

NO. 25-DCV-331419

GRAND LAKES MUNICIPAL UTILITY DISTRICT # 2,	§	IN THE DISTRICT COURT OF
<i>Plaintiff,</i>	§	
v.	§	FORT BEND COUNTY, TEXAS
GEORGE J. WAKILEH,	§	
<i>Defendant.</i>	§	268TH JUDICIAL DISTRICT

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I. INTRODUCTION

(1) This filing carries the defendant’s Answer to the Original Petition filed the plaintiff on July 2, 2025. The original petition was served by the county’s Constable – Precinct 1 on September 10, 2025.

(2) Throughout this suit, [Grand Lakes Municipal Utility District # 2](#),¹ the plaintiff or taxing unit, could be referred to as the “MUD”. Defendant is a resident/ratepayer served by the MUD since January 2008.

(3) Via this Answer and this suit, defendant will show that: (i) The MUD cannot be governed by a lawless, corrupt attorney; a monstrous tyrant. (ii) The MUD’s attorney cannot act on his own; he cannot act on behalf of the MUD; he cannot sign on behalf of the MUD; and he cannot bind the MUD. (iii) The MUD’s board members’ actions cannot be subjective, arbitrary, abusive, or discriminatory; their actions must be consistent, fair, and lawful. (iv) The MUD’s actions and resolutions must be taken in open meetings. (v) The MUD’s governance does not become lawful just because incompetent, compromised, sleepy, and/or indifferent board members approve of the MUD’s attorney’s deceptive, fraudulent, unlawful actions. (vi) With the MUD being administered by a gang of corrupt, lawless, ruthless consultants (law firm, water company, engineering firm, accounting firm, financial advisor, tax collector,

¹ <https://www.grandlakesmud2.com/>

delinquent tax attorney, etc), the MUD’s governance is dubious at best. (vii) This suit is not only malicious and evil; it is also illegitimate for being grounded on enormous violations in breach of the Government Code (Open Meetings Act and Public Information Act), Tax Code, and possibly other codes.

II. BACKGROUND

(4) The Grand Lakes neighborhood, in Katy / Fort Bend County / Texas, hosts three municipal utility districts (MUDs) and one water control and improvement district (WCID). The land (in acres) and customers (residences and commercial entities) served by each MUD are summarized below.

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

(5) All three MUDs and the WCID are administered by a lawless, deeply-corrupt attorney; [Christopher Todd Skinner](#)² of Houston-based law firm of [Schwartz, Page & Harding](#)³ (“SPH”). Skinner has for over 20 years been tampering with the finances of the four entities (over \$400 million). Skinner started from 2022 to inflate the expenses for MUD No. 2—the smallest MUD—and target it with the highest expenses after said MUD managed to pay off its debt through the Strategic Partnership Agreement with the City of Houston. To secure an everlasting job for himself and the law firm he works at, Skinner’s unmistakable agenda is to deplete the MUD’s funds and move it through new bonds into endless debt and interest. And who is the bond manager? It is Skinner himself; the individual who is hired and paid to advise the MUD on legal matters. Instead, he works actively on defrauding the MUD and ratepayers. Skinner’s illegal violations—financial and other—cause harm to some 2,740 residences and 40 commercial entities in the Grand Lakes neighborhood.

(6) Skinner has since 2024 put the MUD in indefinite litigation besides resulting in over 20 complaints to the Office of the Attorney General (“OAG”) for blocking the release of public information that is fundamental to the clean, transparent, lawful governance of the MUD. Without a valid or legitimate contract, and through the MUD’s funds and ratepayer money, Skinner hired Austin-based law firm of [Lloyd Gosselink Rochelle & Townsend](#) (“LGRT”) to cover up fraud, tampering, and violations of his own, conscious, intimate making. Skinner hired LGRT to represent the MUD in cause no. D-1-GN-24-006054 before the Travis County 201st District Court (processed by the Travis County 459th District Court) and cause no. D-1-GN-24-010136 before the Travis County 345th District Court against the Texas Office of the Attorney General. The first cause is an administrative appeal resulting from a fraudulent rate order (that increases ratepayer water bills by 200% to 450%) Skinner orchestrated and enacted from February 1, 2024. The second cause is meant to prevent the disclosure of LGRT’s invoices to the MUD despite OAG’s decision [OR-2024-040867](#) (December 6, 2024) ordering that the invoices be released as public information. Between July 2024 and April 2025, the MUD’s financial reports show seven payments (a total of \$204,121) made to LGRT as “Legal Fees – PUC Appeal”. Concurrently, SPH invoiced and was paid \$179,275. During the period, the two law firms got paid \$383,396. Skinner has since then denied the defendant access to all information the MUD possesses, controls, or has a right of access to. This resulted in over 20 complaints filed with the OAG; many of which are pending.

(7) Ongoing since September 9, 2024 / December 20, 2024, the defendant serves as the resident’s representative in the first cause (D-1-GN-24-006054) and as an intervener in the second cause (D-1-

2 https://www.sphllp.com/_chris_skinner.html

3 <https://www.sphllp.com/>

GN-24-010136). As the defendant became active in uncovering, documenting, and reporting Skinners' violations, the latter started a despicable, reprehensible retribution campaign against the defendant.

(8) *First*, Skinner coordinated with the MUD's board members (Michael Christopher McClusky, J. Scot Vann, Gregory Jay Henry, Bradley Allen Baker, and William Butler) and [Charlie Chapline](#)⁴ of [Municipal District Services](#)⁵—the MUD's water company, and instituted against the defendant two dubious civil penalties in the amount of \$400.

(9) *Second*, Skinner and Chapline then removed the water meter at defendant's property on June 18, 2024, but continued to send monthly water bills for one full year; each in the amount of \$49.50 (\$45 plus 10% in fees). Even though they removed the water meter and left the property with no water service since June 18, 2024, they fraudulently added \$300 to the water bill: \$150 in reconnection fee and \$150 in deposit. The May 2025 bill was for \$1058.10, which, in June 2025, they corrected down to \$401.10. Defendant's property continues to be without water since June 18, 2024.

(10) *Third*, Skinner went on to make the MUD's board adopt dubious resolutions that would empower his lawless, punishable agenda—a December 16, 2024 resolution: "limiting the time allocated to producing public information" and an April 21, 2025 resolution: "additional penalty on delinquent real property taxes". The two resolutions were never formally communicated to the ratepayers or published on the [MUD's website](#).⁶ Skinner would then use the first resolution to deny access to the MUD's information and the second one to unlawfully and retroactively impose penalties on previous-years' property taxes.

(11) *Fourth*, through further lawlessness, Skinner should have instructed Catherine Wheeler, the MUD's tax collector at [Wheeler & Associates](#),⁷ to not cash defendant's checks. The checks are a gesture of goodwill despite the MUD removing the water meter at defendant's property since June 18, 2024. Skinner's obvious, evil, and illegal intention is to impose on the defendant enormous amounts in interest and fees.

Check number	Transaction	Amount	Sent on
874267537	23483290138	\$195.46	01/24/2025
896739652	25986016421	\$423.31	08/26/2025
898295302	26184662767	\$423.31	09/11/2025

\$195.46 = $169/366 \times \$423.31$ = because of meter removal.
\$423.31 is the full amount of the 2024 tax statement.

(12) *Fifth*, Skinner followed by hindering defendant's access to the MUD's information since May 2025. Keeping the defendant in the dark is key in helping Skinner to succeed.

(13) *Sixth*, Skinner concluded by instructing the MUD's delinquent tax attorney—[Perdue Brandon Fielder Collins and Mott](#)—to file the instant suit on July 2, 2025. Testimonies by the board members and MUD's consultants as well as the discovery process will reveal that Skinner acted in bad faith, wrongfully, and illegally with knowledge, will, and deliberate intent.

(14) There is much more that can only be uncovered through a thorough criminal investigation. In any case, we will further detail the aforementioned violations through the discovery process, testimonies (see Part VI below) and at trial.

4 <https://mdswater.com/meet-the-team/>

5 <https://mdswater.com/>

6 <https://www.grandlakesmud2.com/>

7 <https://wheelerassoc.com/>

III. DEFENSES

(15) We emphasize anew that, on June 18, 2024, the MUD removed the water meter at defendant's property. They left the property with no water since then. Despite this devilish evil deed, the defendant paid the MUD three times (see paragraph (11) above), but the three checks were not cashed through lawless, punishable coordination between the MUD's attorney and the tax collector. They are after a devilish evil agenda; thinking that—through interest and fees—they can grow the \$423.31 amount to many thousands.

(16) Pursuant to Texas Rule of Civil Procedure 94, defendant will—at trial—show that plaintiff's claims are barred by the defense of:

A. Contributory Negligence

(17) Plaintiff's own actions caused the harm plaintiff alleges against the defendant.

B. Duress

(18) In not paying the full amount of the 2024 tax statement, the defendant did not act out of own free will. The defendant was indirectly coerced into not paying the tax statement because the plaintiff refused to offer the services (water/wastewater, trash collection) it is paid to offer. In denying the defendant water service since June 18, 2024, plaintiff's harm to the defendant is imminent and serious, leaving the defendant with no alternative but to refuse to pay the plaintiff money it is not entitled to for not delivering to the defendant the services it is obliged to deliver.

C. Assumption of Risk

(19) Defendant's letter of April 6, 2025 to the MUD and tax collector (Wheeler & Associates) proves that the plaintiff was aware of the danger of their own actions of removing the water meter at defendant's property since June 18, 2024. The plaintiff chose to ignore defendant's requests to correct; continued denial and defiance; and finally instituted this lawsuit. Plaintiff's actions absolve the defendant of any liability. The plaintiff is responsible for the harm caused by and resulting from their own actions.

D. Failure of Consideration

(20) The annual property tax collected by the MUD Tax is in exchange for services the MUD must deliver to the ratepayers. When the MUD does not fulfill its obligations, the ratepayer is no longer required to pay the MUD the annual property tax it seeks/claims. By removing the water meter at defendant's property since June 18, 2024 and keeping the property with no water from then through the present, the MUD did not fulfill its obligations; did not deliver its services; and is not entitled to any claims against the defendant.

E. Injury to Fellow Servant

(21) The defendant is not responsible for injury to plaintiff MUD. Plaintiff MUD is injured due to the reckless, evil, malicious actions of its attorney—[Christopher Todd Skinner](#) of Houston-based law firm of [Schwartz, Page & Harding](#)—who wants to retaliate against the defendant for uncovering, documenting, and reporting many of the attorney's illegal violations.

F. Laches

(22) The plaintiff could have brought this suit on February 2, 2025 (the delinquency date), but delayed enforcing their alleged rights and delayed the suit. Why? The MUD's attorney wanted to advance a malicious resolution, which he did on April 21, 2025 “Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes”. By filing on July 2, 2025, the MUD's attorney delayed the suit even further because he wanted to maximize the amount due by adding to it a 20% collection fee. In result, this suit advances the MUD's attorney's sickening, illegal agenda of retribution against a ratepayer who exposed said attorney's many violations.

G. Illegal Retribution

(23) The delinquent collection listings presented by the MUD’s tax collector at the MUD’s board meeting of May 19, 2025 prove the MUD’s attorney’s reprehensible, despicable, evil, illegal act of retribution against the defendant. Of 11 personal property delinquent accounts and 26 real property delinquent accounts for some \$30,750 with delinquency instances spreading over multiple years and dating back to 2018, only the defendant was pricked to be sued. Who took the decision to sue, when, and how? The discovery process and testimonies will uncover a lot of lawlessness. No matter what, and regardless if the decision to sue came from the MUD’s attorney with or without the board’s approval, the MUD, its board, its attorney, and its consultants must be held accountable. They cannot pick and choose; they have to abide by the law; they have to be decent, fair, objective, and consistent.

Delinquent collection listing by the MUD’s tax collector as of 4/30/2025
Presented at the MUD’s board meeting of May 19, 2025

Personal property – 11 delinquent accounts for a total of \$1,688.98			Real property – 26 delinquent accounts for a total of \$29,052.72		
CAD no.	Years	Total due	CAD no.	Years	Total due
9960012210017914	2021	\$154.93	3529010010060914	2022-2023	\$1,145.05
9960032180117914	2023-2024	\$26.43	3529010010150914	2024	\$911.36
9960042240036914	2024	\$100.52	3529020010060914	2023	\$35.00
9960172190011914	2020	\$94.55	3529030020030914	2020	\$894.64
9960182090091914	2023-2024	\$15.28	3529030020410914	2024	\$734.82
9960192180236914	2019	\$146.66	3529050010190914	2024	\$925.57
9960192190162914	2021-2024	\$449.74	3532010010040914	2024	\$823.47
9960212230021914	2023-2024	\$687.24	3532010010050914	2024	\$699.43
9963072240121914	2024	\$4.26	3532010010100914	2024	\$1,069.03
9963182110003914	2024	\$5.73	3532010010290914	2024	\$747.34
9963202220005914	2024	\$3.64	3532010010310914	2024	\$843.58
			3532020010120914	2024	\$945.02
			3532020010230914	2018-2024	\$7,520.62
			3532020010240914	2024	\$1,349.56
			3532030020140914	2024	\$1,307.85
			3532030030090914	2024	\$645.71
			3532040030010914	2024	\$1,028.29
			3532040030110914	2024	\$878.11
			3532050020090914	2024	\$915.45
			3532050020150914	2024	\$800.55
			3532050030040914	2024	\$886.03
			3532050030300914	2024	\$811.08
			3532050030500914	2024	\$1,225.82
			3532060010080914	2024	\$985.53
			3532070010160914	2024	\$469.87
			3532070010330914	2024	\$453.94
Total		\$1,688.98	Total		\$29,052.72

(24) Through its tax collector, the defendant asks the MUD to produce all delinquent tax rolls from February 1, 2025 and prove to the court why only one taxpayer – with a minimal amount of delinquent tax and for 2024 only – was sued when the roll includes many other delinquent accounts, some for several years. The answer is simple—retribution against a taxpayer who has been uncovering the MUD’s attorney’s endless, intimately-orchestrated violations that warrant a criminal investigation.

H. Illegality

(25) Defendant will—at trial—show that plaintiff is not entitled to filing this suit, that is illegitimate at best.

(26) The MUD must not be allowed to benefit from penalty, interest, and collection fees that are illegal, for being based on invalid, illegitimate tax statement and resolutions.

1. Illegality of the September 16, 2024 resolution and 2024 tax statement

(27) Plaintiff cannot sue for payment of a 2024 tax statement that is based on numerous violations of the law, making it illegal, unenforceable, and void.

(28) *First*, the defendant has evidence—emails dated August 8/9, 2024; much more will be uncovered through the discovery process and witness testimonies—of illegal coordination between/among the MUD’s attorney and MUD’s consultants (financial advisor Masterson Advisors, tax collector Wheeler & Associates, and bookkeeper Municipal Accounts & Consulting) with ex parte communication with the president of the MUD’s board (Michael Christopher McClusky) ahead of the MUD’s board meeting of August 19, 2024. Through this, the floor was already set for imposing a 2024 tax rate of 0.134542%; the highest possible tax rate allowed by the law using increment, and six steps above the parity rate.

(29) *Second*, posted on October 8, 2024, the 2024 tax statement already talked about a 20% penalty imposed from July 1, 2025 while the MUD did not adopt and publish a formal resolution on that until April 21, 2025 (see III.H.3 below).

(30) *Third*, in the MUD’s board meeting of September 16, 2024 (see the corresponding [minutes](#)⁸ which did not become available to the ratepayers until late October 2024 – early November 2024, after being approved in the October 21, 2024 board meeting), an Order on Levying Taxes was passed and adopted to levy the 0.134542% tax for the 2024 tax year. To conceal information from the ratepayers, the MUD’s attorney published the MUD’s board meeting minutes—which are useless anyway—without any exhibits (reports, resolutions, etc). As such, the September 16, 2024 Order on Levying Taxes was never formally communicated to the ratepayers or published on the MUD’s website. After having received a copy of the order through a Public Information request, the signature of Gregory Jay Henry, the secretary of the MUD’s board, on said order seems to be forged. We will present over a dozen images of Henry’s signature and show that there are multiple instances of his signature being forged; likely by someone at [Schwartz, Page & Harding](#) (Skinner or others).

(31) *Fourth*, there is ambiguity and uncertainty surrounding the MUD’s Notice of Public Hearing on Tax Rate and the MUD’s compliance with all requirements of Tax Code § 26.06. The MUD did not comply with § 26.06(a) that requires the MUD to hold the hearing in a publicly owned building inside its boundaries. The MUD’s tax collector claims to have published the notice in a newspaper. Before the court, the MUD must present evidence of the date of publication of the notice in a newspaper. The evidence must be in the form of a full physical genuine copy of the newspaper showing all pages, the newspaper’s name, date, and the notice in its entirety.

(32) *Fifth*, through testimony and discovery, the defendant will challenge the MUD’s board members, MUD’s attorney, and MUD’s tax collector, and other consultants as necessary on compliance with every aspect of the Tax Code.

2. The MUD brought the suit without a resolution adopted in an open meeting

(33) The MUD cannot bring a suit without a specific resolution to sue adopted in an open meeting. And, the MUD's officers could not in a board meeting discuss and adopt such a resolution if the matter was not

⁸ https://www.grandlakesmud2.com/static/d947f67cf212e2ca4eaa777bcfc59158/09_16_24_Approved_Minutes_GL_MUD_2_47770edaef.pdf

an item on the agenda for said meeting; Texas Government Code §§ 551.041, 551.042, 551.043. The instant suit was not an item on the agenda for the MUD's board meetings of [March 17](#),⁹ [April 21](#),¹⁰ [May 19](#),¹¹ or [June 16, 2025](#).¹² Then, even if a resolution to sue was adopted in the MUD's board meeting for June 16, 2025, the suit could not be brought before the district court until the [June 16, 2025 board meeting minutes](#)¹³ get approved in the next monthly board meeting (July 21, 2025). A July 2, 2025 filing of this suit is, as such, improper, unlawful, and invalid because the board meeting minutes are prepared by the MUD's attorney and the MUD's board had not yet reviewed and approved said minutes.

3. The April 21, 2025 “Resolution on Additional Penalty On Delinquent Property Taxes” is illegal

(34) The April 21, 2025 “Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes” is unlawful and invalid because:

(35) *First*, said resolution was added by the MUD's attorney to the [Agenda](#)¹⁴ (Item no. 7) for the MUD's [April 21, 2025 board meeting](#). Said agenda is normally published on the MUD's website 72 hours ahead of the MUD's monthly meeting, on Friday before the Monday meeting. The MUD's attorney has no power or authority to add any item to the MUD's monthly meeting agenda. Page 6 of the MUD's [March 17, 2025 board meeting minutes](#)¹⁵ reads: “FUTURE AGENDA ITEMS: The Board considered matters to be placed on future Board meeting agendas and noted that there were no additional items other than the items set forth hereinabove.” As such, the MUD's board did not decide to add anything to the agenda for the next monthly meeting (April 21, 2025), but the MUD's attorney added an item “Resolution Authorizing An Additional Penalty On Delinquent Real Property Taxes” to the agenda for the MUD's April 21, 2025 board meeting and published said agenda on the MUD's website on or about April 18, 2025.

(36) *Second*, said resolution was never formally communicated to the MUD's ratepayers; it was never published on the MUD's website; cf. Texas Government Code §§ 551.1283 and 2051.202 regarding a MUD with a population of 500 or more.

(37) *Third*, [minutes](#)¹⁶ of the April 21, 2025 board meeting were not published on the MUD's website until May 27, 2025 afternoon, after said minutes had been approved in the May 19, 2025 board meeting. The 8-page minutes are published without the exhibits; something that the MUD's attorney has consciously been doing for years with the sole purpose of concealing important information from the ratepayers. In result, the April 21, 2025 resolution was never officially communicated to the MUD's ratepayers.

(38) *Fourth*, a resolution that was passed and adopted on April 21, 2025 cannot have retroactive effects and cannot apply to 2024 tax dues. It certainly cannot apply to any account that became delinquent before April 21, 2025 (in the instant case on February 1, 2025).

9 https://www.grandlakesmud2.com/static/9a3f14770878f27f48d53e57156bbf44/03_17_25_Agenda_GL_MUD_2_4f79c08be3.pdf

10 https://www.grandlakesmud2.com/static/0d3897dfa14bcebeddbb6376ab6826a9/04_21_25_Agenda_GL_MUD_2_c32cffb9d6.pdf

11 https://www.grandlakesmud2.com/static/ed6eb32c1019fdd3daddf1129660d80e/05_19_25_Amended_Agenda_GL_MUD_2_1_d4ee830f58.pdf

12 https://www.grandlakesmud2.com/static/2f695ff517cb2da9f05bf058a022bf6b/06_16_25_Agenda_GL_MUD_2_5d5f5f1067.pdf

13 https://www.grandlakesmud2.com/static/d88cfa1923a783aba5273709ce444d65/06_16_25_Approved_Minutes_GL_MUD_2_1_150b4c6c80.pdf

14 https://www.grandlakesmud2.com/static/0d3897dfa14bcebeddbb6376ab6826a9/04_21_25_Agenda_GL_MUD_2_c32cffb9d6.pdf

15 https://www.grandlakesmud2.com/static/1ba681a47bbb3cd72ee7e58f797e2f32/03_17_25_Approved_Minutes_GL_MUD_2_456bec4a30.pdf

16 https://www.grandlakesmud2.com/static/b822e8ac1d391d5c5a836b8146e348cd/Minutes_April_4_2025_amended_18bd95184e.pdf

4. The petition is illegitimate under Texas Tax Code § 33.43

(39) The petition is illegitimate under Texas Tax Code § 33.43. The MUD is not entitled to a personal judgment for all taxes, penalties, interest, and costs. Nor is the MUD entitled to a foreclosure of the tax lien and all subsequent steps.

(40) *First*, the tax is not legally imposed when the MUD did not serve the property with water since June 18, 2024 through the present.

(41) *Second*, the penalties, interest, and costs authorized by law are not due and the MUD is not entitled to recover penalty and interest, because the tax collector refused to cash the \$195.46 amount, which is a fair compensation for the partial service the MUD provided in 2024. Via transaction number 23483290138 / check number 874267537, the defendant/taxpayer paid the tax before the February 1, 2025 delinquency date and stated that \$195.46 is paid because the MUD disconnected the water meter at the property on June 18, 2024, thus serving the property with water for 169 out of 366 days ($169/366 \times \$423.31 = \195.46). The tax collector refused to cash the \$195.46 amount for 90 days, when the bank reinstated the amount into the defendant's bank account.

(42) *Third*, adding to the previous point, the MUD's tax collector refused and continues to refuse to cash checks (no. 896739652 sent on August 26, 2025 / no. 898295302 sent on November 11, 2025) in the amount of \$423.31 (full amount of the 2024 property tax statement). This lawlessness must not be underestimated.

(43) *Fourth*, all things required by law to be done have not been done properly by the appropriate officials—compliance with the Tax Code; compliance with the Open Meetings Act and discussion of items that are placed on the board meeting's agenda and announced in advance; the Notice of Public Hearing and announcement/publication requirements; the Public Hearing and compliance with the Tax Code; the September 16, 2024 Order on Levying Taxes; the tax statement dated October 8, 2024; the April 21, 2025 Resolution on Additional Penalty; and the authorization to file suit.

(44) *Fifth*, for the attorney signing the petition to prove legal authority to prosecute the suit on behalf of the MUD, said attorney must produce: (i) the MUD's contract with [Perdue Brandon Fielder Collins and Mott](#) ("PBFCM") for collection of delinquent taxes. (ii) A formal resolution authorizing the filing of the instant suit. The resolution must be dated, signed by the MUD's president of the board, attested by the MUD's secretary of the board, stamped by the MUD's seal, and documented in approved minutes of an open, monthly meeting of the MUD's board. This can be seen in the text of Item No. 6 on the [Agenda for the MUD's April 21, 2025 board meeting](#),¹⁷ which reads: "Review of Delinquent Tax Collection Attorneys' Report from Perdue, Brandon, Fielder, Collins & Mott, L.L.P.; authorize any action necessary and appropriate in connection therewith, including authorizing foreclosure proceedings, installment agreements, and the filing of proofs of claim."

IV. INITIAL DISCLOSURES

(45) Plaintiff must comply with the Duty to Disclose as defined in Texas Rules of Civil Procedure 194.1. Plaintiff must within 30 days after the filing of the first answer disclose to the defendant all information and material described in Rule 194.2, 194.3, and 194.4. The disclosed material must include but not be limited to:

- All email correspondence between/among the MUD's attorney, MUD's consultants, MUD's board members, and [Perdue Brandon Fielder Collins and Mott](#) regarding the filing of the instant suit.

¹⁷ https://www.grandlakesmud2.com/static/0d3897dfa14bcebeddbb6376ab6826a9/04_21_25_Agenda_GL_MUD_2_c32cffb9d6.pdf

- All board meeting agendas and minutes in which the instant suit was discussed.
- All resolutions based on which the instant suit was discussed.
- All resolutions that the MUD alleges to base its monetary claims on.
- All email correspondence between/among the MUD's attorney, MUD's consultants, and MUD's board members regarding the 2024 tax rate; before and after the tax rate was adopted on September 16, 2024.
- Calculations and spreadsheets by the MUD's consultants that resulted in the 2024 tax rate.
- All communications regarding such calculations and spreadsheets.
- All board meeting agendas and minutes in which the 2024 tax rate was discussed.
- A full physical newspaper copy showing the newspaper's name, date, and announcement to the MUD's ratepayers regarding the 2024 tax rate.
- All board meeting agendas and minutes in which the September 16, 2024 resolution was discussed.
- All board meeting agendas and minutes in which the April 21, 2025 order was discussed.
- With each and every resolution or order, the MUD must produce documentary evidence of how, when, and where it communicated said resolution/order to the ratepayers.
- Monthly property tax delinquency lists from February 1, 2025 through trial date, as issued by the MUD's Tax Collector, [Wheeler & Associates, Inc.](#), shared with the MUD's attorney, [Schwartz, Page & Harding](#), and added as Exhibits to the MUD's board meeting minutes. It must be emphasized that the MUD's attorney publishes on the [MUD's website](#) the board meeting minutes but not the corresponding exhibits (reports, contracts, resolutions, orders, etc).
- Of the 37 delinquent accounts listed under III.G (paragraph (23)), the MUD must produce all details (including the corresponding resolutions) regarding the delinquency suits it filed with the court.
- The email address for MUD's board member William Butler. Butler's email address is needed for said individual (i) to be served electronically with all pleadings in the case via the court's filing system; and (ii) to be called to testify in court. Email addresses for the other four board members became available to the defendant through cause no. D-1-GN-24-006054 before the Travis County 201st District Court (processed by the Travis County 459th District Court).

(46) If any of the issues related to this suit were discussed during the board's closed sessions with the MUD's attorney (Government Code § [551.071](#)), the MUD is obliged to disclose and produce all relevant material. The closed sessions do not justify wrongdoing and are not waived from discovery. The MUD is further reminded that it is required to keep comprehensive records of such closed sessions.

(47) The defendant warns the MUD and its actors about invoking attorney-client privilege for the sole purpose of hindering discovery and circumventing the law. Unlawful actions by the MUD's attorney, consultants, and board members are not protected under attorney-client privilege. Attorney-client privilege relates to the MUD's board members seeking genuine legal advice regarding a MUD-related issue. Neither SPH nor PBFCM represents any of the MUD's consultants. And PBFCM does not

represent SPH or anyone there. As such, the MUD and its actors are asked to be forthcoming and prompt in complying with the law regarding initial disclosures and discovery.

(48) The defendant warns the MUD and its actors about *playing reprehensible games* in reference to discovery. The defendant will request the toughest sanctions to be imposed on those who work on hindering discovery and circumventing the law.

(49) The defendant will follow up with more discovery requests after the MUD complies with the initial disclosures.

V. TRIAL BY JURY

(50) The defendant herein requests a jury trial and will deposit the jury fee with the court's clerk, pursuant to Rule 216 of the [Texas Rules of Civil Procedure](#).

VI. PERSONS TO TESTIFY AT TRIAL, BEFORE THE JURY

(51) Because of enormous unlawful coordination and wrongdoing, the defendant requires that the following individuals—at a minimum—appear in court and testify at trial before the jury. Defendant reserves the right to call other witnesses based on plaintiff's disclosures and the findings from discovery.

Grand Lakes Municipal Utility District No. 2 – Board of Directors

- Michael Christopher McClusky, President	mike.mcclusky@gmail.com
- J. Scot Vann, Vice President	jsvann@edge-es.com
- Gregory Jay Henry, Secretary	ghenry@xpernet.com
- Bradley Allen Baker, Assistant Secretary	brad.a.baker@outlook.com
- William Butler, Director	email address not available; MUD to provide

MUD's Attorney: Schwartz, Page & Harding, LLP

- Joseph Schwartz, Managing Partner	jschwartz@sphllp.com
- Mitchell Page, Founding Partner	mgschwartz@sphllp.com
- Christopher Todd Skinner	cskinner@sphllp.com
- Gordon Christopher Cranner	gcranner@sphllp.com
- Melia Berry	mberry@sphllp.com

MUD's Tax Collector: Wheeler & Associates, Inc.

- Catherine Wheeler	catherine.w@wheelerassoc.com
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MUD's Financial Advisor: Masterson Advisors LLC

- Debbie Shelton	Debbie.Shelton@mastersonadvisors.com
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MUD's Operator / Water Company: Municipal District Services, LLC

- Charlie Chapline	CChapline@mdswater.com
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MUD's Bookkeeper: Municipal Accounts & Consulting, LP

- Taylor Watson	TWatson@municipalaccounts.com
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VII. MOTION TO STRIKE FROM THE RECORD

(52) By order and without a hearing, the court strikes from the record the September 2, 2025 filing (Disclaimer of Impleaded Taxing Unit) made by Linebarger Goggan Blair & Sampson on behalf of Fort Bend County, Katy Independent School Interest, Fort Bend County Drainage District, Harris – Fort Bend Emergency Service District # 100, and Fort Bend County General Fund. None of the five taxing units is party (or made party) to this case. None of the five taxing units has been served with the original petition

and a citation. The defendant does not owe and has never owed any of the five taxing units any penny. None of the five taxing units has ever had any claims against the defendant. None of the five taxing units can have any claims against the defendant.

(53) For the foregoing reasons, the defendant will not serve this answer, motion, or any other pleading on said entities or their attorney.

VIII. PRAYER

(54) By order and without a hearing, the court strikes from the record the September 2, 2025 filing (Disclaimer of Impleaded Taxing Unit) made by Linebarger Goggan Blair & Sampson on behalf of Fort Bend County, Katy Independent School Interest, Fort Bend County Drainage District, Harris – Fort Bend Emergency Service District # 100, and Fort Bend County General Fund. None of the five taxing units is party (or made party) to this case. None of the five taxing units has been served with the original petition and a citation. The defendant does not owe and has never owed any of the five taxing units any penny. None of the five taxing units has ever had any claims against the defendant. None of the five taxing units can have any claims against the defendant.

(55) The court orders that the MUD promptly provide the email address for William Butler; one of the MUD's five board members. Butler's email address is needed for said individual (i) to be served electronically with all pleadings in the case via the court's filing system; and (ii) to be called to testify in court.

(56) Upon final hearing, the defendant prays that:

a. The plaintiff take nothing by their malicious-at-best suit.

b. The court deliver a judgment against the plaintiff; declare illegitimate and invalid the Notice of Public Hearing, the Public Hearing, the September 16, 2024 Order on Levying Taxes, the tax statement dated October 8, 2024, the April 21, 2025 Resolution on Additional Penalty, and the instant suit; and order the plaintiff to pay the defendant's fees and costs of court.

c. The court order the plaintiff and its individual actors (MUD's attorney, different consultants, and five board members) to pay civil penalties for unlawful coordination between and among themselves; for bringing a meritless suit as a retribution against a ratepayer who has been challenging said individuals' involvement in punishable wrongdoing.

d. The court grant such other and further relief to which the defendant is justly entitled.

Katy, Texas, on the 6th day of October 2025.

Respectfully submitted,

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

xxxx xxxxxxxx xxxx xx

xxxxx xx xxxxxxxxxx

george.wakileh@gmail.com

CERTIFICATE OF SERVICE

I certify that this pleading is notified on October 6, 2025, via the court’s electronic filing system, to all parties of record in the case.

Grand Lakes Municipal Utility District No. 2 – Board of Directors

- Michael Christopher McClusky, President mike.mcclusky@gmail.com
- J. Scot Vann, Vice President jsvann@edge-es.com
- Gregory Jay Henry, Secretary ghenry@xpernet.com
- Bradley Allen Baker, Assistant Secretary brad.a.baker@outlook.com
- William Butler, Director email address not available; MUD to provide

MUD’s Attorney: Schwartz, Page & Harding, LLP

- Joseph Schwartz, Managing Partner jschwartz@sphllp.com
- Mitchell Page, Founding Partner mepage@sphllp.com
- Christopher Todd Skinner cskinner@sphllp.com
- Gordon Christopher Cranner gcranner@sphllp.com
- Melia Berry mberry@sphllp.com

MUD’s Tax Collector: Wheeler & Associates, Inc.

- Catherine Wheeler catherine.w@wheelerassoc.com

MUD’s Financial Advisor: Masterson Advisors LLC

- Debbie Shelton Debbie.Shelton@mastersonadvisors.com

MUD’s Operator / Water Company: Municipal District Services, LLC

- Charlie Chapline CChapline@mdswater.com

MUD’s Bookkeeper: Municipal Accounts & Consulting, LP

- Taylor Watson TWatson@municipalaccounts.com

Perdue Brandon Fielder Collins and Mott, LLP

- Yolanda M. Humphrey YHumphrey@pbfc.com

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

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.

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Filing Description: Defendant's Original Answer

Status as of 10/6/2025 1:22 PM CST

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