AUG 05 2023

CLERK OF THE COURT

THE SENATE OF THE STATE OF TEXAS
COURT OF IMPEACHMENT

IN THE MATTER OF
WARREN KENNETH PAXTON, JR.

ATTORNEY GENERAL WARREN KENNETH PAXTON, JR.'S
MOTION TO DISMISS ARTICLE VIII

An official's impeachment and removal from office inflicts a grievous injury on a representative government, directly overturning the will of the voters through the uncheckable acts of legislators who are not accountable to the whole State for their choices. This awesome power should be—and traditionally has been—reserved only for the most egregious of offenses, and even then only those so urgent that the eventual determination of the challenged individual's fitness for office at the ballot box comes far too late. It is inconceivable, then, that the House has chosen to impeach the recently reelected, third-term Attorney General because his office settled a case that certain legislators would have preferred to see go to trial.

The settlement at issue is a money-saving agreement that ends years-old litigation and saves the State millions of dollars in legal fees and millions more in potential liabilities at trial. Indeed, the economics of the settlement have never been reasonably questioned. But the settlement, like all settlements of its kind, is not self-funding; the Legislature retains the sole prerogative to decide whether it will be paid. In the 88th Regular Session, the Legislature declined to do so, thereby registering its disagreement with the Attorney General's Office through its unquestioned power of the purse. That should have ended the matter.

Instead, the House has done violence to our democracy by preferring an Article of Impeachment to express its displeasure over a routine settlement of ordinary employment litigation, a common occurrence across Texas state government. This cannot stand. There is no basis in law or history to transmute this disagreement over the appropriate resolution of pending litigation into an impeachable offense. The House's allegations in Article VIII are woefully insufficient to rise to that constitutional standard, and their charge is replete with factual and legal errors that would make trial on this accusation a pointless exercise. This Court should dismiss Article VIII.

BACKGROUND

On November 12, 2020, four of the Attorney General's former employees filed a lawsuit against the Office of the Attorney General regarding their termination from the agency. State law allows suit only against the agency itself, rather than any alleged wrongdoer, and the agency is the only possible defendant for any "whistleblower" lawsuit. *See* Tex. Gov't Code § 554.002(a) (imposing liability only on "[a] state or local governmental entity"); *see also id.* § 554.001(5). Attorney General Ken Paxton has never been a defendant in this litigation, and he is not, and could not be, personally liable to the so-called "whistleblowers" under state law. Indeed, no individual has ever been held personally liable under Chapter 554, nor could they be—State law imposes liability *only* on the agency.

Once in litigation, OAG determined that outside counsel was necessary to defend the lawsuit, and the Texas Legislature has provided approximately $600,000 for that defense. OAG's outside counsel promptly filed a plea to the jurisdiction challenging the district court's authority to hear the case. Those threshold jurisdictional issues *must* be decided before the case can proceed to fact discovery and to the merits. *See, e.g.*, *Bland Indep. Sch. Dist. v. Blue*, 34 S.W.3d 547, 553-54 (Tex. 2000). But litigation is time consuming, and the appellate proceedings have taken years.

Settlement discussions began in early January 2023. It was obvious that any successful settlement would need to include a monetary component, and it quickly became clear that the monetary terms would exceed the cap established by the legislature—only settlements under $250,000 may be funded by state agencies using their appropriated funds. General Appropriations Act ("GAA"), art. IX, § 16.04, 87th Leg., R.S. (2021). Recognizing that the legislative session presented an opportunity for seeking such an appropriation, the parties engaged in extensive discussions and hours of intensive mediation to reach a mediated settlement agreement. Exhibit A.

The mediated settlement agreement is expressly "contingent upon all necessary approvals for funding." Accordingly, it was the prerogative of the Legislature, not the Attorney General, to expend public funds on the settlement or not. *See* GAA, art. IX, § 16.04(b)(3). The Attorney General appeared with counsel at a House Appropriations Subcommittee hearing, and they answered questions from Representatives, explaining why the settlement was in the financial interests of the taxpayer because of the assuredly high litigation costs.[1]

When it became clear that the Legislature was not going to fund the mediated settlement agreement during this legislative session, the plaintiffs exhorted the budget reconciliation committee to reconsider that decision and allow OAG to pay for the settlement. Exhibit B. The plaintiffs told the Legislature that its decision "unfairly punish[ed]" the plaintiffs and was "disastrous public policy." *Id.* at 1. Expressing that they were "perplexed and dismayed by the Legislature's refusal to approve the tentative settlement," the plaintiffs reiterated that the Legislature was "breaking the promise the Texas Legislature made" with the Whistleblower Act. *Id.* at 2. And the plaintiffs underscored that "[t]he Texas Whistleblower Act allows whistleblowers to sue ***only*** their employing agency [and] ***does not allow*** for personal claims against the individual doing the firing or accused of corruption." *Id.* Crucially, the plaintiffs explained that "it is unfair to expect whistleblowers to not only discover and report wrongdoing, but also to further investigate that alleged criminal conduct through the civil justice system." *Id.*

Unmoved, the 88th Legislature refused to fund the settlement. Absent an appropriation, no "public funds" will change hands. But the House now accuses the Attorney General of "disregard of official duty" by "concealing his wrongful acts" via the settlement.

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[1] *See* Video, Appropriations Subcommittee on Articles I, IV, & V, 88th Leg., R.S. (Feb. 21, 2023), available at https://tlchouse.granicus.com/MediaPlayer.php?view_id=78&clip_id=23823.

STANDARD

"While impeachable offenses are not defined in the Constitution, they are very clearly designated or pointed out by the term 'impeachment,' which . . . connotes the offenses to be considered." *Ferguson v. Maddox*, 263 S.W. 888, 892 (Tex. 1924). An impeachable offense is a "grave official wrong[]" as historically understood in English and early American practice "by an examination of the Constitution, legal treatises, the common law[,] and parliamentary precedents." *Id*. It is "emphatically" not an "arbitrary and unrestrained" power to remove an elected official. *Id*. Rather, "[i]mpeachment is used only in extreme cases," *Ferguson v. Wilcox*, 28 S.W.2d 526, 533 (Tex. 1930), consistent with "such official delinquencies, wrongs, or malfeasances as justified impeachment according to" historical practices. *Ferguson*, 263 S.W. at 892. This Court determines whether an allegation rises to the historical level of an impeachable offense as a matter of law. *Id*. And this Court has the power to dismiss an Article for either failing to rise to that level or for any other defect. *Id*.; *see also* S. Journal, 88th Cong., 1st Sess. at 40-52 (2023), Rule 15.

ARGUMENT

I. Article VIII Does Not Allege an Impeachable Offense.

Our Constitution does not permit the House to impeach an official on any basis it sees fit. As the Supreme Court has explained, impeachable offenses under our Constitution include only those "established by the common law and the practice of the English Parliament and the parliamentary bodies in America." *Ferguson*, 263 S.W. at 892. Neither English, nor American, nor Texan history supports the notion that settling litigation within one's lawful authority, absent direct financial self-interest or fraud, rises to the level of an impeachable offense.

Blackstone described the gravity required for an act to become an impeachable offense. In his Commentaries, he described "public wrongs" to historically mean "crimes and misdemeanors."

4 William Blackstone, *Commentaries* *1. These were "act[s] committed, or omitted, in violation of a public law," supplying the truism that a public wrong could not be an act that complied with the law. *Id.* at *5. Impeachable offenses were a subset of public wrongs, reserved for unique transgressions against the State herself, such as "high treason." *See id.* at *74–75. When committed by a public official, a "high crime" could constitute an impeachable offense. Indeed, Blackstone ranked the "high court" of impeachment" in England first in "dignity" because it was "the most high and supreme court of criminal jurisdiction by the most solemn grand inquest," addressing "enormous offenders" among "the representatives of the people." *Id.* at *255-56, 258.

The Founders also understood "high crimes and misdemeanors" to include only particularly grave wrongs. Alexander Hamilton, agreeing with Blackstone's definition of "high crimes," explained that impeachable offenses were those that "relate[d] chiefly to injuries done immediately to the society" of the State. Federalist No. 65. Even opponents of the federal Constitution's impeachment power concurred that "[e]rrors in judgment, or want of capacity to discharge the duties of the office, can never be supposed to be included in these words, *high crimes and misdemeanors.*" *The Anti-Federalist*, Essays of Brutus XV, 185 (Herbert J. Storing, University of Chicago Press 1985) (emphasis original). Absent that restriction, where the legislature could expel any official from office for any reason it saw fit, the impeachment power would be "so incompatible with the genius of our institutions, that no lawyer or statesman would be inclined to countenance so absolute a despotism of opinion and practice." 1 J. Story, *Commentaries on the Constitution of the United States,* § 797, p. 563 (4th Ed. 1873).

This Court has historically hewed to this approach. When the House preferred twenty-five articles of impeachment against Land Commissioner McGaughey, it charged that McGaughey's sale of certain properties violated the land laws—but not that McGaughey did so out of a personal

financial interest. This Court concluded that was not enough: as McGaughey's counsel successfully argued, "the great State of Texas is pointing her heaviest artillery at something that does not even reach the magnitude of a snowbird." State of Tex. Senate, Proc. of the High Ct. of Impeachment on the Trial of W.L. McGaughey, Land Comm'r, S. 23, Reg. Sess. at li-lii (1893). The Court conclusively rejected every charge, with at least nineteen of twenty-seven members acquitting McGaughey. *Id.* at 169-178.

Likewise, the articles of impeachment against Judge J.B. Price did not allege self-enrichment. Judge Price was impeached on twelve articles. The articles accused him of "gross neglect of duties" when he approved payment reimbursements, like Sheriffs' mileage requests, that ultimately exceeded verifiable work-related expenses and costs. Judge Price was also accused of writing a literal blank check drawing on State funds for a witness fee. This Court recognized that these charges simply failed to qualify as "grave offenses" requiring the extraordinary remedy of impeachment. S. Journal, 42nd Cong., 2nd Sess. at 429-431 (1931). This Court dismissed six of the articles against Judge Price and acquitted him on the remaining six. *Id.* at 429-431, 684-691.

But this Court has drawn the line at more serious wrongs, such as embezzlement, fraud, perjury, or attempts to nullify the Constitution. Governor Ferguson was convicted of ten of the twenty-one articles preferred against him; the convictions included charges for embezzlement or self-enrichment, State of Tex. Senate, Rec. of Proc. of the High Ct. of Impeachment on the Trial of Hon. James E. Ferguson, Governor, S. 35, 2nd & 3rd Sess. at 767-769, 776, 778, 781-82, 789-791 (1917), concealing these self-interested transactions, *id.* at 772-774. 778-779, perjury, *id.* at 769-772, or an attempt to unconstitutionally abolish the University of Texas, *id.* at 782-789. This Court convicted Judge Carrillo for fraudulently charging and collecting money from the county for rental equipment that did not exist, and for renting county equipment for his personal use—

namely, the commercial operation of a ranch property he owned in partnership with another public official. State of Tex. Senate, Rec. of Proc. of the High Ct. of Impeachment on the Trial of O.P. Carrillo, Judge, S. 64, Reg. Sess. at 1560 (1975).

Article VIII does not allege anything that comes close to this level of seriousness, let alone with the required specificity. The most that can be said for Article VIII is that it registers the displeasure of the House over the parties' decision to settle and the plaintiffs' refusal to continue to prosecute their case; presumably the House would have preferred that a trial court continue some nebulous investigation into Attorney General Paxton, given the House's years of inaction since the so-called "whistleblowers" filed their claims. *Cf.* Ex. B at 2. That the House cannot free-ride on the work of private litigants is not a justification for the Attorney General's impeachment. And Article VIII cannot be defended as attacking an action by the Attorney General in his own financial self-interest: because the Attorney General never could have been personally liable under the Whistleblower Act, a settlement under that Act would have discharged the agency's—but only the agency's—liability. Article VIII does not contain any allegation of embezzlement, fraud, direct financial self-interest, or attempts to nullify the Constitution. Accordingly, it does not allege impeachable conduct.

The specific charge levied in Article VIII is equally insufficient to state an impeachable offense. The notions of "disregard of official duty" and "misuse of official powers" are akin to mere "[e]rrors in judgment, or want of capacity to discharge the duties of the office, [that] can never be supposed to be included in these words, *high crimes and misdemeanors.*" *The Anti-Federalist*, Essays of Brutus XV, 185 (Herbert J. Storing, University of Chicago Press 1985) (emphasis original). While it may be politically expedient for the House to grandstand about "disregard" for one's office, this is a solemn legal proceeding where more is required. Even if there

were any historical basis whatsoever to describe a litigation settlement as impeachable—and there is not—the character of the charge that the House has brought also falls short of the constitutional standard for impeachable offenses.

There is no justification for impeaching or removing the Attorney General from office because certain legislators wish he had not settled a case. Article VIII does not identify an impeachable offense, and it should therefore be dismissed.

II. Article VIII Is Legally and Factually Incorrect and Insufficient Under Any Pleading Standard.

Article VIII also reflects a lack of understanding by the House of the law and the circumstances of the mediated settlement agreement. Yet again, if the House had engaged in even a modicum of earnest investigation, it would never have preferred Article VIII as written. But the House is bound by its pleading, and its pleading is erroneous and insufficient.

The House begins with the obviously false pretense that the Attorney General "misused his official powers" and thereby somehow "conceal[ed] his wrongful acts." But the notion that anything about the so-called "whistleblower" complaints has been concealed is laughable on its face. The former employees' false reports were plastered all over every Texas media outlet, and they have been the subject of years of media attention and litigation, including the plaintiffs' Whistleblower Act petition. Moreover, Article VIII is silent as to how OAG's litigation strategy constitutes a "misuse of official powers" or a "disregard of official duty." The Attorney General of Texas and the lawyers under his control have "broad discretionary power in carrying out his responsibility to represent the State." *Perry v. Del Rio*, 67 S.W.3d 85, 92 (Tex. 2001) (citing *Terrazas v. Ramirez*, 829 S.W.2d 712, 722 (Tex. 1991)). The mediated settlement agreement is an economically sensible resolution of a potential liability against the State, and even the Plaintiffs concede that they had "not heard of anyone questioning the amount of the settlement. And how

could they?" Ex. B at 2. The notion that entering into a settlement which potentially saves the State millions of dollars constitutes a "misuse" of official power is a display of callous disregard by the House of its responsibility to steward the public fisc.

The House next alleges that the mediated settlement agreement "provides for payment of the settlement from public funds." But the agreement itself "provides" for nothing—it is the Legislature's sole prerogative to decide whether public funds will go to these former employees to settle their claims. Moreover, under the laws passed by the Legislature, there is no other option—as the plaintiffs themselves have explained, "[t]he Texas Whistleblower Act allows whistleblowers to sue ***only*** their employing agency [and] ***does not allow*** for personal claims against the individual doing the firing or accused of corruption." Ex. B at 2; Tex. Gov't Code § 554.002(a).

The errors continue. The House next alleges in Article VIII that the mediated settlement agreement "stayed the wrongful termination suit and conspicuously delayed the discovery of facts and testimony at trial." But this is wrong and misleading, because the lawsuit has been continuously ongoing from the time it was filed until the parties began settlement discussions. Any "delay" that the House complains about is attributable to the necessities of litigation, most recently, the Supreme Court of Texas's consideration of OAG's petition for review. The Governor, the Lieutenant Governor, and the Honorable Kent Hance all urged the Supreme Court to take up the case and decide the jurisdictional issues, and the Supreme Court was still considering that decision at the time the settlement discussions began. Indeed, Mr. Hance expressed his concern that "[w]hen a fundamental disagreement exists between elected officer and his appointed inferior officers, the function of government is stymied," and he said that failure to rule in favor of OAG "would place in jeopardy the very foundations of our governmental system and require elected officials to rely on advice that is adverse and hostile to their own duly established policy goals as a statewide

elected official."[2] Whatever the House's frustrations with the litigation process, it is plainly incorrect to attribute the delay solely to the Attorney General or the settlement discussions.

Finally, in its most baffling error, the House errs regarding the timing of events. The House's bald accusation that the settlement agreement somehow "deprived the electorate of its opportunity to make an information decision when voting for attorney general" defies logic. The settlement agreement, and any accompanying delays in the litigation, came *after* the voters overwhelmingly reelected Ken Paxton on November 8, 2022. It is simply impossible for any delay caused by the settlement agreement to have affected the information available to voters *months earlier*. And the notion that voters were somehow uninformed regarding the nature of the allegations against Ken Paxton—following years of breathless media coverage and a bruising 2022 election cycle, Exhibit C—is absurd.

Each of these errors on its own is sufficient to require the dismissal of Article VIII. Even when the prosecution is "not required to make its allegations as narrow as it did, due process require[s]" the prosecution "to 'prove the statutory elements that it has chosen to allege, not some other alternative statutory elements that it did not allege.'" *Geick v. State*, 349 S.W.3d 542, 547 (Tex. Crim. App. 2011). To the extent that a charge of "disregard of official duty" is legally cognizable in a Court of Impeachment—as explained above, it is not—the House must prove each element of Article VIII as written. It cannot do so, for the reasons explained above, and it would therefore be a waste of this Court's time to conduct a trial on this charge.

CONCLUSION

For the foregoing reasons, this Court should dismiss Articles VIII.

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[2] Letter of Amicus Curiae the Honorable Kent R. Hance in Support of Petition, Office of the Attorney General of the State of Texas, at 2 (Apr. 25, 2022), available at https://tinyurl.com/3mpyy8jp.

Respectfully submitted.

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CERTIFICATE OF SERVICE

This motion was served via email on the House Board of Managers' counsel, to wit: Rusty Hardin, rhardin@rustyhardin.com, and Dick DeGuerin, ddeguerin@aol.com, on August 5, 2023.

/s/ Christopher D. Hilton
Christopher D. Hilton

Exhibit A

FILED
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SUPREME COURT OF TEXAS
BLAKE A. HAWTHORNE, CLERK

No. 21-1027

In the Supreme Court of Texas

OFFICE OF THE ATTORNEY GENERAL OF TEXAS,
Petitioner,

v.

JAMES BLAKE BRICKMAN, ET AL.,
Respondents.

On Petition for Review
from the Third Court of Appeals, Austin

JOINT SECOND MOTION TO ABATE

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Counsel for Petitioner

To the Honorable Supreme Court of Texas:

Petitioner and respondents jointly move the Court to further defer consideration of the petition for review to enable the parties to finalize and fund a settlement agreement.

Petitioner filed the petition for review on January 5, 2022. The Court requested a response on February 18 and briefs on the merits on May 27. Petitioner's brief on the merits was filed on July 27, respondents' brief on the merits was filed on September 15, and petitioner's reply was filed on September 30. Petitioners and three of the four respondents initially moved the Court to abate the petition on January 26, 2023. The petition for review remains under consideration by the Court.

The parties have since executed a settlement agreement. Ex. 1. Because uncertainty regarding whether this Court will grant or deny the petition for review was a material factor affecting the parties' agreement, the parties jointly respectfully move the Court to further abate consideration of the petition pending the finalization and funding of that agreement. Following finalization and funding of the agreement, the parties will move the Court to dispose of this case pursuant to Texas Rule of Appellate Procedure 56.3. Should the parties prove unable to obtain funding, they will jointly move the Court to lift the abatement order.

Prayer

The Court should abate the petition for review.

Respectfully submitted.

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Attorney General of Texas

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Counsel for Petitioner

Certificate of Conference

On February 10, 2023, I conferred with Thomas A. Nesbitt, lead counsel for plaintiff James Blake Brickman, via tnesbitt@dnaustin.com; Don Tittle, counsel for plaintiff J. Mark Penley, via don@dontittlelaw.com; T.J. Turner, counsel for plaintiff David Maxwell, via tturner@cstrial.com; and Joseph R. Knight, counsel for plaintiff Ryan M. Vassar, via jknight@ebbklaw.com. Respondents agree with the relief requested and join the motion.

/s/ Judd E. Stone II
Judd E. Stone II

Certificate of Service

On February 10, 2023, this document was served electronically on Thomas A. Nesbitt, lead counsel for plaintiff James Blake Brickman, via tnesbitt@dnaustin.com; Don Tittle, counsel for plaintiff J. Mark Penley, via don@dontittlelaw.com; T.J. Turner, counsel for plaintiff David Maxwell, via tturner@cstrial.com; and Joseph R. Knight, counsel for plaintiff Ryan M. Vassar, via jknight@ebbklaw.com.

/s/ Judd E. Stone II
Judd E. Stone II

Certificate of Compliance

Microsoft Word reports that this document contains 227 words, excluding the portions of the document exempted by Rule 9.4(i)(1).

/s/ Judd E. Stone II
Judd E. Stone II

No. 21-1027

In the Supreme Court of Texas

OFFICE OF THE ATTORNEY GENERAL OF TEXAS,
Petitioner,

v.

JAMES BLAKE BRICKMAN, ET AL.,
Respondents.

On Petition for Review
from the Third Court of Appeals, Austin

APPENDIX

MEDIATED SETTLEMENT AGREEMENT

No. D-1-GN-20-006861

In the 250th District Court, Travis County, Texas

No. D-1-GN-20-006861

James Blake Brickman *et al.*,	§	In the 250th
	§	
Plaintiffs	§	
	§	
v.	§	District Court
	§	
Office of the Attorney General,	§	
	§	
Defendant	§	Travis County, Texas

Mediated Settlement Agreement

The undersigned (the "Parties") mediated with Patrick Keel. After consulting with their attorneys, the Parties and their attorneys now sign this document to memorialize the terms of their agreement under § 154.071 of the Texas Civil Practice & Remedies Code and Rule 11 of the Texas Rules of Civil Procedure.

Although the mediator assisted in drafting this agreement, the Parties and their attorneys thoroughly reviewed the document and made or had the opportunity to make any changes to it that the Parties desired. The Parties sign this agreement of their own free will and without duress, relying on their own understanding of the agreement and the advice of their attorneys.

The agreement is:

1. In exchange for mutual releases with all four plaintiffs, the Office of the Attorney General ("OAG") will pay a total of $3,300,000 and structure a portion of this sum as 27 months' back pay to Ryan Vassar and take such additional steps as are necessary for Vassar to receive 27 months' service credit toward the state retirement plan.

2. OAG will permanently remove this press release from its website: https://www.texasattorneygeneral.gov/news/releases/ag-paxton-releases-statement-recent-allegations.

3. A recital in the settlement agreement will state: "WHEREAS, Attorney General Ken Paxton accepts that plaintiffs acted in a manner that they thought was right and apologizes for referring to them as 'rogue employees.'"

4. The Parties will not ask that the 3rd Court of Appeals opinion issued October 21, 2021 be withdrawn.

5. OAG will take whatever steps necessary to lift the abatement in the SOAH proceeding and it will no longer oppose Mr. Maxwell's petition to correct his F5 report.

6. This agreement is contingent upon all necessary approvals for funding.

6. This agreement is contingent upon all necessary approvals for funding.

7. The Parties will jointly notify the Supreme Court of Texas that the Parties have agreed to settle and request that the court extend the abatement until all settlement papers have been finalized and funded.

8. The Parties will execute a formal settlement agreement containing these terms, as well as terms typical in settlements of this nature, including, but not limited to, no admission of liability or fault by any Party.

Signed on the dates indicated by the electronic signatures below.

Plaintiffs:

David Maxwell w/ permission by TJT

David Maxwell ("Maxwell")

Approved as to form by Maxwell's attorney:

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Approved as to form by Vassar's attorney:

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Mark Penley w/permission by DAT

Mark Penley ("Penley")

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Associated Case Party: David Maxwell

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Carlos RSoltero		carlos@ssmlawyers.com	2/10/2023 10:40:01 AM	SENT

Exhibit B

May 16, 2023

To the Honorable Members of the Conference Committee on HB 1
House Conferees

The Honorable Greg Bonnen	greg.bonnen@house.texas.gov
The Honorable Mary E. Gonzalez	Mary.Gonzalez@house.texas.gov
The Honorable Jacey Jetton	Jacey.Jetton@house.texas.gov
The Honorable Gary VanDeaver	Gary.VanDeaver@house.texas.gov
The Honorable Armando Walle	Armando.Walle@house.texas.gov

Senate Conferees

The Honorable Joan Huffman	Joan.Huffman@senate.texas.gov
The Honorable Brandon Creighton	brandon.creighton@senate.texas.gov
The Honorable Lois Kolkhorst	Lois.Kolkhorst@senate.texas.gov
The Honorable Robert Nichols	Robert.Nichols@senate.texas.gov
The Honorable Charles Schwertner	Charles.Schwertner@senate.texas.gov

Re: Office of the Attorney General Whistleblowers

To the Honorable Members of the
Conference Committee on HB 1:

We represent four of the eight brave public servants in the Office of the Attorney General ("OAG") who in September 2020 reported to the FBI and Texas Rangers that they believed that their boss, Attorney General Ken Paxton, was abusing his office and misusing the massive power of his agency to benefit a friend and donor. Within weeks, the whistleblowers who did not resign were fired by OAG. Our clients brought a claim against their public employer under the Texas Whistleblower Act.

As you know, our clients reached a tentative settlement with OAG, but that settlement requires legislative approval. After neither the Senate nor the House made a specific appropriation for the settlement, OAG agreed to pay the cost out of its budget, and we began attempting to discuss that option with lawmakers. Yesterday we were provided a draft of the budget conference committee report that includes a rider in OAG's budget that would prohibit OAG from paying not just our settlement, but *any settlement or judgment* relating to *any lawsuits or claims* filed under the Whistleblower Act. Not only does this rider unfairly punish our clients, it is also disastrous public policy.

When it enacted the Texas Whistleblower Act, the Texas Legislature made a solemn promise to public employees: if they are fired for reporting corruption, they can recover their lost wages and other damages from their employing agency. This safety net, and state employees' willingness to report corruption, are at stake. We are writing you to ask, once again, that you reconsider your position.

The Whistleblowers remain perplexed and dismayed by the Legislature's refusal to approve the tentative settlement – a routine action under any other circumstances. We have not heard of anyone questioning the amount of the settlement. And how could they? It amounts to around one quarter of one percent of the OAG's budget for the biennium and it is no windfall for the plaintiffs or their counsel. Likewise, we have not heard of anyone (other than Paxton) questioning the veracity or utility of our clients' actions. Once again, how could they? These brave public employees' reporting resulted in an FBI investigation that remains open and ongoing.

We have heard various other justifications for refusing to approve the funding, including opposition to the use of taxpayer funds to settle a claim based on Ken Paxton's conduct and a desire for our suit to continue so that Ken Paxton's actions can be subjected to further investigation. Neither of these justify breaking the promise the Texas Legislature made to protect Texans who are retaliated against for reporting criminal conduct by state officials and state agencies. The idea that some funds other than state funds should be used to pay the settlement is contrary to how the law actually works. The Texas Whistleblower Act allows whistleblowers to sue ***only*** their employing agency – in this case OAG. As you know, the Act ***does not allow*** for personal claims against the individual doing the firing or accused of corruption.

Furthermore, it is unfair to expect whistleblowers to not only discover and report wrongdoing, but also to further investigate that alleged criminal conduct through the civil justice system when other bodies, like the FBI, prosecutors, and even the Texas Legislature, are actually set up for that purpose. The state does not need our lawsuit to shine a light on the corruption at OAG; our clients' reporting already did that, and the FBI is actively investigating those allegations.

If the Legislature does not approve the tentative settlement between OAG and the whistleblowers, it will only serve to punish the individuals who were brave enough to sacrifice their careers for the good of all Texans by reporting criminal conduct by OAG to law enforcement. These individuals are: David Maxwell, a retired Texas Ranger and a 38-year veteran of the Department of Public Safety; Mark Penley, a career prosecutor; and Blake Brickman and Ryan Vassar, dedicated public servants in the midst of their careers with young families at home. All of these men were fired by OAG within days of reporting to law enforcement.

In addition to punishing the Whistleblowers, refusing to fund the tentative settlement will do untold damage to the Whistleblower Act itself and the policy behind its enactment – which is to encourage public employees to report corruption. A decision not to fund this settlement will remove any comfort future public employees have to report illegal conduct of state officials and agencies by calling into permanent question the safety net provided by the Act and give future officeholders a license to break the law. Surely none of the 1100 remaining employees at OAG, or any of the countless other state employees, will risk their financial livelihood to report corruption if the Legislature hangs our clients out to dry.

Once again, we implore you to consider the ramifications of this decision to not just our clients but to the State of Texas and to approve funding of the tentative settlement agreement. We, along with our clients remain available and willing to answer any questions you may have or to provide any additional information you may want.

Sincerely,

/s/ Joe Knight	/s/ Tom Nesbitt	/s/ T.J. Turner	/s/ Don Tittle
Counsel for	Counsel for	Counsel for	Counsel for
Ryan Vassar	James Blake Brickman	David Maxwell	Mark Penley

Exhibit C

EXHIBIT C

This Exhibit contains a chronological list of published articles and news stories reflecting the highly publicized nature of the allegations underlying each of the House's twenty Articles of Impeachment before the Attorney General's recent election. This list is not meant to be exhaustive.

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