

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

Brian P. Carr Complainant versus Tami C. Parker Bar Card Number: 24003946 Subject of the Complaint	Ethics Violations In United States District Court Northern District Of Texas (TXND) Civil No. 3-23CV2875 - S
---	---

Complaint Against Tami C. Parker, 24003946

Table of Contents

Complaint Against Tami C. Parker, 24003946.....	1
Table of Contents.....	1
Introduction.....	2
Complaint Against Tami C. Parker.....	2
Entire Record Available on The Internet.....	2
Previous Submission Classified as Inquiry, No Ethics Violations Identified.....	3
Standard For Office Review and Investigation Not Applied.....	3
TxCDC May Have Violated TDRPC 4.01.....	4
TxCDC Falsely Claimed No Violations Alleged.....	4
AUSA Parker Violated TDRPC 4.01 By Lying in Motion Papers.....	5
AUSA Parker Lies in Response Supporting FCR ECF61 of 27 Feb 2025.....	5
Falsely Claims Inadvertence for No Response and Violating LR 7.1(a).....	5
Apparent Scheme to Illegally Hinder the Service of Motion for Sanctions.....	6
Falsely Claims Papers Were Improperly 'Forwarded' to Her.....	6
Inverting the Order Of Events in Email Thread is Also False.....	7
TDRPC Rule 4.01 Truthfulness Violated.....	8
AUSA Parker Lied In Email As Part of Scheme.....	8
Conclusion.....	8
Verification of Complaint.....	9
Alphabetical Index.....	10

Introduction

Complaint Against Tami C. Parker

This is a complaint against an attorney, Tami C. Parker, who is a member of the Texas Bar Association with bar card number 24003946 and her misconduct in a case before the United States District Court, Northern District Of Texas (TXND), 3:23-cv-02875-S. AUSA Parker made demonstrably false statements in government emails (a federal crime under [18 USC § 1001](#)) as well in court filings violating [FRCP Rule 11](#). Of course these false statements are also violations of [Texas Disciplinary Rules of Professional Conduct](#), [TDRPC 4.01](#)

AUSA Parker became the lead counsel for the Department of Justice (DoJ) and all defendants (government agencies) on 13 Jun 2025 in [ECF72](#) replacing AUSA Owen who had replaced Mr. Padis. It appears that in this same time frame she also replaced Mr. Padis as Deputy Civil Chief in the Dallas Office Civil Division. 3:23-cv-02875-S is a suit against 9 government agencies alleging criminal violations of [18 USC § 1001](#) by four agencies as well as violations of individual constitutional rights through the deprivation of due process.

Entire Record Available on The Internet

There is a web page at:

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 original four general complaints submitted to the Texas Bar Association as well as this document itself ([CDCPrV](#)). There was a previous complaint against AUSA Parker filed with TxCDC as [ParkerComplaint](#) 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 AUSA Parker to myself and in court filings, the previous complaint was rejected in the TxCDC response ([CDCR1Pr](#)) of 27 Jan 2026¹ where it was claimed that the reviewer was unable to identify any violations of the [Texas Disciplinary Rules of Professional Conduct \(TDRPC\)](#) and so the previous complaint was treated as an inquiry permitting submission of a revised complaint within 20 days. This was an error of the part of TxCDC which will be discussed later.

Standard For Office Review and Investigation Not Applied

In the response for the previous complaint ([CDCR1Pr](#)), TxCDC stated:

When a grievance is received, this office conducts an initial review to determine whether the alleged conduct would be a violation of the ethics rules. If the conduct does not allege a violation, the grievance is classified as an Inquiry and dismissed with a right to appeal the dismissal. If the conduct alleges a violation, the grievance is classified as a Complaint and investigated. We have concluded that the conduct you described is not a violation of the disciplinary rules. Thus, your grievance has been classified as an Inquiry and dismissed.

It appears that the above standard for the TxCDC office initial review was not followed and that review was not thorough or complete. In particular there were

¹ This response was sent via U.S. mail with a watermark Confidential cover sheet. The TxCDC is required to keep all of its communications for preliminary matters confidential in accordance with the [Texas Rules of Disciplinary Procedure \(TRDP\)](#). However, it appears that this confidential requirement is not binding on the recipients who can release the information at their discretion.

specific affirmed statements supporting all the elements of clear violations of the [Texas Disciplinary Rules of Professional Conduct, TDRPC 4.01](#) as listed in the Table of Contents and Index of [ParkerComplaint](#).

TxCDC May Have Violated [TDRPC 4.01](#)

TxCDC Falsely Claimed No Violations Alleged

Even a cursory review of the previous complaint [ParkerComplaint](#) will reveal multiple complaints of clear and specific violations of [TDRPC 4.01](#) truthful requirements as well as referencing that specific rule. Further, there are affirmed statements supporting every element of the violations (lying) with intent being the most challenging. Any one of those clear and specific complaints should be sufficient to warrant classifying the submission as a Complaint and proceeding with the adjudication process with a potential hearing before a District Grievance Committee.

Of course the reviewer, apparently Amanda Breanne Smith in this case, could plausibly claim that it was a mistake and she did not notice any of the complaints of false statements or violations of [TDRPC 4.01](#). In that case, this submission ([CDCR1Pr](#)) should be viewed as a request for reconsideration (rather than an Amended Complaint) and both this request ([CDCR1Pr](#)) and the original complaint ([ParkerComplaint](#)) should be forwarded to the Respondent (AUSA Parker) for further adjudication.

However, if the reviewer persists in the claim that there are no affirmed statements supporting the violations of the truthfulness requirements of [TDRPC 4.01](#) then there will likely be an additional complaint against the reviewer for violations of [TDRPC 4.01](#) as well as [Texas Penal Code Chapter 37 \(Perjury and Other](#)

[Falsification](#)).

AUSA Parker Violated [TDRPC 4.01](#) By Lying in Motion Papers

AUSA Parker Lies in Response Supporting FCR [ECF61](#) of 27 Feb 2025

AUSA Parker made numerous false and misleading statements in her response [ECF74](#) on 14 Jul 2025 opposing my [FRCP Rule 60](#) Motion for Sanctions [ECF73](#) of 21 Jun 20 to Recuse and Rescind Order [ECF63](#) of 21 Mar 2025. Many of these false and misleading statements were simply quotes from the FCR [ECF61](#) of 27 Feb 2025. My Reply [ECF75](#) of 28 Jul 2025 as well as the later Motion for Sanctions [ECF87](#) of 29 Oct 2025 describes these violations in detail. However, for the sake of brevity I will focus on only one obviously false statement of particular importance which is a violation of [TDRPC 4.01](#) as well as [FRCP Rule 11](#).

Falsely Claims Inadvertence for No Response and Violating [LR 7.1\(a\)](#)

In [ECF74](#) AUSA Parker states she:

inadvertently failed to respond to that email

and then goes on imply that I had violated Local Rule [LR 7.1\(a\)](#) and Certificate of Conference requirements by not conferring with her about the specific motion.

However, a review of the emails demonstrate that by not responding to the email AUSA Parker was accepting the completed conferences of her predecessor where AUSA Owen stated in [ECF75-1](#):

I am not filing any response unless otherwise requested/ordered by the Court and it was AUSA Parker who was violating Local Rule [LR 7.1\(a\)](#) by not altering the conference results of her predecessor.

In particular the use of 'inadvertently' is clearly false as she made countless

decisions to not respond even seconds before she typed 'inadvertently failed to respond'. She later explained in [ECF87](#) that she 'forgot about the email' but did not explain:

- why she did not answer immediately,
- when she intended to respond,
- what measures she took to insure she made a response, and
- why she did not respond on each occasion when she remembered the email and the need to respond (specifically before typing inadvertently).

Also, as it appears AUSA Parker was AUSA Owen's supervisor, it is expected that she knew very well why AUSA Owen had refused to file any response supporting the flawed FCR [ECF61](#) of 27 Feb 25. The larger question is whether AUSA Parker had fired AUSA Owen for refusing to support the FCR and whether she was trying conceal the circumstances of the firing (with likely illegal orders).

This is a superficial analysis of only one false statement in Response [ECF74](#) but a review of [ECF75](#), [ECF83](#), and [ECF90](#) demonstrates numerous such false and misleading statements with the 'inadvertently' the more obvious and significant.

Apparent Scheme to Illegally Hinder the Service of Motion for Sanctions

Falsely Claims Papers Were Improperly 'Forwarded' to Her

In the Motion for Sanctions [ECF83](#) of 8 Oct 2025 against AUSA Parker there is a detailed description of how she made false claims in government emails violating [TDRPC 4.01](#) as well as [18 USC § 1001](#) in an apparent scheme to claim lack of timely preliminary service of Mr. Padis' Motion For Sanctions [ECF79](#) under [FRCP Rule 11\(c\)\(2\)](#) and [FRCP Rule 5](#). In particular, AUSA Parker stated that she intended to retain the motion papers indefinitely as:

anything that you forward to me

while in fact the papers were clearly addressed and mailed to Mr. Padis and it was a crime to retain such papers violating [18 USC § 1702](#) and, potentially, [18 USC § 1709](#). The scheme itself relied on other likely violations of [18 USC § 1001](#) by concealing the fact that Mr. Padis had requested that she retain the papers (implicitly accepting service as he already electronic copies of the motion papers) so that the U.S. mail criminal violations were not prosecutable, but relying on AUSA Parker to conceal material facts (another [18 USC § 1001](#) violation).

Inverting the Order Of Events in Email Thread is Also False

In trying to defend AUSA Parker's conduct in this matter in [ECF87](#) on 29 Oct 2025 summarized the email interchange with:

Padis informed Plaintiff that he had received a copy of his motion and would not argue to the contrary. (Doc. 83-1 at PageID 2339.) Counsel for Defendant **then** explained to Carr that she would take no further action.²

The problem is that AUSA Parker has inverted the order of events with the actual order of events as:

- Counsel for Defendant explained to Carr that she would take no further action.
- I explained to Mr. Padis and AUSA Parker that it was a crime to retain mail addressed to another person
- Padis informed Plaintiff that he had received a copy of his motion and would not argue to the contrary

The highlighted '**then**' in AUSA Parker's statement is false. The timeline of these email exchanges are complex but are described in depth in my Reply [ECF90](#) of 10 Nov 2025.

² Bold added by Plaintiffs.

TDRPC Rule 4.01 Truthfulness Violated

AUSA Parker Lied In Email As Part of Scheme

It is clear that AUSA Parker lied in her email saying I forwarded the mail to her when in fact I mailed the motion papers to Mr. Padis at his last known address which was with USATXN. It is likely that the mail room forwarded the mail to her, but that does not relieve her of her responsibility to return the mail to the United States Postal Service (USPS) when she recognized that mail was not addressed to her or to Mr. Padis in his professional role as an AUSA.

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](#).

Conclusion

The CDC office is asked to consider the violations of AUSA Parker 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 (green cards).

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 and potentially the District Grievance Committee are also asked to provide such other and further relief as they deem 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

Brian P. Carr
1201 Brady Dr
Irving, TX 75061

Date: 13. Feb. 2026
Location: Irving, Texas

Alphabetical Index

18 USC § 1001.....	2, 6 ff.
18 USC § 1702.....	7
18 USC § 1709.....	7
CDCPrV.....	2
CDCR1Pr.....	3 f.
ECF61.....	5 f.
ECF63.....	5
ECF72.....	2
ECF73.....	5
ECF74.....	5 f.
ECF75.....	5 f.
ECF75-1.....	5
ECF79.....	6
ECF83.....	6
ECF87.....	5 ff.
ECF90.....	6 f.
FRCP Rule 11.....	2, 5 f.
FRCP Rule 5.....	6
FRCP Rule 60.....	5
LR 7.1.....	5
ParkerComplaint.....	2, 4
TDRPC.....	3, 8
TDRPC 4.01.....	2, 4 ff., 8
Texas Disciplinary Rules of Professional Conduct.....	2 ff., 8
Texas Penal Code Chapter 37 (Perjury and Other Falsification).....	4
Texas Rules of Disciplinary Procedure.....	3
TRDP.....	3