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Amicus Curiae Citizen

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 County Court at Law Donald Robert Pierson II located in Fort Worth, Tarrant County, Texas too!

Hon. Clerk:

The dereliction of the Texas officials is real in Texas, 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.

Another good example of the shirkers and scofflaws to root out nonfeasance and to comply with secure obedience and not defiance of the Texas Constitution about their ultra vires official duties and holding in their official capacities in the public service in Texas, it is notably found at Tarrant County Civil County Court at Law Number 1 in Fort Worth, Texas and where there is one incumbent elected state

judicial officer holding unlawfully, illegitimately and unconstitutionally one political public judicial office as Texas State Statutory Court for over 23 consecutive years and having been elected and re-elected as the only political judicial candidate and from the part of the Tarrant County Republican Party in Fort Worth, Texas in the last (05) five general elections in that same County's territorial boundaries located in northern region of Texas at the 8th Administrative Judicial Region of the Office of Administration Court (OCA) of the judicial department of the Texas Government.

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 and still flagrantly violate the Texas Constitution for legitimacy as office holders and holding legitimately in one public office in Texas.

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 County Court at Law Judge Donald Robert Pierson II is one real shirker and scofflaw as one elected state judicial officer and holding unconstitutionally a political and public statutory judicial office installed in the Old Court House Building of the Tarrant County Civil County Courts at Law in the Fort Worth downtown area of the Tarrant County, Texas and located in the administrative judicial region of the 8th AJR of the OCA in Fort Worth, Tarrant County, Texas.

As Private Citizen, I requested to the Texas State Department at the Elections Division via the Public Information Act (“PIA”) one copy of the anti-bribery statement (Form 2201 - Statement of Officer) signed and Form 2204 – Official Oath of Office Affidavit signed and notarized and submitted by the incumbent County Court at Law Judge Donald Robert Pierson II and before to take a statutory public judicial office located in Fort Worth, Tarrant County, Texas as one elected state judicial officer and clearly defined by the Texas Government Code for Ethics and that all County Court at Law Judges are State Officers and for this reason they are abided to comply with the Texas Constitution, Article 16, Section 1(b), Subsection C for legitimacy of the office holder and holding legitimately a public office in Texas.

The Public Information Officer (‘PIO”) of the Texas Secretary of State at the Elections Division answered via an email message that they don’t 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 elected and re-elected County Court at Law Judge Donald R. Pierson II and sitting at Tarrant County Civil County Court at Law Number 1 in Fort Worth, Tarrant County, Texas for more than 23 consecutive years and being that the Texas Elections Code requires that the Political Judicial Candidate elected and also re-elected must submit new constitutional filing documents about the anti-bribery statement (Form 2201 - Statement of Officer) and Form 2204 – Official Oath of Office Affidavit Chief Disciplinary for every new cycle of the general elections and that the political judicial candidate has been elected or re-elected for a political public office in Texas.

The Texas Secretary of State has not found in absolutely in nothing about the material evidence as constitutional compliance that the incumbent elected and re-elected County Court at Law Judge Donald R. Pierson II and sitting at Tarrant County Civil County Court at Law Number 1 in Fort Worth, Tarrant County, Texas has submitted to the Secretary of State in Texas his constitutional filing documents as required by the Texas Constitution.

Such constitutional filing documents are material evidence that the elected state judicial officer has really sworn or affirmed in one official oath of office affidavit with his 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 in Texas as required in the Form 2204 – Official Oath of Office Affidavit, as well as, with the anti-bribery statement (Form 2201 - Statement of Officer) signed and before to take a public judicial office in Texas.

It is an absurd that one former real estate attorney licensed by the State Bar of Texas and elected and re-elected as County Court at Law Judge in one Texas State Statutory Court in Fort Worth, Tarrant County, Texas does not give the big example in compliance of the constitutional requirements in the Texas an Judicial

Service as one elected and re-elected state judicial officer and carrying out the title job as County Court at Law Judge and sitting at Tarrant County Civil County Court at Law Number 1 in Fort Worth, Tarrant County, Texas.

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 honorable elected and appointed Justices of this honorable Supreme Court of Texas honor with their constitutional obligations for the anti-bribery statements (statements officer) and official sworn or affirmed oath of office affidavits and submitted properly with the Texas Secretary of State at the Elections Division and before to take a public judicial office in Texas, one elected and re-elected County Court at Law Judge and located at Tarrant County Civil County Court at Law Number 1 in Fort Worth, Tarrant County, Texas does not abide with the constitutional filing documents as required by the Texas Constitution, Article 16, Section 1(b), Subsection C and for legitimacy as office holder in one public office in Texas for more than 23 consecutive years as one *De Facto* Judicial Officer.

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.

Also, it is important to mention that all elected or appointed County Court at Law Judges in Texas are paid indirectly by County Governments, but such annual salaries are set by the General Appropriations Act (GAA) of the Texas Legislature of the Texas Government and not by the County Commissioners Court.

County Court at Law Judges are considered State Judicial Officers and all elected County Court at Law Judges must submit their constitutional filing documents with the Texas Secretary of State at the Elections Division and not with the County Clerk Office of the County Government as Local Government and with the Administrative Judicial Region Office of the Office of Court Administration (OCA) and because elected County Court at Law Judges are Elected State Judicial Officers and they are not visiting or retired associated judges.

Also, the incumbent County Court at Law Judge has an annual salary amount paid in 80% from the General Appropriation Act (GAA) and only 20% by the County Government and resulting in terms of pro-rata distribution a clear majority of the annual salary being paid by the state fund of the general appropriations act (GAA) as elected state officer in the judicial department of the Texas Government and for this reason County Court at Law Judges are State Officers and that must abide with

the Texas Constitution, Article 16, Section 1(b), Subsection C for legitimacy as office holder in one public office in Texas.

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, the words “*honoring his oath*” as a *post-truth method* to the elected and re-elected County Court at Law Judge Donald R. Pierson II is really a fact for a wrongful abdication of duty and in relation of the invocation of the doctrine of unclean hands in Texas.

Because, such elected and re-elected County Court at Law Judge Donald R. Pierson II has never submitted his anti-bribery statement (Form 2201 - Statement of Officer) signed and Form 2204 – Official Oath of Office Affidavit signed, notarized and before to take a public office in one political public statutory judicial office located in Fort Worth, Tarrant County, Texas, as one elected and re-elected state judicial officer and according definition described in the Texas Government Code for County Court at Law Judges in Texas.

So... this is more one example and that the General Counsel of the Texas Governor has cited in his letter in lieu dated on 11/26/2025 and having been filed on behalf of Greg Abbott and addressed to this honorable court about the citation:

“*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].

Moreover, it is clearly described in the Texas Judicial Conduct and adopted by the Texas State Commission on Judicial Conduct Canons that Political Judicial

Candidates and Office Holders cannot make Personal Political Propaganda in Personal Social Media Websites like FACEBOOK and much less Personal solicitations for Political Judicial Donations and also from others. See: [Judge Don Pierson | Facebook](#) published via online on 09/05/2025 in personal electronic message in personal social media website of FACEBOOK and soliciting personally for political judicial donations and the Texas State Commission on Judicial Conduct has ignored such flagrant violation of the Texas Judicial Conduct Code Canons and when one Texas State Judge abuses of prestige of the judicial office in personal social media websites for political judicial campaigns in Texas and the Texas Ethics Commission has played ostrich too.

Respectfully submitted,

/s/ Adriano Kruel 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

/s/ Adriano Kruel Budri

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