

## **Adriano Kruel Budri**

abudri64@gmail.com

### **Amicus Curiae Citizen**

---

**December 22, 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

## **The Petition for Quo Warranto Writ as direct action filed from one Private Citizen with the Supreme Court of Texas is the best example of democratic legal tool created by the Texas Legislature**

The writ of quo warranto (Latin for "*by what authority?*") is a legal action that challenges a person's right to hold a public office or franchise or one corporation. If successful, the legal maneuver can result in the person being removed from their position and to be unlawfully and unconstitutionally holding an office in flagrant violation of the Texas Constitution, article XVI, Section 1(c) about the lack of legitimacy as one legitimate and constitutionally of holding an office as office holder.

The writ has its origins in 13th-century England, where the monarch used it to challenge the legality of privileges and powers exercised by subjects.

In the United States, quo warranto actions are generally initiated by a state's attorney general and are used to ensure that public officials are rightfully holding lawfully and constitutionally their public positions in one determined public office as elected or appointed official.

This specific legal tool has used to invoke several recent cases and being generally initiated by a state's attorney general, but when a state's attorney general has failed to abide with his basic ministerial duties and to protect the Texas Constitution and against office holders as wrongdoers, then the private persons in Texas can file directly their petitions for quo warranto writs and directly with the Supreme Court of Texas and not needing the assistance and the good will of one state attorney general in Texas to file such direct action with the Supreme Court of Texas.

Governor Abbott initiated his constitutional right as private person and has filed directly with the Supreme Court of Texas his petition for quo warranto writ and without need the assistance of the state's attorney general of Texas. He stated in his petition for quo warranto writ that an elected state officer who refuses to perform his duties should be stripped from the public office that they are holding and mainly when the elected state officer has sworn or affirmed his official oath of office affidavit and having been signed and notarized publicly and also has signed his anti-bribery statement (statement officer) and before to take an public office in Texas.

But, and about the elected and appointed state officers and that even don't comply with the Texas Constitution, Article XVI, Section 1(c) and to hold legitimately a public office as a legitimate office holder in one public office in Texas as required by the Texas Constitution?

How many state officers are holding unlawfully and unconstitutionally public positions in public offices of the Texas Government Agencies, Texas Public Corporations, Texas Government Bodies, Texas Government Units, Government Boards, Government Commissions; Government Committees and even from Government Panels and et cetera?

The texts clearly described in the Texas Constitution, Article XVI; Section 1(c) has been tore down, every day and from the part of illegitimate and unconstitutional office holders and allotted in different public offices in Texas.

For example, it is unclear if the incumbent Chief Disciplinary Counsel Seana Beckerman Willing and holding a statewide public office located in one statewide public corporation and also being one statewide administrative agency of the judicial department of the Texas Government has legitimately and constitutionally holding such statewide public office called the Office of Chief Disciplinary Counsel of the State Bar of Texas and being one appointed state level officer and also occupying a seat in the Board of Directors of the State Bar of Texas as Ex-Officio Official and without have the right to vote in the Board of Directors of the State Bar of Texas and that is a government unit inside of the government body of the State Bar of Texas and having the same state officer multiple immunities as a shield to avoid liabilities of the official capacity that she hold as Chief Disciplinary Counsel of the State Bar of Texas.

This Amicus Curiae has requested a copy of her anti-bribery statement signed (statement officer) and also about her official sworn or affirmed oath of office affidavit signed and notarized publicly and before to take a statewide public office located in the infrastructure of the State Bar of Texas as statewide public corporation and statewide administrative agency of the judicial department of the Texas Government, but at the present time, the incumbent Chief Disciplinary Counsel Seana Beckerman Willing did not show her constitutional filing documents and clearly required by the Texas Constitution, Article XVI, Section 1(c) and to be a legitimate office holder of one statewide public office in the State of Texas.

This Amicus Curiae has requested not only with the Office of Chief Disciplinary Counsel of the State Bar of Texas and from the part of the Public Affairs Counsel Claire Reynolds, but also with the Human Resources Department, the Executive Director's Office, the Legal Counsel Office and with the Texas Secretary of State with the General Counsel Office and no department, section, and office has provided at least one copy of the anti-bribery statement signed and the official sworn or affirmed oath of office affidavit signed and notarized publicly and before her entrance as office holder of the Office of Chief Disciplinary Counsel of the State Bar of Texas on 03/04/2019.

Also, and more recently, such request has been extended in relation the incumbent Executive Director of the State Bar of Texas, Ervin A. Apffel III, who took the office in December, 2017, but the result of the written request submitted has been absolutely unclear and having the same unclear response and from the request submitted with the incumbent Chief Disciplinary Counsel of the State Bar of Texas.

Also, such request for copy of anti-bribery statement signed and the official sworn or affirmed oath of office affidavit signed and notarized publicly has been submitted with the Texas Secretary of State about the incumbent Executive Director of the State Commission on Judicial Conduct in Texas, specifically, Jacqueline Habersham, and the answer from the Texas Secretary of State at General Counsel Office has been that there is no responsive information in relation my request submitted, and in another words, such appointed state officers and occupying relevant statewide public offices in state government agencies are the first not to comply with the Texas Constitution, Article XVI, Section 1(c) for legitimacy as office holders and allotted in public offices of state government agencies of the judicial department of the Texas Government and to take an office legitimately as office holders and being in compliance of the Texas Constitution as legitimate office holders in public offices in Texas.

### **Summary Table: Requirements for State Officers**

Requirement	Provision	Key Constraint
<b>Anti-Bribery Statement</b>	<b>Art. XVI, § 1(b) &amp; (c)</b>	<b>Must be filed with the Secretary of State <i>before</i> the oath.</b>
<b>Official Oath of Office</b>	<b>Art. XVI, § 1(a)</b>	<b>Must be signed, notarized, and sworn and filed with the Secretary of State before to take office.</b>
<b>Consequence of Failure</b>	<b>Case Law / Statutes</b>	<b>Office may be declared vacant; legal standing can be challenged and the unconstitutional office holder can be summarily removed of the office via a direct action filed by a Private Citizen and directly with the Supreme Court of Texas and to request a direct removal of the illegitimate state officer and holding unconstitutionally one public office in Texas.</b>

Also, such written request of the copies of anti-bribery statements and oath of office affidavits are public documents and there are not constraints in relation “confidentiality” and to be released under the provisions of the Texas Public Information Act (“PIA”).

The office of Attorney General of Texas at Open Records Division is aware about such written requests and submitted to the specific government bodies of the Texas Government, but such written requests have been ignored by the Texas Government Bodies and same being copies of public documents and that are not confidential under the provisions of the Public Information Act (“PIA”).

For this reason, the legal tool of one direct action and filed by any Private Person and directly with the Supreme Court of Texas is one of the most democratic legal tool created by the Texas Legislature and to any citizen to request and directly with the Supreme Court of Texas for a Petition for Quo Warranto Writ and to request an immediate unlawful and unconstitutional office holder and holding unlawfully and unconstitutionally a public office in Texas to be summarily removed of the office.

Respectfully submitted,

/s/ Adriano Kruel Budri

Adriano Kruel Budri  
Amicus Curiae Citizen  
Email address: abudri64@gmail.com

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 22, 2025**

/s/ Adriano Kruel Budri  
Adriano Kruel Budri  
Amicus Curiae Citizen  
Email address: abudri64@gmail.com

## 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:

Envelope ID: 109390829

Filing Code Description: Amicus Brief

Filing Description: Amicus Brief

Status as of 12/23/2025 8:36 AM CST

### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Scott Brazil		scott@brazilanddunn.com	12/22/2025 7:18:03 PM	SENT
Kirsten Castaneda	792401	kcastaneda@adjtlaw.com	12/22/2025 7:18:03 PM	SENT
Alexandra Albright	21723500	Aalbright@adjtlaw.com	12/22/2025 7:18:03 PM	SENT
Justin Nelson	24034766	jnelson@susmangodfrey.com	12/22/2025 7:18:03 PM	SENT
Anna Baker	791362	abaker@adjtlaw.com	12/22/2025 7:18:03 PM	SENT
Hannah Roblyer	24106356	hroblyer@adjtlaw.com	12/22/2025 7:18:03 PM	SENT
Maria Williamson		maria.williamson@oag.texas.gov	12/22/2025 7:18:03 PM	SENT
Wolfgang P.Hirczy de Mino		wphdmphd@gmail.com	12/22/2025 7:18:03 PM	SENT
Stacey Jett		sjett@adjtlaw.com	12/22/2025 7:18:03 PM	SENT
Mandy Patterson		mpatterson@adjtlaw.com	12/22/2025 7:18:03 PM	SENT
Jonathan F.Mitchell		jonathan@mitchell.law	12/22/2025 7:18:03 PM	SENT
Wolfgang pHirczy de Mino		wphdmphd@gmail.com	12/22/2025 7:18:03 PM	SENT
Chad Dunn		chad@brazilanddunn.com	12/22/2025 7:18:03 PM	SENT
Jonathan Fombonne		jonathan.fombonne@harriscountytx.gov	12/22/2025 7:18:03 PM	SENT
Tiffany Bingham		tiffany.bingham@harriscountytx.gov	12/22/2025 7:18:03 PM	SENT
Rebecca Gonzalez-Rivas	24145204	bgonzalezrivas@adjtlaw.com	12/22/2025 7:18:03 PM	SENT
William Peterson		william.peterson@oag.texas.gov	12/22/2025 7:18:03 PM	SENT
Trevor Ezell		trevor.ezell@gov.texas.gov	12/22/2025 7:18:03 PM	SENT
Amy Ruzicka		amy.ruzicka@gov.texas.gov	12/22/2025 7:18:03 PM	SENT
Gene Wu		gene.wu@house.texas.gov	12/22/2025 7:18:03 PM	SENT
Jeri Hamman		jeri.hamman@solidcounsel.com	12/22/2025 7:18:03 PM	SENT
Dana Orsini		dana.orsini@solidcounsel.com	12/22/2025 7:18:03 PM	SENT
Mitch Little		mitch.little@solidcounsel.com	12/22/2025 7:18:03 PM	SENT
Amy Warr		awarr@adjtlaw.com	12/22/2025 7:18:03 PM	SENT

## 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:

Envelope ID: 109390829

Filing Code Description: Amicus Brief

Filing Description: Amicus Brief

Status as of 12/23/2025 8:36 AM CST

### Case Contacts

Amy Warr		awarr@adjtlaw.com	12/22/2025 7:18:03 PM	SENT
Mimi Marziani		mmarziani@msgpllc.com	12/22/2025 7:18:03 PM	SENT
Joaquin Gonzalez		gonzalez@msgpllc.com	12/22/2025 7:18:03 PM	SENT
Beth Stevens		bstevens@msgpllc.com	12/22/2025 7:18:03 PM	SENT
Jonathan F.Mitchell		jonathan@mitchell.law	12/22/2025 7:18:03 PM	SENT
John B.Scott		john.scott@scottpllc.net	12/22/2025 7:18:03 PM	SENT
Katy Peaslee		kpeaslee@susmangodfrey.com	12/22/2025 7:18:03 PM	SENT
William F.Cole		William.Cole@oag.texas.gov	12/22/2025 7:18:03 PM	SENT
Gwen Kelly		gwen@brazilanddunn.com	12/22/2025 7:18:03 PM	SENT
Christopher Garza		Christopher.Garza@harriscountytx.gov	12/22/2025 7:18:03 PM	SENT
Jesse Blakley		Jesse.Blakley@harriscountytx.gov	12/22/2025 7:18:03 PM	SENT
Eleanor Matheson		eleanor.matheson@harriscountytx.gov	12/22/2025 7:18:03 PM	SENT
Kevin E.Vickers		filings@vickers.esq	12/22/2025 7:18:03 PM	SENT