

NO.

In the
Supreme Court of Texas

In re,
R. Lance Flores,
The Dallas Libertarian Post,
in the general public interest of the Texas Electorate,
Relator.

PETITION FOR WRIT OF MANDAMUS

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STATEMENT OF THE CASE

Nature of underlying proceeding: This is an election mandamus concerning a candidate's eligibility and a Libertarian Party of Texas Chair's requirement or duty to issue a declaration of ineligibility and notice the candidate.

Respondent: David DeLamar, Chair of the Libertarian Party of Texas

Relief sought: Writ of Mandamus directing David DeLamar, Chair of the Libertarian Party of Texas to declare Clifford F. William ineligible and give William written notice of that declaration. Alternatively order the Secretary to do same. Declaration that Clifford F. William is ineligible to file for the office of Chief Justice of the Supreme Court of Texas. Declaration that candidate is ineligible.

STATEMENT OF JURISDICTION

This court has jurisdiction to entertain the petition and to issue a writ by virtue of the Tex. Elec. Code § 273.061,¹ where jurisdiction over this original proceeding also lies pursuant to Tex. Gov. Code § 22.002(a) and Tex. Const. Art. V § 6.

¹ Tex. Elec. Code § 273.061 (Vernon 1986), and section Tex. Elec. Code § 161.009, provides:

"Jurisdiction The supreme court or a court of appeals may issue a writ of mandamus to compel the performance of any duty imposed by law in connection with the holding of an election or a political party convention, regardless of whether the person responsible for performing the duty is a public officer [emphasis added] . . . Party Officer Subject to Mandamus The performance of a duty placed by this code on an officer of a political party is enforceable by writ of mandamus in the same manner as if the party officer were a public officer." *Sears v. Bayoud, Secretary of the State of Texas, Et al.*, 786 S.W.2d 248 (1990 Tex.) LEXIS 15; 33 Tex. Sup. J. 228

ISSUES PRESENTED FOR RELIEF

1. Whether the Chair of the Libertarian Party of Texas is an official subject to Tex. Elec. Code § 145.003 and Tex. Elec. Code § 145.035;

2. whether the Chair of the Libertarian Party of Texas had a ministerial duty when presented with a public record containing information pertinent to the candidate's eligibility, to promptly review that record, and to declare a candidate ineligible if the record establishes the candidate is ineligible; and

3. whether the Chair of the Libertarian Party of Texas may escape his ministerial duty to declare a candidate ineligible by a declaration made by an executive committee or by another executive body appointed by the Chair.

I. STATEMENT OF FACTS

1. On 02/28/2002 the Relator became aware of a number of inconsistencies concerning Clifford F. William's veracity and credentials related by a February 28, 2002 story published in the Houston Chronicle daily newspaper² concerning, *inter alia*, William's reported age³ and qualifications for the office of Chief Justice of the Texas Supreme Court. (R. tab A)

2. On 03/02/2002 an Internet candidate forum was announced that invited media and public participation to interact directly on March 4, 2002, with Clifford F. William and Royce Mitchell, applicants for the Libertarian Party Supreme Court nominations for Chief Justice and Justice Place 1, respectively, to resolve the issues of qualification and evidence the candidates' eligibility.(R. tab C)

3. On 03/05/2002 the DLP published the results of its initial forty (40) minutes of the March 4, 2002 forum in the February edition (R. tab D)⁴ in section B News Update (R. tab E at doc. p.5). The published results presented questions and answers related to William's statements concerning his law training credentials⁵ and acknowledgment by William that his

² See, Ron Nissimov, *Libertarians say state is after them*, Hou. Chron., Feb. 28, 2002, 4:58 P.m. (R. tab A)

³ *Ibid.* at doc. p.1, ¶ 2; compare age with Dal. Lib. Post database search of Harris County Voter Registration (R. tab B).

⁴ Dal. Lib. Post - February cover page.

⁵ Compare (R. tab A, doc. p.1 ¶ 2) Nissimov, *supra* ". . . William said he earned a doctorate in jurisprudence in the 1980's through correspondence courses from Greenwich University . . ." with (R. tab E, doc. p.7) question seven, A: [William] My law degree is from Greenridge University and my pastoral counseling is from Universal Life Church."

license to practice law, a requirement⁶ for office, was in question.⁷

4. Upon the knowledge of the foregoing, the Relator inquired into public records and on 05/07/2002 obtained the following:

A. A copy of a public document from John T. Adams, Clerk of The Supreme Court of Texas⁹ (Apx. tab B) saying and certifying:

“that upon searching the records in my custody, find no record of a person under the name of Clifford F. William licensed to practice as an attorney and counselor at law in the STATE of TEXAS.”

B. A copy of a Temporary Injunction¹⁰ (Apx. tab C) where in the findings of facts show:

“**CLIFFORD F. WILLIAM** is not a licensed attorney in the State of Texas and he does not possess the necessary skill, knowledge and training to direct the selection of documents, or the information to be contained therein, for the litigant.”

5. On 05/07/2002 Relator delivered a notice of ineligibility to Geoffrey Neale, then Chair of the Libertarian Party of Texas:

⁶ “No person shall be eligible to serve in the office of Chief Justice or Justice of the Supreme Court unless the person is licensed to practice law in this state and is, at the time of election, a citizen of the United States and of this state, and has attained the age of thirty-five years, and has been a practicing lawyer, or a lawyer and judge of a court of record together at least ten years.” Tex. Const. Art. V § 2 (b).

⁷ See (R. tab E at doc. p.8) “Q :[DLP] How will your current legal problems on practicing law with a license affect your ability to run . . . A: [William] None at all. In fact I consider it an asset . . .”

⁹ Document was initially secured by Unauthorized Practice of Law Committee

¹⁰ *UPLC v. William*, No. 2002-01066 (270TH Tex. Dist. Ct. Harris Co. 2002) Temporary Injunction executed on February 1, 2002.

A. by telephonic transmission (FAX), *Notice of Claim of Ineligibility of Clifford Fuddy Williams* [sic] *Applicant for Candidacy for the Supreme Court of Texas* (Apx. tab A) and copies of the certificate from the Clerk of the Supreme Court of Texas (Apx. tab B) and the Temporary Injunction (Apx. tab C), collectively hereinafter the “Public Records,” and

B. by Internet e-mail message (Apx. tab D) giving care attention to note that:

- (1) the telephonic transmission¹¹ of the *Notice of Claim of Ineligibility &c.* (the “Notice”) to his location had been confirmed received; and that,
- (2) the Relator had additionally despatched a request to Dee Stacey of the Membership Department at the Texas State Bar in Austin, Texas to secure an original record from John T. Adams, Clerk of The Supreme Court of Texas, and forward that record with a letter from the Relator to Neale’s Austin address. (Apx. tab E)

6. On the same day, Tuesday, May 7, 2002, Geoffrey Neale acknowledged by e-mail receipt of the Notice. (Apx. tab F)

7. On 06/08/2002 an account of the prior night’s *ad hoc* SLEC (State Libertarian Executive Committee) meeting events was released to the Associated Press Dallas bureau at or about 7:50 P.m CST documenting the refusal of Geoffrey Neale to declare the ineligibility of Clifford F. William and allow the replacement by a candidate eligible to sit as the Chief

¹¹ *supra*, ¶ [1.5.A](#)

Justice of the Supreme Court of Texas. A copy of the press release and notice of William's ineligibility with the attachments of *Public Records*, was personally delivered to David DeLamar, the current chair of the Libertarian Party of Texas by the Relator at 11:02 A.m. o'clock CST outside the meeting hall where the Libertarian Party of Texas 2002 State Convention proceedings were taking place. (Apx. tab G)

8. On 06/12/2002 Geoffrey Neale, Convention Chair of the Libertarian Party of Texas 2002 State Convention, and whose position of Chair of the Libertarian Party of Texas terminated at the closing of the 2002 State Convention on June 9, 2002, filed the convention results with Gwen Shea, Texas Secretary of State, which included Clifford F. William, on application filed with Geoffrey Neale, as the Libertarian Party candidate for Chief Justice of the Supreme Court of Texas. (Apx. tab H)

9. On 06/17/2002 Andrew Weber, Clerk of the Supreme Court of Texas again certified that upon searching the roll of attorneys for the State of Texas he found no record of a person under the name of Clifford F. William licensed to practice as an attorney and counselor at law in the State of Texas. (Apx. tab I)

10. Tex. Elec. Code § 145.003. Administrative Declaration of Ineligibility¹² — declares:

(a) Except for a judicial action in which a candidate's eligibility is in issue, a candidate may be declared ineligible only as provided by this section.

¹² Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986. Amended by Acts 1991, 72nd Leg., ch. 203, § 2.58; Acts 1991, 72nd Leg., ch. 554, § 29, eff. Sept. 1, 1991; Acts 1993, 73rd Leg., ch. 728, § 56, eff. Sept. 1, 1993.

(b) A candidate in the general election for state and county officers may be declared ineligible before the 30th day preceding election day by:

(1) the party officer responsible for certifying the candidate's name for placement on the general election ballot, in the case of a candidate who is a political party's nominee; or

(2) the authority with whom the candidate's application for a place on the ballot is required to be filed, in the case of an independent candidate.

(c) A candidate in an election other than the general election for state and county officers may be declared ineligible before the beginning of early voting by personal appearance by the authority with whom an application for a place on the ballot for the office sought by the candidate is required to be filed.

(d) The presiding officer of the final canvassing authority for the office sought by a candidate may declare the candidate ineligible after the polls close on election day and, except as provided by Subsection (e), before a certificate of election is issued.

(e) In the case of a candidate for governor or lieutenant governor, a declaration of ineligibility by the final canvassing authority's presiding officer may not be made after the final canvass for that office is completed.

(f) A candidate may be declared ineligible only if:

(1) the information on the candidate's application for a place on the ballot indicates that the candidate is ineligible for the office; or

(2) facts indicating that the candidate is ineligible are conclusively established by another public record.

(g) When presented with an application for a place on the ballot or another public record containing information pertinent to a candidate's eligibility, the appropriate authority shall promptly review the record. If the authority determines that the record establishes ineligibility as provided by Subsection (f), the authority

shall declare the candidate ineligible.

(h) If a candidate is declared ineligible after the deadline for omitting an ineligible candidate's name from the ballot, the authority making the declaration shall promptly certify in writing the declaration of ineligibility to the canvassing authority for the election.

(i) If a candidate is declared ineligible, the authority making the declaration shall promptly give written notice of the declaration of ineligibility to the candidate.

11. Tex. Elec. Code § 145.035. Withdrawn, Deceased, or Ineligible Candidate's Name

Omitted From Ballot¹³ — provides:

A candidate's name shall be omitted from the ballot if the candidate withdraws, dies, or is declared ineligible on or before the 65th day before election day.

¹³ Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

II. ARGUMENT

1. It is apparent in the instant case that both Clifford F. William, the applicant, and Geoffrey Neale, *the party officer responsible for certifying the candidate's name for placement on the general election ballot*,¹⁴ were aware that William was not qualified to hold the office of Chief Justice of the Supreme Court of Texas; William obviously earlier¹⁵ than Neale, who was notified in three communications by three different mediums and methods of communications.¹⁶ Because Neale was not only presented with the *manifest* evidence, but also, the prevailing statutory requirement establishing his ministerial duty to review and make a declaration of ineligibility, he lacked any discretion in the matter and could not escape his lawful charge to perform that duty by ignoring these facts;¹⁷ Neale had the sole responsibility and duty to issue the declaration of ineligibility as the Secretary of State *does not have the duty to certify names on the ballot for the [convention]* nor could the Relator or any party have sought mandamus relief to compel the Secretary of State because of ripeness of the issue.¹⁸

2. As for David DeLamar's, the current Libertarian Party of Texas Chair, prior knowledge of the William's invalid application, such establishes a *prima facie* continuation of deception

¹⁴ Tex. Elec. Code § 145.003 (b)(1).

¹⁵ *supra*, footnote 2, Nissimov

¹⁶ *supra*, at ¶ 1.5

¹⁷ See discussion in *Sears* at (Apx. tab J, doc. p.6, Rel. n^o) [document page 6 at Relator's Note N^o 6 — *Sears v. Bayoud, et al.*])

¹⁸ *Id.* at doc. p.6, Rel. n^o.

concerning William’s eligibility by all three actors. It was incumbent upon DeLamar, because he was presented with the notice and related statute the day of his election as chair, that he acted with due diligence immediately following the time his authority and public duty was vested¹⁹ to issue the declaration of ineligibility and notify William. He did not.

3. Undoubtedly, the record shows each had been presented with legally *manifest* evidence²⁰ which included a certificate from the Supreme Court of Texas²¹ (*supra* at ¶ [L.4.A](#)) and the findings from the 270TH Judicial District Court.²² It thus follows, that from the time of William’s submission of his application, or, the very least, from the time of issuance²³ of the Temporary Injunction,²² William knew his application was invalid. Further, Neale had known of the application’s invalidity since Tuesday, May 7, 2002 (¶¶ [L.5](#) - [L.6](#)). It was not for either Neale nor DeLamar to consider some unestablished hypothetical legal consideration to preclude their duty to issue the declaration of ineligibility and notification to William of the

¹⁹ See (Apx. tab K, doc. p.2 Rel. n① [Relator’s Note 1 — *In re Gibson*]) (“As the officer of the Republican Party responsible for submitting the names of candidates to be placed on the primary election ballot, M. A. Taylor is subject to a writ of mandamus directing him to comply with the duties imposed on him by the Election Code . . . Consequently, if we conclude that Collins has failed to satisfy the statutory requirements imposed on potential candidates, then we will issue a writ ordering M. A. Taylor to declare Collins ineligible and to remove Collins’ name from the list of candidates submitted.” *In re Gibson*, 960 S.W.2d 418 (Tex. App.—Waco 1998) citing *Davis v. Taylor*, 930 S.W.2d 581, 584 (Tex. 1996); *Sears*, 786 S.W.2d at 249; *Escobar v. Sutherland*, 917 S.W.2d 399, 404 (Tex. App.— El Paso 1996, orig. proceeding); *Bejarano v. Hunter*, 899 S.W.2d 346, 349 (Tex. App.— El Paso 1995); *Strachan v. Lanier*, 867 S.W.2d 52 (Tex. App.— Houston [1st Dist.] 1993).

²⁰ Notwithstanding, the official party records which included or should have included the original notices from the Relator and the Clerk of the Supreme Court of Texas.

²¹ The certificate from the Clerk of the Supreme Court of Texas is a public *official record* that establishes Clifford F. William is not licensed to practice law in the State of Texas. See (Apx. tab J, doc. p.2 Rel. n② [*Sears v. Bayoud, et al.*]). And restated at Rel. n⑥ citing *Hayes v. Harris County Democratic Executive Committee*, 563 S.W.2d 884, 885 (Tex. Civ. App. -- Houston [14th Dist.] 1978, no writ)

²² ¶ [L.4.B](#). Relator advancing henceforth that the Temporary Injunction is a public record pursuant to Tex. Elec. Code § 145.003 (g).

²³ See ¶ [L.4.B](#)

declaration; it was incumbent upon William to make such pursuits in a judicial forum.

4. It is the purpose of the notice of ineligibility²⁴ to give a candidate the opportunity to provide *manifest proof* of his eligibility or to seek relief from the courts if there is a legal challenge to procedure, fact, or to statutory or constitutional interpretation.²⁵ The chair of a political party is neither vested constitutionally nor by statute with either authority or jurisdiction to render legal opinions or determinations of law; the charge imposed by the Texas Election Code to the chair of a political party is strictly administrative, thus, a *functus officio* duty of the position.

5. Within the copiousness of opinion and obiter dicta rendered by this Court in original proceedings brought before it on such matters, the predominant body of issues to which the Court has spoken relates to vagueness or particulars of the non-aliquot portions of legislation needed to be construed for necessarily valid applications and candidate eligibility. These things are among those disputes in law which rational minds might disagree; witnesseth, the frequency of descents in recent years; *e.g.*, particularly the impassioned rhetoric in descents such as that in *Sears* or by Justice Baker joined by Justice Hankinson in *Bell*.²⁶ Such things

²⁴ Tex. Elec. Code § 145.003 (i). “If a candidate is declared ineligible, the authority making the declaration shall promptly give written notice of the declaration of ineligibility to the candidate.” Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986. Amended by Acts 1991, 72nd Leg., ch. 203, § 2.58; Acts 1991, 72nd Leg., ch. 554, § 29, eff. Sept. 1, 1991; Acts 1993, 73rd Leg., ch. 728, § 56, eff. Sept. 1, 1993.

²⁵ Tex. Elec. Code § 145.004. Final Judgment Required for Adjudication of Ineligibility: “A candidate’s entitlement to a place on the ballot or to a certificate of election is not affected by a judicial determination that the candidate is ineligible until a judgment declaring the candidate to be ineligible becomes final.” Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

²⁶ *In re Kevin H. Bell*, 45 Tex. Sup. J. 336 (Tex. 2002).

have been long observed in matters of political judicature, *et seq.*

Of political justice part is natural, part legal, natural, that which everywhere has the same force and does not exist by people's thinking this or that; legal, that which is originally indifferent, but when it has been laid down is not indifferent, e.g. that a prisoner's ransom shall be a mina, or that a goat and not two sheep shall be sacrificed, and again all the laws that are passed for particular cases, e.g. that sacrifice shall be made in honour of Brasidas, and the provisions of decrees.²⁷

By nature, this may be otherwise in the unqualified framing of fact and circumstance.

Withstandan this, such is not the case today. For indeed here, *fire burns as it does in Persia.*

6. Unlike the issues pondered by the Court in the elections cases cited in this instrument – that which is brought before the Court in the instant cause does not hinge on slight interpretations of legislative intent. An examination of Texas legislation related to the amendments of in the 1997 Election Code, makes it apparent the Legislature, in its contemplation of amending the Code, was deeply concerned, *inter alia*, about preventing election fraud.²⁸ Moreover, throughout the Court's review of candidate qualification matters in elections, its opinions are replete with references to election fraud related to the purpose of the 1997 amendments to Texas Election Code. e.g.:

“The legislative history to the 1997 Election Code amendments indicates that the Legislature was concerned with, among other

²⁷ Aristotle – *Nicomachean Ethics*, Book V Chapter 7.

²⁸ See Senate Comm. on State Affairs, Bill Analysis, Tex. H.B. 331, 75th Leg., R.S. (1997); House Comm. on Elections, Bill Analysis, Tex. H.B. 331, 75th Leg., R.S. (1997)

things, preventing election fraud.” Justice O’Neill writing for the majority in *Bell*.²⁹ (Apx. tab L, at Rel. n①)

7. As it is inescapable that Neale and DeLamar thwarted their required duty¹⁷ it is also certain that they cannot argue that such was necessary to protect the interests of William, as the Texas 69th Legislature clearly provided a forum as well as the protection²⁵ of *a candidate’s entitlement to a place on the ballot*.³⁰ Thus, the unlawful acts of Neale and DeLamar, *quo animo*, effected judicial determination outside their authority and jurisdiction through and by their indifference toward their duty, callous pretermission of the Texas electorate and their intentional disregard for the law. By their doing so, the Texas electorate is deceived and the process of judicial determination intentionally averted. William had to have knowingly, intentionally, and under oath filed an application he new was false with Neale and superadded the fact of election fraud. He had adequate remedy prior to filing but failed to avail himself of the courts, and in the stead of a legal remedy, chose *fraud in fact* in an attempt to secure the execution of a document, the Secretary of State ballot certification, by deception, and engaged, *in pari delicto*, Neale and DeLamar. To such acts and conduct, does not the legislative history of the 1997 Election Code amendments³¹ address? We might

²⁹ *consider also, Bell (Apx. tab L, at Rel. n.②)* “We believe that these most recent decisions apply a rationale that furthers one of the principal purposes behind the Election Code – the prevention of election fraud . . .” citing Tex. Gov. Code § 311.021 (3) and referring to the Court’s citations of *Strachan v. Lanier*, 867 S.W.2d 52, 53 (Tex. App.-- Houston [1st Dist.] 1993); *Reese v. Commissioners’ Court of Cherokee County*, 861 S.W.2d 281, 283 (Tex. App.-- Tyler 1993); *Love v. Veselka*, 764 S.W.2d 564, 565 (Tex. App.-- Houston [1st Dist.] 1988); *Bacon v. Harris County Republican Executive Comm.*, 743 S.W.2d 369, 371 (Tex. App.-- Houston [14th Dist.] 1988).

³⁰ Tex. Elec. Code § 145.004

³¹ *supra, Bell* citation at [II.6](#)

reasonably expect so.

III. PRAYER

Relator respectfully requests that the Court grant his petition and issue a mandamus ordering David DeLamar to issue the declaration of ineligibility of Clifford F. William, as Libertarian Party of Texas candidate for the Chief Justice of the Supreme Court of Texas and immediately notify Clifford F. William and certify to the Clerk of the Supreme Court of Texas that he has done so. Order the Secretary of State to remove Clifford F. William from the November 2002 ballot if a judgment declaring the candidate to be ineligible becomes final. In the alternative, similarly order Gwyn Shea, Secretary of State, to do same. Declare Clifford F. William, in the present, an ineligible candidate for the office as Chief Justice of the Supreme Court of Texas.

Relator further prays the Court grant any further relief or sanction to which he may be entitled hereto or as the Court may determine from subsequent motion to or by the Court.

Respectfully submitted,

R. Lance Flores

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Dallas, Texas 75227-5419
(214) 381-1295 (Voice/Facsimile)
E-mail: DLPost@lpdallas.org

IV. VERIFICATION

scil.

STATE OF TEXAS §
 §
COUNTY OF DALLAS §

BEFORE ME, the undersigned authority, personally appeared R. Lance Flores, a person whose identity is known to me. After I administered an oath to him, upon his oath, said "I am the undersigned, Relator in the foregoing instrument, PETITION FOR WRIT OF MANDAMUS; I have read that instrument and attest that the facts stated in it are within my personal knowledge and they are true and correct. I further attest to the authenticity of the attached documents and certify that they are true and correct copies or facsimiles of the original documents.

SIGNED on this, the 24TH day of July, 2002.

R. Lance Flores
Relator

SIGNED AND SWORN to under oath which witness my hand and seal of office, on this, the _____ day of _____, 2002.

Notary Public, in and for
the State of Texas

Seal

V. CERTIFICATE OF SERVICE

I certify that I served by the method and date indicated below, a copy of this Petition for Writ of Mandamus to the following parties:

David DeLamar, Chair, Libertarian Party of Texas PO Box 98131 Lubbock, Texas 79499-8131 Fax: (806) 795-5216 chair@lptexas.org	RESPONDENT	Served <u>07/26/2002</u> By: <input checked="" type="checkbox"/> U.S. Postal Service <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Commercial Delivery _____ <input type="checkbox"/> Electronic Facsimile (Telephonic Xmsn) <input type="checkbox"/> E-mail PDF fmt w/expr waiver of service
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Clifford Fuddy William 8915 Sangamon Houston, Texas 77074 E-mail: law@hal-pc.com	REAL PARTY IN INTEREST	Served <u>07/26/2002</u> By: <input checked="" type="checkbox"/> U.S. Postal Service <input type="checkbox"/> Certified Mail <input type="checkbox"/> Commercial Delivery _____ <input type="checkbox"/> Electronic Facsimile (Telephonic Xmsn) <input type="checkbox"/> E-mail PDF fmt w/expr waiver of service
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Gwyn Shea, Texas Secretary of State % Ann McGeehan, Director of Elections P.O. Box 12060 Austin, Texas 78711-2060 Tel: (512) 463-5650 Fax: (512) 475-2811 E-mail: elections@sos.state.tx.us	REAL PARTY IN INTEREST	Served <u>07/26/2002</u> By: <input checked="" type="checkbox"/> U.S. Postal Service <input type="checkbox"/> Certified Mail <input type="checkbox"/> Commercial Delivery _____ <input type="checkbox"/> Electronic Facsimile (Telephonic Xmsn) <input type="checkbox"/> E-mail PDF fmt w/expr waiver of service
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R. Lance Flores

APPENDIX

Table of Appendices

Document Name	Apx. Tab
Notice of Claim of Ineligibility of Clifford Fuddy William transmitted to Geoffrey Neale on 05/07/02 at 13:24 CST by telephonic	A ▶ □
Copy – certified statement of license to practice law from John T. Adams, Clerk of The Supreme Court of Texas	B ▶ □
Copy – Temporary Injunction, <i>UPLC v. William</i> , No. 2002-01066 (270 TH Tex. Dist. Ct. Harris Co. 2002)	C ▶ □
Notice of Claim of Ineligibility of Clifford Fuddy William transmitted to Geoffrey Neale on 05/07/02 at 15:07 CST by Internet email	D ▶ □
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NO.

In the
Supreme Court of Texas













In re,
R. Lance Flores,
The Dallas Libertarian Post,
in the general public interest of the Texas Electorate,
Relator.

RECORD
IN SUPPORT OF PETITION FOR WRIT OF MANDAMUS

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Dallas, Texas 75227-5419
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Attorney for the Relator

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