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**Amicus Curiae Citizen**

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**December 9, 2025** Via Texas eFile & eServe

Hon. Blake Hawthorne

Clerk, Supreme Court of Texas

RE: Tex. Case No. 25-0674

STYLE: In Re Abbott

CASE TYPE: The Original Quo Warranto Writ as a direct action in the state court of last resort in Texas

**Let's oust the incumbent Chief Disciplinary Counsel  
of the State Bar of Texas too!**

Hon. Clerk:

Also, I am thrilled as another Private Citizen that the incumbent Governor Abbott has taken the position that anyone can file a Quo Warranto ("QW") as a direct action with the Supreme Court of Texas as a Petitioner Private Person and against any state officer, official and employee of the Texas public service and from any branches of the state government (Executive, Legislative and Judiciary).

Also, I have grievances against some derelict Texas officials, and their removal from public offices would provide the most effective remedy and to bring accountability of their ultra vires acts and practiced in their official capacities as state public servants in Texas.

The Quo Warranto Writ looks like a promising tool to clean house (as other amicus curiae citizen has wrote to this court on 08/11/2025, see: Amicus Curiae Letter received on behalf of Wolfgang P. Hirczy de Mino, PhD), and to bring accountability in the public service in Texas and from any branches of the state government (Executive, Legislative and Judiciary) and to fight shirkers and scofflaws to root out nonfeasance and to comply with secure obedience and not defiance the Texas Constitution about their ultra vires official duties and holding in their official capacities in the public service in Texas.

The Court can simply take judicial notice of the relevant procedural facts in summary fashion and deem the failure of the targeted shirkers and scofflaws as state public officials and that did not comply with their official ministerial duties in their official capacities.

Also, and more recently, the incumbent Texas Governor's General Counsel, Mr. Trevor W. Ezell, he wrote a letter in lieu on 11/26/2025 and having been filed on behalf of Greg Abbott and addressed to this honorable court and having been published via online as case events.

In this letter and written in form of a notification message to the court, Mr. Ezell has cited some recent developments and that reinforce [in his opinion] the Governor's arguments and to request an immediate removal of office and from the part of one legislative member of the Texas House of Representatives.

Mr. Ezell wrote (02) two citations of the case law as authority in the matter of *Olmstead v. United States*, and mentioning the consequences of the doctrine of unclean hands and that has a trigger mechanism to execute wrongdoing and misconduct acts and bring anarchy and contempt for law.

He wrote on the pages number 1 & 2 of his letter in lieu the following texts:

*The doctrine of unclean hands is triggered by wrongdoing and misconduct. See: e.g., Olmstead v. United States, 277 U.S. 438, 483–485 (1928) (Brandeis, J., dissenting).* [Page Number one].

*“If the Government becomes a lawbreaker, it breeds contempt for law; it invites every man to become a law unto himself; it invites anarchy.” See: Olmstead, 277 U.S. at 485 (Brandeis, J., dissenting).* [Page Number two].

Also, Mr. Ezell has mentioned the words “*honoring his oath*” as post-truth method, and mentioning in his arguments as a fact for a wrongful abdication of duty and in relation of the invocation of the doctrine of unclean hands in Texas and cited by the Judge Smith in LULAC v. Abbott, 2025 WL 3215715, at \*81 (W.D. Tex. Nov. 18, 2025) (Smith, J., dissenting) (see the text on the page number 1 of the letter in lieu dated on 11/26/2025 and written by Mr. Ezell and addressed to this court).

The words “*honoring his oath*” as a post-truth method, it is a frequent matter in the Texas public service and it occurs in any level of the government and in any branches of the state government.

For example, the Texas Constitution, Article 16, Section 1(b), Subsection C requires that all state officers (elected and no elected [appointed] state officers) must submit their anti-bribery statements (Form 2201 - Statement of Officer) and Form 2204 – Official Oath of Office Affidavits with the Texas Secretary of State and before to take a public office in Texas and from local officers must be submitted with local authorities.

However, such constitutional requirements are not abided from certain state officers or officials or employees and that occupy a public office in the Texas public service.

For example, the incumbent Chief Disciplinary Counsel Seana Beckerman Willing is one real shirker and scofflaw as one appointed state public official and holding unconstitutionally a statewide public office installed in the administrative structure of the State Bar of Texas and that is one statewide administrative agency of the judicial department of the Texas Government and that is overall supervised by the State Judicial Agency of the Supreme Court of Texas and that promulgate the Texas Disciplinary for Professional Conduct Rules, Texas Disciplinary Rules for Procedure, the state statute 'State Bar Act' and codified by the Texas Government Code.

As Private Citizen, I requested to Mr. Spencer Walker as one Public Information Officer ("PIO") and Office Manager of the Legal Counsel Office of the State Bar of Texas for one copy of the anti-bribery statement (Form 2201 - Statement of Officer) and Form 2204 – Official Oath of Office Affidavit signed and notarized and submitted by the incumbent Chief Disciplinary Counsel Seana Beckerman Willing and before to take a statewide public office of the Office of Chief Disciplinary Counsel of the State Bar of Texas at Headquarters Corporate Office of the State Bar of Texas located in Austin, Travis County, Texas.

Mr. Spencer Walker answered via an email message that he does not have any responsive information in relation my request and submitted under the Public Information Act ("PIA") about the submission of the anti-bribery statement (Form 2201 - Statement of Officer) and Form 2204 – Official Oath of Office Affidavit of the incumbent Chief Disciplinary Counsel Seana Beckerman Willing with the Human Resources Department, Executive Director's Office, with the Office of

Chief Disciplinary Counsel and much less with the Texas Secretary of State and not having been found in absolutely in nothing about the material evidence as constitutional compliance that the incumbent Chief Disciplinary Counsel of the State Bar of Texas has sworn or affirmed in one official oath of office affidavit with her solemnly promise to abide with the United States Constitution, Texas Constitution, the laws of the United States and the laws in Texas and before to hold legitimately a state public office of the Office of Chief Disciplinary Counsel of the State Bar of Texas as required in the Form 2204 – Official Oath of Office Affidavit, and much less nothing has been found as material evidence as constitutional compliance that the incumbent Chief Disciplinary Counsel of the State Bar of Texas has submitted her anti-bribery statement (Form 2201 - Statement of Officer) signed and before to take a statewide public office in Texas.

It is an absurd that a top attorney of the Office of the Chief Disciplinary Counsel of the State Bar of Texas does not give the big example in compliance of the constitutional requirements in the Texas Public Service as one appointed state official and carrying out the title job as Chief Disciplinary Counsel of the State Bar of Texas and still being classified by the state statute ‘State Bar of Texas’ as one appointed ex-officio official and enjoying with multiple immunities as state official in the Texas Government as state government.

Also, such forms: The anti-bribery statement (Form 2201 - Statement of Officer) and Form 2204 – Official Oath of Office Affidavit is available via online with the Texas Governor’s website, see Appointment Application Forms: [Applications and Forms | Office of the Texas Governor | Greg Abbott](#)

While the elected President, Vice-President and Secretary of the Board of Directors of the State Bar of Texas must submit their constitutional filing documents with the Texas Secretary of State and before to take a public office, the

incumbent Chief Disciplinary Counsel Seana Beckerman Willing must submit her constitutional filing documents with the Office of Chief Disciplinary Counsel or Human Resources Department or with the Executive Director Office of the State Bar of Texas and being available for public view via the Public Information Act (“PIA”) with the Open Records Center of the State Bar of Texas and because she is an appointed state official and holding a state public office in one state public corporation and state administrative agency of the judicial department of the Texas Government and still enjoying with immunities as state public servant in Texas.

As a good example for unlawful and unconstitutional office holders have been identified by the Attorney General of Texas, Ken Paxton, who successfully sought the removal of the public office of (08) eight people via a writ of Quo Warranto and from the City of Austin’s Planning Commission as appointed Local Municipal Officials as Planning Commission’s Members on the grounds that they unlawfully held their local political positions under an unconstitutional holding provision and in clear constitutional violation of the qualifications for public office in Texas and under the ordinance of the City of Austin’s Charter and statutory provisions in the State of Texas.

Also, the City of Austin’s Planning Commission as appointed Local Municipal Officials as Planning Commission’s Members don’t receive a salary paid by the City of Austin and being voluntary members in that official capacity and they are not “State Officers” and having a political term of the two years as appointed Municipal Officials and not remunerated from one Commission of one Municipal Government.

The Chief Disciplinary Counsel of the State Bar of Texas is one appointed state official and holding a statewide public office of one statewide public corporation as statewide administrative agency of the judicial department of the Texas

Government and receiving an annual salary that is superior the amount paid in relation the annual salaries paid for elected State Judicial District Judges of the Judicial Department of the Texas Government and that are paid under the General Appropriations Act (GAA) of the Texas Legislature of the Texas Government.

Also, the incumbent Executive Director of the State Bar of Texas has an annual salary superior the amount paid to the incumbent Chief Justice of the Supreme Court of Texas.

Apparently, the appointed apparatchiks of the State Bar of Texas are the most high annual salaries remunerated and paid in the Texas Public Service and overwhelming, inclusive the annual salary paid to the Texas Governor as top elected executive officer in the entire state government.

Mr. Ezell has mentioned the words “*honoring his oath*” as a post-truth method and in relation one legislative member of the Texas House of Representatives and subject for one Quo Warranto Writ.

Here in this Amicus Curiae Citizen’s Letter, not even can be considering the words “*honoring his oath*” as *a post-truth method* to the appointed apparatchiks of the State Bar of Texas as a fact for a wrongful abdication of duty and in relation of the invocation of the doctrine of unclean hands in Texas. Because, such appointed apparatchiks not even have submitted their anti-bribery statement (Form 2201 - Statement of Officer) and Form 2204 – Official Oath of Office Affidavit signed, notarized and before to take a public office in one state public corporation as state administrative agency of the judicial department of the Texas Government.

Respectfully submitted,

/s/ Adriano Krueh Budri

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Citizen's Amicus Curiae in support of neither party

### **TRAP 11: STATEMENT AND CERTIFICATE OF SERVICE**

The undersigned amicus curiae is a Private Citizen, and hereby certifies that he has authored this amicus letter solely upon his own initiative and is not being paid by any party or nonparty for doing so. Nor has any compensation been promised for submitting this amicus curiae contribution. Tex. R. App. P. 11. All parties to this case are being served through the Texas e-filing system.

**December 9, 2025**

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