

CAUSE NO. 296-09499-2025

THE HON. VINCENT J. VENEGONI, JR.,	§	IN THE DISTRICT COURT
JUSTICE OF THE PEACE, PRECINCT 4,	§	
IN HIS OFFICIAL CAPACITY,	§	
<i>PLAINTIFF,</i>	§	
	§	
V.	§	
	§	
COLLIN COUNTY COMMISSIONERS	§	
COURT,	§	429 TH JUDICIAL DISTRICT
CHRIS HILL, COUNTY JUDGE,	§	
SUSAN FLETCHER,	§	
COMMISSIONER PCT. 1,	§	
CHERYL WILLIAMS,	§	
COMMISSIONER PCT. 2;	§	
DARRELL HALE,	§	
COMMISSIONER PCT. 3,	§	
& DUNCAN WEBB,	§	
COMMISSIONER PCT. 4,	§	COLLIN COUNTY, TEXAS
IN THEIR OFFICIAL CAPACITIES,	§	
<i>DEFENDANTS.</i>	§	

**PLAINTIFF’S SUPPLEMENTED PETITION, REQUEST FOR AN
EMERGENCY TEMPORARY RESTRAINING ORDER, AND REQUEST FOR
INJUNCTIVE RELIEF**

Plaintiff, the Honorable Vincent J. Venegoni Jr. in his capacity as Justice of the Peace for Precinct 4, in Collin County Texas, files this supplemented petition and application for temporary restraining order and injunction against 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 alleges as follows:

DISCOVERY-CONTROL PLAN

1. Plaintiff intends to conduct discovery under level 3 of Texas Rule of Civil Procedure 190.4.

CLAIM FOR RELIEF

2. Plaintiff seeks nonmonetary relief.

PARTIES

3. Plaintiff, Vincent J. Venegoni Jr. in his capacity as Justice of the Peace for Precinct 4, residing in Collin County at 3033 Ohio Dr., Apt. 2019 Frisco, Texas 75035.
4. Defendant, Collin County Commissioners Court, may be served with process in Collin County at Administration Building, 2300 Bloomdale Rd., McKinney, Texas 75071 or wherever Defendant may be found.
5. Defendant Chris Hill in his capacity as County Judge, may be served with process at Administration Building, 2300 Bloomdale Rd., McKinney Texas 75071 or wherever Defendant may be found.
6. Defendant, Susan Fletcher in her capacity as County Commissioner for Precinct 1, may be served with process at Administration Building, 2300 Bloomdale Rd., McKinney Texas 75071.

7. Defendant, Cheril Williams in her capacity as County Commissioner for Precinct 2, may be served with process at Administration Building 2300 Bloomdale Rd., McKinney Texas 75071.
8. Defendant, Darrell Hale in his capacity as County Commissioner for Precinct 3, may be served with process at Administration Building 2300 Bloomdale Rd., McKinney Texas 75071.
9. Defendant, Duncan Webb in his capacity as County Commissioner for Precinct 4, may be served with process at Administration Building 2300 Bloomdale Rd., McKinney Texas 75071.

JURISDICTION

10. Pursuant to Article 5 Section 8 of the Texas Constitution, the District Court has general supervisory control over the Commissioners Court.

FACTS

11. On November 18, the Collin County Commissioners Court published the adopted FY 2026 Budget for Collin County.
12. Included in this Budget were allocations for court personnel salaries for all 4 Justice of the Peace Courts.
13. Only the Justice of the Peace Court for Precinct 4 Court Administrator position was targeted for elimination and reclassification and such reclassification became effective as of October 1, 2025, demoting the incumbent and altering title, pay, benefits, and authority.

14. The Commissioners Court left the budget and FTE (Full Time Equivalence) available for possible future reinstatement, making the basis for immediate elimination unclear.
15. 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.
16. The Justice of the Peace for Precinct 4 Court Administrator's core duties include OCA ("Office of Court Administration") reporting; auditor reporting; payroll coordination; implementing new laws; caseload/docket management; training and supervision of clerks; and records and technology coordination.
17. 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.
18. 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.

The Defendants violated Tex. Const. art. II, § 1

19. The individual members of the Commissioners Court are the proper defendants because they are the officials who carried out the actions in

question. In this case, the Commissioners Court members, by taking actions that disrupted judicial operations, acted beyond the scope of their lawful authority, making them personally liable under an ultra vires theory.

20. The Commissioners Court's targeted elimination and reclassification of the Precinct 4 Court Administrator position, effective October 1, 2025, and resulting in a demotion with changes to title, pay, benefits, and authority, impermissibly intrudes on the judiciary's constitutional privilege to manage its core operations, thereby violating the Texas Constitution's separation of powers.
21. Each justice of the peace may designate one or more individuals to serve as clerk of the justice court. The clerk is responsible for maintaining the docket for all cases filed in the justice court, keeping an index of all court judgments arising from justice-court cases, performing all duties required by law, and assisting the judge in handling matters before the court. Tex. Gov't Code Ann. § 27.056.
22. By selectively dismantling a key court management role for only one Justice of the Peace court while retaining the same role in other JP precincts for the same budget cycle, the **Commissioners Court exercised legislative budget authority in a manner that interferes with judicial administration and caseflow**, including OCA reporting, docket management, clerk training and supervision, and records and technology

coordination, functions integral to the court's ability to perform its judicial duties.

23. The intrusion is highlighted by the Commissioners Court's retention of the budget line and FTE for possible future reinstatement, which reveals no genuine fiscal necessity but rather discretionary control leveraged to affect the internal operations and administration of a specific court, creating imminent risks to statutory compliance, payroll accuracy, docket management, and training continuity that cannot be remedied after the fact.
24. These actions collectively reflect an exercise of legislative power that crosses into directing judicial functions and impairing the judiciary's ability to carry out its responsibilities independently, thus upsetting the constitutionally mandated separation among the legislative, executive, and judicial branches.

APPLICATION FOR EMERGENCY TEMPORARY RESTRAINING ORDER

The decision to Eliminate and Reclassify JP4's Court Administrator Position was Arbitrary and Capricious

25. Plaintiff's application for a temporary restraining order is authorized under the statute governing injunctive relief. Tex. Civ. Prac. & Rem. Code § 65.011(1). Given that the Commissioners Court's actions have already taken effect, there is not sufficient time to provide notice to Defendant and convene a hearing. Immediate intervention is therefore necessary to prevent further irreparable harm.

26. The Commissioners Court's decision to eliminate and reclassify the Justice of the Peace Court for Precinct 4's Court Administrator position, effective October 1, 2025, is arbitrary and capricious. It lacks a reasoned, evidence-based justification, departs from consistent treatment across similarly situated JP courts, and threatens immediate, irreparable operational harm to statutory compliance and core court functions.

Immediate and Irreparable Operational Harm Demonstrates Capriciousness

27. Precinct 4 faces imminent risks to statutory compliance, payroll accuracy, docket management, and training continuity, harms that cannot be fully remedied after the fact. Missed or inaccurate reports, payroll errors affecting public funds and employee rights, disrupted dockets, and derailed training create compliance exposure and public confidence harms that are not adequately compensable. Proceeding with the elimination of this position despite these foreseeable harms, and despite the availability of the budget line and FTE, reflects an arbitrary disregard of material consequences.

The Adopted Budget Undercuts Any Claimed Necessity for Elimination

28. On November 18, the Commissioners Court published the adopted FY 2026 Budget for Collin County reflecting allocations for court personnel salaries for all four Justice of the Peace Courts. The budget expressly contemplated continued staffing of these courts, including the administrator-level function. Having adopted and published a budget that funds these positions, the targeted elimination of only Precinct 4's Court Administrator is inconsistent

with the County's own fiscal planning and lacks a transparent budgetary rationale.

Singular Targeting of Precinct 4 Is Unexplained and Inconsistent

29. Only the Precinct 4 Court Administrator position was selected for elimination and reclassification, resulting in a demotion and changes to title, pay, benefits, and authority. Meanwhile, the other JP precincts retained their Court Administrator positions for the same budget cycle. Singling out Precinct 4 for a radical reduction in staff, despite the uniform budgetary allocations and the functional parity of the four JP courts, reflects disparate treatment without a stated basis or articulated performance, workload, or fiscal justification. Arbitrary treatment of similarly situated governmental units is a hallmark of capricious decision-making.

The Retention of the Budget Line and FTE Confirms the Lack of a Reasoned Basis

30. The Commissioners Court left the budget line and FTE available for possible future reinstatement. If the position is unnecessary or unsustainable, there is no reason to keep the allocation and FTE open. Conversely, if the position is needed, there is no reason for its immediate elimination. Maintaining the capacity to reinstate while simultaneously eliminating the role underscores the absence of a coherent rationale and suggests a decision made without careful evaluation of operational needs.

The Functions at Stake Are Core, Ongoing, and Not Readily Redistributed

31. The Precinct 4 Court Administrator’s core duties are essential to lawful, timely, and accurate court operations. These duties require administrator-level permissions, judgment, and continuity. The Commissioners Court provided no plan identifying how these duties would be performed after the elimination, who would assume administrator-level authorities, or how compliance deadlines would be met. Eliminating the position in the face of these ongoing statutory and operational requirements, without an alternate structure, reflects a failure to consider relevant factors.

Precinct 4’s Staffing Realities Heighten the Risk and Render the Decision Irrational

32. The majority of Precinct 4 clerks were hired in 2024–2025 and remain in training, with only one clerk having prior experience with another county. At this stage, administrator-level permissions and direct supervision are necessary to ensure an accurate and stable docket. The Commissioners Court’s choice to remove the sole role designed to provide that oversight, while other precincts retain theirs, ignores the actual conditions in Precinct 4 and foreseeably impairs compliance and service delivery.

REQUEST FOR TEMPORARY INJUNCTION

33. Plaintiff asks the Court to set his application for temporary **injunction** for a hearing and, after the hearing, issue a temporary **injunction** against defendant..

REQUEST FOR PERMANENT INJUNCTION

34. Plaintiff asks the Court to set his request for a permanent **injunction** for a full trial on the merits and, after the trial, issue a permanent injunction against the defendants.

Conclusion

35. The Commissioners Court adopted a budget that financed all JP courts, yet **exclusively targeted** Precinct 4's Court Administrator for elimination while retaining the budget line and FTE for potential reinstatement. It provided no clear rationale, ignored the essential nature of administrator-level duties, and discounted the known training needs of a largely new clerk staff. The decision departs from consistent treatment of similarly situated courts and creates immediate, non-remediable harm to the lawful operation of Justice of the Peace Precinct 4. On this record, the elimination and reclassification is arbitrary and capricious. Interim relief maintaining the status quo is warranted to preserve statutory compliance and core court functions pending a reasoned determination.

Respectfully Submitted by **Mosser Law PLLC**,

/s/ Jacob R. Barfield

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served in accordance with Rule 21 and 21a of the Texas Rules of Civil Procedure.

/s/ Jacob R. Barfield

Jacob R. Barfield

Automated Certificate of eService

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Filing Description: Plaintiff's Supplemented Petition, Request for An Emergency Temporary Restraining Order, and Request for Injunctive Relief

Status as of 12/19/2025 10:28 AM CST

Case Contacts

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