

No. ~~121-90~~ 1762555-91

THE STATE BAR OF TEXAS  
V.  
ROBERT J. WILSON

§ IN THE DISTRICT COURT OF  
§  
§ JOHNSON COUNTY, TEXAS  
§ 18th JUDICIAL DISTRICT

DISCIPLINARY PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner, the State Bar of Texas, complains of Respondent, ROBERT J. WILSON, showing the Court:

I.

Petitioner brings this disciplinary action pursuant to the State Bar Act, Tex. Gov't Code Ann. §81.078 (Vernon 1986), and the State Bar Rules art. X, §26, (Vernon Supp. 1987), seeking the compulsory discipline of Respondent for having been convicted of a serious crime.

II.

Respondent is now, and has been at all times material hereto, an attorney admitted to practice in the State of Texas and a member of the State Bar of Texas. Respondent is a resident of Johnson County, Texas. Steven D. Peterson, 114 West 7th, Suite 1200, Austin, Texas 78701, Attorney for Respondent, will accept service on behalf of Respondent Wilson.

III.

On or about January 23, 1990, Respondent, Robert J. Wilson, was convicted of a felony involving moral turpitude, to wit: third degree forgery, styled The State of Texas v. Robert J. Wilson, Cause No. 26,214, upon the docket of the 18th Judicial District Court of Johnson County, Texas. Copies of the Judgment, Conditions of Probation, Docket Sheet and indictment are attached hereto and

FILED  
JAN 23 1990  
JUDICIAL DISTRICT  
CLERK

DEPUTY

47

incorporated herein by reference for all purposes. The Court assessed a punishment of three years probation and \$2,150.00 in restitution.

WHEREFORE, PREMISES CONSIDERED, Petitioner prays that Respondent be cited to appear and answer herein and, upon hearing of this cause, that the Respondent, Robert J. Wilson, be ordered disbarred or in the alternative suspended from the practice of law during the pendency of his probation in Cause No. 26,214, and that Petitioner have such other and further relief as may be proper and authorized by law, including all costs of court.

Respectfully submitted,

Steven D. Peterson  
General Counsel

Linda A. Acevedo  
Assistant General Counsel

STATE BAR OF TEXAS  
P.O. Box 12487  
Austin, Texas 78711  
(512) 463-460

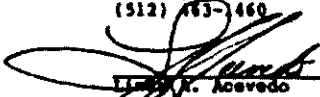

  
Linda A. Acevedo  
State Bar Card No. 00029025  
ATTORNEYS FOR PETITIONER

EXHIBIT "A".

IN THE STATE OF TEXAS vs. Robert J. Wilson  
IN THE DISTRICT COURT OF JOHNSON COUNTY. NO. 26214  
18TH JUDICIAL DISTRICT OF TEXAS September TERM A.D. 19 87  
DATE January 27 19 90

10. Defendant is to surrender within 14 days, his Law License to the State or Supreme Court of Texas.


  
\_\_\_\_\_  
PRESIDING JUDGE  
HONORABLE C.C. "KIT" COOKE

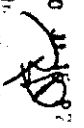
Copy read and received this date: 1-29-90

  
\_\_\_\_\_  
DEFENDANT

  
\_\_\_\_\_  
PROBATION OFFICER

Date 1/26/90  
This is a copy that the  
file and correct copy  
is a true and correct copy  
Betty Cooke, District Clerk  
County of Johnson, Texas  
18843 77 CO

CLERK OF DISTRICT COURT  
JOHNSON COUNTY, TEXAS  
30 JUN 24 01:42  
DEPUTY  
BY 

JUN 24 1990  
DISTRICT CLERK  
BY 

CONDITIONS OF PROBATION  
THE STATE OF TEXAS

IN THE DISTRICT COURT  
18<sup>TH</sup> JUDICIAL DISTRICT

VS.  
Robert J. Wilson

CAUSE NUMBER 26214 JOHNSON COUNTY, TEXAS  
Sept. TERM A.D. 1927

DEFENDANT'S ATTORNEY Bob GLASGOW

In accordance with the authority conferred by the Adult Probation and Parole Law of the State of Texas,  
you have been placed on Probation on this 23<sup>rd</sup> day of JANUARY  
1928, for a period of 3 years, for the offense of FERRY BY MAKING  
by the Honorable G.C. "Kit" Cooke, Judge, 18th Judicial District Court.

IT IS THE ORDER OF THE COURT THAT YOU SHALL COMPLY WITH THE FOLLOWING TERMS AND  
CONDITIONS OF PROBATION:

1. Commit no offense against the laws of this State or of any other State or of the United States... (report any arrest including traffic tickets within ten days to the Adult Probation Officer).
2. Avoid injurious or vicious habits and totally abstain from the illegal use of controlled substances or alcoholic beverages.
3. Avoid association with persons who have criminal records and those of disreputable or harmful character.
4. Avoid places of disreputable or harmful character.
5. Report to the Probation Officer as directed by the Judge or Probation Officer and obey all rules and regulations of the Johnson/Somervell County Community Supervision and Corrections Department. Report beginning on the 10th day of each month beginning in FEBRUARY, 1928, unless otherwise directed.
6. Permit the Probation Officer to visit you at your home or elsewhere.
7. Work faithfully at suitable employment as far as possible and notify the Probation Officer before changing your employment or quitting your job.
8. Remain within the limits of Johnson/Somervell County, Texas and leave the county only with the permission of the Adult Probation Officer.
9. Keep the Adult Probation Officer advised of your residence address at all times and obtain his permission before changing places of residence.
10. Support your dependents.
11. Pay a probation fee of \$ 40.00 to the Johnson/Somervell County Community Supervision and Corrections Department on or before the 10th day of each month beginning FEBRUARY, 1928.
12. Pay to and through the Johnson/Somervell County Community Supervision and Corrections Department the following:
  - A. Court Cost of 140.00 due within 60 days / months from JANUARY 23-1928.
  - B. Fine of \_\_\_\_\_ due within \_\_\_\_\_ days / months from \_\_\_\_\_ 19\_\_\_\_.
  - C. Attorney Fee of \_\_\_\_\_ due within \_\_\_\_\_ days / months from \_\_\_\_\_ 19\_\_\_\_.
  - D. Remission of \$ 130.00 to be paid within 60 days / months at the rate of 107.50 each month on or before the 10th day of each month beginning FEBRUARY, 1928.
  - E. Restitution of \_\_\_\_\_ to be paid jointly and severally defendants parties being \_\_\_\_\_ to be paid within \_\_\_\_\_ days / months at \_\_\_\_\_ each month on or before the 10th day of each month beginning in \_\_\_\_\_ 19\_\_\_\_.
  - F. Other Cost of \_\_\_\_\_ within \_\_\_\_\_ days / months from \_\_\_\_\_ 19\_\_\_\_.
13. The Court also orders you to comply with the following additional or special conditions:
  - A. Defendant is to submit to blood and / or urinalysis tests for alcohol and / or drug screenings at the discretion of a Probation Officer at any time and unannounced, at the expense of the defendant.
  - B. Other special conditions DEFENDANT IS TO MAKE 400 HOURS OF COMMUNITY SERVICE TO BE COMPLETED BY JANUARY 22, 1928.
  - C. Defendant is to serve \_\_\_\_\_ days in its County jail to begin \_\_\_\_\_ 19\_\_\_\_.

[Signature]  
PRESIDENT JUDGE

This day, a true copy of this Order was furnished and explained to me.  
Copy read and received this day: 1-29-28 [Signature]  
DEPENDANT

FILED  
DISTRICT CLERK  
JOHNSON COUNTY  
30 JUN 24 PM 1928  
DEPUTY  
[Signature]

[Signature]  
PROBATION OFFICER  
[Signature]  
Court Officer

THE STATE OF TEXAS  
VS.  
ROBERT J. WILSON

NO. 26214

IN THE 18th DISTRICT  
COURT OF FINNICK COUNTY, TEXAS

JUDGMENT ON JURY VERDICT OF GUILTY  
PUNISHMENT FIXED BY COURT OR JURY—~~NO~~ PROBATION GRANTED

Judge Presiding : C. C. (KIT) COOKE Date of Judgment : JAN. 23, 1990  
Attorney for State : DAN DENT Attorney for Defendant : ROBERT GLASCO  
Offense : FORGERY-PASSING  
Degree : THIRD Date Offense Committed : APRIL 16, 1987  
Charging Indictment / Information :  
Plea : NOT GUILTY  
Jury Verdict : GUILTY Foreman : CHARLES COLLIER  
Plea to Enhancement Paragraph(s) : N/A Enhancement Paragraph(s) : N/A  
Findings on Use of Deadly Weapon : N/A  
Punishment Assessed by : COURT  
Date Sentenced Imposed : JANUARY 23, 1990 Fines : \$148.50  
Punishment and Place of Confinement : 3 years T. D. C., Probated Date in Confinement : 1-23-90  
Time Credit : NONE Total Amount of Restitution / REPARATIONS : \$2,150.00  
Restitution to be Paid To :  
Name :  
Address :

THIS DAY the court was called for trial, and the State appeared by its Attorney, DAN DENT, and the Defendant, ROBERT J. WILSON, having been duly arraigned, appeared in person. In open court, the court also being present, whereupon both parties announced ready for trial and the said Defendant, ROBERT J. WILSON, in open court, pleaded not guilty to the charge contained in the indictment herein; thereupon a jury of good and lawful men and women, to-wit: CHARLES COLLIER and eleven others, was duly selected, impaneled and sworn, who, having heard the indictment read, and the Defendant's plea of not guilty therein, and having heard the evidence submitted, and having been duly charged by the Court, retired in charge of the proper officers to consider of their verdict, and afterward was brought into open court by the proper officer, the Defendant and his counsel being present, and in due form of law returned into open court the following verdict, which was received by the Court, and is here now entered upon the minutes of the Court, to-wit: **WE, THE JURY, find the Defendant, ROBERT J. WILSON, guilty of the offense of FORGERY as set forth in the indictment.**

Whereupon, the Defendant elected to have his punishment assessed by the COURT

DEFENDANT'S SIGNATURE  
/

\*And the Court having heard all the evidence submitted for the State and the Defendant and arguments of Counsel is of the opinion and so finds that the punishment of the Defendant should be by confinement in The Texas Department of Corrections for a term of **Three (3) years, Probated**

IT IS THEREFORE CONSIDERED AND ADJUDGED by the Court that the Defendant **ROBERT J. WILSON** is guilty of the offense of **FORGERY** as faced by the jury, and that he be punished by confinement in the Texas Department of Corrections for a term of **THREE (3) years, Probated** and that the State of Texas do have and recover of the said Defendant **\$2,150.00** all costs in this proceeding, assessed, according to statute

\*Seize if not applicable  
Fingerprint from



PRESIDING JUDGE

1-26-90

DATE SIGNED

January 2A, 1990

Notice of Appeal

Standard Forming JCM-DC (06/79) 1029

Sign of Defendant  
JUDCS.22 (Rev. 1989)

Against The Peace And Dignity Of The State.

*Jean Watson*  
Foreman Of The Grand Jury

Vol 1274 page 131

FILED FOR RECORD <sup>115</sup> RA

APR 16 87  
COUNTY CLERK JOHNSON COUNTY  
BY CO DEPUTY

STATE OF TEXAS  
COUNTY OF JOHNSON  
I hereby certify that this instrument was FILED on the date and at the time  
stamped herein by me and was duly RECORDED in the OFFICIAL PUBLIC  
RECORDS OF JOHNSON COUNTY, TEXAS, on the Volume and Page as  
shown herein.



Robby S Goodnight  
ROBBY S. GOODNIGHT, County Clerk  
Johnson County, Texas

APR 15 1987  
DISTRICT CLERK

FILED

ATTACHMENT 111

1274 130

EXHIBIT "A"

~~1274~~ 889

All that certain lot, tract or parcel of land out of the David Hunter Survey, Abet. 348, Johnson County, Texas, being a portion of that certain 10.18 acre tract of land as conveyed by Minnie Marie Anderson et al to Robert J. Wilson and Jack Matthews by deed recorded in Volume 867, Page 723, Deed Records, Johnson County, Texas, and being more particularly described by metes and bounds as follows:

BEGINNING at an iron rod on the west line of County Road 886 that bears North 1 degree 11 minutes 00 seconds East, 167.4 feet from the southwest corner of said 10.18 acre tract of land recorded in Volume 867, Page 723, Deed Records, Johnson County, Texas;

THENCE - North 1 degree 11 minutes 00 seconds East, a distance of 30.8 feet to an iron rod for a corner;

THENCE - North 89 degrees 46 minutes 01 seconds East, a distance of 419.91 feet to an iron rod for a corner;

THENCE - South 89 degrees 03 minutes 07 seconds East, a distance of 395.77 feet along the south line of that certain tract of land as conveyed by R. J. Dees to Robert J. Wilson by deed recorded in Volume 868, Page 284, Deed Records, Johnson County, Texas, to an iron rod for a corner;

POINT OF BEGINNING

THENCE - South 08 degrees 56 minutes 12 seconds West, a distance of 209.48 feet to an iron rod for a corner on the south line of said Minnie Marie Anderson tract;

THENCE - North 88 degrees 44 minutes 30 seconds West, a distance of 395.69 feet along said south line to an iron rod for a corner;

THENCE - North 0 degrees 54 minutes 58 seconds East, a distance of 177.32 feet to an iron rod for a corner;

THENCE - South 89 degrees 58 minutes 07 seconds West, a distance of 419.84 feet to the point of beginning and containing 2.199 acres of land more or less.

NO. 11, 15 P. 130  
DISTRICT

ATTACHMENT III





*Return To:* ROBERT J. WILSON & ASSOCIATES  
P.O. DRAWER 1088  
817 SW WILSON BLVD  
DALLAS, TX 75208

ATTACHMENT III

07215

1274-129

RELEASE OF LIEN

A

THE STATE OF TEXAS  
COUNTY OF JOHNSON

KNOW ALL MEN BY THESE PRESENTS

THAT the undersigned, of the County of Johnson, and State of Texas, the present legal and equitable owner and holder of that one certain promissory note in the original principal sum of \$55,412.29, dated September 15th, 1956, executed by Robert J. Wilson payable to the order of FIRST NATIONAL BANK OF JOSHUA, more fully described in a Deed of Trust, duly recorded in Volume 1224, Page 883, of the Real Records of Johnson County, Texas; said note being secured by Deed of Trust lien against the following described property, to-wit:

See attached Exhibit "A" herewith and made a part hereof;

for and in consideration of the full and final payment of all indebtedness secured by the aforesaid lien and liens, the receipt of which is hereby acknowledged, has released and discharged, and by these presents hereby RELEASES and DISCHARGES, the above described property from all liens held by the undersigned securing said indebtedness including the Deeds of Trust recorded in Volume 1040, Page 450 and Volume 1136, Page 342, Real Records, Johnson County, Texas.

EXECUTED this 8th day of December, 1956.

*Roland Walden*  
FIRST NATIONAL BANK IN JOSHUA  
BY: ROLAND WALDEN, PRESIDENT

RECORDED  
INDEXED  
DEC 15 1956

*Roland Walden*  
NOTARY PUBLIC  
STATE OF TEXAS  
COUNTY OF JOHNSON

This instrument was acknowledged before me on this the 8 day of December, 1956, by ROLAND WALDEN, President of FIRST NATIONAL BANK IN JOSHUA, a National Banking Corporation, on behalf of said Corporation.

NOTARY PUBLIC  
STATE OF TEXAS

*Ray Hinstley*  
NOTARY PUBLIC, STATE OF TEXAS

*Ray Hinstley*  
Notary's Printed Name

My Commission expires: 10-22-57

ATTACHMENT III

And,

On or about the 16th day of April, 1987, in the County of Johnson, State of Texas, Robert J. Wilson did then and there unlawfully and intentionally, with intent to defraud and harm another, make a writing so that it purported to be the act of Ray Hinkley, who did not authorize the act and said writing was a release of lien of the tenor following:

SEE ATTACHMENT III

via 1274 page 131

FILED FOR RECORD 11:13 AM

APR 16 87  
COUNTY CLERK JOHNSON COUNTY  
BY CO DEPUTY

STATE OF TEXAS  
COUNTY OF JOHNSON  
I hereby certify that this instrument was FILED on the date and at the time stamped herein by me and was duly RECORDED in the OFFICIAL PUBLIC RECORDS OF JOHNSON COUNTY, TEXAS, in the Volume and Page as shown herein.



Robert B Goodnight  
ROBERT B GOODNIGHT, County Clerk  
Johnson County, Texas

11:15 PM  
APR 16 1987

ATTACHMENT 11

TRINITY "A"

~~Vol 1224 page 889~~

All that certain lot, tract or parcel of land out of the David Hunter Survey, Abat. 148, Johnson County, Texas, being a portion of that certain 10.18 acre tract of land as conveyed by Winnie Marie Anderson et al to Robert J. Wilson and Jack Matthews by deed recorded in Volume 867, Page 723, Deed Records, Johnson County, Texas, and being more particularly described by notes and bounds as follows:

**BEGINNING** at an iron rod on the west line of County Road 800 that bears North 1 degree 11 minutes 00 seconds East, 167.4 feet from the southwest corner of said 10.18 acre tract of land recorded in Volume 867, Page 723, Deed Records, Johnson County, Texas;

**THENCE** - North 1 degree 11 minutes 00 seconds East, a distance of 19.0 feet to an iron rod for a corner;

**THENCE** - North 89 degrees 52 minutes 01 seconds East, a distance of 439.31 feet to an iron rod for a corner;

**THENCE** - South 89 degrees 05 minutes 02 seconds East, a distance of 395.77 feet along the south line of that certain tract of land as conveyed by R. J. Deas to Robert J. Wilson by deed recorded in Volume 868, Page 184, Deed Records, Johnson County, Texas, to an iron rod for a corner;

**THENCE** - South 88 degrees 56 minutes 28 seconds West, a distance of 209.45 feet to an iron rod for a corner on the south line of said Winnie Marie Anderson tract;

**THENCE** - North 70 degrees 44 minutes 50 seconds West, a distance of 395.69 feet along said south line to an iron rod for a corner;

**THENCE** - North 0 degrees 54 minutes 58 seconds East, a distance of 177.52 feet to an iron rod for a corner;

**THENCE** - South 89 degrees 56 minutes 07 seconds West, a distance of 448.04 feet to the point of beginning and containing 2.199 acres of land more or less.

90 JUN 15 1924  
DISPATCH



*Return To:*

ROBERT J. WILSON & ASSOCIATES  
P.O. DRAWER 1058  
617 SW WILSHIRE BLVD  
DUNLEON, TX 70028

PERMITS 13

116-115

1274 129

RELEASE OF LIEN

A

THE STATE OF TEXAS  
COUNTY OF JOHNSON

KNOW ALL MEN BY THESE PRESENTS

THAT the undersigned, of the County of Johnson, and State of Texas, the present legal and equitable owner and holder of that one certain promissory note in the original principal sum of \$55,412.29, dated September 13th, 1986, executed by Robert J. Wilson payable to the order of FIRST NATIONAL BANK OF JOSHUA, more fully described in a Deed of Trust, duly recorded in Volume 1224, Page 883, of the Real Records of Johnson County, Texas; said note being secured by Deed of Trust lien against the following described property, to-wit:

See attached Exhibit "A" herewith and made a part hereof; for and in consideration of the full and final payment of all indebtedness secured by the aforesaid lien and liens, the receipt of which is hereby acknowledged, has released and discharged, and by these presents hereby RELEASES and DISCHARGES, the above described property from all liens held by the undersigned securing said indebtedness including the Deeds of Trust recorded in Volume 1040, Page 450 and Volume 1136, Page 342, Real Records, Johnson County, Texas.

EXECUTED this 8th day of December, 1986.

*Roland Walden*  
FIRST NATIONAL BANK IN JOSHUA  
BY: ROLAND WALDEN, PRESIDENT

*Ray Shackley*  
NOTARY PUBLIC, STATE OF TEXAS  
COUNTY OF JOHNSON

This instrument was acknowledge before me on this the 8 day of December, 1986, by ROLAND WALDEN, President of FIRST NATIONAL BANK IN JOSHUA, a National Banking Corporation, on behalf of said Corporation.

NOTARY PUBLIC  
STATE OF TEXAS

*Ray Shackley*  
NOTARY PUBLIC, STATE OF TEXAS

*Ray Hinstley*  
Notary's Printed Name

My Commission expires: 10-23-88

ATTACHMENT II

And,

On or about the 16th day of April, 1967, in the County of Johnson, State of Texas, Robert J. Wilson did then and there unlawfully and intentionally, with intent to defraud and harm another, make a writing so that it purported to be the act of Carolyn Naughton, who did not authorize the act and said writing was a release of lien of the tenor following:

SEE ATTACHMENT II



Vol 1274 PAGE 131

FILED FOR RECORD <sup>113</sup> 12

APR 16 87  
COUNTY CLERK JOHNSON COUNTY  
BY CO DAUGHTY

STATE OF TEXAS  
COUNTY OF JOHNSON  
I hereby certify that this instrument was FILED on the 16th day of the Month  
stamped herein by me and was duly RECORDED in the OFFICIAL PUBLIC  
RECORDS OF JOHNSON COUNTY, TEXAS, in the Volume and Page as  
shown herein.



Robby B Goodnight  
ROBBY B. GOODNIGHT, County Clerk  
Johnson County, Texas

INSTRUMENT NO. 113

90 APR 15 P2:47

FILED

ATTACHMENT 1

vn 1274 p. 130

EXHIBIT "A"

~~vn 1224 p. 880~~

All that certain lot, tract or parcel of land out of the David Hunter Survey, Abot. 342, Johnson County, Texas, being a portion of that certain 10.10 acre tract of land as conveyed by Minnie Marie Anderson et al to Robert J. Wilson and Jack Matthews by deed recorded in Volume 867, Page 723, Deed Records, Johnson County, Texas, and being more particularly described by metes and bounds as follows:

BEGINNING at an iron rod on the west line of County Road 860 that bears North 1 degree 11 minutes 00 seconds East, 167.4 feet from the southwest corner of said 10.10 acre tract of land recorded in Volume 867, Page 723, Deed Records, Johnson County, Texas;

THENCE - North 1 degree 11 minutes 00 seconds East, a distance of 30.0 feet to an iron rod for a corner;

THENCE - North 89 degrees 46 minutes 01 seconds East, a distance of 439.91 feet to an iron rod for a corner;

THENCE - South 89 degrees 03 minutes 02 seconds East, a distance of 395.77 feet along the north line of that certain tract of land as conveyed by R. J. Dees to Robert J. Wilson by deed recorded in Volume 868, Page 284, Deed Records, Johnson County, Texas, to an iron rod for a corner;

THENCE - South 80 degrees 36 minutes 24 seconds West, a distance of 209.48 feet to an iron rod for a corner on the south line of said Minnie Marie Anderson tract;

THENCE - North 88 degrees 44 minutes 50 seconds West, a distance of 395.69 feet along said south line to an iron rod for a corner;

THENCE - North 0 degrees 34 minutes 30 seconds East, a distance of 177.52 feet to an iron rod for a corner;

THENCE - South 89 degrees 35 minutes 07 seconds West, a distance of 440.04 feet to the point of beginning and containing 2.199 acres of land more or less.

30 JUL 15 PM '47  
J. B. ...

ATTACHMENT I

RELEASE OF LIEN

A

THE STATE OF TEXAS  
COUNTY OF JOHNSON

KNOW ALL MEN BY THESE PRESENTS

THAT the undersigned, of the County of Johnson, and State of Texas, the present legal and equitable owner and holder of that one certain promissory note in the original principal sum of \$55,412.29, dated September 15th, 1986, executed by Robert J. Wilson payable to the order of FIRST NATIONAL BANK OF JOSHUA, were fully described in a Deed of Trust, duly recorded in Volume 1224, Page 885, of the Real Records of Johnson County, Texas; said note being secured by Deed of Trust lien against the following described property, to-wit:

See attached Exhibit "A" herewith and made a part hereof, for and in consideration of the full and final payment of all indebtedness secured by the aforesaid lien and liens, the receipt of which is hereby acknowledged, has released and discharged, and by these presents hereby RELEASES and DISCHARGES, the above described property from all liens held by the undersigned securing said indebtedness including the Deeds of Trust recorded in Volume 1040, Page 450 and Volume 1136, Page 342, Real Records, Johnson County, Texas.

EXECUTED this 8th day of December, 1986.

*Roland Walden*  
FIRST NATIONAL BANK IN JOSHUA  
BY: ROLAND WALDEN, PRESIDENT

*Roy H. Hestley*  
NOTARY PUBLIC, STATE OF TEXAS  
COUNTY OF JOHNSON

This instrument was acknowledged before me on this the 8 day of December, 1986, by ROLAND WALDEN, President of FIRST NATIONAL BANK IN JOSHUA, a National Banking Corporation, on behalf of said Corporation.

NOTARY PUBLIC  
STATE OF TEXAS

*Roy Hestley*  
NOTARY PUBLIC, STATE OF TEXAS

*Roy Hestley*  
Notary's Printed Name

My Commission expires: 10-22-87

ATTACHMENT 1



*Return To:*

ROBERT J. WILSON & ASSOCIATES  
P.O. DRAWER 1058  
817 SW WILSON BLVD  
DALLAS, TX 75209

1 44-10000-1

26214

The State of Texas vs. ROBERT J. WILSON

Charge: FORGERY BY MAKING

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURY, for the County of Johnson, State of Texas, duly returned, empaneled, sworn, charged, and organized as such at the September/October Term A.D. 19... Judicial District Court for said County, upon their oath, present in and to said court at said term...

ROBERT J. WILSON

hereinafter styled Defendant, on or about the 16th day of April... and before the presentation of this indictment, in the County and State aforesaid, did then and there unlawfully and intentionally, with intent to defraud and harm another, make a writing which purported to be the act of Roland Walden, who did not authorize the same, and said writing was a release of lien of the tenor following:

SEE ATTACHMENT I

WILLIAMS  
37 OCT 11 1966  
DEPUTY  
BY [Signature]

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Date  
This is to certify that  
is a true and correct  
Robby Cooke, Clerk  
Clarence Johnson  
(SEAL) by

26214  
This is to certify that  
is a true and correct  
Sally Cooke, Clerk  
Clarence Johnson, Co. Clerk  
(SEAL) by [Signature]

NO. 17-128388-90

THE STATE BAR OF TEXAS  
VS.  
ROBERT J. WILSON

§  
§  
§  
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IN THE DISTRICT COURT OF  
TARRANT COUNTY, TEXAS  
17TH JUDICIAL DISTRICT

RESPONDENT'S ANSWER TO CONTEMPT MOTION AND HIS COUNTERCLAIM

TO THE HONORABLE COURT:

Now comes Robert J. Wilson, Respondent herein and in answer to the contempt allegations set forth by the Petitioner, State Bar of Texas, would show as follows:

I.

Respondent denies each and every allegation in Petitioner's Motion for Contempt filed on September 15, 1992 and demands proof beyond a reasonable doubt on each of those complaints. Respondent invokes the doctrine of unclean hands against Petitioner.

II.

The State Bar of Texas, Counter-Defendant, is a public corporation and may be served with legal process by serving James N. McCormack, General Counsel, State Bar of Texas, Capitol Station, Austin, Texas, 78711, telephone number (512) 463-1381.

Respondent and Counter-Plaintiff (hereinafter referred to as "RJW") files the following affirmative grounds of recovery against Petitioner and Counter-Defendant (hereinafter referred to as "SBT") as allowed under Section 81.014 of the Texas Government

Code.

III.

RJW will show that employees of SST have entered into a combination of two or more persons to accomplish an unlawful purpose or to accomplish some other purpose, not in itself unlawful, by unlawful means. These persons listed below have intentionally participated by overt acts in the furtherance of a conspiracy preconceived by common design or purpose and with resulting damage or injury to RJW.

IV.

RJW would show that the contempt allegations filed on September 15, 1992 by SST were part of an action for malicious prosecution, without probable cause, and for the purpose of vexing and harassment of RJW, and putting him to the expense of defending himself, disgracing him in his community, and injuring him generally in his person and property.

V.

RJW would show that the Show Cause Order and Motion for Contempt obtained by SST was an abuse of process done intentionally, willfully, and improperly by using lawfully issued process for the collateral purpose of damaging RJW in his person and property without lawful cause.

VI.

That SST's employee, Yvyan F. Ballis, as furtherance of the civil conspiracy complained of herein, has engaged in releasing confidential information of the SST to RJW's former wife and to

Keith Harrison and Kristina Blina (Dial) and has met with them and is carrying out their directives to harm and damage RJW so that he would never regain his law license, or be able to lease office space from the commercial office building in Burleson, Texas to other practicing attorneys who would be in direct competition for clients with the said Keith Harrison and Kristina Blina (Dial), whose office is only one hundred yards away from the commercial office building owned by RJW.

VII.

RJW has been greatly damaged by the intentional actions complained of above-said and is entitled to recover actual damages of \$10,000,000.00 for said intentional infliction of mental anguish. The actions of EBT were willful and malicious and RJW should recover \$10,000,000.00 in punitive or exemplary damages.

Wherefore, premises considered, Counter-Plaintiff RJW prays recovery of all actual and punitive damages alleged herein, plus \$10,000,000.00 for intentional infliction of mental anguish, plus \$10,000,000.00 for exemplary damages against the EBT, plus general and equitable relief to which he may be entitled to, plus costs of Court.

Respectfully submitted,

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ROBERT J. WILSON, Respondent, Pro Se



**CERTIFICATE OF SERVICE**

Hand-delivered on counsel for Petitioner on the 19th day  
of October, 1992.

  
ROBERT J. WILSON