



## Response Regarding Scheduled Disciplinary Proceeding

To the State Bar of Texas Disciplinary Counsel,

I am submitting this response regarding the scheduled disciplinary proceeding. After reviewing the notice and materials provided, it is evident that the file before the Board is incomplete and omits material facts. Most critically, it fails to reflect that my underlying criminal matter is currently under appeal before the Texas Court of Criminal Appeals. Because a conviction is not final while an appeal is pending, any action at this time is premature and would violate my right to due process.

**SERVED: THERE IS AN ALLEGED NOTICE THAT I WAS SERVED. I WAS NEVER SERVED ANY DOCUMENTS. ANY CLAIM OF SERVICE IS INVALID AND INACCURATE.**

### **Status of Appeal**

My appeal raises substantial constitutional claims, including prosecutorial misconduct, ineffective assistance of counsel, and conflicts of interest. These issues are central to the validity of the underlying case and are directly tied to the allegations now being used as the basis for disciplinary proceedings. Until appellate review is complete, the matter remains unresolved in law.

### **Prosecutorial Misconduct by Paul Hamilton**

The foundation of the criminal allegations stems from misconduct by Paul Hamilton, First Assistant District Attorney for Dallas County. Hamilton knowingly gave false testimony to federal agents and before the grand jury in retaliation after losing an unemployment benefits hearing. This perjury and abuse of authority were not only retaliatory but also a violation of state law, federal law, and the Texas Disciplinary Rules of Professional Conduct.

Hamilton misrepresented both his position and the applicable DA's Office policies. He claimed I was prohibited and unauthorized to operate my business, despite his own written memo explicitly permitting me to continue operations subject only to disclaimers. Not to mention 2019 this individual was not the first assistant nor in a supervisory role over me to have authority and prohibit the outside employment he intentionally lied about, and it has been heavily documented in his own words. This individual also confirmed I was authorized and allowed to operate Thelma Lou the company he lied to the federal government about when his target was Tell A Lawyer. Not only did he target me but another black prosecutor that is in writing because we were the first two prosecutors to ever win a unemployment hearing claim due to his wrongful termination. His conduct violated Rule 3.03 (Candor Toward the Tribunal), Rule 3.04 (Fairness in Adjudicatory Proceedings), and Rule 8.04 (Misconduct), undermining the integrity of the judicial process. The Texas Rangers are currently investigating Mr. Hamilton to determine if criminal charges will be referred to the state or federal.

### **Ineffective Assistance of Counsel**

My defense counsel compounded these injustices by failing to obtain Brady material despite over 7 request that were emailed, withholding discovery the knew were a result of my former employer committing perjury the same employer I communicated if he had something to do with this we need to challenge the case where I was told no, and coercing me into a plea without adequate explanation or review. A grievance against my attorney is currently pending before the State Bar and has entered the second stage of review with a malpractice lawsuit pending to file. This misconduct deprived me of effective assistance of counsel and further supports the basis for my ongoing appeal.

### **Incomplete Investigation by the State Bar**

It is concerning that these disciplinary proceedings were scheduled without the Board first confirming the status of my appeal. Not only was it not confirmed it is available and was available for retrieval. The omission of this critical fact demonstrates that the investigation and file preparation were incomplete. Proceeding under such circumstances risks an outcome based on inaccurate and misleading information.

### **Request for Abatement**

Because my conviction is not final and remains under appeal, and because the underlying allegations stem from misconduct committed by Paul Hamilton and further compounded by ineffective assistance of counsel, I respectfully request that the disciplinary proceedings be abated or stayed until the appeal is resolved. Proceeding at this time would be premature, unjust, and in violation of due process protections.

Please confirm that these proceedings will be held in abeyance pending the final outcome of my appeal. I also have not been served per the email that was sent.

Respectfully submitted,

Thelma Anderson  
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