

CAUSE NO. _____

DANIEL WONG,

Plaintiff,

v.

BRIDGETTE SMITH-LAWSON, Fort Bend
County Attorney,

Defendant.

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IN THE DISTRICT COURT

_____ JUDICIAL DISTRICT

FORT BEND COUNTY, TEXAS

PLAINTIFF’S ORIGINAL PETITION

1. A district court lawfully appointed Daniel Wong to serve as County Judge of Fort Bend County pursuant to Chapter 87 of the Texas Local Government Code. That appointment remains. No judicial order has declared the appointment terminated. No court has declared the office vacant. No successor has been appointed or qualified.

2. Nevertheless, Fort Bend County Attorney Bridgette Smith-Lawson, whose sole responsibility is to provide legal advice to the County, unilaterally declared that Judge Wong was out of office. Acting solely upon her own opinion of the law, she directed county officials to terminate Judge Wong’s access to county facilities, remove his access to county systems, and treat the office of County Judge as though it is vacant. She further advised members of Commissioners Court that any meeting over which Judge Wong presided could be challenged as unlawful.

3. Those actions created precisely the uncertainty and disruption that the Texas Constitution was designed to prevent. A Commissioners Court meeting was thrown into controversy. County employees were placed in the impossible position of choosing between obeying a standing district court order and complying with directives that purported to disregard

it. Public resources that should have been devoted to public safety, emergency preparedness, transportation, budgeting, and the daily work of county government instead became consumed by a manufactured dispute over who possessed lawful authority to lead the County.

4. Judge Wong did not create this controversy. He did exactly what the district court ordered him to do. He accepted the appointment lawfully conferred upon him, took the required oath of office, and has continued to perform the duties of County Judge in accordance with both the district court's appointment order and the Texas Constitution. But because the County Attorney has asserted authority she does not possess and attempted to interfere with the lawful operation of county government, Judge Wong is faced with only one appropriate course of action: return to the judiciary whose order is at issue and ask it to declare what the law requires.

5. Accordingly, Plaintiff seeks declarations confirming that the district court's appointment remains legally effective, that the Texas Constitution independently requires the continuity of lawful government until a successor is duly qualified, and that the County Attorney acted without legal authority in attempting to terminate Judge Wong's service in office and interfere with the orderly operation of Fort Bend County government.

6. The people of Fort Bend County deserve a government that is governed by law, not by politics. This lawsuit asks the Court to reaffirm that principle, restore certainty to the operation of county government, and ensure that the people's business continues under the rule of law.

PARTIES

7. Plaintiff Daniel Wong, the County Judge of Fort Bend County, is an individual residing in Fort Bend County, Texas.

8. Defendant Bridgette Smith-Lawson is the County Attorney of Fort Bend County, Texas. She may be served at her office at the Fort Bend County Attorney's Office, 401 Jackson

Street, 3rd Floor, Fort Bend County, Texas, 77469, or wherever she may be found. Smith-Lawson is sued in her official capacity.

JURISDICTION AND VENUE

9. This Court has jurisdiction over this lawsuit because the amount in controversy is within the jurisdiction of this Court or because the relief sought is equitable relief. Tex. Const. art. V, § 8; Tex. Gov't Code §§ 24.007 and 24.008; Tex. Civ. Prac. & Rem. Code § 65.021(a).

10. This Court is the proper venue to hear this lawsuit pursuant to Tex. Civ. Prac. & Rem. Code § 15.002(a)(1) and (3) because the events giving rise to this lawsuit occurred in Fort Bend County, Texas, and Fort Bend County is the county of the Defendant's principal office in this State.

WAIVER OF GOVERNMENTAL IMMUNITY

11. Governmental immunity does not preclude prospective injunctive remedies in official-capacity suits against government actors who "violate statutory authority or constitutional provisions." *City of El Paso v. Heinrich*, 284 S.W.3d 366, 369 (Tex. 2009).

12. "For claims challenging the validity of ordinances or statutes . . . , the Declaratory Judgment Act requires that the relevant governmental entities be made parties, and thereby waives immunity." *Id.* at 373 n.6.

13. Moreover, "claims brought under the UDJA for declaratory or injunctive relief against actions taken by a governmental official beyond his discretion or without legal authority," do not implicate governmental immunity. *Collier v. Suhre*, 605 S.W.3d 699, 704 (Tex. App.—Hous. [1st Dist.] 2020, no pet.).

14. Wong may thus “seek declaratory relief against state officials who allegedly act without legal or statutory authority.” *Tex. Natural Res. Conservation Comm’n v. IT–Davy*, 74 S.W.3d 849, 855 (Tex. 2002).

CONDITIONS PRECEDENT

15. All conditions precedent have been met, have occurred, or have been waived.

DISCOVERY AND RULE 47(C) STATEMENT

16. Plaintiff requests that this case proceed under Discovery Level 2 pursuant to Texas Rule of Civil Procedure 190.3. Plaintiff seeks non-monetary relief.

RULE 193.7 NOTICE

17. Plaintiff gives notice to Defendant that he intends to use all documents exchanged and produced between the parties during the trial in this matter.

BACKGROUND

18. Partisan political opponents of County Judge Daniel Wong have launched a meritless and legally unsupported public campaign against his lawful status as the chief executive of Fort Bend County. Wong—a Republican—faces an ongoing and imminent threat of ouster by the County Attorney and her confederates—all Democrats.

19. These threats culminated most recently at a June 25, 2026, Commissioners Court meeting, in which Commissioners Grady Prestage and Dexter McCoy, apparently relying on legal advice from Smith-Lawson, contended that Wong was no longer an officer of the county because of a private plaintiff’s unilateral decision to nonsuit her case in *Roberts v. George*, No. 25-DCV-335003 (400th Dist. Ct., Fort Bend County, Texas).

20. Smith-Lawson took the position that Judge Wong could not continue his duties without an additional court order regarding his appointment and that any actions taken by the

Commissioners Court with Wong presiding *could* constitute a violation of the Texas Open Meetings Act (TOMA) subject to challenge by any interested person—ignoring, of course, that wrongfully excluding Wong most certainly *would* constitute a TOMA violation.

21. Prestage and McCoy moved to exclude Wong from participating in the meeting and proceeding with the Commissioners Court agenda in his absence. Once the vote failed, Prestage and McCoy departed in protest of what they described as an “illegal meeting.”

22. Accordingly, to ensure that the business of Fort Bend County is not disrupted by Democrats’ unlawful partisan actions, Judge Wong has no choice but to file this lawsuit to stop the ongoing threats to the orderly administration of County Commissioners Court business and make clear what should be obvious: Daniel Wong is the County Judge of Fort Bend County.

FORT BEND COUNTY COMMISSIONERS COURT

23. The Fort Bend County Commissioners Court serves as the statutorily authorized policymaking and administrative branch of county government. *See* Tex. Loc. Gov’t Code ch. 81.

24. The Fort Bend County Commissioners Court consists of five voting members: the County Judge as presiding officer and four County Commissioners. *Id.* § 81.001(a)-(b).

25. Generally, three members of the Commissioners Court constitute a quorum. *Id.* § 81.006(a). Actions generally require a majority vote of those legally authorized to vote unless a statute requires otherwise. Each Commissioner has one vote; the County Judge votes as a full member. *Id.* §§ 81.001(a); 81.006(a).

26. Fort Bend County has adopted formal Rules of Procedure, Conduct and Decorum, which expressly require that all meetings comply with the Texas Open Meetings Act, Tex. Gov't Code ch. 551.¹

27. Fort Bend County's rules provide for regularly scheduled meetings established by the Court. The controlling schedule is reflected in the officially posted meeting notices and calendar.²

JUDGE WONG'S APPOINTMENT

28. Former County Judge KP George was recently removed from office as a result of his criminal conviction. **Ex. A.**

29. Prior to the criminal judgment against him, Democrat partisan Sarah Roberts filed a Chapter 87 civil removal action in a case captioned *Roberts v. George*, Cause No. 25-DCV-335003 (400th Dist. Ct., Fort Bend County, Texas).

30. On April 10, 2026, Judge Jeth Jones, presiding by special appointment over the District Court for the 400th Judicial District, entered an order suspending George and appointing Daniel Wong as County Judge to perform the duties of the office under Texas Local Government Code § 87.017. **Ex. B.**

31. The appointment order itself is open ended and is not limited by time or made contingent on the happening of any event. *Id.* It simply provides that the court "hereby appoints Daniel Wong as County Judge to perform the duties of the office." *Id.*

¹ Fort Bend County, Rules and Procedures of Commissioners Court (last visited June 25, 2026), <https://www.fortbendcountytexas.gov/government/departments/commissioners-court/rules-and-procedures-of-commissioners-court>.

² Fort Bend County Commissioners Court, Regular Meeting Schedule FY 2026 (last visited June 25, 2026), <https://www.fortbendcountytexas.gov/sites/default/files/document-central/document-central/commr-court-documents/Commissioners-Court-Schedule-1.pdf>.

32. On June 17, 2026, Roberts—a Democrat partisan—submitted a notice of nonsuit in Cause No. 25-DCV-335003. **Ex. C.**

33. The civil case was immediately terminated upon the filing of the notice of nonsuit by the plaintiff. *See* Tex. R. Civ. P. 162. Later that same day, Judge Jones entered an order granting the nonsuit with prejudice and disposing of the matter. **Ex. D.** Though the order’s legal effect as anything other than a purely ministerial act is dubious—the Rules of Civil Procedure make clear that a case is disposed upon filing of the nonsuit, which would typically leave nothing for the district court to do—that order regarding the nonsuit said nothing about undoing Judge Wong’s appointment. *See id.*; *see also Kelsall v. Haisten*, 564 S.W.3d 157, 162 (Tex. App.—Houston [1st Dist.] 2018, no pet.) (“A plaintiff’s nonsuit is effective immediately upon filing.”).

SMITH-LAWSON’S UNLAWFUL ATTEMPT TO REMOVE JUDGE WONG

34. A regularly scheduled meeting of the Fort Bend County Commissioners Court was noticed for June 25, 2026. The agenda for the June 25 meeting was posted on the Fort Bend County website.³ Judge Wong signed and issued the agenda for this meeting. *Id.*

35. On June 24, 2026, Smith-Lawson emailed various Fort Bend County department heads concerning Judge Wong. **Ex. E.** She instructed them that Wong “no longer holds the legal authority to act as County Judge and is not an employee of Fort Bend County,” and directed department leaders to terminate Wong’s employment, revoke his badge access, shut down his access to County computer systems. *Id.*

36. The County Attorney sent the memorandum by email on June 24, 2026, to several County personnel and County Commissioners, yet deliberately excluded Wong. **Ex. F.**

³ Fort Bend County Commissioners Court, Notice of Meeting (last visited June 25, 2026), https://agendalink.fortbendcountytexas.gov/agenda_publish.cfm?id=0&mt=ALL&get_month=6&get_year=2026&dsp=ag&seq=4103.

37. Also on June 24, 2026, McCoy issued a press release urging Wong to “follow the law and immediately vacate [his] position as Interim County Judge.” **Ex. G.** Later that day, Prestage called Wong and attempted to threaten and intimidate him into staying away from Commissioner’s Court so that Prestage could himself preside over the body.

38. The morning of the June 25 meeting, Wong, through counsel, issued a letter responding to Smith-Lawson’s memo. **Ex. H.** The letter explained that the order appointing Judge Wong remains in effect by its own terms and that Smith-Lawson’s conclusion regarding Judge Wong’s status was wrong. *Id.* Moreover, the plain text of Texas Local Government Code § 87.017 does not contemplate the dismissal of the underlying suit following an officer’s removal as a result of a criminal conviction, so the Local Government Code provides for no mechanism to limit or terminate Judge Wong’s appointment as County Judge under the circumstances. *Id.* Finally, article XVI, § 17 of the Texas Constitution—the “holdover” provision—requires Judge Wong to continue as Fort Bend County Judge until his successor takes office because “all officers of this State shall continue to perform the duties of their offices until their successors shall be duly qualified.” *Id.* Contrary to Smith-Lawson’s conclusion, “this is not optional for Judge Wong: the Texas Constitution requires him to continue to serve the people of Fort Bend County.” *Id.*

39. Later that same morning, before the meeting, Smith-Lawson responded to Wong’s letter, abiding by her prior legal interpretation and arguing—without supporting authority—that the holdover provisions of the Texas Constitution are inapplicable. **Ex. I.** Smith-Lawson further threatened that Wong lacked “clear authority to participate in conducting the business of the county” and that doing so would subject Commissioners Court business to challenge under TOMA. *Id.*

40. Wong took his usual seat presiding over the Court and gaveled the meeting open, but Prestage and McCoy attempted to exclude Wong from participating. Upon request of McCoy, Smith-Lawson read her legal opinion regarding Wong's appointment on the record, stated that Wong was not the officeholder without a new court order to that effect, and warned that any interested person could challenge business conducted while Wong presided under TOMA.

41. Prestage moved to proceed without Wong. The motion failed.

42. Prestage and McCoy then walked out of the Commissioners Court meeting, with Prestage protesting that he would not participate in an "illegal meeting." County Judge Wong proceeded with the meeting agenda with a quorum present.

43. When it came time to enter into executive session, Smith-Lawson refused. She claimed that she could not provide legal advice to Wong and that Wong's status jeopardized the applicability of attorney-client privilege during that executive session.

44. Wong clarified with Smith-Lawson, and Smith-Lawson confirmed, that she was refusing to obey the request of the Commissioners Court—her client the lawful authority of Fort Bend County—to provide it legal advice in a closed session, as she is obligated to do.

CAUSES OF ACTION

COUNT I

UDJA (Civil Practice & Remedies Code § 37.004(a)) Declaration that The Order appointing Judge Wong Remains in Effect

45. Plaintiff re-alleges and incorporate by reference the above allegations.

46. Under Texas Civil Practice and Remedies Code § 37.004(a), "a person whose rights are affected by a statute may have determined any question of validity arising under the statute and obtain a declaration of rights or other legal relations thereunder." (cleaned up).

47. The plain text of Texas Local Government Code § 87.017 does not contemplate the dismissal of the underlying suit in which suspension and appointment of a replacement County Judge is ordered. It merely states that the district judge “may temporarily suspend the officer and appoint another person to perform the duties of the office.” *Id.* § 87.017(a).

48. Normally, the status of the office is resolved following trial. *See id.* However, the Local Government Code has no provision explaining what happens if the defendant officer is removed by other means while the civil case is pending. Thus, the text of the order must control. Here, the order is clear and unconditional, and Wong’s appointment was not affected by the disposition of *Roberts v. George*.

49. The right to hold office is protected by Article I, Section 19 of the Texas Constitution, *Runyon v. George*, 349 S.W.2d 107, 109 (Tex. App.—Eastland 1961, writ dismissed), and “as such can be enforced in the courts,” *Gaines v. Farmer*, 55 Tex. Civ. App. 601, 607, 119 S.W. 874, 878 (1909, writ dismissed).

50. Wong is entitled to a declaratory judgment to establish that: (1) his interim appointment remains valid despite the Order of Nonsuit in the underlying litigation (Cause No. 25-DCV-335003), and (2) the legal basis for Smith-Lawson’s opinion that his appointment terminated under Texas Local Government Code § 87.017 is invalid.

COUNT II

UDJA (Civil Practice & Remedies Code § 37.004(a)) Declaration that Judge Wong Must Continue to Serve Under Tex. Const. art. XVI, § 17

51. Plaintiff re-alleges and incorporates by reference the above allegations.

52. Article XVI, § 17 provides that “all officers of this State shall continue to perform the duties of their offices until their successors shall be duly qualified.” Tex. Const. art. XVI, § 17. As explained in the 2018 editor’s notes of the provision, this is “to prevent public convenience

from suffering because of a vacancy in office, and to insure against vacancies in office.” Tex. Const. art. XVI, § 17 interp. commentary (West 2018).

53. This is exactly the situation faced here. KP George cannot resume the office of County Judge. Even if Judge Wong’s appointment was extinguished by the dismissal of the underlying case—it was not—George’s inability to resume office means that Judge Wong may not stop performing the duties of the office under Tex. Const. art. XVI, § 17 until a successor is duly qualified.

54. Courts across Texas have applied section 17 as such. *In re Reed*, No. 02-22-00113-CV, 2022 WL 1405520, at *8 (Tex. App.—Fort Worth May 4, 2022, no pet.) (invoking article XVI, section 17 to keep an incumbent in office as a holdover pending a special election to fill the resulting vacancy); *Bianchi v. State*, 444 S.W.3d 231, 248–49 (Tex. App.—Corpus Christi–Edinburg 2014, no pet.) (applying article XVI, section 17 to keep a constructively resigned officer in office as a lawful holdover until his successor qualifies); *Crawford v. State*, 153 S.W.3d 497, 504–05 (Tex. App.—Amarillo 2004, no pet.) (applying article XVI, section 17 to hold a resignation ineffective to vacate office absent a qualified successor); *Pyote Indep. Sch. Dist. v. Estes*, 390 S.W.2d 3, 7 (Tex. App.—El Paso 1965, writ ref’d n.r.e.) (recognizing under article XVI, section 17 that unreelected school trustees continue to hold office until their successors qualify, keeping the board functional).

55. Moreover, courts have recognized that the holdover provision applies to county judges for well over 100 years. *See, e.g., State v. Jordan*, 28 S.W.2d 921 (Tex. App.—Amarillo 1930, writ dism’d w.o.j.); *McGhee v. Dickey*, 4 Tex. Civ. App. 104, 23 S.W. 404 (1893, no writ).

56. Multiple Attorney General Opinions confirm that the holdover provision of Tex. Const. art. XVI, § 17 must be interpreted consistently with Chapter 87 “in order to preserve the

orderly process of government.” Tex. Att’y Gen. Op. GA-0263 (Oct. 26, 2004) (citing *Ex parte Sanders*, 215 S.W.2d 325 (Tex. 1948); Tex. Att’y Gen. Op. No. M-742 (1970); Tex. Att’y Gen. Op. No. MW-521 (1982); Tex. Att’y Gen. Op. No. JM-579 (1986)).

57. Simply put, the Texas Constitution directs Wong to continue serving unless and until a successor is duly qualified. That condition has not occurred. Because no successor has been duly qualified, the Court should declare that Wong must continue serving as County Judge under Article XVI, § 17.

COUNT III

Ultra Vires Actions

Smith-Lawson Acted Unlawfully in Purporting to Terminate Judge Wong

58. Plaintiff re-alleges and incorporates by reference the above allegations.

59. In an *ultra vires* case, a plaintiff must allege, and ultimately prove, that an officer acted without legal authority or failed to perform a purely ministerial act. *Heinrich*, 284 S.W.3d at 372. *Ultra vires* claims lie against government officials in their official capacities. *See Hall v. McRaven*, 508 S.W.3d 232, 240 (Tex. 2017) (stating that “an ultra vires suit must lie against the allegedly responsible government actor in his official capacity”).

60. As an elected county official, Defendant “possess[es] only such powers as are expressly conferred upon [her] by law or are necessarily implied from the powers so conferred.” Tex. Att’y Gen. Op. No. KP-0504 (2025) at 2 (quoting Tex. Att’y Gen. Op. No. GA-0709 (2009) at 2).

61. Each elected county official maintains a protected “sphere” of authority that “consists of the officer’s core duties under the Texas Constitution and statutes”—those duties “exclusively assigned by state law to a particular officer.” *Id.* at 2 (quoting *Harris County v. Coats*, 607 S.W.3d 359, 377 (Tex. App.—Hous. [14th Dist.] 2020, no pet.).

62. The Constitution and statutes accordingly contemplate that as between the Commissioners Court and the other elected county officials, “each must be able to exercise its respective powers without the other improperly interfering.” *Id.* at 2.

63. Administrative and executive authority over county affairs rests with the Commissioners Court as the county’s “principal governing body” and “administrative head of county government,” not with the County Attorney. *Id.* at 2–3.

64. The County Attorney’s own authority is representational and bounded: her “primary duty” is to represent the county and its officials “in all civil matters pending before the courts,” and her exclusive authority under Section 45.179(a) reaches no further than such matters. *Id.* at 4; Tex. Gov’t Code § 45.179(a).

65. The office of County Judge is a constitutional county office with its own core duties, and the County Judge sits as a member of the Commissioners Court. *See* Tex. Const. art. V, §§ 15, 18(b).

66. Whether a vacancy exists in the office of County Judge is not a civil matter pending before any court, and no statute confers on the County Attorney the power to declare one. Defendant therefore lacks any legal authority to declare whether such a vacancy exists. That act falls within neither the express nor the implied powers of the County Attorney. *See* Tex. Att’y Gen. Op. No. KP-0504 (2025) at 2, 4.

67. Defendant likewise lacks any legal authority to direct or purport to direct the administrative and executive functions of Fort Bend County, which belong to the Commissioners Court rather than the County Attorney. *Id.* at 2–3.

68. Smith-Lawson's instructions to county employees to terminate or interfere with Wong's office or access to County facilities and resources are executive and administrative acts that exceed her legal authority.

69. Specifically, Smith-Lawson has no authority, statutory or otherwise, to determine vacancies in the Commissioners Court or any other Fort Bend County office, remove elected or appointed officers, countermand a district court order, direct county personnel outside of her office, direct county personnel to disregard judicial appointments, or direct others to exclude Wong from accessing county resources.

70. Those instructions improperly interfere with the office of the County Judge and the Commissioners Court of which he is a member, whose responsibilities "may not be 'frustrate[d]' by other elected county officials." *Id.* at 2. Defendant's assertion of unilateral authority to vacate an elected office and order terminations finds no footing in law.

71. Because Defendant acted without legal authority in purporting to terminate or interfere with the office of County Judge, her actions are ultra vires. *Heinrich*, 284 S.W.3d at 372.

PRAYER

72. Plaintiff asks this Court to enter temporary and permanent injunctive relief to prevent immediate, irreparable harm and to preserve the status quo. Plaintiff further asks this court to provide the following relief:

- a. Enter an order declaring that Judge Wong remains County Judge notwithstanding the disposition of the private civil action *Roberts v. George*, No. 25-DCV-335003 (400th Dist. Ct., Fort Bend County, Texas);
- b. Enter an order declaring that Judge Wong is obligated to continue to serve as County Judge under the holdover provisions of the Texas Constitution;

- c. Enter an order declaring that the County Attorney's actions attempting to terminate Judge Wong's access to county resources was *ultra vires* and setting aside any such unlawful acts;
- d. Enter temporary and permanent injunctive relief preventing the County Attorney from acting inconsistently with the Court's findings and orders under the UDJA, including an order directing Defendant to rescind all directives, memoranda, emails, or instructions inconsistent with the Court's declaration;
- e. Grant such other and further relief, general or special, at law or in equity, to which Plaintiff may be justly entitled.

July 6, 2026

Respectfully submitted.

/s/ Christopher D. Hilton

Judd E. Stone II

Texas Bar No. 24076720

Christopher D. Hilton

Texas Bar No. 24087727

Ari Cuenin

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Counsel for Daniel Wong

EXHIBIT A



CAUSE NO. 25-DCR-110888A

25-DCR-110888A
CONJV 128
Conviction - Not Guilty Plea Jury Verdict
7484818



INCIDENT NO. /TRN: [REDACTED]

THE STATE OF TEXAS

v.

GEORGE, KYLE PRASAD

STATE ID NO.: TX-[REDACTED]

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IN THE 458TH JUDICIAL DISTRICT COURT

of

FORT BEND COUNTY, TEXAS

JUDGMENT OF CONVICTION BY JURY

Judge Presiding:	Jaramillo, Maggie P.	Date Sentence Imposed:	6/16/2026
Attorney for State:	Charann Thompson; Katherine Peterson; Brian Wice	Attorney for Defendant:	Jared Woodfill
<u>Offense for which Defendant Convicted:</u>			
MONEY LAUNDERING >=\$30K<\$150K			
<u>Charging Instrument:</u>		<u>Statute for Offense:</u>	
Indictment		34.02(e)(2)	
<u>Date of Offense:</u>		<u>Plea to Offense:</u>	
04/22/2019		Not Guilty	
<u>Degree of Offense:</u> Third Degree Felony			
<u>Verdict of Jury:</u> Guilty		<u>Findings on Deadly Weapon:</u> N/A	
1 st Enhancement	N/A	Finding on 1 st Enhancement	N/A
Paragraph:		Paragraph:	
2 nd Enhancement	N/A	Finding on 2 nd Enhancement	N/A
Paragraph:		Paragraph:	
<u>Punishment Assessed by:</u>		<u>Date Sentence Commences:</u> (Date does not apply to confinement served as a condition of community supervision.)	
Judge		6/16/2026	

Punishment and Place
of Confinement:

10 YEARS TDCJ-ID

THIS SENTENCE SHALL RUN: Concurrent.

SENTENCE OF CONFINEMENT SUSPENDED, DEFENDANT PLACED ON COMMUNITY SUPERVISION FOR 5
YEARS.

(The document setting forth the conditions of community supervision is incorporated herein by this reference.)

Defendant is required to register as sex offender in accordance with Chapter 62, CCP.

(For sex offender registration purposes only) The age of the victim at the time of the offense was NA.

Fine:

Restitution:

Restitution Payable to: NA

\$ 5000

\$ 0

(See special finding or order of restitution which is incorporated herein by this reference.)

Court Costs:

Reimbursement Fees:

\$ 310.00

\$ 0

Was the victim impact statement returned to the attorney representing the State? NA

(FOR STATE JAIL FELONY OFFENSES ONLY) Is Defendant presumptively entitled to diligent participation credit in accordance with Article 42A.559, Tex. Code Crim. Proc.? NA

Total Jail Time Credit:

If Defendant is to serve sentence in county jail or is given credit toward fine and costs, enter days credited below.

 DAYS NOTES:

This cause was called for trial by jury and the parties appeared. The State appeared by her District Attorney as named above.

Counsel / Waiver of Counsel (select one)

Defendant appeared with counsel.

Defendant appeared without counsel and knowingly, intelligently, and voluntarily waived the right to representation by counsel in writing in open court.

Defendant was tried in absentia.

Both parties announced ready for trial. It appeared to the Court that Defendant was mentally competent to stand trial. A jury was selected, impaneled, and sworn, and Defendant entered a plea to the charged offense. The Court received the plea and entered it of record.

The jury heard the evidence submitted and argument of counsel. The Court charged the jury as to its duty to determine the guilt or innocence of Defendant, and the jury retired to consider the evidence. Upon returning to open court, the jury delivered its verdict in the presence of Defendant and defense counsel, if any.

The Court received the verdict and **ORDERED** it entered upon the minutes of the Court.

Punishment Assessed by Jury / Court / No election (select one)

Jury. Defendant entered a plea and filed a written election to have the jury assess punishment. The jury heard evidence relative to the question of punishment. The Court charged the jury and it retired to consider the question of

punishment. After due deliberation, the jury was brought into Court, and, in open court, it returned its verdict as indicated above.

Court. Defendant elected to have the Court assess punishment. After hearing evidence relative to the question of punishment, the Court assessed Defendant's punishment as indicated above.

No Election. Defendant did not file a written election as to whether the judge or jury should assess punishment. After hearing evidence relative to the question of punishment, the Court assessed Defendant's punishment as indicated above.

In accordance with the jury's verdict, the Court **ADJUDGES** Defendant **GUILTY** of the above offense. The Court **FINDS** that the Presentence Investigation, if so ordered, was done according to the applicable provisions of Subchapter F, Chapter 42A, Tex. Code Crim. Proc.

The Court **ORDERS** Defendant punished in accordance with the jury's verdict or Court's findings as to the proper punishment as indicated above. After having conducted an inquiry into Defendant's ability to pay, the Court **ORDERS** Defendant to pay the fine, court costs, reimbursement fees, and restitution, if any, as indicated above and further detailed below.

Punishment Options (select one)

Confinement in State Jail or Institutional Division. The Court **ORDERS** the authorized agent of the State of Texas or the County Sheriff to take and deliver Defendant to the Director of the Correctional Institutions Division, TDCJ, for placement in confinement in accordance with this judgment. The Court **ORDERS** Defendant remanded to the custody of the County Sheriff until the Sheriff can obey the directions of this paragraph. Upon release from confinement, the Court **ORDERS** Defendant to proceed without unnecessary delay to the District Clerk's office, or any other office designated by the Court or the Court's designee, to pay or to make arrangements to pay any fine, court costs, reimbursement fees, and restitution due.

County Jail—Confinement / Confinement in Lieu of Payment. The Court **ORDERS** Defendant committed to the custody of the County Sheriff immediately or on the date the sentence commences. Defendant shall be confined in the county jail for the period indicated above. Upon release from confinement, the Court **ORDERS** Defendant to proceed without unnecessary delay to the District Clerk's office, or any other office designated by the Court or the Court's designee, to pay or to make arrangements to pay any fine, court costs, reimbursement fees, and restitution due.

Fine Only Payment. The punishment assessed against Defendant is for a **FINE ONLY**. The Court **ORDERS** Defendant to proceed immediately to the District Clerk's office, or any other office designated by the Court or the Court's designee, to pay or to make arrangements to pay the fine, court costs, reimbursement fees, and restitution ordered by the Court in this cause.

Confinement as a Condition of Community Supervision. The Court **ORDERS** Defendant confined 180 days in as a condition of community supervision. The period of confinement as a condition of community supervision starts when Defendant arrives at the designated facility, absent a special order to the contrary.

Fines Imposed Include (check each fine and enter each amount as pronounced by the court):

- General Fine (§12.32, 12.33, 12.34, or 12.35, Penal Code, Transp. Code, or other Code) \$ **5,000** (not to exceed \$10,000)
- Add'l Monthly Fine for Sex Offenders (Art. 42A.653, Code Crim. Proc.) \$ _____ (\$5.00/per month of community supervision)
- Child Abuse Prevention Fine (Art. 102.0186, Code Crim. Proc.) \$ _____ (\$100)
- EMS, Trauma Fine (Art. 102.0185, Code Crim. Proc.) \$ _____ (\$100)
- Family Violence Fine (Art. 42A.504 (b), Code Crim. Proc.) \$ _____ (\$100)
- Juvenile Delinquency Prevention Fine (Art. 102.0171(a), Code Crim. Proc.) \$ _____ (\$50)
- State Traffic Fine (§ 542.4031, Transp. Code) \$ _____ (\$50)
- Children's Advocacy Center Fine - as Cond of CS (Art. 42A.455, Code Crim. Proc.) \$ _____ (not to exceed \$50)
- Repayment of Reward Fine (Art. 37.073/42.152, Code Crim. Proc.) \$ _____ (To Be Determined by the Court)
- Repayment of Reward Fine - as Cond of CS (Art. 42A.301 (b) (20), Code Crim. Proc.) \$ _____ (not to exceed \$50)
- DWI Traffic Fine (a/k/a Misc. Traffic Fines) (§ 709.001, Transp. Code) \$ _____ (not to exceed \$6,000)

Execution / Suspension of Sentence

The Court **ORDERS** Defendant's sentence **EXECUTED**. The Court **FINDS** that Defendant is entitled to the jail time credit indicated above. The attorney for the state, attorney for the defendant, the County Sheriff, and any other person having or who had custody of Defendant shall assist the clerk, or person responsible for completing this judgment, in calculating Defendant's credit for time served. All supporting documentation, if any, concerning Defendant's credit for time served is incorporated herein by this reference.

*****ANY CAPIAS ISSUED IN THIS CASE PRIOR TO THE DATE OF JUDGMENT IS WITHDRAWN*****

Furthermore, the following special findings or orders apply:

Special Order Regarding Confinement as a Condition of Community Supervision

X Having **ORDERED** Defendant to serve a term of confinement as a condition of community supervision, the Court **ORDERS** the term of confinement as a condition of the community supervision to begin on 6/16/2026.

Removal from Office

X The Court further **ORDERS** that, pursuant to the Defendant's conviction in this case and in accordance with Section 87.031(a) of the Texas Local Government Code, the Defendant be immediately removed from the office of Fort Bend County Judge, State of Texas, because he has been convicted by a petit jury for a felony.

Date Judgment Entered: 6/16/2026

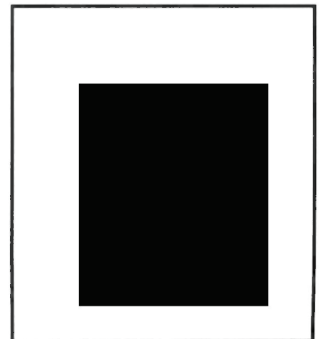
X *Magne R. Granillo*
JUDGE PRESIDING

FILED

JUN 16 2026 ⁸⁰
AT 4:56 P M.
Randy M. Ben Wall
CLERK DISTRICT COURT, FORT BEND CO., TX



DEPUTY PAUL S. POUILLARD
FORT BEND COUNTY S.O. BADGE # 4008



THE STATE OF TEXAS	§	IN THE DISTRICT COURT OF
	§	
VS.	§	FORT BEND COUNTY, TEXAS
	§	
KYLE PRASAD GEORGE	§	458TH JUDICIAL DISTRICT COURT

CONDITIONS OF COMMUNITY SUPERVISION

EXHIBIT "A"

- A. Commit no offense against the laws of this state or of any other state of the United States;
- B. Avoid any use of dangerous drugs, controlled substances, substances with THC (including CBD oils), and alcoholic beverages;
- C. Avoid persons or places of disreputable or harmful character (including frequenting or going about places where intoxicating beverages are sold);
- D. Report, in person, to the Fort Bend County Community Supervision and Corrections Department during the normal working hours of said department, and on today's date and on the same date of each month thereafter unless a different date, within one calendar month is agreed to by yourself and your Community Corrections officer; and obey all the rules and regulations of the Fort Bend County Community Supervision and Corrections Department. Refrain from disorderly conduct, abusive language or disturbing the peace while present at any Fort Bend County Community Supervision and Corrections Department or facility.
- E. Permit the Community Corrections officer to visit you at your home or elsewhere;
- F. Work faithfully at a suitable employment as far as possible, and provide verification at each office visit;
- G. Remain within the limits of the State of Texas unless you have received prior written permission from the Court through your Community Corrections officer to leave the State. You are not permitted to change your place of residence unless you receive prior permission from the Court through your Community Corrections officer;
- H. Pay to the Fort Bend County Community Supervision and Corrections Department a fee of \$60.00 during the normal working hours of the Fort Bend County Community Supervision and Corrections Department on today's date and on the same date of each month thereafter during your term of community supervision;

*Runs cc w
25DCR 110889A*

- I. Support your dependents, if any (this includes the payment of all court ordered child support);
- J. Notify your Community Corrections officer within 24 hours of any change of employment;
- K. Submit an accurately completed and signed Community Supervisor's Monthly Report to your Community Corrections officer;
- L. You are to submit to random test for alcohol and/or drugs by the Fort Bend County Community Supervision and Corrections Department. Provide proof of any medication legally prescribed to you prior to submitting a specimen. The fee for said test shall be paid by you to the Fort Bend County Community Supervision and Corrections Department within ten (10) days of the giving of a specimen;

M. Pay your court costs in the amount of \$ 310 and your reimbursement fees in the amount of \$ 0 (total fees \$ 310), on or before the 16th day of June, 2028; Said payments will be made through the Fort Bend County Community Supervision and Corrections Department;

N. Pay your fine in the amount of \$ 5000, in equal monthly installments of \$ 100, with the first installment due on the 16th day of July, 2026 and a like installment due on the same day of each month thereafter until paid in full; Said payments will be made through the Fort Bend County Community Supervision and Corrections Department;
Run c/c w/ 25 DCR 110889A

O. Pay restitution in the amount of \$ NA in equal installments of \$ _____, with the first payment due on the _____ day of _____, 20____ and a like installment due on the same day of each month thereafter until paid in full. Said payments will be made through the Fort Bend County Community Supervision and Corrections Department;

P. Reimburse Fort Bend County for your court-appointed attorney's fees in the amount of \$ NA, payable as follows: In equal installments of \$ _____ with the first payment due on the _____ day of _____, 20____, and a like installment due on the same day of each month thereafter until paid in full; Said payments will be made through the Fort Bend County Community Supervision and Corrections Department;

Q. The defendant is to serve 180 days in the Fort Bend County jail, to be served as follows:

- Beginning instanter/on the 16 day of JUNE, 2026; ~~or~~

Runs CC 25 DCR 110889A

R. The defendant is to complete 200 hours of Community Service Restitution for Fort Bend County as assigned by the Community Service Restitution Coordinator at a rate of not less than four hours per week starting by, but not later than, 30 days from the date of this order. The hours are to be completed by the ^{16th} day of August, 2027; *Runs CC*

S. The defendant is to complete within 30 days of this order, a drug/alcohol evaluation through an agency which offers such services and which is approved by the Fort Bend County Community Supervision and Corrections Department. If the treatment is necessary, the defendant shall abide by any and all treatment directives, comply with the rules and regulations of the approved agency and pay all costs incurred for such services. The defendant shall continue in said treatment until successfully completed as stated, in writing, by the defendant's counselor and Community Corrections Officer;

T. Complete within 30 days from the date of this order, an evaluation through the Fort Bend County Community Supervision and Corrections Department's Literacy Lab. If the average skill level required under Article 42.12, section 11(c) is not met, the defendant is to participate in a literacy program until meeting the required skill level and at the direction of the Fort Bend Community Supervision and Corrections Department as approved by the Judge of this Court;

U. The defendant is to make a one-time payment of \$100.00 to the local Crime Stoppers. Said payment is due within 90 days of the date of this order; *Runs CC*

V. The defendant is to make a \$100.00 payment to the "crime victims" program, as defined by Article 56.01 of the Texas Code of Criminal Procedure. Said payment is due within 30 days of the date of this order. Further, if the victim of this offense is paid any monies pursuant to the "crime victims" program, the defendant is hereby ordered to reimburse the general fund for any amount paid from that fund for any amount paid from that fund to the victim; *Runs CC*

W. The defendant will submit a blood sample or other specimen to the Texas Department of Public Safety, under Subchapter G, Chapter 411 of the Texas Government Code, for the purpose of creating a DNA record of the defendant within 90 days of the date of this order;

X. The defendant is to make a payment of \$15.00 if the defendant seeks to pay the fine, court costs, or restitution over a period of time rather than immediately. Said payment is due within 30 days of the date of this judgment; Said payments will be made through the Fort Bend County Community Supervision and Corrections Department;

Y. Do not possess, ship, transport, or receive any firearms or ammunition.

Z. The defendant is to complete within 30 days of this order, a risk assessment by the Community Supervision and Corrections Department or an agency approved by the department, and if deemed necessary,

participate in the Fort Bend County Sanction's Court, successfully complete required treatment programs and to follow all rules and regulations of said court;

AA. The defendant shall not use any device or substance to adulterate a drug test. A urine sample which has a specific gravity of less than 1.003, less than 20 mg/dl of creatine, a ph of less than 3 or which contains pyridine, chromium, glutaraldehyde, squalene or potassium nitrate is prima facie evidence of adulteration;

SPECIAL AMENDMENT TO TERMS OF COMMUNITY SUPERVISION

CAUSE # 25-DCR-110888A GEORGE, KYLE PRASAD

kg CONDITION SA11 ✓

The defendant is to attend and successfully complete an **Anti-Theft Program** within 180 days of the date of this order. The defendant will be responsible for any costs of the program and provide your officer with satisfactory written verification of attendance.

kg CONDITON SA12 ✓

The defendant will enroll and successfully complete a **Moral Reconation Therapy** at the direction of the Fort Bend County Community Supervision and Corrections Department within 180 days of the date of this order. The defendant will be responsible for any costs of the program and provide your officer with satisfactory written verification of attendance.

kg CONDITION SA19 ✓

The defendant is to have no contact, or attempted contact, whether in person, by electronic communication, in writing, through a third party, or otherwise with **Taral Patel** while on community supervision.

kg CONDITION SA20 ✓

The defendant shall not use, access, post social media.

kg CONDITION SA21 ✓

The defendant shall have no employment that involves being a fiduciary over monetary access.

I, Defendant, George, Kyle Prasad, after having consulted with my defense attorney WAIVE the requirement of a risk and needs assessment before the assignment of conditions of community supervision. (Art.42A.301).

Kyle Prasad
Defendant

J. R. Al
Attorney for Defendant
State Bar Number 00788715

SIGNED on 6/16/2026

**NOTICE OF JUDICIAL CLEMENCY FOR DEFENDANTS PLACED
ON COMMUNITY SUPERVISION**

You are hereby notified that if the court determines that you have satisfactorily fulfilled the conditions of your community supervision, upon expiration of your community supervision, if certain requirements are met, you may be able to receive judicial clemency from the court.

Under Article 42A.701, Code of Criminal Procedure, the Court may use its discretion to exercise judicial clemency in terminating your community supervision if:

1. The court determines that you have satisfactorily fulfilled the conditions of your community supervision;
2. The term of your community supervision has expired, including any amended or modified term of your community supervision;
3. The court discharges you from community supervision; and
4. The court sets aside the verdict in your case or permits you to withdraw your plea.
5. The Court hereby verifies that an inquiry as to the Defendant's ability to pay fine and court costs has been complied with at the time of plea.
6. The Court has considered the results of a validated risk and needs assessment before the assignment of conditions of community supervision - OR - the Defendant has waived the required assessment (Art.42A.301).

If the above requirements are met, the Court is authorized to dismiss the accusation, complaint, information, or indictment against you and to release you from all penalties and disabilities resulting from your conviction or plea. However, if the court releases you from the consequences of your conviction or plea, if you are subsequently convicted of another offense, your conviction or plea will be made known to the judge, and if you are an applicant for or holder of a license issued by the Department of Family and Protective Services (hereinafter "Department"), the Department may consider that you previously received community supervision as a factor in issuing, renewing, denying, or revoking a license.

This does not apply to a defendant convicted of an offense under Sections 49.04-49.08, Penal Code; an offense the conviction of which requires registration as a sex offender under Chapter 62; or a felony described by Article 42A.054.

IT IS SO ORDERED. SIGNED 6/16/2026

FILED

Margie R. Juarez
Judge Presiding

JUN 16 2026 *RO*

AT 4:56 P M.

Brenda M. Ann Walker
CLERK DISTRICT COURT, FORT BEND CO., TX

S.T.E.P.

SANCTIONS TOWARD EFFECTIVE COMMUNITY SUPERVISION

Your failure to comply with any of the conditions of community supervision shall constitute a violation of community supervision and make you subject to revocation.

The following modifications will be imposed, AT A MINIMUM, should the listed violations occur. However, a MOTION TO REVOKE your community supervision can be filed for ANY community supervision violations including the ones listed below.

ANY UNEXCUSED FAILURE TO REPORT FOR SCHEDULED APPOINTMENTS WITH SUPERVISION OFFICERS, FAILURE TO ATTEND ANY REQUIRED PROGRAM, or FAILURE TO APPEAR IN COURT WHEN DIRECTED TO DO SO BY THE JUDGE OR THE SUPERVISION OFFICER, MAY RESULT IN THE FOLLOWING SANCTIONS:

1. FIRST INSTANCE: WEEKEND (3 DAYS) IN JAIL AS A CONDITION OF COMMUNITY SUPERVISION
2. SECOND INSTANCE: FOUR (4 DAYS) IN JAIL AS A CONDITION OF COMMUNITY SUPERVISION
3. THIRD INSTANCE: SEVEN (7 DAYS) IN JAIL AS A CONDITION OF COMMUNITY SUPERVISION

TESTING POSITIVE AND/OR ADMITTING TO THE USE OF ILLEGAL DRUGS, CONTROLLED SUBSTANCE, OR ALCOHOL:

1. FIRST INSTANCE: WEEKEND (3 DAYS) IN JAIL AS A CONDITION OF COMMUNITY SUPERVISION
2. SECOND INSTANCE: FOUR (4 DAYS) IN JAIL AS A CONDITION OF COMMUNITY SUPERVISION
3. THIRD INSTANCE: SEVEN (7 DAYS) IN JAIL AS A CONDITION OF COMMUNITY SUPERVISION

IN ADDITION TO THE FOREGOING SANCTIONS, ANY UNEXCUSED FAILUIRE TO REPORT MAY ALSO RESULT IN THE COURT ISSUING A CAPIAS FOR YOUR ARREST WITH A BOND WHICH MAY HAVE CONDITIONS ATTACHED. IF YOU BOND OUT YOU WILL IMMEDIATELY REPORT TO YOUR SUPERVISION OFFICER OR BE SUBJECT TO ANOTHER WARRANT FOR YOUR ARREST. IF YOU DO NOT BOND OUT, YOU WILL BE TRANSPORTED FROM THE FORT BEND COUNTY JAIL TO THE NEXT SESSION OF SANCTIONS COURT TO ANSWER TO THE COURT FOR YOUR FAILURE TO REPORT.

I HAVE READ OR HAVE HAD THE SANCTIONS RULES READ TO ME. I UNDERSTAND AND AGREE TO WHATEVER MODIFICATIONS OF THE CONDITIONS OF COMMUNITY SUPERVISION IS IMPOSED FOR FAILING TO ABIDE BY THE CONDITIONS OF MY COMMUNITY SUPERVISION. I UNDERSTAND ALSO THAT MY COMMUNITY SUPERVISION CAN BE REVOKED FOR ANY VIOLATION OF COMMUNITY SUPERVISION AND THAT THE ABOVE RULES ARE THE MINIMUM THAT WILL BE IMPOSED ON ME.

6-16-26
DATE

[Signature]
DEFENDANT

6-16-26
DATE

[Signature]
ATTORNEY FOR DEFENDANT

6/16/26
DATE

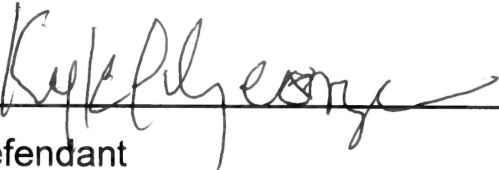
Richard #208
SUPERVISION OFFICER

FILED

JUN 16 2026 ^{FE}
AT 4:56 P M.
[Signature]
CLERK DISTRICT COURT, FORT BEND CO., TX

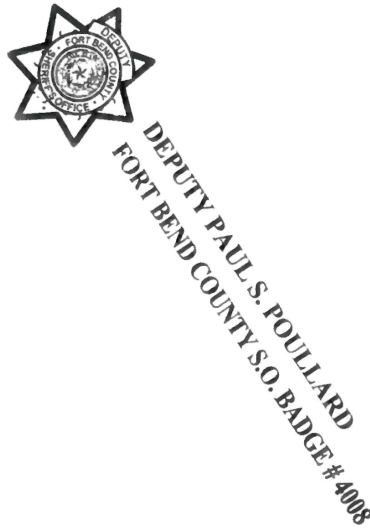
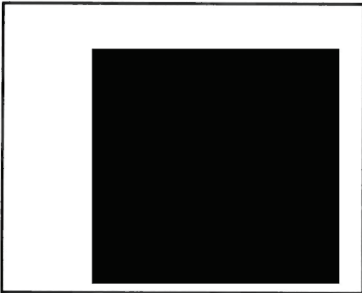
ACKNOWLEDGMENT

I, the defendant, hereby acknowledge that I have received a copy of the terms and conditions of community supervision set forth in "EXHIBIT A".



Defendant

Signed 6/16/2026



Defendant's Right thumb-print, taken by:

Name/ Title

Signed 6/16/2026

Your community supervision officer is Jim Systra / Richard #208

EXHIBIT B



CAUSE NO. 25-DCV-335003

SARAH L. ROBERTS
Plaintiff

v.

K.P. GEORGE
*Defendant, In his Official Capacity as
County Judge of Fort Bend, County,
Texas*

§
§
§
§
§
§
§
§

IN THE DISTRICT COURT OF
FORT BEND COUNTY, TEXAS
400TH JUDICIAL DISTRICT

ORDER

ON THIS DAY, the following was ordered by the Court:

IN ACCORDANCE WITH TEXAS LOCAL GOVERNMENT CODE §87.017 THE
COURT HEREBY SUSPENDS DEFENDANT KYLE PRASAD "K.P." GEORGE AS
COUNTY JUDGE OF FORT BEND COUNTY;

THE COURT HEREBY APPOINTS DANIEL WONG AS COUNTY JUDGE TO
PERFORM THE DUTIES OF THE OFFICE UNDER TEXAS LOCAL
GOVERNMENT CODE §87.017; DANIEL WONG SHALL EXECUTE A BOND IN
THE AMOUNT OF \$50,000.00 IN ACCORDANCE WITH TEXAS LOCAL
GOVERNMENT CODE §87.017(b);

Signed this 10th day of April 2026

[Signature]
JUDGE JETH JONES
400th JUDICIAL DISTRICT
JUDGE PRESIDING

FILED

APR 10 2026

AT 11:54 PM
[Signature]
CLERK DISTRICT COURT, FORT BEND CO., TX

EXHIBIT C


Texas Bar No. 24140421
Avery Krushall
Texas Bar No. 24104338
Justin Karam
Texas Bar No. 24149120
7100 Regency Square Boulevard, Suite 140
Houston, Texas 77036
Tel: (832) 433-7977
Fax: (855) 423-4529
litigation@theadilawfirm.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The foregoing Notice of Nonsuit Pursuant to Rule 162 of Texas Rules of Civil. This is to certify that a true and correct copy of the **Plaintiff's Notice of Nonsuit with Prejudice** was served by electronic service, electronic mail, certified mail, return receipt requested, courier receipted delivery, and/or facsimile on each attorney of record and/or party in accordance with Rule 21a of the TEXAS RULES OF CIVIL PROCEDURE on June 17, 2026.

Via E-Service

Jared R. Woodfill
woodfillservice@gmail.com
5850 San Felipe, 5th Floor
Houston, TX 77057
Tel: (713) 751-3080
ATTORNEYS FOR K. P. George

By: 

Husein Hadi

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Husein Hadi on behalf of Husein Hadi
Bar No. 24067641
Efile@thehadilawfirm.com
Envelope ID: 116258375
Filing Code Description: Motion (No Fee)
Filing Description: Notice of Nonsuit
Status as of 6/17/2026 1:48 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	6/17/2026 11:58:43 AM	SENT

Associated Case Party: K. P. George


Name	BarNumber	Email	TimestampSubmitted	Status
Jared Woodfill		woodfillservice@gmail.com	6/17/2026 11:58:43 AM	SENT

EXHIBIT D

APPROVED AS TO FORM AND SUBSTANCE:

Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 

Husein Hadi

Texas Bar No. 24067641

Jamil Thomas

Texas Bar No. 24066914

Sedrick Stagg

Texas Bar No. 24102815

Ahson B. Wali

Texas Bar No. 24106815

Seve Thomas

Texas Bar No. 24115145

Ariana Mehdipour

Texas Bar No. 24123765

Anita Mehdipour

Texas Bar No. 24126491

Nicholas Thomas

Texas Bar No. 24140421

Avery Krushall

Texas Bar No. 24104338

Justin Karam

Texas Bar No. 24149120

7100 Regency Square Boulevard, Suite 140

Houston, Texas 77036

Tel: (832) 433-7977

Fax: (855) 423-4529

litigation@theadilawfirm.com

Attorneys for Plaintiffs

EXHIBIT E



COUNTY ATTORNEY
Fort Bend County, Texas

BRIDGETTE SMITH-LAWSON
County Attorney

(281) 341-4555
Fax (281) 341-4557

To: Department Heads/Elected Officials
Date: June 24, 2026
Re: Appointment of Interim County Judge Daniel Wong

ATTORNEY CLIENT PRIVILEGE

Dear Fort Bend County Department Leaders:

I hope this communication finds you well. In response to questions to our office regarding the status of the appointment of interim County Judge Wong, this notification is to inform you of the status.

As you all may know, K.P. George was sentenced last week on Tuesday June 16, 2026 in the criminal case. Separately, the civil case filed under Local Government Code Chapter 87 for removal of K.P. George was non-suited by the Plaintiff and all matters of controversy disposed. Mr. Wong was appointed pursuant to Local Government Code 87.017 allowing for suspension of an officer (K.P. George) and the appointment of a temporary officer pending trial. There is no trial in this matter and it is now closed due to the non-suit. The temporary order of appointment is now extinguished by operation of law. As a result, Mr. Wong no longer holds the legal authority to act as County Judge and is not an employee of Fort Bend County.

Attached for your reference please find attached the Order of Appointment, the Notice of Non-Suit, including the signed Order disposing this matter. Please immediately initiate your department's standard protocols for offboarding and separation using your kind assistance to facilitate the same.

Please contact our office directly if you have any questions. Thank you.

Sincerely,



**BRIDGETTE SMITH-LAWSON
COUNTY ATTORNEY
FORT BEND COUNTY, TEXAS**

cc: Michelle Turner
LaNetra Lary
Kevin Hedges
Huma Ahmed

EXHIBIT F

 Legal Status - Response to Inquiries to our offi...

From: Rickert, Bill <Bill.Rickert@fortbendcountytexas.gov>
Sent: Wednesday, 24 June 2026 17:04:12
To: Nehls, TreverJ <TreverJ.Nehls@fortbendcountytexas.gov>
Subject: Fwd: Legal Status - Response to Inquiries to our office

Sent from my iPhone

Begin forwarded message:

From: "Smith-Lawson, Bridgette"
<Bridgette.Smith-Lawson@fortbendcountytexas.gov>
Date: June 24, 2026 at 16:15:00 CDT
To: "Ledet, Nicole"
<Nicole.Ledet@fortbendcountytexas.gov>,
"Lindemann, Brooke"
<Brooke.Lindemann@fortbendcountytexas.gov>,
"Rickert, Bill"
<Bill.Rickert@fortbendcountytexas.gov>,
"Sturdivant, Ed"
<Ed.Sturdivant@fortbendcountytexas.gov>,
"Doughtie, Robyn"
<Robyn.Doughtie@fortbendcountytexas.gov>

  Reply



Mail



Calendar



Apps

< Legal Status - Response to Inquiries to our offi...

"Scott, Wyatt"

<Wyatt.Scott@fortbendcountytexas.gov>, "Knight,

James" <James.Knight@fortbendcountytexas.gov>

Cc: "Turner, Michelle"

<Michelle.Turner@fortbendcountytexas.gov>,

"Lary, LaNetra"

<LaNetra.Lary@fortbendcountytexas.gov>,

"Hedges, Kevin"

<Kevin.Hedges@fortbendcountytexas.gov>,

"Ahmed, Huma"

<Huma.Ahmed@fortbendcountytexas.gov>

Subject: Legal Status - Response to Inquiries to our office

ATTORNEY CLIENT PRIVILEGE -NOT FOR DISSEMINATION OR DISTRIBUTION TO ANY OUTSIDE PARTIES

****Commissioners are bcc'd on this email communication. Please do not reply all to this email.****

Good afternoon, Department Heads/Elected Officials – please find attached an update in

← ∨ Reply



Mail



Calendar



Apps

< Legal Status - Response to Inquiries to our offi...

**ATTORNEY CLIENT PRIVILEGE -NOT FOR
DISSEMINATION OR DISTRIBUTION TO ANY
OUTSIDE PARTIES**

****Commissioners are bcc'd on this email communication. Please do not reply all to this email.****

Good afternoon, Department Heads/Elected Officials – please find attached an update in response to questions to our office along with legal documents for your review. Also, if there are other department heads/officials key to the separation process that are not included on this email, please let us know. Thank you.

Bridgette Smith-Lawson

County Attorney

Fort Bend County

401 Jackson Street, 3rd Floor

Richmond, Texas 77469

Phone: 281-341-4555

Email: Bridgette.smith-lawson@fortbendcountytexas.gov

This communication, including the documents

← ∨ Reply



Mail



Calendar



Apps

< Legal Status - Response to Inquiries to our offi...

Bridgette Smith-Lawson

County Attorney

Fort Bend County




401 Jackson Street, 3rd Floor

Richmond, Texas 77469

Phone: 281-341-4555

Email: Bridgette.smith-lawson@fortbendcountytexas.gov

This communication, including the documents attached and/or transmitted with it, is intended solely for the individual or entity to which it is addressed and may contain information subject to the attorney-client and/or attorney work product privilege, confidential and/or exempt from disclosure under applicable law. The transmission, accidental or otherwise, of these documents and information to a person, entity, or telephone other than those designated above is totally inadvertent. It is not the intent to waive any applicable privilege with the inadvertent, incorrect transmission of these documents and information. If you are not the intended recipient (or the employee or agent responsible for the delivery of these documents and information to the intended recipient), any dissemination, distribution, or copying of these documents, or the information contained therein is strictly prohibited. If you have received

← ∨ Reply    ...



Mail



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Apps

EXHIBIT G



DEXTER L. McCOY
COMMISSIONER

CONTACT:
Mimi Arce
Administrative Manager
Fort Bend County, Precinct 4
346-538-9554 | Mimi.Arce@fbctx.gov

FOR IMMEDIATE RELEASE
Wednesday, June 24, 2026

Commissioner Dexter McCoy Urges Daniel Wong to Follow the Law and Immediately Vacate Position as Interim County Judge

(Richmond, Texas) – Today, Precinct 4 Commissioner Dexter McCoy issued the following statement following troubling indications that former Interim County Judge Wong will refuse to vacate the County Judge’s office following the withdrawal of the civil lawsuit that created his interim appointment. Wong's interim appointment ended June 17, following the sentencing of KP George.

In addition to the withdrawal of the lawsuit, yesterday, County Attorney Bridgette Smith-Lawson issued additional legal guidance to Commissioners noting that:

“[The] order officially concluded the litigation and dissolved the temporary appointment. Consequently, Mr. Wong no longer possesses the legal authority to act as County Judge....Currently, there are only four lawfully seated members of the Commissioners Court-the elected precinct commissioners. Because these four members constitute a legal quorum, the Court can and should proceed with county business without a presiding County Judge. Mr. Wong cannot legally participate in Commissioners Court meetings or hold himself out as the current judge unless he secures and presents a new, active court order.”

“Mr. Wong will be on the ballot in front of voters in a few months. His attempts to stay in office at all costs are a clear indication that he knows what their verdict will be,” said McCoy. “The rule of law is a cornerstone of American democracy, and the law is crystal clear in this case. Now that the litigation that initiated Mr. Wong’s appointment has been dismissed, his temporary appointment has ended. Instead of leadership that is open and accountable we have had one judge who broke the law while in office and it would appear that Mr. Wong now seeks to break the law to stay in office. Fort Bend County residents deserve much better.”

“The task before my colleagues and me must be to ensure that we focus on the issues of the people of Fort Bend County, and not on the issues of politicians. It’s old and we are all tired of it. We must continue to deliver high-quality services, make our community more affordable, and uphold truth and transparency in county government.”

####

Fort Bend County is home to over 900,000 people and is one of the fastest growing counties and most ethnically diverse counties in the nation. Commissioner McCoy took office in 2023 to serve Fort Bend Precinct 4’s 250,000 residents. For more information on Commissioner Precinct 4 visit [FBCTX.gov/Precinct4](https://fbctx.gov/Precinct4) or follow [@FBCprecinct4](https://twitter.com/FBCprecinct4) on social media.



EXHIBIT H

STONE HILTON

June 25, 2026

Bridgette Smith-Lawson
Fort Bend County Attorney
301 Jackson St
Richmond, TX 77469
(281) 341-4555
Bridgette.Smith-Lawson@fbctx.gov

via email and for immediate public release

Re: County Judge Daniel Wong

Ms. Smith-Lawson:

On behalf of County Judge Daniel Wong, I write in response to your meritless and legally unsupported public and private statements regarding Judge Wong's status as the chief executive of Fort Bend County. You have contended that Judge Wong is no longer an officer of the county because of a private plaintiff's unilateral decision to nonsuit her case in *Roberts v. George*, No. 25-DCV-335003 (400th Dist. Ct., Fort Bend County, Texas). Simply put, you are wrong.

The district judge's appointment order in that case, the Local Government Code, and the Texas Constitution all point to one conclusion: Daniel Wong is the County Judge of Fort Bend County. We demand that you immediately withdraw and correct your statements to the contrary and that you undo any actions that you have taken pursuant to your mistaken legal analysis.

1. The order appointing Judge Wong remains in effect by its own terms.

You have incorrectly concluded that the order appointing Judge Wong terminated as a result of the unilateral decision by the plaintiff—a Democrat partisan—to nonsuit her civil case against KP George following his criminal conviction. But neither the order appointing Judge Wong nor the disposition of the civil case provide for this outcome. The appointment order itself is open ended and is not limited by time or made contingent on the happening of any event. It simply provides that the court “hereby appoints Daniel Wong as County Judge to perform the duties of the office.” The civil case was immediately terminated upon the filing of the notice of nonsuit by the plaintiff. *See* Tex. R. Civ. P. 162. And the Court's subsequent order regarding the nonsuit does not undo Judge Wong's appointment. Accordingly, your conclusion that Judge Wong's status was altered as a result of the conclusion of that case is wrong.



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2. The plain text of Texas Local Government Code § 87.017 does not provide for the termination of the order appointing Judge Wong.

The plain text of Texas Local Government Code § 87.017 does not contemplate the dismissal of the underlying suit in which suspension and appointment of a replacement is ordered. It merely states that the district judge may temporarily suspend the officer and appoint another person to perform the duties of the office, and nobody—not even you—has challenged the validity of that appointment.

This statute gives the district judge two extraordinary powers: the ability to temporarily suspend a sitting officer, and the ability to “appoint another person to perform the duties of the office.” *Id.* § 87.017(a). The statute does not give the district judge the ability to limit or condition that appointment in any way. Moreover, George has been fully removed from office as a result of his criminal conviction. You do not contend that George could or should be restored to office, whether as a result of a trial in *Roberts v. George* or otherwise. Accordingly, the Local Government Code provides for no mechanism to limit or terminate Judge Wong’s appointment as County Judge because of the unique circumstances of the situation.

3. The holdover provision of the Texas Constitution requires Judge Wong to continue to perform the duties of his office.

The Texas Constitution requires Judge Wong to continue as Fort Bend County Judge until his successor takes office. The text of the section reads that “all officers of this State shall continue to perform the duties of their offices until their successors shall be duly qualified.” Tex. Const. art. XVI, § 17. As explained in the 2018 editor’s notes of the provision, this is “to prevent public convenience from suffering because of a vacancy in office, and to insure against vacancies in office.” Tex. Const. art. XVI, § 17 interp. commentary (West 2018).

This is exactly the situation faced here. George cannot resume the office of county judge. Even if Judge Wong’s appointment was extinguished by the dismissal of the underlying case—as explained above, it was not—George’s inability to resume office means that Judge Wong may not stop performing the duties of the office under the holdover provision until a successor is duly qualified. Indeed, this is not optional for Judge Wong: the Texas Constitution *requires* him to continue to serve the people of Fort Bend County.

Courts across Texas have applied section 17 as such. *See, e.g., In re Reed*, No. 02-22-00113-CV, 2022 WL 1405520, at *8 (Tex. App.—Fort Worth May 4, 2022, no pet.) (invoking article XVI, section 17 to keep an incumbent in office as a holdover pending a special election to fill the resulting vacancy); *Bianchi v. State*, 444 S.W.3d 231, 248–49 (Tex. App.—Corpus Christi–Edinburg 2014, no pet.) (applying article XVI, section 17 to keep a constructively resigned officer in office as a lawful holdover until his successor qualifies); *Crawford v. State*, 153 S.W.3d 497, 504–05 (Tex. App.—Amarillo 2004, no pet.) (applying article XVI, section 17 to hold a resignation ineffective to vacate office absent a qualified successor); *Pyote Indep. Sch. Dist. v. Estes*, 390 S.W.2d 3, 7 (Tex. App.—El Paso 1965, writ ref’d n.r.e.) (recognizing under article XVI, section 17 that unelected school trustees continue to hold office until their successors qualify,

keeping the board functional). Moreover, courts have recognized that the holdover provision applies to county judges for well over 100 years. *See, e.g., State v. Jordan*, 28 S.W.2d 921 (Tex. App.—Amarillo 1930, writ dismissed w.o.j.); *McGhee v. Dickey*, 4 Tex. Civ. App. 104, 23 S.W. 404 (1893, no writ).

Your failure to address or acknowledge this key constitutional provision and the century of precedent speaks volumes about both your motivations and the quality of your legal analysis.

* * *

On behalf of Judge Wong, and for the foregoing reasons, we reiterate our demand that you withdraw and correct your statements to the contrary and that you undo any actions that you have taken pursuant to your mistaken legal analysis. By charging ahead with your woefully inadequate legal opinion, you have sown partisan chaos and disrupted the operation of the Fort Bend County government. For the good of the people of Fort Bend County, we urge you to correct your position immediately.

Sincerely,



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CC: Commissioner Vincent Morales, Jr.
Commissioner Grady Prestage
Commissioner Andy Meyers
Commissioner Dexter L. McCoy

EXHIBIT I



COUNTY ATTORNEY
Fort Bend County, Texas

BRIDGETTE SMITH-LAWSON
County Attorney

(281) 341-4555
Fax (281) 341-4557

To: Chris Hilton

Date: June 25, 2026

Re: Appointment of Interim County Judge Daniel Wong

Mr. Hilton,

I am in receipt of your letter of representation for Mr. Daniel Wong. Please be advised that your arguments ignore clear established Texas Law regarding an Order of Non-Suit with Prejudice. In the future, please refrain from communicating directly with my clients, the four legally seated members of Commissioners Court excluding Mr. Wong and send all correspondence on this matter to this office pursuant to Rule 4.02(A) of the Texas Disciplinary Rules.

Your argument

1. "The Order Appointing Judge Wong remains in effect by its own terms."

Response:

You have incorrectly concluded that the order appointing Judge Wong remains in effect by its own terms. Texas Rules of Civil Procedure 162 clearly states:

"RULE 162. DISMISSAL OR NON-SUIT At any time before the plaintiff has introduced all of his evidence other than rebuttal evidence, the plaintiff may dismiss a case, or take a non-suit, which shall be entered in the minutes. Notice of the dismissal or non-suit shall be served in accordance with Rule 21a on any party who has answered or has been served with process without necessity of court order. Any dismissal pursuant to this rule shall not prejudice the right of an adverse party to be heard on a pending claim for affirmative relief or excuse the payment of all costs taxed by the clerk. A dismissal under this rule shall have no effect on any motion for sanctions, attorney's fees or other costs, pending at the time of dismissal, as determined by the court. Any dismissal pursuant to this rule which terminates the case shall authorize the clerk to tax court costs against dismissing party unless otherwise ordered by the court."

The order of appointment is not a listed action of the court to which the non-suit would have no effect. *General Land Office vs. Oxy U.S.A., Inc* 789 S.W. 2nd 569, 571 (stating that “the GLO’s contention that the appeal is not moot because the trial court did not sign a separate order specifically dissolving the temporary injunction is without merit” because it was not necessary for the trial court to enter such a separate order because when the underlying action was dismissed, the temporary injunction dissolved automatically. Under general Texas law, a nonsuit vitiates interlocutory orders and renders them moot. *UTMB v. Estate of Darla Blackmon*, 196 S.W.3rd 98, 100 (Tex. 2006) (denial of plea to the jurisdiction).

Because the Section 87.017 appointment is an interlocutory order tied to the pendency of the removal litigation, a nonsuit would eliminate the underlying case that gave rise to the appointment authority, thereby terminating the interim judge's authority to serve. The statute appointing Mr. Wong does not contain language suggesting the appointment operates independently of the litigation or survives dismissal. The title of the statute “Suspension Pending Trial; Temporary Appointee” is clear that the appointment is temporary pending the trial not a permanent appointment that you are suggesting. Moreover, in this instance this case was resolved and finalized by a signed “Non-Suit with Prejudice”.

A non-Suit with prejudice forever bars the Plaintiff from bringing her claims again against KP George. A non-Suit with prejudice brings the parties to the status quo where they were prior to a filing and cannot be re-litigated. KP George in the civil matter, does not have a judgment against him and is restored back to status quo. Your argument proposes that this particular civil case resulted in two County Judges, one elected and the other appointed. Your arguments cannot be reconciled to basic civil procedure and overlooks the obvious legislative intent of the statute. It also contemplates that your client has a permanent appointment. Your arguments are flawed and create a dangerous precedent.

Your argument

2. The plain text of the Texas Local Government Code Section 87.017 does not provide for the termination of the order appointing Judge Wong.

Response:

Again, this argument is flawed. Look to the plain meaning and title of the statute “Suspension Pending Trial; Temporary Appointee”. There is no legal stretch needed to clearly see the purpose of the appointment as it is stated in the title. I do not disagree that the District Judge has authority to suspend a sitting officer and the ability to appoint another person to perform the duties of the office” I personally assisted Mr. Wong’s transition when he was initially appointed understanding the legality of his appointment. However, the statute clearly states that this is a temporary appointment pending trial. There is no trial. There is no indication that the legislature divested in the District Judge hearing a removal action the power to make a permanent appointment to Commissioners Court. The Texas Government Code gives that authority only to the Commissioners Section 87.041 of the Texas Government Code. The Local Government Code does not provide a mechanism to limit or terminate the appointment under Section 87.017 as the Texas Rules of Civil Procedure clearly defines in ALL civil matters in Texas what happens when a non-suit occurs. And in this instance, the temporary appointment, which is an interlocutory order, does not survive a non-suit under Texas Law and well established case precedent.

Your argument:

3. The holdover provision of the Texas Constitution requires Judge Wong to continue to perform the duties of his office.

Response:

Quite frankly, my office predicted that this argument would be presented in this scenario despite it not being applicable. Let's be clear, Mr. Wong did not assume the office of County Judge pursuant to the Texas Constitution. He assumed the office by way of a temporary appointment under Local Government Code 87.017. He has not been elected nor appointed to fill a vacancy. The sole legal authority that qualified Mr. Wong to serve, is no longer valid. Therefore, he is unqualified to continue the position as a holdover. The holdover provisions are applicable to elected and appointed officers to a legally defined vacancy in the State of Texas. Neither scenario applies in this instance. Your arguments overlook the basics of how Mr. Wong came into position. The holdover provision is not applicable in this instance.

Please take time and look at the facts wholistically and objectively before making accusations that the team of lawyers in my office are off basis in our legal analysis. We have taken every step to analyze this matter in the most objective way possible while balancing the overall protections of our client, Fort Bend County. Mr. Wong should have consulted with a lawyer prior to accepting the appointment to evaluate the legal forecasts of his appointment which was always contingent upon a willing plaintiff to prosecute her personal legal matter. Chaos and disruption have not occurred as the business of the county can still go forth. There are four legally seated Commissioners constituting a quorum that can conduct the business of the County. Adding a member without clear authority to participate in conducting the business of the county will cause chaos, disruption and uneasiness with residents and all those who do business with Fort Bend County. This is not a partisan action. This is a clear legal problem. Accept it as such, and refrain from partisan accusations for the good of the people of Fort Bend County. Section 551.142 of the Government Code regarding Open Meetings states:

“(a) an interested person, including a member of the news media, may bring an action by mandamus or injunction to stop, prevent, or reverse a violation or threatened violation of this chapter by members of a governmental body.”

I urge you to have your client consider the risk to the County and not his own personal ambitions in insisting that he has a permanent right to the position of County Judge. Currently, we still do not have a “live” order clearly establishing Mr. Wong’s continued right to the office. When you obtain one, please forward the same and we will happily review it. But thank you for your opinion.

Sincerely,



**BRIDGETTE SMITH-LAWSON
COUNTY ATTORNEY
FORT BEND COUNTY, TEXAS**

cc: Michelle Turner
LaNetra Lary
Kevin Hedges
Huma Ahmed