

CAUSE NO. 48,258

COPY

THE STATE OF TEXAS : IN THE DISTRICT COURT OF
VS. : FORT BEND COUNTY, TEXAS
JOEY SULA : 400TH JUDICIAL DISTRICT

MOTION TO DISMISS FOR VIOLATION OF DEFENDANT'S DUE PROCESS RIGHTS AND PROSECUTORIAL MISCONDUCT

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Joey Sula, Defendant, in the above styled and numbered cause and requests this Honorable Court to dismiss said cause for denial of Defendant's rights of due process under the Texas and United States Constitutions and in support thereof shows the Court as follows:

I.

Joey Sula stands charged by indictment with the offenses of theft and money laundering. These charges were instigated by Assistant District Attorney, Mike Elliott. A true copy of Fort Bend County Criminal Docket---Thursday, May 22, 2008 reflecting Mike Elliott as the Assistant District Attorney in charge of the case is attached as Exhibit 1 and incorporated by reference the same as if fully copied and set forth at length.

II.

Assistant District Attorney Mike Elliott has several personal and professional connections with the Complainant. Karen Pearson served as the Republican political consultant for Mike Elliott's wife, Annie Elliott, as candidate for office. Annie Elliott is currently the District Clerk of Fort Bend County, Texas. Mrs. Elliott was elected to her office in November, 2006, some three months before Mike Elliott began his campaign to

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collect the money Joey Sula owed Karen Pearson. Mike and Annie Elliott have a close personal relationship with Karen Pearson. After the election of Annie Elliott, the two couples, Karen Pearson with Joey Sula and the Elliotts socialized together. In fact, Joey Sula was asked by Karen Pearson to assist Annie Elliott in obtaining a bond to meet the requirements of her office shortly before she took the oath of office.

III.

On or about February 15, 3007, Mike Elliott contacted Joey Sula as Karen Pearson's civil attorney regarding the repayment of the money back to Karen Pearson. No agreement could be reached between the parties and the matter remained unresolved for several months.

IV.

On May 24, 2007, Mike Elliott acquired the services of several deputies from the Fort Bend County Sheriff's office and an investigator for the Fort Bend County District Attorney's office, Sean Costello and, traveling from Fort Bend County to Harris County, deprived Joey Sula of his freedom outside a night club named "Mo's Place". In the parking lot at Mo's Place, officers of Fort Bend County Sheriff's Department and Fort Bend County District Attorney's office took Joey Sula into custody at gun point by hand cuffing him and placing him in an automobile assigned to Fort Bend County District Attorney's office.

V.

At that time, while Joey Sula was restrained of his liberty in the parking lot located in Harris County, Texas for more than two hours, Fort Bend County District Attorney Investigator Sean Costello threatened Defendant with criminal prosecution if

the loan to Karen Pearson was not immediately repaid. At all times during this episode, Assistant District Attorney Mike Elliott presided over the entire episode by standing outside the automobile in clear view of Joey Sula.

VI.

The District Attorney's office was provided copies of emails from Karen Pearson to the Defendant wherein Ms. Pearson referred to the loans as loans. True and correct copies of emails wherein Karen Pearson consistently refers to the transactions between her and the Defendant as "loans" are attached as Exhibit 2 and incorporated by reference the same as if fully copied and set forth at length. When it became apparent that Mike Elliott would use the assets of Fort Bend County to harass Defendant with criminal process, Joey Sula retained an attorney to communicate with the District Attorney's office and to arrange for his appearance before the Fort Bend County Grand Jury. Through the efforts of Mike Elliott, Defendant was denied an opportunity to appear before them.

VII.

Mike Elliott was the lead prosecutor on the cases against Joey Sula. A true and correct copy of the FortBendCountyGov website dated January 24, 2008 reflecting Mike Elliott as "prosecutor" on Cause Number 48259 wherein Joey Sula is defendant is attached as Exhibit 3 and incorporated by reference the same as if fully copied and set forth at length. Although one indictment was dismissed, Mike Elliott remained as prosecutor on the instant case against Defendant.

VIII.

The Texas Code of Criminal Procedure, Article 2.01 states that it is the duty “ of all prosecuting attorneys not to convict, but to see that justice is done.” The Texas Disciplinary Rules of Professional Conduct proscribe the conduct of a District Attorney as a lawyer from presenting, participating or threatening to present criminal charges solely to gain an advantage in a civil matter. Rule 4.04, Texas Disciplinary Rules of Professional Conduct.

IX.

The duty to avoid a conflict of interest has long been imposed on the prosecutors of the State; see *State Ex Rel. Sherrod v. Carey* 790 SW2d 705 (Tex.App.Amarillo.1990); *State v. May* 270 SW2d 682 (Tex. Civ.App. 1954); *Worthington v. State* 714 SW2d 461 (Tex.App.Houston Jst Dist., 1996). The clear implication of and *Worthington* is that Article 2.01 must be constructed broadly enough to protect a defendant from conflicts of interest involving not only the elected district attorney himself but also members of his staff. The district attorney and his entire office, under appropriate circumstances, may be disqualified from participation in a particular case on constitutional grounds as well as under Disciplinary Rules of Professional Conduct. The Trial Court has a duty to protect a defendant’s rights to due process of law under both the Texas and the United States Constitutions, see *Ex Rel. Sherrod v. Carey supra*. Certainly, a prosecutor’s violation of ethical rules will subject a case to reversal when his unprofessional conduct results in a denial of due process to a Defendant. “Removing a district attorney’s office from a particular case however, is clearly distinct from an attempt to remove an official from his or her elected office.” Courts also have taken strong views on the “appearance of impropriety to the general public. In *State v. Ex Rel. Eidson v. Edwards*, 793 SW2d 1

(*Tex.Crim.App.1990*) and *Re Corrugated Container Antitrust Litigation*, 659 F2d 1341 (5th Cir, 1981), both cases dealt with the appearance of impropriety.

X.

Lawyers owe a duty of scrupulous honesty, forthrightness and the highest degree of ethical conduct and inherent in these duties is compliance with both the spirit and the express terms of established rules of conduct and procedure; see *J.B.K.*, 931 SW2d 581 (*Tex.App.El Paso 1996*). The cannons do not depend upon which side of the bar the lawyers sits, prosecutors are not immune from the cannons of professional conduct; *State v. Ex Rel. Eidson v. Edwards*, 793 SW2d 1 (*Tex.Crim.App.1990*). A Trial Court can only disqualify a district attorney or his staff on the basis of a conflict of interest if the conflict rises to the level of a due process violation, see *State Ex Rd. Hill v. Pirtle*, 887 SW2d 921 (*Tex. Crim.App.*). In fact, a district judge must comply with the Code of Judicial Conduct which requires that he take or initiate appropriate disciplinary measures against a lawyer for unprofessional conduct of which judges become aware, see *State Ex Rel. Hill supra*. Rule 4.04, specifically applies to the prosecutor who participates in a criminal action when the result is to gain advantage in a civil matter, see *State Er Rel. Hill supra*. In *Young v. US Ex Rel Vuitton Et. Filssa*, 481 US 787 107 S.Ct. 2124, 952.ed. 740 (1987), the Supreme Court held, “we may require a stronger showing for a prosecutor than a judge in order to conclude that a conflict of interest exists. Once we have drawn that conclusion, however, we have deemed the prosecutor subject to influences that undermine confidence that a prosecution can be conducted in a disinterested fashion. If this is the case, we cannot have confidence in a proceeding in which these offices plays the critical role of “preparing and presenting” the case for the defendant’s guilt,” *id.* 481

US at 804-811, 107 S.Ct. at 2136-2138, see also Ethics Opinion 332 (August 1967).

Conflicting Interests — Public Prosecutor Representing Civil Suitors: it is improper for a public prosecutor to represent any party in a civil matter arising out of an occurrence which also is the subject of a criminal “investigation” or prosecution, within the jurisdiction of such public prosecutor. Rule 4.04(b) Texas Disciplinary Rules of Professional Conduct and accompanying comment to the rule expresses concerns about using the criminal process to coerce a party in a private matter which improperly suggests that the criminal process can be manipulated; see *State Ex Rel. Hill v. Firtle supra*.

XI.

Although John Healey, elected District Attorney of Fort Bend County, Texas has removed Mike Elliott as the lead attorney in this case, the taint of his prosecutorial misconduct and his conflict of interest colors the ability, impartiality and fairness for the District Attorney’s Office of Fort Bend County to question and investigate a fellow member with his rank in the office. Mike Elliott’s abuse of the power of the District Attorney’s office as well as his retention of the Fort Bend County Sheriff’s office in the unlawful detention of the Defendant--in another county and without jurisdiction to so act-- have violated the due process rights of Joey Sula under the Texas And United States Constitutions.

XII.

Mike Elliott’s conflicts of interest and his personal, political and monetary interests have tainted the fairness and impartiality of this proceeding. The commingling of criminal and civil investigations effectively denies the Defendant a right to a fair and adversarial proceeding. By oppressing the Joey Sula’s opportunity to appear before the

Grand Jury, Mike Elliott gained partisan advantage for his political ally. Such abuse of power coupled with tainted investigations and grand jury process suppression have fundamentally denied Defendant, Joey Sula his rights under the due process clause of the Texas and the United States Constitution.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully prays that this Honorable Court will conduct a hearing and then dismiss with prejudice the said cause of action.

Respectfully submitted,



LARRY A. VICK
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Houston, Texas 77042
(713) 333-6440
(713) 236-1342 Facsimile

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Motion was hand delivered to the Fort Bend County District Attorney's Office, on August 29th, 2008.



LARRY A. VICK

ORDER

The foregoing Motion To Dismiss for Violation of Defendant's Due Process Rights and Prosecutorial Misconduct having been presented to the Court, the request for hearing is hereby (GRANTED in all things and a hearing is hereby ordered to be held prior to the commencement of the trial on the _____ day of _____, 2008, at _____ o'clock __.M.) (DENIED, to which action of the Court the Defendant duly excepts).

JUDGE PRESIDING



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District Court Number 400 of Fort Bend County

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Select the table HEADING below for SORT ORDER



| | | | |
|-------|-------------------------|---|--------------------------|
| 10:15 | 032904 | THOMAS, TONY DUANE | STRIMPLE, SHELLY |
| | MRP DOCKET | DWI V /F3 | HECKER, DON |
| 10:15 | 036503 | JOHNS, BENJAMIN JACOB | MCALISTER, JIM |
| | MRP DOCKET | POSSESSION OF A CONTROLLED SUBSTANCE/F-2 | HECKER, DON |
| 10:15 | 037595 | IRBY, JEREMY DONAVAN | SHAH, ANU |
| | PLEA DISPOSITION DOCKET | DRIVING WHILE INTOXICATED/F-3 | ROLL, ROXIE |
| 10:15 | 038420 | ALEJOS, MARCO ANTONIO JR. | DELOZIER, CHRIS |
| | MRP DOCKET | BURGLARY OF HABITATION / FELONY-2 | DAVIS, ERIC |
| 10:15 | 038640 | IRBY, JEREMY DONAVAN | SHAH, ANU |
| | PLEA DISPOSITION DOCKET | DRIVING WHILE INTOXICATED/FELONY-3 | ROLL, ROXIE |
| 10:15 | 041680 | REUSS, SAMUEL STEFAN | ELLIOTT, MIKE |
| | PLEA DISPOSITION DOCKET | BURGLARY OF BUILDING/FS | MIDDLETON, BRIAN |
| 10:15 | 042074 | AMARO, JAIME ANTONIO | HARTMAN, MIKE |
| | PLEA DISPOSITION DOCKET | CREDIT CARD OR DEBIT CARD ABUSE/FS | IHEZUKWU, VICTOR CHINEDU |
| 10:15 | 044234 | STERN, JOHN DAVID | ELLIOTT, MIKE |
| | PLEA DISPOSITION DOCKET | THEFT PROP>=\$1,500<\$20K/FS | ADAMS, GLENDON B |
| 10:15 | 045005 | BLACKMON, DORCUS LAUNENA | HANNA, MARK |
| | MRP DOCKET | POSS CS PG 1>=4G<200G/F2 | BECERRA, CHRISTIAN |
| 10:15 | 045769 | STEWART, CALLUM | HANNA, MARK |
| | PRE-TRIAL MOTION DOCKET | MAN DEL CS PG 1>=4G<200G/F1 | SCHAFFER, KENT A |
| 10:15 | 046052 | BOLIVAR, JAVIER HERNANDO | ELLIOTT, MIKE |
| | PLEA DISPOSITION DOCKET | CT-I, CT-II FORGERY FINANCIAL INSTRUMENT/FS | |
| 10:15 | 046071 | BOLIVAR, JAVIER HERNANDO | ELLIOTT, MIKE |
| | PLEA DISPOSITION DOCKET | FORGERY FINANCIAL INSTRUMENT/FS | |
| 10:15 | 046073 | FLETCHER, LAMANUEL JAMES | HARTMAN, MICHAEL |
| | PLEA DISPOSITION DOCKET | ROBBERY/F2 | ASHFORD, ERIC |
| 10:15 | 046142 | HERRON, TROY ALLEN | HARTMAN, MICHAEL |
| | MRP DOCKET | THEFT PROP >=\$1,500 <\$20K/FS | HECKER, DON |
| 10:15 | 046754A | ACKER, JASON EUGENE | DELOZIER, CHRIS |
| | PLEA DISPOSITION DOCKET | AGG ASSAULT W/DEADLY WEAPON/F2 | |
| 10:15 | 047138 | FLETCHER, LOUISE MARIA | DELOZIER, CHRIS |
| | PLEA DISPOSITION DOCKET | ASSAULT PUBLIC SERVANT / F3 | GONZALEZ, RALPH L |
| 10:15 | 047298 | GARZA, BENITO SANMIGUEL | DELOZIER, CHRIS |
| | PLEA DISPOSITION DOCKET | AGG ASSAULT W/ DEADLY WEAPON / F2 | GONZALEZ, RALPH L |
| 10:15 | 047362 | PAZ, CARLOS | DELOZIER, CHRIS |
| | PLEA DISPOSITION DOCKET | DRIVING WHILE INTOXICATED 3RD OR MORE / F3 | CROWLEY, J. SIDNEY |
| 10:15 | 047470 | BAILEY, REGINALD GLEN | ELLIOTT, MIKE |
| | PLEA DISPOSITION DOCKET | ARSON / F2 | HUGHES, CRAIG |
| 10:15 | 047486 | DAVIS, JOSOLYN HUNTER | ELLIOTT, MIKE |
| | PLEA DISPOSITION DOCKET | CT-I THEFT PROP CT-II MONEY LAUNDERING >=\$1,500 <\$20K/ FS | |
| 10:15 | 047553 | PINES, JERRY JAMES | HARTMAN, MICHAEL |
| | PLEA DISPOSITION DOCKET | CONSPIRACY TO COMMIT AGGRAVATED ROBBERY / F2 | HUNTER, DAVID S. |
| 10:15 | 047610 | GOLDSMITH, ROBERT CHRISTOPHE | HARTMAN, MICHAEL |
| | PLEA DISPOSITION DOCKET | FRAUD USE POSS OF IDENTIFYING INFO / FS | COTLA |



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| 10:15 | 047621 PLEA DISPOSITION DOCKET | DAVIS, JOSOLYN HUNTER CT-I THEFT PROP>=\$1,500<\$20K CT-II MONEY LAUNDERING / FS | ELLIOTT, MIKE |
| 10:15 | 047738 PLEA DISPOSITION DOCKET | GONZALES, LOUIS JESSE POSS CS PG 1 >=4G<200G / F2 | WITTIG, WES BECERRA, CHRISTIAN |
| 10:15 | 047794 PLEA DISPOSITION DOCKET | PARKER, MONICA DENISE CT. I MISAPP FIDUC/FINAN PROP>=\$1,500<\$20K CT. II MONEY LAUNDERING | ELLIOTT, MIKE FALLON, JAMES |
| 10:15 | 047822 PLEA DISPOSITION DOCKET | GUTIERREZ, MIGUEL ANGEL BURGLARY OF HABITATION / F2 | DELOZIER, CHRIS ADAMS, DIANA |
| 10:15 | 047823 PLEA DISPOSITION DOCKET | LOPEZ, ARIEL NOEL BURGLARY OF HABITATION / F2 | DELOZIER, CHRIS ADAMS, GLENDON B |
| 10:15 | 047850 PLEA DISPOSITION DOCKET | VALDEZ, LAURA MARGARET THEFT PROP >=\$1,500<\$20K / FS | DELOZIER, CHRIS MIDDLETON, BRIAN |
| 10:15 | 047882 PLEA DISPOSITION DOCKET | LEONARD, DOMINIQUE PIERRE ROBBERY / F2 | DELOZIER, CHRIS DOUGLAS, LARRY B |
| 10:15 | 047958 PLEA DISPOSITION DOCKET | COLUMBUS, CHRISTOPHER ANDREW INDECENCY W/CHILD SEXUAL CONTACT/F2 | GUERRA, LISA |
| 10:15 | 047966 PLEA DISPOSITION DOCKET | GARCIA, ANASTACIA OCHOA DRIVING WHILE INTOXICATED 3RD OR MORE/F3 | DELOZIER, CHRIS BANKSTON, DONALD W |
| 10:15 | 048002 PLEA DISPOSITION DOCKET | GRADONI, ANTHONY JAMES BURGLARY OF HABITATION/F2 | HARTMAN, MICHAEL BELL, RICHARD T |
| 10:15 | 048034 PLEA DISPOSITION DOCKET | YORK, LISA CT. I-II TAMPER W/GOVERN RECORD DEFRAUD/HARM/FS | DELOZIER, CHRIS BATCHAN, JOHN W. |
| 10:15 | 048078 PLEA DISPOSITION DOCKET | VALDEZ, ALBERTO AGG ASSAULT CAUSE SERIOUS BODILY INJ / F2 | HARTMAN, MICHAEL DIAZ, MICHAEL |
| 10:15 | 048102A PLEA DISPOSITION DOCKET | CARRANZA, JOE ALBERT JR AGG ROBBERY/F1 | HARTMAN, MICHAEL BANKSTON, DONALD W |
| 10:15 | 048103A PLEA DISPOSITION DOCKET | CARRANZA, JOE ALBERT JR AGG ROBBERY/F1 | HARTMAN, MICHAEL BANKSTON, DONALD W |
| 10:15 | 048104A PLEA DISPOSITION DOCKET | CARRANZA, JOE ALBERT JR AGG ROBBERY/F1 | HARTMAN, MICHAEL BANKSTON, DONALD W |
| 10:15 | 048168 PLEA DISPOSITION DOCKET | VERNON, SIMONE THEFT PROP >=\$1,500 <\$20K/FS | HARTMAN, MICHAEL CAGGINS, DON R. |
| 10:15 | 048178 PLEA DISPOSITION DOCKET | MILLS, CORNELIUS ROBBERY/F2 | DELOZIER, CHRIS BANKSTON, DONALD W |
| 10:15 | 048236 PLEA DISPOSITION DOCKET | DAVIS, CORDELL LADON CT I - UNAUTH USE OF VEHICLE CT II - THEFT / FS | HARTMAN, MICHAEL LUDWIG, CHRIS |
| 10:15 | 048258 PLEA DISPOSITION DOCKET | SULA, JOEY CT. I-II THEFT PROP.=\$200K / F1 | ELLIOTT, MIKE |
| 10:15 | 048278 PLEA DISPOSITION DOCKET | MUNOZ, SIXTO AGG ASSAULT W/DEADLY WEAPON / F2 | DELOZIER, CHRIS DECLINED, ATTORNEY |
| 10:15 | 048282 PLEA DISPOSITION DOCKET | DELIRA, JESUS EVADING ARREST DETENTION W/VEH / FS | HARTMAN, MICHAEL ROLL, ROXIE |
| 10:15 | 048291 PLEA DISPOSITION DOCKET | SEALS, ELVIN JEROME CREDIT CARD OR DEBIT CARD ABUSE/FS | HARTMAN, MICHAEL ROLL, ROXIE |
| 10:15 | 048326 PLEA DISPOSITION DOCKET | KENNARD, PRINDLE DEAN JR. BURGLARY OF HABITATION / F2 | DELOZIER, CHRIS DECLINED, ATTORNEY |
| 10:15 | 048327 PLEA DISPOSITION DOCKET | TINGLE, LADARIUS JERMAINE BURGLARY OF HABITATION / F2 | DELOZIER, CHRIS HALL, KEVIN |
| 10:15 | 048337 PLEA DISPOSITION DOCKET | MISSOURI, STACY LYNN POSS CS PG 1 <1G / FS | WITTIG, WES PERZ, IRA |
| 10:15 | 048346 PLEA DISPOSITION DOCKET | NUNEZ, ADRIAN NICHOLAS EVADING ARREST DETENTION W/VEH / FS | BRIDGES, CHAD ADAMS, DIANA |
| 10:15 | 048347 PLEA DISPOSITION DOCKET | NUNEZ, ADRIAN NICHOLAS AGG ASSAULT W/DEADLY WEAPON D.V. / F2 | BRIDGES, CHAD ADAMS, DIANA |
| 10:15 | 048358 | MOORE, JAMES JR. | HARTMAN, MICHAEL |

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| | PLEA DISPOSITION DOCKET | BURGLARY OF HABITATION/F2 | ADAMS, DIANA |
| 10:15 | 048359 PLEA DISPOSITION DOCKET | WHITE, NORRIS HAMILTON BURGLARY OF HABITATION/F2 | HARTMAN, MICHAEL AKPAFFIONG, BASSEY |
| 10:15 | 048378 PLEA DISPOSITION DOCKET | FARR, DEWIE JR DRIVING WHILE INTOXICATED 3RD OR MORE/F3 | HARTMAN, MICHAEL CORTES, EDUARDO |
| 10:15 | 048384 PLEA DISPOSITION DOCKET | MISSOURI, STACY LYNN AGG ROBBERY/F1 | PERZ, IRA |
| 10:15 | 048391 PLEA DISPOSITION DOCKET | TINGLE, LADARIUS JERMAINE UNL POSS FIREARM BY FELON/F3 | DELOZIER, CHRIS HALL, KEVIN |
| 10:15 | 048430 PLEA DISPOSITION DOCKET | UGWU, CHICHI EMMANUEL INJURY CHILD/ELDERLY/DISABLE W/INT BODILY INJ/F3 | HARTMAN, MICHAEL BARR, BEVERLY |
| 10:15 | 048442 PLEA DISPOSITION DOCKET | TRAN, LY CONG AGG ASSAULT W/DEADLY WEAPON / F2 | HARTMAN, MICHAEL DIAZ, MICHAEL |
| 10:15 | 048443 PLEA DISPOSITION DOCKET | TRAN, LY CONG AGG ASSAULT W/DEADLY WEAPON / F2 | HARTMAN, MICHAEL DIAZ, MICHAEL |
| 10:15 | 048462 PLEA DISPOSITION DOCKET | TREVINO, MARTIN EVADING ARREST DETENTION W/VEH/FS | HARTMAN, MICHAEL DIAZ, MICHAEL |
| 10:15 | 048474 PLEA DISPOSITION DOCKET | LUQUE, DAVID THEFT PROP <\$1,500 2/MORE PREV CONVIC/FS | HARTMAN, MICHAEL JONES, TONI |
| 10:15 | 048486 PLEA DISPOSITION DOCKET | WILLINGHAM, WILLIAM RYAN POSS CS PG 3>=28G<200G/F3 | WITTIG, WES ROLL, ROXIE |
| 10:15 | 048498 PLEA DISPOSITION DOCKET | WARD, JOE BOB JR. DRIVING WHILE INTOXICATED 3RD OR MORE/F3 | DELOZIER, CHRIS COTLAR, DORIAN C |
| 10:15 | 048562 PLEA DISPOSITION DOCKET | DELGADO, ANTHONY DRIVING WHILE INTOXICATED 3RD OR MORE / F3 | HARTMAN, MICHAEL FOSTER, LOGENE L |
| 10:15 | 048634 PLEA DISPOSITION DOCKET | LEISTIKOW, CARL COLE BURGLARY OF BUILDING / FS | DELOZIER, CHRIS ADAMS, GLENDON B |
| 10:15 | 048646 PLEA DISPOSITION DOCKET | THOMAS, DANIEL DEON MAN DEL CS PG 1 >=1G DRUG FREE ZONE / F* | WITTIG, WES FRANKLIN-WILLIAMS, RAMONA |
| 10:15 | 048698 PLEA DISPOSITION DOCKET | FLORES, MARCOS AGG ROBBERY/F1 | HARTMAN, MICHAEL GONZALEZ, RALPH L |
| 10:15 | 048798 PLEA DISPOSITION DOCKET | JONES, MYKUL OLANDES POSS CS PG 1>=4G<200G/F2 | WITTIG, WES JONES, WILLIAM E. |
| 10:15 | 048814 PLEA DISPOSITION DOCKET | DEAN, SUSAN J. THEFT PROP >=\$1,500<\$20K/ FS | HARTMAN, MICHAEL EPO, JAMES F |
| 10:15 | 048818 PLEA DISPOSITION DOCKET | SOTO, SEVERO III BURGLARY OF HABITATION/ F2 | DELOZIER, CHRIS DIAZ, MICHAEL |
| 10:15 | 048838 PLEA DISPOSITION DOCKET | GARCIA, JIMMIE III AGG ASSAULT CAUSES SERIOUS BODILY INJ/ F2 | DELOZIER, CHRIS |
| 10:15 | 048858 PLEA DISPOSITION DOCKET | RIOS, JUAN MANUEL ACCIDENT INVOLVING INJ/DEATH/ F* | DELOZIER, CHRIS ADROGUE, MATIAS JOSE |
| 10:15 | 048862 PLEA DISPOSITION DOCKET | BROWN, BRUCE ELLIOTT FORGERY FINANCIAL INSTRUMENT/ FS | DELOZIER, CHRIS DECLINED, ATTORNEY |
| 10:15 | 048866 PLEA DISPOSITION DOCKET | GUIDRY, JUSTEN BLAKE BURGLARY OF HABITATION/ F2 | HARTMAN, MICHAEL DECLINED, ATTORNEY |
| 10:15 | 048878 PLEA DISPOSITION DOCKET | MCCULLOUGH, TERANCE EUGENE TAMPER FABRICATE PHYSICAL EVID W/INTENT TO IMPAIR/ F3 | DELOZIER, CHRIS |
| 10:15 | 048918 PLEA DISPOSITION DOCKET | WILLIAMS, DEMECHE DONTAE AGG ASSAULT W/ DEADLY WEAPON/ F2 | HARTMAN, MICHAEL |
| 10:15 | 048934 PLEA DISPOSITION DOCKET | VELA, NOE ADRIAN CRIMINAL MISCHIEF >=\$1,500<\$20K/ FS | HARTMAN, MICHAEL COTLAR, DORIAN C |
| 10:15 | 048962 PLEA DISPOSITION DOCKET | BROWN, CHRISTOPHER LEE BURGLARY OF HABITATION/F2 | DELOZIER, CHRIS BRYANT, KENNETH W |
| 10:15 | 048963 PLEA DISPOSITION DOCKET | CUMMINGS, JASON LEE BURGLARY OF HABITATION/F2 | DELOZIER, CHRIS BOOKER, KEYSHA L. |

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| | DOCKET | | |
| 10:15 | 048972 PLEA DISPOSITION DOCKET | HURTADO, FERNANDO TANGARIFE BURGLARY OF HABITATION/F2 | HARTMAN, MICHAEL CORTES, EDUARDO |
| 10:15 | 048987 PLEA DISPOSITION DOCKET | MORENO, PEDRO CORONA POSS CS PG 1<1G/FS | WITTIG, WES FADEN, CARY M |
| 10:15 | 049002 PLEA DISPOSITION DOCKET | WHITE, PERRY JAMAH THEFT PROP <\$1,500 2/MORE PREV CONVIC/FS | DELOZIER, CHRIS |
| 10:15 | 049010 PLEA DISPOSITION DOCKET | PADILLA, SHARON DENISE ASSAULT PUBLIC SERVANT/ F3 | DELOZIER, CHRIS GAITHER, R TRENT |
| 10:15 | 049018 PLEA DISPOSITION DOCKET | ST. HILAIRE, KEENEN LEXSEN POSS MARIJ >4OZ<=5LBS/ FS | WITTIG, WES SALMON, LOUIS VAL |
| 10:15 | 049019 PLEA DISPOSITION DOCKET | WILLIAMS, DEMECHE DONTAE POSS MARIJ >4OZ<=5LBS/ FS | WITTIG, WES |
| 10:15 | 049029 PLEA DISPOSITION DOCKET | RANGEL, RICK SEX OFFENDERS DUTY TO REGISTER LIFE/ANNUALLY/ F3 | GUERRA, LISA COTLAR, DORIAN C |
| 10:15 | 049070 PLEA DISPOSITION DOCKET | MASON, ALEXIS MARIE INJURY CHILD/ ELDERLY/ DISABLE W/ INT BODILY INJ/ F3 | DELOZIER, CHRIS ASHFORD, ERIC |
| 10:15 | 049078 PLEA DISPOSITION DOCKET | LEOPOLDO, ALAN CAMARA CRIMINAL NEGLIGENT HOMICIDE / FS | HARTMAN, MICHAEL |
| 10:15 | 049086 PLEA DISPOSITION DOCKET | BENAVIDES, J SOCORRO INTOXICATED MANSLAUGHTER W/VEHICLE/F2 | HARTMAN, MICHAEL |
| 10:15 | 049098 PLEA DISPOSITION DOCKET | VIOLA, HEATHER ROSS BURGLARY OF HABITATION/F2 | DELOZIER, CHRIS COTLAR, DORIAN C |
| 10:15 | 049122 PLEA DISPOSITION DOCKET | PITTMAN, JYQUINN DURRELL ASSAULT PUBLIC SERVANT/ F3 | DELOZIER, CHRIS ADAMS, GLENDON B |
| 10:15 | 049123 PLEA DISPOSITION DOCKET | PITTMAN, JYQUINN DURRELL ASSAULT PUBLIC SERVANT/ F3 | DELOZIER, CHRIS ADAMS, GLENDON B |
| 10:15 | 049210 PRE-TRIAL MOTION DOCKET | HARRIS, WALTER LUDELL EVADING ARREST DETENTION W/VEH/FS | DELOZIER, CHRIS ASHFORD, ERIC |
| 10:15 | 049210 PLEA DISPOSITION DOCKET | HARRIS, WALTER LUDELL EVADING ARREST DETENTION W/VEH/FS | DELOZIER, CHRIS ASHFORD, ERIC |

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 301 Jackson Street - Richmond, TX 77469
 281-342-3411



Home > Care & Concern > Featured Picks

COULD YOUR DEPRESSION REALLY BE PART OF BIPOLAR DISORDER?

FIND OUT MORE BY TAKING THIS QUICK QUESTIONNAIRE

Joey,

Will you please tell me why you want to make this so hard in getting me my money that I loan you?

As you know that I am very willing person to help you out. I am just having a problem that you will not tell me when you are going to take care of this. You have sent me note telling the wire for the paper is do?? I have not seen it.. You tell me you are going to pay the intrest which by the way is past due for Dec. and Jan. now. (by the way I don't have the money to pay for this) I see no sign of you trying to take care of all of this at all. I am the one on the line and you gave me your word you would not put me in the boat at all. You are runing my credibility. As I have told you before I did this I wanted the loan on my house paid in full plus all the taxes paid. (Taxes are due before the end of this month I don't want to be late on getting them paid.) Plus I need money to live on. You Even knew this two weeks ago and told me I bring some money buy for you. Still you have not? I am not quite sure how you think I am to live with no cash. Every place I had some put back. You took it to use for your bill or to take care of your mom..No, I did not have a problem with that part of taken care of your mom and you needed help.. I total understand the care taken part. This is when I really trust you would give it back to me.

But it would seem to me if you Owed this kind of money to someone you care for at all. You would make some time with then to work without yelling or crusing at me and talk about this issue.





Member Services



Monday, Jan 15

E-mail | Address Book | Calendar

AAA

E-mail Options | E-mail Help

Mailbox Usage

1% of 25 MB



Google WEB SEARCH

White Pages Yellow Pages Maps

INBOX



Logged in as: prostocktrader [Logout]
Message: 3 of 3 < Previous | Next >

MAILBOX pro...der

- INBOX [2]
- Draft
- Screened Mail
- SentMail
- Trash empty

MY FOLDERS add

- Folder Manager
- Mailbox Manager
- Address Book
- Calendar

CURRENT SETTINGS

- Spam Blocker
- Virus Protection
- More E-mail Options

From: karenvpearson@aol.com [Save Address](#) [Reminder](#)
 To: "Joey Sula" <prostocktrader@att.net>
 Cc: "Joey Sula" <prostocktrader@att.net>
 Date: Mon, 15 Jan 2007 03:26:04 +0000 [\[View Source\]](#)

Joey,

Why are you doing this????

There no reason in the world to make things so hard and ugly.

I was the good friend to loan you the money when no one else was there to help you these were your words.

All I been trying to do is get my money back I loan you. After doing some checking I see you have not told me the truth. About some of your problem????

I don't care what any of your issue are. I was the person being taken advantage of. You have used me and you know it
Thank goodness I was smart to stop it before you got anymore from me

Bottom line I help you out and loan you the money in good faith with your word. I have it wire to me by dec 15 as of today nothing.

You are putting me in a hell of a deal

This I do not deserve at all.

I would like to know when I can expect my money from you??

Karen

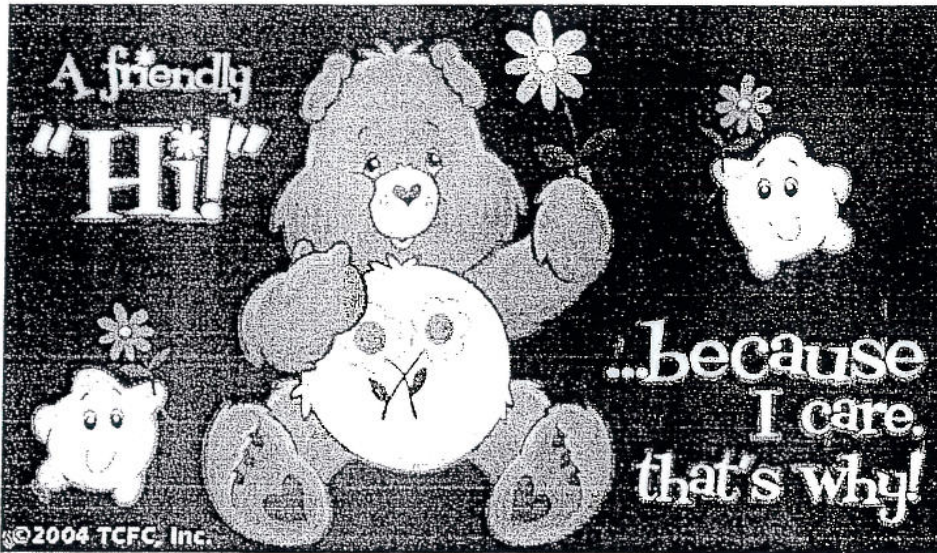
Sent from my Verizon Wireless BlackBerry

Message: 3 of 3 < Previous | Next >

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Home > Just Because > Say "Hi"



Joey,

Please call me. I can not take bill collector calling me. I just don't live this way at all. Never in my life has anyone called me about a late payment on any bill.

Now they want Dec. and Jan. and Febuary payments. I don't have it at all.

As you know first hand I can not take the stress level you are putting me under. You may be custom to living like this but I am not. This stress is causing me all kind of health problems. The doctor inform me today it's because of the stress.

Why are you doing this to me??

I was in CS today when I called to come by to see you and pass out and had to be taken home. They ran some test this afternoon and it's because of stress and high blood pressure. The doctor inform me that what ever I am so upset about I need to put a stop to it. This this the third time in a two week peiod I have been taken to the hospital or at the drs. because of the stress.

Please I am begging for you to please do something on this issue.

It's very sad that I beleive in you at your word and you do this to me.

No one should have to deal with this when they loan a "Friend" money.

This is worst than going thur my divorce.

- grocery coupons
- free samples
- baby coupons
- online coupons
- travel coupons
- beauty coupons
- store coupons
- free stuff



Home > Care & Concern > Smiles



COULD YOUR DEPRESSION REALLY BE PART OF BIPOLAR DISORDER? FIND OUT MORE BY TAKING THIS QUICK QUESTIONNAIRE

Joey,

You have owed me money every since July 2006. The sad part to me on all of this you told me you would never not take care of your responsible and here you are not taken care of it. You are not even trying at all.

I am asking you to please get in contact with me and let me know when are you going to get me some money or all the money you owe.

I need to know what is you intention of taken care of this matter?

Please not only are you costing me money but it's affecting my health also.

I am not asking for anything but my money you owe me.

You know what you have done to me is not right....

I do not deserve this at all.

Trust is a big issue with me. Why are you doing this???

Please and I am asking please get this taken care of. Please



Home > Friendship > Smiles

Joey,

As A FRIEND always helping my FRIEND out even after you have done this to me. There is some information that I have that will help YOU, Yes I mean YOU!

This has nothing to do with the money you owe me at all! I promise you that!!

Once you hear what I have to tell you I am sure you will be very thankful....


Yes, everyone has a hard time during the life but when someone is trying to work with you or even help you out. You could least give some respect to call them back or give them some kind of answer in a timely manner. No, you are not that busy!! You and I both know that....

If I don't hear from you. I will assume you don't need the information. But I will at least know that I try to get it to you.

You decide if you want to know the information?

Just remember one thing that you will never and I mean never have a friend as good as I was to you.

I am truly sorry you have taken it to this level....It was not



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necessary to. Just remember one thing communication always goes a long way. VS not communication which this is what you been doing. As someone would say you get more with honey than vinegar....

Remember this has nothing to do with the money you owe me.....




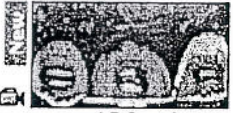


Once again you decide if you want to know the information.

Take Care!

Karen Vannerson-Pearson

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Send a Reply E-Card

| | | |
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|  New! Spread the Love! |  New! Cupid Shooting Gallery |  New! Friends and Fate |
|  New! ABCs of Valentine's Day |  New! Valentine's Day Bites |  New! You're My Everything |

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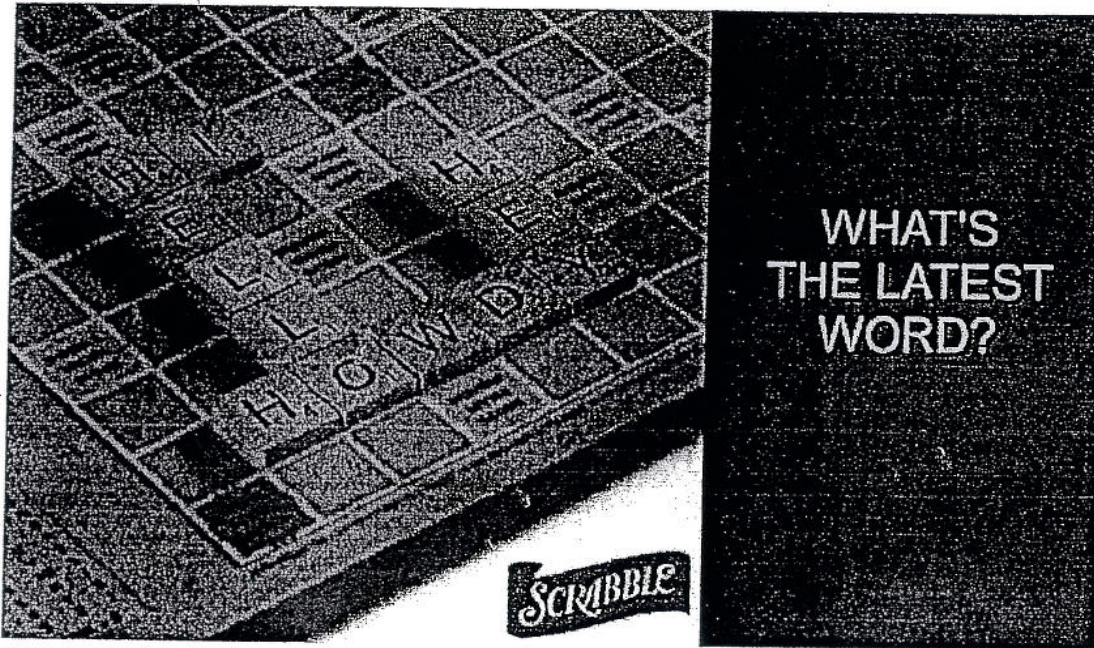
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Home > Just Because > Say "Hi"



Joey,

What the deal on the money I loan you??

I need to know something now.

Karen

Go to AOL Greetings

Send a Reply E-Card



Spread the Love!



Cupid Shooting Gallery



Friends and Fate



ABCs of Valentine's Day



Valentine's Day Bites



You're My Everything



Home > Just Because > Say "Hi"



Joey,

Guess you will be missing the rodeo this year? All you need to do is just take care of your business on the money that I loan you. Plus all the intrest also.

That is really to bad.

You have to miss out on a great deal!!!

I hate that you are making this so hard to get my money that I loan you in good faith. I should not have to be doing this to get it back. You told me it would not be this way???

Why are you doing this??

You have not even try to work something out. I have called email text almost each or ever other day and get no reply from you....

Joey you know this is not right....Come on and get this taken care of please.....

Where the intrest you were going to pay on this money and not get behind on it either??



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DEFENDANT'S CASE INFO

District Clerk

Menu

Cause Number: 48259 Suffix:

Disposition Information

Reset Cause Number

Alias

Defendant: SULA, JOEY
Address:

Offense: CT. I-II MONEY LAUNDERING
>=\$200K / F1
Offense Date: 12 10 07

Payments

Texas Driver License: ----9308
Date of Birth: 04 -- 65

Arrested By:
Date Arrested:

Docket Settings

Bond Reduce/Increase

Associate Judge: 0
Date Assigned:

Bench Warrant:

Bond Forfeit

Re-indictment: N

Defense Attorney:
Date Appointed:

Surety to Surrender

Name Change:

Prosecutor: MIKE ELLIOTT

Motion to Revoke Probation

District Attorney Case Number:
7337041

Co-Defendants? N

Writs

Current Case Type: FILED BY
INDICTMENT
Date Filed: 12 10 07

Bondsman:
Bond Amount:

Appeals

Original Case Type: FILED BY
INDICTMENT
Date Filed: 12 10 07
Original Court: 400

Hung Jury:
Mistrial:
Comments: 211.00

Capias

Browse Defendants

Transfer Court:
Date Transferred:

Competency Hearing Date:
Comments:

Exit

Jury Examination Date:
Jury Sworn Date:

Last Change Date: 12/13/07,15:40

LISTING REQUESTED RECORD

Contact Webmaster - Webmaster
Fort Bend County - FortBendCountyGov.com
301 Jackson Street - Richmond, TX 77469
281-342-3411

