

CAUSE NUMBER 13-03-03249-CR

THE STATE OF TEXAS

§

VS.

§

RONALD EUGENE REYNOLDS

§

2014 JUL 21 PM 3:05  
IN THE 221<sup>ST</sup> DISTRICT  
COURT OF MONTGOMERY  
COUNTY, TEXAS

**STATE'S NOTICE OF INTENTION TO INTRODUCE EVIDENCE OF  
PRIOR CONVICTIONS, EXTRANEOUS OFFENSES AND OTHER BAD  
ACTS**

Comes now the State of Texas, by and through the undersigned Assistant District Attorney for Montgomery County, Texas, and hereby serves notice on this Court and the Defendant, through Defense Counsel, of its intent to offer evidence that may be construed as evidence of other crimes, wrongs, or acts pursuant to Tex. R. EVID. 404(b), or evidence attacking the credibility of a witness, pursuant to Tex. R. EVID. 609, or any and all evidence relevant to the punishment of the defendant after a finding of guilt, pursuant to Art. 37.07 of the Tex. Code of Criminal Procedure. To Wit:

1. That on or about February 9, 2005 Ronald Eugene Reynolds, in case number H0120316945, in Travis County, Texas, received a partially probated suspension of his license to practice law from the State Bar of Texas for violations of the Texas Disciplinary Rules of Professional Conduct: Rules 1.01(b)(1), 1.01(b)(2), 1.03(a). Reynolds received an active suspension from March 31, 2006 until June 30, 2006. Reynolds received a probated suspension from July 01, 2006 until June 30, 2009.
2. That on or about November 22, 2005 Ronald Eugene Reynolds, in case number #H0020519586, in Travis County, Texas, received a partially probated suspension of his license to practice law from the State Bar of Texas for violations of the Texas Disciplinary Rules of Professional Conduct: Rules 1.01(b)(2); 1.03(a), 1.03(b), 1.14(a), 1.14(b), 8.04(a)\*3). Reynolds received an active suspension from March 31, 2006 until June 30, 2006. Reynolds received a probated suspension from July 01, 2006 until June 30, 2009.
3. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his Personal Financial Statement that was due February 11, 2008, in a timely manner. Referred to the Attorney General's Office April 8, 2008 for collection because of continued non-compliance.
4. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his 8-Day Pre-election Finance Report that was due July 15, 2008, in a timely manner. Referred

SCANNED



to the Attorney General's Office October 20, 2008 for collection because of continued non-compliance.

5. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his Semiannual Campaign Finance Report that was due January 15, 2009 in a timely manner. Referred to the Attorney General's Office March 5, 2009 for collection because of continued non-compliance.
6. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his Personal Financial Statement that was due February 16, 2010, in a timely manner. Referred to the Attorney General's Office April 27, 2010 for collection because of continued non-compliance.
7. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his 8-Day Pre-election Campaign Finance Report that was due February 22, 2010, in a timely manner. Referred to the Attorney General's Office April 12, 2010 for collection because of continued non-compliance.
8. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his Semiannual Campaign Finance Report that was due July 15, 2010, in a timely manner. Referred to the Attorney General's Office September 1, 2010 for collection because of continued non-compliance.
9. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his 30-Day Pre-election Campaign Finance Report that was due October 4, 2010, in a timely manner. Referred to the Attorney General's Office November 16, 2010 for collection because of continued non-compliance.
10. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his Semiannual Campaign Finance Report that was due July 16, 2012, in a timely manner. Referred to the Attorney General's Office October 12, 2012 for collection because of continued non-compliance.
11. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his Personal Financial Statement that was due April 18, 2012, in a timely manner. Referred to the Attorney General's Office August 10, 2012 for collection because of continued non-compliance.
12. That Ronald Eugene Reynolds, in Travis County, Texas, did not file his Personal Financial Statement that was due July 1, 2013 in a timely manner. Referred to the Attorney General's Office August 27, 2013 for collection because of continued non-compliance.
13. That on May 16, 2009, in Travis County, Texas, the Texas Ethics Commission terminated the campaign treasurer of Ronald Eugene Reynolds and Reynolds continued to make campaign expenditures and accept campaign contributions



without having an active campaign treasurer appointment on file, in violation of Section 253.031 of the Texas Election Code.

14. That Ronald Eugene Reynolds, on or about February 19, 2009, in the 126<sup>th</sup> District Court of Travis County, Texas, in cause number D-1-GV-08-002819, a Default Judgment was entered against the defendant for \$12,500 to recover civil penalties assessed by the Texas Ethics Commission.
15. On October 11, 2011, in Cause Number D-1-GV-11-001569, filed in the 126<sup>th</sup> District Court of Travis County, Texas, the State of Texas obtained a writ of garnishment against the defendant for the recovery of \$12,500 in civil penalties assessed by the Texas Ethics Commission.
16. On November 12, 2013 in Cause Number D-1-GV-12-001652, filed in the 126<sup>th</sup> District Court of Travis County, Texas, the State of Texas obtained a writ of garnishment against the defendant for the recovery of \$9,400 in civil penalties assessed by the Texas Ethics Commission.
17. That Ronald Eugene Reynolds, on or about October 15, 2008, in a Toll Road Authority Administrative Hearing, in Fort Bend County, Texas in proceeding number 08 CTR 001741, was found to have operated his motor vehicle on a Fort Bend County Toll Road on or about June 5, 2006; December 21, 2006; April 2, 2006; July 14, 2008; July 15, 2008 and August 11, 2007 without paying the required toll charge.
18. That Ronald Eugene Reynolds, on or about May 24, 2013, in a Toll Road Authority Administrative Hearing, in Fort Bend County, Texas in proceeding number 13 CTR 010780, was found to have operated his motor vehicle on a Fort Bend County Toll Road on or about February 20, 2012; September 29, 2011; July 30, 2012; July 31, 2012; July 31, 2012; August 2, 2012; August 4, 2012; August 7, 2012; August 2, 2012; August 11, 2012; August 18, 2012; August 15, 2012 and August 28, 2012 without paying the required toll charge.
19. That Ronald Eugene Reynolds, on or about June 18, 1999, in County Civil Court at Law Number Two of Fort Bend County, Texas, in cause number 17774, was ordered to surrender his 1995 BMW 318is, license plate SNG17V, or disclose its exact whereabouts to the Fort Bend County Sheriff or Constable for defaulting under the terms of the Note, by failing to make payments due on December 10, 1998 and all other subsequent payments.
20. That Ronald Eugene Reynolds, on or about September 15, 2005, in the 125<sup>th</sup> District Court of Harris County, Texas, in cause number 2005-48518, was sued by Advanced Solutions and Home Run Funding for Breach of Contract, Conversion, Violation of the Texas Theft Liability Act, Fraudulent Inducement, Constructive Trust, Money Had and Received, Unjust Enrichment, Negligent Hiring, Tortious Interference, Negligent Misrepresentation, and Conspiracy. The lawsuit alleges that



Ronald Reynolds and other members of his law firm, in Harris County Texas, carried out a scheme wherein they obtained and then falsified accident reports and created fraudulent MRI and other medical reports in order to induce Advanced Solutions and Home Run Funding to advance monies to allegedly legitimate "clients" of the law firm. On November 20, 2006 an Agreed Judgment was issued against Ronald Reynolds and other members of his law firm in the amount of \$233,673.51.

21. That Ronald Eugene Reynolds, on or about May 26, 2005, in the 129<sup>th</sup> District Court of Harris County, Texas, in cause number 2005-34959, was sued by Barry Ward, Karen Dillingham, Tusar Townsend and Kerry Gladney for legal malpractice. On August 7, 2006 the case was dismissed after an undisclosed settlement was reached between the parties.
22. That Ronald Eugene Reynolds, on or about March 5, 2009, in the 113<sup>th</sup> District Court of Harris County, Texas, in cause number 2005-27437, was found to have maliciously caused harm to Alice S. Grimes by failing to properly handle her civil lawsuit and by lying to her about the results of her case. On March 31, 2009, Ronald Reynolds was ordered to pay Alice Grimes \$100,000 in actual damages and \$50,000 in punitive damages.
23. That Ronald Eugene Reynolds, on or about January 7, 2010, in the 270<sup>th</sup> District Court of Harris County, Texas, in cause number 2010-01184, was sued by Summit Health Management for Conversion, Theft, Fraud, Negligent Misrepresentation, Breach of Contract, Quantum Meruit and Unjust Enrichment. The lawsuit that Ronald Reynolds engaged in a continuing pattern or fraudulent activity, failing to notify plaintiff of settlements or material events as they occurred on claims, and building up the debt owed to plaintiff while commingling and using funds obtained as a result of plaintiff's services.
24. That Ronald Eugene Reynolds, on or about April 29, 2011, in the 129<sup>th</sup> District Court of Harris County, Texas, in cause number 2011-26170, the defendant was charged by the Commission For Lawyer Discipline with acts and omissions that constitute professional misconduct as defined by Rule 1.01(b)(1), 1.03(a), and 1.14(b) of the Texas Rules of Disciplinary Procedure.
25. That Ronald Eugene Reynolds, on or about October 1, 2013, in the 165<sup>th</sup> District Court of Harris County, Texas, in cause number 2012-21547, was sued by Tiffany Goodsen Johnson for Negligence, Breach of Fiduciary Duty, Fraud, Breach of Contract, Deceptive Trade Practices. The lawsuit alleges that on or about June 26, 2009, in Harris County, Texas Ronald Reynolds was hired by Johnson to represent her in a personal injury claim. Reynolds entered into a settlement agreement without the knowledge or consent of Johnson.



26. That Ronald Eugene Reynolds, on or about February 6, 2013, in the 80<sup>th</sup> District Court of Harris County, Texas, in cause number 2013-07159, was sued by Sara Braulio for legal malpractice, breach of contract, constructive fraud, fraud by non-disclosure, breach of fiduciary duty, violation of the Texas Deceptive Trade Practices Act, and the Theft. The lawsuit alleges that on or about February 29, 2012, in Harris County, Texas Ronald Reynolds was hired by Braulio to represent her in a personal injury claim. Reynolds settled the claim without the consent or knowledge of Braulio. Reynolds was alleged to have forged the signatures of Braulio and her juvenile son and received two checks in the amounts of \$10,250 and \$3,150. Reynolds cashed the checks and never turned them over to Braulio. Braulio was never told about the settlement and only found out about it after she hired other attorneys to handle her claim. Reynolds settled with Braulio on May 5, 2014 and agreed to pay her \$20,000.
27. That Ronald Eugene Reynolds, on or about April 29, 2013, in the 11<sup>th</sup> District Court of Harris County, Texas, in cause number 2013-25515, was sued by Memorial MRI & Diagnostic for breach of fiduciary duty, breach of contract, and fraud. The lawsuit alleges that in Harris County, Texas Ronald Reynolds requested Memorial MRI and Diagnostic perform medical services for his clients. Reynolds agreed to pay each client's medical bills upon settlement of the claims and receipt of the settlement proceeds. Reynolds refused to make any payments for the medical bills after settling the claims and receiving the proceeds. On October 10, 2013 a final judgment was issued and Reynolds agreed to pay Memorial MRI and Diagnostic \$172,869.
28. That Ronald Eugene Reynolds, on or about June 17, 2013, in the 129<sup>th</sup> District Court of Harris County, Texas, in cause number 2013-35870, was sued by Alexei Fomine for breach of fiduciary duty, breach of contract, and fraud. The lawsuit alleges that in Harris County, Texas Ronald Reynolds requested Alexei Fomine perform medical services for his clients. Reynolds agreed to pay each client's medical bills upon settlement of the claims and receipt of the settlement proceeds. Reynolds refused to make any payments for the medical bills after settling the claims and receiving the proceeds.
29. That Ronald Eugene Reynolds, on or about February 27, 2014, in the 11<sup>th</sup> District Court of Harris County, Texas, in cause number 2014-10124, was sued by Ameri Health Care Clinics for breach of fiduciary duty and breach of contract. The lawsuit alleges that in Harris County, Texas Ronald Reynolds requested Ameri Health Care Clinics perform medical services for his clients. Reynolds agreed to pay each client's medical bills upon settlement of the claims and receipt of the settlement proceeds. Reynolds refused to make any payments for the medical bills after settling the claims and receiving the proceeds.
30. That Ronald Eugene Reynolds, on or about March 26, 2014, in the 152<sup>nd</sup> District Court of Harris County, Texas, in cause number 2014-16437, was sued by Pacific Health Clinic for breach of fiduciary duty and breach of contract. The lawsuit



alleges that in Harris County, Texas Ronald Reynolds requested Pacific Health Clinic perform medical services for his clients. Reynolds agreed to pay each client's medical bills upon settlement of the claims and receipt of the settlement proceeds. Reynolds refused to make any payments for the medical bills after settling the claims and receiving the proceeds.

31. That Ronald Eugene Reynolds, in Harris County, Texas, on or about April 16, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Adrienne Anderson for purposes of providing legal representation, with Marcela Halmagean, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Marcela Halmagean, nor anyone acting on behalf of Marcela Halmagean, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
32. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about February 27, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Barry Dotson, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Barry Dotson, nor anyone acting on behalf of Barry Dotson, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
33. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about February 24, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Gerald Spikes, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Gerald Spikes, nor anyone acting on behalf of Gerald Spikes, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
34. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about March 7, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Carla Robertson, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Carla Robertson, nor anyone acting on behalf



of Carla Robertson, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.

35. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about February 18, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Cole Dushane, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Cole Dushane, nor anyone acting on behalf of Cole Dushane, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
36. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about March 19, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Jose Benitez, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Jose Benitez, nor anyone acting on behalf of Jose Benitez, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
37. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about February 24, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Khoi Phan, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Khoi Phan, nor anyone acting on behalf of Khoi Phan, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
38. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about May 8, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Michael Anderson, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Michael Anderson, nor anyone acting on behalf of Michael Anderson, had requested the communication; and the conduct of Ronald



Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.

39. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about February 27, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Yolanda Spikes, a prospective client, concerning legal representation arising out of a "slip and fall" accident in Harris County, Texas, when neither Yolanda Spikes, nor anyone acting on behalf of Yolanda Spikes, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
40. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about November 27, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Damian Adams, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Damian Adams, nor anyone acting on behalf of Damian Adams, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
41. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about November 27, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Michelle Carry, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Michelle Carry, nor anyone acting on behalf of Michelle Carry, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
42. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about November 27, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Larry Clark, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Larry Clark, nor anyone acting on behalf of Larry Clark, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.



43. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about February 28, 2013, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Ricardo Rocha, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Ricardo Rocha, nor anyone acting on behalf of Ricardo Rocha, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
44. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about February 2, 2013, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Ruben Tamez, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Ruben Tamez, nor anyone acting on behalf of Ruben Tamez, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
45. That Ronald Eugene Reynolds, in Montgomery County, Texas, on or about February 6, 2013, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Ruben Tanner, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Ruben Tanner, nor anyone acting on behalf of Ruben Tanner, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.
46. That Ronald Eugene Reynolds, on or about November 27, 2012, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Destiny Trevino, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Destiny Trevino, nor anyone acting on behalf of Destiny Trevino, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.



47. That Ronald Eugene Reynolds, on or about February 2, 2013, did then and there unlawfully, with the intent to obtain an economic benefit, knowingly, in person and by telephone, solicit employment for himself by communicating directly or indirectly through Robert Valdez and Crystal Valdez for purposes of providing legal representation, with Rebecca Vasconcelos, a prospective client, concerning legal representation arising out of a motor vehicle accident in Harris County, Texas, when neither Rebecca Vasconcelos, nor anyone acting on behalf of Rebecca Vasconcelos, had requested the communication; and the conduct of Ronald Reynolds was not authorized by the Texas Disciplinary Rules of Professional Conduct or any rule of court.

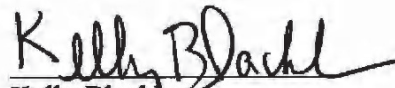
Respectfully Submitted,



Kelly Blackburn  
Assistant District Attorney  
Montgomery County, Texas

#### **CERTIFICATE OF SERVICE**

I, the undersigned Assistant District Attorney, hereby certify that a true and correct copy of the foregoing Notice was mailed by certified mail, return receipt requested/Faxed to the attorney for the defendant on the 21<sup>st</sup> day of July, 2014.



Kelly Blackburn  
Assistant District Attorney  
Montgomery County, Texas