

In re:
STEVEN DALE MULKEY

IN THE 115th DISTRICT COURT
UPSHUR COUNTY, TEXAS

PETITION TO CONVENE A COURT OF INQUIRY

TO THE HONORABLE LAUREN PARISH, JUDGE PRESIDING:

Candace Adams Dawson, Shannon Pope-Hill, and Angela Douglas Phillips, by and through counsel, ask this Court to request that the presiding judge of the First Administrative Judicial Region appoint a district judge to convene a court of inquiry pursuant to Chapter 52 of the Texas Code of Criminal Procedure. In support thereof, the Petitioners state as follows:

Facts

Steven Dale Mulkey began teaching and coaching in the Union Grove Independent School District in 1982. In his spare time (and even on work time), he was a sexual predator who targeted adolescent girls. Mulkey began sexually harassing and sexually molesting the Petitioners, who were students at Union Grove, when they were between the ages of 12 and 14. Mulkey grabbed the breasts and/or genital areas of the Petitioners and, in at least one case, engaged in sexual intercourse with a Petitioner. At all times relevant, the Petitioners were younger than 17 years of age.

In addition to physical acts of sexual abuse, Mulkey engaged in "grooming" behavior with his victims, sending them flowers or handwritten notes, or inviting them to run away with him. Mulkey also intimidated his victims, warning that no one would believe them if they reported him, that he would keep them from playing team sports, or that he knew where they lived.

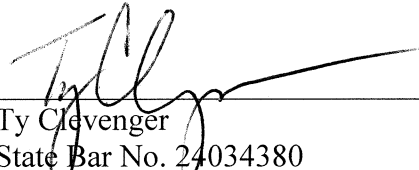
After leaving Union Grove, Mulkey moved from one school to another in various Northeast Texas school districts. On or about July 15, 2012, one of the Petitioners heard that Mulkey had been rehired by Union Grove. After she expressed her concerns to former

classmates, she learned that several of them also had been molested while they were students. Moreover, the Petitioners have since learned of other victims who are not yet willing to be identified.

Request

"When a judge of any district court of this state, acting in his capacity as magistrate, has probable cause to believe that an offense has been committed against the laws of this state, he may request that the presiding judge of the administrative judicial district appoint a district judge to commence a Court of Inquiry." Tex. Code Crim. Pro. §52.01(a). While the crimes against the current Petitioners fall outside the limitations period for sexual assault and indecency with a child, nothing in the foregoing statute requires that the alleged offenses be timely or otherwise subject to prosecution. Moreover, the Petitioners submit that an investigation will almost certainly reveal additional offenses, some of which may still be timely and subject to prosecution. So long as Mulkey remains in the public schools, he will present an intolerable threat to adolescent girls. For that reason, the Petitioners urge the court to request the appointment of a district judge to convene a court of inquiry.

Respectfully submitted,



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