

NO. **26-DCV-341122**

GEORGE J. WAKILEH,	§	IN THE DISTRICT COURT OF
<i>Plaintiff,</i>	§	
v.	§	
GRAND LAKES MUNICIPAL UTILITY DISTRICT # 2,	§	
REPRESENTED BY	§	
MICHAEL CHRISTOPHER MCCLUSKY,	§	
J. SCOT VANN,	§	FORT BEND COUNTY, TEXAS
GREGORY JAY HENRY,	§	
BRADLEY ALLEN BAKER,	§	
WILLIAM DONALD BUTLER,	§	Fort Bend County - 502nd Judicial District Court
IN THEIR OFFICIAL CAPACITY AS	§	
BOARD OF DIRECTOR OFFICERS,	§	
<i>Defendant.</i>	§ JUDICIAL DISTRICT

**ORIGINAL PETITION
AND APPLICATION FOR INJUNCTIVE RELIEF**

CONTENTS

- I. THE ACTION
- II. PARTIES AND SERVICE OF PROCESS
- III. DISCOVERY CONTROL PLAN
- IV. JURISDICTION AND VENUE
 - A. The Parties' Whereabouts
 - B. The Court's Jurisdiction
- V. BACKGROUND
 - A. The MUD's Structure
 - B. Factual and Legal Bases
- VI. ACTS SOUGHT TO BE ENFORCED
- VII. APPLICANT'S BOND
- VIII. PRAYER

- Exhibit 1: Tax Collection Agreement between Grand Lakes MUD # 2 and a delinquent tax attorney.
- Exhibit 2: April 21, 2025 Resolution Authorizing Additional Penalty on Delinquent Real Property Taxes.
- Exhibit 3: MUD's 2024 tax statement—posted on October 8, 2024—talked about a 20% penalty imposed from July 1, 2025, but the MUD passed and adopted the resolution on April 21, 2025.
- Exhibit 4: February 3, 2026 emails the plaintiff sent to the defendant MUD, the MUD's tax collector **Wheeler & Associates**, and the MUD's attorney **Schwartz, Page & Harding**, asking them to take prompt actions, invalidate the April 21, 2025 resolution, and reverse its adverse impacts.
- Exhibit 5: List of over 100 districts administered by the law firm of **Schwartz, Page & Harding**.

I. THE ACTION

(1) This action seeks a Temporary Restraining Order, a Temporary Injunction, and a Declaratory Judgment because an April 21, 2025 resolution [**Exhibit 2**] on additional penalty imposed on delinquent real property taxes (Tax Code § 33.07), passed and adopted by a municipal utility district—the defendant in the instant cause, breaches Tax Code § 33.07(a). The resolution sets the additional penalty at 20% while a May 20, 2002 Tax Collection Agreement [**Exhibit 1**] sets the delinquent tax attorney's compensation at 15%. In result, the April 21, 2025 resolution is invalid, null, and void on its face.

II. PARTIES AND SERVICE OF PROCESS

(2) Residing in Katy, Fort Bend County, Texas, the plaintiff, George J. Wakileh, is a taxpayer served by the defendant, [Grand Lakes Municipal Utility District # 2](#) (“MUD”).

(3) The MUD holds its monthly meetings at the office of the law firm of [Schwartz, Page & Harding](#) (1300 Post Oak Blvd #2400, Houston, TX 77056). The Constable will be asked to serve the president of the MUD’s board of directors at his Katy residence. The MUD is governed by a five-member board of directors. The five officers are:

- Michael Christopher McClusky	president	mike.mcclusky@gmail.com
- J. Scot Vann	vice president	jsvann@edge-es.com
- Gregory Jay Henry	secretary	gghenry@xpernet.com
- Bradley Allen Baker	assistant secretary	brad.a.baker@outlook.com
- William Donald Butler	director	don.butler@cbhou.com

(4) The MUD’s attorney, the law firm of [Schwartz, Page & Harding](#), has the address: 1300 Post Oak Blvd #2400, Houston, TX 77056 | Ph: 713-623-4531 | <https://www.sphllp.com/>. Those involved at the firm are:

- Joseph M. Schwartz	managing partner	jschwartz@sphllp.com
- Mitchell Page	founding partner	mepage@sphllp.com
- Christopher Todd Skinner	attorney	cskinner@sphllp.com
- Gordon Christopher Cranner	attorney	gcranner@sphllp.com
- Melia Berry	paralegal	mberry@sphllp.com

(5) The MUD’s tax collector, [Wheeler & Associates](#), has the following address: 6935 Barney Road #110, Houston, TX 77092 | Phone: 713-462-8906 | <https://www.wheelerassoc.com/>. The business is managed by Catherine Wheeler <catherine.w@wheelerassoc.com>.

III. DISCOVERY CONTROL PLAN

(6) Discovery in the instant case is to be controlled by a (Level 1) Discovery Control Plan, as described in Texas Rules of Civil Procedure, Rule 190.2. In principle, no discovery is needed because the petition is supported by the evidence (the Tax Collection Agreement and a resolution on additional penalty imposed on delinquent real property taxes) the court needs to examine the MUD’s compliance with Tax Code § 33.07. The court might need to examine the MUD’s contracts with its attorney, [Schwartz, Page & Harding](#), and tax collector, [Wheeler & Associates](#). In promptly furnishing the two contracts as PDF documents, the defendant MUD will contribute to an expeditious disposition of this case.

IV. JURISDICTION AND VENUE

A. The Parties’ Whereabouts

(7) The plaintiff resides in Katy, Fort Bend County, and is served by the defendant MUD. The MUD serves land, residences, and businesses in Katy, Fort Bend County, but holds its monthly meetings at the address “1300 Post Oak Blvd #2400, Houston, TX 77056”, the office of its attorney/ counsel [Schwartz, Page & Harding](#) (see <https://www.grandlakesmud2.com/board-of-directors>).

(8) Jurisdiction and venue of this case properly lie in Fort Bend County because: [i] The MUD serves land, residences, and businesses in Fort Bend County and a suit against it must be lodged with a Fort Bend County district court. [ii] The MUD’s seat cannot be in Houston, Harris County, just because the MUD holds its monthly meetings there, at the office of the law firm of [Schwartz, Page & Harding](#).

(9) The trial court proceeding is governed by Texas Civil Practice and Remedies Code, Texas Rules of Civil Procedure, Texas Rules of Evidence, and Federal Rules of Civil Procedure. The United States Constitution, Texas Constitution, Tax Code, Water Code, Government Code (Open Meetings Act, Public Information Act, and Administrative Procedure Act), Local Government Code, and Administrative Code govern the adjudication of the instant cause.

B. The Court's Jurisdiction

(10) Water Code § 13.002(13-a) defines a Municipal Utility District (MUD) as a political subdivision of the state of Texas operating under Texas Water Code, Chapter 54. Under Water Code § 54.011, a MUD may be created under and subject to the authority, conditions, and restrictions of Article XVI, § 59, of the Texas Constitution. A MUD is a District per Texas Water Code § 49.001(a)(1). A MUD is more like a Retail Public Utility (16 Texas Administrative Code § 24.3(31)).

(11) The district court has jurisdiction to adjudicate the MUD's compliance with the Tax Code. Also, this action seeks non-monetary relief and an award of costs, expenses, and court filing fees. The damages sought are within the jurisdictional limits of the court.

V. BACKGROUND

A. The MUD's Structure

(12) Grand Lakes is a community in Katy, Fort Bend County, Texas, with 38 commercial entities and 2,739 residences falling within the jurisdiction of three Municipal Utility Districts (MUDs)—MUD # 1, MUD # 2, MUD # 4—and a Water Control and Improvement District (WCID).

(13) The four water districts (three MUDs and WCID) are within Houston's extraterritorial jurisdiction (ETJ), a five-mile band around Houston's general-purpose boundaries. Each of the three MUDs has a Strategic Partnership Agreement (SPA) with the City of Houston, through which the 1% sales and use tax paid by buyers to retailers is split equally (0.5% for each) between the City of Houston and the MUD.

(14) Residences and businesses within the Grand Lakes community are also members of the Grand Lakes Community Association (GLCA), which has the responsibility for neighborhood upkeep. GLCA is a non-profit corporation registered with Taxpayer ID# 32000119951 and Texas SOS File Number 0145900101.

(15) The three Grand Lakes MUDs serve land, commercial entities, and residences as summarized below. The three Grand Lakes MUDs cover 1,390 acres (2.17 sq mi; 1.4737 mi x 1.4737 mi; or 7,781 ft x 7,781 ft). This area is only 0.25% of the area covered by Fort Bend County (861.8 sq mi | census data).

Grand Lakes	MUD 4	MUD 1	MUD 2	Total
Land, acres	520	393	477	1,390
Residences	985	1,072	682	2,739
Commercial entities	?	?	10	38

(16) Current board members for Grand Lakes MUD # 2, the defendant in the instant suit, are:

- | | |
|--|---|
| - Michael Christopher McClusky, President | Retired insurance agent |
| - J. Scot Vann, Vice President | Owner of environmental consulting company
Edge Engineering & Science ¹ |
| - Gregory Jay Henry, Secretary | Owner of computer services company Xpernet Services ² and
property management company KPM Management ³ |
| - Bradley Allen Baker, Assistant Secretary | Electrical engineer at ChampionX ⁴ |
| - William Donald Butler, Director | Commercial banker at Central Bank ⁵ (Houston). |

1 <https://edge-es.com/>

2 <https://www.xpernet.com/>

3 <https://kpmcommunities.com/>

4 <https://www.championx.com/>

5 <https://www.cbhou.com/>

(17) The three Grand Lakes MUDs and the Grand Lakes WCID are local governments (political subdivisions of the state) that serves land, residences, and businesses in Katy, Fort Bend County, but hold their monthly meetings at the address ‘1300 Post Oak Blvd #2400, Houston, TX 77056’; the address for the law firm of [Schwartz, Page & Harding](#), attorney for the four water districts.

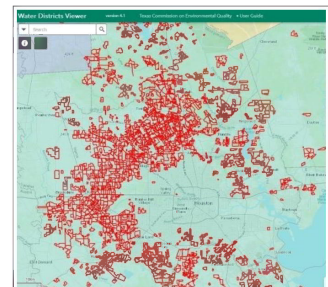
(18) While the four Grand Lakes water districts (three MUDs and WCID) cover a very small area (1,390 acres or 2.17 sq mi) and should be one district, all four districts are administered by the same consultants; the Tax Collector being an exception. The consultants are: Counsel/Attorney (the law firm of [Schwartz, Page & Harding](#)), operator (the water company Municipal District Services | [MDS Water](#)), Engineer ([Pape-Dawson Consulting Engineers](#)), Bookkeeper ([Municipal Accounts & Consulting](#)), Auditor ([Forvis Mazars](#)), and Financial Advisor ([Masterson Advisors](#)). This scheme is the perfect recipe for wrongdoing, complicity, instruction, fraud, tampering, abuse, and conflict of interest. And to no one’s surprise, the scheme is exploited to the fullest by said consultants, under the premeditated direction of the [Schwartz, Page & Harding](#) staff.

	MUD No. 1	MUD No. 2	MUD No. 4	WCID
Counsel/Attorney	Schwartz, Page & Harding			
Operator	Municipal District Services			-
Engineer	Pape-Dawson Engineers			
Solid Waste Collector	Best Trash			-
Financial Advisor	Masterson Advisors			
Bookkeeper	Municipal Accounts & Consulting			
Auditor	Forvis Mazars			
Tax Collector	Assessments of the Southwest	Wheeler & Associates		B&A Municipal Tax Services
Delinquent Tax Attorney	Perdue Brandon Fielder Collins & Mott			
Communications	Touchstone District Services			-

(19) The law firm of [Schwartz, Page & Harding](#) administers over 100 districts as listed in [\[Exhibit 5\]](#). Putting this list together was not an easy task—consciously, the law firm shields itself by not listing its name when registering a district. Rather, it lists the district’s name and president of the board together with the law firm’s address and phone number (1300 Post Oak Blvd #2400, Houston, TX 77056 | Tel: 713-623-4531). To find the many districts the law firm administers, one has to search multiple district databases for the address ‘1300 Post Oak Blvd, Houston, TX 77056’ or phone number ‘713-623-4531’.

(20) Per a March 11, 2024 email from TCEQ, the state of Texas has 2,735 active and inactive districts, with the Greater Houston area hosting 1,416 districts. The breakdown by county for the Greater Houston area is shown below. This frightening picture is also depicted in a view/map of the Greater Houston area with the different districts marked in red.

Harris County: 633	Liberty County: 42
Fort Bend County: 278	Chambers County: 24
Montgomery County: 248	Matagorda County: 15
Brazoria County: 92	Austin County: 11
Galveston County: 72	Wharton County: 9
Waller County: 53	



(21) In result, the Greater Houston area hosts slightly over 50% of the districts in the state of Texas. Houston-based law firm of [Schwartz, Page & Harding](#) administers 8.7% of the districts in Harris County, Fort Bend County, and Montgomery County. It also administers 3.7% of the districts in the state of Texas. This law firm knows exactly what it is doing. The violations orchestrated and executed by the [Schwartz, Page & Harding](#) actors are nothing short of criminal.

B. Factual and Legal Bases

(22) On May 20, 2002 the defendant MUD executed a Tax Collection Agreement [**Exhibit 1**] with a delinquent tax attorney, [Perdue Brandon Fielder Collins & Mott](#). In the agreement, “Attorneys” refers to [Perdue Brandon Fielder Collins & Mott](#), the delinquent tax attorney; “SPH” refers to [Schwartz, Page & Harding](#); and “District” refers to [Grand Lakes Municipal Utility District # 2](#).

(23) Paragraph 2 of the agreement reads in part:

2. DUTIES OF ATTORNEYS. Attorneys shall represent the District in an efficient, diligent and business-like manner, including:

(a)

(b) Upon receipt of authorization to proceed [with the collection of delinquent tax accounts], Attorneys shall:

(i) Send an initial collection letter to the owner or designated agent shown on the District's most current delinquent tax roll for each delinquent real or personal property tax account which Attorneys are authorized to collect; and

(ii) ...

(c) Attorneys shall not file suit on any delinquent account until receipt of specific written authorization of the District or SPH to do so. Upon receipt of such authorization, Attorneys shall file suit against all parties owning or claiming any interest in the property which is subject to the District's lien for the collection of delinquent taxes. Attorneys shall not proceed to levy and execution of judgment or foreclosure of the District's lien on any delinquent account until receipt of specific written authorization of the District or SPH to do so.

(d) ... which Attorneys have been authorized to collect.

(24) Paragraph 8 of the agreement reads:

8. **NOTICES**. Any notices required or permitted to be given under this Agreement shall be sufficient if in writing, and if sent by certified or registered mail, return receipt requested, to each party at their respective addresses shown below:

Schwartz, Page & Harding, L.L.P.
Attention: Joseph M. Schwartz
1300 Post Oak Blvd., Suite 1400
Houston, TX 77056

Perdue, Brandon, Fielder, Collins & Mott, L.L.P.
Attention: Carl O. Sandin
1235 North Loop West, Suite 600
Houston, TX 77008

Grand Lakes Municipal Utility District No. 2
c/o Joseph M. Schwartz
Schwartz, Page & Harding, L.L.P.
1300 Post Oak Blvd., Suite 1400
Houston, TX 77056

(25) Paragraph 5 of the agreement reads in part:

5. COMPENSATION TO ATTORNEYS. In consideration of the services to be rendered by the Attorneys for the District as described above, the District agrees to compensate the Attorneys on a contingency fee basis as follows:

(a) If a delinquent tax account is paid prior to the filing of suit, Attorneys shall be entitled to receive from the District fifteen percent (15%) of the taxes, penalties, and interest collected on such delinquent account as attorney's fees.

(b) If a delinquent tax suit is filed to collect a delinquent account, Attorneys shall be entitled to receive fifteen percent (15%) of the taxes, penalties and interest collected on such delinquent account, or the attorney's fees actually awarded in such suit, whichever is greater.

(c) For purposes only of calculating the Attorney's compensation under this paragraph, any additional penalty levied by the District pursuant to Section 33.07 of the Texas Property Tax Code and collected by Attorneys shall not be considered as "taxes, penalty or interest" and Attorneys shall not be entitled to receive fifteen percent (15%) of such amount.

...

(26) Tax Code § 33.07(a) reads in part: "... The amount of the penalty may not exceed the amount of the compensation specified in the contract with the attorney to be paid in connection with the collection of the delinquent taxes."

(27) On April 21, 2025, the MUD's attorney, Christopher Todd Skinner of Schwartz, Page & Harding, orchestrated and managed to pass and adopt a "Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes" [**Exhibit 2**]. Said resolution is illegitimate for unmistakable breach of Tax Code § 33.07(a). The resolution arbitrarily set the additional penalty to 20%, but that penalty cannot—per Tax Code § 33.07(a)—be greater than 15%; the delinquent tax attorney's compensation specified in the Tax Collection Agreement [**Exhibit 1**].

(28) Next is how the resolution is addressed in the MUD's April 21, 2025 board meeting minutes. See https://www.grandlakesmud2.com/static/b822e8ac1d391d5c5a836b8146e348cd/Minutes_April_4_2025_amended_18bd95184e.pdf.

RESOLUTION AUTHORIZING AN ADDITIONAL PENALTY ON DELINQUENT REAL PROPERTY TAXES

The Board considered the adoption of a Resolution Authorizing an Additional Penalty on Delinquent Real Property Taxes. Mr. Skinner advised the Board that it is authorized pursuant to Section 33.07 of the Texas Tax Code, as amended, to impose, under certain conditions on July 1, an additional penalty not to exceed twenty percent (20%) of the total taxes, penalty and interest due the District on taxes that remain delinquent as of July 1 of the year in which they became delinquent. He noted that the additional penalty to be imposed by this Resolution will not apply to delinquent personal property taxes which have incurred an additional penalty pursuant to that certain Resolution Authorizing an Additional Penalty on Delinquent Personal Property Taxes, which was passed and approved by the District on January 20, 2025. After further discussion, it was moved by Director Vann, seconded by Director Henry, and unanimously carried, that the Resolution Authorizing an Additional Penalty on Delinquent Real Property Taxes, a copy of which is attached hereto as **Exhibit E**, be adopted by the District, and that Perdue be authorized to proceed with the collection of the District's 2024 delinquent real property tax accounts on July 1, 2025, subject to proper notice having been given as provided in said Resolution, including the filing of lawsuits as necessary.

(29) Posted on October 8, 2024, the MUD's 2024 tax statement [**Exhibit 3**] already talked about a 20% penalty imposed from July 1, 2025 while the MUD did not pass and adopt a formal resolution on penalty until April 21, 2025 [**Exhibit 2**]. Said resolution is illegitimate as explained earlier.

(30) On February 3, 2026, the plaintiff sent three emails [**Exhibit 4**] to the defendant MUD, the MUD's attorney [Schwartz, Page & Harding](#), and the MUD's tax collector [Wheeler & Associates](#), asking them to take immediate actions to invalidate the April 21, 2025 resolution and reverse all adverse impacts of said resolution. None of the three parties bothered to respond.

(31) The plaintiff checked the 2020, 2021, 2022, and 2023 Grand Lakes MUD # 2 tax statements and found them all to be non compliant, just like the 2024 tax statement.

First, normally posted in October of the tax year, said tax statements talked about a 20% additional penalty on delinquent taxes, while the corresponding resolution was not passed and adopted until April of the following year (some six months later).

Second, in April 2021, 2022, 2023, and 2024, the MUD passed and adopted resolutions that imposed a 20% penalty on delinquent taxes, even though the penalty could not exceed 15%; the delinquent tax attorney's compensation specified in the Tax Collection Agreement [**Exhibit 1**]. The resolutions are addressed in the respective board meeting minutes with almost the exact same text in paragraph (28) copied and pasted again and again. And in almost all years, it was J. Scot Vann (vice president of the MUD's board) who moved to adopt the resolution with the motion seconded by either or Gregory Jay Henry (secretary of the MUD's board) or Bradley Allen Baker (assistant secretary of the MUD's board).

Third, in the 2020 to 2024 tax years, the MUD and its tax collector collected a 20% penalty on delinquent taxes in accordance with the adopted resolutions, even though the penalty could not exceed 15%; the delinquent tax attorney's compensation specified in the Tax Collection Agreement [**Exhibit 1**].

(32) With reference to paragraph (23) above, the May 20, 2002 Tax Collection Agreement [**Exhibit 1**] is illegitimate. Said agreement entitles the MUD's attorney to arbitrarily and unilaterally file tax delinquency and property foreclosure suits without informing the MUD's board of directors; getting a formal authorization from the MUD's board; or abiding by the requirement that the MUD's officers deliberate and vote on all MUD matters in open, public meetings (Government Code §§ 551.041, 551.042, 551.043). But MUDs are designed to be governed by a board of directors from the residents, not by the MUD's attorney. MUDs are designed to conduct their business in public, open meetings. The MUD's attorney cannot conduct the MUD's business through his own decisions, taken in his office, home, or car. Only the MUD's board can bind the MUD legally, contractually, financially, and commercially. The MUD's attorney does not have this privilege or power.

VI. ACTS SOUGHT TO BE ENFORCED

(33) Immediate corrective actions need to be taken by the MUD to remedy wrongdoing, stop imposing an illegitimate penalty, and abide by the Tax Code. A Temporary Restraining Order, a Temporary Injunction, and a Declaratory Judgment as reflected in the Prayer detail the acts sought to be enforced.

VII. APPLICANT'S BOND

(34) Under TRCP 684, the trial court enjoys discretion in fixing the amount of the bond, but such a discretion is subject to review. For good cause and the proper administration of justice, the applicant requests that the trial court require no bond whatsoever in the instant case. The defendant endures no monetary damages because of the restraining order, temporary injunction, and final declaratory judgment. The defendant is under an unconditional obligation to comply with the law, but it has not. The MUD's attorney – that administers over 100 districts in the state of Texas (*see* **Exhibit 5**) – cannot invoke confusion, ignorance, or negligence. In the absence of rigorous state oversight of MUDs, the MUD's

attorney became arrogant, indifferent, and fearless; consciously orchestrating endless punishable schemes aimed at defrauding the MUD and the residences and businesses served by the MUD. The May 20, 2002 Tax Collection Agreement is questionable at best. The April 21, 2025 “Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes” is void on its face. Both must be invalidated. On February 3, 2026 [Exhibit 4], the plaintiff wrote to the MUD’s board members, MUD’s attorney, and MUD’ tax collector, asking them to take immediate corrective actions and implement preventive actions. They did not bother to respond. As of March 3, 2026, all tax statements issued by Wheeler & Associates, the MUD’s tax collector, continue to reference and apply a 20% penalty.

VIII. PRAYER

(35) Via a temporary restraining order, and until a temporary injunction hearing is held, the court orders the MUD and its tax collector, Wheeler & Associates, to immediately but temporarily stay the application of the 20% penalty to any of the MUD’s 2024 tax statements.

(36) Following a hearing held in accordance with TRCP rules, the court issues a temporary injunction order that prevents the application of the 20% penalty to the MUD’s 2024 tax statements until a final trial.

(37) Upon final hearing, the plaintiff prays that:

- a- The court declare null, void, and invalid the May 20, 2002 Tax Collection Agreement (see ¶ (32)).
- b- The court declare null, void, and invalid the “Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes” passed and adopted by Grand Lakes Municipal Utility District # 2 on April 21, 2025.
- c- The court order that the MUD's tax collector, Wheeler & Associates, correct all tax statements it issued in 2020, 2021, 2022, 2023, 2024, 2025, or 2026; remove any reference to the 20% additional penalty; revise all relevant tax statements by removing the 20% additional penalty; and reimburse all those impacted by the penalty.
- d- The court order that the MUD's tax collector not apply a 15% additional penalty either, because there is no formal resolution by the MUD that lawfully effectuates such a penalty.
- e- The court order the MUD to inform its taxpayers of the violation by posting a notice on the MUD's website (<https://www.grandlakesmud2.com/>).
- f- The court order the defendant to pay the plaintiff’s fees for time and work on this suit, expenses, and costs of court.
- g- The court grant such other and further relief to which the plaintiff is justly entitled.

Katy, Texas, on this 3rd day of March, 2026.

Respectfully submitted,

/s/ George J. Wakileh

George J. Wakileh, Ph.D.

xxxx xxxxxxxx xxxx xx

xxxxx xx xxxxxxxxxx

george.wakileh@gmail.com

Affidavit / Verification

As a resident and taxpayer served by [Grand Lakes Municipal Utility District # 2](#) (“MUD”), I have personal knowledge of said MUD and its services, practices, and governance. My petition is supported by irrefutable evidence (a Tax Collection Agreement and a resolution on additional penalty imposed on delinquent real property taxes) of the MUD’s noncompliance with Tax Code § 33.07(a). The resolution sets the additional penalty to 20%, but that penalty cannot—per Tax Code § 33.07(a)—be greater than 15%; the delinquent tax attorney’s compensation specified in the Tax Collection Agreement. I am impacted by the breach just like all 682 residences and 10 businesses served by the MUD. I declare under penalty of perjury that the foregoing, my petition, and the exhibits are true and correct to the best of my knowledge and belief.

Executed in Katy, Fort Bend County, Texas, this 3rd day of March, 2026.

/s/ George J. Wakileh
George J. Wakileh, Ph.D.

Exhibit List

- Exhibit 1: Tax Collection Agreement between Grand Lakes MUD # 2 and a delinquent tax attorney.
- Exhibit 2: April 21, 2025 Resolution Authorizing Additional Penalty on Delinquent Real Property Taxes.
- Exhibit 3: MUD’s 2024 tax statement—posted on October 8, 2024—talked about a 20% penalty imposed from July 1, 2025, but the MUD passed and adopted the resolution on April 21, 2025.
- Exhibit 4: February 3, 2026 emails the plaintiff sent to the defendant MUD, the MUD’s attorney [Schwartz, Page & Harding](#), and the MUD’s tax collector [Wheeler & Associates](#), asking them to take immediate actions to invalidate the April 21, 2025 resolution and reverse its adverse impacts.
- Exhibit 5: List of over 100 districts administered by the law firm of Schwartz, Page & Harding.

Exhibit 1

TAX COLLECTION AGREEMENT

THIS AGREEMENT made this 20th day of May, 2002, among SCHWARTZ, PAGE & HARDING, L.L.P., Attorneys at Law ("SPH"), PERDUE, BRANDON, FIELDER, COLLINS & MOTT, L.L.P. (the "Attorneys") and GRAND LAKES MUNICIPAL UTILITY DISTRICT # 2 (the "District").

WITNESSETH

WHEREAS, SPH has recommended that the District hire special counsel, pursuant to Section 6.30 of the Texas Property Tax Code, to enforce the collection of delinquent taxes for the years 2001 and prior; and

WHEREAS, SPH and the Attorneys have determined that they can jointly provide such services to the District in a manner which is most economical and beneficial to the District;

NOW, THEREFORE, the District, SPH and Attorneys hereby agree as follows:

1. **EMPLOYMENT.** The District hereby retains the services of Attorneys and SPH to represent the District's interest in collecting any and all delinquent and outstanding taxes, both real and personal:

- (a) For the Tax year 2001 and all prior year accounts; and
- (b) For such subsequent year accounts as may be authorized by the District from time to time;

subject to termination as hereinafter provided.

2. **DUTIES OF ATTORNEYS.** Attorneys shall represent the District in an efficient, diligent and business-like manner, including:

(a) Upon delivery of a copy of this Agreement executed by both the District and SPH, Attorneys shall be authorized to proceed with the collection of delinquent tax accounts as of the following dates:

(i) For years prior to 2001, Attorneys shall be authorized to begin collection efforts immediately; and

(ii) For 2001 delinquent accounts, Attorneys shall be authorized to begin collections efforts on July 1, 2002;

(iii) Unless such executed Agreement is accompanied by a letter from SPH modifying such authorization as to all accounts or any specific account enumerated therein.

(b) Upon receipt of authorization to proceed, Attorneys shall:

(i) Send an initial collection letter to the owner or designated agent shown on the District's most current delinquent tax roll for each delinquent real or personal property tax account which Attorneys are authorized to collect; and

(ii) Perform a title and lien search, at no cost to the District, for each real property account on which payment has not been received by the District's Tax Assessor/Collector by the last day of the month following the month in which the initial collection letter is sent.

- (c) Attorneys shall not file suit on any delinquent account until receipt of specific written authorization of the District or SPH to do so. Upon receipt of such authorization, Attorneys shall file suit against all parties owning or claiming any interest in the property which is subject to the District's lien for the collection of delinquent taxes. Such suit shall include claims for all delinquent taxes, penalties and interest then owing against said property, the cost of all title search and court costs incurred in filing suit, and foreclosure of the District' tax lien, all as provided by the Texas Property Tax Code. Attorneys shall not proceed to levy and execution of judgment or foreclosure of the District's lien on any delinquent account until receipt of specific written authorization of the District or SPH to do so. Notwithstanding anything contained herein to the contrary, when Attorneys are informed that other jurisdictions have filed or intend to file suit to foreclose their tax liens for delinquent taxes, Attorneys may without prior notice or approval from the District file a Petition in Intervention or join the litigation as co-plaintiff to protect the interests of the District.
- (d) Attorneys also agree to make such oral or written reports to SPH as it shall from time to time require as to the status of Attorneys' efforts to collect the delinquent taxes authorized by this Agreement. Attorneys agree to provide SPH, at their request, with copies of any and all correspondence, pleadings and title documents relating to any delinquent tax account which Attorneys have been authorized to collect.
3. **DUTIES OF SPH.** SPH agrees to supervise the efforts of Attorneys and attend all

meetings of the Board of Directors of the District to report upon the status of all delinquent tax collection efforts by Attorneys pursuant to this Agreement. SPH shall also be responsible for obtaining information from and the cooperation of the District's Tax Assessor/Collector, Engineer, Operator and other consultants and employees of the District, when required by Attorneys in the performance of this Agreement.

4. **DUTIES OF THE DISTRICT.** The District shall cause its Tax Assessor/Collector to provide Attorneys with copies of the District's current delinquent tax roll on a monthly basis, and Attorneys shall be entitled to presume that the information contained in any such tax roll is accurate and complete. District shall also cause its Tax Assessor/Collector to provide Attorneys with a copy of its monthly report, which shall be mailed to Attorneys not later than the same date that such report is presented to the District's Board of Directors. Fees paid to Attorneys for their efforts, as provided below, shall be calculated in accordance with said monthly reports and District Agrees to pay Attorneys' invoices within thirty (30) days of receipt of same.

5. **COMPENSATION TO ATTORNEYS.** In consideration of the services to be rendered by the Attorneys for the District as described above, the District agrees to compensate the Attorneys on a contingency fee basis as follows:

- (a) If a delinquent tax account is paid prior to the filing of suit, Attorneys shall be entitled to receive from the District fifteen percent (15%) of the taxes, penalties, and interest collected on such delinquent account as attorney's fees.

- (b) If a delinquent tax suit is filed to collect a delinquent account, Attorneys shall be entitled to receive fifteen percent (15%) of the taxes, penalties and interest collected on such delinquent account, or the attorney's fees actually awarded in such suit, whichever is greater.
- (c) For purposes only of calculating the Attorney's compensation under this paragraph, any additional penalty levied by the District pursuant to Section 33.07 of the Texas Property Tax Code and collected by Attorneys shall not be considered as "taxes, penalty or interest" and Attorneys shall not be entitled to receive fifteen percent (15%) of such amount.
- (d) Attorneys will be entitled to receive compensation at the Attorneys' standard hourly rate then in effect for any services that Attorneys perform after property has been conveyed to the District as a result of a foreclosure sale or any other reason. SPH shall not be entitled to any portion of such compensation.
- (e) Calculation of the attorney's fee portion of Attorneys' invoice shall be determined by the Tax Assessor/Collector's monthly report to the District.

6. **COMPENSATION TO SPH.** In consideration of the services to be rendered for Attorneys by SPH as described in Paragraph Three (3) above, Attorneys agree to compensate SPH as follows:

- (a) For any month in which the attorney's fees invoiced by Attorneys to District (exclusive of reimbursable costs and any prior month's balance) is equal to or greater than \$1,500.00, SPH shall be entitled to receive one-third (1/3) of such fees when received by Attorneys from District.
- (b) For any month in which the Attorney's fees invoiced by Attorneys to District is less than \$1,500.00, SPH shall not be entitled to any portion of such fees.
- (c) Any fees earned by SPH pursuant to this Paragraph shall be paid by Attorneys within fifteen (15) days of the last day of the month in which payment is actually received by Attorneys from District. In the event of a partial payment to Attorneys by District, SPH shall be entitled to a pro rata payment of their compensation in the same manner.

7. **TERMINATION.** The District may terminate this Tax Collection Agreement by giving SPH and Attorney forty-five (45) days prior written notice of its intention to terminate as to each account upon which there is no litigation pending on the date such notice is received by Attorneys. Attorneys shall be entitled to ninety (90) days notice of termination on accounts upon which litigation is pending. Between the date of the receipt of the notice and the date of termination, Attorneys shall be entitled to continue collection efforts and shall invoice District, within forty-five (45) days after the termination date, for all delinquent tax accounts collected and reimbursable costs expended prior to the termination date.

8. **NOTICES.** Any notices required or permitted to be given under this Agreement shall be sufficient if in writing, and if sent by certified or registered mail, return receipt requested, to each party at their respective addresses shown below:

Schwartz, Page & Harding, L.L.P.
Attention: Joseph M. Schwartz
1300 Post Oak Blvd., Suite 1400
Houston, TX 77056

Perdue, Brandon, Fielder, Collins & Mott, L.L.P.
Attention: Carl O. Sandin
1235 North Loop West, Suite 600
Houston, TX 77008

Grand Lakes Municipal Utility District No. 2
c/o Joseph M. Schwartz
Schwartz, Page & Harding, L.L.P.
1300 Post Oak Blvd., Suite 1400
Houston, TX 77056

9. **TERM.** The Attorneys are hereby retained under this Tax Collection Agreement as of the date hereof for a period of one (1) year unless sooner terminated as provided herein. The term of this Agreement shall be automatically extended from year to year unless notice of non-renewal is given by Attorneys or the district to the other parties at least thirty (30) days prior to any anniversary date of this Agreement. In the event of a renewal of the Agreement, Attorneys shall be authorized to proceed with the collection of all subsequent year delinquent accounts on July 1 of the year in which the renewal occurs, unless otherwise instructed in writing by SPH prior to that date.

10. **DESIGNATION OF LIAISON.** District hereby appoints Joseph M. Schwartz of the firm Schwartz, Page & Harding, L.L.P. to act as its liaison with Attorneys to authorize any action on behalf of the District in the performance of this Agreement.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the date first above written.

SCHWARTZ, PAGE & HARDING, L.L.P.

By: 
JOSEPH M. SCHWARTZ

PERDUE, BRANDON, FIELDER, COLLINS & MOTT, L.L.P.

By: 
CARL O. SANDIN, PARTNER

GRAND LAKES MUNICIPAL UTILITY DISTRICT # 2

By: 
A. BRANTON KOTCH, PRES.

ATTEST:



Secretary DONNA A. WEDLICK



Exhibit 2

RESOLUTION AUTHORIZING
AN ADDITIONAL PENALTY ON DELINQUENT REAL PROPERTY TAXES

Whereas, the Board of Directors of Grand Lakes Municipal Utility District No. 2 (the "District") is desirous of defraying the costs of collection of delinquent taxes; and

Whereas, the District has contracted with an attorney for collection of delinquent taxes as set forth in Section 6.30 of V.T.C.A. Tax Code, as amended ("Tax Code"); and

Whereas, Section 33.07 of the Tax Code, as amended, provides that, if the District has contracted with an attorney under Section 6.30 of the Tax Code, as amended, for collection of the District's delinquent taxes, the District may impose an additional penalty not to exceed the amount of the compensation specified in the contract with the attorney to be paid in connection with the collection of the delinquent taxes on taxes that become delinquent on or after February 1 of a year but not later than May 1 of that year and that remain delinquent on July 1 of the year in which they become delinquent; and

Whereas, Section 33.08 of the Tax Code, as amended, provides that if the District imposes the additional penalty for collection costs under Section 33.07 of the Tax Code, as amended, and has contracted with an attorney under Section 6.30 of the Tax Code, as amended, for collection of the District's delinquent taxes, the District may impose an additional penalty not to exceed the amount of the compensation specified in the contract with the attorney to be paid in connection with the collection of the delinquent taxes on taxes that become delinquent on or after June 1 of a year; and

WHEREAS, said Section 6.30 provides that said compensation shall not exceed twenty percent (20%) of the amount of delinquent tax, penalty and interest collected. Therefore,

BE IT RESOLVED BY THE BOARD OF DIRECTORS OF GRAND LAKES MUNICIPAL UTILITY DISTRICT NO. 2, THAT:

Section 1. The District has entered into a contract with an attorney pursuant to Section 6.30 of the Texas Tax Code, as amended, for the collection of delinquent taxes, penalty and interest.

Section 2. District taxes that become delinquent on or after February 1 of a year but not later than May 1 of that year and that remain delinquent on July 1 of the year in which such taxes become delinquent shall incur an additional penalty of twenty percent (20%) on the amount of such taxes, penalty and interest to defray the costs of collection of said delinquent taxes, in accordance with Section 33.07 of the Tax Code, as amended.

Section 3. District taxes that become delinquent on or after June 1 of a year shall incur an additional penalty of twenty percent (20%) of the amount of such taxes, penalty and interest on the first day of the first month that begins at least twenty-one (21) days after the date the notice of delinquency and penalty are sent, in accordance with Section 33.08 of the Tax Code, as amended.

Section 4. The District's tax collector shall deliver a notice of delinquency and of the penalty imposed pursuant to Section 2 above to the property owner at least thirty (30) and not more than sixty (60) days before July 1.

Section 5. The District's tax collector shall deliver a notice of delinquency and of the penalty imposed pursuant to Section 3 above to the property owner.

Section 6. Notwithstanding any provision in this Resolution to the contrary, the additional penalty imposed hereunder shall not apply to delinquent personal property taxes which have incurred an additional penalty pursuant to that certain Resolution Authorizing An Additional Penalty on Delinquent Personal Property Taxes passed and approved by the District on the 20th day of January, 2025.

PASSED AND ADOPTED this the 21st day of April, 2025.

GRAND LAKES MUNICIPAL
UTILITY DISTRICT NO. 2

ATTEST:

By: _____

Secretary,
Board of Directors



By: _____

President,
Board of Directors



Exhibit 3

GRAND LAKES MUD #2
 Catherine Wheeler, Tax A/C
 6935 Barney Rd. #110
 Houston TX 77092
 (713) 462-8906
 www.wheelerassoc.com

**2024
TAX STATEMENT**



Owner Name and Address:

Orig. Billing Date	10/8/2024
Delinquent Date	2/1/2025
Jurisdiction Code	M121
CAD No	
Billing Type	

Property Information	
Grand Lakes	
Acreage:	

Service Address	

Tax Unit	Assessment Ratio	Taxable Value	Tax Rate Per \$100
Grand Lakes MUD #2	100%		0.1345420
Tax Levied			
Total Amount Due Upon Receipt			

Valuation	
Land	
Improvements	
Homestead Cap	
Homestead Exemption	
Total Taxable	

Tax Year	Appraised Value	Taxable Value	Tax Rate	Tax Amount	Diff.
5 Year History With Tax Amount Percent Gain/Loss					
2024			0.1345420		
2023			0.1303500		
2022			0.1300000		
2021			0.1500000		
2020			0.18000		
2019			0.24000		
5 Year Comparison With Percent Gain/Loss					
2024			0.1345420		
2019			0.24000		

TAXES ARE DUE UPON RECEIPT

TAXES WILL BECOME DELINQUENT AFTER JANUARY 31ST. MAIL MUST BE POST-MARKED ON OR BEFORE JANUARY 31 TO AVOID PENALTY AND INTEREST.

Payments received after January 31st are subjected to the following penalty and interest schedule. Add 1% interest each month thereafter.

Feb 6%+1%	Apr 8%+3%	Jun 10%+5%
Mar 7%+2%	May 9%+4%	Jul 12%+6% **

** An additional one time charge of 20% for collection will be added after June 30.

Please contact the appraisal district concerning any corrections in ownership, address changes, valuation protests or exemptions. Value is based on 100% market value. Late application for Ag Open Space, Timber - 10% penalty. Late filing of renditions - 10% penalty.

Note 1: Property Owners in the State of Texas are entitled to certain exemptions that reduce the amount of taxes that they pay. There may be a general homestead exemption for persons who own and occupy their home on or before January 1. There may be an exemption available on the homestead for persons over 65 years of age or are disabled. These exemptions vary depending upon the governing body. Disabled veterans may file a partial exemption on their property.

YOU SHOULD CONTACT THE APPRAISAL DISTRICT REGARDING ANY ENTITLEMENT, DEFERMENT OR EXEMPTIONS YOU MAY HAVE. IF THE PROPERTY DESCRIBED IN THIS DOCUMENT IS YOUR RESIDENCE HOMESTEAD, YOU SHOULD CONTACT GRAND LAKES MUD #2 REGARDING A RIGHT YOU MAY HAVE TO ENTER INTO AN INSTALLMENT AGREEMENT DIRECTLY WITH GRAND LAKES MUD #2 FOR THE PAYMENT OF THESE TAXES.

Please mail this portion and payment in the enclosed envelope.

* If you escrow, please verify with your Mortgage Company that they have received this information. Otherwise, this is your tax bill. *

2024 DUPLICATE TAX STATEMENT

MAKE CHECKS PAYABLE TO:

GRAND LAKES MUD #2
 Catherine Wheeler, Tax A/C
 P. O. BOX 4383
 HOUSTON TX 77210

Orig. Billing Date	10/8/2024			
Delinquent Date	2/1/2025			
Jurisdiction Code	M121			
CAD No				
Billing Type				
If Paid	Penalty	Interest	Collection	Amount Due
In Oct 2024				
In Nov 2024				
In Dec 2024				
In Jan 2025				
In Feb 2025	6%	1%		
In Mar 2025	7%	2%		
Amount of Your Payment				

Exhibit 4

From: Wakileh, George <george.wakileh@gmail.com>
To: mike.mcclusky@gmail.com; jsvann@edge-es.com; ghenry@xpernet.com; brad.a.baker@outlook.com; don.butler@cbhou.com; m.mcclusky@grandlakesmud2.com; j.vann@grandlakesmud2.com; g.henry@grandlakesmud2.com; b.baker@grandlakesmud2.com; d.butler@grandlakesmud2.com
Cc: Joseph Schwartz <jschwartz@sphllp.com>; Mitchell Page <mepage@sphllp.com>; Melia Berry <mberry@sphllp.com>; Gordon Cranner <gcranner@sphllp.com>; Chris Skinner <cskinner@sphllp.com>; catherine.w@wheelerassoc.com; contactus@wheelerassoc.com
Date: Tuesday, February 3, 2026, 4:38 PM
Subject: GLMUD2: Formal request for the MUD's board members to take immediate corrective actions

Grand Lakes MUD No. 2

- MUD's Board members: Michael Christopher McClusky, J. Scot Vann, Gregory Jay Henry, Bradley Allen Baker, William Donald Butler

Copy: Schwartz, Page & Harding and Wheeler & Associates

**GLMUD2 - The April 21, 2025 resolution that sets a 20% penalty is illegitimate
Formal request for the MUD's board members to take immediate corrective actions**

Michael Christopher McClusky, J. Scot Vann, Gregory Jay Henry, Bradley Allen Baker, and William Donald Butler: Through my email of February 3, 2026 12:05 AM, you – acting as the MUD's five board members – became aware that the April 21, 2025 "Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes", orchestrated and executed by the corrupt, lawless, rotten Christopher Todd Skinner of Schwartz, Page & Harding, is illegitimate for unmistakable breach of Tax Code § 33.07(a). The resolution arbitrarily set the additional penalty to 20%, but that penalty cannot—per Tax Code § 33.07(a)—be greater than 15%; the delinquent tax attorney's compensation specified in the Tax Collection Agreement.

Without undue delay, you are required by law to:

1. Inform the MUD's taxpayers by posting a Notice on the MUD's website (<https://www.grandlakesmud2.com/>).
2. Order the MUD's tax collector, Wheeler & Associates, to correct each and every tax statement it issued in 2024, 2025, or 2026 that refers to and/or applies the 20% additional penalty. The 20% additional penalty must be removed from each and every tax statement Wheeler & Associates issued.
3. Order the MUD's tax collector, Wheeler & Associates, to remove from all tax statements any reference to the 20% additional penalty (*see* the attached tax statement and the text I encircled in red). Wheeler & Associates cannot apply a 15% additional penalty either, because there is no formal resolution that lawfully effectuates such a penalty.
4. Hold a meeting to nullify / void / invalidate the April 21, 2025 "Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes".

You are formally informed and you cannot invoke confusion or ignorance. Should you choose to not take immediate corrective actions, you—in your formal capacity as MUD's board members—become an integral part of a new suit and injunction for consciously refusing to remedy wrongdoing; for wilfully continuing to impose an illegitimate penalty; and for intentionally refusing to abide by the Tax Code.

This notification will be presented in court as evidence of informing the MUD's five board members and requesting them to act.

--

George J. Wakileh, Ph.D.
6819 Rosemont Park Ln
Katy, TX 77494-6590
george.wakileh@gmail.com

From: Wakileh, George <george.wakileh@gmail.com>
To: Joseph Schwartz <jschwartz@sphllp.com>; catherine.w@wheelerassoc.com;
Yolanda Humphrey <YHumphrey@pbfc.com>; mike.mcclusky@gmail.com; jsvann@edge-es.com;
ghenry@xpernet.com; brad.a.baker@outlook.com; don.butler@cbhou.com;
m.mcclusky@grandlakesmud2.com; j.vann@grandlakesmud2.com;
g.henry@grandlakesmud2.com; b.baker@grandlakesmud2.com; d.butler@grandlakesmud2.com
Cc: Mitchell Page <mepage@sphllp.com>; Melia Berry <mberry@sphllp.com>;
Gordon Cranner <gcranner@sphllp.com>; Chris Skinner <cskinner@sphllp.com>
Date: Tuesday, February 3, 2026, 12:05 AM
Subject: GLMUD2: The April 21, 2025 resolution that sets a 20% penalty is illegitimate

Grand Lakes MUD No. 2

- Board members: Michael Christopher McClusky, J. Scot Vann, Gregory Jay Henry, Bradley Allen Baker,
William Donald Butler

GLMUD2 – The April 21, 2025 resolution that sets a 20% penalty is illegitimate

Joseph M. Schwartz: Provisions 5(a) and (c) of the Tax Collection Agreement you signed on May 20, 2002 read:

(a) If a delinquent tax account is paid prior to the filing of suit, Attorneys shall be entitled to receive from the District fifteen percent (15%) of the taxes, penalties, and interest collected on such delinquent account as attorney's fees.

(c) For purposes only of calculating the Attorney's compensation under this paragraph, any additional penalty levied by the District pursuant to Section 33.07 of the Texas Property Tax Code and collected by Attorneys shall not be considered as "taxes, penalty or interest" and Attorneys shall not be entitled to receive fifteen percent (15%) of such amount.

Tax Code § 33.07(a) reads in part: "... The amount of the penalty may not exceed the amount of the compensation specified in the contract with the attorney to be paid in connection with the collection of the delinquent taxes."

The corrupt, lawless, and rotten [Christopher Todd Skinner](#) of [Schwartz, Page & Harding](#) orchestrated the April 21, 2025 "Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes", setting the additional penalty at 20%. This resolution is **illegitimate** as – per the preceding background – the penalty cannot be greater than 15%.

Grand Lakes MUD No. 2 board of directors must immediately nullify the April 21, 2025 "Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes" and order Wheeler & Associates to rectify all tax statements it issued in 2025, applying the 20% penalty to such statements.

The MUD's tax collector, Wheeler & Associates, must immediately correct each and every tax statement it issued in 2025, applying the 20% penalty to such statements.

Should the MUD, Schwartz Page & Harding, and Wheeler & Associates not take immediate actions as outlined above, you will all be sued in court for refusing to remedy wrongdoing and an illegitimate resolution.

--

George J. Wakileh, Ph.D.
6819 Rosemont Park Ln
Katy, TX 77494-6590
george.wakileh@gmail.com

From: Wakileh, George <george.wakileh@gmail.com>
To: catherine.w@wheelerassoc.com; contactus@wheelerassoc.com
Cc: mike.mcclusky@gmail.com; jsvann@edge-es.com; ghenry@xpernet.com; brad.a.baker@outlook.com; don.butler@cbhou.com; m.mcclusky@grandlakesmud2.com; j.vann@grandlakesmud2.com; g.henry@grandlakesmud2.com; b.baker@grandlakesmud2.com; d.butler@grandlakesmud2.com; Joseph Schwartz <jschwartz@sphllp.com>; Mitchell Page <mepage@sphllp.com>; Melia Berry <mberry@sphllp.com>; Gordon Cranner <gcranner@sphllp.com>; Chris Skinner <cskinner@sphllp.com>
Date: Tuesday, February 3, 2026, 4:32 PM
Subject: GLMUD2: Formal request for Wheeler & Associates to take immediate corrective actions

Wheeler & Associates, att: Catherine Wheeler
6935 Barney Road, Suite 110
Houston, Texas 77092
catherine.w@wheelerassoc.com
contactus@wheelerassoc.com

Copy

Grand Lakes MUD No. 2 and Schwartz, Page & Harding

- MUD's Board members: Michael Christopher McClusky, J. Scot Vann, Gregory Jay Henry, Bradley Allen Baker, William Donald Butler

**GLMUD2 – The April 21, 2025 resolution that sets a 20% penalty is illegitimate
Formal request for Wheeler & Associates to take immediate corrective actions**

Catherine Wheeler: Through my email of February 3, 2026 12:05 AM, Wheeler & Associates – which acts as the tax collector for Grand Lakes MUD No. 2 – became aware that the April 21, 2025 "Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes", orchestrated and executed by the corrupt, lawless, rotten Christopher Todd Skinner of Schwartz, Page & Harding, is illegitimate for unmistakable breach of Tax Code § 33.07(a). The resolution arbitrarily set the additional penalty to 20%, but that penalty cannot—per Tax Code § 33.07(a)—be greater than 15%; the delinquent tax attorney's compensation specified in the Tax Collection Agreement.

Without undue delay, the MUD's tax collector, Wheeler & Associates, must correct each and every tax statement it issued in 2024, 2025, or 2026 that refers to and/or applies the 20% additional penalty. The 20% additional penalty must be removed from each and every tax statement Wheeler & Associates issued. Wheeler & Associates must also remove from all tax statements any reference to the 20% additional penalty (see the attached tax statement and the text I encircled in red). Wheeler & Associates cannot apply a 15% additional penalty either, because there is no formal resolution that lawfully effectuates such a penalty.

You are formally informed and you cannot invoke confusion or ignorance. Should Wheeler & Associates not take immediate corrective actions, Wheeler & Associates becomes an integral part of a new suit and injunction for consciously refusing to remedy wrongdoing; for wilfully continuing to impose an illegitimate penalty; and for intentionally refusing to abide by the Tax Code.

This notification will be presented in court as evidence of informing Wheeler & Associates and requesting them to act.

--

George J. Wakileh, Ph.D.
6819 Rosemont Park Ln
Katy, TX 77494-6590
george.wakileh@gmail.com

Exhibit 5

List of 101 districts administered by Houston-based law firm of [Schwartz, Page & Harding](#).

Addicks Utility District, Harris County

Audubon Municipal Utility District 1, Montgomery County

Baker Road Municipal Utility District

Barker-Cypress Municipal Utility District, Harris County

Brazoria County Municipal Utility District No. 6, Brazoria County

Brazoria County Municipal Utility District No. 73, Brazoria County

Central Harris County Regional Water Authority | <https://www.chcrwa.com/>

Chambers County Improvement District No. 2, Chambers County

Chambers County Improvement District No. 3, Chambers County

Charleston Municipal Utility District, Fort Bend County

Fallbrook Utility District, Harris County

Fort Bend County Levee Improvement District No. 7, Fort Bend County

Fort Bend County Levee Improvement District No. 15, Fort Bend County

Fort Bend County Municipal Utility District No. 34, Fort Bend County

Fort Bend County Municipal Utility District No. 35, Fort Bend County

Fort Bend County Municipal Utility District No. 41, Fort Bend County

Fort Bend County Municipal Utility District No. 132, Fort Bend County

Fort Bend County Municipal Utility District No. 144, Fort Bend County

Fort Bend County Municipal Utility District 145 Rio Vista

Fort Bend County Municipal Utility District No. 215, Fort Bend County

Fort Bend County Municipal Utility District No. 216, Fort Bend County

Fort Bend County Municipal Utility District No. 220, Fort Bend County

Fort Bend County Municipal Utility District No. 229, Fort Bend County

Generation Park Management District, Harris County

Grand Lakes Municipal Utility District No. 1, Fort Bend County

Grand Lakes Municipal Utility District No. 2, Fort Bend County

Grand Lakes Municipal Utility District No. 4, Fort Bend County

Grand Lakes Water Control & Improvement District, Fort Bend County

Green Trails Municipal Utility District of Harris County

Harris County Municipal Utility District No. 26, Harris County

Harris County Municipal Utility District No. 70, Harris County

Harris County Municipal Utility District No. 96, Harris County

Harris County Water Control & Improvement District No. 109, Harris County

Harris County Water Control & Improvement District No. 149, Harris County

Harris County Water Control & Improvement District No. 159, Harris County

Harris County Water Control & Improvement District No. 166, Harris County

Harris County Water Control & Improvement District No. 183, Harris County

Harris County Municipal Utility District No. 200, Harris County

Harris County Municipal Utility District No. 215, Harris County

Harris County Municipal Utility District No. 239, Harris County

Harris County Municipal Utility District No. 249, Harris County

Harris County Municipal Utility District No. 257, Harris County

Harris County Municipal Utility District No. 276, Harris County

Harris County Municipal Utility District No. 280, Harris County

Harris County Municipal Utility District No. 281, Harris County

Harris County Municipal Utility District No. 282, Harris County

Harris County Municipal Utility District No. 284, Harris County

Harris County Municipal Utility District No. 341, Harris County

Harris County Municipal Utility District No. 342, Harris County

Harris County Municipal Utility District No. 344, Harris County

Harris County Municipal Utility District No. 345, Harris County

Harris County Municipal Utility District No. 360, Harris County

Harris County Municipal Utility District No. 370, Harris County
Harris County Municipal Utility District No. 387, Harris County
Harris County Municipal Utility District No. 389, Harris County
Harris County Municipal Utility District No. 390, Harris County
Harris County Municipal Utility District No. 400-East, Harris County
Harris County Municipal Utility District No. 400-West, Harris County
Harris County Municipal Utility District No. 418, Harris County
Harris County Municipal Utility District No. 419, Harris County
Harris County Municipal Utility District No. 434, Harris County
Harris County Municipal Utility District No. 489, Harris County
Harris County Municipal Utility District No. 490, Harris County
Harris County Municipal Utility District No. 494, Harris County
Harris County Municipal Utility District No. 536, Harris County
West Harris County Municipal Utility District No. 16

Harris-Fort Bend Counties Municipal Utility District No. 1
Harris-Fort Bend Counties Municipal Utility District No. 3
Harris-Fort Bend Counties Municipal Utility District No. 5, Harris & Fort Bend Counties
Harris-Montgomery Counties Municipal Utility District No. 386, Harris and Montgomery Counties
Harris-Montgomery Counties Municipal Utility District No. 386 May V, Harris-Montgomery Counties
Harris-Waller Counties Municipal Utility District No. 2, Harris and Waller Counties

Harris County Water Control and Improvement District No. 109, Harris County
Harris County Water Control and Improvement District No. 159, Harris County

Langham Creek Utility District
Longhorn Town Utility District

Montgomery County Municipal Utility District No. 36, Montgomery County
Montgomery County Municipal Utility District No. 94, Montgomery County
Montgomery County Municipal Utility District No. 95, Montgomery County
Montgomery County Municipal Utility District No. 96, Montgomery County
Montgomery County Municipal Utility District No. 98, Montgomery County
Montgomery County Municipal Utility District No. 119, Montgomery County
Montgomery County Municipal Utility District No. 126, Montgomery County
Montgomery County Municipal Utility District No. 128A, Montgomery County
Montgomery County Municipal Utility District No. 152A, Montgomery County

Morton Road Municipal Utility District
Northwest Freeway Municipal Utility District
Northwest Harris County Municipal Utility District 15
Northwest Harris County Municipal Utility District 32

Plantation Municipal Utility District

Rancho Isabella Municipal Utility District, Brazoria County
Remington Municipal Utility District 1
Ricewood Municipal Utility District
Rock Prairie Management District No. 2, Brazos County

Waller County Municipal Utility District No. 35, Waller County
Westador Municipal Utility District
Westlake Municipal Utility District No. 1, Harris County
Wood Trace Municipal Utility District No. 1, Montgomery County

The Woodlands Metro Center Municipal Utility District, Montgomery County
The Woodlands Township, Montgomery & Harris Counties
The Woodlands Road Utility District No. 1, Montgomery & Harris Counties

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 111922494

Filing Code Description: Petition

Filing Description: Original Petition and Application for Injunctive Relief

Status as of 3/3/2026 4:20 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
William Donald Butler , in his official capacity as board of directors officer		don.butler@cbhou.com	3/3/2026 10:06:00 AM	NOT SENT
Bradley Allen Baker , in his official capacity as board of directors officer		brad.a.baker@outlook.com	3/3/2026 10:06:00 AM	NOT SENT
Gregory Jay Henry , in his official capacity as board of directors officer		ghenry@xpernet.com	3/3/2026 10:06:00 AM	NOT SENT
J. Scot Vann , in his official capacity as board of directors officer		jsvann@edge-es.com	3/3/2026 10:06:00 AM	NOT SENT
Michael Christopher McClusky , in his official capacity as board of directors officer		mike.mcclusky@gmail.com	3/3/2026 10:06:00 AM	NOT SENT
George J.Wakileh		george.wakileh@gmail.com	3/3/2026 10:06:00 AM	NOT SENT