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March 25, 2015

District Judges
Collin County Courthouse
2100 Bloomdale Road
McKinney, Texas 75071
Via facsimile and/or email

Re: Ken Paxton / Greg Willis

District Judges of Collin County:

I have attached copies of a March 6, 2015 letter to the 199th District Court grand jury and a March 21, 2015 letter to District Attorney Greg Willis. Per those letters, Mr. Willis has a serious conflict of interest and may be stonewalling a criminal investigation of his friend and business partner, Attorney General Ken Paxton.

Mr. Willis has not responded to those letters nor has he recused himself. Insofar as an investigation of Mr. Paxton's business practices would result in an investigation of Mr. Willis's business practices, Mr. Willis is disqualified from the case. *In re Guerra*, 235 S.W.3d 392, 414 (Tex.App.–Corpus Christi 2007, *orig. proceeding*), disapproved on other grounds by *In re Blevins*, --- S.W.3d ----, 2013 WL 5878910 (Tex. 2013). Under such circumstances, the district court may appoint a district attorney *pro tem. Id.*

In my latest post on LawFlog.com, I noted that the current grand jury was chosen by the court and does not appear to represent a broad segment of the county's eligible voters. I ask that one of you convene a special grand jury – chosen at random – and appoint a district attorney *pro tem* to investigate. Alternatively, I ask that one of you file a petition for a court of inquiry pursuant to Chapter 52 of the Texas Code of Criminal Procedure.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ty Clevenger', with a long horizontal flourish extending to the right.

Ty Clevenger