

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

***VIA UPS GROUND; and
VIA EMAIL: blake.hawthorne@txcourts.gov***

April 8, 2021

Blake Hawthorne
Supreme Court of Texas
Supreme Court Building
201 West 14th Street, Room 104
Austin, Texas 78701

Re: Resignation of Richard E. Jackson – State Bar No. 10492980

Dear Mr. Hawthorne:

Pursuant to Part X of the Texas Rules of Disciplinary Procedure, please find enclosed herewith the following:

- 1) Motion for Acceptance of Resignation as Attorney and Counselor at Law signed by Richard E. Jackson, dated March 11, 2021;
- 2) Response of the Chief Disciplinary Counsel of the State Bar of Texas to Motion for Acceptance of Resignation in Lieu of Discipline of Richard E. Jackson, a copy of which was emailed by and through his attorney of record, Robert Hinton, dated February 2, 2021;
- 3) Acknowledgement of Receipt and Waiver of Ten-Day Period for Withdrawal of Motion for Acceptance of Resignation signed by Richard E. Jackson, dated March 11, 2021;
- 4) Original and one (1) copy of a proposed Order for review and entry by the Court accepting the resignation of Richard E. Jackson as Attorney and Counselor at Law; and

Mr. Blake Hawthorne
Supreme Court of Texas
Resignation of Richard E. Jackson
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Please present the enclosed Order to the Court for review and entry. Upon entry of the Order by the Court, please transmit a true and correct copy of the same to me in order that this office may properly give notice to all parties of the Court's disposition of such motion.

Sincerely,

/s/ Kristin V. Brady
Kristin V. Brady
Assistant Disciplinary Counsel

Enclosures (as stated)

cc: Richard E. Jackson
c/o Robert C. Hinton Jr.
Via Email: hinton.law@airmail.net

Nina Hess Hsu
Via Email: Nina.HessHsu@txcourts.gov

Sherma J. Clery
Via Email: Sherma.Clery@txcourts.gov

Brad Sonogo
Via Email: Brad.Sonogo@txcourts.gov

MISC. DOCKET NO. _____

IN THE SUPREME COURT OF TEXAS

**MOTION FOR ACCEPTANCE OF RESIGNATION AS
ATTORNEY AND COUNSELOR AT LAW
OF
RICHARD E. JACKSON**


NOW COMES Applicant Richard E. Jackson, State Bar No. 10492980, and hereby resigns as Attorney and Counselor at Law in the State of Texas. Applicant hereby submits to the Court his resignation as an Attorney and Counselor at Law, and prays that this Court accept said resignation.

Attached hereto are the law license and permanent State Bar Card issued by this Court to Applicant, which are hereby surrendered by Applicant.

Heretofore, in July, 2013, Applicant voluntarily placed his Texas Law License into inactive status with the State Bar of Texas, and ceased to practice law before that point forward.

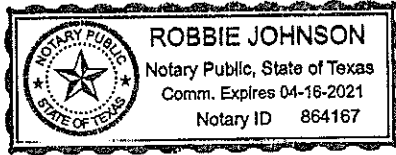
Applicant is voluntarily resigning and withdrawing from the practice of law, and does so in lieu of discipline. While Applicant vehemently denies all allegations in the pending disciplinary action, Applicant simply cannot financially afford to continue to defend himself in this action.

Applicant prays that his name be dropped and deleted from the list of persons licensed to practice law in Texas, and that his resignation be accepted by this Court.



RICHARD E. JACKSON
State Bar No. 10492980

SUBSCRIBED AND SWORN TO before me by the said Richard E. Jackson on this the 11th day of March, 2021 to certify which witness my hand and seal of office.



Robbie Johnson

Notary Public in and for
The State of Texas

**IN THE SUPREME COURT OF TEXAS
RESPONSE TO MOTION FOR ACCEPTANCE OF RESIGNATION AS
ATTORNEY AND COUNSELOR AT LAW**

OF

RICHARD E. JACKSON

TO THE HONORABLE SUPREME COURT OF TEXAS:

Pursuant to the Texas Rules of Disciplinary Procedure, the Chief Disciplinary Counsel of the State Bar of Texas, acting by and through the Commission for Lawyer Discipline, hereby files this Response to the Motion for Acceptance of Resignation in lieu of discipline filed by RICHARD E. JACKSON, State Bar No. 10492980, and would show as follows:

I.

The acceptance by the Court of the Resignation of RICHARD E. JACKSON is in the best interest of the public and of the profession.

II.

The following allegations of Professional Misconduct are pending:

Commission for Lawyer Discipline v. Richard E. Jackson, Case Number 201806646

Beginning in 1999, Respondent was the lead assistant district attorney assigned to prosecute Stanley Mozee (Mozee) and Dennis Allen (Allen) for the murder of Reverend Jesse Borns, Jr. Respondent failed to disclose evidence that tended to negate the guilt of Mozee and Allen to defense counsel. Specifically, the allegations are that Respondent failed to make timely disclosure to the defense, agreements Respondent made with informants in exchange for their favorable testimony for the State; details related to eyewitnesses' identification or description of Mozee and Allen or alleged suspect; and, interview reports or statements from eyewitnesses.

The above facts support a violation of Rule 3.09(d) of the Texas Disciplinary Rules of Professional Conduct.

III.

WHEREFORE, the State Bar of Texas moves the Court to accept the resignation in lieu of discipline and grant the motion filed by Applicant.

Respectfully submitted,

Seana Willing
Chief Disciplinary Counsel

Kristin V. Brady
Assistant Disciplinary Counsel

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State Bar of Texas
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Dallas, Texas 75254
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/s/Kristin V. Brady

Kristin V. Brady
State Bar No. 24082719

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served upon Respondent, Richard E. Jackson, by and through his attorney of record, Robert Hinton., on this the 2nd day of February, 2020, via email (Hinton.law@airmail.net).

/s/Kristin V. Brady

Kristin V. Brady

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IN THE SUPREME COURT OF TEXAS

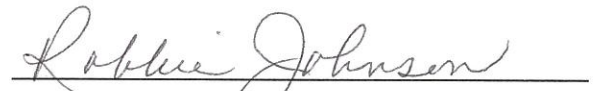
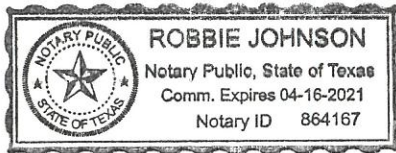
**ACKNOWLEDGMENT OF RECEIPT
AND WAIVER OF TEN-DAY PERIOD
FOR WITHDRAWAL OF MOTION FOR ACCEPTANCE OF RESIGNATION**

I, RICHARD E. JACKSON, have this day received a copy of the Response to Motion for Acceptance of Resignation as Attorney and Counselor at Law from the Commission for Lawyer Discipline through the Office of Chief Disciplinary Counsel. I have reviewed the Commission's Response in its entirety. I hereby waive the ten (10) day period in which to request withdrawal of my motion for acceptance of resignation under Rule 10.02 of the Texas Rules of Disciplinary Procedure.



RICHARD E. JACKSON
State Bar No. 10492980

SUBSCRIBED AND SWORN to before me by the said RICHARD E. JACKSON on this the 11th day of March, 2021, to certify which witness my hand and seal of office.



NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS