbarred lawyer?