

CAUSE NO. CR-2056-19-A

STATE OF TEXAS	§	IN THE DISTRICT COURT
	§	
v.	§	92ND JUDICIAL DISTRICT
	§	
RICARDO MOLINA	§	HIDALGO COUNTY, TEXAS

**STATE'S RESPONSE TO DEFENDANT'S MOTION TO DISQUALIFY
DISTRICT ATTORNEY RICARDO RODRIGUEZ AND HIS ASSISTANTS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the State of Texas, by and through the Criminal District Attorney of Hidalgo County, and files this Response to Defendant Molina's Motion to Disqualify District Attorney Ricardo Rodriguez and His Assistants, and would show that Defendant Molina's motion is without merit and, therefore, should be DENIED.

I.
STATEMENT OF FACTS

On November 7, 2017, Defendant Richard Molina wins the City of Edinburg mayoral election.

On December 6, 2017, Mary Alice Palacios prepared and submitted a complaint to the Texas Secretary of State. (*See Exhibit A*)

On January 18, 2018, the Texas Secretary of State determined there was reasonable cause to suspect that the alleged criminal conduct occurred and forwarded

the complaint to the Texas Attorney General's Office for further review and criminal investigation. (*See Exhibit B*) *see also* Texas Election Code §31.006.

On March 20, 2018, Assistant Attorney General of Texas, Jonathan White requested the assistance of the Hidalgo County District Attorney Office with the investigation and any resulting prosecution of this case. (*See Exhibit C*).

On April 4, 2018, in an effort better assist the Attorney General investigators locally, the District Attorney's office contacted the Texas Rangers and asked them to assist in the investigation of this case (*See Exhibit D*).

On April 25, 2019, Defendant Richard Molina is arrested on one count of Engaging in Organized Voter Fraud and two counts of Illegal Voting.

On June 6, 2019, a duly impaneled Grand Jury for the 464th Judicial District Court of Hidalgo County Texas issued a true bill of indictment charging Defendant Richard Molina with one count of Engaging in Organized Voter Fraud and eleven counts of Voter Fraud-- a first degree felony and second degree felony respectively. (*See Indictment*).

On June 17, 2019, Defendant Molina is arraigned on his charges.

On July 23, 2019, the State filed State's Notice of Appearance of Counsel, defining from the onset counsels' roles in the prosecution of this case. The notice states in part:

“Texas Election Code Section 273.021, authorizes prosecution of felony election offenses by either the local District Attorney, or the Attorney General.

In this case, Assistant Attorney General Jonathan White will assist lead prosecutor Assistant District Attorney Michael J. Garza in a **joint prosecution of the above cause.**” (emphasis added)

(*See Exhibit E*).

On March 12, 2020, the trial court entered its Order Setting Trial. Said order set this cause for a trial date of June 1, 2020.

On March 13, 2020, the Texas Supreme Court entered its First Emergency Order Regarding the COVID-19 State of Disaster. (*See Exhibit F*).

On March 16, 2020, the Hidalgo County Board of Judges entered its order cancelling all jury panels until May 8, 2020. (*See Exhibit G*).

On May 14, 2020, the trial court entered its order postponing the trial date, indefinitely, in this cause.

On October 12, 2021, the State filed its Motion for Jury Trial Setting. In said motion, the State noted that jury trials were to resume, on October 25, 2021, after expiration of the Eleventh Emergency Order entered by the Hidalgo County Board of Judges. The State requested that the case be set on the jury docket as soon as possible.

On October 20, 2021, Defendant Molina filed his Motion to Disqualify District Attorney Ricardo Rodriguez and His Assistants.

The State now files this response to Defendant Molina’s motion to disqualify.

II. **ARGUMENT AND AUTHORITIES**

The court should deny Defendant Molina's motion because it is not supported in law or fact. District attorneys shall represent the State. TEX. CONST. art. V, § 21. The duties of those offices are to be regulated by the Legislature. Art. V, § 21; *State ex rel. Holmes v. Salinas*, 784 S.W.2d 421 (Tex.Cr.App.1990). The Legislature has codified those rules in statutes.

Under Texas law, a district attorney shall represent the State in all criminal cases in the district courts of his district and in appeals from those cases. TEX. CODE CRIM. PROC. ART. 2.01; *Coleman v. State*, 246 S.W.3d 76, 81 (Tex. Crim. App. 2008). The authority of county and district attorneys cannot be abridged or taken away. *State ex rel. Eidson v. Edwards*, 793 S.W.2d 1, 4 (Tex. Crim. App. 1990). Moreover, the State may not be represented in district or inferior courts by any person other than the county or district attorney. *Id.*

A. RECUSAL IS DISCRETIONARY AND SOLELY DECIDED BY THE DISTRICT ATTORNEY

A trial court may appoint an attorney pro tem to represent the State whenever an attorney for the State is disqualified. TEX. CODE CRIM. PROC. ART. 2.07(a). In any event, the term disqualification must be distinguished from recusal because the terms are not interchangeable. *See In re Guerra*, 235 S.W.3d 392, 410 (Tex. App.—Corpus Christi 2007, orig. proceeding); *see also In re State of Tex.*, 2014 Tex. App.

LEXIS 6169, at *12. In this context, legal disqualification refers to the ineligibility to act as the prosecutor in a criminal case. *Coleman*, 246 S.W.3d at 81.

Recusal refers to the voluntary removal of a prosecutor because of a conflict of interest or for some other good cause. *See In re Ligon*, 408 S.W.3d at 891; *see also In re State of Tex.*, 2014 Tex. App. LEXIS 6169, at **14-15. A district attorney who is not legally disqualified may request that the trial court permit him to recuse himself in a particular case for good cause. TEX. CODE CRIM. PROC. ART. 2.07(b-1) (“An attorney for the state who is not disqualified to act may request the court to permit him to recuse himself in a case for good cause and upon approval by the court is disqualified.”); *Coleman*, 246 S.W.3d at 81. Based on this procedure, a district attorney may avoid conflicts of interest and the appearance of impropriety by deciding not to participate in certain cases. *Coleman*, 246 S.W.3d at 81. After the trial court approves the voluntary recusal, the district attorney is considered “disqualified.” TEX. CODE CRIM. PROC. ART. 2.07(b-1); *Coleman*, 246 S.W.3d at 81.

And finally, the responsibility for making the decision to recuse is that of the district attorney; a trial court does not have the authority to compel a district attorney to recuse. *Landers v. State*, 256 S.W.3d 295, 306 (Tex. Crim. App. 2008); *Coleman*, 246 S.W.3d at 81; *see Johnson v. State*, 169 S.W.3d 223, 229 (Tex. Crim. App. 2005) (“A prosecutor’s refusal to recuse himself from the case cannot be corrected because the trial court has no authority to force a recusal.”); *State ex rel. Hill*, 887

S.W.2d at 932 (“As this Court has ruled before, neither an elected prosecuting attorney, nor his assistants, can be disqualified or prevented by a trial court from carrying out their duties to prosecute criminal cases.”); *see also State ex rel. Eidson*, 793 S.W.2d at 5 (“A trial judge is without legal authority to remove a District Attorney from a case and, as such, any order attempting to do so is void.”).

B. A DISTRICT ATTORNEY MAY NOT BE DISQUALIFIED UNLESS DEFENDANT PROVES GROUNDS UNDER ARTICLE 2.08 OR THE CONFLICT OF INTEREST RISES TO THE LEVEL OF A DUE PROCESS VIOLATION

A trial court may not disqualify a district attorney for a conflict of interest unless the conflict rises to the level of a due-process violation. *See State ex rel. Hill v. Pirtle*, 887 S.W.2d 921, 927 (Tex. Crim. App. 1994); *see also Landers v. State*, 256 S.W.3d 295, 304 (Tex. Crim. App. 2008). Mere allegations of wrongdoing will not suffice. *See State ex rel. Hilbig v. McDonald*, 877 S.W.2d 469, 471-72 (Tex. App.—San Antonio 1994, orig. proceeding). Instead, "a due-process violation occurs only when the defendant can establish 'actual prejudice,' not just the threat of possible prejudice . . ." *Goodman v. State*, 302 S.W.3d 462, 467 (Tex. App.—Texarkana 2009, pet. ref'd) (citing *Landers*, 256 S.W.3d at 304-05).

The United States Supreme Court, in *Marshall v. Jerrico*, noted that, although due process guarantees an "impartial and disinterested tribunal in both civil and criminal cases," 446 U.S. 238, 242 (1980), the standards of neutrality that apply to

judges are not so stringently required of prosecutors. *Id.*, at 248 "Prosecutors need not be entirely `neutral and detached[.] In an adversary system, they are necessarily permitted to be zealous in their enforcement of the law." *Ibid.*

1. DEFENDANT MOLINA FAILS TO PLEAD OR PROVE DISTRICT ATTORNEY RICARDO RODRIGUEZ SHOULD BE DISQUALIFIED UNDER ARTICLE 2.08 OF THE TEXAS CODE OF CRIMINAL PROCEDURE

The legislature codified the basis for disqualifying a district attorney in Article 2.08 of the Texas Code of Criminal Procedure. Under Article 2.08, there are only two grounds for disqualification: (1) district and county attorneys shall not be of counsel adversely to the State in any case, nor shall they, after they cease to be such officers, be of counsel adversely to the State in any case in which they have been of counsel for the State; and (2) a judge of a court in which a district or county attorney represents the State shall declare the district or county attorney disqualified for purposes of article 2.07 on a showing that the attorney is the subject of a criminal investigation by a law enforcement agency if that investigation is based on credible evidence of criminal misconduct for an offense that is within the attorney's authority to prosecute. TEX. CODE CRIM. PROC. ART. 2.08.

Defendant Molina's motion to disqualify does not reference either of the legal grounds for disqualification set forth in Article 2.08 of the Texas Code of Criminal Procedure. Furthermore, none of the exhibits attached to Defendant Molina's motion establishes proof of either of the legal grounds for disqualification set forth in Article

2.08. With respect to the instant case, it is undisputed that District Attorney Ricardo Rodriguez is not of counsel adverse to the State, nor is he the subject of a criminal investigation. *See* TEX. CODE CRIM. PROC. ART. 2.08.

2. DEFENDANT MOLINA FAILS TO PROVE A CONFLICT OF INTEREST

When an alleged conflict of interest is at issue, a district attorney or his or her staff may not be disqualified unless an actual conflict of interest exists and that conflict rises to the level of a due-process violation. *Landers v. State*, 256 S.W.3d 295, 305 and 310 (Tex. Cr. App. 2008). The United States Supreme Court has said, "An arrangement represents an actual conflict of interest if its potential for misconduct is deemed intolerable." *Young v. United States ex rel. Vuitton et Fils S.A.*, 481 U.S. 787, 807 n.18 (1987). Texas courts have deemed intolerable the situation where a prosecutor represents the State in prosecuting someone he previously represented in the same case. *Ex parte Morgan*, 616 S.W.2d 625 (Tex. Cr. App. 1981); *Ex parte Spain*, 589 S.W.2d 132 (Tex. Cr. App. 1979). Such a conflict amounts to a denial of due process under the Fourteenth Amendment of the United States Constitution and Article I, Section 19 of the Texas Constitution. *Ibid.*; *Landers*, 256 S.W.3d, at 304.

In other situations, the conflict is not so obvious as to require automatic disqualification, and the defendant must establish a due-process violation by showing "actual prejudice." *Landers*, 256 S.W.3d, at 304-05. For instance, a county attorney was not disqualified from assisting in the prosecution of a rape charge against a

defendant whom he had previously represented in a separate rape case, where "there was absolutely no discussion of the facts of the instant case." *Munguia v. State*, 603 S.W.2d 876, 878-79 (Tex. Cr. App. 1980).

In *Landers*, a case in which the district attorney prosecuted a defendant whom he had previously represented in a separate case, the Texas Court of Criminal Appeals said that an "actual conflict of interest" is demonstrated when, "as a result of that former attorney-client relationship, the prosecution has obtained confidential information which may be used to the defendant's detriment at trial." *Landers*, 256 S.W.3d, at 305, quoting *State v. Camacho*, 329 N.C. 589, 601, 406 S.E.2d 868, 875 (1991). Because the court found no confidential information was used in *Landers*, they concluded that the appellant failed to establish a due-process violation. *Id.*, at 310.

Instead of pleading and proving the grounds of disqualification under Article 2.08, Defendant Molina couches his claim in terms of a due process violation. Defendant Molina primarily relies on *In re Guerra*, 235 S.W.3d 392 (Tex. App.—Corpus Christi 2007) to support his position that District Attorney Ricardo Rodriguez has an 'intolerable conflict of interest' that violates his right to due process. *In re Guerra* holds the following:

The absence of an impartial and disinterested prosecutor has been held to violate a criminal defendant's due process right to a fundamentally fair trial. Put another way, the due process rights of a criminal defendant are violated when a prosecuting attorney who has a conflict of interest relevant to the defendant's case prosecutes the defendant. It is clear; however, that the trial court may not disqualify a district

attorney or his staff on the basis of a conflict of interest that does not rise to the level of a due-process violation.

The question whether there is a conflict of interest is dependent upon the circumstances of the individual case. Because there is no bright-line rule for determining whether a conflict rises to the level of a due-process violation, each case must be analyzed on the facts peculiar to it. As the United States Supreme Court has explained:

Due process “is not a technical conception with a fixed content unrelated to time, place and circumstances.” Rather, the phrase expresses the requirement of “fundamental fairness,” a requirement whose meaning can be as opaque as its importance is lofty. Applying the Due Process Clause is therefore an uncertain enterprise [that] must discover what “fundamental fairness” consists of in a particular situation by first considering any relevant precedents and then by assessing the several interests that are at stake.

The burden is on the party seeking disqualification of the prosecutor to present evidence establishing the existence of disqualifying bias or prejudice. Mere allegations of wrongdoing will not suffice.

The issue of what constitutes an “impartial” prosecutor requires explanation. A prosecutor is not “partial” simply because he zealously seeks a conviction. Rather, “partiality” in this context is similar to a conflict of interest in the sense that the prosecutor has a personal interest or stake in the outcome of the criminal prosecution. Thus, “partiality” refers not to personal zeal but to a situation where the personal interests of the prosecutor generate a structural conflict of interest. That is to say, a prosecutor's personal interest or partiality may present “an actual conflict of interest if its potential for misconduct is deemed intolerable.”

In this regard, we would note that courts have observed that “the zeal of the prosecutor who covets higher office or who has a personal political axe to grind may well exceed the zeal of” a prosecutor who has more limited ambitions. Nevertheless, a prosecutor's political ambitions alone are not enough to support a finding that a prosecutor is

not sufficiently disinterested. Furthermore, Texas case law clearly shows that a mere potential or perceived conflict of interest is not sufficient to warrant disqualification. We do not lightly disrupt the orderly prosecution of those who have committed crimes against the State and her citizens.

In re Guerra, 235 S.W.3d 392, 429-30 (Tex. App.—Corpus Christi 2007)(internal citations omitted).

3. DEFENDANT MOLINA FAILS TO PROVE A DUE PROCESS RIGHT VIOLATION

Like his failure to establish any of the grounds of disqualification under Article 2.08, Defendant Molina likewise fails to establish proof of a conflict that constitutes a violation of his right to due process.

The State first notes that Defendant Molina could have filed his motion prior to this Court's first trial setting date. After all, all the alleged facts and circumstances that Defendant Molina relies on in proving his due process claims were known to him *before* the time of the first trial setting date in 2020. Defendant Molina does not explain why he failed to present this motion as soon as he was aware of the involvement of District Attorney Ricardo Rodriguez in this case. The record reflects that Defendant Molina was informed that District Attorney Ricardo Rodriguez was involved in the prosecution of his case around the time of his arraignment. Indeed, on July 12, 2019, the State filed its 'State's Notice of Contact Information', in which it explicitly informed this Court and Defendant Molina that this criminal cause

would be presented by the Hidalgo County District Attorney's Office. *See* (Exhibit H). Thus, Defendant Molina has been aware of the Hidalgo County District Attorney's Office's participation in his criminal case for over two years. The fact that Defendant Molina has only now raised his due process claims, a mere eight days after the State requested a trial setting date, raises questions as to its authenticity and purpose.

Defendant Molina does not even provide proof of "mere allegations of wrongdoing." He has a misguided assertion regarding the importance of whether District Attorney Ricardo Rodriguez or the Attorney General is 'lead' in this case. *See Defendant's Motion to Disqualify*, pp. 6-7. However, Defendant Molina completely ignores that the Texas Election Code authorizes the Attorney General the choice to direct the local district attorney to prosecute or assist the Attorney General to prosecute a criminal offense prescribed by the election laws of this state.¹ *See* TEX. ELECTION CODE § 273.021; 273.022. Thus, whether District Attorney Ricardo Rodriguez is 'lead' or not is irrelevant. The local district attorney is free to prosecute Defendant Molina regardless of whether he is 'lead' or not.

¹ It is undisputed that Defendant Molina has been charged with criminal offenses prescribed by the elections law of this state.

a. Defendant Molina and the District Attorney Are Not Political Opponents

Defendant Molina claims that “this is not a situation in which the defendant and prosecutor are merely from opposing political parties.” *See Defendant’s Motion to Disqualify*, p. 6. This assertion is incorrect because neither District Attorney Ricardo Rodriguez nor Defendant Molina are opposing political parties, nor political opponents. District Attorney Ricardo Rodriguez has never run against Defendant Molina for any elected position, including for mayor of Edinburg, nor has anyone in District Attorney Ricardo Rodriguez’s family run against Defendant Molina for any elected position. Likewise, Defendant Molina has not run for Hidalgo County District Attorney. The facts in this case are distinguishable from *In re Guerra*, where direct political opponents ran against each other in an election for district attorney.

b. Defendant Molina’s Faulty Assumptions

Incorporated in 1908, the City of Edinburg was established as a commission form of government that at first consisted of one mayor and two commissioners. Over the years this commission form of government grew to four commissioners and one mayor. According to its charter, each council member, including the mayor, has one vote.

Many, if not all, of Defendant’s arguments center around the District Attorney’s extended family’s relationship with the City of Edinburg. Defendant Molina makes bold assertions that his victory as mayor would cause the District

Attorney's extended family to lose contracts and employment positions with the City of Edinburg. First, this argument foreshadows Defendant's intended abuse of power as mayor. Defendant Molina only has one vote on contracts, employment or any other matter brought before the commission. His argument that the District Attorney's family would lose contracts and employment because of his victory assumes that the majority of the city council would vote as he did. While he may think and boldly state he controls all votes, the truth is—in a democratic commission form of government-- he is only one vote and to assume otherwise would be an affront to the citizens of the city he represents.

c. Mary Alice Palacios Status as a Reporting Party Does Not Create a Conflict of Interest

Defendant Molina assigns much weight to the fact that the complainant in this case was Mary Alice Palacios, the aunt of District Attorney Ricardo Rodriguez. The facts demonstrate that in mid-November 2017, information regarding fraud that took place in the 2017 Edinburg City election was turned over to Ms. Palacios. On December 6, 2017, Ms. Palacios thereafter reported this information to the Secretary of State. (*See Exhibit A*). On January 18, 2018, the Texas Secretary of State determined there was reasonable cause to suspect that the alleged criminal conduct occurred and forwarded the complaint to the Texas Attorney General's Office for further review and criminal investigation. (*See Exhibit B*). Defendant Molina exaggerates Ms. Palacios' connection to his case, essentially asking this Court to

automatically assign nefarious bias and motive to District Attorney Ricardo Rodriguez beyond his constitutional mandate to zealously seek justice.

Ms. Palacios is not the victim of the offenses Defendant Molina has been charged with in this cause. Ms. Palacios is merely a reporting party. Defendant Molina has not been charged with committing a crime against a person, such as assault. Instead, Defendant Molina is charged with committing one count of Engaging in Organized Election Fraud and eleven counts of Illegal Voting. Thus, in his case, the State of Texas is the victim of the offenses Defendant Molina is now being prosecuted for.

Furthermore, Ms. Palacios reported Defendant Molina's crimes *prior* to the January 30, 2018 vote to terminate the *contract* of Gilberto Gonzalez's firm, Ms. Palacios' employer.² The investigation of the election had already been ongoing by the time the contract with Gilberto Gonzalez's firm was terminated. Defendant Molina's own attached exhibits establish this time line. *See Defendant's Motion to Disqualify*, exhibits A and C. Thus, Defendant Molina intentionally misleads this Court by attributing bias to District Attorney Ricardo Rodriguez for events occurring *after* the investigation had already begun. Defendant cannot prove there is an "actual due process" violation. There is no proof of the District Attorney's prior

² The State notes that Ms. Palacios is not a City of Edinburg employee, and therefore was not terminated from her employment with Gilberto Gonzalez's firm.

representation of a party. No proof of a pecuniary interest in the outcome of this prosecution or any related cases. And, no proof of any conflict of interest.

d. Family Members' Relationship with the City Does Not Create a Conflict of Interest

Defendant Molina claims District Attorney Ricardo Rodriguez has personal interests in the prosecution of Molina that requires disqualification. To the extent he relies on other events involving District Attorney Ricardo Rodriguez's extended family, Defendant Molina again exaggerates the weight this Court should give to said events.

J.R. Betancourt is Ricardo Rodriguez's brother-in-law. He was a former councilman for the City of Edinburg who voluntarily chose not to run for re-election in 2018. Defendant does not state how Mr. Betancourt choice not to run for re-election creates a conflict of interest in the prosecution of this case. It is an argument made in bad faith and once again not supported in fact or in law. Defendant does not prove an "actual due process" violation as required by law.

Toribio "Terry" Palacios is Ricardo Rodriguez's uncle. He is a municipal judge for the City of Edinburg. This is an elected position that Judge Palacios has held for 27 years. Defendant Molina fails to make a logical argument for a conflict of interest creating a due process violation. His argument is based on speculation and potential loss of a position. Defendant Molina states no logical nexus to the District Attorney or the prosecution of this case. It is an argument made in bad faith

and once again not supported in fact or in law. Defendant does not prove an “actual due process” violation as required by law.

Ricardo Palacios is an attorney and cousin of District Attorney Ricardo Rodriguez. He is a former city attorney for the City of Edinburg. He resigned his position in 2018. Mr. Palacios voluntarily resigned his position as city attorney. Defendant Molina states no logical nexus to the District Attorney or the prosecution of this case. It is an argument made in bad faith and once again not supported in fact or in law. This speculative argument once again relies on the faulty assumption that prosecuting this case somehow benefits the District Attorney. There is no proof that a conflict of interest exists and Defendant Molina fails to prove an “actual due process” violation as required by law.

III. **CONCLUSION**

Simply put, District Attorney Ricardo Rodriguez did not have a financial interest in the 2017 City of Edinburg election, nor does he have a financial interest in the upcoming 2021 City of Edinburg election as Defendant Molina now claims. District Attorney Ricardo Rodriguez has not represented Defendant Molina on any occasion. District Attorney Ricardo Rodriguez does not represent any interest adverse to the State of Texas.

CERTIFICATE OF SERVICE

I hereby that a copy of the above and forgoing State's Response To Defendant's Motion To Disqualify District Attorney Ricardo Rodriguez And His Assistants was delivered via electronic service to the following on the 8th day of November, 2021.

Carlos Garcia
Attorney for Defendant Richard Molina

/s/ Michael J. Garza

Michael J. Garza

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.

Krystal Garza on behalf of Michael Garza
Bar No. 788769
krystal.garza@da.co.hidalgo.tx.us
Envelope ID: 58959017
Status as of 11/8/2021 3:46 PM CST

Associated Case Party: THE STATE OF TEXAS

Name	BarNumber	Email	TimestampSubmitted	Status
Jonathan White		Jonathan.White@oag.texas.gov	11/8/2021 3:40:00 PM	SENT
MICHAEL JGARZA		MICHAELJ.GARZA@DA.CO.HIDALGO.TX.US	11/8/2021 3:40:00 PM	SENT

Associated Case Party: RICARDO MOLINA

Name	BarNumber	Email	TimestampSubmitted	Status
CARLOS GARCIA		email@thegarciafirm.com	11/8/2021 3:40:00 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
jesus contreras		warrants@hidalgo.org	11/8/2021 3:40:00 PM	SENT
MICHAEL GARZA		MICHAELGARZA@MAC.COM	11/8/2021 3:40:00 PM	SENT
CARLOS GARCIA		EMAIL@THEGARCIAFIRM.COM	11/8/2021 3:40:00 PM	SENT
CARLOS VALDEZ		CARLOS.VALDEZ@NUECESCO.COM	11/8/2021 3:40:00 PM	SENT
JONATHAN WHITE		JONATHAN.WHITE@TEXASATTORNEYGENERAL.GOV	11/8/2021 3:40:00 PM	SENT
FLORES LAW		FLORESLAW1@AOL.COM	11/8/2021 3:40:00 PM	SENT
MUNOZ LAW		MUNOZLAWFILE@GMAIL.COM	11/8/2021 3:40:00 PM	SENT
CARLOS AGARCIA		THELAWOFFICEOFCARLOSAGARCIA@GMAIL.COM	11/8/2021 3:40:00 PM	SENT