

**Gary B. Lawson**

[glawson@lfmcpc.com](mailto:glawson@lfmcpc.com)

Member of the College of the State Bar

November 6, 2003

Dallas Public Fraud Prevention Services  
P.O. Box 455  
Addison, Texas 75001-0455

RE: Amended Dates Regarding Your Letter of October 13, 2003

In your letter dated October 13, 2003, to Mr. Benevides, you brought to our attention that our October 1, 2003 response had an incorrect date listed for one of the case filings. The letter was not delivered to the City until October 31, 2003.

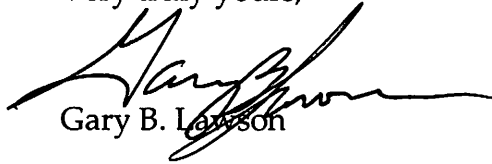
In entry 1 we listed the Nursery Licensing Association lawsuit to have been filed "on or about September 3, 2002" after reviewing the Complaint it appears that the precise file date was September 5, 2002. Please see attached Exhibit 1.

In entry 1b we identified the Farm Management Services lawsuit as having been filed "on or about March 31, 2003". Though we do not have a copy of this complaint, upon information and belief the actual file date was on April 2, 2003.

In entry 7 we listed the Dallas Police and Fire Pension System v. Columbus A. Alexander, III lawsuit to have been filed on May 5, 2002. After reviewing the Original Petition, the precise file date was May 29, 2002. Please see attached Exhibit 2.

Though all other information given to you was correct, we have also attached the file-stamped page from each of the other lawsuits mentioned in our October 1, 2003 letter. Please see attached Exhibit 3.

Very truly yours,



Gary B. Lawson

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cc: Ted Benevides, Dallas City Manager  
Shirley A. Acy, City Secretary

Attachments

1  
2 Patrick H. Ballew, WSBA No. 16969  
3 Rex B. Stratton, WSBA No. 1913  
4 STRATTON BALLEW PLLC  
5 213 S. 12<sup>th</sup> Avenue  
6 Yakima, Washington 98902  
7 (509) 453-1319

8  
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11 Attorneys for Plaintiff

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

SEP 05 2002

JAMES R. LARSEN, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF WASHINGTON

14 NURSERY LICENSING ASSOCIATION,  
15 LLC, a Washington limited liability  
16 company,

17 Plaintiff,

18 v.

19 TEXAS MUNICIPAL PLANS  
20 CONSORTIUM, a Delaware corporation;  
21 MONY LIFE INSURANCE COMPANY,  
22 a New York corporation; FARMLAND  
23 MANAGEMENT SERVICES, INC., a  
24 California corporation; A/B HOP FARMS,  
25 INC., a Washington corporation; ARNOLD  
26 O. BRULOTTE, an individual; BENNET  
27 G. BRULOTTE and TRACY A.  
28 BRULOTTE, individually and their marital  
29 community; and OLIVER BRULOTTE and  
30 PAMELA BRULOTTE, individually and  
31 their marital community,

32 Defendants.

CT-02-5077-RHW  
NO.

COMPLAINT FOR  
DECLARATORY  
JUDGMENT, TRADEMARK  
COUNTERFEITING AND  
INFRINGEMENT, FALSE  
DESIGNATION OF ORIGIN,  
PLANT PATENT  
INFRINGEMENT AND  
UNFAIR COMPETITION

DEMAND FOR JURY

CAUSE NO. 02-04814

FILED  
2002 MAY 29 PM 3:50

D.P.F.P.S.,

Plaintiff,

VS.

C.A. ALEXANDER,  
d/b/a CFOpros,

Defendant.

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IN THE DISTRICT COURT

OF DALLAS COUNTY, TEXAS

B-44th

JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION**

Plaintiff, the Dallas Police and Fire Pension System ("DPF") files this Original Petition against Columbus A. Alexander, III. a/k/a Sandy Alexander d/b/a CFOpros ("Defendant" or "Alexander"). This is a level Two case.

**I.**

**PRELIMINARY STATEMENT**

Defendant Alexander, despite receiving an extension of time and an increase in his fees, has breached his contract with DPF by, among other things, failing to provide DPF with a final report of his findings. Defendant continues to try to extort additional funds from DPF for the work that he was supposed to have completed under the contract. Accordingly, DPF was forced to retain the services of a replacement investigator, at substantial cost to DPF.

CAUSE NO.

03-01158

LARRY BRITTON, RICARDO CAMPBELL, §  
 CHARLES LEDBETTER, LARRY LITTON, §  
 NICK NOVELLO, PERRY SKIDMORE, §  
 LISA CONNAWAY, RONNIE BENEDICT, §  
 RONALD HUBNER, and MELVIN THOMAS §

Plaintiffs, §

vs. §

DALLAS POLICE & FIRE §  
 PENSION SYSTEM, DALLAS PARK §  
 RANGER DEPARTMENT, CITY OF §  
 DALLAS, DALLAS POLICE DEPARTMENT, §  
 CITY OF DALLAS EMPLOYEE §  
 RETIREMENT FUND, AND CITY OF §  
 DALLAS CIVIL SERVICE BOARD §

Defendants. §

IN THE DISTRICT COURT OF

FILED  
 2003 FEB -6 AM 10:46  
 CLERK  
 DALLAS COUNTY, TEXAS  
 DEPUTY

DALLAS COUNTY, TEXAS

J-191st

JUDICIAL DISTRICT

**PLAINTIFFS' ORIGINAL PETITION**

COMES NOW, Plaintiffs, Larry Britton, Ricardo Campbell, Charles Ledbetter, Larry Litton, Nick Novello, Perry Skidmore, Lisa Connaway, Ronnie Benedict, Ronald Hubner and Melvin Thomas (hereafter collectively referred to as "Plaintiffs"), by and through their attorneys of record, and file this, their Original Petition, against Dallas Police & Fire Pension System, Dallas Park Ranger Department, City of Dallas, Dallas Police Department, City of Dallas Employee Retirement Fund, and City of Dallas Civil Service Board (hereinafter collectively referred to hereafter as the "Defendants"), and allege and state as follows:

NO. 02-24885

FILED  
2007-11-15  
CLERK OF DISTRICT COURT

JIM GHOLSTON  
Plaintiff,

V.

DALLAS POLICE AND FIRE  
PENSION SYSTEM  
Defendant.

§ IN THE DISTRICT COURT  
§  
§ 241ST JUDICIAL DISTRICT COURT  
§ JUDICIAL DISTRICT  
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§ OF SMITH COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION**

**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES Jim Gholston, hereinafter called Plaintiff, complaining of and about Dallas Police and Fire Pension System, hereinafter called Defendant, and for cause of action shows unto the Court the following:

**DISCOVERY CONTROL PLAN LEVEL**

1. Plaintiff intends that discovery be conducted under Discovery Level 2.

**PARTIES AND SERVICE**

2. Plaintiff, Jim Gholston, is an Individual whose address is 1508 Hide-A-Way Lane West, Lindale, Texas 75771.

3. Defendant Dallas Police and Fire Pension System, a pension plan, may be served with a citation *directed to said Defendant* at the following address: 2777 Stemmons Frwy., Suite 825, Dallas, Texas 75207. Service of said Defendant as

CAUSE NUMBER: 03- 01545 FILED

03 FEB 19 AM 11:57

ELISABETH BUHK.

PETITIONER,

V.

THE DALLAS POLICE AND FIRE PENSION  
BOARD

RESPONDENT.

IN THE DISTRICT COURT

CLERK OF DISTRICT COURT  
DALLAS COUNTY, TEXAS  
DEPUTY

FOR THE JUDICIAL DISTRICT

K-192nd

OF DALLAS COUNTY, TEXAS

**PETITIONER'S APPEAL & WRIT OF MANDAMUS  
FROM FINAL DECISION OF THE DALLAS POLICE  
AND FIRE PENSION BOARD**



TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES , ELISABETHA BUHK, hereinafter called PETITIONER, appealing from the DALLAS POLICE AND FIRE PENSION BOARD (hereinafter referred to as "BOARD") decision to deny her spousal death benefits and requesting a writ of mandate to issue said benefits, and for cause of action shows unto the Court the following:

No. GN 202657

DALLAS POLICE AND FIRE  
PENSION SYSTEM,

PLAINTIFF,

v.

THE HONORABLE JOHN CORNYN,  
ATTORNEY GENERAL  
FOR THE STATE OF TEXAS,

DEFENDANT.

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IN THE DISTRICT COURT

98th

JUDICIAL DISTRICT

TRAVIS COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION FOR DECLARATORY RELIEF**

Plaintiff, Dallas Police and Fire Pension System (the "System or Plaintiff") files this Original Petition against John Cornyn, Attorney General of the State of Texas (the "Attorney General"). This is a level one case.

**I.**

**PRELIMINARY STATEMENT**

The System seeks relief from a Texas Open Records Act (the "Act") ruling issued by the Attorney General made pursuant to the Texas Open Records Act in OR2002-4165 that the System is required to turnover certain confidential and privileged records to a third party.

**II.**

**PARTIES**

1. Plaintiff Dallas Police and Fire Pension System is a governmental entity created pursuant to Article 6243a-1 of the Texas Statutes and is based in Dallas, Texas.

2. Defendant John Cornyn is the Attorney General for the State of Texas and may be served with process at 300 W. 15<sup>th</sup> Austin, Texas 78701. He is sued here in his official capacity only.

PLAINTIFF'S ORIGINAL PETITION  
FOR DECLARATORY RELIEF

**FILED**  
2002 AUG -9 PM 12: 57

DISTRICT COURT  
TRAVIS COUNTY, TEXAS

Page 1 of 4



No. 60301225

DALLAS POLICE AND FIRE  
PENSION SYSTEM,

PLAINTIFF,

v.

THE HONORABLE GREG ABBOTT,  
ATTORNEY GENERAL  
FOR THE STATE OF TEXAS,

DEFENDANT.

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IN THE DISTRICT COURT

353<sup>rd</sup> JUDICIAL DISTRICT

TRAVIS COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION FOR DECLARATORY RELIEF**

Plaintiff, Dallas Police and Fire Pension System (the "System or Plaintiff") files this Original Petition against Greg Abbott, Attorney General of the State of Texas (the "Attorney General"). This is a level one case.

**I.**

**PRELIMINARY STATEMENT**

The System seeks relief from a Texas Open Records Act (the "Act") ruling issued by the Attorney General made pursuant to the Texas Open Records Act in OR2003-2325 that the System is required to turnover certain confidential and attorney-client privileged records to a third party.

**II.**

**PARTIES**

1. Plaintiff Dallas Police and Fire Pension System is a governmental entity created pursuant to Article 6243a-1 of the Texas Statutes and is based in Dallas, Texas.

FILED  
2003 APR 17 AM 9:43

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