

NO. _____

THE STATE OF TEXAS,	§	IN THE DISTRICT COURT OF
<i>Plaintiff,</i>	§	
	§	
v.	§	FORT BEND COUNTY, TEXAS
	§	
DANIEL WONG,	§	
<i>Defendant.</i>	§	_____ JUDICIAL DISTRICT

**THE STATE'S PETITION FOR LEAVE TO FILE
AN INFORMATION IN THE NATURE OF QUO WARRANTO**

To the Honorable Court:

This case concerns legal title to public office. Daniel Wong is exercising the powers of Fort Bend County Judge. Nothing gives him that authority. Texas law governing this matter is settled. Wong's claim to the office of Fort Bend County Judge depends entirely on the April 10 order. That order is void as the court that issued it did not have jurisdiction. And even if the April 10 order ever had legal effect, any authority it conferred died when the underlying case was non-suited. The State of Texas, acting through the Fort Bend County Attorney, therefore seeks leave to file an information in the nature of quo warranto, respectfully showing as follows:

INTRODUCTION

Daniel Wong is exercising the powers of Fort Bend County Judge. But what gives him that authority? Wong's claim depends on one document: the April 10, 2026 order in the Roberts ouster case. (Ex. 6). But that order is void and gives him no title at all.

The order is void because the Roberts case was prosecuted by a private citizen alone — not by the State. (Exs. 2–8). A qualified resident may start the Chapter 87 process, but only the State can maintain an ouster suit. *Compare* Tex. Loc. Gov't Code § 87.015(b), *with id.* § 87.018(b), (f). The Supreme Court of Texas has made the point directly: "Individual citizens . . . have no right to maintain an ouster suit without being joined by a proper state official." *In re Wolfe*, 341 S.W.3d 932, 932 (Tex. 2011) (per curiam) (quoting *Garcia v. Laughlin*, 285 S.W.2d 191, 194 (Tex. 1955)). "Without joinder of the proper state official," the court lacks subject-matter jurisdiction "to hear and determine the cause." *Id.*

Orders entered without jurisdiction are void, not merely voidable. *In re K.N.*, No. 24-0881, 2026 WL 1614378, at *6 (Tex. June 5, 2026) (slip op.; mandate not yet issued); *In re Panchakarla*, 602 S.W.3d 536, 539 (Tex. 2020) (per curiam); *Mapco, Inc. v. Forrest*, 795 S.W.2d 700, 703 (Tex. 1990). And a void order is "entirely null within itself," is "not susceptible of ratification or confirmation," and its nullity "cannot be waived." *Easterline v. Bean*, 49 S.W.2d 427, 429 (Tex. 1932); *Slaughter v. Qualls*, 162 S.W.2d 671, 674 (Tex. 1942) (explaining that an act that is a "mere nullity," "passing no title and conferring no rights whatsoever," is "absolutely void"). The April 10 order therefore gave Wong nothing — no appointment, no authority, and no legal title to act as county judge.

The result is the same even if the April 10 order was valid when signed. On June 17, 2026, Roberts nonsuited "all claims for relief and the entire case," effective immediately. (Ex. 7). The court granted the nonsuit with prejudice that same day. (Ex. 8). Once the Chapter 87 case ended, any temporary appointment ended with it. Indeed, a nonsuit can vitiate interlocutory orders and render them moot. *Villafani v. Trejo*, 251 S.W.3d 466, 469 (Tex. 2008). And when a case supporting a temporary injunction is nonsuited, "the temporary injunction cease[s] to exist." *Gen. Land Office v. OXY U.S.A., Inc.*, 789 S.W.2d 569, 571 (Tex. 1990). Put simply, a temporary Chapter 87 order cannot outlive the case that created it.

The holdover clause does not rescue Wong's claimed title. *See* Tex. Const. art. XVI, § 17. The clause keeps a lawful officer in place until a successor is duly qualified. *Id.* It does not transform a void order into title to public office. And even if valid, the April 10 order did not give Wong title. Section 87.017(a) authorizes a temporary appointee only to "perform the duties of the office." It does not authorize him to "hold" the office. *Compare* Tex. Loc. Gov't Code § 87.017(a) (authorizing a temporary appointee only to "perform the duties of the office"), *with id.* § 87.041(c) (providing that a vacancy appointee "shall hold office until the next general election"). Wong's contrary reading would exceed the holdover clause's limited purpose and produce two absurd results:

- First, a temporary Chapter 87 appointee could turn a void order – or, at most, an order that ended with the nonsuit – into constitutional title to public office.
- Second, Fort Bend County would have two persons claiming one office: George, the elected County Judge, who remains the officeholder until December 31, 2026, despite his suspension pending criminal appeal (Ex. 12); and Wong, whose only claimed entitlement comes from a void Chapter 87 order that, if ever operative, ended when Roberts nonsuited her ouster.

But the holdover clause presupposes lawful officeholding — it does not create lawful officeholding. *See Ex parte Sanders*, 215 S.W.2d 325, 326–27 (Tex. 1948) (explaining lawful officeholding is a prerequisite to holdover status). Nor does it allow two people to hold the same office of county judge at the same time. Tex. Const. art. V, § 15 (providing that there shall be "a County Judge" for each county).

These facts create the very problem quo warranto exists to resolve. Wong continues to claim title to the office of Fort Bend County Judge and to exercise its powers under an order that is void — or at least no longer operative. That claim cannot be left unresolved. The State of Texas, acting through the Fort Bend County Attorney, therefore seeks leave to file an information in the nature of quo warranto so a court can answer the simple question this case presents: Can a temporary Chapter 87 appointee hold the office of County Judge at the same time as the elected officeholder when his only claim to title rests on a void – or expired – order? The answer is "no."

JUDICIAL NOTICE AND INCORPORATION

Under Texas Rule of Evidence 201, the State requests that the Court take judicial notice of the pleadings, filings, orders, judgments, and procedural status reflected in the following matters:

(a) **Roberts's Ouster.** Cause No. 25–DCV–335003; *Sarah L. Roberts v. KP George in his official capacity as County Judge of Fort Bend County, Texas*; In the 400th Judicial District Court of Fort Bend County, Texas.

(b) **Misdemeanor Charge.** Cause No. 24–CCR–241836; *The State of Texas v. Kyle Prasad George*; In the Fort Bend County Court at Law No. 5. (Texas Election Code § 255.005(a)).

(c) **First Money Laundering Count.** Cause No. 25–DCR–110888A; *The State of Texas v. Kyle Prasad George*; In the 458th Judicial District Court of Fort Bend County, Texas. (Tex. Penal Code § 34.02(e)(2)).

(d) **Second Money Laundering Count.** Cause No. 25–DCR–110889A; *The State of Texas v. Kyle Prasad George*; In the 458th Judicial District Court of Fort Bend County, Texas. (Tex. Penal Code § 34.02(e)(2)).

(e) **Appeal from First Money Laundering Count.** Cause No. 14–26–00621–CR; *Kyle Prasad George v. The State of Texas*; In the Fourteenth Court of Appeals.

(f) **Appeal from Second Money Laundering Count.** Cause No. 14–26–00622–CR; *Kyle Prasad George v. The State of Texas*; In the Fourteenth Court of Appeals.

Under Texas Rules of Civil Procedure 58 and 59, the State also incorporates by reference the pleadings, filings, orders, judgments, and other court records from these proceedings that are referenced in this Petition.

I.
REQUEST FOR EXPEDITED SCHEDULE

1. The State requests a tailored Level 3 discovery-control plan and expedited schedule under Rule 190.4, including a prompt hearing on this petition for leave. Tex. R. Civ. P. 190.4 ("The court must, on a party's motion, and may, on its own initiative, order that discovery be conducted in accordance with a discovery control plan tailored to the circumstances of the specific suit.").

2. If leave is granted, the State seeks a prompt hearing on its (i) request for a temporary restraining order, (ii) application for a temporary injunction, and (iii) the earliest practicable trial setting, if a trial setting is necessary. *Id.* at 190.1, 190.4.

3. The State also requests an expedited briefing schedule for cross-motions for summary judgment, with a hearing at the Court's earliest available setting consistent with Rule 166a. *See* Tex. R. Civ. P. 166a. This matter presents a pure legal question: whether the order on which Wong relies gives him legal title to the office. That question does not require discovery. It turns on the governing statutes and controlling law. An expedited summary-judgment schedule would therefore allow the parties to present the dispositive issue promptly and would conserve judicial and public resources.

II. STANDARD FOR LEAVE

4. Under Chapter 66, the Court must grant leave if there is "probable ground for the proceeding." Tex. Civ. Prac. & Rem. Code § 66.002(d).

5. According to the Texas Supreme Court, whether to grant leave to file a quo warranto action is a legal question that asks whether the petition, on its face, fails as a matter of law. *See Paxton v. Annunciation House, Inc.*, 719 S.W.3d 555, 579–81 (Tex. 2025). The Court does not weigh evidence, decide disputed facts, or reach the merits at the leave stage. *See id.*

6. The Court may deny leave only if the proposed quo warranto filing is facially defective — *e.g.*, it alleges no conduct Texas law proscribes, falls within an express legislative prohibition, violates an unambiguous venue requirement, or otherwise fails to state a quo warranto cause of action. *Id.* at 581 ("A motion for leave is therefore not an opportunity to litigate the entire case before it is even filed. Rather, it authorizes a limited facial attack to weed out filings that, due to some legal defect, cannot survive even though the court assumes the truth of the allegations.").

III. PARTIES

7. Plaintiff is the State of Texas (the "State"). The State appears by and through the Fort Bend County Attorney Bridgette Smith-Lawson, the county attorney of the proper county.

8. Chapter 66 of the Texas Civil Practice and Remedies Code authorizes the county attorney of the proper county to petition the district court for leave to file an information in the nature of quo warranto. Tex. Civ. Prac. & Rem. Code § 66.002(a).

9. The State seeks leave to file the proposed information in the name of the State of Texas, as Chapter 66 requires. *Id.* § 66.002(b). The Fort Bend County Attorney brings this Petition on the County Attorney's own motion. *Id.* § 66.002(c).

10. Defendant is Daniel Wong, an individual who purports to hold the office of the Fort Bend County Judge and is currently executing the duties of that office.

11. The office of the county judge is a Texas constitutional county office. Tex. Const. art. V, § 15. The county judge also serves as presiding officer of the county commissioners court. *Id.* art. V, § 18(b).

12. After the Court grants leave and orders the Information filed, Wong can be served with citation through his counsel, Christopher D. Hilton, Stone Hilton PLLC, 600 Congress Avenue, Suite 2350, Austin, Texas 78701, or wherever Wong can be found. Tex. Civ. Prac. & Rem. Code § 66.002(d); Tex. R. Civ. P. 780.

IV.
STATEMENT OF RELIEF

13. The State seeks only non-monetary quo warranto relief under Texas Civil Practice and Remedies Code § 66.003(1). The State does not seek judgment for costs or a fine. *See* Tex. Civ. Prac. & Rem. Code §§ 66.003(2), (3).

14. To the extent Texas Rule of Civil Procedure 47 applies, the State seeks only non-monetary relief within this Court's jurisdictional limits. Tex. R. Civ. P. 47(b), (c)(5).

V.
JURISDICTION AND VENUE

15. This Court has subject-matter jurisdiction over this quo warranto proceeding.

16. Chapter 66 authorizes the county attorney of the proper county, when grounds for the remedy exist, to petition the district court of the proper county for leave to file an information in the nature of quo warranto. Tex. Civ. Prac. & Rem. Code § 66.002(a).

17. This petition is brought in the name of the State of Texas, as required by § 66.002(b). *Id.* § 66.002(b).

18. This Court also has jurisdiction because Texas district courts have original jurisdiction over actions, proceedings, and remedies except where

jurisdiction has been conferred exclusively on another court, tribunal, or administrative body. Tex. Const. art. V, § 8; Tex. Gov't Code § 24.007(a).

19. Fort Bend County is the proper county under § 66.002(a). Wong is exercising the powers of Fort Bend County Judge in Fort Bend County. The office at issue is a Fort Bend County office, and the alleged unlawful holding or execution of that office is occurring in Fort Bend County.

20. Venue is proper in Fort Bend County. To the extent the general venue rule applies, all or a substantial part of the events or omissions giving rise to this proceeding occurred in Fort Bend County, where Wong claims to hold, and is executing, the office of County Judge of Fort Bend County. Tex. Civ. Prac. & Rem. Code § 15.002(a)(1).

21. Accordingly, this Court is a district court of the proper county and may grant leave, order the proposed information filed, and order process issued if probable ground exists for this proceeding. *Id.* § 66.002(d).

VI. STANDING / AUTHORITY TO PROSECUTE

22. The Fort Bend County Attorney has authority to bring this proceeding. The Texas Constitution provides that county attorneys represent the State in district and inferior courts in their respective counties, subject to legislative allocation of duties where a district attorney exists. *See* Tex. Const. art. V, § 21.

23. The Legislature has specifically assigned the Fort Bend County Attorney all powers, duties, and privileges in Fort Bend County relating to quo warranto proceedings, except as provided by Texas Government Code § 43.181(d). Tex. Gov't Code § 45.179(f).

24. Section 43.181(d) confirms that the Fort Bend County District Attorney has no power, duty, or privilege in Fort Bend County relating to quo warranto proceedings unless the County Attorney fails or refuses to act. Tex. Gov't Code § 43.181(d).

25. The Fort Bend County Attorney files this Petition on the County Attorney's own motion under § 66.002(c), and not at the request of an individual relator. *See* Tex. Civ. Prac. & Rem. Code § 66.002(c). Accordingly, no private relator is named.

26. The State of Texas is the plaintiff in this proceeding, and the County Attorney is the authorized public officer through whom the State acts. *Id.* §§ 66.002(b), (c).

VII. PUBLIC OFFICE AT ISSUE

27. The office at issue is the office of County Judge of Fort Bend County, Texas.

28. The County Judge is a constitutional county officer. The Texas Constitution establishes a county court in each county and provides that a County

Judge shall be elected in each county by the qualified voters, shall be well informed in the law of the State, shall be a conservator of the peace, and shall hold office for four years and until a successor is elected and qualified. Tex. Const. art. V, § 15.

29. The County Judge is also a member and presiding officer of the county commissioners court. The Texas Constitution provides that the County Judge, as presiding officer, and the county commissioners compose the county commissioners court, which exercises the powers and jurisdiction over county business conferred by the Constitution and laws of this State. Tex. Const. art. V, § 18(b). The Local Government Code likewise provides that the members of the commissioners court are the county judge and county commissioners, and that the county judge, if present, is the presiding officer of the commissioners court. Tex. Loc. Gov't Code § 81.001(a)–(b).

30. The office of County Judge of Fort Bend County is therefore a public county office within the meaning of Chapter 66 of the Texas Civil Practice and Remedies Code.

31. Chapter 66 authorizes quo warranto when a person usurps, intrudes into, or unlawfully holds or executes an office. Tex. Civ. Prac. & Rem. Code § 66.001(1).

32. Wong claims to be the Fort Bend County Judge. In that claimed capacity, Wong purports to exercise the powers, duties, privileges, and authority of

that office, including presiding over the Fort Bend County Commissioners Court and participating in the transaction of Fort Bend County business.

33. Because Wong claims the right to hold and execute the office of County Judge of Fort Bend County, Texas, his legal right to hold or execute that office is properly tested in a quo warranto proceeding brought in the name of the State of Texas. *See* Tex. Civ. Prac. & Rem. Code §§ 66.001(1), 66.002(b).

VIII. FACTUAL GROUNDS FOR PROCEEDING

34. The factual sequence that created this dispute begins with the election that placed George in office.

A. George was elected Fort Bend County Judge in 2018, reelected in 2022, and remains the legal incumbent unless a lawful vacancy occurs.

35. George was elected Fort Bend County Judge in 2018. He was reelected in 2022 to a term that runs through December 31, 2026.¹

36. George is currently suspended without pay. But suspension is not removal. Unless and until George is lawfully removed, resigns, dies, or another vacancy-creating event occurs, he remains the duly elected Fort Bend County Judge.² (Ex. 12).

¹ *See* https://ballotpedia.org/KP_George

² *See id.*

37. Texas law has long drawn that line. A suspension may prevent an officer from presently exercising the powers of the office and receiving its compensation. But it does not divest the officer of title to the office, and it does not make the office vacant. The Supreme Court of Texas made the point more than a century ago: "Still a suspension is in no proper sense the same thing as a removal. We are not at liberty by construction or otherwise to hold that the provisions of the Constitution with regard to removals apply equally to suspensions from office." *Griner v. Thomas*, 104 S.W. 1058, 1059 (Tex. 1907) (quoting *Poe v. State*, 72 Tex. 625, 10 S.W. 737, 740 (1889)).

38. That distinction controls here. George's suspension did not remove him or vacate the office. The office remains occupied. *See id.* And because the office is not vacant, no one may be appointed under the vacancy-filling statutes to replace George, assume his title, or hold himself out as the Fort Bend County Judge. *See id.*

39. The relevant appointment power confirms this. The Commissioners Court has a vacancy-filling power — not a power to replace a suspended incumbent. The Texas Constitution provides that "[a] ***vacancy*** in the office of County Judge . . . shall be filled by the Commissioners Court." Tex. Const. art. V, § 28(b) (emphasis added). Likewise, Chapter 87 provides that "[t]he commissioners court of a county may fill a ***vacancy***" in certain county offices. Tex. Loc. Gov't Code § 87.041(a)(1). Both provisions require the same predicate — an actual vacancy.

40. The Supreme Court of Texas has enforced that requirement in a similar context. In *State ex rel. Angelini v. Hardberger*, the Court held that a judge's future-dated resignation did not create a present vacancy and, therefore, that the Governor lacked power to appoint a successor until the office actually became vacant. 932 S.W.2d 489, 491–95 (Tex. 1996). The Court later reaffirmed that rule in *In re Dallas County*, explaining that "the vacancy occurs on the date the justice actually leaves office or, in this case, the date the office is actually created, regardless of forewarning." 697 S.W.3d 142, 164–65 (Tex. 2024) (orig. proceeding). Thus, appointment authority arises only when the office is actually vacant. It does not arise because of a suspension. *See id.*; *Hardberger*, 932 S.W.2d at 491–95.

41. The Attorney General has applied the same rule to suspended officers. In an analogous opinion, the Attorney General explained that "[t]he suspension of the elected prosecutor does not create a vacancy in his office; it prevents him from performing its duties pending final resolution" of the underlying proceeding. Tex. Att'y Gen. Op. No. MW–404, at 2 (1981).

42. So unless and until George is lawfully removed or otherwise vacates the office, the office is not vacant. And unless the office is vacant, no vacancy-filling appointment may be used to install a successor. George remains the Fort Bend County Judge through the end of his term unless a lawful vacancy occurs before then.

B. During George's second term, the State charged him with one misdemeanor and later indicted him on two felony counts.

43. During his second term, George became the subject of three criminal charges. The first was a misdemeanor. In 2024, before the criminal court suspended him, the State charged George in *State of Texas v. George*, No. 24–CCR–241836, with misrepresentation of identity under Texas Election Code § 255.005. (Ex. 9).

44. The misdemeanor charging instrument alleges that George misrepresented his identity in a campaign communication by posing as Facebook user "Antonio Scalywag" on George's own Facebook page. It further alleges that George did so "with intent to injure a candidate or influence the result of an election." (Ex. 9).

45. The next year, the State brought two felony charges. In early 2025, George was indicted in *State of Texas v. George*, Nos. 25–DCR–110888A and 25–DCR–110889A, on two counts of money laundering under Texas Penal Code § 34.02(e)(2). (Exs. 10–11).

C. After Roberts criticized George during public comment, George cut off her remarks and had her removed from the podium.

46. While the criminal charges against George were pending, the Fort Bend County Commissioners Court met on July 8, 2025. Roberts appeared at that meeting and addressed the Court during public comment.³

³ See <https://fortbendcountytexas.new.swagit.com/videos/349053> at 57:59–59:47.

47. Roberts's comments concerned George. She criticized him and referred to his "multiple felony indictments."⁴

48. George then stopped Roberts from continuing. He interrupted her, instructed her to stop speaking, and turned off her microphone.⁵

49. George also directed a sheriff's deputy to remove Roberts from the podium. The deputy then escorted Roberts away from the podium.⁶

D. Roberts prosecuted a private removal case against George; the State was not joined, and the proper state official did not appear for the State.

50. After George removed Roberts from the July 8, 2025 Commissioners Court meeting, Roberts filed a Chapter 87 removal proceeding against him in *Roberts v. George*, No. 25–DCV–335003. (Exs. 2–8).

51. Roberts filed that proceeding after July 8, 2025. So the amended version of Chapter 87 governed her petition. *See* Act of June 20, 2025, 89th Leg., R.S., ch. 601, §§ 5–6; Tex. Loc. Gov't Code § 87.018(f).

52. Under Chapter 87, a qualified resident may file a removal petition. Tex. Loc. Gov't Code § 87.015(b). But filing a petition is not the same thing as maintaining and prosecuting the State's ouster remedy. Texas law draws that line clearly.

⁴ *See id.* at 58:50–59:06.

⁵ *See id.* at 59:08–59:47.

⁶ *See id.*

53. A Chapter 87 removal proceeding must be conducted "in the name of the State of Texas, and on the relation of the person filing the petition." Tex. Loc. Gov't Code § 87.018(b). And for petitions governed by the amended statute, the State's representative is not the private relator and not the county attorney. It is the prosecuting attorney appointed by the presiding judge of the administrative judicial region. *Id.* § 87.018(f).

54. Section 87.018(f) provides that, "[i]n a proceeding to remove an officer under this subchapter," the presiding judge "shall appoint a prosecuting attorney from another judicial district or county, as applicable, in the administrative judicial region to represent the state." *Id.* § 87.018(f). Chapter 87 defines "prosecuting attorney" as "a district attorney or a county attorney with criminal jurisdiction." *Id.* § 87.011(5).

55. Nor could the Fort Bend County Attorney fill that role by simply appearing in the case. The Legislature repealed the former provisions that assigned ordinary Chapter 87 representation to the county attorney or district attorney in certain cases. *See* Act of June 20, 2025, 89th Leg., R.S., ch. 601, § 4. The amended statute instead required appointment of a prosecuting attorney from another judicial district or county. Tex. Loc. Gov't Code § 87.018(f). The Fort Bend County Attorney therefore was not the Chapter 87 official authorized to represent the State in Roberts's ouster.

56. The record does not show that the State was joined through any prosecuting attorney appointed under § 87.018(f). (Exs. 2–8). It does not show an appointment order by the presiding judge. *Id.* It does not show an appearance by any appointed prosecuting attorney for the State. *Id.* And it does not show that any such official prosecuted the case. *Id.*

57. That defect is jurisdictional. The Supreme Court of Texas has long held that private citizens have "no right to maintain an ouster suit without being joined by a proper state official." *In re Wolfe*, 341 S.W.3d at 932 (quoting *Garcia*, 285 S.W.2d at 194). "Without joinder of the proper state official," the court lacks subject-matter jurisdiction "to hear and determine the cause." *Id.* The reason is basic: "[i]n order that the district judge and the district court may have jurisdiction to hear and determine the cause," the parties bringing the action must have "legal capacity to institute and maintain the suit." *Garcia*, 285 S.W.2d at 194.

58. Because Roberts maintained the removal proceeding without the State and without the appointed § 87.018(f) prosecuting attorney, the court lacked jurisdiction to enter any ouster order against George. Any such order is void. *See In re K.N.*, No. 24-0881, 2026 WL 1614378, at *6 ("But when a court lacks genuine subject-matter jurisdiction, its orders are void, not merely voidable"); *In re Panchakarla*, 602 S.W.3d at 539; *PNS Stores, Inc. v. Rivera*, 379 S.W.3d 267, 272 (Tex. 2012) ("We have described a judgment as void when 'the court rendering

judgment had no jurisdiction of the parties or property, no jurisdiction of the subject matter, ...") (quoting *Travelers Ins. Co. v. Joachim*, 315 S.W.3d 860, 862–63 (Tex. 2010)).

59. The defect also could not be waived or insulated from collateral attack. A void judgment may be attacked directly or collaterally. *Rivera*, 379 S.W.3d at 271–72. And "[s]ubject-matter jurisdiction cannot be waived, and can be raised at any time." *Alfonso v. Skadden*, 251 S.W.3d 52, 55 (Tex. 2008) (per curiam).

60. The result is straightforward: Roberts could file a Chapter 87 petition if she satisfied § 87.015(b). But she could not carry the State's removal remedy to judgment by herself.

E. The April 10 order is void; in any event, it only purports to authorize Wong to perform duties during George's temporary suspension.

61. Despite the absence of the State and the absence of any proper state official, the court signed an order in the Roberts removal case on April 10, 2026. (Ex. 6).

62. The April 10 order did not remove George from office. It purported to temporarily suspend him as Fort Bend County Judge. It also purported to appoint Wong "as county judge to perform the duties of the office under Texas Local Government Code § 87.017" during that temporary suspension. The order further required Wong to execute a \$50,000 bond under § 87.017(b). (*Id.*)

63. Because the State was not joined in Roberts's removal case, and because the case was not maintained or prosecuted through a proper state official, the court lacked jurisdiction to enter the April 10 order. *See In re Wolfe*, 341 S.W.3d at 932. For that reason alone, the order is void. A void order cannot suspend an elected county judge, create a vacancy, or transfer legal title to public office. *See Rivera*, 379 S.W.3d at 272; *Joachim*, 315 S.W.3d at 862–63.

64. But even if the April 10 order were valid, it would not establish that Wong holds the office of Fort Bend County Judge. The order invokes § 87.017. That statute is a temporary-duty statute. It is not a removal statute. It is not a vacancy-filling statute. And it is not a title-conferring statute.

65. Section 87.017 is titled "Suspension Pending Trial; Temporary Appointee." Tex. Loc. Gov't Code § 87.017. Its text authorizes a district judge, after citation issues, to "temporarily suspend the officer" and to "appoint another person to perform the duties of the office." *Id.* § 87.017(a). That language does two limited things: it temporarily suspends the elected officer's ability to perform the office's duties, and it allows another person to perform those duties while the removal case remains pending.

66. Section 87.017 does not say that the temporary appointee "holds" the office. It does not say that the temporary appointee fills a vacancy. It does not say

that the temporary appointee serves a term. It says only that the temporary appointee may "perform the duties of the office." *Id.*

67. The bond requirement confirms the point. Section 87.017(b) requires the temporary appointee to execute a bond before the officer may be suspended. *Id.* § 87.017(b). That bond protects the suspended officer if the grounds for removal are later found at trial to be insufficient or untrue. *Id.* And if the final judgment establishes the officer's right to the office, the county must pay the officer an amount equal to the compensation received by the temporary appointee. *Id.* § 87.017(c).

68. Those provisions assume the elected officer may still have the legal right to the office. They assume the officer may win the removal case. And they treat the § 87.017 appointee as a temporary substitute who performs duties during the case — not as a successor who acquires title to the office.

69. Removal requires more. Chapter 87 provides that "[o]fficers may be removed only following a trial by jury." Tex. Loc. Gov't Code § 87.018(a). Until a final removal judgment, there is no removal. And without removal or some other vacancy-creating event, there is no vacancy to fill.

70. Chapter 87 uses different language when it addresses an actual vacancy. Section 87.041 provides that the Commissioners Court may "fill a vacancy" in the office of county judge, and that the person appointed to fill such a vacancy "shall **hold** office until the next general election." *Id.* § 87.041(a)(1), (c) (emphasis added).

Section 87.017 contains no comparable "hold office" language. *Compare id.* § 87.017(a), *with id.* § 87.041(a)(1), (c).

71. The difference matters. Section 87.041 concerns legal title to a vacant office. Section 87.017 concerns only the temporary performance of duties while a removal case is pending. One fills a vacancy. The other does not. One says the appointee "shall hold office." The other does not.

72. The Texas Ethics Commission has drawn the same distinction under § 87.017. In Advisory Opinion No. 196, the Commission explained that a person appointed under § 87.017 has "the right and duty to perform the duties" of the office during the pendency of the removal trial, but "is not" the officeholder and does not "hold" the office. Tex. Ethics Comm'n Op. No. 196 (1994).

73. The April 10 order tracks § 87.017's limited framework. It does not state that Wong was appointed to fill a vacancy. It does not identify any vacancy. It does not appoint Wong under § 87.041. It does not set a term of office. And it does not state that Wong "holds" the office of Fort Bend County Judge. (Ex. 6).

74. At most, the April 10 order purports to appoint Wong under § 87.017 to perform the duties of the office while George is temporarily suspended. (Ex. 6). It gives Wong no legal title to the office. It does not make Wong the Fort Bend County Judge. And it cannot convert a temporary-duty appointment into a vacancy-filling appointment.

75. Thus, the April 10 order fails twice. First, it is void because the court lacked jurisdiction to enter it. Second, even if it were valid, it would authorize only a temporary appointee to perform duties during George's temporary suspension. It would not establish that Wong holds the office of Fort Bend County Judge.

F. After George appealed his felony convictions, the criminal court suspended him without pay pending appeal; it did not declare the office vacant.

76. On June 16, 2026, the 458th Judicial District Court signed two judgments of conviction against George in *State v. George*, Nos. 25–DCR–110888A and 25–DCR–110889A. (Exs. 13–14).

77. Each judgment reflects a jury conviction for money laundering of \$30,000 or more but less than \$150,000 under Texas Penal Code § 34.02(e)(2), a third-degree felony. (*See id.*)

78. George appealed both judgments that same day. His notices of appeal state that he appealed the final judgments and sentences to the First Court of Appeals or the Fourteenth Court of Appeals in Houston. (Exs. 15–16).

79. The same day, the criminal court signed a separate suspension order under Texas Local Government Code § 87.032. (Ex. 12).

80. Section 87.032 addresses the effect of an appeal. It provides that, when an officer appeals, the appeal supersedes an order of removal unless the court finds that the public interest requires suspension pending appeal. Tex. Loc. Gov't Code §

87.032. If the court makes that finding, it "shall suspend the officer as provided by this chapter." *Id.*

81. The June 16 order made only that finding. It states that the court conducted a hearing, received evidence and argument, and found that "it is in the public interest to suspend Defendant, Kyle Prasad George, without pay, pending his appeal from felony convictions in the above-styled causes." (Ex. 12).

82. The order is limited on its face. It suspends George without pay pending appeal. It does not declare the office vacant. (Ex. 12).

83. The order also does not declare the office vacant. It does not direct that a vacancy be filled. It does not identify a successor. And it does not state that any person other than George holds the office of Fort Bend County Judge. (*Id.*)

84. Nor does the order incorporate the April 10 order from the Roberts removal case. It does not cite that order, modify it, extend it, revive it, ratify it, or state that Wong holds office by virtue of that earlier temporary appointment. (*Compare* Ex. 6 *with* Ex. 12).

85. Thus, the criminal court's June 16 order did one thing: it suspended George without pay while his appeals are pending. It did not remove George from office. It did not create a vacancy.

G. Roberts nonsuited the removal case, ending any § 87.017 authority the April 10 order purported to confer.

86. The April 10 order was void for the reasons stated above. The State was not joined in the Roberts removal case, and the case was not maintained or prosecuted through a proper state official. (Exs. 2–8). The court therefore lacked jurisdiction to enter any order suspending George or appointing Wong.

87. But even if the April 10 order had been valid when signed, it did not survive the case that supplied it. Section 87.017 authorizes only temporary relief in a pending removal proceeding. Once that proceeding ended, any temporary appointment under § 87.017 ended with it.

88. That is what happened here. On June 17, 2026, Roberts filed a notice of nonsuit in *Roberts v. George*, No. 25–DCV–335003. (Ex. 7).

89. The notice was broad. Roberts nonsuited "all claims for relief and the entire case" against George. The nonsuit was effective immediately on filing. (*Id.*)

90. The court then signed an order the same day granting the nonsuit and dismissing the removal case with prejudice. (Ex. 8).

91. A nonsuit has immediate legal effect. It "extinguishes a case or controversy from 'the moment the motion is filed'" and "renders the merits of the nonsuited case moot." *Univ. of Tex. Med. Branch at Galveston v. Estate of Blackmon ex rel. Shultz*, 195 S.W.3d 98, 100 (Tex. 2006) (per curiam) (quoting *Shadowbrook Apts. v. Abu-Ahmad*, 783 S.W.2d 210, 211 (Tex. 1990) (per curiam)). It can also

"vitate certain interlocutory orders, rendering them moot and unappealable." *Villafani*, 251 S.W.3d at 469.

92. The same applies to temporary relief. In *General Land Office*, the Supreme Court of Texas held that, after nonsuit of the underlying case, "the temporary injunction ceased to exist and the appeal became moot." 789 S.W.2d at 571. The Court further explained that no separate dissolution order was required because, "when the underlying action was dismissed, the temporary injunction dissolved automatically." *Id.*

93. The April 10 order was, at most, temporary relief tied to the Roberts removal case. It purported to appoint Wong under § 87.017 "to perform the duties of the office" while George was temporarily suspended during that case. (Ex. 6). It did not fill a vacancy. It did not appoint Wong to a term. And it did not give Wong legal title to the office.

94. So when Roberts nonsuited the entire removal case, there was no pending Chapter 87 proceeding left to support a temporary § 87.017 appointment. The statutory predicate disappeared. The temporary appointment – if it ever had legal effect – ended with the case.

95. The result is unavoidable. After June 17, 2026, Wong could not rely on the April 10 order as authority to act as Fort Bend County Judge. The order was

void from the start. And even if it were not void, it expired when Roberts nonsuited the removal case.

H. No current order or statute gives Wong legal title to the office of Fort Bend County Judge or authority to perform its duties.

96. Taken together, these events leave Wong with no present legal claim to the office of Fort Bend County Judge. No current order gives him title to the office. No current order authorizes him to perform its duties. And no statute automatically installs him in George's place.

97. The April 10 order does not supply that authority. As explained above, that order is void because the court lacked jurisdiction over Roberts's privately maintained removal case. The State was not joined. No proper state official appeared for the State. And without the State's joinder through the proper official, the court had no jurisdiction to suspend George, appoint Wong, or enter any order affecting legal title to the office. *See In re Wolfe*, 341 S.W.3d at 932.

98. A void order has no legal effect. It cannot suspend an elected county judge. It cannot appoint a temporary substitute. It cannot create a vacancy. And it cannot give Wong any right to hold himself out as Fort Bend County Judge.

99. The April 10 order fails for another reason. Even if it had been valid when signed, it was temporary by its own terms and by the statute it invoked. Section 87.017 authorizes a district judge to temporarily suspend an officer and appoint another person "to perform the duties of the office" while the removal case

is pending. Tex. Loc. Gov't Code § 87.017(a). It does not remove the officer. It does not fill a vacancy. And it does not give the temporary appointee legal title to the office.

100. Roberts then nonsuited the entire removal case. (Ex. 7). The court dismissed it with prejudice. (Ex. 8). Once that case ended, there was no pending Chapter 87 proceeding left to support any temporary appointment under § 87.017. So even if the April 10 order had once supplied temporary authority, that authority ended no later than June 17, 2026.

101. George's current suspension does not change the result. The criminal court's June 16 order suspended George without pay pending appeal. (Ex. 12). It did not declare the office vacant. (Ex. 12).

102. Nor did the June 16 order revive or extend the April 10 order. It did not cite the April 10 order. It did not incorporate it. It did not ratify it. And it did not convert Wong's former temporary-duty appointment – if it ever had legal effect – into legal title to the office. (*Compare* Ex. 6 with Ex. 12).

103. Suspension is not removal. George therefore remains the legal incumbent unless and until he is lawfully removed, his term expires, or another vacancy-creating event occurs. Until then, the office is occupied. It is not vacant.

104. If a lawful vacancy later occurs, the replacement process would begin then — not before. For the office of county judge, an actual vacancy is filled by the

Commissioners Court. Tex. Const. art. V, § 28(b); Tex. Loc. Gov't Code § 87.041(a)(1). That vacancy-filling power does not arise unless the office is actually vacant.

105. Wong therefore has no current source of authority. The April 10 order was void. At a minimum, it expired when Roberts nonsuited the removal case. The June 16 suspension order did not declare a vacancy. And the vacancy-filling statutes do not apply because George has not been lawfully removed and the office is not vacant.

106. Wong accordingly has no present right to hold the office of Fort Bend County Judge, assume George's title, or perform the duties of that office.

IX. QUO WARRANTO: VOID ORDER

107. The State incorporates and realleges the allegations in paragraphs 1 through 106 above.

108. The State brings this count in the name of the State of Texas under Chapter 66 of the Texas Civil Practice and Remedies Code. *See* Tex. Civ. Prac. & Rem. Code §§ 66.001(1), 66.002.

109. This count seeks to test Wong's claimed authority to hold or execute the office of Fort Bend County Judge. *See In re Dallas Cnty.*, 697 S.W.3d 142, 152 (Tex. 2024) (orig. proceeding) ("The purpose of a quo warranto proceeding is to question the right of a person or corporation, public or private, to exercise a public

franchise or office." (quoting *Alexander Oil Co. v. City of Seguin*, 825 S.W.2d 434, 436–37 (Tex. 1991)).

110. Fort Bend County Judge is a public office created by Texas law. *See* Tex. Const. art. V, § 15; Tex. Loc. Gov't Code § 87.041(a)(1). Wong claims and exercises authority as Fort Bend County Judge.

111. Wong's claimed authority depends on the April 10 order entered in *Roberts v. George*, No. 25–DCV–335003. That order purported to temporarily suspend George and appoint Wong "as county judge to perform the duties of the office under Texas Local Government Code § 87.017." (Ex. 6).

112. The April 10 order was void when signed. Roberts was a private citizen. The State was not joined in her ouster proceeding, and no proper state official appeared on the State's behalf to prosecute the case. Under Texas law, "[i]ndividual citizens . . . have no right to maintain an ouster suit without being joined by a proper state official." *In re Wolfe*, 341 S.W.3d at 932 (quoting *Garcia*, 285 S.W.2d at 194). "Without joinder of the proper state official," the court does not "have jurisdiction to hear and determine the cause." *Id.*

113. Because the court lacked jurisdiction to hear and determine Roberts's ouster proceeding, the April 10 order conferred no authority on Wong. A court order entered without subject-matter jurisdiction is void. *See In re K.N.*, No. 24-0881, 2026 WL 1614378, at *6 ("But when a court lacks genuine subject-matter

jurisdiction, its orders are void, not merely voidable."); *In re Panchakarla*, 602 S.W.3d at 539 ("If a trial court issues an order 'beyond its jurisdiction,' mandamus relief is appropriate because such an order is void *ab initio*"); *Rivera*, 379 S.W.3d at 272.

114. A void order cannot suspend George, appoint Wong, or give Wong any legal right to hold or execute the office of Fort Bend County Judge.

115. George's later criminal-court suspension does not cure that defect. The criminal court suspended George without pay pending appeal under Texas Local Government Code § 87.032. (Ex. 12). It did not declare the office vacant. (*Compare* Ex. 6 *with* Ex. 12).

116. Wong therefore has no valid source of authority to hold or execute the office of Fort Bend County Judge. By continuing to claim and exercise that authority, Wong "usurps, intrudes into, or unlawfully holds or executes" the office within the meaning of Texas Civil Practice and Remedies Code § 66.001(1).

117. The State therefore asks the Court to grant leave to file an information in the nature of quo warranto on this ground, order process to issue, and, after proceedings as provided by law, enter judgment of ouster removing Wong from any claimed right to hold or execute the office of Fort Bend County Judge. *See* Tex. Civ. Prac. & Rem. Code §§ 66.002(d), 66.003; Tex. R. Civ. P. 780–81.

X.
ALTERNATIVE QUO WARRANTO: EXPIRED ORDER

118. The State incorporates and realleges the allegations in paragraphs 1 through 117 above.

119. The State pleads this count in the alternative. Even if the April 10 order had legal effect when signed, it was temporary and case-specific. It did not give Wong any continuing right to hold or execute the office after the Roberts ouster proceeding ended.

120. The April 10 order was entered under Texas Local Government Code § 87.017. That statute is titled "Suspension Pending Trial; Temporary Appointee." It allows a district judge to "temporarily suspend the officer" and appoint another person "to perform the duties of the office" during that temporary suspension. Tex. Loc. Gov't Code § 87.017(a).

121. The statute does not say that the temporary appointee holds the office. It does not fill a vacancy. And it does not appoint a permanent successor. It authorizes only a temporary appointee to perform duties during the pendency of the removal proceeding. *See id.* § 87.017(a)–(c).

122. The April 10 order used that same limited language. It appointed Wong only "to perform the duties of the office under Texas Local Government Code § 87.017." (Ex. 6). It did not state that Wong holds the office, that he fills a vacancy, or that he may continue acting after the Roberts case ends. (*Id.*)

123. The Roberts case ended on June 17, 2026. Roberts nonsuited "all claims for relief and the entire case" against George, effective immediately on filing, and the court signed an order dismissing the ouster with prejudice. (Exs. 7–8).

124. Under Texas Supreme Court authority, a nonsuit ends the case or controversy. A nonsuit "extinguishes a case or controversy from 'the moment the motion is filed'" and "renders the merits of the nonsuited case moot." *Blackmon*, 195 S.W.3d at 100 (quoting *Abu-Ahmad*, 783 S.W.2d at 211). A nonsuit also "can vitiate certain interlocutory orders, rendering them moot and unappealable." *Villafani*, 251 S.W.3d at 469. The same rule applies to temporary relief. *General Land Office*, 789 S.W.2d at 571 ("when the underlying action was dismissed, the temporary injunction dissolved automatically").

125. The April 10 order was temporary relief in a Chapter 87 ouster case. If it ever supplied Wong with authority, that authority ended when Roberts nonsuited the entire case and the court dismissed it. After that, no pending Chapter 87 proceeding remained to support a temporary appointment under § 87.017.

126. George's criminal-court suspension did not revive the expired April 10 order. The criminal court suspended George without pay pending appeal. (Ex. 12). It did not declare a vacancy in the office of Fort Bend County Judge. (*Compare* Ex. 6 *with* Ex. 12).

127. Nor would any later removal of George give Wong an automatic right to assume the office. If a vacancy in the office of county judge is lawfully created, that vacancy is filled by the Fort Bend County Commissioners Court. Tex. Const. art. V, § 28(b); Tex. Loc. Gov't Code § 87.041(a)(1), (c). Wong has no entitlement to assume the office under an expired temporary order from a dismissed case.

128. Wong therefore has no current source of authority to hold or execute the office of Fort Bend County Judge. By continuing to claim and exercise that authority, Wong "usurps, intrudes into, or unlawfully holds or executes" the office within the meaning of Texas Civil Practice and Remedies Code § 66.001(1).

129. The State therefore asks the Court to grant leave to file an information in the nature of quo warranto on this alternative ground, order process to issue, and, after proceedings as provided by law, enter judgment of ouster removing Wong from any claimed right to hold or execute the office of Fort Bend County Judge. *See* Tex. Civ. Prac. & Rem. Code §§ 66.002(d), 66.003; Tex. R. Civ. P. 780–81.

XI. WONG IS NOT A HOLDOVER UNDER ART. XVI, § 17

130. To accept Wong's holdover theory, this Court would have to answer "yes" to two questions that would produce absurd results.

- First, can a temporary Chapter 87 appointee turn a void order – or, at most, an order that ended with the nonsuit – into constitutional title to public office?

- Second, can Fort Bend County have two county judges for one office — assuming the order appointing Wong is not void and survived the case that created it? George, the elected County Judge who — despite being suspended without pay — still holds the office. (Ex. 12). And Wong, whose claimed entitlement comes from a void Chapter 87 order that — if ever operative — ended when Roberts nonsuited her ouster.

131. The answer to both questions is "no." Otherwise, a void order would achieve what only a lawful election or appointment can do — confer legal title to public office. It would also leave Fort Bend County with two lawful claimants to one office. Texas law does not permit either result.

A. The void April 10 order cannot give Wong the legal title required to hold over.

132. Article XVI, § 17(a) provides that, except as otherwise provided, "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(a). That is a continuity rule. It keeps government functioning when a lawful officer's term, tenure, or appointment would otherwise end before a successor qualifies. It does not create title to office for someone who never lawfully received it.

133. The Supreme Court of Texas applied the provision that way in *Ex parte Sanders*, 215 S.W.2d at 325–26. There, a gubernatorial appointee to a vacant judgeship continued to serve after the next general election until the elected successor could qualify. *Id.* at 326–27. But the appointee could hold over only because he had first become an officer by a lawful appointment. As the Court

explained, the incumbent judge "became an 'officer within this state' by appointment of the Governor" under Article V, § 28. *Id.* Therefore, Article XVI, § 17 allowed him to continue until his successor was duly qualified. *Id.* at 326.

134. Thus, *Sanders* confirms the threshold requirement: the person claiming holdover status must first be a lawful officer. Article XVI, § 17 continues an existing right to perform official duties. It does not supply the missing title. A person cannot hold over in an office he never lawfully held.

135. Wong cannot satisfy that requirement. His only claimed source of authority is the April 10 order. (Ex. 6). But that order was void. Roberts maintained a private Chapter 87 removal proceeding against George without the State, without joinder of the proper state official, and without prosecution by any proper state official. (Exs. 2–8).

136. That defect deprived the court of jurisdiction. The Supreme Court of Texas has held that private citizens "have no right to maintain an ouster suit without being joined by a proper state official." *In re Wolfe*, 341 S.W.3d at 932 (quoting *Garcia*, 285 S.W.2d at 194). And "[w]ithout joinder of the proper state official," the court lacks jurisdiction "to hear and determine the cause." *Id.*

137. Orders entered without jurisdiction are void, not merely voidable. *See In re K.N.*, No. 24-0881, 2026 WL 1614378, at *6; *In re Panchakarla*, 602 S.W.3d at 539. And a void order is no order at all. It is "entirely null within itself," is "not

susceptible of ratification or confirmation," and has a nullity that "cannot be waived." *Easterline v. Bean*, 49 S.W.2d 427, 429 (Tex. 1932); *see also AD Villarai, LLC v. Pak*, 519 S.W.3d 132, 137 (Tex. 2017) (per curiam). A void act is a "mere nullity," "passing no title and conferring no rights whatsoever." *Slaughter*, 162 S.W.2d at 674.

138. The April 10 order therefore could not suspend George, appoint Wong, or give Wong legal title to the office of Fort Bend County Judge. (Ex. 6). And because Wong never lawfully acquired the office, there is nothing for Article XVI, § 17 to continue.

139. Texas law likewise rejects attempts to use the holdover provision to defeat the constitutional appointment process. In *Denison v. State*, the court addressed a gubernatorial appointment to the State Highway Commission. The court held that the expiration of an appointive term created a vacancy for purposes of Article IV, § 12, notwithstanding Article XVI, § 17. The court further held that a nominee whose confirmation had been rejected by the Senate had no "right whatever to occupy the office or to discharge, after such rejection, any of the duties thereof," and that the Governor's subsequent commission was void. 61 S.W.2d 1017, 1021–22 (Tex. Civ. App.—Austin 1933, writ ref'd per curiam, 61 S.W.2d 1022 (Tex. 1933)).

140. The Attorney General applied the same principle to a judicial recess appointment in Opinion JM–1161. The opinion concluded that the district-judge appointee was the *de jure* judge until the Senate adjourned without confirming him, but rejected the argument that article XVI, § 17 allowed him to remain in office thereafter. "Notwithstanding article XVI, section 17," the office became actually vacant and the appointee "ceased to be the judge." Tex. Att'y Gen. Op. No. JM–1161, at 8–9 (1990).

141. Attorney General Opinion O–3343 explains why. If a rejected appointee could hold over until a successor was nominated, confirmed, and qualified, the result would be "a complete disregard" of article IV, § 12. If the officer were not definitely out upon rejection, "no end logically can be found for his service." Tex. Att'y Gen. Op. No. O–3343, at 3 (1941). Article XVI, § 17 cannot be read to produce that result. It preserves lawful continuity — it does not validate a rejected or failed appointment.

142. That rule decides this issue. Wong cannot use the holdover provision to convert a void temporary-appointment order into legal title to public office. Article XVI, § 17 does not cure a void appointment. It does not revive jurisdiction that never existed. And it does not allow Wong to hold over from an office he never lawfully held.

B. Even if the April 10 order had been valid, § 87.017 authorized Wong only to perform duties temporarily; it did not make him the officeholder, and the nonsuit ended any temporary authority the order supplied.

143. Even if the April 10 order had been valid when signed, it still would not give Wong what Article XVI, § 17 requires: lawful title to the office of Fort Bend County Judge.

144. The order was entered under § 87.017. That statute authorizes a district judge to "temporarily suspend" an officer and appoint another person "to perform the duties of the office." Tex. Loc. Gov't Code § 87.017(a). The April 10 order used the same limited language. It appointed Wong "as county judge to perform the duties of the office under Texas Local Government Code § 87.017" during George's temporary suspension. (Ex. 6).

145. Section 87.017 does not say that the temporary appointee "holds" the office. It does not fill a vacancy. It does not create a term. It does not remove the elected officer. And it does not make the temporary appointee the elected officer's successor.

146. Chapter 87 confirms the distinction. When the Legislature means that an appointee holds office, it says so. Section 87.041 – the vacancy-filling provision – allows the Commissioners Court to fill a county-judge vacancy and provides that the person appointed to fill that vacancy "shall *hold* office until the next general election." Tex. Loc. Gov't Code § 87.041(a)(1), (c). Section 87.017 contains no

comparable language. It authorizes only a temporary appointee to "perform the duties of the office." *Compare id.* § 87.017(a), *with id.* § 87.041(a)(1), (c).

147. The surrounding text of § 87.017 points the same way. The statute requires the temporary appointee to execute a bond. *Id.* § 87.017(b). The bond protects the suspended officer if the grounds for removal are later found insufficient or untrue. *Id.* And if final judgment establishes the officer's right to the office, the county must pay the officer an amount equal to the compensation received by the temporary appointee. *Id.* § 87.017(c). Those provisions assume that the elected officer may still have the legal right to the office. They do not treat the temporary appointee as the new officeholder.

148. The Texas Ethics Commission addressed this same statutory distinction. It concluded that a person appointed under § 87.017 may perform the duties of the office during the removal case, but "is not" the officer and does not "hold" the office. Tex. Ethics Comm'n Op. No. 196, at 1–2 & n.1 (1994). The Commission further explained that even if the office were vacant, a § 87.017 appointee still would not "hold" the office.

149. The Attorney General has drawn the same line between suspension, vacancy, and temporary duty performance. In MW–404, the Attorney General explained that suspension "does not create a vacancy" — it merely prevents the elected officer from performing the office's duties while the underlying matter

remains pending. Tex. Att'y Gen. Op. No. MW-404, at 2 (1981). The opinion further explained that the temporary appointment ends when the suspension is lifted or when final removal creates a vacancy that the proper appointing authority may fill. *Id.* at 4.

150. These authorities defeat Wong's position. George's temporary suspension did not create a vacancy. The April 10 order did not fill a vacancy. And Wong's temporary assignment to perform duties under § 87.017 did not make him the lawful holder of the office of Fort Bend County Judge.

151. The nonsuit creates a separate defect. Any authority Wong claimed under the April 10 order was tied to the Roberts removal case. (Exs. 2-8). Roberts then nonsuited "all claims for relief and the entire case." (Ex. 7). The court dismissed the case with prejudice. (Ex. 8). Once that case ended, there was no pending Chapter 87 removal proceeding left to support a temporary appointment under § 87.017.

152. Texas law does not allow temporary relief to outlive the case it supports. A nonsuit "extinguishes a case or controversy from 'the moment the motion is filed'" and "renders the merits of the nonsuited case moot." *Estate of Blackmon*, 195 S.W.3d at 100 (quoting *Abu-Ahmad*, 783 S.W.2d at 211 (Tex. 1990)). Temporary relief dissolves with the underlying case. In *General Land Office*, the

Supreme Court of Texas held that, "when the underlying action was dismissed, the temporary injunction dissolved automatically." 789 S.W.2d at 571.

153. The same principle applies here. The April 10 order was, at most, temporary relief in the Roberts removal case. It existed only to support a pending removal proceeding. If it ever operated at all, it ended when Roberts nonsuited that proceeding and the court dismissed it.

154. JM–1161 reinforces the point. There, the Attorney General rejected an attempt to use Article XVI, § 17 to keep an appointee in office after the legal basis for the appointment failed. The opinion concluded that, "notwithstanding article XVI, section 17," the appointee "ceased to be the judge." Tex. Att'y Gen. Op. No. JM–1161, at 8–9 (1990). Article XVI, § 17 cannot do for Wong what it could not do there: keep an appointee in place after the source of his authority has ended.

155. So even if the April 10 order were valid, Wong still cannot invoke Article XVI, § 17. He never lawfully held the office of Fort Bend County Judge. At most, he had temporary authority to perform duties under § 87.017 while the Roberts removal case was pending. That temporary authority ended with the nonsuit. Article XVI, § 17 cannot convert an expired duty assignment into constitutional holdover status.

C. George remains the legal incumbent pending his criminal appeals; Wong's temporary appointment ended when Roberts nonsuited the removal case.

156. Wong's theory creates a problem Texas law does not tolerate: two county judges for one county office.

157. The office of Fort Bend County Judge is a single office. The Texas Constitution provides that "a County Judge" shall be elected in each county by the qualified voters, shall hold office for four years, and shall continue until a successor is elected and qualified. Tex. Const. art. V, § 15. There is one seat. There is not one seat for the elected county judge and a second seat for a temporary Chapter 87 appointee.

158. George still occupies that seat as the legal incumbent. The criminal judgments included removal language under § 87.031. (Exs. 13–14). But George appealed both judgments the same day. (Exs. 15–16). And the criminal court then proceeded under § 87.032 by suspending George without pay pending appeal. (Ex. 12).

159. Section 87.032 addresses that circumstance. When a county officer appeals a removal judgment, the appeal supersedes the removal order unless the trial court finds that the public interest requires suspension pending appeal. Tex. Loc. Gov't Code § 87.032. If the court makes that finding, it suspends the officer as provided by Chapter 87. *Id.*

160. That is what happened here. The criminal court found that it was "in the public interest to suspend Defendant, Kyle Prasad George, without pay, pending his appeal from felony convictions in the above-styled causes." (Ex. 12).

161. The June 16 suspension order is limited. It suspends George without pay while his appeals are pending. It does not declare the office vacant. And it does not state that anyone other than George holds the office of Fort Bend County Judge. (Ex. 12).

162. Nor does the suspension order revive Wong's April 10 temporary appointment. It does not cite the April 10 order. It does not incorporate that order. It does not extend that order. And it does not convert Wong's former temporary-duty assignment – if it ever had legal effect – into legal title to the office. (*Compare* Ex. 6 *with* Ex. 12).

163. Suspension is not removal. The Supreme Court of Texas said so directly: "a suspension is in no proper sense the same thing as a removal." *Griner*, 104 S.W. at 1059 (quoting *Poe*, 10 S.W. at 740). So while George is suspended from exercising the powers of the office and receiving its compensation, he has not ceased to be the legal incumbent. He remains Fort Bend County Judge pending the outcome of his appeals unless a lawful vacancy occurs before then.

164. Wong cannot also be Fort Bend County Judge. Texas law does not recognize two lawful holders of the same county office at the same time. If George

remains the incumbent, the office is occupied. And if the office is occupied, it is not vacant.

165. That matters because the vacancy-filling power applies only when there is a vacancy. Section 87.041 allows the Commissioners Court to "fill a vacancy" in the office of county judge, and the person appointed to fill that vacancy "shall hold office until the next general election." Tex. Loc. Gov't Code § 87.041(a)(1), (c). But no vacancy-filling authority arises until the office is actually vacant.

166. Wong's claimed authority comes from a different source: the April 10 order in the Roberts removal case. (Ex. 6). That order was void. At minimum, it was temporary and ended when Roberts nonsuited the case. (Exs. 7–8). It did not fill a vacancy. It did not appoint Wong to a term. And it did not make Wong George's successor.

167. George, therefore, remains the legal incumbent, though suspended without pay pending appeal. Wong's temporary appointment under § 87.017 – if it ever had legal effect – ended when Roberts nonsuited the removal case. Because there is only one office and no current vacancy, Wong cannot claim legal title to the office of Fort Bend County Judge.

D. *De facto* status may protect Wong's past acts; it cannot make him a holdover County Judge.

168. *De facto* status is not a path to office. It is a public-protection doctrine. It may protect acts already taken by a person who appeared to act under color of

office. But it does not give that person legal title to the office. It does not make him the lawful officer. And it does not give him a continuing right to exercise the office after his legal authority has ended.

169. A *de jure* officer is the lawful officer — the person with legal title to the office. A *de facto* officer is different. A *de facto* officer has only color or appearance of authority.

170. The Supreme Court of Texas has described a *de facto* officer as someone who has "some colorable right to the office, — some appearance of right which would lead the public without inquiry to suppose him to be the officer he assumes to be." *Cox v. Hous. & Tex. Cent. Ry. Co.*, 4 S.W. 455, 457 (Tex. 1887). The Court of Criminal Appeals has put the same point this way: a *de facto* officer appears to be the officer but is "not a good officer in point of law." *Williams v. State*, 588 S.W.2d 593, 595 (Tex. Crim. App. 1979) (quoting *Weatherford v. State*, 21 S.W. 251 (Tex. Crim. App. 1893)).

171. Article XVI, § 17 applies to *de jure* officers. It provides that, except as otherwise provided, "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(a). That language assumes the person already lawfully holds the office. It continues an existing lawful officer's authority until a successor qualifies. It does not create title for someone who never lawfully acquired the office.

172. Texas courts say the same thing directly. "An officer who holds over after the expiration of his or her term and until such officer's successor has qualified as required by the state constitution is a *de jure* not a *de facto* officer" *Delamora v. State*, 128 S.W.3d 344, 356 (Tex. App.—Austin 2004, pet. ref'd).

173. Wong is not a *de jure* county judge. He was not elected Fort Bend County Judge. He was not appointed by the Commissioners Court to fill a vacancy. And the April 10 order did not appoint him to hold the office for any term. (Ex. 6).

174. At most, the April 10 order purported to appoint Wong under § 87.017 "to perform the duties of the office" during George's temporary suspension. (Ex. 6). That is not legal title to the office. It is, at most, color of authority to perform duties temporarily.

175. Texas law recognizes that difference. In *State v. Cocke*, the Supreme Court of Texas explained that there is "a distinction between the right to an office and the right to enter upon the duties of an office." 54 Tex. 482, 486 (1881). Wong's claimed authority falls on the duty-performance side of that line. It does not give him the right to the office itself.

176. *Denison* confirms the same principle in the appointment context. There, the court held that a rejected Highway Commission appointee had no continuing right to serve. *Denison*, 61 S.W.2d at 1021. The court explained that the

rejected appointee had no "right whatever to occupy the office or to discharge, after such rejection, any of the duties thereof." *Id.*

177. So even when a defective source of authority may create an appearance of authority, it does not create legal title. A person may appear to act as an officer without being the lawful officer. That is the point of the *de facto* doctrine. It protects reliance. It does not confer title.

178. Nor can *de facto* status defeat this quo warranto proceeding. The doctrine protects the public, not the person claiming the office. As *Martin* explains, "the legal doctrine as to *de facto* officers rests upon the principle of protection to the interests of the public and third parties, and not on the rights of rival claimants." *Martin v. Grandview Indep. Sch. Dist.*, 266 S.W. 607, 609–10 (Tex. Civ. App.—Waco 1924, writ ref'd).

179. *Martin* also explains the consequence. A *de facto* officer remains "subject to removal by direct action," can "claim no personal benefit or indemnity out of his incumbency," and has his acts protected only until "his title to such office is adjudged insufficient." *Id.*

180. This case is that direct action. Quo warranto is available when a person "usurps, intrudes into, or unlawfully holds or executes" an office. Tex. Civ. Prac. & Rem. Code § 66.001(1). Wong therefore cannot avoid adjudication of title by invoking a doctrine that applies only when title has not yet been adjudicated.

181. That leaves Wong with no holdover theory. Holdover status is *de jure* status. It belongs to a lawful officer who continues to perform duties until a successor is duly qualified. Tex. Const. art. XVI, § 17(a). *De facto* status is different. It may protect the public's reliance on Wong's past acts. It cannot make him the lawful Fort Bend County Judge.

182. Wong therefore cannot use *de facto* status to become a constitutional holdover. It cannot make him George's successor. It cannot give him legal title to the office. And it cannot give him a continuing right to exercise the office after the only order he relies on was void or, at minimum, expired with the Roberts nonsuit.

183. Simply put, Wong cannot hold over from an office he never lawfully held.

XII. ATTACHMENT OF INFORMATION

184. A true and correct copy of the information sought to be filed by the State in this cause is attached and marked as Exhibit 1.

CONCLUSION AND PRAYER

The State has pleaded probable grounds for this quo warranto proceeding. Because the information states a statutory quo warranto claim and no facial legal defect bars filing, probable ground exists. Tex. Civ. Prac. & Rem. Code § 66.002(d); *Annunciation House, Inc.*, 719 S.W.3d at 580–82.

Accordingly, the State respectfully requests that the Court: (1) find that probable ground exists for this proceeding; (2) grant the State leave to file the attached Information in the Nature of Quo Warranto; (3) order the information filed in the name of the State of Texas; (4) order citation and process issued to Wong; (5) enter the proposed order submitted with this Petition; and (6) grant all further relief to which the State is justly entitled.

Respectfully submitted,
Bridgette Smith-Lawson
Fort Bend County Attorney

By: /s/ Kevin T. Hedges

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ATTORNEYS FOR PLAINTIFF
THE STATE OF TEXAS

CERTIFICATE OF SERVICE

I certify that on July 6, 2026, a true and correct copy of the foregoing instrument was served on all parties/counsel identified on the attached Service List in accordance with Texas Rules of Civil Procedure 21 and 21a, by electronic service through the electronic filing manager to each recipient's e-service address on file with the manager and, where service through the electronic filing manager was not available, by e-mail to the address shown on the Service List below.

/s/ Kevin T. Hedges

Kevin T. Hedges

SERVICE LIST

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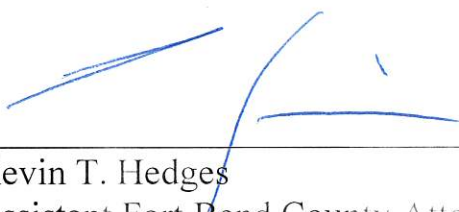
STATE OF TEXAS §
 §
COUNTY OF FORT BEND §

VERIFICATION

Before me, the undersigned notary public, on this day personally appeared Kevin T. Hedges, Assistant Fort Bend County Attorney, who after being duly sworn, stated under oath as follows:

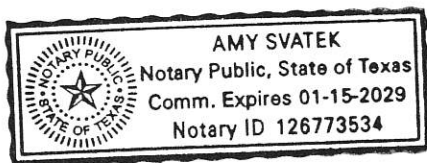
"My name is Kevin T. Hedges. I am over eighteen years of age, of sound mind, and capable of making this verification. I am an Assistant Fort Bend County Attorney, and I make this verification in my official capacity on behalf of the State of Texas.

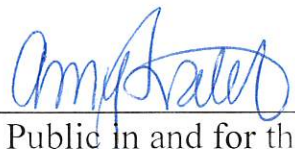
I have read the Petition for Leave to File an Information in the Nature of Quo Warranto. The factual allegations set forth in the Petition are true and correct, based on my personal knowledge, including knowledge obtained through my official duties and review of official record."



Kevin T. Hedges
Assistant Fort Bend County Attorney

SUBSCRIBED and SWORN to before me on this 6th day of July, 2026, to certify which, witness my hand and official seal.





Notary Public in and for the State of Texas

Exhibit 1

Information in the Nature of Quo Warranto

NO. _____

THE STATE OF TEXAS,	§	IN THE DISTRICT COURT OF
<i>Plaintiff,</i>	§	
	§	
v.	§	FORT BEND COUNTY, TEXAS
	§	
DANIEL WONG,	§	
<i>Defendant.</i>	§	_____ JUDICIAL DISTRICT

INFORMATION IN THE NATURE OF QUO WARRANTO

To the Honorable Court:

This case concerns legal title to public office. Daniel Wong is exercising the powers of Fort Bend County Judge. Nothing gives him that authority. Texas law governing this matter is settled. Wong's claim to the office of Fort Bend County Judge depends entirely on the April 10 order. That order is void as the court that issued it did not have jurisdiction. And even if the April 10 order ever had legal effect, any authority it conferred died when the underlying case was non-suited. The State of Texas, acting through the Fort Bend County Attorney, therefore files this information in the nature of quo warranto, respectfully showing as follows:

PRELIMINARY STATEMENT

Wong is exercising the powers of Fort Bend County Judge. But what gives him that authority? Wong's claim depends on one document: the April 10, 2026 order in the Roberts ouster case. (Ex. E). But that order is void and gives him no title at all.

The order is void because the Roberts case was prosecuted by a private citizen alone — not by the State. (Exs. A–G). A qualified resident may start the Chapter 87 process, but only the State can maintain an ouster suit. *Compare* Tex. Loc. Gov't Code § 87.015(b), *with id.* § 87.018(b), (f). The Supreme Court of Texas has made the point directly: "Individual citizens . . . have no right to maintain an ouster suit without being joined by a proper state official." *In re Wolfe*, 341 S.W.3d 932, 932 (Tex. 2011) (per curiam) (quoting *Garcia v. Laughlin*, 285 S.W.2d 191, 194 (Tex. 1955)). "Without joinder of the proper state official," the court lacks subject-matter jurisdiction "to hear and determine the cause." *Id.*

Orders entered without jurisdiction are void, not merely voidable. *In re K.N.*, No. 24-0881, 2026 WL 1614378, at *6 (Tex. June 5, 2026) (slip op.; mandate not yet issued); *In re Panchakarla*, 602 S.W.3d 536, 539 (Tex. 2020) (per curiam); *Mapco, Inc. v. Forrest*, 795 S.W.2d 700, 703 (Tex. 1990). And a void order is "entirely null within itself," is "not susceptible of ratification or confirmation," and its nullity "cannot be waived." *Easterline v. Bean*, 49 S.W.2d 427, 429 (Tex. 1932); *Slaughter v. Qualls*, 162 S.W.2d 671, 674 (Tex. 1942) (explaining that an act that is a "mere nullity," "passing no title and conferring no rights whatsoever," is "absolutely void"). The April 10 order therefore gave Wong nothing — no appointment, no authority, and no legal title to act as county judge. (Ex. E).

The result is the same even if the April 10 order was valid when signed. On June 17, 2026, Roberts nonsuited "all claims for relief and the entire case," effective immediately. (Ex. F). The court granted the nonsuit with prejudice that same day. (Ex. G). Once the Chapter 87 case ended, any temporary appointment ended with it. Indeed, a nonsuit can vitiate interlocutory orders and render them moot. *Villafani v. Trejo*, 251 S.W.3d 466, 469 (Tex. 2008). And when a case supporting a temporary injunction is nonsuited, "the temporary injunction cease[s] to exist." *Gen. Land Office v. OXY U.S.A., Inc.*, 789 S.W.2d 569, 571 (Tex. 1990). Put simply, a temporary Chapter 87 order cannot outlive the case that created it.

The holdover clause does not rescue Wong's claimed title. *See* Tex. Const. art. XVI, § 17. The clause keeps a lawful officer in place until a successor is duly qualified. *Id.* It does not transform a void order into title to public office. And even if valid, the April 10 order did not give Wong title. Section 87.017(a) authorizes a temporary appointee only to "perform the duties of the office." It does not authorize him to "hold" the office. *Compare* Tex. Loc. Gov't Code § 87.017(a) (authorizing a temporary appointee only to "perform the duties of the office"), *with id.* § 87.041(c) (providing that a vacancy appointee "shall hold office until the next general election"). Wong's contrary reading would exceed the holdover clause's limited purpose and produce two absurd results:

- First, a temporary Chapter 87 appointee could turn a void order – or, at most, an order that ended with the nonsuit – into constitutional title to public office.
- Second, Fort Bend County would have two persons claiming one office: George, the elected County Judge, who remains the officeholder until December 31, 2026, despite his suspension pending criminal appeal (Ex. K); and Wong, whose only claimed entitlement comes from a void Chapter 87 order that, if ever operative, ended when Roberts nonsuited her ouster.

But the holdover clause presupposes lawful officeholding — it does not create lawful officeholding. *See Ex parte Sanders*, 215 S.W.2d 325, 326–27 (Tex. 1948) (explaining lawful officeholding is a prerequisite to holdover status). Nor does it allow two people to hold the same office of county judge at the same time. Tex. Const. art. V, § 15 (providing that there shall be "a County Judge" for each county).

These facts create the very problem quo warranto exists to resolve. Wong continues to claim title to the office of Fort Bend County Judge and to exercise its powers under an order that is void — or at least no longer operative. That claim cannot be left unresolved. The State of Texas, acting through the Fort Bend County Attorney, therefore files this Information in the Nature of Quo Warranto so a court can answer the simple question this case presents: Can a temporary Chapter 87 appointee hold the office of County Judge at the same time as the elected officeholder when his only claim to title rests on a void – or expired – order? The answer is "no."

JUDICIAL NOTICE AND INCORPORATION

Under Texas Rule of Evidence 201, the State requests that the Court take judicial notice of the pleadings, filings, orders, judgments, and procedural status reflected in the following matters:

(a) **Roberts's Ouster.** Cause No. 25–DCV–335003; *Sarah L. Roberts v. KP George in his official capacity as County Judge of Fort Bend County, Texas*; In the 400th Judicial District Court of Fort Bend County, Texas.

(b) **Misdemeanor Charge.** Cause No. 24–CCR–241836; *The State of Texas v. Kyle Prasad George*; In the Fort Bend County Court at Law No. 5. (Texas Election Code § 255.005(a)).

(c) **First Money Laundering Count.** Cause No. 25–DCR–110888A; *The State of Texas v. Kyle Prasad George*; In the 458th Judicial District Court of Fort Bend County, Texas. (Tex. Penal Code § 34.02(e)(2)).

(d) **Second Money Laundering Count.** Cause No. 25–DCR–110889A; *The State of Texas v. Kyle Prasad George*; In the 458th Judicial District Court of Fort Bend County, Texas. (Tex. Penal Code § 34.02(e)(2)).

(e) **Appeal from First Money Laundering Count.** Cause No. 14–26–00621–CR; *Kyle Prasad George v. The State of Texas*; In the Fourteenth Court of Appeals.

(f) **Appeal from Second Money Laundering Count.** Cause No. 14–26–00622–CR; *Kyle Prasad George v. The State of Texas*; In the Fourteenth Court of Appeals.

Under Texas Rules of Civil Procedure 58 and 59, the State also incorporates by reference the pleadings, filings, orders, judgments, and other court records from these proceedings that are referenced in this Information.

I.
REQUEST FOR EXPEDITED SCHEDULE

1. The State requests a tailored Level 3 discovery-control plan and expedited schedule under Rule 190.4.

2. This case presents a legal question that should be resolved promptly: whether Wong has legal title or authority to hold or execute the office of Fort Bend County Judge.

3. The State therefore requests:

a. immediate issuance of citation and process under Texas Rule of Civil Procedure 780;

b. a prompt hearing on the State's application for temporary restraining order;

c. a prompt temporary-injunction hearing;

d. an expedited schedule for dispositive briefing; and

e. the earliest practicable trial setting, if trial is necessary.

4. All conditions precedent to the State's right to bring this proceeding have occurred, have been performed, or have been waived.

II.
STATEMENT OF RELIEF

5. The State seeks non-monetary quo warranto relief under Texas Civil Practice and Remedies Code § 66.003(1).

6. The State asks the Court to enter judgment that Wong has no legal right to hold or execute the office of Fort Bend County Judge and that Wong be removed

from any claimed right to hold or execute that office. Tex. Civ. Prac. & Rem. Code §§ 66.001(1), 66.003(1); Tex. R. Civ. P. 781.

7. The State does not seek a fine or costs under Texas Civil Practice and Remedies Code §§ 66.003(2) or 66.003(3).

8. To the extent Texas Rule of Civil Procedure 47 applies, the State seeks only non-monetary relief within this Court's jurisdictional limits. Tex. R. Civ. P. 47(b), (c)(5).

9. The State also seeks injunctive relief to preserve the public's interest in lawful county government pending final judgment.

III. PARTIES AND SERVICE

10. Plaintiff is the State of Texas. The State appears by and through Bridgette Smith-Lawson, Fort Bend County Attorney.

11. The county attorney of the proper county may petition the district court of the proper county for leave to file an information in the nature of quo warranto. Tex. Civ. Prac. & Rem. Code § 66.002(a).

12. This Information is brought in the name of the State of Texas, as Chapter 66 requires. Tex. Civ. Prac. & Rem. Code § 66.002(b).

13. The Fort Bend County Attorney brings this proceeding on the County Attorney's own motion. Tex. Civ. Prac. & Rem. Code § 66.002(c).

14. The Fort Bend County Attorney has authority to represent the State in this quo warranto proceeding. *See* Tex. Const. art. V, § 21; Tex. Gov't Code § 45.179(f); Tex. Gov't Code § 43.181(d).

15. Defendant is Daniel Wong. Wong purports to hold or execute the office of Fort Bend County Judge and is currently exercising the powers and duties of that office.

16. Wong may be served with citation through his counsel, Christopher D. Hilton, Stone Hilton PLLC, 600 Congress Avenue, Suite 2350, Austin, Texas 78701, or wherever Wong may be found. Tex. Civ. Prac. & Rem. Code § 66.002(d); Tex. R. Civ. P. 780.

IV. JURISDICTION AND VENUE

17. This Court has subject-matter jurisdiction over this quo warranto proceeding.

18. Chapter 66 authorizes this proceeding because Wong is alleged to be usurping, intruding into, or unlawfully holding or executing a public office. Tex. Civ. Prac. & Rem. Code § 66.001(1).

19. Texas district courts have original jurisdiction over actions, proceedings, and remedies except where jurisdiction has been conferred exclusively on another court, tribunal, or administrative body. Tex. Const. art. V, § 8; Tex. Gov't Code § 24.007(a).

20. Fort Bend County is the proper county under § 66.002(a). Wong claims to hold or execute the office of Fort Bend County Judge in Fort Bend County. The office at issue is a Fort Bend County office. The alleged unlawful holding or execution of that office is occurring in Fort Bend County.

21. Venue is proper in Fort Bend County. To the extent the general venue rule applies, all or a substantial part of the events or omissions giving rise to this proceeding occurred in Fort Bend County. Tex. Civ. Prac. & Rem. Code § 15.002(a)(1).

**V.
STANDING / AUTHORITY TO PROSECUTE**

22. The Fort Bend County Attorney has authority to bring this proceeding. The Texas Constitution provides that county attorneys represent the State in district and inferior courts in their respective counties, subject to legislative allocation of duties where a district attorney exists. *See* Tex. Const. art. V, § 21.

23. The Legislature has specifically assigned the Fort Bend County Attorney all powers, duties, and privileges in Fort Bend County relating to quo warranto proceedings, except as provided by Texas Government Code § 43.181(d). Tex. Gov't Code § 45.179(f).

24. Section 43.181(d) confirms that the Fort Bend County District Attorney has no power, duty, or privilege in Fort Bend County relating to quo warranto

proceedings unless the County Attorney fails or refuses to act. Tex. Gov't Code § 43.181(d).

25. The Fort Bend County Attorney files this Information on the County Attorney's own motion under § 66.002(c), and not at the request of an individual relator. *See* Tex. Civ. Prac. & Rem. Code § 66.002(c). Accordingly, no private relator is named.

26. The State of Texas is the plaintiff in this proceeding, and the County Attorney is the authorized public officer through whom the State acts. *Id.* §§ 66.002(b), (c).

VI. PUBLIC OFFICE AT ISSUE

27. The office at issue is the office of County Judge of Fort Bend County, Texas.

28. The County Judge is a constitutional county officer. The Texas Constitution establishes a county court in each county and provides that a County Judge shall be elected in each county by the qualified voters, shall be well informed in the law of the State, shall be a conservator of the peace, and shall hold office for four years and until a successor is elected and qualified. Tex. Const. art. V, § 15.

29. The County Judge is also a member and presiding officer of the county commissioners court. The Texas Constitution provides that the County Judge, as presiding officer, and the county commissioners compose the county commissioners

court, which exercises the powers and jurisdiction over county business conferred by the Constitution and laws of this State. Tex. Const. art. V, § 18(b). The Local Government Code likewise provides that the members of the commissioners court are the county judge and county commissioners, and that the county judge, if present, is the presiding officer of the commissioners court. Tex. Loc. Gov't Code § 81.001(a)–(b).

30. The office of County Judge of Fort Bend County is therefore a public county office within the meaning of Chapter 66 of the Texas Civil Practice and Remedies Code.

31. Chapter 66 authorizes quo warranto when a person usurps, intrudes into, or unlawfully holds or executes an office. Tex. Civ. Prac. & Rem. Code § 66.001(1).

32. Wong claims to be the Fort Bend County Judge. In that claimed capacity, Wong purports to exercise the powers, duties, privileges, and authority of that office, including presiding over the Fort Bend County Commissioners Court and participating in the transaction of Fort Bend County business.

33. Because Wong claims the right to hold and execute the office of County Judge of Fort Bend County, Texas, his legal right to hold or execute that office is properly tested in a quo warranto proceeding brought in the name of the State of Texas. *See* Tex. Civ. Prac. & Rem. Code §§ 66.001(1), 66.002(b).

VII. FACTUAL GROUNDS FOR PROCEEDING

34. The factual sequence that created this dispute begins with the election that placed George in office.

A. George was elected Fort Bend County Judge in 2018, reelected in 2022, and remains the legal incumbent unless a lawful vacancy occurs.

35. George was elected Fort Bend County Judge in 2018. He was reelected in 2022 to a term that runs through December 31, 2026.¹

36. George is currently suspended without pay. But suspension is not removal. Unless and until George is lawfully removed, resigns, dies, or another vacancy-creating event occurs, he remains the duly elected Fort Bend County Judge.² (Ex. K).

37. Texas law has long drawn that line. A suspension may prevent an officer from presently exercising the powers of the office and receiving its compensation. But it does not divest the officer of title to the office, and it does not make the office vacant. The Supreme Court of Texas made the point more than a century ago: "Still a suspension is in no proper sense the same thing as a removal. We are not at liberty by construction or otherwise to hold that the provisions of the Constitution with regard to removals apply equally to suspensions from office."

¹ See https://ballotpedia.org/KP_George

² See *id.*

Griner v. Thomas, 104 S.W. 1058, 1059 (Tex. 1907) (quoting *Poe v. State*, 72 Tex. 625, 10 S.W. 737, 740 (1889)).

38. That distinction controls here. George's suspension did not remove him or vacate the office. The office remains occupied. *See id.* And because the office is not vacant, no one may be appointed under the vacancy-filling statutes to replace George, assume his title, or hold himself out as the Fort Bend County Judge. *See id.*

39. The relevant appointment power confirms this. The Commissioners Court has a vacancy-filling power — not a power to replace a suspended incumbent. The Texas Constitution provides that "[a] ***vacancy*** in the office of County Judge . . . shall be filled by the Commissioners Court." Tex. Const. art. V, § 28(b) (emphasis added). Likewise, Chapter 87 provides that "[t]he commissioners court of a county may fill a ***vacancy***" in certain county offices. Tex. Loc. Gov't Code § 87.041(a)(1). Both provisions require the same predicate — an actual vacancy.

40. The Supreme Court of Texas has enforced that requirement in a similar context. In *State ex rel. Angelini v. Hardberger*, the Court held that a judge's future-dated resignation did not create a present vacancy and, therefore, that the Governor lacked power to appoint a successor until the office actually became vacant. 932 S.W.2d 489, 491–95 (Tex. 1996). The Court later reaffirmed that rule in *In re Dallas County*, explaining that "the vacancy occurs on the date the justice actually leaves office or, in this case, the date the office is actually created, regardless of

forewarning." 697 S.W.3d 142, 164–65 (Tex. 2024) (orig. proceeding). Thus, appointment authority arises only when the office is actually vacant. It does not arise because of a suspension. *See id.*; *Hardberger*, 932 S.W.2d at 491–95.

41. The Attorney General has applied the same rule to suspended officers. In an analogous opinion, the Attorney General explained that "[t]he suspension of the elected prosecutor does not create a vacancy in his office; it prevents him from performing its duties pending final resolution" of the underlying proceeding. Tex. Att'y Gen. Op. No. MW–404, at 2 (1981).

42. So unless and until George is lawfully removed or otherwise vacates the office, the office is not vacant. And unless the office is vacant, no vacancy-filling appointment may be used to install a successor. George remains the Fort Bend County Judge through the end of his term unless a lawful vacancy occurs before then.

B. During George's second term, the State charged him with one misdemeanor and later indicted him on two felony counts.

43. During his second term, George became the subject of three criminal charges. The first was a misdemeanor. In 2024, before the criminal court suspended him, the State charged George in *State of Texas v. George*, No. 24–CCR–241836, with misrepresentation of identity under Texas Election Code § 255.005. (Ex. H).

44. The misdemeanor charging instrument alleges that George misrepresented his identity in a campaign communication by posing as Facebook

user "Antonio Scalywag" on George's own Facebook page. It further alleges that George did so "with intent to injure a candidate or influence the result of an election." (Ex. H).

45. The next year, the State brought two felony charges. In early 2025, George was indicted in *State of Texas v. George*, Nos. 25–DCR–110888A and 25–DCR–110889A, on two counts of money laundering under Texas Penal Code § 34.02(e)(2). (Exs. I–J).

C. After Roberts criticized George during public comment, George cut off her remarks and had her removed from the podium.

46. While the criminal charges against George were pending, the Fort Bend County Commissioners Court met on July 8, 2025. Roberts appeared at that meeting and addressed the Court during public comment.³

47. Roberts's comments concerned George. She criticized him and referred to his "multiple felony indictments."⁴

48. George then stopped Roberts from continuing. He interrupted her, instructed her to stop speaking, and turned off her microphone.⁵

³ See <https://fortbendcountytexas.new.swagit.com/videos/349053> at 57:59–59:47.

⁴ See *id.* at 58:50–59:06.

⁵ See *id.* at 59:08–59:47.

49. George also directed a sheriff's deputy to remove Roberts from the podium. The deputy then escorted Roberts away from the podium.⁶

D. Roberts prosecuted a private removal case against George; the State was not joined, and the proper state official did not appear for the State.

50. After George removed Roberts from the July 8, 2025 Commissioners Court meeting, Roberts filed a Chapter 87 removal proceeding against him in *Roberts v. George*, No. 25–DCV–335003. (Exs. A–G).

51. Roberts filed that proceeding after July 8, 2025. So the amended version of Chapter 87 governed her petition. *See* Act of June 20, 2025, 89th Leg., R.S., ch. 601, §§ 5–6; Tex. Loc. Gov't Code § 87.018(f).

52. Under Chapter 87, a qualified resident may file a removal petition. Tex. Loc. Gov't Code § 87.015(b). But filing a petition is not the same thing as maintaining and prosecuting the State's ouster remedy. Texas law draws that line clearly.

53. A Chapter 87 removal proceeding must be conducted "in the name of the State of Texas, and on the relation of the person filing the petition." Tex. Loc. Gov't Code § 87.018(b). And for petitions governed by the amended statute, the State's representative is not the private relator and not the county attorney. It is the

⁶ *See id.*

prosecuting attorney appointed by the presiding judge of the administrative judicial region. *Id.* § 87.018(f).

54. Section 87.018(f) provides that, "[i]n a proceeding to remove an officer under this subchapter," the presiding judge "shall appoint a prosecuting attorney from another judicial district or county, as applicable, in the administrative judicial region to represent the state." *Id.* § 87.018(f). Chapter 87 defines "prosecuting attorney" as "a district attorney or a county attorney with criminal jurisdiction." *Id.* § 87.011(5).

55. Nor could the Fort Bend County Attorney fill that role by simply appearing in the case. The Legislature repealed the former provisions that assigned ordinary Chapter 87 representation to the county attorney or district attorney in certain cases. *See* Act of June 20, 2025, 89th Leg., R.S., ch. 601, § 4. The amended statute instead required appointment of a prosecuting attorney from another judicial district or county. Tex. Loc. Gov't Code § 87.018(f). The Fort Bend County Attorney therefore was not the Chapter 87 official authorized to represent the State in Roberts's ouster.

56. The record does not show that the State was joined through any prosecuting attorney appointed under § 87.018(f). (Exs. A–G). It does not show an appointment order by the presiding judge. *Id.* It does not show an appearance by

any appointed prosecuting attorney for the State. *Id.* And it does not show that any such official prosecuted the case. *Id.*

57. That defect is jurisdictional. The Supreme Court of Texas has long held that private citizens have "no right to maintain an ouster suit without being joined by a proper state official." *In re Wolfe*, 341 S.W.3d at 932 (quoting *Garcia*, 285 S.W.2d at 194). "Without joinder of the proper state official," the court lacks subject-matter jurisdiction "to hear and determine the cause." *Id.* The reason is basic: "[i]n order that the district judge and the district court may have jurisdiction to hear and determine the cause," the parties bringing the action must have "legal capacity to institute and maintain the suit." *Garcia*, 285 S.W.2d at 194.

58. Because Roberts maintained the removal proceeding without the State and without the appointed § 87.018(f) prosecuting attorney, the court lacked jurisdiction to enter any ouster order against George. Any such order is void. *See In re K.N.*, No. 24-0881, 2026 WL 1614378, at *6 ("But when a court lacks genuine subject-matter jurisdiction, its orders are void, not merely voidable"); *In re Panchakarla*, 602 S.W.3d at 539; *PNS Stores, Inc. v. Rivera*, 379 S.W.3d 267, 272 (Tex. 2012) ("We have described a judgment as void when 'the court rendering judgment had no jurisdiction of the parties or property, no jurisdiction of the subject matter, ...'" (quoting *Travelers Ins. Co. v. Joachim*, 315 S.W.3d 860, 862–63 (Tex. 2010))).

59. The defect also could not be waived or insulated from collateral attack. A void judgment may be attacked directly or collaterally. *Rivera*, 379 S.W.3d at 271–72. And "[s]ubject-matter jurisdiction cannot be waived, and can be raised at any time." *Alfonso v. Skadden*, 251 S.W.3d 52, 55 (Tex. 2008) (per curiam).

60. The result is straightforward: Roberts could file a Chapter 87 petition if she satisfied § 87.015(b). But she could not carry the State's removal remedy to judgment by herself.

E. The April 10 order is void; in any event, it only purports to authorize Wong to perform duties during George's temporary suspension.

61. Despite the absence of the State and the absence of any proper state official, the court signed an order in the Roberts removal case on April 10, 2026. (Ex. E).

62. The April 10 order did not remove George from office. It purported to temporarily suspend him as Fort Bend County Judge. It also purported to appoint Wong "as county judge to perform the duties of the office under Texas Local Government Code § 87.017" during that temporary suspension. The order further required Wong to execute a \$50,000 bond under § 87.017(b). (Ex. E).

63. Because the State was not joined in Roberts's removal case, and because the case was not maintained or prosecuted through a proper state official, the court lacked jurisdiction to enter the April 10 order. *See In re Wolfe*, 341 S.W.3d at 932. For that reason alone, the order is void. A void order cannot suspend an elected

county judge, create a vacancy, or transfer legal title to public office. *See Rivera*, 379 S.W.3d at 272; *Joachim*, 315 S.W.3d at 862–63.

64. But even if the April 10 order were valid, it would not establish that Wong holds the office of Fort Bend County Judge. The order invokes § 87.017. That statute is a temporary-duty statute. It is not a removal statute. It is not a vacancy-filling statute. And it is not a title-conferring statute.

65. Section 87.017 is titled "Suspension Pending Trial; Temporary Appointee." Tex. Loc. Gov't Code § 87.017. Its text authorizes a district judge, after citation issues, to "temporarily suspend the officer" and to "appoint another person to perform the duties of the office." *Id.* § 87.017(a). That language does two limited things: it temporarily suspends the elected officer's ability to perform the office's duties, and it allows another person to perform those duties while the removal case remains pending.

66. Section 87.017 does not say that the temporary appointee "holds" the office. It does not say that the temporary appointee fills a vacancy. It does not say that the temporary appointee serves a term. It says only that the temporary appointee may "perform the duties of the office." *Id.*

67. The bond requirement confirms the point. Section 87.017(b) requires the temporary appointee to execute a bond before the officer may be suspended. *Id.* § 87.017(b). That bond protects the suspended officer if the grounds for removal are

later found at trial to be insufficient or untrue. *Id.* And if the final judgment establishes the officer's right to the office, the county must pay the officer an amount equal to the compensation received by the temporary appointee. *Id.* § 87.017(c).

68. Those provisions assume the elected officer may still have the legal right to the office. They assume the officer may win the removal case. And they treat the § 87.017 appointee as a temporary substitute who performs duties during the case — not as a successor who acquires title to the office.

69. Removal requires more. Chapter 87 provides that "[o]fficers may be removed only following a trial by jury." Tex. Loc. Gov't Code § 87.018(a). Until a final removal judgment, there is no removal. And without removal or some other vacancy-creating event, there is no vacancy to fill.

70. Chapter 87 uses different language when it addresses an actual vacancy. Section 87.041 provides that the Commissioners Court may "fill a vacancy" in the office of county judge, and that the person appointed to fill such a vacancy "shall **hold** office until the next general election." *Id.* § 87.041(a)(1), (c) (emphasis added). Section 87.017 contains no comparable "hold office" language. *Compare id.* § 87.017(a), *with id.* § 87.041(a)(1), (c).

71. The difference matters. Section 87.041 concerns legal title to a vacant office. Section 87.017 concerns only the temporary performance of duties while a

removal case is pending. One fills a vacancy. The other does not. One says the appointee "shall hold office." The other does not.

72. The Texas Ethics Commission has drawn the same distinction under § 87.017. In Advisory Opinion No. 196, the Commission explained that a person appointed under § 87.017 has "the right and duty to perform the duties" of the office during the pendency of the removal trial, but "is not" the officeholder and does not "hold" the office. Tex. Ethics Comm'n Op. No. 196 (1994).

73. The April 10 order tracks § 87.017's limited framework. It does not state that Wong was appointed to fill a vacancy. It does not identify any vacancy. It does not appoint Wong under § 87.041. It does not set a term of office. And it does not state that Wong "holds" the office of Fort Bend County Judge. (Ex. E).

74. At most, the April 10 order purports to appoint Wong under § 87.017 to perform the duties of the office while George is temporarily suspended. (Ex. E). It gives Wong no legal title to the office. It does not make Wong the Fort Bend County Judge. And it cannot convert a temporary-duty appointment into a vacancy-filling appointment.

75. Thus, the April 10 order fails twice. First, it is void because the court lacked jurisdiction to enter it. Second, even if it were valid, it would authorize only a temporary appointee to perform duties during George's temporary suspension. It would not establish that Wong holds the office of Fort Bend County Judge.

F. After George appealed his felony convictions, the criminal court suspended him without pay pending appeal; it did not declare the office vacant.

76. On June 16, 2026, the 458th Judicial District Court signed two judgments of conviction against George in *State v. George*, Nos. 25–DCR–110888A and 25–DCR–110889A. (Exs. L–M).

77. Each judgment reflects a jury conviction for money laundering of \$30,000 or more but less than \$150,000 under Texas Penal Code § 34.02(e)(2), a third-degree felony. (Exs. L–M).

78. George appealed both judgments that same day. His notices of appeal state that he appealed the final judgments and sentences to the First Court of Appeals or the Fourteenth Court of Appeals in Houston. (Exs. N–O).

79. The same day, the criminal court signed a separate suspension order under Texas Local Government Code § 87.032. (Ex. K).

80. Section 87.032 addresses the effect of an appeal. It provides that, when an officer appeals, the appeal supersedes an order of removal unless the court finds that the public interest requires suspension pending appeal. Tex. Loc. Gov't Code § 87.032. If the court makes that finding, it "shall suspend the officer as provided by this chapter." *Id.*

81. The June 16 order made only that finding. It states that the court conducted a hearing, received evidence and argument, and found that "it is in the

public interest to suspend Defendant, Kyle Prasad George, without pay, pending his appeal from felony convictions in the above-styled causes." (Ex. K).

82. The order is limited on its face. It suspends George without pay pending appeal. It does not declare the office vacant. (Ex. K).

83. The order also does not declare the office vacant. It does not direct that a vacancy be filled. It does not identify a successor. And it does not state that any person other than George holds the office of Fort Bend County Judge. (Ex. K).

84. Nor does the order incorporate the April 10 order from the Roberts removal case. It does not cite that order, modify it, extend it, revive it, ratify it, or state that Wong holds office by virtue of that earlier temporary appointment. (*Compare* Ex. E *with* Ex. K).

85. Thus, the criminal court's June 16 order did one thing: it suspended George without pay while his appeals are pending. It did not remove George from office. It did not create a vacancy.

G. Roberts nonsuited the removal case, ending any § 87.017 authority the April 10 order purported to confer.

86. The April 10 order was void for the reasons stated above. The State was not joined in the Roberts removal case, and the case was not maintained or prosecuted through a proper state official. (Exs. A–G). The court therefore lacked jurisdiction to enter any order suspending George or appointing Wong.

87. But even if the April 10 order had been valid when signed, it did not survive the case that supplied it. Section 87.017 authorizes only temporary relief in a pending removal proceeding. Once that proceeding ended, any temporary appointment under § 87.017 ended with it.

88. That is what happened here. On June 17, 2026, Roberts filed a notice of nonsuit in *Roberts v. George*, No. 25–DCV–335003. (Ex. F).

89. The notice was broad. Roberts nonsuited "all claims for relief and the entire case" against George. The nonsuit was effective immediately on filing. (Ex. F).

90. The court then signed an order the same day granting the nonsuit and dismissing the removal case with prejudice. (Ex. G).

91. A nonsuit has immediate legal effect. It "extinguishes a case or controversy from 'the moment the motion is filed'" and "renders the merits of the nonsuited case moot." *Univ. of Tex. Med. Branch at Galveston v. Estate of Blackmon ex rel. Shultz*, 195 S.W.3d 98, 100 (Tex. 2006) (per curiam) (quoting *Shadowbrook Apts. v. Abu-Ahmad*, 783 S.W.2d 210, 211 (Tex. 1990) (per curiam)). It can also "vitate certain interlocutory orders, rendering them moot and unappealable." *Villafani*, 251 S.W.3d at 469.

92. The same applies to temporary relief. In *General Land Office*, the Supreme Court of Texas held that, after nonsuit of the underlying case, "the

temporary injunction ceased to exist and the appeal became moot." 789 S.W.2d at 571. The Court further explained that no separate dissolution order was required because, "when the underlying action was dismissed, the temporary injunction dissolved automatically." *Id.*

93. The April 10 order was, at most, temporary relief tied to the Roberts removal case. It purported to appoint Wong under § 87.017 "to perform the duties of the office" while George was temporarily suspended during that case. (Ex. E). It did not fill a vacancy. It did not appoint Wong to a term. And it did not give Wong legal title to the office.

94. So when Roberts nonsuited the entire removal case, there was no pending Chapter 87 proceeding left to support a temporary § 87.017 appointment. The statutory predicate disappeared. The temporary appointment – if it ever had legal effect – ended with the case.

95. The result is unavoidable. After June 17, 2026, Wong could not rely on the April 10 order as authority to act as Fort Bend County Judge. The order was void from the start. And even if it were not void, it expired when Roberts nonsuited the removal case.

H. No current order or statute gives Wong legal title to the office of Fort Bend County Judge or authority to perform its duties.

96. Taken together, these events leave Wong with no present legal claim to the office of Fort Bend County Judge. No current order gives him title to the office.

No current order authorizes him to perform its duties. And no statute automatically installs him in George's place.

97. The April 10 order does not supply that authority. (Ex. E). As explained above, that order is void because the court lacked jurisdiction over Roberts's privately maintained removal case. The State was not joined. No proper state official appeared for the State. And without the State's joinder through the proper official, the court had no jurisdiction to suspend George, appoint Wong, or enter any order affecting legal title to the office. *See In re Wolfe*, 341 S.W.3d at 932.

98. A void order has no legal effect. It cannot suspend an elected county judge. It cannot appoint a temporary substitute. It cannot create a vacancy. And it cannot give Wong any right to hold himself out as Fort Bend County Judge.

99. The April 10 order fails for another reason. Even if it had been valid when signed, it was temporary by its own terms and by the statute it invoked. Section 87.017 authorizes a district judge to temporarily suspend an officer and appoint another person "to perform the duties of the office" while the removal case is pending. Tex. Loc. Gov't Code § 87.017(a). It does not remove the officer. It does not fill a vacancy. And it does not give the temporary appointee legal title to the office.

100. Roberts then nonsuited the entire removal case. (Ex. F). The court dismissed it with prejudice. (Ex. G). Once that case ended, there was no pending

Chapter 87 proceeding left to support any temporary appointment under § 87.017. So even if the April 10 order had once supplied temporary authority, that authority ended no later than June 17, 2026.

101. George's current suspension does not change the result. The criminal court's June 16 order suspended George without pay pending appeal. (Ex. K). It did not declare the office vacant. And it did not state that anyone other than George holds the office of Fort Bend County Judge. (Ex. K).

102. Nor did the June 16 order revive or extend the April 10 order. It did not cite the April 10 order. It did not incorporate it. It did not ratify it. And it did not convert Wong's former temporary-duty appointment – if it ever had legal effect – into legal title to the office. (*Compare* Ex. E *with* Ex. K).

103. Suspension is not removal. George therefore remains the legal incumbent unless and until he is lawfully removed, his term expires, or another vacancy-creating event occurs. Until then, the office is occupied. It is not vacant.

104. If a lawful vacancy later occurs, the replacement process would begin then — not before. For the office of county judge, an actual vacancy is filled by the Commissioners Court. Tex. Const. art. V, § 28(b); Tex. Loc. Gov't Code § 87.041(a)(1). That vacancy-filling power does not arise unless the office is actually vacant.

105. Wong therefore has no current source of authority. The April 10 order was void. At a minimum, it expired when Roberts nonsuited the removal case. The June 16 suspension order did not declare a vacancy. And the vacancy-filling statutes do not apply because George has not been lawfully removed and the office is not vacant.

106. Wong accordingly has no present right to hold the office of Fort Bend County Judge, assume George's title, or perform the duties of that office.

VIII. QUO WARRANTO: VOID ORDER

107. The State incorporates and realleges the allegations in paragraphs 1 through 106 above.

108. The State brings this count in the name of the State of Texas under Chapter 66 of the Texas Civil Practice and Remedies Code. *See* Tex. Civ. Prac. & Rem. Code §§ 66.001(1), 66.002.

109. This count seeks to test Wong's claimed authority to hold or execute the office of Fort Bend County Judge. *See In re Dallas Cnty.*, 697 S.W.3d 142, 152 (Tex. 2024) (orig. proceeding) ("The purpose of a quo warranto proceeding is to question the right of a person or corporation, public or private, to exercise a public franchise or office." (quoting *Alexander Oil Co. v. City of Seguin*, 825 S.W.2d 434, 436–37 (Tex. 1991))).

110. Fort Bend County Judge is a public office created by Texas law. *See* Tex. Const. art. V, § 15; Tex. Loc. Gov't Code § 87.041(a)(1). Wong claims and exercises authority as Fort Bend County Judge.

111. Wong's claimed authority depends on the April 10 order entered in *Roberts v. George*, No. 25–DCV–335003. (Ex. E). That order purported to temporarily suspend George and appoint Wong "as county judge to perform the duties of the office under Texas Local Government Code § 87.017." (Ex. E).

112. The April 10 order was void when signed. Roberts was a private citizen. The State was not joined in her ouster proceeding, and no proper state official appeared on the State's behalf to prosecute the case. Under Texas law, "[i]ndividual citizens . . . have no right to maintain an ouster suit without being joined by a proper state official." *In re Wolfe*, 341 S.W.3d at 932 (quoting *Garcia*, 285 S.W.2d at 194). "Without joinder of the proper state official," the court does not "have jurisdiction to hear and determine the cause." *Id.*

113. Because the court lacked jurisdiction to hear and determine Roberts's ouster proceeding, the April 10 order conferred no authority on Wong. A court order entered without subject-matter jurisdiction is void. *See In re K.N.*, No. 24-0881, 2026 WL 1614378, at *6 ("But when a court lacks genuine subject-matter jurisdiction, its orders are void, not merely voidable."); *In re Panchakarla*, 602 S.W.3d at 539 ("If a trial court issues an order 'beyond its jurisdiction,' mandamus

relief is appropriate because such an order is void *ab initio*"); *Rivera*, 379 S.W.3d at 272.

114. A void order cannot suspend George, appoint Wong, or give Wong any legal right to hold or execute the office of Fort Bend County Judge.

115. George's later criminal-court suspension does not cure that defect. The criminal court suspended George without pay pending appeal under Texas Local Government Code § 87.032. (Ex. K). It did not declare the office vacant. (*Compare* Ex. E *with* Ex. K).

116. Wong therefore has no valid source of authority to hold or execute the office of Fort Bend County Judge. By continuing to claim and exercise that authority, Wong "usurps, intrudes into, or unlawfully holds or executes" the office within the meaning of Texas Civil Practice and Remedies Code § 66.001(1).

117. The State is entitled to judgment removing Wong from any claimed right to hold or execute the office of Fort Bend County Judge. Tex. Civ. Prac. & Rem. Code § 66.003(1).

IX.

ALTERNATIVE QUO WARRANTO: EXPIRED ORDER

118. The State incorporates and realleges the allegations in paragraphs 1 through 117 above.

119. The State pleads this count in the alternative. Even if the April 10 order had legal effect when signed, it was temporary and case-specific. It did not give

Wong any continuing right to hold or execute the office after the Roberts ouster proceeding ended. (Ex. E).

120. The April 10 order was entered under Texas Local Government Code § 87.017. That statute is titled "Suspension Pending Trial; Temporary Appointee." It allows a district judge to "temporarily suspend the officer" and appoint another person "to perform the duties of the office" during that temporary suspension. Tex. Loc. Gov't Code § 87.017(a).

121. The statute does not say that the temporary appointee holds the office. It does not fill a vacancy. And it does not appoint a permanent successor. It authorizes only a temporary appointee to perform duties during the pendency of the removal proceeding. *See id.* § 87.017(a)–(c).

122. The April 10 order used that same limited language. It appointed Wong only "to perform the duties of the office under Texas Local Government Code § 87.017." (Ex. E). It did not state that Wong holds the office, that he fills a vacancy, or that he may continue acting after the Roberts case ends. (*Id.*)

123. The Roberts case ended on June 17, 2026. Roberts nonsuited "all claims for relief and the entire case" against George, effective immediately on filing, and the court signed an order dismissing the ouster with prejudice. (Exs. F–G).

124. Under Texas Supreme Court authority, a nonsuit ends the case or controversy. A nonsuit "extinguishes a case or controversy from 'the moment the

motion is filed" and "renders the merits of the nonsuited case moot." *Blackmon*, 195 S.W.3d at 100 (quoting *Abu-Ahmad*, 783 S.W.2d at 211). A nonsuit also "can vitiate certain interlocutory orders, rendering them moot and unappealable." *Villafani*, 251 S.W.3d at 469. The same rule applies to temporary relief. *General Land Office*, 789 S.W.2d at 571 ("when the underlying action was dismissed, the temporary injunction dissolved automatically").

125. The April 10 order was temporary relief in a Chapter 87 ouster case. If it ever supplied Wong with authority, that authority ended when Roberts nonsuited the entire case and the court dismissed it. After that, no pending Chapter 87 proceeding remained to support a temporary appointment under § 87.017.

126. George's criminal-court suspension did not revive the expired April 10 order. The criminal court suspended George without pay pending appeal. (Ex. K). It did not declare a vacancy in the office of Fort Bend County Judge. (*Compare* Ex. E *with* Ex. K).

127. Nor would any later removal of George give Wong an automatic right to assume the office. If a vacancy in the office of county judge is lawfully created, that vacancy is filled by the Fort Bend County Commissioners Court. Tex. Const. art. V, § 28(b); Tex. Loc. Gov't Code § 87.041(a)(1), (c). Wong has no entitlement to assume the office under an expired temporary order from a dismissed case.

128. Wong therefore has no current source of authority to hold or execute the office of Fort Bend County Judge. By continuing to claim and exercise that authority, Wong "usurps, intrudes into, or unlawfully holds or executes" the office within the meaning of Texas Civil Practice and Remedies Code § 66.001(1).

129. The State is entitled to judgment removing Wong from any claimed right to hold or execute the office of Fort Bend County Judge. Tex. Civ. Prac. & Rem. Code § 66.003(1).

**X.
APPLICATION FOR
A TEMPORARY RESTRAINING ORDER
AND TEMPORARY INJUNCTION**

130. The State incorporates and realleges the allegations in paragraphs 1 through 129 above.

131. The State seeks temporary injunctive relief to protect the public's interest in lawful county government while this quo warranto proceeding is pending.

132. The purpose of temporary injunctive relief is to preserve the status quo of the litigation's subject matter pending trial on the merits. *See Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2002).

133. The relevant status quo is the last actual, peaceable, non-contested status that preceded the present controversy over Wong's authority to hold or execute the office.

134. The State does not seek temporary relief to adjudicate final title before final judgment. The State seeks temporary relief to prevent continued exercise of a public office by a person whose only claimed source of authority is void or expired.

135. The State has a cause of action against Wong. Chapter 66 authorizes quo warranto when a person usurps, intrudes into, or unlawfully holds or executes an office. Tex. Civ. Prac. & Rem. Code § 66.001(1).

136. The State has a probable right to relief. Wong's claimed authority depends on the April 10 order. (Ex. E). That order is void because the Roberts removal case was maintained without the State through the proper official. In the alternative, that order was temporary and expired when Roberts nonsuited the entire removal case.

137. The State and the public face probable, imminent, and irreparable injury unless temporary relief issues.

138. Public office is a public trust. The unlawful holding or execution of the office of Fort Bend County Judge injures the State's sovereign interest in lawful government and injures the public's interest in having county business conducted only by lawful officers.

139. The July 9, 2026 agenda shows an imminent Commissioners Court meeting at which Wong is being presented as "County Judge Daniel Wong,"

including for the invocation and pledges.⁷ The agenda itself is signed by "Daniel Wong, County Judge," showing that Wong is already holding himself out as County Judge before the meeting occurs.⁸

140. The agenda includes a closed session under Texas Government Code § 551.071 for attorney consultation on litigation, claims, and condemnation/easement matters, followed by reconvening in open session to consider action on those matters.⁹

141. The agenda includes items requiring execution of contracts, grant documents, legal-services agreements, closing documents, easements, plats, and other public instruments, several of which expressly authorize the "County Judge" or "County Judge Daniel Wong" to execute documents.¹⁰

142. Since Wong lacks authority to act as County Judge, his presiding over the July 9 meeting creates an immediate risk that the meeting will be conducted by an unauthorized presiding officer. Moreover, the following irreparable harm will likely result:

a. **Attorney-Client Privilege.** Section 551.071 allows a governmental body to conduct a private consultation with its attorney only for specified legal-advice purposes, including pending or contemplated litigation, settlement offers, or conflicts between counsel's duties and the Open Meetings

⁷ See https://agendalink.fortbendcountytexas.gov/print_agenda.cfm?id=&reloaded=true&seq=4108

⁸ See *id.*

⁹ See *id.*

¹⁰ See *id.*

Act. The July 9 closed session includes pending litigation, claims, and condemnation/easement matters; those are litigation-sensitive matters where privilege and strategy protections matter. If Wong lacks authority, his presence in a § 551.071 closed session is not the presence of the County Judge; it is the presence of a disputed claimant to office in a confidential attorney-client consultation. Disclosure of privileged legal advice to an unauthorized person creates an immediate and irreparable injury because privileged information, litigation strategy, settlement posture, and condemnation strategy cannot be "un-disclosed." A later damages award cannot restore confidentiality once privileged communications have been disclosed. A later ruling that some past acts are protected under de facto-officer principles would not undo the disclosure of confidential legal advice or restore the County's litigation posture. The privilege issue independently supports TRO relief because the harm occurs the moment Wong hears confidential legal advice. The privilege issue supports temporary-injunction relief because each future closed session creates the same irreparable risk.

b. **Open Meetings.** Only members of a governmental body have a right to attend a closed session.¹¹ And because Wong holds office by virtue of a void order, Wong's presence in the meeting is forbidden.¹² See Tex. Att'y Gen. Op. Nos. JM-6, at 1-2 (1983) (stating only members of the governmental body have the right to convene in executive session), KP-0006, at 2 (2015). Likewise, before a commissioners court enters closed session, it must first convene publicly, and the presiding officer must publicly announce the Open Meetings Act section authorizing the closed session. An unauthorized presiding officer creates a direct procedural defect at the moment the Court breaks into closed session. The July 9 agenda specifically contemplates a § 551.071 attorney-consultation closed session. If Wong calls, announces, leads, or participates in that closed session without authority, the validity of the closed session may be clouded from the outset. An Open Meetings Act defect does not merely create a technical issue; an action taken in violation of Chapter 551 is voidable, and threatened violations may be stopped, prevented, or reversed by injunction. Tex. Gov't Code § 551.142. A later lawsuit cannot fully cure the public harm from an unlawfully conducted closed session because the public's right is to lawful procedure before deliberation and action occur. TRO relief is necessary because the injury will

¹¹ See https://www.texasattorneygeneral.gov/sites/default/files/files/divisions/open-government/openmeetings_hb.pdf at 66.

¹² See *id.*

occur at the meeting itself, before a final quo warranto judgment can determine Wong's title. Temporary-injunction relief is necessary because the same procedural risk will recur at every Commissioners Court meeting while Wong continues to claim authority.

c. **Contracts / Plats.** The July 9 agenda includes an item authorizing "County Judge Daniel Wong" to execute a professional legal-services agreement and related document. The agenda includes real-property and project items authorizing the County Judge to sign closing documents and authorizing the County Clerk to record deeds and related documents in the Official Public Records. The agenda includes multiple contract, grant, purchasing, public-transportation, software, project-management, and law-enforcement procurement items that may require official execution or implementation after approval. The agenda also includes plat approvals and subdivision-related action items; unauthorized participation or execution creates risk to public records, development approvals, reliance interests, and title-related documents. If Wong signs contracts or public instruments without authority, every affected document becomes vulnerable to later challenge by counterparties, taxpayers, developers, grantors, vendors, title companies, auditors, or other governmental entities. The harm is not limited to whether the County ultimately wins a later lawsuit; the immediate injury is the creation of legally clouded public instruments. TRO relief is necessary to stop the immediate execution of disputed instruments before they are signed, recorded, transmitted, or relied upon. Temporary-injunction relief is necessary to prevent repeated unauthorized execution of county documents while the quo warranto action is pending.

143. Each day that Wong continues to hold himself out as Fort Bend County Judge creates additional public confusion, clouds the authority of county acts, and undermines the lawful administration of Fort Bend County government.

144. Money damages cannot remedy those injuries. No later award of damages can retroactively supply legal title to public office, undo unauthorized official acts, or restore the public's trust and interest in lawful county government during the pendency of this case.

145. The State therefore has no adequate remedy at law.

146. Unless restrained, Wong will continue to claim and exercise the powers of Fort Bend County Judge while this case is pending.

147. Temporary relief is necessary to preserve the Court's ability to grant effective final quo warranto relief.

Temporary Restraining Order

148. Under Texas Rule of Civil Procedure 680, a temporary restraining order may issue without notice if specific facts shown by affidavit or verified complaint establish that immediate and irreparable injury, loss, or damage will result before notice can be served and a hearing had.

149. The State requests that the Court issue a temporary restraining order restraining Wong, and those acting in active concert or participation with him who receive actual notice of the order, from:

- a. holding himself out as Fort Bend County Judge;
- b. exercising, attempting to exercise, or purporting to exercise the powers, duties, privileges, or authority of the office of Fort Bend County Judge;
- c. presiding over, voting in, participating in, or purporting to act as a member or presiding officer of the Fort Bend County Commissioners Court in the capacity of Fort Bend County Judge;
- d. signing, approving, executing, or issuing any order, agenda item, contract, instrument, appointment, authorization, directive, correspondence, or other official document in the capacity of Fort Bend County Judge;

e. directing, supervising, or instructing Fort Bend County officers, employees, agents, departments, or vendors in the capacity of Fort Bend County Judge;

f. obligating, approving, directing, or authorizing the expenditure of Fort Bend County funds in the capacity of Fort Bend County Judge;

g. accessing or using any non-public Fort Bend County systems, records, offices, accounts, credentials, devices, or communications by virtue of any claimed status as Fort Bend County Judge; and

h. receiving salary, benefits, reimbursement, staff support, office space, or other county resources by virtue of any claimed status as Fort Bend County Judge.

150. The requested temporary restraining order should remain in effect until the temporary-injunction hearing, subject to Rule 680's time limits and any extension allowed by law.

151. The State requests that the Court set the application for temporary injunction for hearing at the earliest possible date and that the temporary restraining order include the date, time, and place of that hearing, as Rule 680 requires.

152. If the Court requires notice before hearing the temporary restraining order application, the State requests that the Court set the application for immediate hearing on such notice as the Court deems reasonable.

153. If the Court grants the temporary restraining order without notice, the State will proceed with the temporary-injunction application when it comes on for hearing, as Rule 680 requires.

Temporary Injunction

154. The State also applies for a temporary injunction after notice and hearing. Tex. R. Civ. P. 681.

155. The State requests that, after notice and hearing, the Court issue a temporary injunction restraining Wong, and those acting in active concert or participation with him who receive actual notice of the order, from the same acts listed above until final judgment or further order of the Court.

156. The requested temporary injunction should preserve the public's interest in lawful county government until the Court enters final judgment on the State's quo warranto claims.

157. The State requests that any order granting a temporary injunction set this case for trial on the merits with respect to the ultimate relief sought, as Texas Rule of Civil Procedure 683 requires.

Verification, Specificity, and Bond

158. This application is verified below and is supported by the exhibits filed with it and the Court's judicial notice of the referenced court records. Tex. R. Civ. P. 682.

159. The requested temporary relief is specific in terms and describes in reasonable detail the acts sought to be restrained. Tex. R. Civ. P. 683.

160. The State requests that the Court state in any temporary restraining order or temporary-injunction order the reasons for issuance, the specific acts restrained, the date and hour of issuance, the expiration date of any order, the date of the temporary-injunction hearing, and the date for trial on the merits if a temporary injunction issues. Tex. R. Civ. P. 680, 683.

161. The State is exempt from bond and security requirements under Texas Civil Practice and Remedies Code § 6.001(a), (b)(1), and, to the extent applicable, § 6.001(c).

Counsel's Certification Regarding Notice

162. The State requests temporary relief with notice, if notice can be given and a hearing can be held before further irreparable public injury occurs.

163. If the Court determines that relief without notice is necessary, counsel for the State certifies under Rule 680 as follows:

a. Counsel has served or will serve this Information and application through the electronic filing manager on all counsel who have appeared for Wong in this matter or in the related proceedings, if available.

b. Counsel has also served or will serve this Information and application by e-mail on Christopher D. Hilton at chris@stonehilton.com.

c. Relief without notice is necessary only if the Court finds that Wong's continued exercise of the office before notice can be served and a hearing had will cause immediate and irreparable public injury by allowing a person with no lawful title to continue exercising the powers of a constitutional county office.

d. The State does not seek ex parte relief for tactical advantage. It seeks only the minimum temporary relief necessary to preserve the public interest and the Court's ability to grant effective final relief.

XI. CONDITIONS PRECEDENT

164. All conditions precedent to the State's right to bring this proceeding have occurred, have been performed, or have been waived.

CONCLUSION AND PRAYER

For these reasons, the State respectfully requests that the Court:

- a. order citation and process issued to Daniel Wong;
- b. grant the State's application for a temporary restraining order;
- c. set the State's application for temporary injunction for hearing at the earliest date permitted by law;
- d. after notice and hearing, grant the State's application for temporary injunction;
- e. fix security for any temporary restraining order or temporary injunction at \$0.00 and order that no bond, cash deposit, surety, or other security is required from the State;
- f. enter an expedited Level 3 schedule under Texas Rule of Civil Procedure 190.4;
- g. set an expedited traditional-summary-judgment schedule under Texas Rule of Civil Procedure 166a because this case presents a pure legal question: whether Wong has legal title or continuing authority to hold or execute the office of Fort Bend County Judge;
- h. alternatively, only if summary judgment does not dispose of all issues, set this matter for trial at the earliest practicable date;
- i. enter final judgment that Wong has no lawful right to hold or execute the office of Fort Bend County Judge; and
- j. grant all further relief to which the State is justly entitled.

Respectfully submitted,
Bridgette Smith-Lawson
Fort Bend County Attorney

By: /s/ Kevin T. Hedges

Bridgette Smith-Lawson
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401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(281) 341-4555
(281) 341-4557 (Fax)

ATTORNEYS FOR PLAINTIFF
THE STATE OF TEXAS

CERTIFICATE OF SERVICE

I certify that on July 6, 2026, a true and correct copy of the foregoing instrument was served on all parties/counsel identified on the attached Service List in accordance with Texas Rules of Civil Procedure 21 and 21a, by electronic service through the electronic filing manager to each recipient's e-service address on file with the manager and, where service through the electronic filing manager was not available, by e-mail to the address shown on the Service List below.

/s/ Kevin T. Hedges

Kevin T. Hedges

SERVICE LIST

Christopher D. Hilton
Stone Hilton PLLC
600 Congress Avenue, Suite 2350
Austin, Texas 78701
chris@stonehilton.com

STATE OF TEXAS §
 §
COUNTY OF FORT BEND §

VERIFICATION

Before me, the undersigned notary public, on this day personally appeared Kevin T. Hedges, Assistant Fort Bend County Attorney, who after being duly sworn, under oath as stated follows:

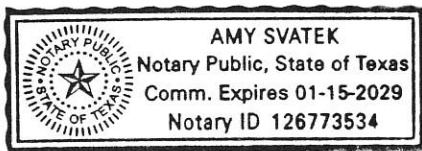
"My name is Kevin T. Hedges. I am over eighteen years of age, of sound mind, and capable of making this verification. I am an Assistant Fort Bend County Attorney, and I make this verification in my official capacity on behalf of the State of Texas.

I have read the Information in the Nature of Quo Warranto. The factual allegations set forth in the Information are true and based on my personal knowledge, including knowledge obtained through my official duties and review of official record."



Kevin T. Hedges
Assistant Fort Bend County Attorney

SUBSCRIBED and SWORN to before me on this 6th day of July, 2026, to certify which, witness my hand and official seal.



Notary Public in and for the State of Texas

Exhibit A



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DEGJBCGB-BFHAIEA-D
Case Number:	25-DCV-335003
Case Document:	Petition: Plaintiff's Original Petition

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



Honorable **Beverley McGrew Walker**
PORT BEND COUNTY DISTRICT CLERK

be conducted under a Level 2 Discovery Control Plan.

2. Relator seeks only nonmonetary relief.
3. The subject matter is within the jurisdictional limits of the court.

PARTIES AND SERVICE

4. Relator-Plaintiff, Sarah L. Roberts, is an individual who resides in Fort Bend County, Texas.

5. Defendant K.P. George, is the county judge of Fort Bend County, Texas, is an elected official of the state of Texas. The County Judge position was established in the constitution of Texas. Service of process on the Defendant may be affected under Rule 106 of the Texas Rule of Civil Procedure by delivering a copy to Defendant or by registered or certified mail return receipt requested.

JURISDICTION AND VENUE

6. This court has jurisdiction over the parties because Defendant, resides in the Fort Bend County and purposefully availed himself of the privilege of conducting activities in the State of Texas and established minimum contacts with said forum sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

7. This Court has subject matter jurisdiction pursuant to Section 87.015 of the Texas Local Government Code.

8. Venue is proper in Fort Bend County, Texas pursuant to Texas Local government Code § 87.015 because relator resides in Fort Bend, Texas for more than six months and Defendant is an officer subject to removal in Fort Bend, County.



STANDING

9. By and through Section 87.015(b) of the Texas Local Government Code, a petition for removal of an officer, such as Chief Judge, may be filed by any resident of the county in which the petition is to be filed and has resided within the State of Texas for at least the last six months. Plaintiff has resided in Texas for at least 6 months. Plaintiff also attended Fort Bend County Commissioners Court on July 8th, 2025, where her 1st Amendment rights to free speech were violated as she was cut off by Defendant, K.P. George and escorted out by security.²



FACTS

10. In various mediums, Defendant K.P. George has displayed a series of unprofessional, and inappropriate conduct during the course of his position as Fort Bend County Judge. These actions and misconducts have led to multiple criminal charges, and violations of 1st

² <https://fortbendcountytexas.new.swagit.com/videos/349053>; see time 59:05



Amended rights of Fort Bend County citizens.

11. The defendant, on or about June 7, 2017, used \$5,000 from his campaign account towards a down payment on the purchase of a Ford Expedition, a personal vehicle.

12. Continuously, beginning on or about November 8, 2018, and up until the filing of this petition, the defendant knowingly or recklessly misrepresented his qualifications by stating that he is a Certified Financial Planner (CFP).

13. Hastily, on or about July 15, 2019, the defendant filed a campaign finance report that omitted the \$46,500 in personal expenditures, omitted \$4,000 in campaign contributions, and included a \$3,000 loan repayment that the defendant did not make.

14. Also, on February 26, 2020, the day before initiating divorce proceedings, the defendant moved \$20,000 from his personal (individual) savings account into his campaign account. A few months later, the defendant transferred \$20,000 from his campaign account back to his individual savings account. The defendant omitted both transactions from his campaign finance reports.

15. Services rendered paid with improper funds by the Defendant. Beginning on or about April 3, 2021, and continuing through on or about October 1, 2021, the defendant misused government property by using county funds to pay Taral Patel, a campaign consultant, and/or Sadia Khan, a social media consultant, for services rendered to the defendant's political campaign. The payments were disbursed pursuant to an Agreement for Professional Consulting Services between the Office of the County Judge and a law firm.

16. Stuningly, beginning on or about April 3, 2021, and continuing through on or about April 1, 2022, the defendant conspired with Taral Patel to violate the Hatch Act. Patel, while employed with the federal government, contemporaneously worked on defendant's political



campaign and for the Office of the County Judge. Patel was paid by the County pursuant to an Agreement for the Professional Consulting Services between the Office of the County Judge and a law firm.

17. Beginning on or about April 3, 2021, and continuing through on or about November 6, 2022, the defendant conspired with Taral Patel to misuse government property, namely Fort Bend County property, personnel, and services that came into the defendant's possession by virtue of his office by using them for political advertising, namely the defendant's re-election campaign. The government property included, but was not limited to, employees, interns, money, information, and graphics created for official purposes.

18. On or about November 17, 2021, the defendant requested to pay Hina Qadri, who works directly beneath him, for services rendered to the defendant's political campaign through an Agreement for Professional Services between the Office of the County Judge and a law firm.

19. Beginning on or about April 15, 2022, and continuing through on or about October 1, 2022, the defendant misused government property by using county funds to pay Taral Patel for services rendered to the defendant's political campaign through an Agreement for Professional Services between the Office of the County Judge and DMK & Co. LLC.

20. Beginning on or about April 26, 2022, and continuing through November 28, 2022, the defendant conspired with Taral Patel, his friend and campaign consultant, to disseminate disinformation that benefitted defendant's political campaign or harmed his political opponent's using the alias Antonio Scalywag.

21. Beginning on or about September 18, 2022, and continuing until November 8, 2022, the defendant solicited, encouraged, or directed his campaign consultant, Taral Patel, to post comments on social media that appeared to attack the defendant. Patel posted racist comments



using several aliases including "Richard Melton," "Tim Harrison," and "Antonio Scalywag" and the defendant referenced the comments in a series of campaign communications online and in interviews to accuse his political opponent of being responsible for them.

22. On or about September 21, 2022, the defendant encouraged or directed members of his staff to intentionally conceal, remove, or otherwise impair the legibility or availability of a governmental record, namely Facebook posts by user "Alena Heede" that were posted to the official county government Facebook page.

23. On or about September 24, 2022, the defendant and Taral Patel falsified and disseminated a polling memo that misrepresented the defendants lead over his political opponent. The defendant referenced the memo in campaign communications and used it to mislead voters and to motivate donors to give money to his campaign.

24. On or about September 26, 2022, in Fort Bend County, Texas Kyle KP George acting with intent to promote or assist the commission of Misrepresentation of Identity, a Class A Misdemeanor offense, as described in Section 255.005 of the Texas Election Code, did then and there solicit, encourage, direct, aid, or attempt to aid, Taral Vipul Patel to misrepresent his (Patel's) identity in a campaign communication with intent to injure a candidate or influence the result of an election.

25. On or about July 22, 2023, the defendant offered, or intended to offer, his recommendation on the selection of an architect for a county project from a list of donors who contributed to his political campaign.

26. Upon information and belief, Defendant used campaign funds to purchase multiple properties in Fort Bend, County. Defendant enlisted the help of Jackson Matthey, a realtor, to purchase the properties.



27. On July 8th, 2025, K.P. George, during the routine Fort Bend County Commissioners Court, cut off speaker Sarah L. Roberts, in violation of her 1st Amended Rights. This intentional self-serving act was meant to silence the citizens of Fort Bend County. He then ordered a Fort Bend County Sheriff Deputy to escort her out of Commissioners Court.

28. Finally, on September 16th, 2025, K.P. George, during a recorded and live commissioners court, stated to Ms. Jessie Mathew, "No No No, hold on one second, YOU DON'T HAVE A FIRST AMENDED RIGHT HERE IN THIS COURT ROOM!" Then, presumably, the video Shows K.P. George looking to Commissioner Andy Meyers, asking if there is a 1st Amended Right, to which Commissioner Meyers nods his head. Clearly, K.P. George lacks the knowledge of not only the United States Constitution, but the Texas Constitution, and is portraying extreme mental, and cognitive disabilities in conducting himself.





INCOMPETENCY

29. Relator re-alleges and incorporates paragraphs 1 through 26 as though fully set forth herein.

30. Pursuant to Texas Government Code § 87.013, an officer may be removed for incompetency. Incompetency means:

- a. Gross ignorance of official duties;
- b. Gross carelessness in the discharge of those duties; or
- c. Unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

31. The above referenced conduct by K.P. George indicates either, gross ignorance of his official duties, gross carelessness in the discharge of those duties, or unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the



time of the officer's election.

OFFICIAL MISCONDUCT

32. Relator re-alleges and incorporates paragraphs 1 through 29 as though fully set forth herein.

33. Pursuant to Texas Government Code § 87.013(a)(2), an officer may be removed for official misconduct. Under Section 87.012(3) County Judge is subject to removal under the Texas Government Code. Official Misconduct is defined as "an intentional or corrupt failure, refusal, or neglect of an officer to perform a duty imposed on the officer by law."

34. Defendant KP George repeatedly engaged in intentional conduct as described herein to unlawfully influence the election of the Fort Bend County Commissioners Court.

SUSPENSION PENDING TRIAL - TEMPORARY APPOINTEE

35. Relator incorporates paragraphs 1-32 as though fully set forth below.

36. Relator requests this court immediately hold a hearing to temporarily suspend K.P. George from his duties as County Judge and appoint another person to perform the duties of the office.

37. Section 87.017 allows for suspension of an officer pending trial.

38. After the issuance of the order requiring citation of the officer, the district judge may temporarily suspend the officer and may appoint another person to perform the duties of the office.

39. The judge may not suspend the officer until the person appointed to serve executes a bond, with at least two good and sufficient sureties, in an amount fixed by the judge and conditioned as required by the judge. The bond shall be used to pay damages and costs to the suspended officer if the grounds for removal are found at trial to be insufficient or untrue. In an



action to recover on the bond it is necessary to allege and prove that the temporary appointee actively aided and instigated the filing and prosecution of the removal action. The suspended officer must also serve written notice on the temporary appointee and the appointee's bondsman, within 90 days after the date the bond is executed, stating that the officer intends to hold them liable on the bond and stating the grounds for that liability.

40. If the final judgment establishes the officer's right to the office, the county shall pay the officer from the general fund of the county an amount equal to the compensation received by the temporary appointee.

JURY DEMAND

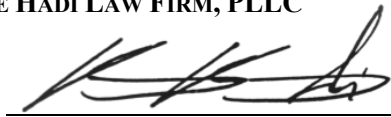
41. Pursuant to Section 87.018 of the Texas Local Government Code, a jury trial is hereby demanded.

PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff, Sarah L. Roberts, respectfully requests this Court enter an order removing K.P. George as County Judge of Fort Bend County and an order for Relator-Plaintiff's costs incurred in this petition. Relator-Plaintiff requests any and all further relief this Court deems just and proper.

Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 

Husein Hadi
Texas Bar No. 24067641
Jamil Thomas
Texas Bar No. 24066914
Ahson B. Wali
Texas Bar No. 24106815
Seve Thomas
Texas Bar No. 24115145



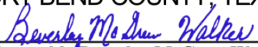
Nicholas Thomas
Texas Bar No. 24140421
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7100 Regency Square Boulevard, Suite 140
Houston, Texas 77036
Tel: (832) 433-7977
Fax: (855) 423-4529
litigation@thehadilawfirm.com
Attorneys for Relator

RELATOR HEREBY DEMANDS TRIAL BY JURY

DATE FILED: September 17, 2025



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS


Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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.

Ahson Wali on behalf of Ahson Wali
Bar No. 24106815
ahson@thehadilawfirm.com
Envelope ID: 105721115
Filing Code Description: Petition
Filing Description: Plaintiff's Original Petition
Status as of 9/17/2025 5:09 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	9/17/2025 3:02:01 PM	NOT SENT

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:09 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit B



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverly McGrew Walker
Date Issued:	7/2/2026 2:34:07 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DEGJEGFJ-BFHAIDG-F
Case Number:	25-DCV-335003
Case Document:	Amended Filing: Plaintiff's First Amended Petition

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



NO. 25-DCV-335003

SARAH L. ROBERTS,	§	IN THE DISTRICT COURT
Relator-Plaintiff,	§	
V.	§	
	§	
	§	
	§	400TH JUDICIAL DISTRICT
	§	
K.P. GEORGE,	§	
In his Official Capacity as County	§	OF FORT BEND COUNTY, TEXAS
Judge of Fort Bend County, Texas	§	

PLAINTIFF'S FIRST AMENDED PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Sarah L. Roberts, hereinafter called Relator-Plaintiff, complains of and about Kyle Prasad "K.P." George, (Hereinafter K.P. George), in his official capacity as Chief Judge of Fort Bend County, hereinafter called Defendant, and brings this action under Chapter 87 of the Local Government Code. In support of this First Amended Petition, Relator-Plaintiff would show unto the Court the following:

K.P. GEORGE HAS VIOLATED THE 1ST AMENDED RIGHTS OF TWO CITIZEN OF FORT BEND COUTNY, TEXAS, AS OF SEPTEMBER 16TH, 2025. THE FIRST, PLAINTIFF SARAH L. ROBERTS ON JULY 8TH, 2025, AND THE SECOND, MS. JESSIE MATHEW ON SEPTEMBER 16TH, 2025.¹

¹ <https://fortbendcountytexas.new.swagit.com/videos/355631>; see time 49:23.



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

DISCOVERY CONTROL PLAN LEVEL

1. Pursuant to the Texas Rules of Civil Procedure Plaintiff intends that discovery be conducted under a Level 2 Discovery Control Plan.
2. Relator seeks only nonmonetary relief.
3. The subject matter is within the jurisdictional limits of the court.

PARTIES AND SERVICE

4. Relator-Plaintiff, Sarah L. Roberts, is an individual who resides in Fort Bend County, Texas.
5. Defendant Kyle Prasad "K.P." George, is the county judge of Fort Bend County, Texas, is an elected official of the state of Texas. The County Judge position was established in the constitution of Texas. Service of process on the Defendant may be affected under Rule 106 of the Texas Rule of Civil Procedure by delivering a copy to Defendant or by registered or certified mail return receipt requested.

JURISDICTION AND VENUE

6. This court has jurisdiction over the parties because Defendant, resides in the Fort Bend County and purposefully availed himself of the privilege of conducting activities in the State of Texas and established minimum contacts with said forum sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.
7. This Court has subject matter jurisdiction pursuant to Section 87.015 of the Texas Local Government Code.
8. Venue is proper in Fort Bend County, Texas pursuant to Texas Local government



Code § 87.015 because relator resides in Fort Bend, Texas for more than six months and Defendant is an officer subject to removal in Fort Bend, County.

STANDING

9. By and through Section 87.015(b) of the Texas Local Government Code, a petition for removal of an officer, such as Chief Judge, may be filed by any resident of the county in which the petition is to be filed and has resided within the State of Texas for at least the last six months. Plaintiff has resided in Texas for at least 6 months. Plaintiff also attended Fort Bend County Commissioners Court on July 8th, 2025, where her 1st Amendment rights to free speech were violated as she was cut off by Defendant, K.P. George and escorted out by security.²



FACTS

10. In various mediums, Defendant K.P. George has displayed a series of

² <https://fortbendcountytexas.new.swagit.com/videos/349053>; see time 59:05



unprofessional, and inappropriate conduct during the course of his position as Fort Bend County Judge. These actions and misconducts have led to multiple criminal charges, and violations of 1st Amended rights of Fort Bend County citizens.

11. The defendant, on or about June 7, 2017, used \$5,000 from his campaign account towards a down payment on the purchase of a Ford Expedition, a personal vehicle.

12. Continuously, beginning on or about November 8, 2018, and up until the filing of this petition, the defendant knowingly or recklessly misrepresented his qualifications by stating that he is a Certified Financial Planner (CFP).

13. Hastily, on or about July 15, 2019, the defendant filed a campaign finance report that omitted the \$46,500 in personal expenditures, omitted \$4,000 in campaign contributions, and included a \$3,000 loan repayment that the defendant did not make.

14. Also, on February 26, 2020, the day before initiating divorce proceedings, the defendant moved \$20,000 from his personal (individual) savings account into his campaign account. A few months later, the defendant transferred \$20,000 from his campaign account back to his individual savings account. The defendant omitted both transactions from his campaign finance reports.

15. Services rendered paid with improper funds by the Defendant. Beginning on or about April 3, 2021, and continuing through on or about October 1, 2021, the defendant misused government property by using county funds to pay Taral Patel, a campaign consultant, and/or Sadia Khan, a social media consultant, for services rendered to the defendant's political campaign. The payments were disbursed pursuant to an Agreement for Professional Consulting Services between the Office of the County Judge and a law firm.

16. Stunningly, beginning on or about April 3, 2021, and continuing through on or



about April 1, 2022, the defendant conspired with Taral Patel to violate the Hatch Act. Patel, while employed with the federal government, contemporaneously worked on defendant's political campaign and for the Office of the County Judge. Patel was paid by the County pursuant to an Agreement for the Professional Consulting Services between the Office of the County Judge and a law firm.

17. Beginning on or about April 3, 2021, and continuing through on or about November 6, 2022, the defendant conspired with Taral Patel to misuse government property, namely Fort Bend County property, personnel, and services that came into the defendant's possession by virtue of his office by using them for political advertising, namely the defendant's re-election campaign. The government property included, but was not limited to, employees, interns, money, information, and graphics created for official purposes.

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21. Beginning on or about September 18, 2022, and continuing until November 8,



2022, the defendant solicited, encouraged, or directed his campaign consultant, Taral Patel, to post comments on social media that appeared to attack the defendant. Patel posted racist comments using several aliases including "Richard Melton," "Tim Harrison," and "Antonio Scalywag" and the defendant referenced the comments in a series of campaign communications online and in interviews to accuse his political opponent of being responsible for them.

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24. On or about September 26, 2022, in Fort Bend County, Texas Kyle KP George acting with intent to promote or assist the commission of Misrepresentation of Identity, a Class A Misdemeanor offense, as described in Section 255.005 of the Texas Election Code, did then and there solicit, encourage, direct, aid, or attempt to aid, Taral Vipul Patel to misrepresent his (Patel's) identity in a campaign communication with intent to injure a candidate or influence the result of an election.

25. On or about July 22, 2023, the defendant offered, or intended to offer, his recommendation on the selection of an architect for a county project from a list of donors who contributed to his political campaign.

26. Upon information and belief, Defendant used campaign funds to purchase multiple



properties in Fort Bend, County. Defendant enlisted the help of Jackson Matthey, a realtor, to purchase the properties.

27. On July 8th, 2025, K.P. George, during the routine Fort Bend County Commissioners Court, cut off speaker Sarah L. Roberts, in violation of her 1st Amended Rights. This intentional self-serving act was meant to silence the citizens of Fort Bend County. He then ordered a Fort Bend County Sheriff Deputy to escort her out of Commissioners Court.

28. Finally, on September 16th, 2025, K.P. George, during a recorded and live commissioners court, stated to Ms. Jessie Mathew, "No No No, hold on one second, YOU DON'T HAVE A FIRST AMENDED RIGHT HERE IN THIS COURT ROOM!" Then, presumably, the video Shows K.P. George looking to Commissioner Andy Meyers, asking if there is a 1st Amended Right, to which Commissioner Meyers nods his head. Clearly, K.P. George lacks the knowledge of not only the United States Constitution, but the Texas Constitution, and is portraying extreme mental, and cognitive disabilities in conducting himself.





INCOMPETENCY

29. Relator re-alleges and incorporates paragraphs 1 through 28 as though fully set forth herein.

30. Pursuant to Texas Government Code § 87.013, an officer may be removed for incompetency. Incompetency means:

- a. Gross ignorance of official duties;
- b. Gross carelessness in the discharge of those duties; or
- c. Unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.



31. The above referenced conduct by K.P. George indicates either, gross ignorance of his official duties, gross carelessness in the discharge of those duties, or unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

OFFICIAL MISCONDUCT

32. Relator re-alleges and incorporates paragraphs 1 through 31 as though fully set forth herein.

33. Pursuant to Texas Government Code § 87.013(a)(2), an officer may be removed for official misconduct. Under Section 87.012(3) County Judge is subject to removal under the Texas Government Code. Official Misconduct is defined as "an intentional or corrupt failure, refusal, or neglect of an officer to perform a duty imposed on the officer by law."

34. Defendant KP George repeatedly engaged in intentional conduct as described herein to unlawfully influence the election of the Fort Bend County Commissioners Court.

SUSPENSION PENDING TRIAL - TEMPORARY APPOINTEE

35. Relator incorporates paragraphs 1 through 34 as though fully set forth below.

36. Relator requests this court immediately hold a hearing to temporarily suspend K.P. George from his duties as County Judge and appoint another person to perform the duties of the office.

37. Section 87.017 allows for suspension of an officer pending trial.

38. After the issuance of the order requiring citation of the officer, the district judge may temporarily suspend the officer and may appoint another person to perform the duties of the office.

39. The judge may not suspend the officer until the person appointed to serve executes



a bond, with at least two good and sufficient sureties, in an amount fixed by the judge and conditioned as required by the judge. The bond shall be used to pay damages and costs to the suspended officer if the grounds for removal are found at trial to be insufficient or untrue. In an action to recover on the bond it is necessary to allege and prove that the temporary appointee actively aided and instigated the filing and prosecution of the removal action. The suspended officer must also serve written notice on the temporary appointee and the appointee's bondsman, within 90 days after the date the bond is executed, stating that the officer intends to hold them liable on the bond and stating the grounds for that liability.

40. If the final judgment establishes the officer's right to the office, the county shall pay the officer from the general fund of the county an amount equal to the compensation received by the temporary appointee.

JURY DEMAND

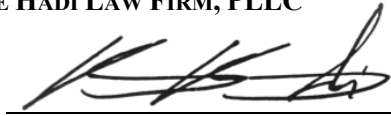
41. Pursuant to Section 87.018 of the Texas Local Government Code, a jury trial is hereby demanded.

PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff, Sarah L. Roberts, respectfully requests this Court enter an order removing Kyle Prasad "K.P." George as County Judge of Fort Bend County and an order for Relator-Plaintiff's costs incurred in this petition. Relator-Plaintiff requests any and all further relief this Court deems just and proper.

Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 

Husein Hadi

Texas Bar No. 24067641



Jamil Thomas
Texas Bar No. 24066914
Ahson B. Wali
Texas Bar No. 24106815
Seve Thomas
Texas Bar No. 24115145
Nicholas Thomas
Texas Bar No. 24140421
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Fax: (855) 423-4529
litigation@thehadilawfirm.com
Attorneys for Relator

RELATOR HEREBY DEMANDS TRIAL BY JURY

DATE FILED: September 17, 2025



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.

Ahson Wali on behalf of Ahson Wali
Bar No. 24106815
ahson@thehadilawfirm.com
Envelope ID: 105738884
Filing Code Description: Amended Filing
Filing Description: Plaintiff's First Amended Petition
Status as of 9/18/2025 10:40 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	9/17/2025 5:47:06 PM	SENT

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:07 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit C



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFAJFCDB-BFHAIDI-H
Case Number:	25-DCV-335003
Case Document:	Amended Filing: Plaintiff's Second Amended Petition

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



[illegible]

Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

be conducted under a Level 2 Discovery Control Plan.

PARTIES AND SERVICE

2. Relator-Plaintiff, Sarah L. Roberts, is an individual who resides in Fort Bend County, Texas.

3. Defendant K.P. George is the county judge of Fort Bend County, Texas, is an elected official of the state of Texas. The County Judge position was established in the constitution of Texas. Service may be affected under Section 87.016 of Texas Local Government Code by filing an application with the district judge for an order requiring a citation and a certified copy of the petition to be served on the officer. Plaintiff requests that the Court order that summons be issued and a certified copy of Plaintiff's Second Amended Petition also issue for service on Defendant.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the parties because Defendant resides in the Fort Bend County, Texas and purposefully availed himself of the privilege of conducting activities in the State of Texas and established minimum contacts with said forum sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

5. This Court has subject matter jurisdiction pursuant to Section 87.015 of the Texas Local Government Code.

6. Venue is proper in Fort Bend County, Texas pursuant to Texas Local government Code § 87.015 because relator is a resident of Texas and has resided in Fort Bend County, Texas for more than six months. Further, Relator is not under any indictment and Defendant is an officer



subject to removal in Fort Bend County, Texas.

STANDING

7. By and through Section 87.015(b) of the Texas Local Government Code, a petition for removal of an officer, such as Chief Judge, may be filed by any resident of the county in which the petition is to be filed and has resided within the State of Texas and in Fort Bend County for at least six months. The Plaintiff also affirms that she is not under any indictment within the county or any other place. Plaintiff swears to these facts by affidavit attached as Exhibit 1. Exhibit 1 is incorporated by reference herein. Plaintiff attended Fort Bend County Commissioners Court on July 8, 2025, where her 1st Amendment rights to free speech were violated as she was cut off by Defendant, K.P. George and escorted out by security.²



FACTS

² <https://fortbendcountytexas.new.swagit.com/videos/349053>; see time 59:05



8. In various mediums, Defendant K.P. George has displayed a series of unprofessional, and inappropriate conduct during the course of his position as Fort Bend County Judge. These actions and misconducts have led to multiple criminal charges, and violations of 1st Amendment rights of Fort Bend County citizens.

9. The Defendant, on or about June 7, 2017, used \$5,000 from his campaign account towards a down payment on the purchase of a Ford Expedition, a personal vehicle.

10. Continuously, beginning on or about November 8, 2018, and up until the filing of this suit, the Defendant knowingly or recklessly misrepresented his qualifications by stating that he is a Certified Financial Planner (CFP).

11. Hastily, on or about July 15, 2019, the Defendant filed a campaign finance report that omitted the \$46,500 in personal expenditures, omitted \$4,000 in campaign contributions, and included a \$3,000 loan repayment that the Defendant did not make.

12. Also, on February 26, 2020, the day before initiating divorce proceedings, the Defendant moved \$20,000 from his personal (individual) savings account into his campaign account. A few months later, the Defendant transferred \$20,000 from his campaign account back to his individual savings account. The Defendant omitted both transactions from his campaign finance reports.

13. Services rendered paid with improper funds by the Defendant. Beginning on or about April 3, 2021, and continuing through on or about October 1, 2021, the Defendant misused government property by using county funds to pay Taral Patel, a campaign consultant, and/or Sadia Khan, a social media consultant, for services rendered to the Defendant's political campaign. The payments were disbursed pursuant to an Agreement for Professional Consulting Services between the Office of the County Judge and a law firm.



14. Stunningly, beginning on or about April 3, 2021, and continuing through on or about April 1, 2022, the Defendant conspired with Taral Patel to violate the Hatch Act. Patel, while employed with the federal government, contemporaneously worked on Defendant's political campaign and for the Office of the County Judge. Patel was paid by the County pursuant to an agreement for professional consulting services between the Office of the County Judge and a law firm.

15. Beginning on or about April 3, 2021, and continuing through on or about November 6, 2022, the Defendant conspired with Taral Patel to misuse government property, namely Fort Bend County property, personnel, and services that came into the Defendant's possession by virtue of his office by using them for political advertising, namely the Defendant's re-election campaign. The government property included, but was not limited to, employees, interns, money, information, and graphics created for official purposes.

16. On or about November 17, 2021, the Defendant requested to pay Hina Qadri, who works directly beneath him, for services rendered to the Defendant's political campaign through an agreement for professional services between the Office of the County Judge and a law firm.

17. Beginning on or about April 15, 2022, and continuing through on or about October 1, 2022, the Defendant misused government property by using county funds to pay Taral Patel for services rendered to the Defendant's political campaign through an agreement for professional services between the Office of the County Judge and DMK & Co. LLC.

18. Beginning on or about April 26, 2022, and continuing through November 28, 2022, the Defendant conspired with Taral Patel, his friend and campaign consultant, to disseminate disinformation that benefitted Defendant's political campaign or harmed his political opponent's using the alias Antonio Scalywag.



19. Beginning on or about September 18, 2022, and continuing until November 8, 2022, the Defendant solicited, encouraged, or directed his campaign consultant, Taral Patel, to post comments on social media that appeared to attack the Defendant. Patel posted racist comments using several aliases including "Richard Melton," "Tim Harrison," and "Antonio Scalywag" and the Defendant referenced the comments in a series of campaign communications online and in interviews to accuse his political opponent of being responsible for them.

20. On or about September 21, 2022, the Defendant encouraged or directed members of his staff to intentionally conceal, remove, or otherwise impair the legibility or availability of a governmental record, namely Facebook posts by user "Alena Heede" that were posted to the official county government Facebook page.

21. On or about September 24, 2022, the Defendant and Taral Patel falsified and disseminated a polling memo that misrepresented the Defendant's lead over his political opponent. Defendant referenced the memo in campaign communications and used it to mislead voters and to motivate donors to give money to his campaign.

22. On or about September 26, 2022, in Fort Bend County, Texas Defendant K.P. George, acting with intent to promote or assist the commission of Misrepresentation of Identity, a Class A Misdemeanor offense, as described in Section 255.005 of the Texas Election Code, did then and there solicit, encourage, direct, aid, or attempt to aid, Taral Vipul Patel to misrepresent his (Patel's) identity in a campaign communication with intent to injure a candidate or influence the result of an election.

23. On or about July 22, 2023, the Defendant offered, or intended to offer, his recommendation on the selection of an architect for a county project from a list of donors who contributed to his political campaign.



24. Upon information and belief, Defendant used campaign funds to purchase multiple properties in Fort Bend, County. Defendant enlisted the help of Jackson Matthew, a realtor, to purchase the properties.

25. On July 8, 2025, Defendant K.P. George, during the routine Fort Bend County Commissioners Court, cut off speaker Sarah L. Roberts, in violation of her 1st Amendment Rights. This intentional self-serving act was meant to silence the citizens of Fort Bend County. He then ordered a Fort Bend County Sheriff Deputy to escort her out of Commissioners Court.

26. Finally, on September 16, 2025, Defendant K.P. George, during a recorded and live commissioners court, stated to Ms. Jessie Mathew, “No No No, hold on one second, YOU DON’T HAVE A FIRST AMENDMENT RIGHT HERE IN THIS COURT ROOM!” Then, presumably, the video shows Defendant K.P. George looking to Commissioner Andy Meyers, asking if there is a 1st Amendment Right, to which Commissioner Meyers nods his head. Clearly, Defendant K.P. George lacks the knowledge of not only the United States Constitution, but the Texas Constitution, and is portraying extreme mental, and cognitive disabilities in conducting himself.





INCOMPETENCY

27. Relator re-alleges and incorporates paragraphs 1 through 26 as though fully set forth herein.

28. Pursuant to Texas Government Code § 87.013, an officer may be removed for incompetency. Incompetency means:

- a. Gross ignorance of official duties;
- b. Gross carelessness in the discharge of those duties; or
- c. Unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.



29. The above referenced conduct by Defendant K.P. George indicates either, gross ignorance of his official duties, gross carelessness in the discharge of those duties, or unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

OFFICIAL MISCONDUCT

30. Relator re-alleges and incorporates paragraphs 1 through 29 as though fully set forth herein.

31. Pursuant to Texas Government Code § 87.013(a)(2), an officer may be removed for official misconduct. Under Section 87.012(3) County Judge is subject to removal under the Texas Government Code. Official Misconduct is defined as "an intentional or corrupt failure, refusal, or neglect of an officer to perform a duty imposed on the officer by law."

32. Defendant K.P. George repeatedly engaged in intentional conduct as described herein to unlawfully influence the election of the Fort Bend County Commissioners Court.

SUSPENSION PENDING TRIAL - TEMPORARY APPOINTEE

33. Relator incorporates paragraphs 1-32 as though fully set forth below.

34. Relator requests this court immediately hold a hearing to temporarily suspend Defendant K.P. George from his duties as County Judge and appoint another person to perform the duties of the office.

35. Section 87.017 allows for suspension of an officer pending trial.

36. After the issuance of the order requiring citation of the officer, the district judge may temporarily suspend the officer and may appoint another person to perform the duties of the office.

37. The judge may not suspend the officer until the person appointed to serve executes



a bond, with at least two good and sufficient sureties, in an amount fixed by the judge and conditioned as required by the judge. The bond shall be used to pay damages and costs to the suspended officer if the grounds for removal are found at trial to be insufficient or untrue. In an action to recover on the bond it is necessary to allege and prove that the temporary appointee actively aided and instigated the filing and prosecution of the removal action. The suspended officer must also serve written notice on the temporary appointee and the appointee's bondsman, within 90 days after the date the bond is executed, stating that the officer intends to hold them liable on the bond and stating the grounds for that liability.

38. If the final judgment establishes the officer's right to the office, the county shall pay the officer from the general fund of the county an amount equal to the compensation received by the temporary appointee.

JURY DEMAND

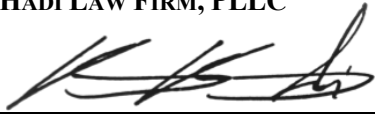
39. Pursuant to Section 87.018 of the Texas Local Government Code, a jury trial is hereby demanded.

PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff, Sarah L. Roberts, respectfully requests this Court enter an order removing Defendant K.P. George as County Judge of Fort Bend County and an order for Relator-Plaintiff's costs incurred in this petition. Relator-Plaintiff requests any and all further relief this Court deems just and proper.

Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 
 Husein Hadi
 Texas Bar No. 24067641



Jamil Thomas
Texas Bar No. 24066914
Ahson B. Wali
Texas Bar No. 24106815
Seve Thomas
Texas Bar No. 24115145
Nicholas Thomas
Texas Bar No. 24140421
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Texas Bar No. 24102815
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Houston, Texas 77036
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Fax: (855) 423-4529
litigation@thehadilawfirm.com
Attorneys for Relator

RELATOR HEREBY DEMANDS TRIAL BY JURY

DATE FILED: November 21, 2025



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

EXHIBIT 1



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

NO. 25-DCV-335003

SARAH L. ROBERTS
Relator-Plaintiff,

V.

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

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IN THE DISTRICT COURT

400th JUDICIAL DISTRICT

FORT BEND COUNTY, TEXAS

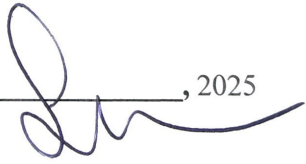
AFFIDAVIT OF SARAH L. ROBERTS

Before me, the undersigned authority, on this day personally appeared Sarah Roberts who swore under oath that the following facts are true:

“My name is Sarah L. Roberts. I am over 18 years of age and of sound mind and fully competent to make this affidavit. I am a resident of Texas. I reside in Fort Bend County, Texas and have resided in Fort Bend County, Texas for at least six months. I am not currently under indictment in the county or anywhere else.”

Further, affiant sayeth not.

Signed on November 21st, 2025



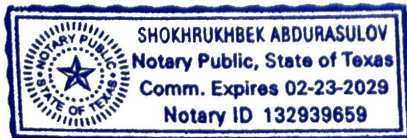
Sarah L. Roberts

SUBSCRIBED AND SWORN TO before me on November 21st 2025
by the above Sarah L. Roberts



Notary Public in and for
The State of Texas

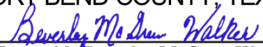
My Commission Expires: 02/23/2029



1



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS



Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

CERTIFICATE OF SERVICE

Undersigned counsel hereby affirms that the foregoing was served on all parties and their counsel who have entered their appearances herein.



Attorney for Plaintiff



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.

Ahson Wali on behalf of Ahson Wali
Bar No. 24106815
ahson@thehadilawfirm.com
Envelope ID: 108348993
Filing Code Description: Amended Filing
Filing Description: Plaintiff's Second Amended Petition
Status as of 11/21/2025 3:26 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	11/21/2025 3:09:22 PM	SENT
Jared Woodfill		woodfillservice@gmail.com	11/21/2025 3:09:22 PM	SENT

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:08 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit D



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFBBDHJB-BFHAIDH-C
Case Number:	25-DCV-335003
Case Document:	Amended Filing: Plaintiff's Third Amended Petition

HOW TO VERIFY THIS DOCUMENT

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[illegible]

TO THE HONORABLE JUDGE OF SAID COURT:

K.P. GEORGE HAS VIOLATED THE 1ST AMENDMENT RIGHTS OF TWO CITIZENS OF FORT BEND COUNTY, TEXAS, AS OF SEPTEMBER 16, 2025. THE FIRST, IS PLAINTIFF SARAH L. ROBERTS ON JULY 8, 2025, AND THE SECOND, IS A WOMAN NAMED MS. JESSIE MATHEW ON SEPTEMBER 16, 2025.¹

1



Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

DISCOVERY CONTROL PLAN LEVEL

1. Pursuant to the Texas Rules of Civil Procedure Plaintiff intends that discovery be conducted under a Level 2 Discovery Control Plan.

PARTIES AND SERVICE

2. Relator-Plaintiff, Sarah L. Roberts, is an individual who resides in Fort Bend County, Texas.

3. Defendant K.P. George is the county judge of Fort Bend County, Texas, is an elected official of the state of Texas. The County Judge position was established in the constitution of Texas. Service may be affected under Section 87.016 of Texas Local Government Code by filing an application with the district judge for an order requiring a citation and a certified copy of the petition to be served on the officer. Plaintiff requests that the Court order that summons be issued and a certified copy of Plaintiff's Second Amended Petition also issue for service on Defendant.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the parties because Defendant resides in the Fort Bend County, Texas and purposefully availed himself of the privilege of conducting activities in the State of Texas and established minimum contacts with said forum sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

5. This Court has subject matter jurisdiction pursuant to Section 87.015 of the Texas Local Government Code.

6. Venue is proper in Fort Bend County, Texas pursuant to Texas Local government



Code § 87.015 because relator is a resident of Texas and has resided in Fort Bend County, Texas for more than six months. Further, Relator is not under any indictment and Defendant is an officer subject to removal in Fort Bend County, Texas.

STANDING

7. By and through Section 87.015(b) of the Texas Local Government Code, a petition for removal of an officer, such as Chief Judge, may be filed by any resident of the county in which the petition is to be filed and has resided within the State of Texas and in Fort Bend County for at least six months. The Plaintiff also affirms that she is not under any indictment within the county or any other place. Plaintiff swears to these facts by affidavit attached as Exhibit 1. Exhibit 1 is incorporated by reference herein. Plaintiff attended Fort Bend County Commissioners Court on July 8, 2025, where her 1st Amendment rights to free speech were violated as she was cut off by Defendant, K.P. George and escorted out by security.²

² <https://fortbendcountytexas.new.swagit.com/videos/349053>; see time 59:05





FACTS

8. In various mediums, Defendant K.P. George has displayed a series of unprofessional, and inappropriate conduct during the course of his position as Fort Bend County Judge. These actions and misconduct have led to multiple criminal charges, and violations of 1st Amendment rights of Fort Bend County citizens.

9. On July 8, 2025, Defendant K.P. George, during a session of Fort Bend County Commissioners Court, cut off speaker Sarah L. Roberts, in violation of her 1st Amendment Rights. This intentional self-serving act was meant to silence the citizens of Fort Bend County, Texas. He then ordered a Fort Bend County Sheriff Deputy to escort her out of Commissioners Court.

10. On September 16, 2025, Defendant K.P. George, during a recorded and live commissioners court, stated to Ms. Jessie Mathew, “No No No, hold on one second, YOU DON’T HAVE A FIRST AMENDMENT RIGHT HERE IN THIS COURT ROOM!” Then, the video



appears shows Defendant K.P. George looking to Commissioner Andy Meyers, asking if there is a 1st Amendment Right, to which Commissioner Meyers nods his head. Clearly, Defendant K.P. George lacks the knowledge of not only the United States Constitution, but the Texas Constitution, and is portraying extreme mental, and cognitive disabilities in conducting himself.



INCOMPETENCY

11. Relator re-alleges and incorporates paragraphs 1 through 10 as though fully set forth herein.

12. Pursuant to Texas Government Code § 87.013, an officer may be removed for incompetency. Incompetency means:

- a. Gross ignorance of official duties;



- b. Gross carelessness in the discharge of those duties; or
- c. Unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

13. The above referenced conduct by Defendant K.P. George indicates either, gross ignorance of his official duties, gross carelessness in the discharge of those duties, or unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

OFFICIAL MISCONDUCT

14. Relator re-alleges and incorporates paragraphs 1 through 13 as though fully set forth herein.

15. Pursuant to Texas Government Code § 87.013(a)(2), an officer may be removed for official misconduct. Under Section 87.012(3) County Judge is subject to removal under the Texas Government Code. Official Misconduct is defined as "an intentional or corrupt failure, refusal, or neglect of an officer to perform a duty imposed on the officer by law."

16. Defendant K.P. George repeatedly engaged in intentional conduct as described herein to unlawfully influence the election of the Fort Bend County Commissioners Court.

SUSPENSION PENDING TRIAL - TEMPORARY APPOINTEE

17. Relator incorporates paragraphs 1-16 as though fully set forth below.

18. Relator requests this court immediately hold a hearing to temporarily suspend Defendant K.P. George from his duties as County Judge and appoint another person to perform the duties of the office.

19. Section 87.017 allows for suspension of an officer pending trial.



20. After the issuance of the order requiring citation of the officer, the district judge may temporarily suspend the officer and may appoint another person to perform the duties of the office.

21. The judge may not suspend the officer until the person appointed to serve executes a bond, with at least two good and sufficient sureties, in an amount fixed by the judge and conditioned as required by the judge. The bond shall be used to pay damages and costs to the suspended officer if the grounds for removal are found at trial to be insufficient or untrue. In an action to recover on the bond it is necessary to allege and prove that the temporary appointee actively aided and instigated the filing and prosecution of the removal action. The suspended officer must also serve written notice on the temporary appointee and the appointee's bondsman, within 90 days after the date the bond is executed, stating that the officer intends to hold them liable on the bond and stating the grounds for that liability.

22. If the final judgment establishes the officer's right to the office, the county shall pay the officer from the general fund of the county an amount equal to the compensation received by the temporary appointee.

JURY DEMAND

23. Pursuant to Section 87.018 of the Texas Local Government Code, a jury trial is hereby demanded.

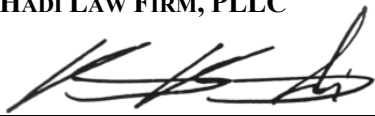
PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff, Sarah L. Roberts, respectfully requests this Court enter an order removing Defendant K.P. George as County Judge of Fort Bend County and an order for Relator-Plaintiff's costs incurred in this petition. Relator-Plaintiff requests any and all further relief this Court deems just and proper.



Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 
Husein Hadi
Texas Bar No. 24067641
Jamil Thomas
Texas Bar No. 24066914
Ahson B. Wali
Texas Bar No. 24106815
Seve Thomas
Texas Bar No. 24115145
Nicholas Thomas
Texas Bar No. 24140421
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Fax: (855) 423-4529
litigation@thehadilawfirm.com
Attorneys for Relator

RELATOR HEREBY DEMANDS TRIAL BY JURY

DATE FILED: November 25, 2025



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

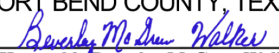

Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

EXHIBIT 1



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

NO. 25-DCV-335003

SARAH L. ROBERTS
Relator-Plaintiff,

V.

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

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IN THE DISTRICT COURT

400th JUDICIAL DISTRICT

FORT BEND COUNTY, TEXAS

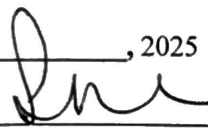
AFFIDAVIT OF SARAH L. ROBERTS

Before me, the undersigned authority, on this day personally appeared Sarah Roberts who swore under oath that the following facts are true:

"My name is Sarah L. Roberts. I am over 18 years of age and of sound mind and fully competent to make this affidavit. I am a resident of Texas. I reside in Fort Bend County, Texas and have resided in Fort Bend County, Texas for at least six months. I am not currently under indictment in the county or anywhere else. I have read the contents of the Third Amended Petition and I affirm under the penalty of perjury that the Third Amended Petition is true and correct."

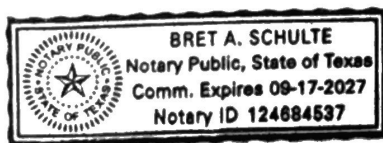
Further, affiant sayeth not.

Signed on November 25, _____, 2025


Sarah L. Roberts

SUBSCRIBED AND SWORN TO before me on November 25, 2025

by the above Sarah L. Roberts

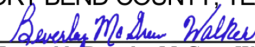



Notary Public in and for Texas

1



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS


Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

CERTIFICATE OF SERVICE

Undersigned counsel hereby affirms that the foregoing was served on all parties and their counsel who have entered their appearances herein.



Attorney for Plaintiff



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.

Ahson Wali on behalf of Ahson Wali
Bar No. 24106815
ahson@thehadilawfirm.com
Envelope ID: 108465602
Filing Code Description: Amended Filing
Filing Description: Plaintiff's Third Amended Petition
Status as of 11/25/2025 4:48 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	11/25/2025 3:19:09 PM	SENT
Jared Woodfill		woodfillservice@gmail.com	11/25/2025 3:19:09 PM	SENT

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:08 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit E



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:31:46 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFJAHHEH-BFHAICJ-J
Case Number:	25-DCV-335003
Case Document:	Order: Order

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.





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);

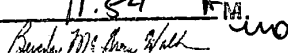
Signed this 10th day of April 2026



JUDGE JETH JONES
400th JUDICIAL DISTRICT
JUDGE PRESIDING

FILED

APR 10 2026

AT 11:54 PM

CLERK DISTRICT COURT, FORT BEND CO., TX

I, BEVERLEY MCGREW WALKER, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-DCV-335003, 7/2/2026 2:31:46 PM


The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit F



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDEIJIE-BFHAIDJ-G
Case Number:	25-DCV-335003
Case Document:	Motion (No Fee): Notice of Nonsuit

HOW TO VERIFY THIS DOCUMENT

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Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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@thehadilawfirm.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

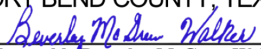
Jared R. Woodfill
woodfillservice@gmail.com
5850 San Felipe, 5th Floor
Houston, TX 77057
Tel: (713) 751-3080
ATTORNEYS FOR K. P. George

By: _____

Husein Hadi



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS


Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:08 PM

Beverly McGrew Walker
 The Honorable Beverley McGrew Walker
 FORT BEND COUNTY DISTRICT CLERK

Exhibit G



Electronically Certified Court Record

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDGFJCH-BFHAIEB-G
Case Number:	25-DCV-335003
Case Document:	Dismissed by Plaintiff/Non-Suit/Other: Order Granting Notic

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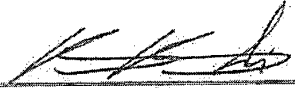


Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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 Staggs

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

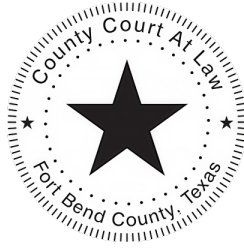
Fax: (855) 423-4529

litigation@thehadilawfirm.com

Attorneys for Plaintiffs



Exhibit H



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County Clerk
County Clerk:	The Honorable Laura Richard
Date Issued:	7/6/2026 10:23:43 AM
Unique Reference Number:	CAA-CACFBABCCDAEDH-EIBFHBAA-DCGGJJDE-BFHCAGD-F
Case Number:	24-CCR-241836
Case Document:	Indictment: 1st QC-ckr/NE
Requesting Party Code:	20251012230437
Requesting Party Reference:	rolf.krueger@fortbendcountytexas.gov

HOW TO VERIFY THIS DOCUMENT

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THE STATE OF TEXAS

Charann Thompson
255.005(a)
26040004

VS

KYLE PRASAD GEORGE

24-CCR-241836
INDI
Indictment
7157470

D.O.B.: 03/25/1964	CONTROL NO: 24-009739
CHARGE: MISREPRESENT IDENTITY/CANDIDATE/ MA	ARREST DATE: NA/ WARRANT
CASE NO: 24-CCR-241836	OFFENSE DATE: September 26, 2022
COUNTY COURT AT LAW NO: 5	AGENCY/AGENCY #: DISTRICT ATTORNEY/ 24008
RAIL AMOUNT: \$1,000.00 PR TW	PRIOR CASE #:
RELATED CASES:	CO-DEF:

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

The duly organized Grand Jury of Fort Bend County, Texas, presents in the County Court of Fort Bend County, Texas, that in Fort Bend County, Texas, **KYLE PRASAD GEORGE**, hereafter styled the Defendant, heretofore on or about **September 26, 2022**, did then and there misrepresent defendant's identity, namely by posing as Facebook user "Antonio Scalywag", in a campaign communication posted on defendant's Facebook page with intent to injure a candidate or influence the result of an election;

FILED
2024 SEP 26 PM 12:04
D. J. W.
COUNTY CLERK
FORT BEND COUNTY TEXAS

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Kenneth Shavers
FOREMAN OF THE GRAND JURY

INDICTMENT (ORIGINAL/DA)

I, **LAURA RICHARD**, County Clerk of Fort Bend County, Texas, do hereby certify that the foregoing is a true and correct copy as the same appears on file and recorded in the appropriate records.
Note: A portion of this document may have been redacted as allowed by law.



24-CCR-241836, 7/6/2026 10:23:43 AM
Laura Richard
24-CCR-241836, 7/6/2026 10:23:43 AM
The Honorable Laura Richard
FORT BEND COUNTY, TEXAS

Exhibit I



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:46:27 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFBAICFE-BFHAIJB-J
Case Number:	25-DCR-110888A
Case Document:	Indictment: \$10,000.00

HOW TO VERIFY THIS DOCUMENT

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THE STATE OF TEXAS

VS

KYLE PRASAD GEORGE

25-DCR-110888A
INDI 1
Indictment
7374939



Charann Thompson
34.02(e) (2)
63000002

D.O.B.: 03/25/1964	DA CONTROL NO: 25-002886
FELONY CHARGE: MONEY LAUNDERING >=\$30K<\$150K/ F3	ARREST DATE: RE-INDICTMENT
CAUSE NO: 25-DCR-110888A	OFFENSE DATE: April 22, 2019
DISTRICT COURT NO: 458TH	AGENCY/AGENCY NO: DISTRICT ATTORNEY/ 2401
BAIL AMOUNT: \$10,000.00	PRIOR CAUSE NO: 25-DCR-110888
RELATED: MONEY LAUNDERING >=\$30K<\$150K	CO-DEF:

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

The duly organized Grand Jury of Fort Bend County, Texas, presents in the District Court of Fort Bend County, Texas, that in Fort Bend County, Texas, KYLE PRASAD GEORGE, hereafter styled the Defendant, heretofore on or about April 22, 2019,

PARAGRAPH I

did then and there knowingly possess, and/or transfer, and/or transport the proceeds of criminal activity, namely, the felony of wire fraud in violation of 18 United States Code Section 1343;

And it is further presented that the proceeds of the criminal activity are related to one scheme or continuing course of conduct, and the aggregate value of the proceeds is \$30,000 or more but less than \$150,000

PARAGRAPH II

did then and there knowingly conduct and/or facilitate one or more transactions involving the proceeds of criminal activity, namely the felony of wire fraud in violation of 18 United States Code Section 1343;

And it is further presented that the proceeds of the criminal activity are related to one scheme or continuing course of conduct, and the aggregate value of the proceeds is \$30,000 or more but less than \$150,000

AGAINST THE PEACE AND DIGNITY OF THE STATE.

FILED

2025 NOV 24 PM 1:35

Beverly McGrew Walker

CLERK DISTRICT COURT
FORT BEND CO., TX

David Kelly
FOREMAN OF THE GRAND JURY

INDICTMENT (ORIGINAL/DA)

I, BEVERLEY MCGREW WALKER, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-DCR-110888A, 7/2/2026 2:46:27 PM

Beverly McGrew Walker
The Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit J



Electronically Certified Court Record

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:53:41 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFBAIBEA-BFHAJBE-H
Case Number:	25-DCR-110889A
Case Document:	Indictment: \$10,000.00

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THE STATE OF TEXAS

VS

KYLE PRASAD GEORGE

25-DCR-110889A
INDI 1
Indictment
7374930

Charann Thompson
34.02 (e) (2)
63000002



D.O.B.: 03/25/1964	DA CONTROL NO: 25-002873
FELONY CHARGE: MONEY LAUNDERING >=\$30K<\$150K/ F3	ARREST DATE: RE-INDICTMENT
CAUSE NO: 25-DCR-110889A	OFFENSE DATE: January 28, 2019 - April 22, 2019
DISTRICT COURT NO: 458TH	AGENCY/AGENCY NO: DISTRICT ATTORNEY/ 24041
BAIL AMOUNT: \$10,000.00	PRIOR CAUSE #: 25-DCR-110889
RELATED CASE: MONEY LAUNDERING >=\$30K<\$150K	CO-DEF:

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

The duly organized Grand Jury of Fort Bend County, Texas, presents in the District Court of Fort Bend County, Texas, that in Fort Bend County, Texas, KYLE PRASAD GEORGE, hereafter styled the Defendant, heretofore on or about January 28, 2019, and continuing through April 22, 2019,

PARAGRAPH I

did then and there knowingly possess, and/or transfer, and/or transport the proceeds of criminal activity, namely, the felony of tampering with a governmental record, to wit: a campaign finance report filed on or about January 14, 2019;

And it is further presented that the proceeds of the criminal activity are related to one scheme or continuing course of conduct, and the aggregate value of the proceeds is \$30,000 or more but less than \$150,000.

PARAGRAPH II

did then and there knowingly conduct and/or facilitate one or more transactions, to wit: a transfer of \$30,000, and/or a transfer of \$16,500, and/or a withdrawal of \$52,045.49, which involved the proceeds of criminal activity, namely, the felony of tampering with a governmental record, to wit: a campaign finance report filed on or about January 14, 2019;

And it is further presented that the proceeds of the criminal activity are related to one scheme or continuing course of conduct, and the aggregate value of the proceeds is \$30,000 or more but less than \$150,000.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

FILED

2025 NOV 24 PM 1:35

Beverly McGrew Walker

CLERK DISTRICT COURT
FORT BEND CO. TX

INDICTMENT (ORIGINAL/DA)

David K...
FOREMAN OF THE GRAND JURY

I, BEVERLEY MCGREW WALKER, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-DCR-110889A, 7/2/2026 2:53:41 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit K



Electronically Certified Court Record

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:53:41 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDEBFFI-BFHAJBG-D
Case Number:	25-DCR-110889A
Case Document:	Order: State's Proposed Order Requesting Order on Suspensio

HOW TO VERIFY THIS DOCUMENT

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25-DOR-1168894, 7/7/2026 2:53:41 PM
Beverley McGrew Walker
 25-DOR-1168894, 7/7/2026 2:53:41 PM
 The Honorable Beverley McGrew Walker
 FORT BEND COUNTY DISTRICT CLERK

Exhibit L



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:46:27 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDECAJB-BFHAIJC-I
Case Number:	25-DCR-110888A
Case Document:	Conviction - Not Guilty Plea Jury Verdict: Judgment of Conv

HOW TO VERIFY THIS DOCUMENT

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CAUSE No. 25-DCR-110888A

INCIDENT NO. /TRN: 924590184X

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



THE STATE OF TEXAS

v.

GEORGE, KYLE PRASAD
STATE ID No.: TX-11224203

§
§
§
§
§
§

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

Offense for which Defendant Convicted:

MONEY LAUNDERING >=\$30K<\$150K

Charging Instrument:

Indictment

Statute for Offense:

34.02(e)(2)

Date of Offense:

04/22/2019

Plea to Offense:

Not Guilty

Degree of Offense: Third Degree Felony

Verdict of Jury: Guilty

Findings on Deadly Weapon: N/A

1st Enhancement N/A

Finding on 1st Enhancement N/A

Paragraph:

Paragraph:

2nd Enhancement N/A

Finding on 2nd

Paragraph:

Enhancement Paragraph: N/A

Punishment Assessed by:

Date Sentence Commences: (Date does not apply to confinement served as a condition of community supervision.)

Judge

6/16/2026



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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:

\$ 5000

Restitution:

\$ 0

Restitution Payable to: NA

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

Court Costs:

\$ 310.00

Reimbursement Fees:

\$ 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



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FORT BEND COUNTY, TEXAS

Beverly McGrew Walker

Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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)



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Beverly McGrew Walker
Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



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



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FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Cause No: 25-DCR-110888A

THE STATE OF TEXAS

§ IN THE DISTRICT COURT OF

so

VS.

§ FORT BEND COUNTY, TEXAS

ස

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;



- 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, 20 28; 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, 20 26 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;

Unique Code : CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDECAJB-BFHAIJC-I Page 8 of 13



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

[Signature]
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. J. [Signature]
Judge Presiding

JUN 16 2026
AT 4:56 P M.
Beverly McGraw Walker
CLERK DISTRICT COURT, FORT BEND CO., TX

6

25-DCR-110888A



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FORT BEND COUNTY, TEXAS

Beverly McGraw Walker
Honorable Beverly McGraw Walker
FORT BEND COUNTY DISTRICT CLERK

CAUSE NO. 25-DCR-110889A

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

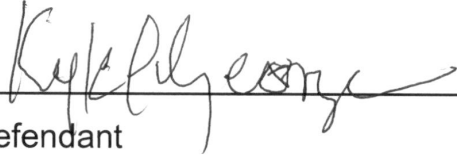
FILED

JUN 16 2026 8:00
AT 4:56 P M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



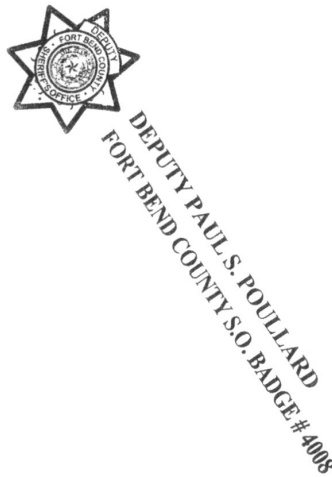
ACKNOWLEDGMENT

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 Syntek / Richard #208



Exhibit M



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:53:41 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDECAIH-BFHAJBF-D
Case Number:	25-DCR-110889A
Case Document:	Conviction - Not Guilty Plea Jury Verdict: Judgment of Conv

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.





CAUSE No. 25-DCR-110889A

INCIDENT No. /TRN: 924590184X

25-DCR-110889A
 CONJV 66
 Conviction - Not Guilty Plea Jury Verdict
 7484819



THE STATE OF TEXAS

v.

GEORGE, KYLE PRASAD
 STATE ID No.: TX-11224203

§
 §
 §
 §
 §
 §

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: **Woodfill, Jared**Offense for which Defendant Convicted:**MONEY LAUNDERING >=\$30K<\$150K**Charging Instrument:Statute for Offense:**Indictment****34.02(e)(2)**Date of Offense:Plea to Offense:**04/22/2019****Not Guilty**Degree of Offense: Third Degree FelonyVerdict of Jury: GuiltyFindings on Deadly Weapon: N/A1st Enhancement N/AFinding on 1st Enhancement N/A

Paragraph:

Paragraph:

2nd Enhancement N/AFinding on 2nd

Paragraph:

Enhancement Paragraph:

N/A

Punishment Assessed by:Date Sentence Commences: (Date does not apply to confinement served as a condition of community supervision.)**Judge****6/16/2026**

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 FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
 Honorable Beverly McGrew Walker
 FORT BEND COUNTY DISTRICT CLERK

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:

\$ 5,000

Restitution:

\$ NA

Restitution Payable to: NA

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

Court Costs:

\$ 310.00

Reimbursement Fees:

\$ NA

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.



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FORT BEND COUNTY, TEXAS

Beverly McGrew Walker

Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

☒ **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) \$ **5000** (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



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverly McGrew Walker

FORT BEND COUNTY DISTRICT CLERK

☐ 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

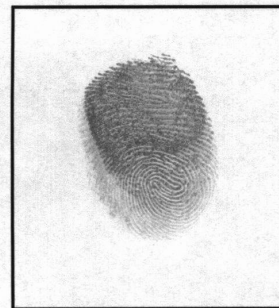
X *Maggie Pi-Juan*
JUDGE PRESIDING

FILED

JUN 16 2026 *805*
AT 4:57 P M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



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



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Cause No: 25-DCR-110889A

THE STATE OF TEXAS

§ IN THE DISTRICT COURT OF

20

VS.

§ FORT BEND COUNTY, TEXAS

20

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 25 DEC 110888 A

25-DCR-110889A



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverley McGrew Walker
Honorable Beverley McGrew Walker

FORT BEND COUNTY DISTRICT CLERK

- 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, 2029; 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;
Runs CC W 25DCR 110888A
- 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 W 25DCR 110888A*

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 CL W/ 25 DCR 110888A

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;

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;

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;

Unique Code : CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDECAIH-BFHJBF-D Page 8 of 13



SPECIAL AMENDMENT TO TERMS OF COMMUNITY SUPERVISION

CAUSE # 25-DCR-110889A GEORGE, KYLE PRASAD

Ky 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.

Rune cc

Ky 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.

Rune cc

Ky 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.

Ky CONDITION SA20 ✓

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

Ky 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

[Signature]
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

Maggie R. Gravel

Judge Presiding

JUN 16 2026

AT 4:57 P M.

Beverly McGraw Walker
CLERK DISTRICT COURT, FORT BEND CO., TX

6

25-DCR-110889A



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGraw Walker
Honorable Beverley McGraw Walker
FORT BEND COUNTY DISTRICT CLERK

CAUSE NO. 25-DCR-110889A

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 FAILURE 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

6116126
DATE

6/16/26
DATE

[Signature]
DEFENDANT

[Signature]
ATTORNEY FOR DEFENDANT

[Signature] #208
SUPERVISION OFFICER

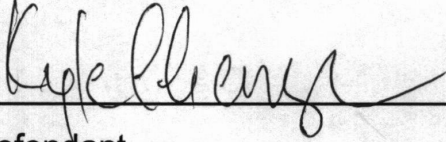
FILED

JUN 16 2026 ²⁰
AT 4:57 P M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



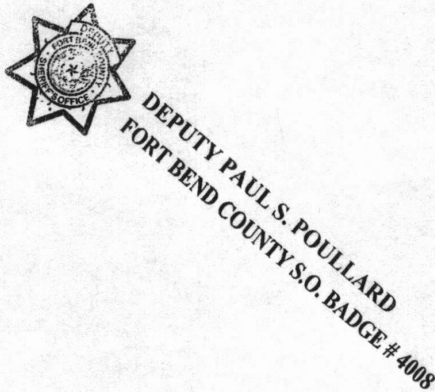
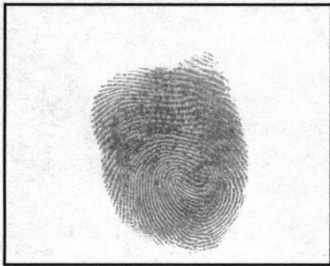
ACKNOWLEDGMENT

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 Syntek / Richard #208



Exhibit N



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverly McGrew Walker
Date Issued:	7/2/2026 2:46:26 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDEBFAJ-BFHAIJA-A
Case Number:	25-DCR-110888A
Case Document:	Notice of Appeal: Notice of Appeal

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



ROUTED TO COURT 6/17/2026 trn
RT'D TO D. CLERK 6/18/26 aa

No. 25-DCR-110888A

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

NOTICE OF APPEAL

TO THE COURT:

Appellant, Kyle Prasad George, hereby give notice of his desire to appeal the final judgment and sentence signed on or about June 16, 2026, by the 458th Judicial District Court of Fort Bend County, Texas, in cause number 25-DCR-110888A, styled *State of Texas v. Kyle Prasad George*.

Appeal is hereby taken to either the First Court of Appeals or the Fourteenth Court of Appeals in Houston, Texas.

This notice of appeal is filed by Appellant, Kyle Prasad George.

Dated: June 16, 2026.

25-DCR-110888A
NOTF 124
Notice
7484715



Respectfully submitted,

/s/Timothy A. Hootman

Timothy A. Hootman

SBN 09965450

2402 Pease St.

Houston, TX 77003

713.366.6229

thootman2000@yahoo.com

ATTORNEY FOR APPELLANT,
KYLE PRASAD GEORGE



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverly McGrew Walker

FORT BEND COUNTY DISTRICT CLERK

CERTIFICATE OF SERVICE

I certify that I have served the forgoing document upon the following attorneys by hand delivery or electronic service to the attorneys for the State of Texas.

Dated: June 16, 2026.

/s/Timothy A. Hootman
Timothy A. Hootman

FILED

JUN 16 2026 *RO*
AT 4:02 P M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



Exhibit O



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:51:00 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDEBEJH-BFHAJAF-A
Case Number:	25-DCR-110889A
Case Document:	Notice of Appeal: Notice of Appeal

HOW TO VERIFY THIS DOCUMENT

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No. 25-DCR-110889A

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

NOTICE OF APPEAL

TO THE COURT:

Appellant, Kyle Prasad George, hereby give notice of his desire to appeal the final judgment and sentence signed on or about June 16, 2026, by the 458th Judicial District Court of Fort Bend County, Texas, in cause number 25-DCR-110889A, styled *State of Texas v. Kyle Prasad George*.

Appeal is hereby taken to either the First Court of Appeals or the Fourteenth Court of Appeals in Houston, Texas.

This notice of appeal is filed by Appellant, Kyle Prasad George.

Dated: June 16, 2026.

Respectfully submitted,

/s/Timothy A. Hootman

Timothy A. Hootman

SBN 09965450

2402 Pease St.

Houston, TX 77003

713.366.6229

thootman2000@yahoo.com

ATTORNEY FOR APPELLANT,
KYLE PRASAD GEORGE

NOTF 62
Notice
7484710



CERTIFICATE OF SERVICE

I certify that I have served the forgoing document upon the following attorneys by hand delivery or electronic service to the attorneys for the State of Texas.

Dated: June 16, 2026.

/s/Timothy A. Hootman
Timothy A. Hootman

FILED
JUN 16 2026 ⁸⁰
AT 4:02 P.M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



Exhibit 2

Original Petition from Roberts's Ouster



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DEGJBCGB-BFHAIEA-D
Case Number:	25-DCV-335003
Case Document:	Petition: Plaintiff's Original Petition

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



Honorable **Beverley McGrew Walker**
PORT BEND COUNTY DISTRICT CLERK

be conducted under a Level 2 Discovery Control Plan.

2. Relator seeks only nonmonetary relief.
3. The subject matter is within the jurisdictional limits of the court.

PARTIES AND SERVICE

4. Relator-Plaintiff, Sarah L. Roberts, is an individual who resides in Fort Bend County, Texas.

5. Defendant K.P. George, is the county judge of Fort Bend County, Texas, is an elected official of the state of Texas. The County Judge position was established in the constitution of Texas. Service of process on the Defendant may be affected under Rule 106 of the Texas Rule of Civil Procedure by delivering a copy to Defendant or by registered or certified mail return receipt requested.

JURISDICTION AND VENUE

6. This court has jurisdiction over the parties because Defendant, resides in the Fort Bend County and purposefully availed himself of the privilege of conducting activities in the State of Texas and established minimum contacts with said forum sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

7. This Court has subject matter jurisdiction pursuant to Section 87.015 of the Texas Local Government Code.

8. Venue is proper in Fort Bend County, Texas pursuant to Texas Local government Code § 87.015 because relator resides in Fort Bend, Texas for more than six months and Defendant is an officer subject to removal in Fort Bend, County.



STANDING

9. By and through Section 87.015(b) of the Texas Local Government Code, a petition for removal of an officer, such as Chief Judge, may be filed by any resident of the county in which the petition is to be filed and has resided within the State of Texas for at least the last six months. Plaintiff has resided in Texas for at least 6 months. Plaintiff also attended Fort Bend County Commissioners Court on July 8th, 2025, where her 1st Amendment rights to free speech were violated as she was cut off by Defendant, K.P. George and escorted out by security.²



FACTS

10. In various mediums, Defendant K.P. George has displayed a series of unprofessional, and inappropriate conduct during the course of his position as Fort Bend County Judge. These actions and misconducts have led to multiple criminal charges, and violations of 1st

² <https://fortbendcountytexas.new.swagit.com/videos/349053>; see time 59:05



Amended rights of Fort Bend County citizens.

11. The defendant, on or about June 7, 2017, used \$5,000 from his campaign account towards a down payment on the purchase of a Ford Expedition, a personal vehicle.

12. Continuously, beginning on or about November 8, 2018, and up until the filing of this petition, the defendant knowingly or recklessly misrepresented his qualifications by stating that he is a Certified Financial Planner (CFP).

13. Hastily, on or about July 15, 2019, the defendant filed a campaign finance report that omitted the \$46,500 in personal expenditures, omitted \$4,000 in campaign contributions, and included a \$3,000 loan repayment that the defendant did not make.

14. Also, on February 26, 2020, the day before initiating divorce proceedings, the defendant moved \$20,000 from his personal (individual) savings account into his campaign account. A few months later, the defendant transferred \$20,000 from his campaign account back to his individual savings account. The defendant omitted both transactions from his campaign finance reports.

15. Services rendered paid with improper funds by the Defendant. Beginning on or about April 3, 2021, and continuing through on or about October 1, 2021, the defendant misused government property by using county funds to pay Taral Patel, a campaign consultant, and/or Sadia Khan, a social media consultant, for services rendered to the defendant's political campaign. The payments were disbursed pursuant to an Agreement for Professional Consulting Services between the Office of the County Judge and a law firm.

16. Stuningly, beginning on or about April 3, 2021, and continuing through on or about April 1, 2022, the defendant conspired with Taral Patel to violate the Hatch Act. Patel, while employed with the federal government, contemporaneously worked on defendant's political



campaign and for the Office of the County Judge. Patel was paid by the County pursuant to an Agreement for the Professional Consulting Services between the Office of the County Judge and a law firm.

17. Beginning on or about April 3, 2021, and continuing through on or about November 6, 2022, the defendant conspired with Taral Patel to misuse government property, namely Fort Bend County property, personnel, and services that came into the defendant's possession by virtue of his office by using them for political advertising, namely the defendant's re-election campaign. The government property included, but was not limited to, employees, interns, money, information, and graphics created for official purposes.

18. On or about November 17, 2021, the defendant requested to pay Hina Qadri, who works directly beneath him, for services rendered to the defendant's political campaign through an Agreement for Professional Services between the Office of the County Judge and a law firm.

19. Beginning on or about April 15, 2022, and continuing through on or about October 1, 2022, the defendant misused government property by using county funds to pay Taral Patel for services rendered to the defendant's political campaign through an Agreement for Professional Services between the Office of the County Judge and DMK & Co. LLC.

20. Beginning on or about April 26, 2022, and continuing through November 28, 2022, the defendant conspired with Taral Patel, his friend and campaign consultant, to disseminate disinformation that benefitted defendant's political campaign or harmed his political opponent's using the alias Antonio Scalywag.

21. Beginning on or about September 18, 2022, and continuing until November 8, 2022, the defendant solicited, encouraged, or directed his campaign consultant, Taral Patel, to post comments on social media that appeared to attack the defendant. Patel posted racist comments



using several aliases including "Richard Melton," "Tim Harrison," and "Antonio Scalywag" and the defendant referenced the comments in a series of campaign communications online and in interviews to accuse his political opponent of being responsible for them.

22. On or about September 21, 2022, the defendant encouraged or directed members of his staff to intentionally conceal, remove, or otherwise impair the legibility or availability of a governmental record, namely Facebook posts by user "Alena Heede" that were posted to the official county government Facebook page.

23. On or about September 24, 2022, the defendant and Taral Patel falsified and disseminated a polling memo that misrepresented the defendants lead over his political opponent. The defendant referenced the memo in campaign communications and used it to mislead voters and to motivate donors to give money to his campaign.

24. On or about September 26, 2022, in Fort Bend County, Texas Kyle KP George acting with intent to promote or assist the commission of Misrepresentation of Identity, a Class A Misdemeanor offense, as described in Section 255.005 of the Texas Election Code, did then and there solicit, encourage, direct, aid, or attempt to aid, Taral Vipul Patel to misrepresent his (Patel's) identity in a campaign communication with intent to injure a candidate or influence the result of an election.

25. On or about July 22, 2023, the defendant offered, or intended to offer, his recommendation on the selection of an architect for a county project from a list of donors who contributed to his political campaign.

26. Upon information and belief, Defendant used campaign funds to purchase multiple properties in Fort Bend, County. Defendant enlisted the help of Jackson Matthey, a realtor, to purchase the properties.



27. On July 8th, 2025, K.P. George, during the routine Fort Bend County Commissioners Court, cut off speaker Sarah L. Roberts, in violation of her 1st Amended Rights. This intentional self-serving act was meant to silence the citizens of Fort Bend County. He then ordered a Fort Bend County Sheriff Deputy to escort her out of Commissioners Court.

28. Finally, on September 16th, 2025, K.P. George, during a recorded and live commissioners court, stated to Ms. Jessie Mathew, "No No No, hold on one second, YOU DON'T HAVE A FIRST AMENDED RIGHT HERE IN THIS COURT ROOM!" Then, presumably, the video Shows K.P. George looking to Commissioner Andy Meyers, asking if there is a 1st Amended Right, to which Commissioner Meyers nods his head. Clearly, K.P. George lacks the knowledge of not only the United States Constitution, but the Texas Constitution, and is portraying extreme mental, and cognitive disabilities in conducting himself.





INCOMPETENCY

29. Relator re-alleges and incorporates paragraphs 1 through 26 as though fully set forth herein.

30. Pursuant to Texas Government Code § 87.013, an officer may be removed for incompetency. Incompetency means:

- a. Gross ignorance of official duties;
- b. Gross carelessness in the discharge of those duties; or
- c. Unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

31. The above referenced conduct by K.P. George indicates either, gross ignorance of his official duties, gross carelessness in the discharge of those duties, or unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the



time of the officer's election.

OFFICIAL MISCONDUCT

32. Relator re-alleges and incorporates paragraphs 1 through 29 as though fully set forth herein.

33. Pursuant to Texas Government Code § 87.013(a)(2), an officer may be removed for official misconduct. Under Section 87.012(3) County Judge is subject to removal under the Texas Government Code. Official Misconduct is defined as "an intentional or corrupt failure, refusal, or neglect of an officer to perform a duty imposed on the officer by law."

34. Defendant KP George repeatedly engaged in intentional conduct as described herein to unlawfully influence the election of the Fort Bend County Commissioners Court.

SUSPENSION PENDING TRIAL - TEMPORARY APPOINTEE

35. Relator incorporates paragraphs 1-32 as though fully set forth below.

36. Relator requests this court immediately hold a hearing to temporarily suspend K.P. George from his duties as County Judge and appoint another person to perform the duties of the office.

37. Section 87.017 allows for suspension of an officer pending trial.

38. After the issuance of the order requiring citation of the officer, the district judge may temporarily suspend the officer and may appoint another person to perform the duties of the office.

39. The judge may not suspend the officer until the person appointed to serve executes a bond, with at least two good and sufficient sureties, in an amount fixed by the judge and conditioned as required by the judge. The bond shall be used to pay damages and costs to the suspended officer if the grounds for removal are found at trial to be insufficient or untrue. In an



action to recover on the bond it is necessary to allege and prove that the temporary appointee actively aided and instigated the filing and prosecution of the removal action. The suspended officer must also serve written notice on the temporary appointee and the appointee's bondsman, within 90 days after the date the bond is executed, stating that the officer intends to hold them liable on the bond and stating the grounds for that liability.

40. If the final judgment establishes the officer's right to the office, the county shall pay the officer from the general fund of the county an amount equal to the compensation received by the temporary appointee.

JURY DEMAND

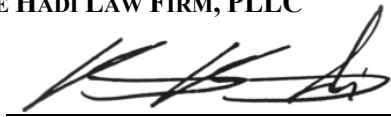
41. Pursuant to Section 87.018 of the Texas Local Government Code, a jury trial is hereby demanded.

PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff, Sarah L. Roberts, respectfully requests this Court enter an order removing K.P. George as County Judge of Fort Bend County and an order for Relator-Plaintiff's costs incurred in this petition. Relator-Plaintiff requests any and all further relief this Court deems just and proper.

Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 

Husein Hadi
Texas Bar No. 24067641
Jamil Thomas
Texas Bar No. 24066914
Ahson B. Wali
Texas Bar No. 24106815
Seve Thomas
Texas Bar No. 24115145



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Attorneys for Relator

RELATOR HEREBY DEMANDS TRIAL BY JURY

DATE FILED: September 17, 2025



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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.

Ahson Wali on behalf of Ahson Wali
Bar No. 24106815
ahson@thehadilawfirm.com
Envelope ID: 105721115
Filing Code Description: Petition
Filing Description: Plaintiff's Original Petition
Status as of 9/17/2025 5:09 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	9/17/2025 3:02:01 PM	NOT SENT

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:09 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit 3

First Amended Petition from Roberts's Ouster



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:07 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DEGJEGFJ-BFHAIDG-F
Case Number:	25-DCV-335003
Case Document:	Amended Filing: Plaintiff's First Amended Petition

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



NO. 25-DCV-335003

SARAH L. ROBERTS,	§	IN THE DISTRICT COURT
Relator-Plaintiff,	§	
V.	§	
	§	
	§	
	§	400TH JUDICIAL DISTRICT
	§	
K.P. GEORGE,	§	
In his Official Capacity as County	§	OF FORT BEND COUNTY, TEXAS
Judge of Fort Bend County, Texas	§	

PLAINTIFF'S FIRST AMENDED PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Sarah L. Roberts, hereinafter called Relator-Plaintiff, complains of and about Kyle Prasad "K.P." George, (Hereinafter K.P. George), in his official capacity as Chief Judge of Fort Bend County, hereinafter called Defendant, and brings this action under Chapter 87 of the Local Government Code. In support of this First Amended Petition, Relator-Plaintiff would show unto the Court the following:

K.P. GEORGE HAS VIOLATED THE 1ST AMENDED RIGHTS OF TWO CITIZEN OF FORT BEND COUTNY, TEXAS, AS OF SEPTEMBER 16TH, 2025. THE FIRST, PLAINTIFF SARAH L. ROBERTS ON JULY 8TH, 2025, AND THE SECOND, MS. JESSIE MATHEW ON SEPTEMBER 16TH, 2025.¹

¹ <https://fortbendcountytexas.new.swagit.com/videos/355631>; see time 49:23.



DISCOVERY CONTROL PLAN LEVEL

1. Pursuant to the Texas Rules of Civil Procedure Plaintiff intends that discovery be conducted under a Level 2 Discovery Control Plan.
2. Relator seeks only nonmonetary relief.
3. The subject matter is within the jurisdictional limits of the court.

PARTIES AND SERVICE

4. Relator-Plaintiff, Sarah L. Roberts, is an individual who resides in Fort Bend County, Texas.
5. Defendant Kyle Prasad "K.P." George, is the county judge of Fort Bend County, Texas, is an elected official of the state of Texas. The County Judge position was established in the constitution of Texas. Service of process on the Defendant may be affected under Rule 106 of the Texas Rule of Civil Procedure by delivering a copy to Defendant or by registered or certified mail return receipt requested.

JURISDICTION AND VENUE

6. This court has jurisdiction over the parties because Defendant, resides in the Fort Bend County and purposefully availed himself of the privilege of conducting activities in the State of Texas and established minimum contacts with said forum sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.
7. This Court has subject matter jurisdiction pursuant to Section 87.015 of the Texas Local Government Code.
8. Venue is proper in Fort Bend County, Texas pursuant to Texas Local government



Code § 87.015 because relator resides in Fort Bend, Texas for more than six months and Defendant is an officer subject to removal in Fort Bend, County.

STANDING

9. By and through Section 87.015(b) of the Texas Local Government Code, a petition for removal of an officer, such as Chief Judge, may be filed by any resident of the county in which the petition is to be filed and has resided within the State of Texas for at least the last six months. Plaintiff has resided in Texas for at least 6 months. Plaintiff also attended Fort Bend County Commissioners Court on July 8th, 2025, where her 1st Amendment rights to free speech were violated as she was cut off by Defendant, K.P. George and escorted out by security.²



FACTS

10. In various mediums, Defendant K.P. George has displayed a series of

² <https://fortbendcountytexas.new.swagit.com/videos/349053>; see time 59:05



unprofessional, and inappropriate conduct during the course of his position as Fort Bend County Judge. These actions and misconducts have led to multiple criminal charges, and violations of 1st Amended rights of Fort Bend County citizens.

11. The defendant, on or about June 7, 2017, used \$5,000 from his campaign account towards a down payment on the purchase of a Ford Expedition, a personal vehicle.

12. Continuously, beginning on or about November 8, 2018, and up until the filing of this petition, the defendant knowingly or recklessly misrepresented his qualifications by stating that he is a Certified Financial Planner (CFP).

13. Hastily, on or about July 15, 2019, the defendant filed a campaign finance report that omitted the \$46,500 in personal expenditures, omitted \$4,000 in campaign contributions, and included a \$3,000 loan repayment that the defendant did not make.

14. Also, on February 26, 2020, the day before initiating divorce proceedings, the defendant moved \$20,000 from his personal (individual) savings account into his campaign account. A few months later, the defendant transferred \$20,000 from his campaign account back to his individual savings account. The defendant omitted both transactions from his campaign finance reports.

15. Services rendered paid with improper funds by the Defendant. Beginning on or about April 3, 2021, and continuing through on or about October 1, 2021, the defendant misused government property by using county funds to pay Taral Patel, a campaign consultant, and/or Sadia Khan, a social media consultant, for services rendered to the defendant's political campaign. The payments were disbursed pursuant to an Agreement for Professional Consulting Services between the Office of the County Judge and a law firm.

16. Stunningly, beginning on or about April 3, 2021, and continuing through on or



about April 1, 2022, the defendant conspired with Taral Patel to violate the Hatch Act. Patel, while employed with the federal government, contemporaneously worked on defendant's political campaign and for the Office of the County Judge. Patel was paid by the County pursuant to an Agreement for the Professional Consulting Services between the Office of the County Judge and a law firm.

17. Beginning on or about April 3, 2021, and continuing through on or about November 6, 2022, the defendant conspired with Taral Patel to misuse government property, namely Fort Bend County property, personnel, and services that came into the defendant's possession by virtue of his office by using them for political advertising, namely the defendant's re-election campaign. The government property included, but was not limited to, employees, interns, money, information, and graphics created for official purposes.

18. On or about November 17, 2021, the defendant requested to pay Hina Qadri, who works directly beneath him, for services rendered to the defendant's political campaign through an Agreement for Professional Services between the Office of the County Judge and a law firm.

19. Beginning on or about April 15, 2022, and continuing through on or about October 1, 2022, the defendant misused government property by using county funds to pay Taral Patel for services rendered to the defendant's political campaign through an Agreement for Professional Services between the Office of the County Judge and DMK & Co. LLC.

20. Beginning on or about April 26, 2022, and continuing through November 28, 2022, the defendant conspired with Taral Patel, his friend and campaign consultant, to disseminate disinformation that benefitted defendant's political campaign or harmed his political opponent's using the alias Antonio Scalywag.

21. Beginning on or about September 18, 2022, and continuing until November 8,



2022, the defendant solicited, encouraged, or directed his campaign consultant, Taral Patel, to post comments on social media that appeared to attack the defendant. Patel posted racist comments using several aliases including "Richard Melton," "Tim Harrison," and "Antonio Scalywag" and the defendant referenced the comments in a series of campaign communications online and in interviews to accuse his political opponent of being responsible for them.

22. On or about September 21, 2022, the defendant encouraged or directed members of his staff to intentionally conceal, remove, or otherwise impair the legibility or availability of a governmental record, namely Facebook posts by user "Alena Heede" that were posted to the official county government Facebook page.

23. On or about September 24, 2022, the defendant and Taral Patel falsified and disseminated a polling memo that misrepresented the defendants lead over his political opponent. The defendant referenced the memo in campaign communications and used it to mislead voters and to motivate donors to give money to his campaign.

24. On or about September 26, 2022, in Fort Bend County, Texas Kyle KP George acting with intent to promote or assist the commission of Misrepresentation of Identity, a Class A Misdemeanor offense, as described in Section 255.005 of the Texas Election Code, did then and there solicit, encourage, direct, aid, or attempt to aid, Taral Vipul Patel to misrepresent his (Patel's) identity in a campaign communication with intent to injure a candidate or influence the result of an election.

25. On or about July 22, 2023, the defendant offered, or intended to offer, his recommendation on the selection of an architect for a county project from a list of donors who contributed to his political campaign.

26. Upon information and belief, Defendant used campaign funds to purchase multiple



properties in Fort Bend, County. Defendant enlisted the help of Jackson Matthey, a realtor, to purchase the properties.

27. On July 8th, 2025, K.P. George, during the routine Fort Bend County Commissioners Court, cut off speaker Sarah L. Roberts, in violation of her 1st Amended Rights. This intentional self-serving act was meant to silence the citizens of Fort Bend County. He then ordered a Fort Bend County Sheriff Deputy to escort her out of Commissioners Court.

28. Finally, on September 16th, 2025, K.P. George, during a recorded and live commissioners court, stated to Ms. Jessie Mathew, "No No No, hold on one second, YOU DON'T HAVE A FIRST AMENDED RIGHT HERE IN THIS COURT ROOM!" Then, presumably, the video Shows K.P. George looking to Commissioner Andy Meyers, asking if there is a 1st Amended Right, to which Commissioner Meyers nods his head. Clearly, K.P. George lacks the knowledge of not only the United States Constitution, but the Texas Constitution, and is portraying extreme mental, and cognitive disabilities in conducting himself.





INCOMPETENCY

29. Relator re-alleges and incorporates paragraphs 1 through 28 as though fully set forth herein.

30. Pursuant to Texas Government Code § 87.013, an officer may be removed for incompetency. Incompetency means:

- a. Gross ignorance of official duties;
- b. Gross carelessness in the discharge of those duties; or
- c. Unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.



31. The above referenced conduct by K.P. George indicates either, gross ignorance of his official duties, gross carelessness in the discharge of those duties, or unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

OFFICIAL MISCONDUCT

32. Relator re-alleges and incorporates paragraphs 1 through 31 as though fully set forth herein.

33. Pursuant to Texas Government Code § 87.013(a)(2), an officer may be removed for official misconduct. Under Section 87.012(3) County Judge is subject to removal under the Texas Government Code. Official Misconduct is defined as "an intentional or corrupt failure, refusal, or neglect of an officer to perform a duty imposed on the officer by law."

34. Defendant KP George repeatedly engaged in intentional conduct as described herein to unlawfully influence the election of the Fort Bend County Commissioners Court.

SUSPENSION PENDING TRIAL - TEMPORARY APPOINTEE

35. Relator incorporates paragraphs 1 through 34 as though fully set forth below.

36. Relator requests this court immediately hold a hearing to temporarily suspend K.P. George from his duties as County Judge and appoint another person to perform the duties of the office.

37. Section 87.017 allows for suspension of an officer pending trial.

38. After the issuance of the order requiring citation of the officer, the district judge may temporarily suspend the officer and may appoint another person to perform the duties of the office.

39. The judge may not suspend the officer until the person appointed to serve executes



a bond, with at least two good and sufficient sureties, in an amount fixed by the judge and conditioned as required by the judge. The bond shall be used to pay damages and costs to the suspended officer if the grounds for removal are found at trial to be insufficient or untrue. In an action to recover on the bond it is necessary to allege and prove that the temporary appointee actively aided and instigated the filing and prosecution of the removal action. The suspended officer must also serve written notice on the temporary appointee and the appointee's bondsman, within 90 days after the date the bond is executed, stating that the officer intends to hold them liable on the bond and stating the grounds for that liability.

40. If the final judgment establishes the officer's right to the office, the county shall pay the officer from the general fund of the county an amount equal to the compensation received by the temporary appointee.

JURY DEMAND

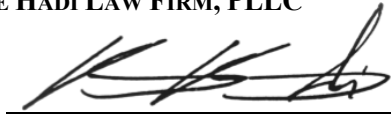
41. Pursuant to Section 87.018 of the Texas Local Government Code, a jury trial is hereby demanded.

PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff, Sarah L. Roberts, respectfully requests this Court enter an order removing Kyle Prasad "K.P." George as County Judge of Fort Bend County and an order for Relator-Plaintiff's costs incurred in this petition. Relator-Plaintiff requests any and all further relief this Court deems just and proper.

Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 

Husein Hadi

Texas Bar No. 24067641



Jamil Thomas
Texas Bar No. 24066914
Ahson B. Wali
Texas Bar No. 24106815
Seve Thomas
Texas Bar No. 24115145
Nicholas Thomas
Texas Bar No. 24140421
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Fax: (855) 423-4529
litigation@thehadilawfirm.com
Attorneys for Relator

RELATOR HEREBY DEMANDS TRIAL BY JURY

DATE FILED: September 17, 2025



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Automated Certificate of eService

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Ahson Wali on behalf of Ahson Wali
Bar No. 24106815
ahson@thehadilawfirm.com
Envelope ID: 105738884
Filing Code Description: Amended Filing
Filing Description: Plaintiff's First Amended Petition
Status as of 9/18/2025 10:40 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	9/17/2025 5:47:06 PM	SENT

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:07 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit 4

Second Amended Petition from Roberts's Ouster



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFAJFCDB-BFHAIDI-H
Case Number:	25-DCV-335003
Case Document:	Amended Filing: Plaintiff's Second Amended Petition

HOW TO VERIFY THIS DOCUMENT

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PLAINTIFF'S SECOND AMENDED PETITION

Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

be conducted under a Level 2 Discovery Control Plan.

PARTIES AND SERVICE

2. Relator-Plaintiff, Sarah L. Roberts, is an individual who resides in Fort Bend County, Texas.

3. Defendant K.P. George is the county judge of Fort Bend County, Texas, is an elected official of the state of Texas. The County Judge position was established in the constitution of Texas. Service may be affected under Section 87.016 of Texas Local Government Code by filing an application with the district judge for an order requiring a citation and a certified copy of the petition to be served on the officer. Plaintiff requests that the Court order that summons be issued and a certified copy of Plaintiff's Second Amended Petition also issue for service on Defendant.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the parties because Defendant resides in the Fort Bend County, Texas and purposefully availed himself of the privilege of conducting activities in the State of Texas and established minimum contacts with said forum sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

5. This Court has subject matter jurisdiction pursuant to Section 87.015 of the Texas Local Government Code.

6. Venue is proper in Fort Bend County, Texas pursuant to Texas Local government Code § 87.015 because relator is a resident of Texas and has resided in Fort Bend County, Texas for more than six months. Further, Relator is not under any indictment and Defendant is an officer



subject to removal in Fort Bend County, Texas.

STANDING

7. By and through Section 87.015(b) of the Texas Local Government Code, a petition for removal of an officer, such as Chief Judge, may be filed by any resident of the county in which the petition is to be filed and has resided within the State of Texas and in Fort Bend County for at least six months. The Plaintiff also affirms that she is not under any indictment within the county or any other place. Plaintiff swears to these facts by affidavit attached as Exhibit 1. Exhibit 1 is incorporated by reference herein. Plaintiff attended Fort Bend County Commissioners Court on July 8, 2025, where her 1st Amendment rights to free speech were violated as she was cut off by Defendant, K.P. George and escorted out by security.²



FACTS

² <https://fortbendcountytexas.new.swagit.com/videos/349053>; see time 59:05



8. In various mediums, Defendant K.P. George has displayed a series of unprofessional, and inappropriate conduct during the course of his position as Fort Bend County Judge. These actions and misconducts have led to multiple criminal charges, and violations of 1st Amendment rights of Fort Bend County citizens.

9. The Defendant, on or about June 7, 2017, used \$5,000 from his campaign account towards a down payment on the purchase of a Ford Expedition, a personal vehicle.

10. Continuously, beginning on or about November 8, 2018, and up until the filing of this suit, the Defendant knowingly or recklessly misrepresented his qualifications by stating that he is a Certified Financial Planner (CFP).

11. Hastily, on or about July 15, 2019, the Defendant filed a campaign finance report that omitted the \$46,500 in personal expenditures, omitted \$4,000 in campaign contributions, and included a \$3,000 loan repayment that the Defendant did not make.

12. Also, on February 26, 2020, the day before initiating divorce proceedings, the Defendant moved \$20,000 from his personal (individual) savings account into his campaign account. A few months later, the Defendant transferred \$20,000 from his campaign account back to his individual savings account. The Defendant omitted both transactions from his campaign finance reports.

13. Services rendered paid with improper funds by the Defendant. Beginning on or about April 3, 2021, and continuing through on or about October 1, 2021, the Defendant misused government property by using county funds to pay Taral Patel, a campaign consultant, and/or Sadia Khan, a social media consultant, for services rendered to the Defendant's political campaign. The payments were disbursed pursuant to an Agreement for Professional Consulting Services between the Office of the County Judge and a law firm.



14. Stunningly, beginning on or about April 3, 2021, and continuing through on or about April 1, 2022, the Defendant conspired with Taral Patel to violate the Hatch Act. Patel, while employed with the federal government, contemporaneously worked on Defendant's political campaign and for the Office of the County Judge. Patel was paid by the County pursuant to an agreement for professional consulting services between the Office of the County Judge and a law firm.

15. Beginning on or about April 3, 2021, and continuing through on or about November 6, 2022, the Defendant conspired with Taral Patel to misuse government property, namely Fort Bend County property, personnel, and services that came into the Defendant's possession by virtue of his office by using them for political advertising, namely the Defendant's re-election campaign. The government property included, but was not limited to, employees, interns, money, information, and graphics created for official purposes.

16. On or about November 17, 2021, the Defendant requested to pay Hina Qadri, who works directly beneath him, for services rendered to the Defendant's political campaign through an agreement for professional services between the Office of the County Judge and a law firm.

17. Beginning on or about April 15, 2022, and continuing through on or about October 1, 2022, the Defendant misused government property by using county funds to pay Taral Patel for services rendered to the Defendant's political campaign through an agreement for professional services between the Office of the County Judge and DMK & Co. LLC.

18. Beginning on or about April 26, 2022, and continuing through November 28, 2022, the Defendant conspired with Taral Patel, his friend and campaign consultant, to disseminate disinformation that benefitted Defendant's political campaign or harmed his political opponent's using the alias Antonio Scalywag.



19. Beginning on or about September 18, 2022, and continuing until November 8, 2022, the Defendant solicited, encouraged, or directed his campaign consultant, Taral Patel, to post comments on social media that appeared to attack the Defendant. Patel posted racist comments using several aliases including "Richard Melton," "Tim Harrison," and "Antonio Scalywag" and the Defendant referenced the comments in a series of campaign communications online and in interviews to accuse his political opponent of being responsible for them.

20. On or about September 21, 2022, the Defendant encouraged or directed members of his staff to intentionally conceal, remove, or otherwise impair the legibility or availability of a governmental record, namely Facebook posts by user "Alena Heede" that were posted to the official county government Facebook page.

21. On or about September 24, 2022, the Defendant and Taral Patel falsified and disseminated a polling memo that misrepresented the Defendant's lead over his political opponent. Defendant referenced the memo in campaign communications and used it to mislead voters and to motivate donors to give money to his campaign.

22. On or about September 26, 2022, in Fort Bend County, Texas Defendant K.P. George, acting with intent to promote or assist the commission of Misrepresentation of Identity, a Class A Misdemeanor offense, as described in Section 255.005 of the Texas Election Code, did then and there solicit, encourage, direct, aid, or attempt to aid, Taral Vipul Patel to misrepresent his (Patel's) identity in a campaign communication with intent to injure a candidate or influence the result of an election.

23. On or about July 22, 2023, the Defendant offered, or intended to offer, his recommendation on the selection of an architect for a county project from a list of donors who contributed to his political campaign.



24. Upon information and belief, Defendant used campaign funds to purchase multiple properties in Fort Bend, County. Defendant enlisted the help of Jackson Matthew, a realtor, to purchase the properties.

25. On July 8, 2025, Defendant K.P. George, during the routine Fort Bend County Commissioners Court, cut off speaker Sarah L. Roberts, in violation of her 1st Amendment Rights. This intentional self-serving act was meant to silence the citizens of Fort Bend County. He then ordered a Fort Bend County Sheriff Deputy to escort her out of Commissioners Court.

26. Finally, on September 16, 2025, Defendant K.P. George, during a recorded and live commissioners court, stated to Ms. Jessie Mathew, “No No No, hold on one second, YOU DON’T HAVE A FIRST AMENDMENT RIGHT HERE IN THIS COURT ROOM!” Then, presumably, the video shows Defendant K.P. George looking to Commissioner Andy Meyers, asking if there is a 1st Amendment Right, to which Commissioner Meyers nods his head. Clearly, Defendant K.P. George lacks the knowledge of not only the United States Constitution, but the Texas Constitution, and is portraying extreme mental, and cognitive disabilities in conducting himself.





INCOMPETENCY

27. Relator re-alleges and incorporates paragraphs 1 through 26 as though fully set forth herein.

28. Pursuant to Texas Government Code § 87.013, an officer may be removed for incompetency. Incompetency means:

- a. Gross ignorance of official duties;
- b. Gross carelessness in the discharge of those duties; or
- c. Unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.



29. The above referenced conduct by Defendant K.P. George indicates either, gross ignorance of his official duties, gross carelessness in the discharge of those duties, or unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

OFFICIAL MISCONDUCT

30. Relator re-alleges and incorporates paragraphs 1 through 29 as though fully set forth herein.

31. Pursuant to Texas Government Code § 87.013(a)(2), an officer may be removed for official misconduct. Under Section 87.012(3) County Judge is subject to removal under the Texas Government Code. Official Misconduct is defined as "an intentional or corrupt failure, refusal, or neglect of an officer to perform a duty imposed on the officer by law."

32. Defendant K.P. George repeatedly engaged in intentional conduct as described herein to unlawfully influence the election of the Fort Bend County Commissioners Court.

SUSPENSION PENDING TRIAL - TEMPORARY APPOINTEE

33. Relator incorporates paragraphs 1-32 as though fully set forth below.

34. Relator requests this court immediately hold a hearing to temporarily suspend Defendant K.P. George from his duties as County Judge and appoint another person to perform the duties of the office.

35. Section 87.017 allows for suspension of an officer pending trial.

36. After the issuance of the order requiring citation of the officer, the district judge may temporarily suspend the officer and may appoint another person to perform the duties of the office.

37. The judge may not suspend the officer until the person appointed to serve executes



a bond, with at least two good and sufficient sureties, in an amount fixed by the judge and conditioned as required by the judge. The bond shall be used to pay damages and costs to the suspended officer if the grounds for removal are found at trial to be insufficient or untrue. In an action to recover on the bond it is necessary to allege and prove that the temporary appointee actively aided and instigated the filing and prosecution of the removal action. The suspended officer must also serve written notice on the temporary appointee and the appointee's bondsman, within 90 days after the date the bond is executed, stating that the officer intends to hold them liable on the bond and stating the grounds for that liability.

38. If the final judgment establishes the officer's right to the office, the county shall pay the officer from the general fund of the county an amount equal to the compensation received by the temporary appointee.

JURY DEMAND

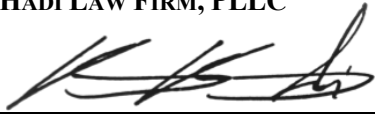
39. Pursuant to Section 87.018 of the Texas Local Government Code, a jury trial is hereby demanded.

PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff, Sarah L. Roberts, respectfully requests this Court enter an order removing Defendant K.P. George as County Judge of Fort Bend County and an order for Relator-Plaintiff's costs incurred in this petition. Relator-Plaintiff requests any and all further relief this Court deems just and proper.

Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 
 Husein Hadi
 Texas Bar No. 24067641



Jamil Thomas
Texas Bar No. 24066914
Ahson B. Wali
Texas Bar No. 24106815
Seve Thomas
Texas Bar No. 24115145
Nicholas Thomas
Texas Bar No. 24140421
Sedrick Stagg
Texas Bar No. 24102815
7100 Regency Square Boulevard, Suite 140
Houston, Texas 77036
Tel: (832) 433-7977
Fax: (855) 423-4529
litigation@thehadilawfirm.com
Attorneys for Relator

RELATOR HEREBY DEMANDS TRIAL BY JURY

DATE FILED: November 21, 2025



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

EXHIBIT 1



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

NO. 25-DCV-335003

SARAH L. ROBERTS
Relator-Plaintiff,

V.

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

§
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IN THE DISTRICT COURT

400th JUDICIAL DISTRICT

FORT BEND COUNTY, TEXAS

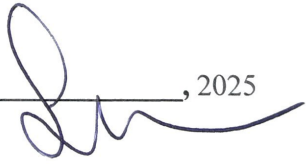
AFFIDAVIT OF SARAH L. ROBERTS

Before me, the undersigned authority, on this day personally appeared Sarah Roberts who swore under oath that the following facts are true:

“My name is Sarah L. Roberts. I am over 18 years of age and of sound mind and fully competent to make this affidavit. I am a resident of Texas. I reside in Fort Bend County, Texas and have resided in Fort Bend County, Texas for at least six months. I am not currently under indictment in the county or anywhere else.”

Further, affiant sayeth not.

Signed on November 21st, 2025



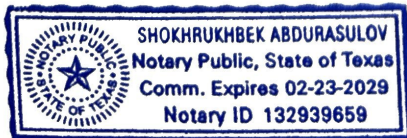
Sarah L. Roberts

SUBSCRIBED AND SWORN TO before me on November 21st 2025
by the above Sarah L. Roberts



Notary Public in and for
The State of Texas

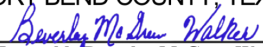
My Commission Expires: 02/23/2029



1



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS



Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

CERTIFICATE OF SERVICE

Undersigned counsel hereby affirms that the foregoing was served on all parties and their counsel who have entered their appearances herein.



Attorney for Plaintiff



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.

Ahson Wali on behalf of Ahson Wali
Bar No. 24106815
ahson@thehadilawfirm.com
Envelope ID: 108348993
Filing Code Description: Amended Filing
Filing Description: Plaintiff's Second Amended Petition
Status as of 11/21/2025 3:26 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	11/21/2025 3:09:22 PM	SENT
Jared Woodfill		woodfillservice@gmail.com	11/21/2025 3:09:22 PM	SENT

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:08 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit 5

Third Amended Petition from Roberts's Ouster



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFBBDHJB-BFHAI DH-C
Case Number:	25-DCV-335003
Case Document:	Amended Filing: Plaintiff's Third Amended Petition

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



[illegible]

TO THE HONORABLE JUDGE OF SAID COURT:

K.P. GEORGE HAS VIOLATED THE 1ST AMENDMENT RIGHTS OF TWO CITIZENS OF FORT BEND COUNTY, TEXAS, AS OF SEPTEMBER 16, 2025. THE FIRST, IS PLAINTIFF SARAH L. ROBERTS ON JULY 8, 2025, AND THE SECOND, IS A WOMAN NAMED MS. JESSIE MATHEW ON SEPTEMBER 16, 2025.¹

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Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

DISCOVERY CONTROL PLAN LEVEL

1. Pursuant to the Texas Rules of Civil Procedure Plaintiff intends that discovery be conducted under a Level 2 Discovery Control Plan.

PARTIES AND SERVICE

2. Relator-Plaintiff, Sarah L. Roberts, is an individual who resides in Fort Bend County, Texas.

3. Defendant K.P. George is the county judge of Fort Bend County, Texas, is an elected official of the state of Texas. The County Judge position was established in the constitution of Texas. Service may be affected under Section 87.016 of Texas Local Government Code by filing an application with the district judge for an order requiring a citation and a certified copy of the petition to be served on the officer. Plaintiff requests that the Court order that summons be issued and a certified copy of Plaintiff's Second Amended Petition also issue for service on Defendant.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the parties because Defendant resides in the Fort Bend County, Texas and purposefully availed himself of the privilege of conducting activities in the State of Texas and established minimum contacts with said forum sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

5. This Court has subject matter jurisdiction pursuant to Section 87.015 of the Texas Local Government Code.

6. Venue is proper in Fort Bend County, Texas pursuant to Texas Local government



Code § 87.015 because relator is a resident of Texas and has resided in Fort Bend County, Texas for more than six months. Further, Relator is not under any indictment and Defendant is an officer subject to removal in Fort Bend County, Texas.

STANDING

7. By and through Section 87.015(b) of the Texas Local Government Code, a petition for removal of an officer, such as Chief Judge, may be filed by any resident of the county in which the petition is to be filed and has resided within the State of Texas and in Fort Bend County for at least six months. The Plaintiff also affirms that she is not under any indictment within the county or any other place. Plaintiff swears to these facts by affidavit attached as Exhibit 1. Exhibit 1 is incorporated by reference herein. Plaintiff attended Fort Bend County Commissioners Court on July 8, 2025, where her 1st Amendment rights to free speech were violated as she was cut off by Defendant, K.P. George and escorted out by security.²

² <https://fortbendcountytexas.new.swagit.com/videos/349053>; see time 59:05





FACTS

8. In various mediums, Defendant K.P. George has displayed a series of unprofessional, and inappropriate conduct during the course of his position as Fort Bend County Judge. These actions and misconduct have led to multiple criminal charges, and violations of 1st Amendment rights of Fort Bend County citizens.

9. On July 8, 2025, Defendant K.P. George, during a session of Fort Bend County Commissioners Court, cut off speaker Sarah L. Roberts, in violation of her 1st Amendment Rights. This intentional self-serving act was meant to silence the citizens of Fort Bend County, Texas. He then ordered a Fort Bend County Sheriff Deputy to escort her out of Commissioners Court.

10. On September 16, 2025, Defendant K.P. George, during a recorded and live commissioners court, stated to Ms. Jessie Mathew, “No No No, hold on one second, YOU DON’T HAVE A FIRST AMENDMENT RIGHT HERE IN THIS COURT ROOM!” Then, the video



appears shows Defendant K.P. George looking to Commissioner Andy Meyers, asking if there is a 1st Amendment Right, to which Commissioner Meyers nods his head. Clearly, Defendant K.P. George lacks the knowledge of not only the United States Constitution, but the Texas Constitution, and is portraying extreme mental, and cognitive disabilities in conducting himself.



INCOMPETENCY

11. Relator re-alleges and incorporates paragraphs 1 through 10 as though fully set forth herein.

12. Pursuant to Texas Government Code § 87.013, an officer may be removed for incompetency. Incompetency means:

- a. Gross ignorance of official duties;



- b. Gross carelessness in the discharge of those duties; or
- c. Unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

13. The above referenced conduct by Defendant K.P. George indicates either, gross ignorance of his official duties, gross carelessness in the discharge of those duties, or unfitness or inability to promptly and properly discharge official duties because of a serious physical or mental defect that did not exist at the time of the officer's election.

OFFICIAL MISCONDUCT

14. Relator re-alleges and incorporates paragraphs 1 through 13 as though fully set forth herein.

15. Pursuant to Texas Government Code § 87.013(a)(2), an officer may be removed for official misconduct. Under Section 87.012(3) County Judge is subject to removal under the Texas Government Code. Official Misconduct is defined as "an intentional or corrupt failure, refusal, or neglect of an officer to perform a duty imposed on the officer by law."

16. Defendant K.P. George repeatedly engaged in intentional conduct as described herein to unlawfully influence the election of the Fort Bend County Commissioners Court.

SUSPENSION PENDING TRIAL - TEMPORARY APPOINTEE

17. Relator incorporates paragraphs 1-16 as though fully set forth below.

18. Relator requests this court immediately hold a hearing to temporarily suspend Defendant K.P. George from his duties as County Judge and appoint another person to perform the duties of the office.

19. Section 87.017 allows for suspension of an officer pending trial.



20. After the issuance of the order requiring citation of the officer, the district judge may temporarily suspend the officer and may appoint another person to perform the duties of the office.

21. The judge may not suspend the officer until the person appointed to serve executes a bond, with at least two good and sufficient sureties, in an amount fixed by the judge and conditioned as required by the judge. The bond shall be used to pay damages and costs to the suspended officer if the grounds for removal are found at trial to be insufficient or untrue. In an action to recover on the bond it is necessary to allege and prove that the temporary appointee actively aided and instigated the filing and prosecution of the removal action. The suspended officer must also serve written notice on the temporary appointee and the appointee's bondsman, within 90 days after the date the bond is executed, stating that the officer intends to hold them liable on the bond and stating the grounds for that liability.

22. If the final judgment establishes the officer's right to the office, the county shall pay the officer from the general fund of the county an amount equal to the compensation received by the temporary appointee.

JURY DEMAND

23. Pursuant to Section 87.018 of the Texas Local Government Code, a jury trial is hereby demanded.

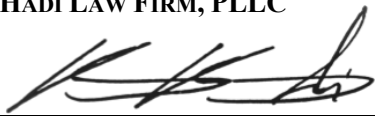
PRAYER

WHEREFORE PREMISES CONSIDERED, Plaintiff, Sarah L. Roberts, respectfully requests this Court enter an order removing Defendant K.P. George as County Judge of Fort Bend County and an order for Relator-Plaintiff's costs incurred in this petition. Relator-Plaintiff requests any and all further relief this Court deems just and proper.



Respectfully submitted,

THE HADI LAW FIRM, PLLC

By: 
Husein Hadi
Texas Bar No. 24067641
Jamil Thomas
Texas Bar No. 24066914
Ahson B. Wali
Texas Bar No. 24106815
Seve Thomas
Texas Bar No. 24115145
Nicholas Thomas
Texas Bar No. 24140421
Sedrick Staggs
Texas Bar No. 24102815
7100 Regency Square Boulevard, Suite 140
Houston, Texas 77036
Tel: (832) 433-7977
Fax: (855) 423-4529
litigation@thehadilawfirm.com
Attorneys for Relator

RELATOR HEREBY DEMANDS TRIAL BY JURY

DATE FILED: November 25, 2025



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

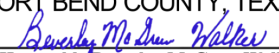

Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

EXHIBIT 1



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

NO. 25-DCV-335003

SARAH L. ROBERTS
Relator-Plaintiff,

V.

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

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IN THE DISTRICT COURT

400th JUDICIAL DISTRICT

FORT BEND COUNTY, TEXAS

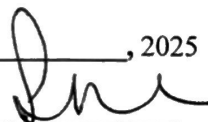
AFFIDAVIT OF SARAH L. ROBERTS

Before me, the undersigned authority, on this day personally appeared Sarah Roberts who swore under oath that the following facts are true:

"My name is Sarah L. Roberts. I am over 18 years of age and of sound mind and fully competent to make this affidavit. I am a resident of Texas. I reside in Fort Bend County, Texas and have resided in Fort Bend County, Texas for at least six months. I am not currently under indictment in the county or anywhere else. I have read the contents of the Third Amended Petition and I affirm under the penalty of perjury that the Third Amended Petition is true and correct."

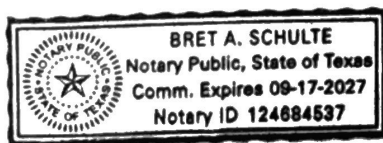
Further, affiant sayeth not.

Signed on November 25, _____, 2025


Sarah L. Roberts

SUBSCRIBED AND SWORN TO before me on November 25, 2025

by the above Sarah L. Roberts

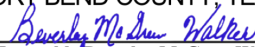



Notary Public in and for Texas

1



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS


Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

CERTIFICATE OF SERVICE

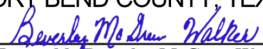
Undersigned counsel hereby affirms that the foregoing was served on all parties and their counsel who have entered their appearances herein.



Attorney for Plaintiff



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS


Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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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.

Ahson Wali on behalf of Ahson Wali
Bar No. 24106815
ahson@thehadilawfirm.com
Envelope ID: 108465602
Filing Code Description: Amended Filing
Filing Description: Plaintiff's Third Amended Petition
Status as of 11/25/2025 4:48 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Husein Hadi		litigation@thehadilawfirm.com	11/25/2025 3:19:09 PM	SENT
Jared Woodfill		woodfillservice@gmail.com	11/25/2025 3:19:09 PM	SENT

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:08 PM

Beverly McGrew Walker
25-D CV-335003, 7/2/2026 2:34:08 PM

The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit 6

Void Order from Roberts's Ouster



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:31:46 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFJAHHEH-BFHAICJ-J
Case Number:	25-DCV-335003
Case Document:	Order: Order

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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

JUDGE JETH JONES
400th JUDICIAL DISTRICT
JUDGE PRESIDING

FILED

APR 10 2026

AT 11:54 PM

CLERK DISTRICT COURT, FORT BEND CO., TX

I, BEVERLEY MCGREW WALKER, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-DCV-335003, 7/2/2026 2:31:46 PM

The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit 7

Notice of Nonsuit from Roberts's Ouster



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDEIJIE-BFHAIDJ-G
Case Number:	25-DCV-335003
Case Document:	Motion (No Fee): Notice of Nonsuit

HOW TO VERIFY THIS DOCUMENT

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Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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@thehadilawfirm.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

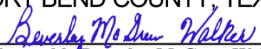
Jared R. Woodfill
woodfillservice@gmail.com
5850 San Felipe, 5th Floor
Houston, TX 77057
Tel: (713) 751-3080
ATTORNEYS FOR K. P. George

By: _____

Husein Hadi



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS


Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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

I, **BEVERLEY MCGREW WALKER**, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-D CV-335003, 7/2/2026 2:34:08 PM

Beverly McGrew Walker

The Honorable Beverley McGrew Walker
 FORT BEND COUNTY DISTRICT CLERK

Exhibit 8

Order Granting Nonsuit from Roberts's Ouster



Electronically Certified Court Record

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:34:08 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDGFJCH-BFHAIEB-G
Case Number:	25-DCV-335003
Case Document:	Dismissed by Plaintiff/Non-Suit/Other: Order Granting Notic

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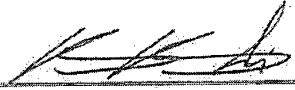


Beverley McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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 Staggs

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

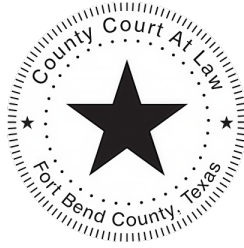
litigation@thehadilawfirm.com

Attorneys for Plaintiffs



Exhibit 9

Indictment from Misdemeanor Charge



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County Clerk
County Clerk:	The Honorable Laura Richard
Date Issued:	7/6/2026 10:23:43 AM
Unique Reference Number:	CAA-CACFBABCCDAEDH-EIBFHBAA-DCGGJJDE-BFHCAGD-F
Case Number:	24-CCR-241836
Case Document:	Indictment: 1st QC-ckr/NE
Requesting Party Code:	20251012230437
Requesting Party Reference:	rolf.krueger@fortbendcountytexas.gov

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THE STATE OF TEXAS

VS

KYLE PRASAD GEORGE

Charann Thompson
255.005(a)
2604000424-CCR-241836
INDI
Indictment
7157470

D.O.B.: 03/25/1964	CONTROL NO: 24-009739
CHARGE: MISREPRESENT IDENTITY/CANDIDATE/ MA	ARREST DATE: NA/ WARRANT
CASE NO: 24-CCR-241836	OFFENSE DATE: September 26, 2022
COUNTY COURT AT LAW NO: 5	AGENCY/AGENCY #: DISTRICT ATTORNEY/ 24008
RAIL AMOUNT: \$1,000.00 PR TW	PRIOR CASE #:
RELATED CASES:	CO-DEF:

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

The duly organized Grand Jury of Fort Bend County, Texas, presents in the County Court of Fort Bend County, Texas, that in Fort Bend County, Texas, **KYLE PRASAD GEORGE**, hereafter styled the Defendant, heretofore on or about **September 26, 2022**, did then and there misrepresent defendant's identity, namely by posing as Facebook user "Antonio Scalywag", in a campaign communication posted on defendant's Facebook page with intent to injure a candidate or influence the result of an election;

FILED
2024 SEP 26 PM 12:04
D. R. W.
COUNTY CLERK
FORT BEND COUNTY TEXAS

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Kenneth Shavers
FOREMAN OF THE GRAND JURY

INDICTMENT (ORIGINAL/DA)

Unique Code : CAA-CACFBABCCDAEDH-EIBFHBA-DCGGJJDE-BFHCAGD-F Page 1 of 1

I, **LAURA RICHARD**, County Clerk of Fort Bend County, Texas, do hereby certify that the foregoing is a true and correct copy as the same appears on file and recorded in the appropriate records.
Note: A portion of this document may have been redacted as allowed by law.



24-CCR-241836, 7/6/2026 10:23:43 AM
Laura Richard
24-CCR-241836, 7/6/2026 10:23:43 AM
The Honorable Laura Richard
FORT BEND COUNTY, TEXAS

Exhibit 10

Indictment from First Money Laundering Count



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:46:27 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFBAICFE-BFHAIJB-J
Case Number:	25-DCR-110888A
Case Document:	Indictment: \$10,000.00

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THE STATE OF TEXAS

VS

KYLE PRASAD GEORGE

25-DCR-110888A
INDI 1
Indictment
7374939



Charann Thompson
34.02(a) (2)
63000002

D.O.B.: 03/25/1964	DA CONTROL NO: 25-002886
FELONY CHARGE: MONEY LAUNDERING >=\$30K<\$150K/ F3	ARREST DATE: RE-INDICTMENT
CAUSE NO: 25-DCR-110888A	OFFENSE DATE: April 22, 2019
DISTRICT COURT NO: 458TH	AGENCY/AGENCY NO: DISTRICT ATTORNEY/ 2401
BAIL AMOUNT: \$10,000.00	PRIOR CAUSE NO: 25-DCR-110888
RELATED: MONEY LAUNDERING >=\$30K<\$150K	CO-DEF:

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

The duly organized Grand Jury of Fort Bend County, Texas, presents in the District Court of Fort Bend County, Texas, that in Fort Bend County, Texas, KYLE PRASAD GEORGE, hereafter styled the Defendant, heretofore on or about April 22, 2019,

PARAGRAPH I

did then and there knowingly possess, and/or transfer, and/or transport the proceeds of criminal activity, namely, the felony of wire fraud in violation of 18 United States Code Section 1343;

And it is further presented that the proceeds of the criminal activity are related to one scheme or continuing course of conduct, and the aggregate value of the proceeds is \$30,000 or more but less than \$150,000

PARAGRAPH II

did then and there knowingly conduct and/or facilitate one or more transactions involving the proceeds of criminal activity, namely the felony of wire fraud in violation of 18 United States Code Section 1343;

And it is further presented that the proceeds of the criminal activity are related to one scheme or continuing course of conduct, and the aggregate value of the proceeds is \$30,000 or more but less than \$150,000

AGAINST THE PEACE AND DIGNITY OF THE STATE.

FILED

2025 NOV 24 PM 1:35

Beverly McGrew Walker

CLERK DISTRICT COURT
FORT BEND CO., TX

Daniel Kelly
FOREMAN OF THE GRAND JURY

INDICTMENT (ORIGINAL/DA)

I, BEVERLEY MCGREW WALKER, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-DCR-110888A, 7/2/2026 2:46:27 PM

Beverly McGrew Walker
The Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit 11

Indictment from Second Money Laundering Count



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:53:41 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DFBAIBEA-BFHAJBE-H
Case Number:	25-DCR-110889A
Case Document:	Indictment: \$10,000.00

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THE STATE OF TEXAS

VS

KYLE PRASAD GEORGE

25-DCR-110889A
INDI 1
Indictment
7374930

Charann Thompson
34.02 (e) (2)
63000002



D.O.B.: 03/25/1964	DA CONTROL NO: 25-002873
FELONY CHARGE: MONEY LAUNDERING >=\$30K<\$150K/ F3	ARREST DATE: RE-INDICTMENT
CAUSE NO: 25-DCR-110889A	OFFENSE DATE: January 28, 2019 - April 22, 2019
DISTRICT COURT NO: 458TH	AGENCY/AGENCY NO: DISTRICT ATTORNEY/ 24041
BAIL AMOUNT: \$10,000.00	PRIOR CAUSE #: 25-DCR-110889
RELATED CASE: MONEY LAUNDERING >=\$30K<\$150K	CO-DEF:

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

The duly organized Grand Jury of Fort Bend County, Texas, presents in the District Court of Fort Bend County, Texas, that in Fort Bend County, Texas, KYLE PRASAD GEORGE, hereafter styled the Defendant, heretofore on or about January 28, 2019, and continuing through April 22, 2019,

PARAGRAPH I

did then and there knowingly possess, and/or transfer, and/or transport the proceeds of criminal activity, namely, the felony of tampering with a governmental record, to wit: a campaign finance report filed on or about January 14, 2019;

And it is further presented that the proceeds of the criminal activity are related to one scheme or continuing course of conduct, and the aggregate value of the proceeds is \$30,000 or more but less than \$150,000.

PARAGRAPH II

did then and there knowingly conduct and/or facilitate one or more transactions, to wit: a transfer of \$30,000, and/or a transfer of \$16,500, and/or a withdrawal of \$52,045.49, which involved the proceeds of criminal activity, namely, the felony of tampering with a governmental record, to wit: a campaign finance report filed on or about January 14, 2019;

And it is further presented that the proceeds of the criminal activity are related to one scheme or continuing course of conduct, and the aggregate value of the proceeds is \$30,000 or more but less than \$150,000.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

FILED

2025 NOV 24 PM 1:35

Beverly McGrew Walker

CLERK DISTRICT COURT
FORT BEND CO. TX

INDICTMENT (ORIGINAL/DA)

David Kemp
FOREMAN OF THE GRAND JURY

I, BEVERLEY MCGREW WALKER, hereby certify this document is a true and correct copy of the official record filed in the Office of the Fort Bend County District Clerk in the State of Texas. This document may have redactions as required by law.



25-DCR-110889A, 7/2/2026 2:53:41 PM

Beverly McGrew Walker
The Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Exhibit 12

Criminal Suspension Order



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:53:41 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDEBFFI-BFHAJBG-D
Case Number:	25-DCR-110889A
Case Document:	Order: State's Proposed Order Requesting Order on Suspensio

HOW TO VERIFY THIS DOCUMENT

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25-DOR-1168894, 7/7/2026 2:53:41 PM
Beverley McGrew Walker
 The Honorable Beverley McGrew Walker
 FORT BEND COUNTY DISTRICT CLERK

Exhibit 13

Conviction for First Money Laundering Charge



Electronically Certified Court Record

(Cover Page)

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DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:46:27 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDECAJB-BFHAIJC-I
Case Number:	25-DCR-110888A
Case Document:	Conviction - Not Guilty Plea Jury Verdict: Judgment of Conv

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CAUSE No. 25-DCR-110888A

INCIDENT NO. /TRN: 924590184X

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



THE STATE OF TEXAS

v.

GEORGE, KYLE PRASAD
STATE ID No.: TX-11224203

§
§
§
§
§
§

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

Offense for which Defendant Convicted:

MONEY LAUNDERING >=\$30K<\$150K

Charging Instrument:

Indictment

Statute for Offense:

34.02(e)(2)

Date of Offense:

04/22/2019

Plea to Offense:

Not Guilty

Degree of Offense: Third Degree Felony

Verdict of Jury: Guilty

Findings on Deadly Weapon: N/A

1st Enhancement N/A

Finding on 1st Enhancement N/A

Paragraph:

Paragraph:

2nd Enhancement N/A

Finding on 2nd

Paragraph:

Enhancement Paragraph: N/A

Punishment Assessed by:

Date Sentence Commences: (Date does not apply to confinement served as a condition of community supervision.)

Judge

6/16/2026



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FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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:

\$ 5000

Restitution:

\$ 0

Restitution Payable to: NA

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

Court Costs:

\$ 310.00

Reimbursement Fees:

\$ 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



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FORT BEND COUNTY, TEXAS

Beverly McGrew Walker

Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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)



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

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.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



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



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Cause No: 25-DCR-110888A

THE STATE OF TEXAS

§ IN THE DISTRICT COURT OF

2

VS.

§ FORT BEND COUNTY, TEXAS

ස

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;



- 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, 20 28; 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, 20 26 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;

Unique Code : CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDECAJB-BFHAIJC-I Page 8 of 13



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 **Tara 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

[Signature]
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. J. [Signature]
Judge Presiding

JUN 16 2026
AT 4:56 P M.
Beverly McGraw Walker
CLERK DISTRICT COURT, FORT BEND CO., TX

6

25-DCR-110888A



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGraw Walker
Honorable Beverly McGraw Walker
FORT BEND COUNTY DISTRICT CLERK

CAUSE NO. 25-DCR-110889A

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

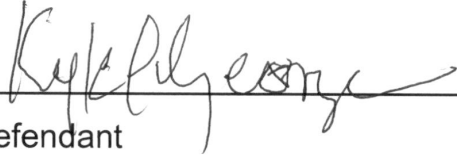
FILED

JUN 16 2026 ⁸⁰
AT 4:56 P M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



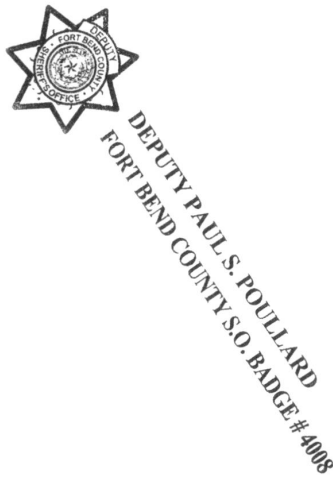
ACKNOWLEDGMENT

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 Syntek / Richard #208



Exhibit 14

Conviction for Second Money Laundering Charge



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:53:41 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDECAIH-BFHAJBF-D
Case Number:	25-DCR-110889A
Case Document:	Conviction - Not Guilty Plea Jury Verdict: Judgment of Conv

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.





CAUSE No. 25-DCR-110889A

INCIDENT No. /TRN: 924590184X

25-DCR-110889A
 CONJV 66
 Conviction - Not Guilty Plea Jury Verdict
 7484819



THE STATE OF TEXAS

v.

GEORGE, KYLE PRASAD
 STATE ID No.: TX-11224203

§ 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: **Woodfill, Jared**Offense for which Defendant Convicted:**MONEY LAUNDERING >=\$30K<\$150K**Charging Instrument:Statute for Offense:**Indictment****34.02(e)(2)**Date of Offense:Plea to Offense:**04/22/2019****Not Guilty**Degree of Offense: Third Degree FelonyVerdict of Jury: GuiltyFindings on Deadly Weapon: N/A1st Enhancement N/AFinding on 1st Enhancement N/A

Paragraph:

Paragraph:

2nd Enhancement N/AFinding on 2nd

Paragraph:

Enhancement Paragraph: N/A

Punishment Assessed by:Date Sentence Commences: (Date does not apply to confinement served as a condition of community supervision.)**Judge****6/16/2026**

CERTIFIED TRUE AND CORRECT COPY
 FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
 Honorable Beverly McGrew Walker
 FORT BEND COUNTY DISTRICT CLERK

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:

\$ 5,000

Restitution:

\$ NA

Restitution Payable to: NA

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

Court Costs:

\$ 310.00

Reimbursement Fees:

\$ NA

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.



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker

Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

☒ **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) \$ **5000** (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



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverly McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

☐ 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

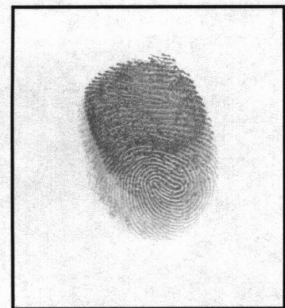
X *Maggie Pi-Juan*
JUDGE PRESIDING

FILED

JUN 16 2026 *805*
AT 4:57 P M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



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



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker
FORT BEND COUNTY DISTRICT CLERK

Cause No: 25-DCR-110889A

THE STATE OF TEXAS

§ IN THE DISTRICT COURT OF

20

VS.

§ FORT BEND COUNTY, TEXAS

20

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 25 Dec 110888 A

25-DCR-110889A



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverley McGrew Walker
Honorable Beverley McGrew Walker

FORT BEND COUNTY DISTRICT CLERK

- 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, 2029; 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;
Runs CC W 25DCR 110888A
- 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 W 25DCR 110888A

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 CL W/ 25 DCR 110888A

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;

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;

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;

Unique Code : CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDECAIH-BFHJBF-D Page 8 of 13



SPECIAL AMENDMENT TO TERMS OF COMMUNITY SUPERVISION

CAUSE # 25-DCR-110889A GEORGE, KYLE PRASAD

Ky **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.

Rune cc

Ky **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.

Rune cc

Ky **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.

Ky **CONDITION** SA20 ✓

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

Ky **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

[Signature]
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

Maggie R. Gravel

Judge Presiding

JUN 16 2026

AT 4:57 P M.

Beverly McGraw Walker
CLERK DISTRICT COURT, FORT BEND CO., TX

6

25-DCR-110889A



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGraw Walker
Honorable Beverley McGraw Walker
FORT BEND COUNTY DISTRICT CLERK

CAUSE NO. 25-DCR-110889A

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 FAILURE 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

6116126
DATE

6/16/26
DATE

[Signature]
DEFENDANT

[Signature]
ATTORNEY FOR DEFENDANT

[Signature] #208
SUPERVISION OFFICER

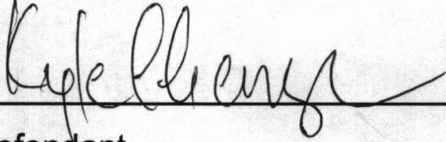
FILED

JUN 16 2026 ²⁰
AT 4:57 P M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



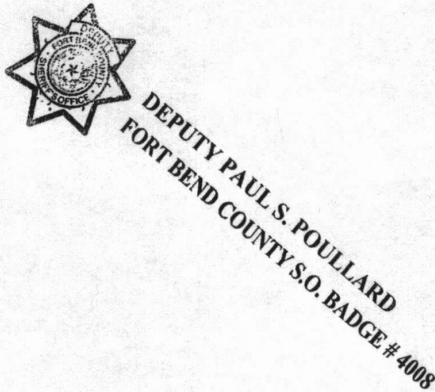
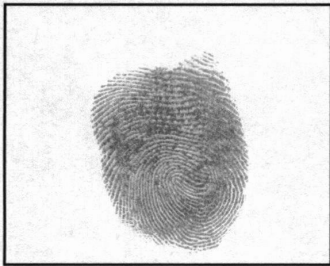
ACKNOWLEDGMENT

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 Syntek / Richard #208



Exhibit 15

Appeal of First Money Laundering Charge



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:46:26 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDEBFAJ-BFHAIJA-A
Case Number:	25-DCR-110888A
Case Document:	Notice of Appeal: Notice of Appeal

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



ROUTED TO COURT 6/17/2026 trn
RT'D TO D. CLERK 6/18/26 aa

No. 25-DCR-110888A

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

NOTICE OF APPEAL

TO THE COURT:

Appellant, Kyle Prasad George, hereby give notice of his desire to appeal the final judgment and sentence signed on or about June 16, 2026, by the 458th Judicial District Court of Fort Bend County, Texas, in cause number 25-DCR-110888A, styled *State of Texas v. Kyle Prasad George*.

Appeal is hereby taken to either the First Court of Appeals or the Fourteenth Court of Appeals in Houston, Texas.

This notice of appeal is filed by Appellant, Kyle Prasad George.

Dated: June 16, 2026.

25-DCR-110888A
NOTF 124
Notice
7484715



Respectfully submitted,

/s/Timothy A. Hootman

Timothy A. Hootman

SBN 09965450

2402 Pease St.

Houston, TX 77003

713.366.6229

thootman2000@yahoo.com

ATTORNEY FOR APPELLANT,
KYLE PRASAD GEORGE



CERTIFIED TRUE AND CORRECT COPY
FORT BEND COUNTY, TEXAS

Beverly McGrew Walker
Honorable Beverley McGrew Walker

FORT BEND COUNTY DISTRICT CLERK

CERTIFICATE OF SERVICE

I certify that I have served the forgoing document upon the following attorneys by hand delivery or electronic service to the attorneys for the State of Texas.

Dated: June 16, 2026.

/s/Timothy A. Hootman
Timothy A. Hootman

FILED

JUN 16 2026 *RO*
AT 4:02 P M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX



Exhibit 16

Appeal of Second Money Laundering Charge



Electronically Certified Court Record

(Cover Page)

This cover page is for informational purposes only and is not a requirement when presenting the **Electronic Certified Document**. At the last page of this document, you will find the digital signature bearing the identity and authority of the Fort Bend County District Clerk. On the left side of each page is a unique code identifying the electronic certification for this document.

DOCUMENT INFORMATION

Agency Name:	Fort Bend County District Clerk
District Clerk:	The Honorable Beverley McGrew Walker
Date Issued:	7/2/2026 2:51:00 PM
Unique Reference Number:	CAA-CACFBGBCCAAIFE-EIBFHCAA-DGDEBEJH-BFHAJAF-A
Case Number:	25-DCR-110889A
Case Document:	Notice of Appeal: Notice of Appeal

HOW TO VERIFY THIS DOCUMENT

This electronically certified Court Record contains a unique electronic reference number for identification printed on each page. This document is delivered in PDF format and contains a digital signature identifying the certifier and a tamper proof seal indicating whether this document has been tampered with. The last page of this document contains a digital signature indicating the certifier as the Fort Bend County District Clerk. Open this document using Adobe Reader software to verify the digital signature of the author. Visit the [Fort Bend County District Clerk Verification Page](#) to learn more about validating this certified copy.



No. 25-DCR-110889A

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

NOTICE OF APPEAL

TO THE COURT:

Appellant, Kyle Prasad George, hereby give notice of his desire to appeal the final judgment and sentence signed on or about June 16, 2026, by the 458th Judicial District Court of Fort Bend County, Texas, in cause number 25-DCR-110889A, styled *State of Texas v. Kyle Prasad George*.

Appeal is hereby taken to either the First Court of Appeals or the Fourteenth Court of Appeals in Houston, Texas.

This notice of appeal is filed by Appellant, Kyle Prasad George.

Dated: June 16, 2026.

Respectfully submitted,

/s/Timothy A. Hootman

Timothy A. Hootman

SBN 09965450

2402 Pease St.

Houston, TX 77003

713.366.6229

thootman2000@yahoo.com

ATTORNEY FOR APPELLANT,
KYLE PRASAD GEORGE

NOTF 62
Notice
7484710



CERTIFICATE OF SERVICE

I certify that I have served the forgoing document upon the following attorneys by hand delivery or electronic service to the attorneys for the State of Texas.

Dated: June 16, 2026.

/s/Timothy A. Hootman
Timothy A. Hootman

FILED
JUN 16 2026 ⁸⁰
AT 4:02 P.M.
Beverly McGrew Walker
CLERK DISTRICT COURT, FORT BEND CO., TX

