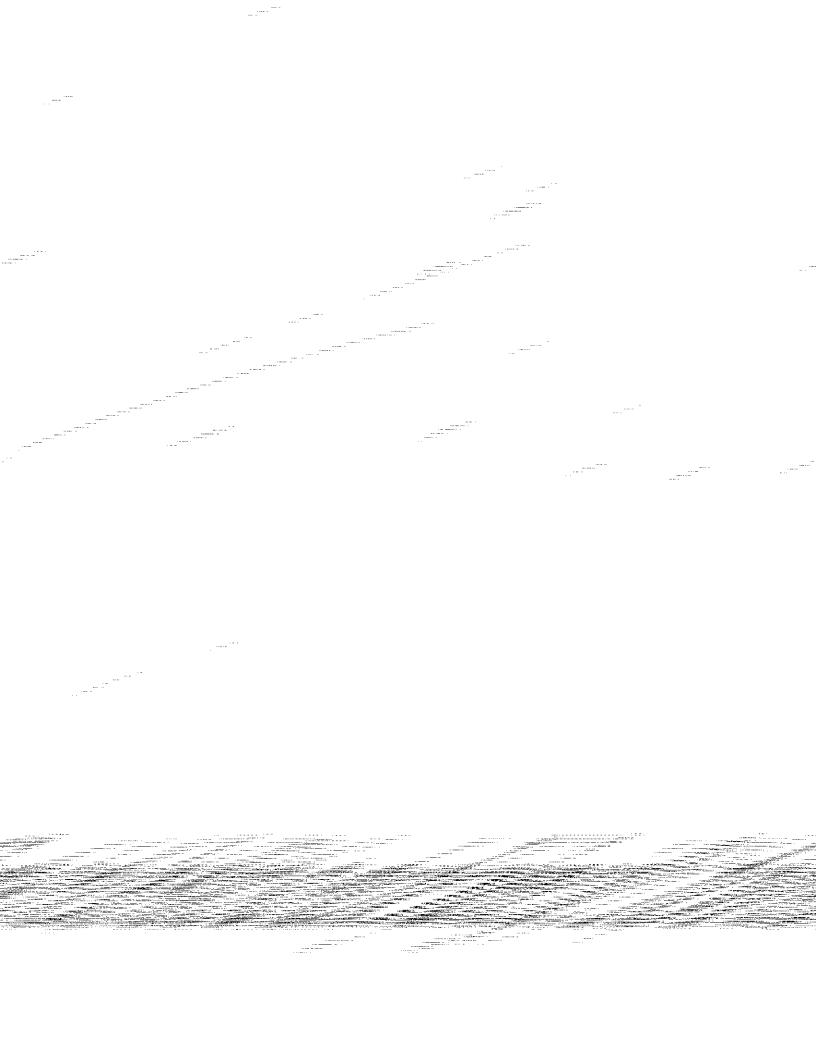
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Ms. Stanley and inquired about procedures for claiming lottery winnings. At Ms. Stanley's direction, Mr. Sadler also asked if the winner's name could be withheld from the public and was told it could not. At the conclusion of this conference, Mr. Sadler took the winning lottery ticket and placed it in the law firm's safe for safekeeping for Ms. Stanley.

VI.

The following week, on or about October 17, 1994, Ms. Stanley returned to Respondent's office and consulted with Respondent regarding the dissolution of her marriage. During that initial consultation, Ms. Stanley advised Respondent that she had purchased the winning lottery jackpot ticket for the October 8. 1994, lottery drawing, and that the ticket represented \$4.3 million dollars in winnings that would be paid out over time. Respondent and Ms. Stanley discussed her living situation. Respondent knew or had reason to believe, as a result of that conversation, that Ms. Stanley resided at the prother and sister-in-law in Henderson, Rusk County, Texas.

VII.

On or about October 20, 1994, Respondent filed an Original Petition to Annul Marriage, or in the Alternative, a Petition for Divorce (the "Petition") on behalf of Ms. Stanley. In the Petition, Respondent alleged that Ms. Stanley resided at 107 Bunyon, Henderson, Rusk County. Texas, although he had been informed during the initial interview with Ms. Stanley that she resided at and/or was staying part of the time with her brother and sister-in-law in Henderson, Rusk County, Texas. The Bunyon Street property is estate property managed by Respondent and owned by another of Respondent's client's. At the time Respondent filed the Petition on behalf of Ms. Stanley, the house on the Bunyon Street property

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On or about January 18, 1995, Ms. Stanley and Respondent appeared in court for a prove-up hearing on the annulment. Respondent allowed Ms. Stanley to testify falsely when she testified that she resided at that address. There were no utilities turned on at 107 Bunyon Street during the time Ms. Stanley testified she lived there. Respondent, aware of the lottery winnings, assisted Ms. Stanley in failing to disclose to the tribunal the existence of a material and substantial asset of the community property and furthering the scheme of Respondent and Ms. Stanley to withhold from Mr. Riney the existence of the lottery ticket, until such time as Ms. Stanley could hope to claim the lottery ticket as separate property. By allowing his client to testify that she and her husband did not accumulate any community property during the marriage, other than personal property, without eliciting testimony that advised the court of the existence of the lottery ticket, Respondent furthered the scheme to deceive the court and Mr. Riney.

XII.

Respondent prepared a fraudulent Decree of Annulment stating that, "...no community property was accumulated by the parties during the existence of the marriage other than personal effects." Respondent knew, at the time he prepared the decree and at the prove-up hearing when he presented the decree to the judge for his signature, that his client was holding the winning lottery ticket worth \$4.3 million dollars. Respondent knew Ms. Stanley had purchased the lottery ticket during her marriage to Mr. Riney with wages and/or tips from her job. Respondent further knew that his client had concealed the substantial material change to their community property estate from her husband, and Respondent failed to disclose that fact to the court.

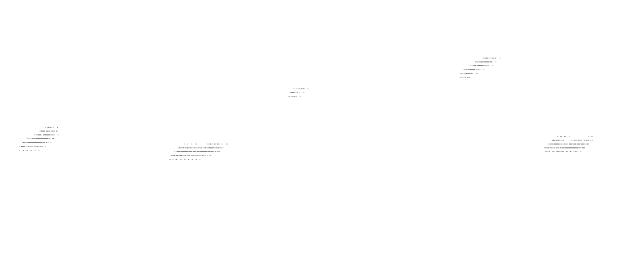
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