

OFFICE OF THE CHIEF DISCIPLINARY COUNSEL
STATE BAR OF TEXAS
GRIEVANCE FORM

GENERAL INFORMATION

I have not contacted the Client-Attorney Assistance Program. This complaint does not involve a dispute with my lawyer.

INFORMATION ABOUT YOU -- PLEASE KEEP CURRENT

Name:
Address:
City:
State:
Zip Code:
Telephone numbers:
 Residence:
 Work:
 Cell:

Email

I understand and write in the English language.

Are you a Judge? If yes, please provide
NO

INFORMATION ABOUT ATTORNEY:

This is a complaint about: Geoffrey Lloyd Harrison
Texas Bar Number: 00785947
Work Address: 1000 Louisiana Street, Suite 5100, Houston Texas
Work Phone Number: 713-653-7807.
Position: Partner, Susman Godfrey, LLP

Have you or a member of your family filed a grievance about this attorney previously?
Yes ___ **No X** ___

If "yes", please state its approximate date and outcome.

INFORMATION ABOUT ATTORNEY'S REPRESENTATION:

Mr. Harrison represents the City of Houston in Cause No. 2014-44974; *Woodfill v. Parker; In the 152d District Court; Harris County, Texas.*

IF YOU DID NOT HIRE THE ATTORNEY, WHAT IS YOUR CONNECTION WITH THE ATTORNEY? EXPLAIN BRIEFLY:

Mr. Harrison volunteered to represent the City of Houston in a highly controversial litigation matter that has gained international notoriety because of the salacious nature of the underlying issue. In the course of that representation, Mr. Harrison engaged in reprehensible misconduct

that raises serious questions about his fitness to practice law in Texas. I became aware of the misconduct through following national media and internet reports of the activities in that case.

ARE YOU CURRENTLY REPRESENTED BY AN ATTORNEY IN CONNECTION WITH THIS COMPLAINT?

YES _____ **No**

If yes, please provide information about your current attorney:

INFORMATION ABOUT ANY IMPAIRMENT FOR THIS ATTORNEY:

I have no knowledge concerning any mental impairment of this attorney, nor any information regarding any possible substance use or abuse for this attorney.

INFORMATION ABOUT YOUR GRIEVANCE:

Where did the activity you are complaining about occur?

County: Harris County
City: Houston, Texas

If your grievance is about a lawsuit, answer the following, if known:

Name of court: 152d District Court, Harris County, Texas
Title of the suit: Woodfill v. Parker
Case number: Cause No. 2014-44974;
Date suit was filed: August 5, 2014

If you are not a party to this suit, what is your connection with it? Explain briefly.

I am an American citizen, concerned about the wide-spread abuse of government power in this country, and the increasing frequency with which government officials and government employees use the power of their position to stifle constitutional freedoms, such as freedom of speech, freedom of religion, freedom of assembly and association, and freedom to petition for redress of grievances against the government overreaching.

If you have copies of court documents, please attach.

<https://www.dropbox.com/s/8mo7i0aelsqtyso/RECORD%20-%20TxSCt%20Mandamus%20File.zip?dl=0>

This is a link to a condensed "zip" file. The file contains the official "Record" (documents) filed with the Texas Supreme Court in Cause No. 14-0667; *Woodfill v. Parker*; Writ of Mandamus. All of these documents support this Complaint.

Explain in detail why you think this attorney has done something improper or has failed to do something which should have been done.

This is a complaint about Geoffrey Lloyd Harrison: Texas Bar Number, 00785947; Work Address, 1000 Louisiana Street, Suite 5100, Houston Texas: Work Phone Number, 713-653-7807. Mr. Harrison is a Partner, with the Houston office of Susman Godfrey, LLP.

Mr. Harrison volunteered to represent the City of Houston in a highly controversial litigation matter that had gained international notoriety because of the salacious nature of the underlying issue. The case is styled: Cause No. 2014-44974; *Woodfill v. Parker*; *In the 152d District Court*;

Harris County, Texas. In the course of that representation, Mr. Harrison engaged in reprehensible misconduct that raises serious questions about his fitness to practice law in Texas.

Earlier this year, the Mayor of Houston pushed through a new City ordinance that made it a crime for any businessman, contractor, or provider of public services, to prohibit biological males from using traditional female facilities, and vice versa. The Houston Mayor who drafted and sponsored the enactment is openly homosexual, herself, so the cause had extraordinarily important meaning to her personally.

Citizens of Houston tried to repeal the ordinance through a referendum petition. There was a great deal of public outcry over the new ordinance. A number of social and religious organizations were very vocal about their opposition to the Mayor's new law. Many of the City's largest Christian churches led the drive to get signatures on the referendum petition. This obviously angered the Mayor. So much so, that the Mayor and the City Attorney aggressively interfered in the lawful certification process of that petition. At a public press conference, they announced that not enough valid signatures appeared on the referendum petition. Not only were they lying about that fact, but under the City Charter they had no legal authority to reject the petition which had been certified already by the proper authority, the City Secretary.

Almost immediately, a few people who had signed that petition sued the Mayor and the City. The extremely narrow focus of that lawsuit dealt strictly with the number of valid signatures on the referendum petition. The merits of the new "gay" ordinance were not before the court, neither was any issues concerning the attitude of the Christian religious community toward homosexuals, or the manner in which Houston citizens had organized to exercise their constitutional rights to oppose the radical and unlawful activities of their City government.

Nevertheless, Mr. Harrison reportedly jumped into the controversy as a pro bono lawyer for the City, and promptly used his position to launch an illegal, unethical, and completely unprincipled political attack on Christianity, and the constitutionally protected fundamental rights of the people of Houston, including freedom of religion, freedom of speech, freedom of assembly and association, and freedom to petition government for the redress of grievances, all in violation of his public oath of office, numerous rules of ethics, several criminal and civil statutes, and the sacred public trust granted to him when he was admitted to practice law in the State of Texas.

Mr. Harrison attacked five of the most prominent church leaders in Houston; men who had openly opposed the Mayor and her homosexual ordinance. Those Christian leaders spoke out loudly and often, and they helped organize the petition drive. Because of their open displeasure with the Mayor and her immoral, anti-Christian policies, Mr. Harrison targeted each of those clergymen with a 16 page subpoena demanding endless volumes of Holy Scripture, private communications with parishioners, protected documents dealing with the pastor's personal opinion of the Mayor, homosexuals, gender confusion; together with the drafts and texts of every Holy Sermon prepared or delivered by these pastors in the sanctuary of the Christian Church. Each subpoena also included a threat to have the clergymen arrested and jailed if they resisted Mr. Harrison's demands.

Most importantly, not one single item demanded in any of the subpoenas was relevant to any issue in the actual lawsuit in which they were issued. None of the documents would have been admissible, and none of them would have led to the discovery of any admissible evidence. The

self-evident purpose for attacking the pastors this way was strictly to punish them for voicing opposition to the government's actions and policies, and to send a terrifying message to the public at large, warning them about what will happen to them if they stand up and oppose anything the government wants to do to them. This was pure retaliation. The subpoenas served no purpose other than to hurt Christians and anyone else who disagreed with the insatiable power of the far Left in today's government at every level.

Mr. Harrison's improper motive for harassing and terrorizing these Christian pastors has been confirmed. On October 29, 2014, press reports state that the Mayor instructed her lawyers to withdraw the Subpoenas which form the basis for this complaint. The Woodfill v. Parker lawsuit is still pending, so it would appear the Mayor and the City still need to present their legal defense. Yet, miraculously, the bales of highly controversial documents sought in the 16 page subpoenas no longer seem to matter anymore.

There is no room for debate. Nothing in the subpoenas was useful or necessary to the defense. The subpoenas had a completely different mission, and that mission was accomplished when the international media broadcast the news that pastors who spoke out against the Queen of Houston had been punished publically. They had been told to shut up or else! The documents themselves were never relevant. They were camouflage. The real goal was retribution.

Lawyers in Texas are strictly prohibited from using third party discovery subpoenas as a weapon to punish people who exercise their constitutional rights of free speech, freedom to worship, freedom to assemble, freedom to associate, and freedom to redress grievance. See, Rule 4.04, TDCPR.

Every Texas lawyer, including Harrison, took an oath of office in which they swore to support the U.S. and Texas Constitutions. Supporting the Constitution is not accomplished by using a law license to punish people who tried to exercise their basic rights guaranteed under those Constitutions. See, Oath, Texas Lawyers: U.S. Constitution, 1st Amendment; Texas Constitution, Section 6, Section 8, and Section 27.

Lawyers are not allowed to single out a specific group of people, or specific individuals within those groups, for punitive legal action just because they belong to a particular religion, such as Christianity, or just because they hold a differing belief about social issues, such as homosexuality. See, Rule 5.08, TDRPC.

Lawyers are strictly prohibited from using their law license to engage in an action the lawyer knows, or should know, is frivolous, unjustified, or objectively unreasonable. Rule 3.01 TDRPC.

Texas Lawyers are strictly prohibited from taking actions in a lawsuit just to increase to costs or burdens on others in the litigation. See Rule 3.02 TDRPC.

Texas Lawyers are strictly prohibited from engaging in criminal activity that reflects on their honesty or trustworthiness, or engaging in dishonesty, fraud, deceit or misrepresentation, or

engaging in (or assisting others to engage in) activity that violates the rules of ethics. See Rule 8.04 TDRPC

Texas Lawyers are strictly prohibited from asking irrelevant, immaterial questions that are merely intended to degrade a witness, or to take any action intended solely to disrupt the proceeding, See Rule 3.04 TDCPR.

A Texas lawyer has an absolute duty to tell a third party on whom discovery has been served that the discovery is sought by his client as a political weapon and has no legitimate legal basis, and the entire discovery action is actually illegal and unconstitutional. See, Rule 4.01 TDRPC

Texas Lawyers are strictly prohibited from conspiring with their clients to break the law, or to do immoral, unethical, and repugnant things, especially when the client is a government organization. See Rules 7.06, 2.01, 1.02, 1.03, 1.12 and 1.15.

Mr. Harrison acted in such a manner and with such complete disregard for his oath, the canons of ethics, the legality of his actions, or the horrific and degrading effect of his conduct on the entire membership of the Texas State Bar, that the most severe sanctions available are appropriate in his case.

If you have copies of letters or other documents you believe are relevant to your grievance, please attach. Do not send originals, as they will not be returned. Additionally, please do not use staples, post-it notes, or binding.

<https://www.dropbox.com/s/8mo7i0aelsqtyso/RECORD%20-%20TxSct%20Mandamus%20File.zip?dl=0>

This is a link to a condensed “zip” file. The file contains the official “Record” (documents) filed with the Texas Supreme Court in Cause No. 14-0667; *Woodfill v. Parker*; Writ of Mandamus. All of these documents support this Complaint. **Alternatively:** The same documents are available directly from Texas Supreme Court.

<http://www.search.txcourts.gov/Case.aspx?cn=14-0667&coa=cossup#sthash.kcp5hakj.dpuf>

This URL will connect you to “Case Information” for Cause No. 14-0667; *Woodfill v. Parker*. There is a chart called “Case Events”. There is an entry on that chart with the following information:

08/26/2014	“Case Record Filed”	Mandamus Record filed on behalf of Jared Woodfill, et al. –	[PDF/17.06 MB]
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Click on “PDF/17.06 MB”. That will take you to the official “Record” (documents) filed with the Texas Supreme Court in *Cause No. 14-0667; Woodfill v. Parker; Writ of Mandamus*. All of these documents support this Complaint.

Include the names, addresses, and telephone number of all persons who know something about your grievance.

The incident involved in this complaint has been reported extensively through every form of media around the world for more than two months. It would be impossible to identify everyone who has knowledge about this grievance. For example, if you make an internet inquiry using any form of the description for the underlying incident, such as; “Mayor Subpoenas Sermons”, you will get millions of online articles in response.

If you check the online archive files for any of the national news media; such as Fox, ABC, CBS, NBC, you will find numerous stories concerning the “Subpoena for Sermons”, etc. I can provide more specific information is necessary.

Also, please be advised that a copy of your grievance will be forwarded to the attorney named in your grievance.

HOW DID YOU LEARN ABOUT THE STATE BAR OF TEXAS' ATTORNEY GRIEVANCE PROCESS?

I learned about the Texas attorney Grievance Process through friends and other persons who are concerned about the problems identified in this complaint.

ATTORNEY-CLIENT PRIVILEGE WAIVER

~~I hereby expressly waive any attorney-client privilege as to the attorney, the subject of this grievance, and authorize such attorney to reveal any information in the professional relationship to the Office of Chief Disciplinary Counsel of the State Bar of Texas.~~

NOT APPLICABLE – THIS IS NOT MY LAWYER

I understand that the Office of Chief Disciplinary Counsel maintains as confidential the processing of Grievances.

Signature: _____ Date: _____

**TO ENSURE PROMPT ATTENTION, THE GRIEVANCE SHOULD BE MAILED TO:
THE OFFICE OF CHIEF DISCIPLINARY COUNSEL
P.O. Box 13287
Austin, Texas 78711**

FAX TO (512) 427-4169