



## **Filing Receipt**

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# George J. Wakileh

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Grand Lakes Municipal Utility District No. 2

## Board of Directors

- Michael Christopher McClusky, President | - J. Scot Vann, Vice President | - Greg Henry, Secretary  
- Brad Baker, Assistant Secretary | - William Don Butler, Director

March 31, 2024

~ by email only ~

Municipal District Services

406 W. Grand Pkwy S, Ste 260

Katy, Texas 77494

Att: Bryan K. Chapline, Founder and President <[BChapline@mdswater.com](mailto:BChapline@mdswater.com)>

Toni Hardeman, Customer Service <[THardeman@mdswater.com](mailto:THardeman@mdswater.com)>

Schwartz, Page & Harding, LLP

1300 Post Oak Blvd, Suite 2400

Houston, TX 77056-3012

Att: Chris Skinner <[cskinner@sphllp.com](mailto:cskinner@sphllp.com)> | Gordon Cranner <[gcranner@sphllp.com](mailto:gcranner@sphllp.com)> | Melia Berry <[mberry@sphllp.com](mailto:mberry@sphllp.com)>

## **The law firm Schwartz, Page & Harding LLP tampered with an official government document**

This is in further to previous correspondence regarding the Rate Order proposed by the law firm Schwartz, Page & Harding LLP for Grand Lakes MUD No. 2 and blindly approved by the Board of Directors. The said Rate Order is unlawful, illegal and must be nullified.

(a) The Rate Order was signed on January 29, 2024 (see the screenshot below) by Greg Henry, Secretary of the Board of the Grand Lakes MUD No. 2. The said officer is disqualified and must have been removed from the Board several months ago. Greg Henry – owner of KPM Management and Secretary of the Board of Directors of the Grand Lakes Municipal Utility District No. 2 – was, in 2023, awarded, by the Grand Lakes Community Association (which upkeeps all property under the jurisdiction of Grand Lakes Municipal Utility District No. 4, No. 1, and No. 2), contract in connection with property located in the district and neighboring districts, as Managing Agent of the whole Grand Lakes Community.

The contract could be based on a (business) relationship between Greg Henry and Richard Powell [President of the Grand Lakes Community Association]. The residents demanded that the Community (Homeowner) Association present a contractor qualification matrix that shows who the bidders were and how KPM Management was selected as the winning bidder. This is the norm in Procurement and Supply Chain. The Community (Homeowner) Association never honored the request, making it clear that something irregular was done. KPM Management's contract was terminated as of January 31, 2024, likely based on this incident. Montage Community Services was awarded the contract from February 1, 2024.

SIGNED AND SEALED this 29<sup>th</sup> day of January, 2024.

  
\_\_\_\_\_, Board of Directors



(b) While the Grand Lakes MUD No. 2 has zero debt outstanding, the said Rate Order increases residents' water bills by 2.0 to 3.7 times. This *huge* increase in the water bill is absolutely unjustified.

(c) While the Rate Order is meant to be effective from February 1, 2024, it was announced on the MUD's website on February 19, 2024 (see the Notice at <https://www.grandlakesmud2.com/posts/2024-02-19/rate-order-change-notice>).

(d) In February 2024, Municipal District Services (MDS Water) issued to all residents seated within the district water bills based on the new Rate Order, even though (i) the said Order is invalid; and (ii) residents' water bills run from some day in January 2024 to 30 days later in February 2024. That is, **no** prorating was done whatsoever. All water bills were issued as if the invalid Rate Order became effective from January 2024.

(e) While the Effective Date of the new Rate Order is meant to be February 1, 2024, the first page of the Order lists that date as February 1, 2023 (see the screenshot below).

BE IT ORDERED BY THE BOARD OF DIRECTORS OF GRAND LAKES MUNICIPAL UTILITY DISTRICT NO. 2, THAT THE FOLLOWING RATE ORDER IS HEREBY ADOPTED. Any Rate Order, and amendments thereto, heretofore adopted by the Board of Directors establishing rates for water and sewer service and pertaining to related matters shall be revoked on February 1, 2023, the effective date of this Rate Order (hereafter referred to as "Order"). Date must be February 1, 2024 for this Rate Order to be lawful and valid

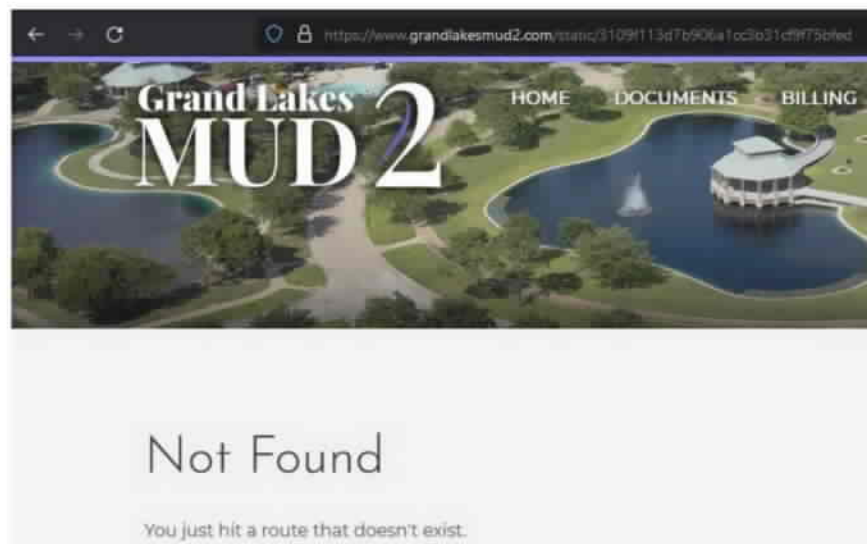
(f) The law firm Schwartz, Page & Harding LLP has over the past few days fixed the error online, but **without** changing the signature page (signed on January 29, 2024 by Greg Henry, Secretary of the Grand Lakes MUD No. 2 Board), **without** any notice of the revision, and **without** any notice to the residents. This is considered malicious, deceptive, and unlawful **tampering with official government documents** because quality and revision control procedures are not followed and because no document can ever be revised in March 2024, changing the Effective Date from February 1, 2023 to February 1, 2024, keeping a signature page with the date January 29, 2024, and without ever documenting or publicizing the revision.

**Both Rate Orders, the original and revised, are unlawful and invalid; they must be nullified.** The Rate Order with the erroneous Effective Date of February 1, 2023 was at the following link, but has been removed without any notice.

[https://www.grandlakesmud2.com/static/3109f113d7b906a1cc3b31cf9f75bfed/Rate\\_Order\\_12\\_18\\_24\\_bfa1a3dfdf.pdf](https://www.grandlakesmud2.com/static/3109f113d7b906a1cc3b31cf9f75bfed/Rate_Order_12_18_24_bfa1a3dfdf.pdf)

The revised Rate Order with the Effective Date changed to February 1, 2024 is put at a new link:

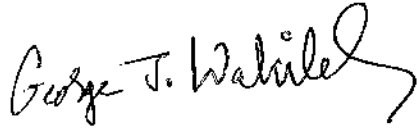
[https://www.grandlakesmud2.com/static/244a14cd8cb9786eb684b2fd146f9508/Rate\\_Order\\_12\\_18\\_2023\\_revised\\_a835042e10.PDF](https://www.grandlakesmud2.com/static/244a14cd8cb9786eb684b2fd146f9508/Rate_Order_12_18_2023_revised_a835042e10.PDF).



I have brought this matter to the Public Utilities Commission of Texas (PUCT). This letter is such that the Board of Directors of the Grand Lakes MUD No. 2 and the operator Municipal District Services (MDS Water) do **not** claim ignorance about the Rate Order dated 12/18/2023 and signed on 1/29/2024 by the Secretary of the Board. The said Order is an unlawful and invalid document. It is null and void.

Sincerely,

George J. Wakileh, Ph.D.

A handwritten signature in black ink that reads "George J. Wakileh". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

George Wakileh

2024.03.31 23:16:44 -05'00'