



November 26, 2025

THE HON. VINCENT J. VENEGONI, JR., JUSTICE OF THE PEACE, PRECINCT 4, IN HIS OFFICIAL CAPACITY, PLAINTIFF, V. CHRIS HILL, COUNTY JUDGE, SUSAN FLETCHER, COMMISSIONER PCT. 1, CHERYL WILLIAMS, COMMISSIONER PCT. 2; DARRELL HALE, COMMISSIONER PCT. 3, & DUNCAN WEBB, COMMISSIONER PCT. 4,

Via eService: chill@co.collin.tx.us; sfletcher@co.collin.tx.us; cdwilliams@co.collin.tx.us; dhale@co.collin.tx.us; jdwebb@co.collin.tx.us;

RE: Demand is made for the reinstatement of all prior staff members and delivery of back pay and current pay to the staff of the Honorable Vincent J. Venegoni Jr. in his capacity as Justice of the Peace for Precinct 4.

Dear Ladies and Gentlemen:

This office represents THE HON. VINCENT J. VENEGONI, JR., JUSTICE OF THE PEACE, PRECINCT 4, IN HIS OFFICIAL CAPACITY.

The Honorable **Vincent J. Venegoni Jr.** in his capacity as Justice of the Peace for Precinct 4, seeks resolution with Defendants, the Collin County Commissioners Court, Chris Hill in his capacity as County Judge, Susan Fletcher in her official capacity as county commissioner for Precinct 1, Cheryl Williams in her official capacity as county commissioner for Precinct 2, Darrell Hale in his official capacity as county commissioner for precinct 3, and Duncan Webb in his official capacity as county commissioner for precinct 4, and requests communications and information as follows:

1. On November 18, the Collin County Commissioners Court published the adopted FY 2026 Budget for Collin County.
2. Included in this Budget were allocations for court personnel salaries for all 4 Justice of the Peace Courts.
3. Only the Justice of the Peace Court for Precinct 4 Court Administrator position was targeted for elimination/reclassification and such reclassification became

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effective as of October 1, 2025, demoting the incumbent and altering title, pay, benefits, and authority. This was done without consultation or agreement of Justice of the Peace Court for Precinct 4 .

4. The Commissioners Court left the budget line and FTE available for possible future reinstatement, making the basis for immediate elimination unclear and without agreement of the Justice of the Peace Court for Precinct 4.
5. Other Justice of the Peace precincts in Collin County retained their Court Administrator positions for the same budget cycle. Only the Justice of the Peace Court for Precinct 4 was singled out for a radical reduction in staff.
6. The Justice of the Peace for Precinct 4 Court Administrator's core duties include OCA reporting; auditor reporting; payroll coordination; implementing new laws; caseload/docket management; training/supervision of clerks; and records/technology coordination; as established and required by the Justice of the Peace Court for Precinct 4.
7. The majority of the clerks currently working in Justice of the Peace Court Precinct 4 were hired in 2024–2025 (several in 2025) and remain in training; one clerk has prior experience with another county. Administrator-level permissions and supervision are necessary for timely and accurate reporting and operations and approved by and required by the Justice of the Peace Court for Precinct 4.
8. Without interim relief, the Justice of the Peace Court for Precinct 4 faces imminent risks to statutory compliance, payroll accuracy, docket management, and training continuity, none of which can be fully remedied after the fact.
9. Justice of the Peace Court for Precinct 4, Judge Venegoni, also requests all records and documents relating to the above described matters, delivered to its counsels office, (1) True and full information regarding the status of the business and financial condition of the precincts 1-4; and (6) ALL Other information regarding the affairs of the precincts 1-4 of Collin County.

In this letter, and all future communications; the terms "document," "electronic or magnetic data" and "tangible thing" mean the following:

Document. "Document" means all written, typed, or printed matter and all magnetic, electronic, or other records or documentation of any kind or description in your and each recipient of this letter actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former directors, officers, employees, consultants, accountants, attorneys, or other agents, whether or not prepared by you, or any recipient of this letter, that constitute or contain matters relevant to the subject matter of the action. "Document" also includes, but is not limited to, the

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following: letters, reports, charts, diagrams, correspondence, telegrams, memoranda, e-mail, electronic mail, deleted e-mail, deleted electronic mail, notes, records, minutes, contracts, agreements, records or notations of telephone or personal conversations or conferences, interoffice communications, e-mail, microfilm, bulletins, circulars, pamphlets, photographs, faxes, invoices, tape recordings, computer printouts, drafts, résumés, logs, worksheets, 'Document' also includes, without limitation, a photocopy print, photostat and other replica of a document. The term "document" means and includes all original and all identical and nonidentical copies of any writing, film, photograph, tape, or recording of any nature whatsoever, regardless of where located, including but not limited to letters, memoranda, books, articles, agreements, notes, or other instruments of indebtedness, licenses, permits, applications, transcripts, reports, minutes, notes, agenda, regulations, instructions, directives, bulletins, newsletters, notices, manuals, brochures, charts, graphs, patents, calendars, appointment books, diaries, telephone call logs or notes, expense or travel vouchers, ledgers, books of account, financial records, purchase orders, audits, accountant's reports, bills, telegrams, teletypes, cables, photographs, motion pictures, photographic slides, drawings, microfilm, microfiche, tapes, cassettes, data processing cards, computer tapes or discs, computer printouts, information stored within data retrieval systems, press releases and materials published in newspapers or periodicals, drafts of any of the above, and all other written, printed, typed, or other graphic or recorded matter of any nature whatsoever.

Electronic or magnetic data. "Electronic or magnetic data" means electronic information that is stored in a medium from which it can be retrieved and examined and includes electronically stored information, electronic file, electronic storage and electronic information system. The term refers to the original (or identical duplicate when the original is not available) and any other copies of the data that may have attached comments, notes, marks, or highlighting of any kind. Electronic or magnetic data includes, but is not limited to, the following: computer programs; operating systems; computer activity logs; programming notes or instructions; e-mail receipts, messages, or transmissions; output resulting from the use of any software program, including word-processing documents, spreadsheets, database files, charts, graphs, and outlines; metadata; PIF and PDF files; batch files; deleted files; temporary files; Internet or web-browser-generated information stored in textual, graphical, or audio format, including history files, caches, and cookies; e-mail, electronic mail, deleted e-mail, deleted electronic mail, and any miscellaneous files or file fragments. Electronic or magnetic data also includes any items stored on magnetic, optical, digital, or other electronic-storage media, such as hard drives, floppy disks, CD-ROMs, DVDs, tapes, smart cards, integrated-circuit cards (e.g., SIM cards), removable media (e.g., Zip drives, Jaz cartridges), microfiche, punched cards, and any other newly devised or originated device. Electronic or magnetic data also includes the file, folder, tabs, containers, and labels attached to or associated with any physical storage device with each original or copy. Electronically stored information. The term "electronically stored information" means electronic information that is stored in a medium from which it can be retrieved and examined. It includes, but is not limited to, all electronic files that are

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electronically stored. "Electronic file" includes, but is not limited to, the following: voicemail messages and files; e-mail messages and files; text messages and files; deleted files; temporary files; system history files; Internet or web-browser-generated information stored in textual, graphical, or audio format, including history files, caches, and cookies; computer activity logs; metadata. Unless otherwise defined, each example used to illustrate the term "electronic file" will have the meaning assigned to it by Sedona Conference, Sedona Conference Glossary: eDiscovery & Digital Information Management, Fifth Edition, 21 Sedona Conf. J. 263 (2020), as defined herein, and the Texas Rules of Civil Procedure and any other Texas Rule or Law. "Electronic information system" refers to a computer system or network that contains electronic files and electronic storage. Unless otherwise defined, each example used to illustrate the term "electronic information system" will have the meaning assigned to it by Sedona Conference, Sedona Conference Glossary: eDiscovery & Digital Information Management, Fifth Edition, 21 Sedona Conf. J. 263 (2020), as defined herein, and the Texas Rules of Civil Procedure and any other Texas Rule or Law. "Electronic storage" refers to electronic files contained on magnetic, optical, or other storage media, such as hard drives, flash drives, DVDs, CDs, tapes, cartridges, floppy diskettes, smart cards, integrated circuit cards (e.g., SIM cards). Unless otherwise defined, each example used to illustrate the term "electronic storage" will have the meaning assigned to it by this letter and Sedona Conference, Sedona Conference Glossary: eDiscovery & Digital Information Management, Fifth Edition, 21 Sedona Conf. J. 263 (2020), as defined herein and the Texas Rules of Civil Procedure or Texas Rule or Law.

Tangible thing. The term "tangible thing" means a physical object that is not a document or electronic or magnetic data.

Demand is made for the reinstatement of all prior staff members and delivery of back pay and current pay to the staff of the Honorable Vincent J. Venegoni Jr. in his capacity as Justice of the Peace for Precinct 4. Please deliver all "documents," "electronic or magnetic data" and "tangible things" related to the reinstatement of all prior staff members and loss of back pay and current pay and loss to the staff of the Honorable Vincent J. Venegoni Jr. in his capacity as Justice of the Peace for Precinct 4, of any previously held positions in Justice of the Peace for Precinct 4.

Please contact me personally if you have any questions.

Respectfully, **MOSSER LAW PLLC**

/s/ James C. Mosser

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