

THE TRANSPARENCY PROJECT

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August 23, 2018

Ms. Linda Acevedo, Chief Disciplinary Counsel
State Bar of Texas
P.O. Box 13287
Austin, Texas 78711

Via electronic submission

Ms. Acevedo:

I have attached a copy of my August 2, 2018 grievance against Jay B. Goss (SBOT #08222600) and three other attorneys (Exhibit 1), and I wish to supplement the grievance against Mr. Goss.

On August 8, 2018, Mr. Goss filed a notice of death (Exhibit 2) for Susan Hargrave in *Southside Ranch, LLC v. The Known and Unknown Heirs of Joshua Washington, Sr.*, Cause No. 16-000649-CV-85 (85th District Court of Brazos County). At the same time, he purported to file an answer (Exhibit 3) on her behalf. Note that Mr. Goss did not file an answer on behalf of her estate or its representative. Instead, he purported to have an attorney-client relationship with a dead woman.

This is but the latest example of Mr. Goss's willingness to file unauthorized pleadings on behalf of people who are not his clients. Furthermore, I strongly suspect that *SouthSide Ranch, LLC* (alternately known as *Gregg Falcone v. The Known and Unknown Heirs of Joshua Washington, Sr.*) was an attempt to perpetrate real estate fraud. I have spoken with counsel for some of the defendants in that case, and I was informed that those defendants may soon file counter-claims or third-party claims for fraud. I recommend that your investigators speak with the Defendants' attorneys.

I have attached an August 22, 2018 letter to the State Commission on Judicial Conduct (Exhibit 4) that provides useful background information. If you wish, I can provide more information about the potential fraud, as well as Mr. Goss's role in it. Either way, Mr. Goss should know that he cannot have an attorney-client relationship with a dead person, and his attempt to file pleadings on the decedent's behalf (rather than her estate or its representative) is a fraud unto itself.

Respectfully,



Ty Clevenger
Executive Director
The Transparency Project