



MEMORANDUM

TO: Board of Directors ("Board") of Grand Lakes Municipal Utility District No. 2 (the "District")

FROM: Schwartz, Page & Harding, L.L.P. ("SPH")

DATE: June 15, 2026

RE: History of correspondence with, accusations from, and litigation against District constituent George J. Wakileh ("Wakileh")

This memorandum is intended to provide a summary of the District, the Board, and SPH's history with Wakileh. This memorandum includes historical information regarding communications with, litigation against, and accusations made by Wakileh. This memorandum lists the various allegations made by Wakileh as they appear in documents, but many are repeated ad nauseum throughout the correspondence and legal filings, so are not repeated in each section.

I. BACKGROUND

Wakileh purchased the house located at 6819 Rosemont Park Lane, Katy Texas 77494, from Trendmaker Homes, Inc., the original developer of Grand Lakes, on January 25, 2008. At the time, Wakileh appears to have been married, and the General Warranty Deed from Trendmaker was granted to "GEORGE J. WAKILEH, A MARRIED PERSON". Publicly available records indicate Wakileh was subsequently divorced.

II. FIRST COMMUNICATIONS

- 1) **Communications.** The District's operator received a request from Wakileh prior in June 2021 requesting reimbursement of sanitary sewer fees for the preceding 36 months, stating that no one had lived in the home during that time. The Board considered and denied the request at its June 29, 2021 meeting. The first series of communications from Wakileh were received by SPH and director Greg Henry from July 8, 2021 through August 13, 2021 (the "Initial Communications"). In the Initial Communications, Wakileh requested that the District refund the sanitary sewer fees charged to his property for months when the water usage was zero, and amend the District's Rate Order. SPH responded to his requests, which responses are included in the Initial Communications, explaining the Rate Order. Wakileh included a letter to the Board and a "Brief" regarding the District's Rate Order. The Board considered the Initial Communications received through July 19, 2021 at its meeting on

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that date, and declined Wakileh's request, which denial was communicated to Wakileh by SPH on July 23, 2021. Wakileh responded by filing a utility rate appeal to the Public Utility Commission of Texas (the "PUC") on July 24, 2021, indicating that no one had lived at 6819 Rosemont Park Lane for over three years at that time, and requesting relief from the PUC. The Board was informed of the appeal, but no further information was ever received from either Wakileh or the PUC on this matter. Copies of the Initial Communications are included as **Attachment 1**.

2) Accusations.

- i. The District acts in secrecy.
- ii. The District is not legally entitled to sanitary sewer revenues when no water is used.

II. SECOND COMMUNICATIONS - FEBRUARY 2024 THROUGH APRIL 2024

1) Communication. The District approved an amended Rate Order at its meeting on December 18, 2023, to be effective on February 1, 2024. In the amended Rate Order, there was a scrivener's error that stated the effective date of "February 1, 2023". This error was corrected once it was brought to the District's attention. Between February 25, 2024 and April 10, 2024, Wakileh (i) wrote two letters to the District, (ii) filed a "Complaint" with the PUC, (iii) sent a letter to the District's consultants, and (iv) filed a fourth document with the PUC regarding the District's Rate Order and Director Henry. Copies of these documents are included as **Attachment 2**.

2) Accusations.

- i. Rate Order and rates are unlawful (notice and scrivener error).
- ii. Increase to the Rate Order is unjustified.
- iii. Meetings at SPH are unjustified.
- iv. District offices must be within walking distance of his home.
- v. SPH tampering with District Documents (scrivener error).
- vi. Abuse of authority, indifference, mismanagement, and conflict of interest (general).
- vii. SPH unlawful conduct (routing requests for public information through SPH).
- viii. Unlawful conduct by consultants (not responding to requests for information).
- ix. Greg Henry and other Directors conflict of interest and disqualification.

III. PUC RATE APPEAL AND APPEAL OF PUC DECISION - MAY 2024 THROUGH APRIL 2026

1) PUC Rate Appeal. On May 6, 2024, Wakileh filed a Rate Order Appeal with the PUC (the "Rate Appeal"), along with a list of signatures from at least 10% of District residents pursuant to Texas Water Code Section 13.043 governing appeals of rate orders to the PUC. A copy of the Rate Order Petition and signatory list is included as **Attachment 3**. The appeal was given PUC Control Number 56589, and a list of the filings made is included as **Attachment 4**. At the May 20, 2024 Board meeting, the District engaged the firm of Lloyd Gosselink Rochelle & Townsend, P.C. ("Lloyd Gosselink"), a law firm with extensive

experience with state regulatory matters, to represent the District at the PUC relative to the Rate Appeal. The Rate Appeal reiterated Wakileh's earlier allegations regarding the lawfulness of the Rate Order and the alleged disqualification of Director Henry. Wakileh additionally claimed that increased utility rates in the Rate Order was unnecessary and unjustified.

Ultimately, the PUC dismissed the Rate Appeal due to lack of jurisdiction because Wakileh did not file the Rate Appeal within the 90 day window required by Texas Water Code Section 13.043. A copy of the PUC Order Dismissing the Rate Appeal is included as **Attachment 5**. All told, Wakileh filed 159 separate filings in the Rate Appeal proceeding, including twenty one (21) separate requests for information; each filing required legal time to review and, if necessary, respond. We have not included all of the filings with this memorandum, but the Rate Appeal filings may be viewed in their entirety at:

<https://interchange.puc.texas.gov/search/filings/?UtilityType=A&ControlNumber=56589&ItemMatch=Equal&DocumentType=ALL&SortOrder=Ascending>

This memorandum will not analyze each filing, but we have included a representative sample of filings as **Attachment 6**. Throughout the proceedings, Wakileh levied numerous additional allegations against the District, the Board, SPH, other District consultants, the PUC and its staff, the Administrative Law Judge (the "ALJ"), and court staff. Additionally, Wakileh filed Texas Bar Association complaints, judicial complaints, and criminal complaints against PUC staff and the ALJ. A summary of these additional accusations follows.

- 2) **Appeal of PUC Decision.** Wakileh appealed the PUC's Order Dismissing the Rate Appeal to the Travis County District Court on September 9, 2024. A copy of the Petition is attached as **Attachment 7**. The trial court dismissed his case on February 18, 2026. A copy of the Order of Dismissal is attached as **Attachment 8**. Wakileh failed to appeal this decision timely to the court of appeals. In total, Wakileh made approximately seventy (70) filings in this proceeding; each filing required legal time to review and, if necessary, respond. A full listing of the filings made as part of this appeal can be viewed at:

<https://odysseyweb.traviscountytexas.gov/app/RegisterOfActions/#/92EF1C0EB6C0D004202EC83F013AD6BACA8D1D57A1F8779A58E810E9444E204D2FEB066972565239078BB0A5E13706A2CD0139729B761C7B34B1FC2D9562F657CC1B01A2DA1099BC7CD8C8D867BC6516/anon/portalembd>

3) **Accusations.**

- i. Hiring Lloyd Gosselink was unlawful.
- ii. SPH, along with other consultants, mishandles District funds in a scheme to deceive and rob taxpayers.
- iii. MDS has no authority to propose a Rate Order increase.

- iv. Directors did not fulfil their legal, moral, ethical, or civic duties, and are engaged in criminal activity.
- v. Communication between consultants and preparing the Rate Order and reviewing the Capital Improvement Plan in advance of a meeting is criminal.
- vi. SPH hides information and furnishes false statements.
- vii. SPH misrepresented SPA revenue drop (2022 vs 2023 annual audit).
- viii. SPH and MDS operate the Grand Lakes MUDs without TCEQ approval.
- ix. District spending on law enforcement is fraudulent.
- x. SPH bribes the District bookkeeper.
- xi. Failure to publish exhibits with meeting minutes is unlawful.
- xii. SPH fails to respond to requests for information.
- xiii. Capital improvement plan is fictitious.
- xiv. Landscaping projects are fraudulent.
- xv. Certain information being confidential by law is unlawful.
- xvi. Audits from Fort Bend County and the District do not match (security spending).
- xvii. Touchstone is unlawfully modifying District records at the unlawful instruction of SPH.
- xviii. Lloyd Gosselink engages in judicial thuggery and abuse of the law.
- xix. Objections to discovery requests are unlawful.
- xx. PUC's order requiring Wakileh to indicate where the signatories agreed that Wakileh would represent them in a legal capacity is unlawful, unjustified, improper, unreasonable, unnecessary, unfair, an abuse of discretion, and an abuse of power.
- xxi. ALJ's treatment of the case is arbitrary, capricious, and retaliatory.
- xxii. ALJ is biased and impartial.
- xxiii. PUC wishes to crush the case and avoid uncovering punishable violations.
- xxiv. PUC staff attorneys are criminals acting as the District's attorneys and are a danger to the PUC, the State of Texas, the United States, justice, and the rule of law.
- xxv. PUC criminal tampering and falsely and consciously misleading Wakileh.
- xxvi. ALJ acts in defiance of the law, criminally falsifies facts and evidence, and must recuse herself.
- xxvii. PUC must be shut down.

IV. WATER SHUTOFF

Following the District's amended Rate Order going into effect in February, 2024, Wakileh failed to pay his water bill in full. As a result, he incurred penalties and his water service was terminated in accordance with the District's Rate Order in May, 2024. Following the termination of service, a lock that was placed on the meter to prevent unlawful resumption of service was cut, and service was resumed to Wakileh's home. Following this, the meter was removed, and the pipes were capped to prevent further theft of water. To date, Wakileh has not paid his bill and is without water service. Wakileh continues to utilize the District's sanitary sewer services without payment.

V. DELINQUENT TAX MATTER

- 1) **History.** Wakileh has to date failed to pay his full 2024 tax bill, and has incurred penalties related to such delinquency. Wakileh attempted to pay a partial amount in relation to the amount of time during that year that his property was without water, which the District's tax assessor/collector did not accept. On April 6, 2025, Wakileh sent a letter to the tax assessor/collector explaining his reasoning, reiterating many of his various grievances with the Board, SPH, and MDS, and declaring that he had no intention of paying his taxes. See **Attachment 9**. Accordingly, this letter was forwarded to the District's Delinquent Tax Collection Attorney, who filed a Petition in Fort Bend County District Court on July 2, 2025. A copy of said petition is attached as **Attachment 10**. This matter is ongoing, but Wakileh has filed a Writ of Mandamus with the appeals court and was denied. A copy for Wakileh's Original Answer is attached as **Attachment 11**. All filings may be found at:

<https://tylerpaw.fortbendcountytexas.gov/PublicAccess/CaseDetail.aspx?CaseID=2560614>

- 2) **Accusations.** The main accusations levied against the District in this suit, in addition to reiterating many of the above listed accusations, are:
- i. Illegal retribution.
 - ii. Order Levying Taxes is illegitimate.
 - iii. Resolution Authorizing Additional Penalty On Delinquent Property Taxes is illegal.
 - iv. Tax notices were not properly prepared or delivered.

VI. PETITION FOR INJUNCTIVE RELIEF

- 1) **History.** On March 3, 2026, Wakileh filed a Petition and Application for Injunctive Relief in Fort Bend County District Court. A copy of the Petition is attached as **Attachment 12**. The Petition asks the court for several items, but most notably to (i) invalidate the District's agreement with the District's Delinquent Tax Collection Attorney as well as the Resolution Authorizing Additional Penalty on Delinquent Real Property Taxes adopted in 2025, (ii) cause the District's tax assessor/collector to revise tax statements from 2020 through 2026 and refund and penalties collected, and (iii) grant injunctive relief against the application of any delinquent tax penalty. The District's Delinquent Tax Collection Attorney filed the Initial Answer, attached as **Attachment 13**. The District's insurance carrier was notified of this suit, and engaged the firm of Harris Hilburn, P.L.L.C. ("Harris Hilburn") to defend the District. All filings may be found at:

<https://tylerpaw.fortbendcountytexas.gov/PublicAccess/CaseDetail.aspx?CaseID=2658815>

- 2) **Accusations.** The main accusations levied against the District in this suit, in addition to reiterating many of the above listed accusations, are:
- i. Delinquent Tax Collection Attorney engagement agreement is invalid.
 - ii. The District is not entitled to collect a 20% penalty.
 - iii. Tax statements stating penalties are invalid.

- iv. Harris Hilburn cannot represent the District.

VII. OTHER ACCUSATIONS

Via email correspondence, Wakileh has both repeated the accusations listed above, as well as articulated certain other accusations discussed below. These accusations are in addition to, and often contained in, the dozens of requests for information that Wakileh has filed to date. The two items below are listed here separately as they resulted in investigations from the Fort Bend County District Attorney's Office.

- 1) **Greg Henry(s).** Wakileh believes incorrectly that Director Greg Henry serves simultaneously on the Board of Directors of both the District and Fort Bend County Municipal Utility District No. 165, which would be prohibited. See **Attachment 14**. He has reiterated this complaint in various emails and legal filings. Wakileh made a criminal allegation to the Fort Bend County District Attorney's office, which was investigated and found baseless.
- 2) **Forged Signatures.** Wakileh believes that SPH has forged the signatures of Directors. See **Attachment 15**. He has reiterated this complaint in various emails and legal filings. Wakileh made a criminal allegation to the Fort Bend County District Attorney's office, which was investigated and found baseless.

VIII. EMAILS

- 1) **Emails.** Throughout the District's history of interaction with Wakileh, we have received hundreds of emails from Wakileh. Most of these emails are harassing, rude, insulting, and accusatory. We have attached here, as a representative sample, some of the emails that we receive from Wakileh on a frequent basis. These are intended to provide you with an idea of what it is like to deal with Wakileh on a daily basis. Some of his more colorful insults are "**despicable rat,**" "**filthy rat,**" "**not a smart rat,**" "**a rat like no one has ever seen before,**" "**son-of-a-bitch,**" "**rotten son of a whore,**" "**disgusting criminal,**" "**lawless criminal,**" "**bastard,**" "**coward,**" "**lacking the basic values to be counted among humans,**" "**lawless crooks,**" "**scum of the earth,**" "**disgrace to humanity,**" "**hungry beggars,**" "**rotten,**" "**filthy,**" "**idiots,**" "**despicable,**" "**corrupt,**" "**evil,**" and "**disgraceful.**" These emails are attached as **Attachment 16**.
- 2) **Accusations.** Some of the accusations levied against the District, in addition to reiterating many of the above listed accusations, are:
 - i. Invalid notary.
 - ii. Impropriety with Central Bank.
 - iii. Bond Election Order is invalid.
 - iv. Theft of funds.
 - v. Criminality regarding Vincent Morales, Chad Norvell, and Fort Bend County.
 - vi. Public Information Act violations.

IX. LEGAL COSTS

As of the date hereof, the District has paid Lloyd Gosselink \$216,364.85 to represent the District in the PUC Rate Appeal and Wakileh's Appeal of the PUC's decision. This matter has now been resolved, but Mr. Wakileh has indicated that he intends to attempt to appeal any future increased utility rates in the Districts Rate Order. See **Attachment 17**. Additionally, Wakileh has caused an increase in the amount of time spent on District by SPH including, but not limited to, addressing legal filings, administrative filings, and public information act requests. The District's legal fees to SPH in the calendar years 2022 and 2023 averaged \$10,657.21 and \$11,066.10 per month, respectively, resulting in a two-year average of \$10,861.66 per month (\$130,339.92 annual average). The District's legal fees to SPH in the calendar years 2024 and 2025, years in which SPH has been actively involved with Wakileh, averaged \$15,932.92 and \$18,986.99 per month, respectively, resulting in a two-year average of \$17,459.96 per month (\$209,519.52 annual average); this represents an average increase of 60.75%

X. GRAND LAKES WATER CONTROL AND IMPROVEMENT DISTRICT - PETITION FOR WRIT OF MANDAMUS RELATED TO ELECTIONS

A Writ of Mandamus is an extraordinary remedy that may be granted by an appellate court, including the Supreme Court of Texas, upon petition. It is an order that compels a government official or entity to perform a duty that they are legally required to do, or refrain from acting in a way that is prohibited by law.

On May 27, 2026 Wakileh filed a Petition for Writ of Mandamus with the Supreme Court of Texas (the "Petition") related to the Grand Lakes Water Control and Improvement District (the "WCID") and the May 2, 2026 Directors Election that was ultimately cancelled by the WCID due to lack of opposition to the incumbent candidates in accordance with the Texas Election Code. The Petition asks that the Supreme Court (i) set aside its Order Declaring Candidates Elected adopted on March 26, 2026, (ii) compel the WCID to order, post notice for, and conduct a special directors election, (iii) order the WCID to comply with all statutory requirements for all future election proceedings, and (iv) grant such other relief as Wakileh may be entitled to.

As of the date hereof, the Supreme Court of Texas has not taken any action on the Petition, and thus the WCID has not yet engaged legal counsel on this matter. However, Wakileh has begun sending public information act requests to the WCID, and he may attempt other legal actions against the WCID in the future. While the Petition and these other legal actions do not impact the District directly, the residents of the District are also residents of the WCID. A full listing of the filings made as part of this Petition can be viewed at:

<https://search.txcourts.gov/Case.aspx?cn=26-0540&coa=cossup>