

# Brazil & Dunn

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October 17, 2008

The Honorable Hope Andrade  
Texas Secretary of State  
p. o. Box 12060  
Austin, Texas 78711-2060

**BY FAX ONLY: 512-475-2811**

Re: 2008 General Election for State Board of Education, District 7

Dear Secretary Andrade:

Be advised the undersigned represents Laura Ewing, the Democratic nominee for the 2008 General Election for State Board of Education, District 7. As you know, District 7 includes Jefferson, Chambers, and Galveston Counties as well as parts of Brazoria and Harris Counties. My client's opponent is the Republican nominee, David Bradley. Mr. Bradley is presently the incumbent in that office.

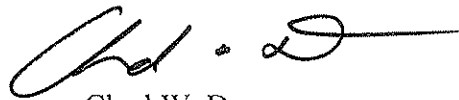
Recently, conclusive evidence has been discovered that Mr. Bradley does not live within a county in his district. Instead, Mr. Bradley lives with his wife in a home in Jasper County, Texas. After Mr. Bradley's election to the State Board of Education, he and his wife purchased a residence in Jasper County, Texas. Mr. and Mrs. Bradley have been taking a homestead exemption on their home in Jasper County, and Mr. Bradley has sworn that this residence was his principal residence. Such a declaration, if proven to be false, is a state felony under Texas Penal Code § 37.10. Documents supporting the foregoing claims are attached hereto. You can confirm the continued existence of the homestead exemption at [www.jcad.org](http://www.jcad.org), which records are incorporated herein by reference.

As a result of the foregoing, Ms. Ewing has directed me to request from you an administrative declaration of ineligibility for David Bradley. *See* Tex. Elec. Code § 145.003. As the presiding officer of the final canvassing authority for this office, the law permits you to declare a candidate ineligible after the polls close on Election Day. *See id.* at paragraph (d). Texas Election Code § 67.101(b) designates you as the presiding officer of the final canvassing authority for this race. Therefore, it is requested that you issue an administrative declaration of ineligibility at the appropriate time.

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We are available to offer additional information if you require, and appreciate your attention to this important matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chad W. Dunn", with a long horizontal flourish extending to the right.

Chad W. Dunn

CWD:crw  
Attachments

**APPLICATION FOR RESIDENTIAL HOMESTEAD EXEMPTION**  
 To complete this form, see the instructions on back of this form.

Year 2001

Appraisal district name <b>JASPER COUNTY APPRAISAL DISTRICT</b>	Phone (Area code and number) <b>(409) 384-2544</b>
Address <b>P. O. Box 1300, Jasper, Texas 75951</b>	
For appraisal district office use only Legal description:	Parcel number <b>000410-000200</b>
Step 1: Owner's name and address (attach sheets if needed)	Owner's Name (person completing application): <u>John David Bradley</u> Current Mailing Address (number and street): <u>2165 NORTH</u> City, State, ZIP Code: <u>Beaumont, Tx 77701</u> Driver's License, Personal ID Certificate, or Social Security Number: <u>08429194</u> Percent Ownership in Property: <u>100%</u> Other Owner's Name(s) (if any):  Other Owner's Percent Ownership:  Phone (area code and number): <u>409-835-3808</u> Birth Date: <u>5-14-58</u>
Step 2: Describe your property	Street address if different from above, or legal description if no street address; include property account number, if available (optional):  MOBILE HOMES - Give make, model, and identification number: Attach a copy of document of title from the Texas Department of Housing and Community Affairs if home is 8' x 40' or larger and document has not been cancelled, or attach a verified copy of the purchase contract that shows you are the owner of the mobile home.  OPTIONAL - Number of acres used for residential purposes (yard, garden, garage, etc.): _____ acres
Step 3: Check exemptions that apply to you	<input checked="" type="checkbox"/> <b>GENERAL RESIDENTIAL EXEMPTION:</b> You qualify for this exemption if (1) you owned this property on January 1; (2) you occupied it as your principal residence on January 1; and (3) you or your spouse have not claimed a residence homestead exemption on any other property. <input type="checkbox"/> <b>OVER-65 EXEMPTION:</b> You qualify for this exemption if you are 65 years of age or older. This exemption also includes a school tax limitation, or ceiling. You can't claim a disability exemption if you claim this exemption. You must apply within one year of the date you acquired the home, if you were 65 or older when you acquired and occupied the home as your principal residence, or within one year of the date of your 65th birthday, if you already owned the home and turned 65 after January 1. Please check if you will transfer a tax ceiling from your last home. .... Yes <input type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/> <b>DISABILITY EXEMPTION:</b> You qualify for this exemption if you qualify for the general homestead exemption and on January 1 you were under a disability for the purposes of payment of disability benefits under the federal Old Age, Survivor's and Disability Insurance Act OR you met the definition of disabled in that Act. You can't claim an over-65 exemption if you claim this exemption. This exemption does NOT include a school tax limitation. <input type="checkbox"/> <b>OVER-55 SURVIVING SPOUSE OF A PERSON WHO RECEIVED THE OVER-65 EXEMPTION:</b> You qualify for an extension of the over-65 exemptions and the school tax limitation if (1) you were 55 years of age or older on the date your spouse died and (2) your deceased spouse was receiving the over-65 exemptions on this residence homestead or would have applied and qualified for the exemptions in the year of the spouse's death. Note: You will not receive the school tax limitation unless your spouse died on or after December 1, 1987. Deceased Spouse's Name _____ Date of Death _____
Step 4: Answer if applies	<b>COOPERATIVE HOUSING RESIDENTS:</b> Do you have an exclusive right to occupy this unit because you own stock in a cooperative housing corporation? ..... Yes <input type="checkbox"/> No <input type="checkbox"/>
Step 5: Check if late	<input type="checkbox"/> Application for homestead exemption for prior tax year, _____. Note: You must have met all of the qualifications checked above to receive the prior year tax exemption.
Step 6: Sign and date the application	By signing this application, you state that you are qualified for the exemptions checked above. You state that the facts in this application are true and correct. You also state that you do not claim an exemption on another residence homestead. You must notify the chief appraiser if and when your right to the exemptions end. You swear or affirm that you have read and understand the penalty for filing a false statement. sign here: <u>[Signature]</u> Date: <u>6/3/01</u>
If you make a false statement on this application, you could be found guilty of a Class A misdemeanor or a state jail felony under Texas Penal Code Section 37.10.	

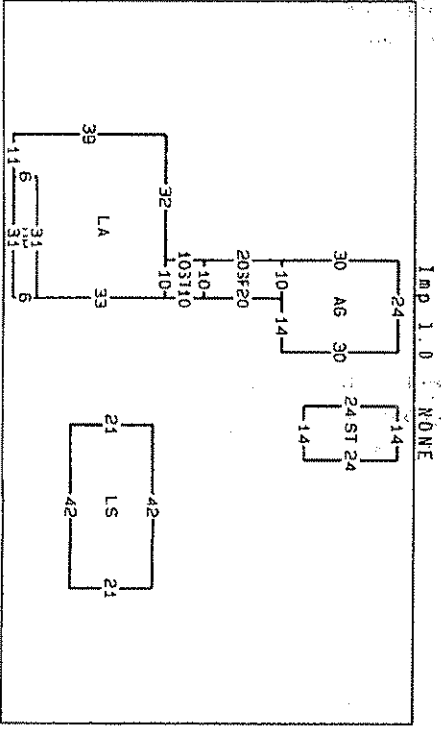
Owner ( 22986 ) AB 410 L T PRATT TR 1 Legal Description  
 BRADLEY JOHN D & BARBARA 0960-0010  
 2165 NORTH  
 BEAUMONT TX 777010000 1 ACRES  
 Situs Address Date of Last Appraisal: 2007/10/02  
 CO RD 827 051602  
 BUNA 2007 PROTEST SETTLED AD  
 State Exemptions XGHS  
 Miscellaneous AD  
 Use Code: EI Appraiser ID: AD  
 TAP Acres: 1  
 User Code 1: 7

JASPER CO APPRAISAL, JASPER COUNTY, BUNA ISD, BUNA ESD #1, SOUTHEAST TEXAS GWD, JASPER CO LATRD

Improvements	Class	UCI	HS	Year	HS	Size	Age	Cond	Comp	Meth	Rate	Market	OT	Value	Extras	Additives	Market
1.0	NONE	SF05FB	EI	VI973	2.334	77.222	1.750					78.972		0			0

Seg	Class	Str	Description	Year	HS	Size	Age	Cond	Comp	Meth	Rate	Market	OT	Value	Extras	Additives	Market
1.1	LA	LA	LIVING AREA			1.452			100	MAIN	37.00	50		53.724			37.607
1.2	SP	SP	SCREEN PORCH			100			100	PCNT	17.50	30		1.750			1.225
1.3	AG	AG	ATTACHED GARAG			200			100	PCNT	10.50	50		2.100			1.470
1.4	ST	ST	STORAGE			720			100	PCNT	17.50	50		12.600			8.820
1.5	OP	OP	OPEN PORCH			336			100	PCNT	17.50	50		5.880			4.116
1.6	LS	LS	LIVING 2ND FLR			186			100	PCNT	8.75	25		1.628			1.140
1.7	LS	LS	LIVING 2ND FLR			882			100	MAIN	37.00	25		32.634			22.844

LAND UTIL(STD RURAL) Imp 1.0 NONE  
 1.0 STD RURAL(1) 1.0 STD RURAL(1)  
 1.0 STD RURAL(1) FRAME(1) SLAB(1) MASONRY FP(1) V+1750): CENT AIR/HEAT(1) R+2) TIN(1) GABLE(1) 1 1/2 STORY(11).





### WARRANTY DEED WITH VENDOR'S LIEN

Date: October 30, 2000

Grantor: Charles Adkins and Renee Adkins

P.O. Box 2134 Village Mills, Hardin County, Texas 77663

Grantee: JOHN DAVID BRADLEY AND WIFE, BARBARA THEONE BRADLEY

Grantee's Mailing Address (including county):

ROUTE 2 BOX 381  
BUNA, TEXAS 77612  
Jasper County

Consideration:

TEN AND NO/100 DOLLARS (\$10.00) and other valuable consideration and note(s) of even date executed by Grantee payable to the order of

HIBERNIA NATIONAL BANK

("Lender"),

in the amount(s) of \$ 100,000.00

the note(s) being secured in whole or in part by vendor's lien retained in favor of Lender in this deed and also secured by a deed of trust of even date from Grantee to

MICHAEL L. RIDDLE,

Trustee.

Property (including any improvements):

SEE LEGAL DESCRIPTION ATTACHED HERETO AND MADE A PART HEREOF

Reservations from and Exceptions to Conveyance and Warranty:

Any and all restrictions and easements of record.

For Grantor and Grantor's successors, a reservation of any and all interest in any oil, gas, and other minerals owned by Grantor that are in and under the property and that may be produced from it and a reservation of the right of ingress and egress at all times for mining, drilling, exploring, operating, and developing the property for oil, gas, and other minerals and for removing them from the property. If this interest is subject to an existing lease for oil and gas or oil, gas, and other minerals, Grantor is entitled to receive the royalties and other benefits that are associated with the interest and payable under the lease.

Grantor, for the consideration and subject to the reservations from and exceptions to conveyance and warranty, grants, sells, and conveys to Grantee the property, together with all and singular the rights and appurtenances thereto in any wise belonging, to have and hold it to Grantee, Grantee's heirs, executors, administrators, successors, or assigns, as the case may be, forever. Grantor binds Grantor and Grantor's heirs, executors, administrators, successors and assigns, as the case may be, to warrant and forever defend all and singular the property to Grantee and Grantee's heirs, executors, administrators, successors, and assigns against every person whatsoever lawfully claiming or to claim the same or any part thereof, except as to the reservations from and exceptions to conveyance and warranty.

**2006 Certified Values**

**Account Number: 043000-000-017050-00000-5**

**Owner Name:** BRADLEY DAVID  
**Property Address:** 2165 NORTH ST  
**Owner Address:** 2165 NORTH ST  
 BEAUMONT TX 777011550  
**Legal Description:** MC FADDIN 2 ALL L9 &  
 ADJ W12' L10 B 25  
**Deed Index:** 02001043759  
**Property Use Code:** F1

**Taxing Entities:** BEAUMONT ISD  
 BEAUMONT PORT  
 DRAIN DIST #6  
 JEFF CO WAT/NAV  
 JEFFERSON COUNTY  
 CITY OF BEAUMONT  
 FARM AND LATL RD

**Homestead:**  
**Over 65:**  
**Disabled Vet:**  
**Disabled:**

**Value Information**

**Total Improvement Value:** \$50,640.00  
**Total Land Value:** \$6,200.00  
**Productivity Value:** \$0.00  
**Total Value:** \$56,840.00  
**Average Depth:** 150.00  
**Frontage:** 62.00  
**Acreage:**  
**Square Footage:**

<b>Structure A</b>	<b>Class</b>	<b>Siding</b>	<b>Stories</b>	<b>Condition</b>	<b>Age</b>	<b>Area</b>	<b>Net Value</b>
Main Building	SA1		02 *	FAIR	65	3,266.00	\$46,034.00
Garage 1							\$0.00
Garage 2							\$0.00
ASPHALT PARKING						4,020.00	\$4,020.00
CARPORT/CANOPIES						196.00	\$588.00
<b>Foundation Adjustment:</b>							\$0.00
<b>Market Modifier :</b>							0.00 % \$0.00
<b>Additional Depreciation:</b>							0.00 % \$0.00
<b>Percent Complete:</b>							100.00 %

Market Modifiers are methods of adjusting value (positive or negative) based on comparable sales to accurately reflect current market value as of January 1 of each year.