

14-06508-16

CAUSE NO. _____

MICHAEL QUINN SULLIVAN,

§

IN THE DISTRICT COURT

PLAINTIFF,

VS.

DENTON COUNTY, TEXAS

TEXAS ETHICS COMMISSION, *by and through
its Executive Director, Natalia Luna Ashley,
in her official capacity,*

DEFENDANTS.

_____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

Plaintiff, Michael Quinn Sullivan ("Sullivan"), files this Original Petition against the Texas Ethics Commission (the "Commission") and as grounds therefore would show the court as follows:

I. DISCOVERY PLAN

1. Discovery I this case will be conducted under Level 2 pursuant to Texas Rule of Civil procedure 19.03.

II. PARTIES

2. Sullivan is an individual who resides in Denton County, Texas.

3. The Texas Ethics Commission is a state agency and can be served at 201 East 14th Street, 10th Floor, Austin, Texas 787014, by serving its Executive Director, Natalia Luna Ashley.

III. JURISDICTION AND VENUE

4. Jurisdiction and venue are proper pursuant to Texas Government Code § 571.133.

IV. TEX. R. CIV. P. 54

5. All conditions precedent have been performed or occurred.

V. FACTS

6. In March, 2012, two complaints against Plaintiff Sullivan were filed with the Commission. *See, Sworn Complaints Before the Texas Ethics Commission*, Docket Nos. SC-3120487 and SC-3120488 (filed March 22, 2012). The Commission heard the two complaints in formal hearing on June 24, 2014.

7. The Commission issued a Final Order on July 21, 2014.

VI. CAUSE OF ACTION

8. Sullivan files this de novo appeal of the Commission's July 21, 2014 Final Order pursuant to Tex. Gov't. Code § 571.133

PRAYER

Sullivan respectfully prays that the Court hear complaints de novo, reverse the Commission's final order in Complaints SC-3120487 and SC-3120488 and render judgment in favor of Sullivan and that Sullivan be afforded all other and further relief, at law or in equity, general or special, to which he may be entitled.

Respectfully submitted,

BEIRNE, MAYNARD & PARSONS, L.L.P.

/s/ Joseph M. Nixon

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