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April 20, 2015

The Hon. Jennifer Bennett, Judge  
265<sup>th</sup> District Court of Dallas County  
Dallas, Texas 75207

Re: Attorney General Ken Paxton

Judge Bennett:

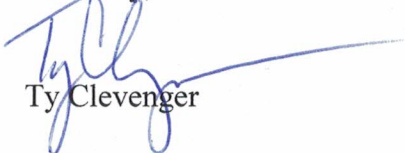
I write to request that you or one of your colleagues file a petition for a court of inquiry pursuant to Chapter 52 of the Texas Code of Criminal Procedure.<sup>1</sup> I have enclosed several copies of a letter to the grand jury, and that letter outlines the evidence that Attorney General Ken Paxton criminally violated the Texas Securities Act.

I have also enclosed a copy of an email exchange with Asst. District Attorney Brian Garrison. I had requested a list of the names of grand jurors so I could write to them directly, and I provided a copy of a 2006 opinion from the Office of the Attorney General (GA-0422) declaring that the names of grand jurors are public information. Prior to that, I had informed the DA's office that I wanted to write to the grand jurors about Mr. Paxton. As you can see from the email exchange, it appears that the DA's office is trying to stonewall my efforts. Accordingly, I ask that you provide the enclosed letters directly to the grand jurors.

You may have read in the *Dallas Morning News* that Collin County DA Greg Willis asked the Texas Rangers to investigate Mr. Paxton. While that is a small step in the right direction, Mr. Willis still has not recused himself from the case (even though he and Mr. Paxton are partners in several joint business ventures), thus he still retains the ability to interfere. A court of inquiry would solve the problem of conflicted prosecutors, because the presiding judge would have the right to appoint an attorney pro tem to assist in the investigation. If the court of inquiry concluded that no violations occurred in Dallas County, it could still refer the matter to the Collin County grand jury.

Thank you in advance for your consideration.

Sincerely,



Ty Clevenger

cc: Dallas County District Judges

<sup>1</sup> Chapter 52 is not limited to criminal district judges; according to its terms, the chapter applies to "a judge of any district court of this state." See Tex. Code Crim. Proc. Art. 52.01(a).