

**Office of Chief Disciplinary Counsel (TxCDC)  
State Bar of Texas**

Brian P. Carr Complainant  versus  George Monroe Padis Bar Card Number: 24088173 Subject of the Complaint	Ethics Violations In United States District Court Northern District Of Texas (TXND)  Civil No. 3-23CV2875 - S
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**Complaint Against George Padis, 24088173**

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## **Introduction**

### **Complaint Against George Padis**

This is a complaint against an attorney, George Padis, who is a member of the Texas Bar Association with bar card number 24088173 and his ethics violations in a case before the United States District Court, Northern District Of Texas (TXND), 3:23-cv-02875-S. Mr. Padis made demonstrably false statements in government emails (a federal crime under [18 USC § 1001](#)) as well in court filings violating [FRCP Rule 11](#).

### **Entire Record Available on The Internet**

There is a web page at:

[https://governmentoflaw.info/3\\_23-cv-02875-S/TimeLine.html](https://governmentoflaw.info/3_23-cv-02875-S/TimeLine.html)

which has descriptions of each document filed in 3:23-cv-02875-S along with a link to the actual document. It has also has descriptions and links to the separate four general complaints submitted to the Texas Bar Association as well as this document itself ([CDCPdV](#)). There was a previous complaint against Mr. Padis filed with TxCDC as [PadisComplaint](#) which contained broad contextual information and discussed apparent collusion between the Department of Justice (DoJ) and the referenced court (TXND). If additional contextual information is required to understand the specific ethics violations described in this complaint, the

previous complaint should have that information.

### **Previous Submission Classified as Inquiry, No Ethics Violations Identified**

Even though the previous complaint contained clear and specific affirmed statements concerning false statements made by Mr. Padis to myself and in court filings, the previous complaint was rejected because they were unable to identify any violations of the Texas Disciplinary Rules of Professional Conduct<sup>1</sup> and was treated as an inquiry permitting submission of a revised complaint within 20 days.

### **Mr. Padis Falsely Claims in Email No Record of Service**

TXND [3:23-cv-02875-S](#), was filed in late 2023 when it was clear that USCIS had left my wife in dire circumstances with no other recourse. A few days before the DoJ response to the Complaint was due, on 1 Mar 2024 Mr. Padis sent me an email ([ECF28-1](#)) which stated that the USATXN:

Office has no record of having been served in this case...

a party must deliver a copy of the summons and the complaint to the United States attorney...

If you reply with a summons and a copy of the complaint, I will email you a letter confirming that I am accepting service on behalf of the U.S. Attorney.

Mr. Padis was falsely claiming that he did not have access to any copy of the complaint when in fact he had access to two physical copies and both the court and I had records demonstrating that the copies were in fact delivered to the USATXN office.

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<sup>1</sup> This response was sent via U.S. mail with a watermark Confidential cover sheet. It appears that this was a discretionary confidential and not binding on actual recipients but until my questions / concerns are answered by TxCDC, there is only a paraphrase of the response. It is hoped that an electronic copy of the actual response document will be available on the web in the [TimeLine](#) at some future date.

However, I took his claim on face value (as it was in a government email and it is a crime to make false statements in a government record) and sent him electronic copies of the complaint and summons as well as the USCIS decision which granted my wife both a 10 year green card as well as citizenship ([ECF10-5](#)) and explained that instead of my wife getting her Certificate of Naturalization USCIS had instead left her as as apparent illegal and that she was terrified of being arrested and deported without cause or notice.

Mr. Padis never sent the promised letter accepting service but instead just responded to the complaint with a woefully inadequate Motion to Dismiss (MTD) on 8 Mar 2024, [ECF15](#), which will be discussed in the next section due to its own false and misleading claims.

**Mr. Padis Admits That Documents Were Delivered, Questions Propriety**  
Mr. Padis' claim that his 'office has no record of having been served in this case' was obviously false as it was a logical fallacy. Only an omniscient being could simultaneously check every part of a finite space (e.g. the office) and verify that no record in any form (e.g. a misfiled post-it note or a security video of the package being delivered) was present at any particular time.

In later discussion concerning sanctions for the obviously false statement in his government email (see email thread in [ECF30-1](#)) on 26 April 2024 Mr. Padis claimed:

I indicated I believed that service was improper and offered to accept service as one of the copies was incorrectly recorded by USATXN as having been served by myself rather than my friend who had agreed to deliver / serve and who did in

fact hand the papers to the correct individual.

According to Black's Law Dictionary, 2nd Ed, 'service is the term for the delivery of a summons, writ or subpoena to the opposing party in a law suit.' This second claim via email is itself a false statement as:

I indicated I believed that service was improper  
is significantly different from his original claim that his:  
office has no record of having been served in this case

### **TDRPC Rule 4.01 Truthfulness Violated**

#### **Mr. Padis Lied to Delay Almost 60 Days**

It is clear that Mr. Padis lied in his original email in order to get a delay of almost 60 days and then lied in later emails to avoid sanctions for his original false statements.

Such lies are not permitted by Texas attorneys as stated in [Texas Disciplinary Rules of Professional Conduct](#), [TDRPC 4.01](#) which states:

Rule 4.01. Truthfulness in Statements to Others

In the course of representing a client a lawyer shall not knowingly:

(a) make a false statement of material fact or law to a third person;

The false statements made in those government emails are sanctionable in accordance with [TDRPC 4.01](#) as well as being federal crimes under [18 USC § 1001](#).

### **Logical Fallacies Are Intrinsicly False**

Mr. Padis admitted in later emails that his logical fallacy was intrinsicly false

satisfying requirement (a) above as the date of service / notice is a critical date for when the court has personal jurisdiction in a matter, i.e. the false statement was material. However the question of ‘knowingly’ remains.

### **Mistakes Should Be Corrected As Soon As Possible**

#### *Failure to Correct a False Statement Indicates Intention / Knowingly*

However, in the ensuing emails where I suggested places that Mr. Padis could look for records of service (and the physical copies of the summons and complaint which were already in the USATXN office), Mr. Padis did not promptly state ‘Oh, I actually meant that I had two physical copies of the complaint and summons and was trying to determine if the service was improper’. Instead Mr. Padis continued the ruse and asked probing questions about the actual service. His logical fallacy was not a mistake which was corrected as soon as possible but instead a critical part of his scheme to get a delay of almost 60 days while my wife’s dire circumstances continued. The false statement was highly material.

### **MTD [ECF15](#) Violated [TDRPC 3.01](#) Requiring Meritorious Claims**

Mr. Padis' MTD on 8 Mar 2024, [ECF15](#), had numerous false and misleading statements violating [FRCP Rule 11](#) as well as [TDRPC 4.01](#) Truthfulness and [TDRPC 3.01](#) requirements for meritorious claims.

**[TDRPC 3.01](#) Requires That Every Claim By Attorney Be Meritorious**  
[TDRPC 3.01](#) states:

#### **Rule 3.01. Meritorious Claims and Contentions**

A lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless the lawyer reasonably believes that there is a basis for doing so that is not frivolous...

### **Previous Motions For Sanctions Covered Refutation of MTD in Detail**

There were two Motions For Sanctions which discussed Mr. Padis lying in government emails and which refuted the defective MTD in full detail in [ECF30](#) and [ECF79](#). They demonstrate that there were no valid challenges to our Complaint though [ECF79](#) which was brought under [FRCP Rule 11\(c\)\(2\)](#) and has a more complete and thorough refutation.

### **Padis Claims Frivolous Allegations, Cites Allegations Not In Complaint**

#### **Entire Argument Reduced to Eight Words (Which Are False)**

In MTD [ECF15](#) Argument E titled 'The allegations in the complaint appear frivolous', Mr. Padis sought to have the entire complaint dismissed because the underlying allegations were frivolous but then only describes allegations which are not present in the actual complaint. When you take out the extraneous and misleading material, the argument only refers to allegations which:

**infer conspiracy and false documents from administrative delays**

and there are no such allegations in the complaint.

#### **The First Half of The Argument Only Cites Not Precedent Case**

The first half of the argument is just quotes from [Starrett v. Lockheed Martin Corp. et al., 735 F. Appx 169, 170 \(5th Cir. 2018\)](#), which is a not precedent decision. Quoting from a case which the 5th Circuit Court has formally declared as 'Not Precedent' without expressly identifying the case as 'Not Precedent' is at best misleading as the court might rely on the case as precedent which it is not. On appeal the 5th Circuit will simply reject any arguments based on [Starrett](#) as it has been clearly identified as 'Not Precedent'. Any argument which relies on [Starrett](#) is clearly not meritorious.

However, [Starrett](#) notes that the standard for frivolous allegations which are 'patently frivolous' is 'fanciful, fantastic, or delusional' allegations. Needless to say there are no such allegations in the complaint.

### **The Second Half of Argument Simply Mixes Up Relief and Allegations**

The second half of this argument simply mixed up unimportant allegations which were included to provide context with unrelated reliefs. Of course you can make any serious and well stated claim sound 'frivolous' by randomly choosing words and phrases and mixing them up until they are suitable nonsense. However, [Starrett](#) only concerns allegations which are on their face frivolous and not the relationship of the allegations to the relief.

Indeed, the actual allegations listed as a predicate for the unrelated relief mentioned are quite mundane and do not even approach the 'patently frivolous' 'fanciful, fantastic, or delusional' standard set in the not precedent [Starrett](#).

### **No Allegations In The Complaint Are Described By the Eight Words**

**Allegations 'infer conspiracy and false documents from administrative delays'**

The remainder of this entire argument was simply eight words describing allegations which '**infer conspiracy and false documents from administrative delays**'. If such allegations were to be in the complaint, they might be unfounded and rejected by the court but they certainly would not rise to the level of [Starrett](#) to be called 'patently frivolous', 'fanciful, fantastic, or delusional.' However, there are no such allegations in the complaint.

*Padis Admits No Infer False Documents From Administrative Delays*

AUSA Padis admitted in later phone conversations that while there are numerous



allegations of false documents in the complaint, none are based on administrative delays (ECF79).

*USATXN Falsely Claims Infer Conspiracy From Administrative Delays*

Further, a text search of the Complaint ECF29 demonstrates that the word conspiracy never occurs in the complaint nor do any of the related words which contain the string 'conspir' (as confirmed by Mr. Padis in the same phone conversation).

Mr. Padis then tried to justify the 'frivolous' argument from just the remaining 'infer conspiracy ... from administrative delays' with another false statement.

**Conspiracy and 'Whistleblower' Retaliation Are Not Synonyms**

In USATXN's response (ECF35) of 28 May 2024 attempts to justify the use of 'conspiracy' with quotes from the Complaint ECF29 about:

'whistleblower' retaliation for [Mr. Carr's] previous reports of federal crime and malfeasance by USCIS

However, conspiracy is substantially different from 'whistleblower' retaliation. Conspiracy implies multiple parties taking improper or illegal actions in secret. 'whistleblower' retaliation implies an authority figure using their authority over another person to improperly or illegally punish / retaliate the person for reporting problems outside the organization.

Given that the entire argument is now reduced to five words, why couldn't Mr. Padis have used the accurate phrase 'whistleblower' retaliation rather than the false use of 'conspiracy'.

There is also problem that in the actual Complaint (ECF29) I simply state in the DHS OIG section that I complained to DHS OIG of additional federal crimes and malfeasance by USCIS which appeared to be 'whistleblower' retaliation for my previous reports to DHS OIG, the USCIS Director and Congress of such problems.

When 'whistleblower' retaliation is reported, the only elements which are normally provided are prior reports of problems being followed by improper apparent punishment. The court was not asked to determine if there was actual 'whistleblower' retaliation but rather whether DHS OIG received any such report and whether it responded appropriately which are the actual allegations.

**There Was No N-400 Delay Related to 'Whistleblower' Retaliation**

In ECF35 USATXN falsely attempts to justify 'infer conspiracy... from administrative delays' by citing ECF29 and claiming that 'Plaintiffs allege Mrs. Carr's N-400 interview was delayed' when in fact there is no such allegation in the complaint. There are references that the N-400 was scheduled earlier than expected from published guidelines, but none about any delays scheduling the interview.

The foundation of the 'whistleblower' retaliation complaint to DHS OIG was instead the falsified documents filed by USCIS more than six months after they approved by wife's citizenship (ECF10-5) first saying that the prior interview was canceled in ECF49-5 (an obvious false statement as everyone knew that it had been completed) and then scheduling a sham interview at a date when USCIS knew my wife would be out of the country and rejecting all requests to reschedule so that they could then deny her application for 'failure to appear' (ECF10-10).

### **Entire Frivolous Allegations Argument is Meritless**

After quoting from a not precedent case, [Starrett](#), Mr. Padis used only eight words to describe allegations before continuing with unrelated garbled allegations and relief. Even so, the eight words do not describe any allegations in the complaint but instead are false statements by Mr. Padis. Mr. Padis claimed the entire case should be dismissed because of allegations which are not actually in the Complaint.

### **Conclusion**

The CDC office is asked to consider the violations of Padis in and impose sanctions appropriate for the violations of the [TDRPC](#) and the damages which resulted. Suspension could be considered for a period similar to the period where my wife was denied citizenship, her sister was denied social security benefits, and her sons were denied the opportunity to seek better employment opportunities through immediate family member immigration.

Of course the sanctions should be primarily focused on deterrence rather than punishment and it is likely that any substantive suspension will have far reaching results with DoJ attorneys in Texas giving some thought and consideration before falsifying documents or motion papers and pleadings.

The CDC Office is also asked to provide such other and further relief as it deems appropriate.

Respectfully submitted,

### **Verification of Complaint**

I, Brian Carr, the undersigned Complainant, hereby affirm under penalty of perjury in both the United States and Thailand that:

1. I have reviewed the above Complaint and believe all of the statements to be true to the best of my knowledge.
2. I have reviewed the associated documents and exhibits and believe them to be true and accurate copies with the exception of the documents identified as being redacted. The redacted documents have only been altered in accordance with normal redaction procedures to remove sensitive personal information or other sensitive information as identified in the redaction.

I hereby reaffirm that the above is true to the best of my knowledge under penalty of perjury in both the United States and Thailand.

*/s Brian P. Carr*

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Brian P. Carr  
1201 Brady Dr  
Irving, TX 75061

Date: 8. Feb. 2026

Location: Irving, Texas

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