



CITY OF SAN ANTONIO

MARC K. WHYTE
OFFICE OF CITY COUNCILMAN
DISTRICT 10

June 10, 2024

Debbie Racca-Sittre
City Clerk
City of San Antonio
P.O. Box 839966
San Antonio, Texas 78283-3966

**Re: Sworn Response to Complaint of Mr. Martin Phipps
Alleging Violations of City Code of Ethics**

Ms. Racca-Sittre:

I have at hand your correspondence dated May 29, 2024, along with a copy of the complaint filed by Mr. Martin Phipps, as well as a copy of the City Code of Ethics. Your correspondence indicates that Independent Counsel, Mr. Ross Fischer, has determined that based upon a review of Mr. Phipps' complaint alone this matter is eligible to proceed to the Ethics Review Board ("ERB") for a determination of whether my conduct at the time in question constituted a violation of certain provisions of the City's Code of Ethics. Based upon the following, I respectfully request that this matter be dismissed without delay.

CODE PROVISIONS AT ISSUE

Your correspondence indicates that the ERB will review the applicable facts to determine whether the following provisions may have been violated:

1. Section 2-43(a)(2)(Conflicts of Interest);
2. Section 2-44(a)(Unfair Advancement of Private Interest);
3. Section 2-47(c)(Prestige of Office and Improper Influence);
4. Section 2-49(Public Property and Resources).

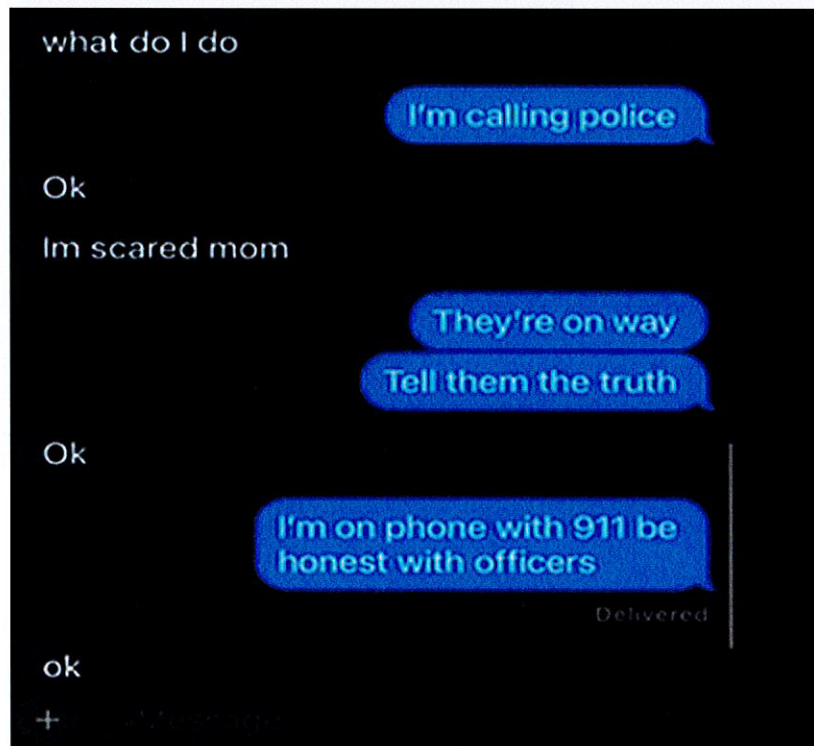
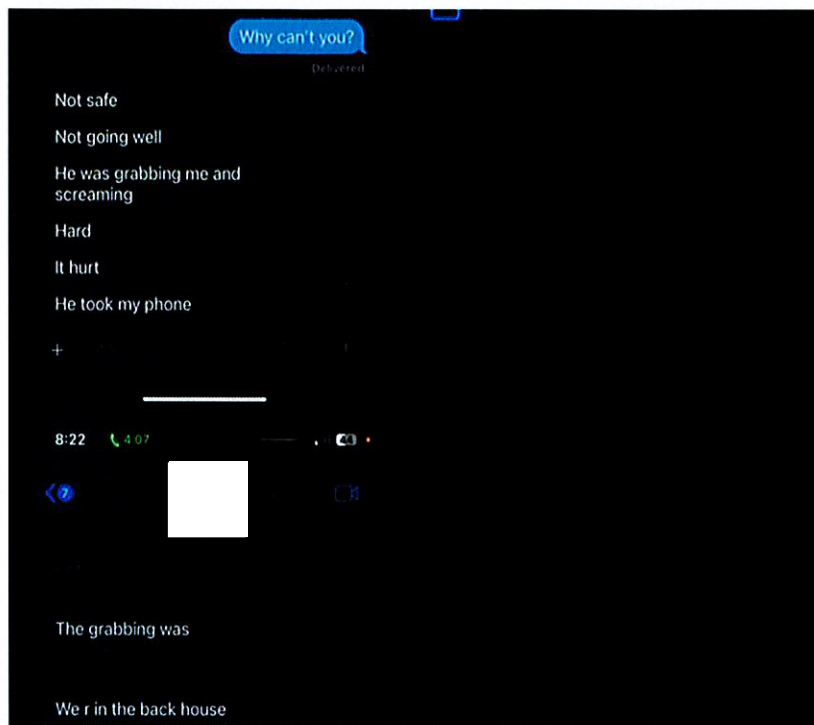
SUMMARY OF RESPONSE

It's "not safe."
It "hurt."
"I'm scared mom."

While I will address the facts and the provisions of the code in more detail in this letter, let me state the following in summary: My actions on the night of April 26th were taken for one reason only – out of concern for a young child. Based upon that concern, my conduct at the time in question consisted of my informing SAPD and Sheriff Javier Salazar of text messages that I received from my wife indicating that a female minor, a member of this community, may be in imminent physical danger. The text messages I received, which were

2024 JUN 10 PM 4:26:39
CITY CLERK
DEBBIE RACCA-SITTRE

between the child and her mother, are seen here:



The text messages came to me while I was attending an event in the King William district, along with Bexar County Sheriff Javier Salazar, and perhaps as many as two hundred other people. By the time I received the text messages, SAPD had already been dispatched to the house where the minor was based on a call to SAPD from the child's mother. Therefore, contrary to Mr. Phipps' accusation, I did not dispatch SAPD, nor did I demand that any course of action be taken. While at the event, I showed the text messages to Sheriff Salazar. The sheriff shared my concern and subsequently sent a deputy, who was standing nearby, to further investigate the matter. I had no further involvement. At all times material to this incident I acted only to relay my concerns for the well-being of a child and to provide information to appropriate authorities.

**MR. PHIPPS' PARTICULAR
ALLEGATIONS AND RESPONSE**

In the Complaint, Mr. Phipps makes numerous unsupported statements that are addressed here.

ALLEGATION	RESPONSE
<p>“Without any personal knowledge or good faith basis, Councilman Whyte made false, unsubstantiated accusations of child abuse against me to San Antonio Policy and Bexar County Sheriff’s officers and dispatched them to my home.”</p>	<p><u>Mr. Phipps is incorrect and there is no evidence of this.</u> I had a good faith basis for my actions: my wife forwarded me messages (as seen above) that she received from her friend, Jessica Joyner (Martin Phipps’ ex-wife and mother of the minor child involved). In the text message, the child relates that she had retreated to the “back house,” that “He was grabbing me and screaming,” “Hard,” “It hurt,” and stating, “I’m scared mom.” Taking no action after viewing this message was not an option for me.</p> <p>I initially attempted to call SAPD Chief McManus but got no response, so I sent him the text message from my wife. I then spoke with Councilman Manny Pelaez, who also was at the same event with me, and showed him the text messages. He informed me that he too found the text messages alarming and suggested that we visit with Sheriff Salazar who was at the event. Councilman Pelaez and I then spoke to Sheriff Salazar who informed us that he would dispatch a deputy to investigate.</p> <p>I did not suggest or insist upon this. I also never stated that child abuse was taking place, though I was concerned. I simply passed on the information I had. I did not use the influence of my office to force any action by the Sheriff (a county official). I do not have the authority to “dispatch” any peace officer as Mr. Phipps suggests in his complaint. Further, as will be shown below, SAPD had already been sent to the scene prior to me having any knowledge of the situation.</p>
<p>“Councilman Whyte acted at the request of my ex-wife, Jessica Joyner and his wife, Lorien Whyte, who is an attorney of record for Ms. Joyner in an ongoing custody dispute between me and Ms. Joyner.” Whyte’s actions were done to “advance Joyner’s legal strategy” and “affect the custody arbitration.”</p>	<p><u>Mr. Phipps is incorrect and there is no evidence of this.</u> Neither my wife nor Ms. Joyner asked me to do anything in this matter. My wife sent me the text message to see what, if anything, should be done to protect a child and prevent possible injury based upon the child’s text message. She also said that maybe the Police Chief should get involved. I told my wife that I</p>

	<p>would inform the proper authorities and they would investigate appropriately.</p> <p>My wife is not currently Ms. Joyner's attorney and was not on April 26th, the day of the incident. My wife assisted Ms. Joyner in late 2022 to mid-2023 on an appellate issue related to the Phipps-Joyner custody case, but that's it. She has not done any legal work for Ms. Joyner since mid-2023, as Ms. Joyner is in a family law, custody dispute in a private arbitration in which Ms. Joyner has a family law attorney – Jim Monnig. My wife, Lorien Whyte, is an appellate attorney and does not practice family law. Neither my wife nor I have any financial interest in the matter, and the same was true on April 26th. Nothing I did was to advance Ms. Joyner's legal strategy or affect the arbitration. My concern that night was for the safety of a minor child.</p>
<p>"Councilman Whyte inserted himself into a private, civil custody dispute in which his wife holds a financial interest for one of the parties."</p>	<p><u>Mr. Phipps is incorrect and there is no evidence of this.</u> My wife is not "attorney of record" for Ms. Joyner. While a in late 2022 through March 2023 she performed legal services for her as an appellate lawyer, my wife is not involved in the "ongoing custody dispute." The appellate issue was ruled upon and finished in August 2023. My wife does not have a financial interest in this custody dispute, nor did she on April 26th. All actions taken that evening were out of concern for the safety of a small girl.</p>
<p>"Councilman Whyte personally directed law enforcement to investigate or 'look carefully into' me....He directed law enforcement to remove my daughter from my home." Whyte did what he did to "harm my family."</p>	<p><u>Mr. Phipps is incorrect.</u> I never directed anyone to remove the child from the home, and nothing was done for the purpose of harming Phipps' family. I showed SAPD (via the text to Chief McManus) and BCSO (by physically holding my phone in front of Sheriff Salazar and his deputy) the text messages between the child and her mom, and I expressed my concern for the child and the desire to know that all was ok at the scene. Then, as Sheriff Salazar has stated, it was he who directed his deputy to go to the scene.</p>
<p>"Councilman Whyte bypassed normal channels and used his position and access to obtain a specific result not otherwise available to the public for the benefit of his wife and her client."</p>	<p><u>Mr. Phipps is incorrect.</u> My wife, Lorien Whyte, is a friend of Ms. Joyner and not her attorney. My action in this matter was not "for the benefit" of Ms. Joyner or my wife; rather, it was for the protection of a minor whose text message raised alarming issues.</p>

	<p>I obtained no specific result for anyone. Many members of the public who are not elected officials have access to Chief McManus,¹ and they are also free to access Sheriff Salazar or any law enforcement official they come into contact with. I alerted these authorities of a situation I deemed dangerous to a child.</p>
<p>“On information and belief, Councilman Whyte had been drinking and was intoxicated.”</p>	<p><u>Mr. Phipps is incorrect in his information as well as his beliefs.</u></p>
<p>Mr. Phipps provides his version of the contested custody dispute with his ex-wife. He incorporates his belief that I inserted myself into the incident in question in an attempt to assist my wife (based on the argument that my wife represents Ms. Joyner).</p>	<p><u>Mr. Phipps’ version is mistaken and self-serving.</u> I don’t know the details of the custody dispute, nor is that relevant here. Accordingly, I will limit my response to that section of Mr. Phipps’s complaint to the following. The fact that the courts or an arbitrator had prevented Mr. Phipps from seeing his children for the past 19 months has nothing to do with me or my wife. Whichever judge or arbitrator made that decision surely based it on the facts as presented. My wife and I have no involvement in that custody dispute.</p> <p>With that said, Mr. Phipps’ complaint is based on some fundamental misperceptions or misstatements: First, Phipps says that my wife represents his ex-wife. She does not. My wife is not a family law attorney. Mr. Jim Monnig represents Ms. Joyner. My wife did isolated briefing of appellate issues in the past, and the appellate matter was resolved in August 2023. She has no involvement in the current custody arbitration.</p> <p>Second, Phipps assumes that I inserted myself into this matter without a basis for my action or to help Ms. Joyner’s legal fight. This is incorrect. I acted out of concern for a minor child. I had text messages from the minor child that indicated she felt as though she was in danger. In fact, the minor even explained to SAPD the nature of her apprehensions when SAPD investigated – and the report is similar to what the text messages state. The police report states, “[The minor] stated that she felt unsafe while staying with Martin John Phipps.” “[The minor] stated that while she was having a panic attack, when [Martin John Phipps] picked her up by the arms and started shaking her. [The minor] stated that she was scared for</p>

¹ As some have pointed out, Chief McManus actually gives out his phone number to citizens at neighborhood meetings. His number is not something only elected officials have.

	staying the night in fear of retaliation from [Martin John Phipps].”
Whyte “represented to Ms. Joyner and her attorney” that he could “influence” SAPD or BCSO.”	<u>Phipps is incorrect and there is no evidence of this.</u> The affidavits attached hereto confirm that I never made such a statement.
Whyte “diverted SAPD personnel” and was the reason Officers Romo and Terrell were “called out.”	<u>Phipps is incorrect.</u> The evidence clearly shows Ms. Joyner calling the police at approximately 8:18 p.m. (picked up by police at 8:19 p.m., before I was even aware of the situation. The police report supports this. Her call was the reason SAPD was on the scene. I did not “divert” any SAPD personnel to the scene.

THE EVIDENCE

I attach the following in support of this Response:

- Exhibit A:** Text message between child and mom;
- Exhibit B:** Text message from me to Chief McManus;
- Exhibit C:** Affidavit of Councilman Manny Pelaez;
- Exhibit D:** Statement of Sheriff Salazar;
- Exhibit E:** Text message from Chief McManus to me;
- Exhibit F:** Affidavit from Jessica Joyner (child’s mom);
- Exhibit G:** Affidavit from Jim Monnig (Joyner’s attorney);
- Exhibit H:** Text message between me and Jessica Joyner;
- Exhibit I:** Public reports regarding Phipps;
- Exhibit J:** Letter from Family Violence Prevention Services, Inc. (Battered Women’s and Children’s Shelter) to Ethics Review Board; and
- Exhibit K:** Police Incident Detail Report.

WHAT ACTUALLY HAPPENED: A TIMELINE

On the evening of April 26th I was attending a Fiesta event in the King William district with Councilman Pelaez, Sheriff Salazar and many others. The event happened to be right around the corner from Mr. Phipps’ house. I attended that event by myself, as my wife was at home. The relevant events of that night are set forth in the timeline as follows:

- **8:05 – 8:22 p.m.** – texts between girl and Jessica Joyner (mother);²
 - You can see the time on the phone at the top – 8:22 p.m. You can also see at the top the icon showing that Ms. Joyner had been on the phone at that time for more than 4 minutes, and her text messages say she is on the phone with police. Per **Exhibits A and K**, it is clear Ms. Joyner gets on the phone with police at approximately **8:18 p.m.** – well before my wife or I knew anything was going on;
 - Per Mr. Phipps’ Complaint – Phipps states that the police arrived at his home at approximately 8:20 – see Phipps Complaint. Again, this was before I knew anything was going on and was based upon Ms. Joyner calling the police as noted above;

² See **Exhibits A and K**. On **Exhibit K**, the Police Incident Detail Report shows that Ms. Joyner made the call to police and it was picked up at 8:19 p.m.

- **Approximately 8:50 p.m.** – I see the text messages from my wife and I try to call Chief McManus at 8:53 p.m. When he doesn't answer, at **8:53 p.m.** I send him the text message sent to me by my wife that includes **Exhibit A**,³
- **At approximately 9 p.m.** I show the text messages in **Exhibit A** to Councilman Manny Pelaez.
 - Councilman Pelaez then walks me over to Sheriff Salazar and we show him the texts. Sheriff Salazar then takes us to his deputy and we showed him the texts.⁴ At that point the Sheriff ordered the deputy to go to the Phipps house.⁵
 - Again, the location at which Councilman Pelaez, Sheriff Salazar, his deputy and I were standing was just a few minute walk from the Phipps house, so the deputy was able to get there very quickly.
- Per Mr. Phipps' Complaint and the Police Report – the Sheriff's deputies arrived sometime later after SAPD was already there.
 - The police report states that the child stated that Phipps "picked her up by the arms and started shaking her...she was scared for staying the night in fear of retaliation" from Phipps...and that she was "afraid to go back inside" the residence without her phone.
 - Note that what the child told the police is similar to what she told her mother in the text messages that had been sent to me that evening. *Compare* police report with **Exhibit A**. In Phipps' complaint, however, he claims that what his daughter told the police was not truthful.
- **Shortly before 9:30 p.m.** I spoke with Deputy Chief Salame of SAPD and was told that police had been dispatched to the scene earlier in the evening based upon Ms. Joyner's call; at this time I also texted Jessica Joyner to let her know we were trying to get information on the matter⁶;
- At **10:09 p.m.** the Chief of Police responds to my texts saying that he just saw my text from earlier and that the scene of the incident was cleared at 9:46 p.m. As I was still concerned for the girl, I responded that I could not believe the police left the scene and that I hoped nothing happened to the girl.⁷
- Regarding Mr. Phipps' statements that at some point in time I told Ms. Joyner or her lawyer that I could influence SAPD or make something happen in Ms. Joyner's favor, that is false. I have never made such a statement to them or anyone.⁸

MR. PHIPPS' REPORTED HISTORY

I attach to this Response various public filings (with the EEOC) and news articles related to Mr. Phipps from the past few years, including a letter and email signed and

³ See **Exhibit B**.

⁴ I believe there is some confusion in Phipps' Complaint over whether I sent a text message to BCSO. I did not send a text message to anyone with the Bexar County Sheriff's Office. Rather, and as stated here in, I was standing at an event with Sheriff Salazar and one of his deputies. Thus, I physically held my phone in front of them to show them the text messages from the child to her mother.

⁵ See **Exhibits C and D**.

⁶ See **Exhibit H**. It should be noted on Exhibit H that Ms. Joyner responded to me with the text messages between she and her daughter. This shows that she did not even know that my wife had sent those to me earlier in the evening – which supports the fact that she never asked me to do anything. My wife sent me the text messages out of concern for the child.

⁷ See **Exhibit E**.

⁸ See **Exhibits F and G**.

authored by various former employees of Phipps. These are not attached to attack Mr. Phipps' character, but rather to note why I had a heightened concern for the child in question.

My actions on the night of April 26th were solely based on my concern for the girl in question. No matter who was involved, once I received the text messages from the [redacted] to the mother I was going act as, to me, the child was representing that she was in danger. ***Imagine if someone seeing those texts did nothing, and then something terrible occurred.***

With that said, the relevance of these attachments is that people close to Mr. Phipps have, in the past, feared he may be violent. This volatile history certainly added to the urgency of the situation on April 26th.⁹

RESPONSE TO ETHICS CODE ALLEGATIONS

The following addresses why my actions on April 26th did not violate the Ethics Code provisions in issue.

(1) Section 2-43(a)(2).

This provision of the ethics code states that a city official shall not take action that is likely to affect the **"economic interests"** of the official's...spouse. My actions on April 26th did not affect the economic interest of my wife as she is making no money on the Phipps-Joyner custody arbitration, she was making no money on the arbitration on the night of April 26th, and there is no evidence otherwise. My wife does appellate work, and her small work on this matter (a technical appellate point) ended in August 2023. The custody case between Mr. Phipps and Ms. Joyner is subject to a private arbitration. Ms. Joyner has a family law attorney handling that and my wife has no economic interest in the case.¹⁰

For those reasons, there was no violation of this provision of the Ethics Code.

(2) Section 2-44(a).

Phipps claims I violated this provision of the Ethics Code because in his opinion I used my position as a Council Member to "impede" his "interest in a private custody dispute" and "unfairly secured" for Ms. Joyner and her attorneys' an **"advantage"** not **"lawfully"** available to others. He then claims that I "represented to Ms. Joyner and her attorneys' that I could provide them this advantage."

First – I again note that I have never even had a call with Mr. Monnig on this matter, and not one time have I ever represented to him or Ms. Joyner or my wife that I could get them any advantage in the custody dispute. There is no evidence of that, and the sworn affidavits of Ms. Joyner and her attorney, Mr. Monnig, refute the allegations.¹¹

Second – a review of the timeline is important. As can be seen from the text message above, in addition to the police report attached to the Complaint, Ms.

⁹ See **Exhibit I**. Additionally, it should be noted in these materials that Phipps' former employees discuss his desire to retaliate or seek revenge when things happen he does not like. As the Family Violence Prevention group notes in its' letter – this complaint was simply made out of retaliation and in an attempt to hurt me. See **Exhibit I**.

¹⁰ See **Exhibits F and G**.

¹¹ See **Exhibits F and G**.

Joyner was on the phone with police prior to 8:22 p.m. (note the icon at the top of the text message showing that she had been on the phone for 4 minutes at 8:22 p.m., and in the text message she says she's "calling the police" and that they are "on way"). The police report also shows the event started at 8:20 p.m. (top right corner) – which was before I was contacted by my wife and knew that anything was going on. I first contacted the police, via a text to Chief McManus, at 8:53 p.m. per my text message to him that I have attached hereto. Thus – I secured no advantage for Ms. Joyner as she got the police to the scene on her own.¹²

Finally – with regard to BCSO, I was at an event with more than 200 people. **Any person, whether they are a councilperson or not, is always free to go up to a police officer or the Sheriff or a sheriff deputy and notify them of an ongoing situation the person deems to be dangerous to a child.** In fact – everyone has a responsibility to do that. Sheriff Salazar was attending the party just like every other guest. Councilman Pelaez and I went up to the Sheriff and showed him the text message. **Access to Sheriff Salazar was "lawful" for us just like it would have been "lawful" for any other person.** After we showed Sheriff Salazar the text message, he made the decision to take us to his deputy and authorized the deputy to go around the corner to Mr. Phipps' home to see if everything was ok.¹³ For those reasons, there was no violation of this provision of the Ethics Code.

(3) Section 2-47(c).

This section deals with "**representation**" of someone "**before the City**" as defined by the Code. This section contemplates representing a private person before City Council, a City Department or City Employee, etc. In that context, an official may not "**assert the prestige**" of the official's position for the purpose of advancing private interests or state or imply that he/she can influence city action on any basis other than the merits.

First – Phipps again states that "on information and belief" I represented to someone (I assume he means Ms. Joyner and her attorney) that I could influence SAPD or BCSO. Phipps has no evidence for this statement, and simply put – I never made such a representation and Ms. Joyner and her attorney confirm this.¹⁴

Second – Phipps states that I used the prestige of my position to advance Ms. Joyner's "legal strategy" and to influence the outcome of an ongoing custody dispute. I was not "representing" Ms. Joyner "before the city" on the night of April 26th. I received, from my wife (a friend of Ms. Joyner), the text message above wherein a 13 year-old girl was crying out for help. I passed the information on to law enforcement as quickly as possible in order to notify them, find out what was happening, and then to ask law enforcement to ensure everything was ok. In no way did I try and convey to anyone – nor is there any evidence – that (a) used the "prestige" of my office and told anyone that because I'm a City Councilman they

¹² A technical point should also be noted here. It is not "unlawful" for someone to have the Chief of Police's phone number. I have no doubt he has friends, family, co-workers and others he has come into contact with that have his number, and as stated above – he actually gives his number to members of the public at neighborhood meetings. In fact – the majority of people that have his number are not elected officials. So even if my notifying the Chief of what was going on would have been the reason the police went out (which it clearly wasn't), that still would not amount to a violation of this ethics code provision as I did not do something that was "unlawful" for a non-elected person to do, nor did I gain an "advantage" for anyone.

¹³ See Exhibit D.

¹⁴ See Exhibits F and G.

need to listen to me and take action or (b) that the actions I took were to advance Ms. Joyner's "legal strategy." I presented the facts as I knew them, and Sheriff Salazar agreed and thus ordered his deputy to check on the Phipps' home.¹⁵ I don't know Ms. Joyner's "legal strategy" and was not trying to influence the custody matter. My concern that evening was for the child's safety, and I acted as I believe anyone else would.

For those reasons, there was no violation of this provision of the Ethics Code.

(4) Section 2-49.

This section prohibits an official from using "City personnel" for private purposes except when the resources are "lawfully" available to the public.

First, it must be stated that I did not use any City of San Antonio personnel that night. As noted above – before I was even made aware of the situation the SAPD officers went to the Phipps house because Ms. Joyner made the call after receiving the text messages from her daughter. Even if I had asked SAPD to go to the scene, which I didn't, a violation of this provision still would not have occurred as it is lawful for any member of the public to call 911 or ask an officer, even the Chief of Police, to check on a disturbance when a member of the public (in this case a minor child) is in danger. Nothing done that night was done for a "private purpose"; rather, everything was done in an attempt to ensure a child, a member of our community, was not being harmed.

Regarding BCSO – Councilman Pelaez and I going to talk to Sheriff Salazar was something any member of the public could have lawfully done. Further, Bexar County Sheriff's deputies are not "City of San Antonio personnel" – so this section of the Code would not apply to that action.

For those reasons, there was no violation of this provision of the Ethics Code.

TEXAS LAW

Texas Family Code Chapter 261.101 states in pertinent part as follows:

- (a) A person having reasonable cause to believe that a child's physical or mental health or welfare has been adversely affected by abuse or neglect by any person shall immediately make a report as provided by this subchapter.
- (b) If a professional has reasonable cause to believe that a child has been abused or neglected or may be abused or neglected...the professional shall make a report not later than the 48th hour after the hour the professional first has reasonable cause to believe that the child has been or may be abused or neglected or is a victim of an offense under Section 21.11 (Indecency with a Child), Penal Code...In this subsection, "professional" means an individual who is licensed or certified by the state or who is an employee of a facility licensed, certified, or operated by the state and who, in the normal course of official duties or duties for which a license or certification is required, has direct contact with children...

As Councilman Pelaez notes in his sworn statement attached hereto, he and I – as

¹⁵ See Exhibit D.

people and as professionals, had a duty to immediately report the situation involving this 13 year old child on the night of April 26th.¹⁶

Additionally, and as the letter from Family Violence Preventions Services notes, all people have an "obligation to report reasonable suspicions that a child...is in imminent danger."¹⁷

Regardless of the outcome, the text messages above showed that a child may be in danger. No chances should ever be taken when it comes to protecting children, and that is why this law is in place. I did as I was required that night, and as I believe any other person would do.

CONCLUSION


What if I would have done nothing when I received that text message and something had happened to that child?

When I received the text messages set forth at the beginning of this Response, I knew it would be irresponsible not to act – and act as quickly as possible to ensure the child was safe. I first tried to obtain information from SAPD about the status of the situation and notify the police as soon as possible. After that, I consulted Councilman Pelaez about what we should do next. We both agreed we needed to do something, so we showed Sheriff Salazar, who was standing just a few feet away from us, the text messages in issue. The Sheriff, finding merit in our concern, then took us to his deputy and authorized him to go to the scene (which was just around the corner from where we were) to check on the status of events. When they got there, SAPD was already on the scene due to Ms. Joyner having called the police earlier in the evening before I knew anything about the situation.

Yes – I am a City Councilman, but I am also a citizen, member of this community and a father of two daughters. But being a Councilman did not influence any of my actions that night, nor did I try to use that fact to obtain any benefit for Ms. Joyner. **Being a City Councilman should not prevent me from taking any action necessary to check on the safety of a child as quickly as possible.** I acted as I believe any other person would, as Texas law requires, and in an effort to protect a small child from potential child abuse.

Thank you for your consideration of this Response. I respectfully request that the Complaint filed by Mr. Phipps be dismissed in its entirety.

Sincerely,



Marc K. Whyte

¹⁶ See Exhibit C.

¹⁷ See Exhibit J.

EXHIBIT A

Lorien >

I just did

Ok



Why can't you?

Delivered

Not safe

Not going well

He was grabbing me and screaming

Hard

It hurt

He took my phone

+

8:22

+07



?

The grabbing was

We r in the back house

what do I do

I'm calling police



Ok

Im scared mom

They're on way

Tell them the truth

Ok

I'm on phone with 911 be honest with officers

Delivered

ok

+

You have to impart on him how serious this is Martin

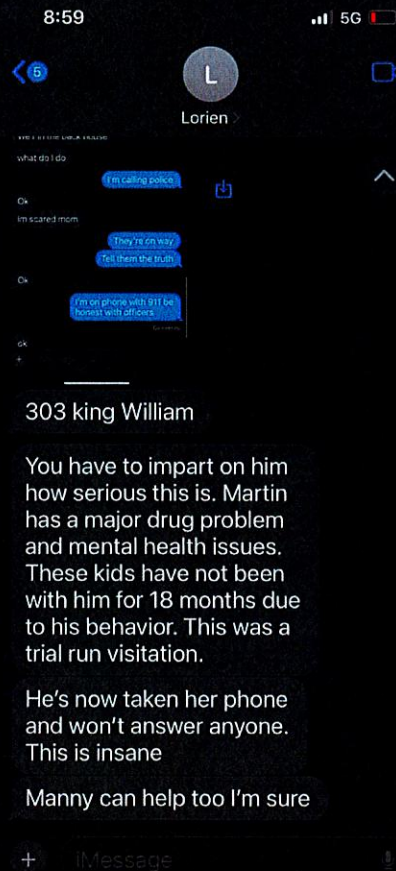


EXHIBIT B

To: Chief Mcmanus

Fri, Apr 26 at 8:53 PM

Can you call me?



Fri, Apr 26 at 10:09 PM

Marc - iust saw your text. I

EXHIBIT C

AFFIDAVIT OF MANNY PELAEZ

STATE OF TEXAS

§

§

COUNTY OF BEXAR

§

Comes now, MANUEL PELAEZ-PRADA, affiant. Affiant testifies as follows:

1. "I am over 18 years of age and have never been convicted of a crime. I am the District 8 City Councilman. I am competent to make this affidavit, and everything stated herein is true and correct.
2. On the night of April 26th of this year I attended a Fiesta event in the King William district. Councilman Marc Whyte, Sheriff Javier Salazar, and various other officials were also in attendance.
3. At some point around 9:00 p.m., Councilman Whyte approached me and showed me a text message exchange between Jessica Joyner and her daughter, a minor.
4. Upon reading the text messages it was clear to me that Councilman Whyte and I had sufficient information to reasonably believe that the child was in danger of substantial harm or had already been substantially harmed. and that it was necessary to immediately alert law enforcement.
5. Accordingly, I took Marc over to Sheriff Salazar who was standing a few feet away from us. We informed the Sheriff of the information about our reasonable suspicions, the child, the address where the child was located, and the name of the individual responsible for the care/custody of the child.
6. The Sheriff immediately walked us over to one of his deputies and he instructed the deputy to go to the address to check on the child.
7. The event we were attending was two blocks away from where the child was located; only few minutes' walk from 303 Kings Way. Bringing this to the attention of the Sheriff who was standing next to us at the event was the quickest and most efficient way to get the information into the hands of law enforcement.
8. Councilman Whyte and I are licensed attorneys. The Texas Family Code Sec. 261.101 obligates attorneys licensed by the state of Texas to immediately alert law enforcement when that attorney has reasonable cause to believe that the child is

in danger of substantial harm or has already been substantially harmed. Had we not immediately reported the information we reported to the Sherriff, we would have been violating our affirmative duty imposed by Texas law.

FURTHER AFFIANT SAYETH NOT.



MANUEL PELAEZ-PRADA

JURAT

"My name is Manuel Pelaez-Prada my date of birth is _____ and my address is _____
San Antonio, Texas. I declare under penalty of perjury that the
foregoing is true and correct. Executed in Bexar County, State of Texas on the 23 day of May,
2024

EXHIBIT D

“While I was at a private party, I was approached by Councilmen Pelaez and Whyte. Councilman Pelaez indicated to me there was some sort of disturbance several doors down from the party at a private residence owned by Mr. Martin Phipps. I flagged down one of my deputies, who was working an extra job nearby on the street and asked him to go check it out. The deputy went down the street before returning a few minutes later and informed me that SAPD officers were already on scene and handling the situation. He indicated to me it was not much of a disturbance by the time he arrived. No further action was taken.”

Sheriff Javier Salazar

EXHIBIT E

New iMessage

Cancel

To: Chief Mcmanus

He's now taken her phone
and won't answer anyone.
This is insane

Manny can help too I'm sure

Fri, Apr 26 at 10:09 PM

Marc - just saw your text. I followed up with dispatch. Two officers were on the scene and cleared at 2146 hours and the reporting officer will prepare an info report.

Chief - I really hope something doesn't happen

I can't believe your guys left

Tried you back

I'm here

EXHIBIT F

AFFIDAVIT OF JESSICA JOYNER

STATE OF TEXAS

§

COUNTY OF BEXAR

§

§

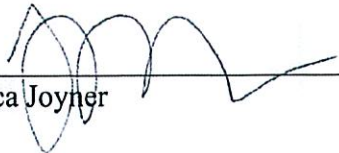
Before me, the undersigned notary, on this day, personally appeared Jessica Joyner, a person whose identity is known to me. After I administered an oath to affiant, upon her oath, affiant testified:

1. "I am over 18 years of age and have never been convicted of a crime. I am competent to make this affidavit, and everything stated herein is true and correct.
2. At no time has Marc Whyte or his wife Lorien ever represented to me that Marc could gain special treatment for me in my custody dispute with Martin Phipps based upon his position as a city councilman. Nor have I ever asked Marc or Lorien to do so.
3. Lorien has been a friend of mine for some years. I also have known her to be an especially competent appellate attorney. At the end of 2022, prior to Marc having been elected to city council, I engaged Lorien to help me on an appellate issue related to my custody dispute that was to be heard by the appellate court here in San Antonio. Lorien prepared and filed my appellate brief in February of 2023, and the appellate proceeding concluded in August of 2023. Lorien did this appellate work for me for a flat fee paid in June of 2023. Since that time, she has not performed any work that has led to additional compensation being due. Lorien has not been an attorney of record other than in the appellate court, and since August of 2023 the custody dispute has been in arbitration and I have a family law litigator, Jim Monnig, who is representing me. Mr. Phipps makes gross misrepresentations about the custody dispute, but a thorough response to his misstatements is not appropriate here.
4. As for the night of April 26, 2024, that was the first night that my children had been permitted to spend with Martin in more than 18 months due to court rulings temporarily removing his possession and access to the children. As soon as he obtained possession, he turned my daughter's phone off. I was in Houston and Martin was ordered by the arbitrator to bring the children to the volleyball tournament in Houston, but he never arrived. That evening at a little past 8 p.m., I got text messages from my 13 year-old daughter from her computer that it was not safe to call, Martin was grabbing her hard and screaming, she was scared, and she did not know what to do. I immediately called the non-emergency line of the SAPD and requested the police go to the scene immediately.
5. After I called the police and spoke with them, I tried to reach my lawyer Jim Monnig, but he did not answer. Concerned about what was happening to my daughter, I sent a screen shot of my daughter's texts to Lorien. At no time did I ever

ask Lorien to contact Marc about the situation or to get Marc involved. The police asked me for Martin's phone number and Martin's mom's phone number and they called both repeatedly with no answer. I also gave them my daughter's phone number, but they could not reach her because her phone was turned off. Lorien told me that she was trying to reach Marc to see what if anything else we should do, but he was at an event and she could not reach him. Later that evening Marc texted me that he was trying to help, and I responded by sending him my daughter's text messages. I never asked Marc to take any action.

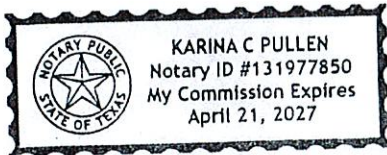
6. Based upon Martin's actions in the past, all of which are the subject of the custody dispute referenced above, as any mom would be I was terribly frightened for my daughter after I received her text messages on that night. My daughter is not one to exaggerate or make things up. That was the reason I called the police and asked them to go to the scene to make sure she was ok."


FURTHER AFFIANT SAYETH NOT.



Jessica Joyner

SWORN TO and SUBSCRIBED before me by Jessica Joyner on this 24 day of May 2024.





Notary Public, State of Texas

EXHIBIT C

AFFIDAVIT OF JAMES E. MONNIG

STATE OF TEXAS §

COUNTY OF BEXAR §

Before me, the undersigned notary, on this day, personally appeared James E. Monnig, a person whose identity is known to me. After I administered an oath to affiant, upon his oath, affiant testified:

1. "I am over 18 years of age and have never been convicted of a crime other than traffic tickets. I am competent to make this affidavit, and everything stated herein is true and correct.
2. At no point has Marc Whyte or his wife Lorien Whyte ever represented to me that Marc could do anything to benefit Jessica Joyner's side of the custody case against Martin Phipps based upon him being a city councilman.
3. I have not at any time spoken with Marc Whyte about this case, including on the night of April 26, 2024.
4. During my work for Jessica Joyner in her divorce and custody dispute, I have never billed Jessica for any communications with Marc. In fact, I haven't ever communicated with Marc about the case. In the event there is a billing entry noting a "Mr. Whyte" – that was simply a typo made by my office as it should have read "Ms. Whyte." That was the same day I spoke with Ms. Whyte regarding appellate issues related to arbitration that were eventually concluded in August 2023."

FURTHER AFFIANT SAYETH NOT.



James E. Monnig

SWORN TO and SUBSCRIBED before me by James E. Monnig on this 24th day of May 2024.




Notary Public, State of Texas



EXHIBIT H

3:33

SOS  

New iMessage

Cancel

To: Jessica Phipps

Fri, Apr 26 at 9:26 PM

We are on this

Delivered

Message from Jessica Phipps
* I'm not sure if you're still in the area
* I'm not sure if you're still in the area

Message from Jessica Phipps
tell dad its time to call I cant

I just did

Ok

Why cant you?

Not safe

Not going well

He was grabbed and was
screaming

hard The grabbing was



We r in the back house

what do I do

run calling police

Ok

Im scared mom

they're on way

tell them the truth

Ok

im on phone with 911 bc



iMessage



EXHIBIT I

Dear Martin:

We write this as a collective response to your January 7, 2020 email. We are writing out of concern for the long-term viability of the firm and a grave concern about your mental state. We all intend to honor the confidentiality clauses we signed. We hope that you will seek help. Nevertheless, mental health issues do not excuse a hostile work environment. As recent national events have underscored, silence and inaction on this subject amount to complicity.

Many of the signatories of this letter feel a sense of loyalty toward you. However, as you eloquently stated on January 7th, "I am not your friend." We write this with concern about our financial situation and our physical safety, given your record of acting aggressively to seek retribution and your persistent display of homicidal fantasy.

We collectively believe that the environment at the firm is hostile and abusive, that this is a pervasive and consistent problem, that it has not been addressed, and that it has a negative impact on the ability of firm personnel to fulfill their job functions. This issue has been growing over a period of years and has accelerated in recent months. This must change immediately.

We have observed the following personality traits over a period of time, and have further observed that they are escalating at a rapid pace: grandiosity, lack of empathy or remorse, delusions, Machiavellianism, a willingness and tendency to exaggerate and make misstatements of fact, an unfounded belief in conspiracies, a disregard for ethical canons and moral conventions, recklessness, impulsive decision-making, hostile aggression, sadism, misogyny, a propensity to discuss wildly inappropriate topics, and an insatiable desire for revenge.

You have made the following claims about former employees, partners and co-counsels:

- 1) they committed fraud;
- 2) they are sociopaths;
- 3) they are incompetent;
- 4) they are lazy; and
- 5) their personal lives are full of failure related to substance abuse, mental health or sexual misconduct.

You will likely make the same claims about us and use those claims to justify various lawsuits. It strains credulity that all people you encounter share these traits, so it leads to the conclusion that these claims are merely a projection.

The firm is managed by your authoritarian hand, with you controlling all litigation and management decisions. Without a significant course correction, we believe that the firm will not be equipped to handle complex litigation. You have blamed past challenges in various cases as a function of our incompetence or indifference. While there is plenty of blame to go around for any mistakes that have occurred, your unwillingness to take any responsibility for your leadership failures has prevented the firm from reaching its potential.

While we will not tolerate defamatory statements and insinuations about us, the signatories of this letter fully intend to honor the employment manual confidentiality clauses we all signed.

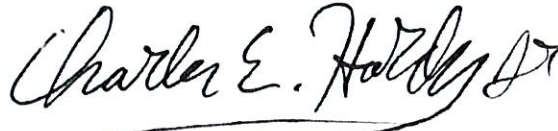
We all share concerns about your mental health status. Many of us are concerned that you may be an immediate danger to yourself or others. We hope you will seek the help you need.

We demand immediate measures to cure the hostile work environment.

Sincerely,



T.J. Meyer, 1/8/2021




Chase Hardy 1/8/2021



Lorianne Martinez 1/8/2021

~~Robert Vargas~~ 1/8/21

Meagan Telford
Meagan Telford 1/8/2021



Robert
Vargas
III 1/8/21

From: TJ Mayes <tjmayes@phippsmayes.com>

Date: January 11, 2021 at 9:03:32 AM CST

To: "Martin J. Phipps" <mhipps@phippsmayes.com> **Cc:** Giuseppe Schinaia <GSchinaia@phippsmayes.com>

Subject: My Resignation, Effective Immediately

Martin,

On January 9th you called me to inform me that in excess of \$30 million was coming in this week from the corn case and that you intended to "pilfer 4 or 5 million" in what is apparently a scheme to defraud your creditors. I don't believe the money is actually coming this week but do believe that you intend to defraud your creditors when it does.

You used the plural "we" when discussing your plans, which leads me to believe that you intend to implicate me somehow. Last week on multiple occasions you stated your intention to lie to the associates about how much money you would pay them.

Given that I do not have- nor have I ever had- access to or management of firm accounting or financial documents, I do not feel comfortable continuing to work with you when I am under the impression that there is a likelihood that you will implicate me in your fraudulent conduct.

Last week you asked me to conspire with elected officials to destroy public documents in relation to the annulment of your marriage with Brenda. I observed a troubling pattern of psychological abuse in your relationship with her, and I further suspect that you may have physically assaulted her. This suspicion is informed by multiple instances in which you gleefully expressed a willingness to assault her physically. I will testify to this if you contact her, approach her, or threaten her in any way.

Please accept this email as my resignation effective immediately.

I waited until this morning to submit it because you were with your children this weekend and I was concerned about the impact of this resignation on their physical safety and emotional well-being given your erratic behavior.

Due to your tendency to make false claims about and file civil suits against former employees, I have engaged multiple attorneys. Please refrain from contacting me. My legal team will notify you who you are to contact in the event that you seek legal action.

I do not intend to seek legal action against you. I will not hesitate to take any and all legal measures at my disposal to defend myself in one of your frivolous lawsuits or to defend my reputation against your rampant lies.

I do not want your money or to harm you in any way. I merely want your malignant presence removed from my life completely and irrevocably.

If you are planning on pursuing legal action against me, please be advised that I will tell the entire truth in any such proceeding, even if that truth is sometimes embarrassing to me. I keep contemporaneous notes of meetings and conversations, so telling the complete truth will not be as difficult for me as it tends to be for you. I will immediately request your deposition in relation to any legal action that you may seek against me.

If communication between me and the firm is necessary to handle outstanding issues, I will only communicate with Mikayla, Sandra, Meagan, Paola or Samantha. I will not communicate with the firm if you retaliate against any of your employees with violence, threats of violence, pay cuts, termination, threats of pay cuts, threats of termination, or threats of legal action. If I learn that your rapidly escalating pattern of hostile, abusive and misogynistic behavior continues, I will contact law enforcement.

I will not seek to actively harm you or the firm in any way.

I have struggled with [REDACTED] in the past. You know why. You knew this and actively sought to derail my recovery. You stated on multiple occasions that any success that you have in your schemes to exploit another person's personal challenges gives you leverage over that person that you gleefully intend to exploit for financial gain or in your endless quest for revenge. This is the moral equivalent- indeed, worse- of the conduct of the pharmaceutical companies in the opioid case.

I blocked your number on my phone. Please do not contact, approach or harass me or my family. If you do, I will have no choice but to call law enforcement.

While the Phipps Mayes PLLC entity may have been formed in some manner last year, I never signed any papers regarding its formation or viewed any financial documents. Any signature of mine on any such document is a forgery. Any suggestion that I had access to accounting documents is a lie. Please cease and desist from conducting business under my name.

In March 2020, in response to a liquidity crisis arising from the pandemic and precipitated by your atrocious financial management, I agreed to take a voluntary salary reduction to help the firm meet payroll. You may recall that you intended to lay off employees, and I insisted on voluntary salary reductions in lieu of layoffs. According to an accounting department spreadsheet I viewed last week but did not have control over, I am owed roughly \$50,000 arising out of that arrangement. I do not want it. I hope- for the sake of your children- that you use it to immediately seek intensive inpatient treatment for your [REDACTED] disorder.

Please seek help immediately. I know from experience that it brings peace that I believe you desperately need.

When I joined the firm two years ago, I hoped we would do something great for Bexar County taxpayers. The prospect of helping thousands of our neighbors who are suffering kept me at the firm for a long time against my better judgment. I now believe that staying will only help facilitate your endless capacity for self-destruction. My association with you is a stain from my record that I wish I could erase.

I am deactivating my firm phone immediately. I will return my key fob/firm phone/gate opener via courier or to Paola, Samantha or Sandra at a SAPD Safe Exchange Zone.

Please seek help immediately and refrain from violence. TJ

San Antonio

Law Firm Leading Bexar Opioid Suit Loses Partner, Employees Who Claim Abuse

Texas Public Radio | By Paul Flahive

Published January 28, 2021 at 6:20 PM CST



Martin Phipps Speaks in front of the Bexar County Courthouse about the Opioid litigation.

One of the law firms handling Bexar County's billion dollar lawsuit against opioid manufacturers is in uproar after several employees resigned, citing a hostile work environment and abuses from director Martin Phipps.

Phipps runs the law firm Phipps Deacon and Purnell, which at times does business as Phipps Mayes. Accusations about Phipps' integrity and treatment of women emerged on Twitter from TJ Mayes, a former partner at the firm.

"I resigned from the Phipps firm after I became convinced without a shred of a doubt that Martin Phipps is a crook and a serial abuser of women," Mayes tweeted Wednesday morning.

ⓘ
Not found

For now, I am focusing on hosting "On the Record" on @klrn; serving on the boards of @PortSanAntonio, @claritycgc & San Antonio Medical Foundation; and, chairing the Economic Development Council of @sachamber.

Still looking for a day job, but trying to decompress for a while.

— T.J. Mayes (@tj_mayes_) January 27, 2021

The law firm denied the claims.

"Unfortunately, social media gives anyone the platform to spew unfounded libelous accusations," said Gabe Ortiz, another lawyer for the firm speaking on its behalf.

In a complaint addressed to the U.S. Equal Employment Opportunity Commission (EEOC) obtained by TPR, Mayes and others called the workplace "hostile" and "abusive."

"We deal in high stakes, high stress litigation," said Ortiz, referencing the county's opioid lawsuit.

Mayes said in the letter that law enforcement officials had audio recordings proving that "Martin Phipps believes in his 'duty to kill' those persons whom he believes have wronged them (sic)."

The EEOC complaint included a letter to Phipps signed by six employees that pointed out more than a dozen "personality traits," including "misogyny" and "sadism."

"This issue has been growing over a period of years and has accelerated in recent months. This must change," said the letter.

January 19, 2021

U.S. Equal Employment Opportunity Commission
San Antonio Field Office
Legacy Oaks, Building A
5410 Fredericksburg Road, Suite 200
San Antonio, TX 78229

RE: Martin Phipps and His Entities

Meagan Talafuse was among the employees who signed the letter.

"Martin Phipps stated to me on multiple occasions his intention to kill Ms. Talafuse," said Mayes in the EEOC complaint. A statement that was corroborated by another former employee.

Talafuse remains at the law firm. TPR could not reach her for comment.

Nearly everyone who signed the letter immediately resigned when it was delivered on Jan. 11.

State Rep. Diego Bernal's law firm had a relationship with the firm. He confirmed that the relationship ended around that time.

"I've never felt threatened," said Ortiz.

Ortiz – who has been with the firm for five years – admitted he was a hard person to offend but said the Martin Phipps described in the letter was unrecognizable. Ortiz said he couldn't speculate on the motivations of those who left.

Mayes, a former chief of staff to Bexar County Judge Nelson Wolff, confirmed he sent the EEOC complaint dated Jan 19. Mayes declined to comment further, referring TPR to his lawyer.

He joined the firm two years ago. Phipps and he reportedly formed Phipps Mayes in August 2020.

In his resignation letter to the firm, Mayes said that Phipps was trying to defraud his creditors, and conspiring to destroy public documents related to his flash marriage to employee Brenda Vega. The marriage was annulled shortly thereafter. Mayes said – in his resignation – he observed Phipps psychologically abusing Vega.

Ortiz confirmed that Vega no longer worked for the firm but said he had never witnessed any abuse.

[The opioid lawsuit is against several dozen companies](#) including Perdue Pharma, maker of OxyContin, for practices that may have encouraged the opioid epidemic that claimed several hundred lives in San Antonio. The city was not a party to the county's suit.

It wasn't clear if Phipps' firm would continue to handle the opioid litigation for the county.

"We've all heard the allegations," Wolff said. He explained that the civil attorney with the Bexar County District Attorney's office was reviewing the situation, and so far believes they are "only allegations."

When TPR asked Wolff if the county would continue to use the firm, he responded, "I don't know what will happen."

"For two years, this firm has devoted millions of dollars and thousands of man hours to do what is right by the citizens of Bexar County and hold the multibillion dollar pharmaceutical companies accountable for the harm they have caused," Ortiz explained.

"The individuals who departed had no litigation experience and were not part of the trial team that we've assembled," he added.

Ortiz said he wished Mayes and others could have sorted out the problems of the firm in private.

Phipps' firm isn't the only one representing the county in the matter. Mikal Watts of Watts Guerra also represents the county.

According to Wolff, the trial date is currently a year away. That date has been pushed back at least two times already. It was filed in 2018.

In December, the San Antonio *Express-News* reported that Watts' firm and Phipps' disagreed on the path forward with the case. Watts had signed on to a potential settlement with Texas Attorney General Ken Paxton that would have given the county an estimated \$7 million. Phipps' firm reportedly wanted to hold out for more.

This was the second time in three years that Phipps saw high-profile departures by legal colleagues. In September 2019, Daniel Griffin and Simon Purnell departed the firm. Phipps reportedly sued a former employee, Jason Reichl, along with three others accusing them of stealing more than \$12 million from the firm.

Ortiz said the industry as a whole normally sees high turnover.

The letter from the departing lawyers to Phipps referenced the firm's financial strain. Phipps was sued for in federal court over the ownership of a Gulfstream Jet G-IV that he bought with this company R.A.S.H. and leased to his then law firm Phipps Anderson Deacon.

"R.A.S.H. and Phipps are currently in payment arrears for three (3) full months of payments in the amount of \$187,122.15," said lawyers for PNC Equipment Financial in court documents.

PNC financed the purchase of the \$3.4 million jet. The bank says it's owed \$1.7 million for the default.

According to the law firm, the debt has been resolved and the jet was sold.

It was around the time of the lawsuit that Mayes referred in his resignation letter to a voluntary pay cut that he and other staff took. The pay cut was verified by other former employees.

According to the letter to Phipps, his former employees were worried about his mental health and that he could be a threat to himself and others. Two other former employees TPR spoke to echoed those concerns.

Ortiz reiterated that this wasn't what he observed at the firm.

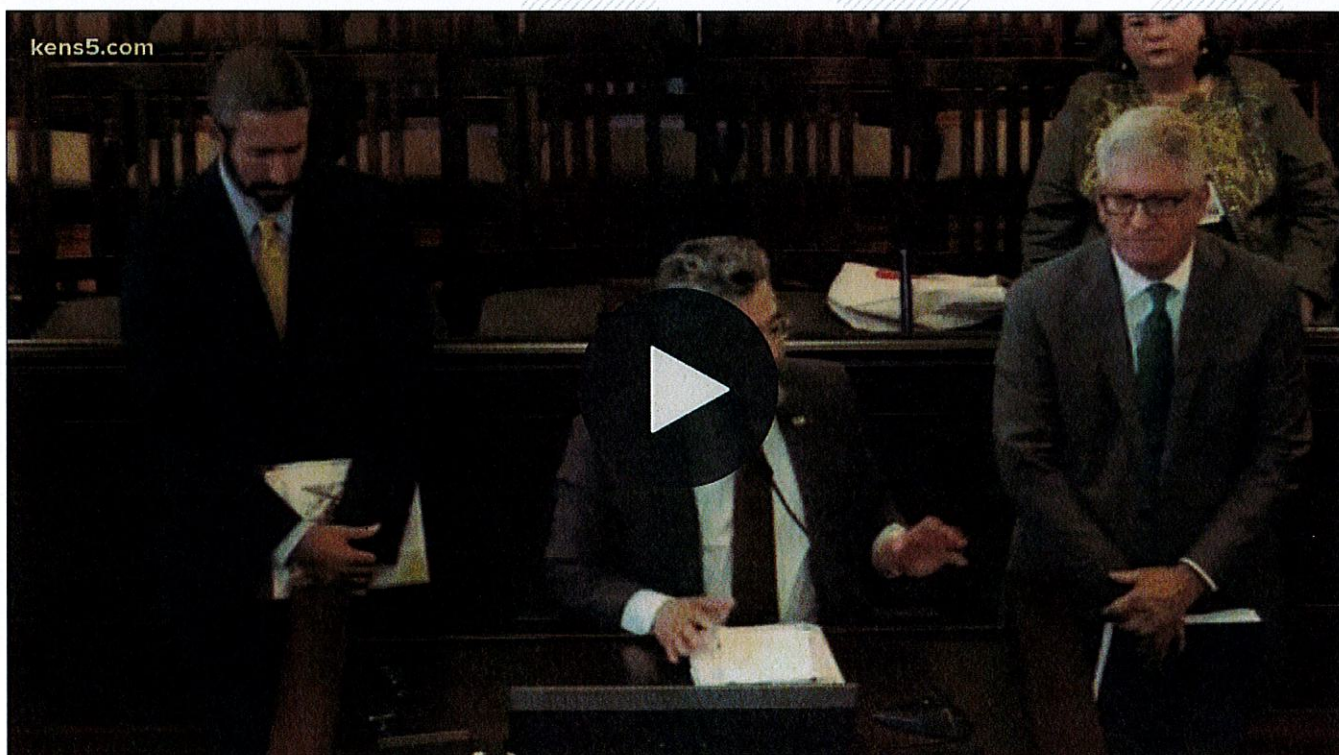
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Tags

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' Fearing violent retaliation' | Attorney leading Bexar County's opioid litigation is arrested

Martin Phipps, the founder of the Phipps Law Firm, was arrested on a misdemeanor charge of harassment.



Author: Mariah Medina (KENS5)

Published: 3:45 PM CST February 8, 2021

Updated: 10:20 PM CST February 8, 2021



SAN ANTONIO — The founder of the law firm leading Bexar County's effort to secure a potentially billion-dollar settlement with opioid manufacturers was arrested Monday afternoon, court records show.

Martin Phipps, 51, was arrested on a misdemeanor charge of telephone harassment, online records revealed. A warrant states Phipps, the day after Christmas 2020, confronted a woman with whom he was romantically involved "and put her in such fear for her life" she fled the country to Mexico, leaving her personal belongings behind.

The warrant states that while the victim was en route to the airport, Phipps called and texted her multiple times telling her to return to his home and she replied she was going to Mexico and wouldn't return because she was fearful. The warrant states Phipps texted the woman more than 40 times over two days "in a manner reasonably likely to demean, harass, alarm and torment the victim."

According to the arrest affidavit, the victim filed to annul their marriage to avoid all contact with him "fearing violent retaliation as well as the threat of civil litigation for leaving the defendant."

Phipps' arrest comes after Phipps' law partner, attorney TJ Mayes, abruptly announced his resignation from the firm calling Phipps a "serial abuser of women," writing in a Tweet shared last month he was convinced "without a shred of doubt Phipps is a crook."

I resigned from the Phipps firm on 1/11 after I became convinced without a shred of doubt that Martin Phipps is a crook and a serial abuser of women. I turned over appropriate documents to the relevant regulatory agencies.

— T.J. Mayes (@tj_mayes_) [January 27, 2021](#)

Phipps, who owns the Paramour bar, has donated to a number of political campaigns through the years.

A letter obtained by KENS 5 last month shows several members of the small law firm signed off on a letter calling into question working conditions, along with allegations of mismanagement and Phipps' behavior. Sources estimated more than 5 people had left the firm over the last few months.

The Phipps firm, through attorney Gabe Ortiz, addressed Mayes' allegations in a statement, writing:

"The firm denies the unsubstantiated allegations. In fact, a majority of employees refused to sign the letter in question and continue to work at the firm on a daily basis, not fearful for their safety or of the work environment.

For over two years, this firm has dedicated millions of dollars and thousands of hours to do what is right by the citizens of Bexar County and hold the multi billion dollar pharmaceutical companies accountable for the damage and destruction they have caused. That commitment will never waiver. The individuals who departed had no litigation or trial experience and were not part of the trial team that has been assembled.

Unfortunately, social media gives anyone the platform to spew unfounded libelous accusations. The people they truly hurt, however, are the citizens of Bexar County.

A spokesperson for Bexar County said Monday the County had no comment. Previously, in response to the letter authored by members of Phipps' staff and emails obtained by KENS 5, a spokesperson for Bexar County said, "Bexar County is not a party to this matter. We have no comment."

A request for confirmation sent to Ortiz of the Phipps Law Firm was not returned as of this publication.

During the daily COVID-19 briefing Monday night County Judge Nelson Wolff acknowledged Phipps' arrest, saying he sent a letter Jan. 13 giving Watts Guerra LLP, the Phipps firm's co-counsel on the opioid litigation, authority to act as he saw fit to protect the county's legal rights and comply with any court orders.

Wolff said the chief of the civil section of the Bexar County District Attorney's Office's, Larry Roberson, is monitoring the situation and is expected to send a report to Commissioner's Court and "will decide what should be done" as it relates to Phipps' remaining on the case.

Alleged Threats Against San Antonio Councilman Emerge From Lawyer Involved With Opioid Lawsuit

Texas Public Radio | By Paul Flahive

Published January 29, 2021 at 9:57 PM CST



More troubling accusations are being made about Martin Phipps, the San Antonio lawyer who runs one of the firms representing Bexar County and more than a dozen others in lawsuits against opioid manufacturers.

According to a text conversation between two of the former employees – including former Phipps Mayes partner TJ Mayes – Martin Phipps has regularly expressed his desire to kill San Antonio City Councilman Manny Pelaez.

On Thursday, TPR reported on a complaint about Phipps with the Equal Employment Opportunity Commission and a letter six of his staff gave to the lawyer concerning what they called a hostile and abusive workplace and his “persistent display of homicidal fantasy.”

In the text exchange clearly documented for posterity, Mayes asks another employee whether they would be willing to swear under oath that he “heard Martin Phipps state his desire to kill Manny Palaez.”

“You are correct,” the other former employee replies. TPR has confirmed the conversation independently, but held back the name at the employee's request.

“It's one thing for someone to joke about someone...we've all in frustration said ‘Man, I could kill that guy,’ said the former employee. “You say things in frustration but then at some point you realize, oh you're not joking. You realize this is real. This isn't a joke.”

The intensity and frequency of the statement alarmed him.

The news came as a surprise to the District 8 councilman. Pelaez said he didn't know if it was his policies or the fact that he had represented former Phipps employees in employment disputes.

“Whatever the reason is, threatening the life of a public official – last I heard – is still a crime. Threatening the life of anyone is alarming,” said Pelaez.

According to Mayes there is more than a little personal and professional animus between the two lawyers.

A member of the Phipps Mayes team responded that the message was untrue.

"We will attribute this to a former employee continuing to make unfounded libelous accusations," said Gabe Ortiz, another lawyer speaking for the firm.

"Although we do not know when this alleged conversation occurred, we hope that if these former employees were truly concerned about the safety of Councilman Pelaez, they took appropriate measures at the time to ensure his well-being."

The text conversation took place on Jan 16, 5 days after Mayes had resigned. It isn't clear when the threats began.

Pelaez said while surprised by the news he did receive an email on Jan. 14 from Mayes stating that Phipps "was mentally unstable and capable of homicidal violence."

"This is not a joke and not overly-dramatized," read the email that warned Pelaez that it was a "highly volatile situation" and not to take "any action that could trigger him into violent behavior."

Pelaez said he didn't realize it was a warning for himself.

"That message doesn't say 'Hey, Manny, he threatened to kill you. That message says, I've taken steps to protect my family, keep this confidential. I did share it with (SAPD Police Chief) McManus," said Pelaez.

He said he didn't know what else to do with it. Now he has shared the recent threat.

As TPR reported Thursday, the new details build on an EEOC complaint filed by Mayes that said "three law enforcement agencies are aware that there is a tense situation related to this letter."

Mayes also said via text message that he contacted police about Phipps twice the day he resigned.

According to a letter given to Martin Phipps and dated Jan. 8, "Many of us are concerned that you may be in an immediate danger to yourself or others."

The letter is signed by a half-dozen current and former employees.

It also states that the signatories intend to abide by the current confidentiality agreements in place.

“Confidentiality clauses should not cover violence against women, illegal conduct, unethical acts and abusive behavior,” said Mayes.

He confirmed he is currently being sued by his former firm in private arbitration.

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Paul Flahive

Paul Flahive can be reached at Paul@tpr.org

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EXHIBIT J



**Family
Violence
Prevention
Services, Inc.**

**The Battered Women
and Children's Shelter**

Marta Prada Peláez, MA

President/CEO

Mark A. Jimenez

Chair

Christy Prescott

Chair-Elect

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Debra J. Williams, MD

DATE: JUNE 6, 2024
TO: SAN ANTONIO ETHICS REVIEW BOARD
FROM: MARTA PRADA PELAEZ, CEO OF FAMILY VIOLENCE
PREVENTION SERVICES
RE: ETHICS COMPLAINT FILED BY M.J PHIPPS AGAINST
COUNCILMAN MARC WHYTE

I am the CEO of one of the largest full-service domestic violence agencies in the United States. I am also the immediately past chairwoman of the Texas Family Violence Council.

One of the biggest challenges that organizations like mine face is educating members of the public about their duty to report child abuse and neglect. Thankfully, the Texas legislature acknowledged this challenge when it codified the child abuse reporting obligation in the Texas Family Code. As you know, the law obligates all Texans to immediately report to law enforcement when they reasonably suspect that a child is being harmed. Today, people are obligated to say something when they see something.

However, despite this statutory obligation, too many incidents of child abuse go unreported and uninvestigated because good people are afraid to make a report when they believe that a child is in imminent danger. After tragedy strikes, family and friends of victims report that what they feared was retaliation at the hands of the perpetrator of abuse.

Fears of retaliation are backed up by concrete examples of abusers who have weaponized the legal and bureaucratic systems. For example, abusers will often call immigration agents with requests that they deport a victim's family member when that family member reports the abuse on the victims' behalf. Abusers will often times file meritless lawsuits as a form of retaliatory harassment. They frequently file complaints to licensing agencies as a way to punish the person who reported them to law enforcement or Child Protective Services. They also make threats of exposing the reporting party to media scrutiny and destruction of that person's public reputation.

The Phipps complaint has all the elements of a textbook example of retaliation. The Complaint and the related media campaign are clearly designed to punish the Councilman who lived up to his obligation to report reasonable suspicions that a child was in imminent danger of abuse.

The damage has been done. Even if the Ethics Review Board dismisses the complaint, the weaponization of the municipal ethics grievance process has already accomplished one thing: It has given the public one more example of a reporting party effectively subjected to retaliation and public bullying.

This retaliatory complaint, without yet having been adjudicated by the ERB, has done incalculable damage to all of our efforts to combat child abuse and get people to say something when they see something. However, there are insufficient words to describe how much more damaging it would be if the ERB were to give legitimacy to this retaliation by finding that Councilman Whyte should not have swiftly reported his reasonable suspicions directly to Sheriff Salazar or Chief McManus in the manner that he did.


Marta Prada Pelaez, M.A.
President/CEO

EXHIBIT K

Incident Detail Report

Data Source: **Data Warehouse**
 Incident Status: **Closed**
 Incident number: **SAPD-2024-0572351**
 Case Numbers: **SAPD24091686**
 Incident Date: **4/26/2024 20:20:44**
 Report Generated: **5/31/2024 16:53:09**

Incident Information

Incident Type:	Routine	Alarm Level:	
Priority:	02	Problem:	Assault In Progress ^
Determinant:		Agency:	SAPD
Base Response#:		Jurisdiction:	SAPD
Confirmation#:		Division:	CENTRAL
Taken By:	MOSELEY, CANDRICE	Battalion:	CENTRAL
Response Area:	2110	Response Plan:	2110 Routine
Disposition:	C01-CLR AFR RPT-INFORMATION	Command Ch:	
Cancel Reason:		Primary TAC:	
Incident Status:	Closed	Secondary TAC:	
Certification:		Delay Reason (if any):	
Longitude:	98492696	Latitude:	29415096

Incident Location

Location Name:	
Address:	303 King William
Apartment:	
Building:	
City, State, Zip:	SAN ANTONIO TX 78204
County:	BEXAR
Location Type:	
Cross Street:	BEAUREGARD/E SHERIDAN
Map Reference:	616E6

Supplemental Information - Person

PERSON 1
 Name: **PHIIPS MARTIN**
 DOB: [REDACTED] OLS: TX

Call Receipt

Caller Name:	JOINER, JESSICA
Method Received:	Non Emergency
Caller Type:	Yes
Caller Address:	
Caller Building:	
Caller City, State, Zip:	
Call Back Phone:	[REDACTED]
Caller Location:	
Caller Location Phone:	
Caller Apartment:	
Caller County:	

Time Stamps

Description	Date	Time	User	Elapsed Times Description	Time
Phone Pickup	4/26/2024	20:19:14			
1st Key Stroke	4/26/2024	20:19:15			
In Waiting Queue	4/26/2024	20:20:52		Received to In Queue	00:00:08
Call Taking Complete	4/26/2024	20:29:44	MOSELEY, CANDRICE	Call Taking	00:09:00
				In Queue to 1st Assign	00:01:34
1st Unit Assigned	4/26/2024	20:22:26		Call Received to 1st Assign	00:03:12
1st Unit Enroute	4/26/2024	20:22:29		Assigned to 1st Enroute	00:00:03.8
1st Unit Arrived	4/26/2024	20:27:18		Enroute to 1st Arrived	00:04:48.3
Closed	4/26/2024	21:46:43	Mobile1	Incident Duration	01:27:29

Resources Assigned

Unit	Flag	Assigned	Disposition	Enroute	Staged	Arrived	At Patient	Delay Avail	Complete	Odm. Enroute	Odm. Arrived	Cancel Reason
2121T	Y	20:22:26	C01-CLR AFR RPT-INFORMATION	20:22:29		20:29:18			21:46:43			
2116B	N	20:24:12		20:27:02		20:27:18			21:30:35			

Personnel Assigned

Unit	Name	ID
2121T	ROMO, JONATHAN D	(1840) [REDACTED]
2116B	VEGA, DANIEL	(2515) [REDACTED] TERRELL, LUKE A (1862) [REDACTED]

Caution Notes

No Caution Notes found

Pre-Scheduled Information

No Pre-Scheduled Information

Transports
No Transports Information

Transport Legs
No Transports Information

Comments

Date	Time	User	Type	Conf.	Comments
4/26/2024	20:20:52	[REDACTED]	Response		DAUGHTER [REDACTED] TEXT C THAT FATHER IS SCREAMING / HURTING HER ... SQUEEZING HER ARMS ... DAUGHTER SAYS IT IS NOT SAFE THEY ARE IN THE CARRIAGE HOUSE IN BACK ... C IS NOT ON LOC [REDACTED] EX MARTIN PHIPPS [REDACTED] T/L NOW DAUGHTER JUST TEXT I'M SCARED C REQ OFFICERS SPEAK WITH DAUGHTER SEPARATELY C IS OUT OF TOWN IN HOUSTON...FATHER TOOK DAUGHTER PHONE AWAY UNK WPNS...MALE DOES OWN A GUN WALL AROUND THE PROPERTY WITH AUTOMATIC GATE MALE PN [REDACTED] SP WEARING GREEN TSHIRT ... DAUGHTER CANNOT OPEN GATE SCARED TO GO UP THERE C SAID MALE WILL KEEP DAUGHTER AWAY FROM OFFICERS DAUGHTER [REDACTED] DAUGHTER IS TEXTING ON HER LAPTOP C REQ CB FROM OFFICERS attempted to call back c.. no answer C CALLING BACK ADVISED SHE WAS DISCONNECTED PLEASE CALL BACK... LINE OPEN WAITING FOR CALL Requested Case Number(s) issued for Incident #[SAPD-2024-0572351], Jurisdiction: SAPD. Case Number(s): SAPD24091686. requested by 2121T. sb-1 Name: PHIPPS, MARTIN JOHN SID: 1144466
4/26/2024	21:20:22	TERRELL, LUKE A (1862)	Response	Y	[REDACTED]
4/26/2024	21:21:01	TERRELL, LUKE A (1862)	Response	Y	[REDACTED]
4/26/2024	21:21:53	TERRELL, LUKE A (1862)	Response	Y	R-1 (EX SIGNIFICANT) JESSICA JOINER [REDACTED] info to be written
4/26/2024	21:46:41	TERRELL, LUKE A (1862)	Response		
4/26/2024	21:46:43	TERRELL, LUKE A (1862)	Response		dmea ** THIS CALL HAS BEEN GIVEN A DISPOSITION BY THE HANDLING OFFICER **

Address Changes
No Address Changes

Priority Changes

Date	Time	Changed from Priority	Reason	User
4/26/2024	20:20:49	05	Additional Info	CM

Alarm Level Changes
No Alarm Level Changes

Activity Log

Date	Time	Radio	Activity	Location	Log Entry	User
4/26/2024	20:20:45		Problem Nature		Incident problem nature changed from <Blank> to 911 Hang Up ^	[REDACTED]
4/26/2024	20:20:49		Incident Priority Change		Incident priority changed from 05 to 02 due to Additional Info	[REDACTED]
4/26/2024	20:20:49		Problem Nature		Incident problem nature changed from 911 Hang Up ^ to Assault In Progress ^	[REDACTED]
4/26/2024	20:20:52		Read Comment	303 King William	Comment for Incident 558 was marked as read.	[REDACTED]

4/26/2024	20:22:22		Read Incident		Incident 558 was Marked as Read.
4/26/2024	20:22:22		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	20:22:26	2121T	DISP	303 King William	
4/26/2024	20:22:26		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	20:22:29	2121T	RESP	303 King William	Responding From = N FRIO ST\W SALINAS.
4/26/2024	20:22:47	2121T	Record Check: Person Check	W TRAVIS ST\N FRIO ST	2121T IncidentId: 58099558 BasicQuery=true lastname-PHIIPS firstname-MARTIN dob- State-TX lastnameB-PHIIPS firstnameB-MARTIN DOBB- StateB-TX
4/26/2024	20:22:47	2121T	Person Check	W TRAVIS ST\N FRIO ST	Added Person Check supplemental information
4/26/2024	20:22:47		Supplemental info		
4/26/2024	20:22:47		Supplemental Information	303 King William	Supplemental Person record 10298332 - was added for MARTIN PHIIPS
4/26/2024	20:22:52	2121T	Route Deviation	N FRIO ST\W HOUSTON ST	Unit 2121T deviated from original driving directions route
4/26/2024	20:23:33		UserAction		User clicked Exit/Save
4/26/2024	20:24:05		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	20:24:12	2116B	DISP	S ALAMO ST\S PRESA ST	
4/26/2024	20:25:07		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	20:25:26		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	20:26:22		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	20:27:02	2116B	RESP	303 King William	Responding From = S ALAMO ST\BEAUREGARD.
4/26/2024	20:27:18	2116B	ONSCENE	303 King William	
4/26/2024	20:27:32		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	20:27:58		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	20:28:48		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	20:29:04		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	20:29:17		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	20:29:18	2121T	ONSCENE	303 King William	
4/26/2024	20:29:43		UserAction		User clicked Exit/Save
4/26/2024	20:32:27		UserAction		User clicked Exit/Save
4/26/2024	20:35:08		UserAction		User clicked Exit/Save
4/26/2024	20:37:09		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	20:40:24		UserAction		User clicked Exit/Save
4/26/2024	20:40:41		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	20:40:44		UserAction		User clicked Exit/Save
4/26/2024	20:46:25		UserAction		User clicked Exit/Save
4/26/2024	20:58:22		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	20:58:48		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	20:59:12		UserAction		User clicked Exit/Save
4/26/2024	20:59:16		UserAction		User clicked Exit/Save
4/26/2024	21:11:46		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	21:11:46	2121T	Requested Case Number	BEAUREGARD\KING WILLIAM	Requested Case Number(s) issued for Incident #[SAPD-2024-0572351], Jurisdiction: SAPD. Case Number(s): SAPD24091686.
4/26/2024	21:21:51		Read Comment		Comment for Incident 558 was Marked as Read.
4/26/2024	21:21:55		Read Comment	303 King William	Comment for Incident 558 was marked as read.
4/26/2024	21:22:28		UserAction		User clicked Exit/Save
4/26/2024	21:27:18		Incident Late		Active incident marked as late

4/26/2024	21:27:35	2116B	Reset System Timer	PVT ST AT 401 S FRIO ST	[Timer] Reset System Timer [Reset Reason] RESET [Next Late Check Time] 4/26/2024 22:01:07
4/26/2024	21:29:18		Incident Late		Active incident marked as late
4/26/2024	21:30:35	2116B	AVAIL	303 King William	Unit Cleared From Incident SAPD-2024-0572351
4/26/2024	21:31:58	2121T	Reset System Timer	MISSION ST\FORCKE	[Timer] Reset System Timer [Reset Reason] RESET [Next Late Check Time] 4/27/2024 01:05:31
4/26/2024	21:38:54		UserAction		User clicked Exit/Save
4/26/2024	21:46:43	2121T	Disposition	303 King William	C01-CLR AFR RPT-INFORMATION
4/26/2024	21:46:43	2121T	AVAIL	303 King William	Unit Cleared From Incident SAPD-2024-0572351
4/26/2024	21:46:43	2121T	Response Closed	303 King William	Response Disposition: C01-CLR AFR RPT-INFORMATION
4/26/2024	22:06:57		UserAction		User clicked Exit/Save
4/26/2024	23:22:00		UserAction		User clicked Exit/Save

Edit Log

Date	Time	Field	Changed From	Changed To	Reason	Table	Workstation	User
4/26/2024	20:19:14	Agency Name		SAPD	(Response Viewer)	Incident		
4/26/2024	20:19:17	Address	(Blank)	303 KING	New Entry	Response_Master_Incident		
4/26/2024	20:19:28	Longitude	0	98492696	Entry Selected/Returned from GeoLocator	Response_Master_Incident		
4/26/2024	20:19:28	Latitude	0	29415096	Entry Selected/Returned from GeoLocator	Response_Master_Incident		
4/26/2024	20:19:28	City		SAN ANTONIO	Updated City	Response_Master_Incident		
4/26/2024	20:19:28	Address	303 KING	303 KING WILLIAM	Entry Selected/Returned from GeoLocator	Response_Master_Incident		
4/26/2024	20:19:28	ResponsePlanType0		0	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:19:28	Response_Area		2110	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:19:28	Battalion		CENTRAL	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:19:28	Division		CENTRAL	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:19:28	Jurisdiction		SAPD	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:19:28	PSAP		SAN ANTONIO: 210-207-7273	(Response Viewer)	Incident		
4/26/2024	20:19:28	COUNCIL DISTRICT		1	(Response Viewer)	Incident		
4/26/2024	20:20:45	Incident_Type		Routine	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:20:45	Priority_Number	0	5		Response_Master_Incident		
4/26/2024	20:20:45	Priority_Description		05		Response_Master_Incident		
4/26/2024	20:20:45	ResponsePlanType0		1	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:20:45	DispatchLevel		Default Police	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:20:45	Response_Plan		2110 Routine	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:20:45	Problem		911 Hang Up ^	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:20:49	Incident_Type		Routine	(Response Viewer)	Response_Master_Incident		
4/26/2024	20:20:49	Priority_Number	5	2	Additional Info	Response_Master_Incident		
4/26/2024	20:20:49	Priority_Description05		02	Additional Info	Response_Master_Incident		
4/26/2024	20:20:49	ResponsePlanType0		1	(Response Viewer)	Response_Master_Incident		

4/26/2024	20:20:49	Response_Plan		2110 Routine	(Response Viewer)	Response_Master_Incident
4/26/2024	20:20:49	Problem	911 Hang Up ^	Assault In Progress ^	(Response Viewer)	Response_Master_Incident
4/26/2024	20:20:52	COUNCIL DISTRICT		1	(Response Viewer)	Incident
4/26/2024	20:20:52	PSAP		SAN ANTONIO: 210-207-7273	(Response Viewer)	Incident
4/26/2024	20:20:52	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	20:20:54	Pickup_Map_Info		616E6		Response_Transports
4/26/2024	20:20:54	Map_Info		616E6		Response_Master_Incident
4/26/2024	20:20:54	ACCESS CODE		NA	Polygon Lookup	Response_User_Data_Field
4/26/2024	20:21:54	Caller_Name		JOINER, JESSICA	(Response Viewer)	Response_Master_Incident
4/26/2024	20:21:59	Call Back Phone		[REDACTED]	(Response Viewer)	Incident
4/26/2024	20:22:00	Call_Back_Phone		[REDACTED]	(Response Viewer)	Response_Master_Incident
4/26/2024	20:22:22	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	20:22:22	Read Call	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	20:22:26	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	20:24:05	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	20:25:07	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	20:25:26	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	20:26:22	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	20:27:24	Caller_Type		Yes	(Response Viewer)	Response_Master_Incident
4/26/2024	20:27:26	MethodOfCallRcvd		E911	(Response Viewer)	Response_Master_Incident
4/26/2024	20:27:27	Caller_Type	Yes	No	(Response Viewer)	Response_Master_Incident
4/26/2024	20:27:28	Caller_Type	No	Yes	(Response Viewer)	Response_Master_Incident
4/26/2024	20:27:29	MethodOfCallRcvd	E911	Non Emergency	(Response Viewer)	Response_Master_Incident
4/26/2024	20:27:32	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	20:27:58	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	20:28:48	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	20:29:04	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	20:29:17	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	20:37:09	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	20:40:41	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	20:58:22	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	20:58:48	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	21:11:46	Unread Comment	False	True	(Response Viewer)	Incident
4/26/2024	21:21:51	Read Comment	False	True	(Response Viewer)	Response_Master_Incident
4/26/2024	21:21:55	Unread Comment	False	True	(Response Viewer)	Incident

Custom Time Stamps
No Custom Time Stamps

Custom Data Fields

Description

PSAP

COUNCIL DISTRICT
PSAP

COUNCIL DISTRICT
ACCESS CODE

Attachments

No Attachment

Data

SAN ANTONIO:
210-207-7273
1
SAN ANTONIO:
210-207-7273
1
NA

User

