

		CAUSE NO. 25-07-10523
AMANDA GRAY AND MATTHEW	§	457 th JUDICIAL DISTRICT COURT
GRAY, INDIVIDUALLY, AND AS	§	
NEXT FRIEND OF B.J.G., A MINOR	§	
v.	§	
JESSICA SISNEY AND RICHARD	§	
SISNEY, INDIVIDUALLY, AND	§	
AS NEXT FRIEND OF J.S., A MINOR	§	MONTGOMERY COUNTY, TEXAS

MOTION FOR SANCTIONS

TO THE HONORABLE VINCENZO J. SANTINI:

Amanda Gray and Matthew Gray file this Motion for Sanctions because at noon on Friday, September 4, 2026, before the Labor Day Weekend, Michelle Acosta and her clients caused to be released a video by Wayne Dolcefino in an attempt to try this case in the press, and in support of the relief they request, show:

1. **The Court of Public Manipulation:** Wayne Dolcefino is a pay-to-play political operative whose weapon of choice is the proverbial hit piece. On March 23, 2026, the Houston Chronicle characterized Wayne Dolcefino as a “political operative”:

Wayne Dolcefino is not elected, not a billionaire, not a developer. But he can tilt elections...

And, defendants hope, trials.

2. **Thou Shalt Not Use Hit Pieces To Prejudice A Trial:** Michelle Acosta has now wielded her weapon of choice, Wayne Dolcefino’s pay-to-play hit piece, in clear violation of Texas Disciplinary Rule of Professional Conduct 3.07:

(a) **In the course of representing a client, a lawyer shall not make an extrajudicial statement that a reasonable person would expect to be disseminated by means of public communication if the lawyer knows or reasonably should know that it will have a substantial likelihood of materially**

prejudicing an adjudicatory proceeding. A lawyer shall not counsel or assist another person to make such a statement.

(b) **A lawyer ordinarily will violate paragraph (a), and the likelihood of a violation increases if the adjudication is ongoing or imminent, by making an extrajudicial statement of the type referred to in that paragraph when the statement refers to:**

(1) **the character, credibility, reputation or criminal record of a party...**

(5) **information the lawyer knows or reasonably should know is likely to be inadmissible as evidence in a trial and would if disclosed create a substantial risk of prejudicing an impartial trial.**

TEX. DISCIPL. R. OF PROFESSIONAL CONDUCT 3.07. Rule 3.07 prohibits Michelle Acosta's use of Dolcefino's pay-to-play hit piece for one simple reason – it violates due process:

Paragraph (a) is premised on the idea that preserving the right to a fair trial necessarily entails some curtailment of the information that may be disseminated about a party prior to trial. This is particularly so where trial by jury or lay judge is involved. If there were no such limits, the results would be the practical nullification of the protective effect of the rules of forensic decorum and the exclusionary rules of evidence. Thus, paragraph (a) provides that in the course of representing a client, a lawyer's right to free speech is subordinate to the constitutional requirements of a fair trial....Because no body of rules can simultaneously satisfy all interests of fair trial and all those of free expression, some balancing of those interests is required. It is difficult to strike that balance. The formula embodied in this Rule, prohibiting those extrajudicial statements that the lawyer knows or reasonably should know have a reasonable likelihood of materially prejudicing an adjudicatory proceeding, is intended to incorporate the degree of concern for the first amendment rights of lawyers, listeners, and the media necessary to pass constitutional muster. The obligations imposed upon a lawyer by this Rule are subordinate to those rights. **If a particular statement would be inappropriate for a lawyer to make, however, the lawyer is as readily subject to discipline for counseling or**

assisting another person to make it as he or she would be for doing so directly....Although they are not standards of discipline, paragraphs (b) and (c) seek to give some guidance concerning what types of statements are or are not apt to violate paragraph (a). Paragraph (b) sets forth conditions under which statements of the types listed in subparagraphs (b)(1) through (5) would likely violate paragraph (a) in the absence of exceptional extenuating circumstances....Neither paragraph (b) nor paragraph (c) is an exhaustive listing.

Id. at Cmts 1, 2, and 4. Period. “[T]he practical nullification of the protective effect of the rules of forensic decorum and the exclusionary rules of evidence” was exactly Michelle Acosta’s and Jessica Sisney’s point with their bought-and-paid-for “expose” from just last Friday. Their video interview distributed broadly by Dolcefino checks all of the boxes:

	Rule 3.07 Language	The Violation
	(a) “In the course of representing a client, a lawyer shall not make an extrajudicial statement that a reasonable person would expect to be disseminated by means of public communication...”	The initial quote from the Houston Chronicle makes it quite clear that Michelle Acosta’s – and her client’s – extrajudicial statements about this case would cause anyone and everyone to expect those comments to be disseminated by means of public communication <i>because that is the point!</i> As Dolcefino says himself, “Dolcefino Media is an investigative media firm, hired by companies, law firms, private citizens and taxpayers...” (https://dolcefino.com/about-dolcefino-media/). Michelle Acosta and Jessica Sisney were interviewed on camera about this case – both its “facts” and its procedural posture. Not only did they <i>expect</i> public dissemination – they <i>sought</i> public dissemination.

	Rule 3.07 Language	The Violation
	“...if the lawyer knows or reasonably should know that it will have a substantial likelihood of materially prejudicing an adjudicatory proceeding.”	Again, Dolcefino makes this point clear: The firm has exposed government corruption, courthouse conflicts, unscrupulous attorneys and consumer fraud. Our Family Injustice investigation has exposed the horrors of the family court system across the country. Our relationships with the local and national media provide us the credibility to prepare for and respond to news coverage – even before it happens. We are committed to creating our own content on our growing platforms to further the company’s mission of truth.” <i>Id.</i> In other words, the only reason to hire the hit-piece-architect is <i>in order to materially prejudice the trial by reaching a vast audience which would include Montgomery County jurors.</i> And it bears mentioning that neither of the interviewees provided a true picture of the procedural posture of this case. Dolcefino suggests something nefarious is afoot with this case pending in Montgomery County because the incident occurred in Harris County. But under Texas law venue is proper in Montgomery County because the defendants reside here. Recognizing that truth, Michelle Acosta did not file a motion to <i>transfer</i> venue, but something virtually unheard of – a motion to <i>change</i> venue. But to hear Dolcefino tell it, the case remains here due to corruption, when, in fact, the law dictates plaintiff chooses venue so long as the venue is proper – and Montgomery County is. Did Michelle Acosta correct him on that point? She did not and, realistically, she was the source of the misinformation Dolcefino spouted. Nor did Dolcefino speak truth in his hallway attempted interview with J. Randal Bays. Mr. Bays was not even looking at him with the “death stare” comment – Dolcefino is short and Mr. Bays was urging his clients to walk around Dolcefino so they could leave. Dolcefino sat through that entire 2 + hour hearing with Judge Santini presiding, <i>and Mr. Bays lost</i>. That didn’t fit the playbook, so Dolcefino fails to mention it. The agenda is to create bias with half-truths and dramatic flair – speaking the whole truth of Judge Santini ruling against Mr. Bays’ client does not serve the mission so it didn’t make the cut.

	Rule 3.07 Language	The Violation
	“A lawyer shall not counsel or assist another person to make such a statement.”	And there’s Michelle Acosta sitting right next to her client, both being interviewed about the case, the judge, the opposing counsel, the presiding judge, and even the judge across the hall. The video shows that she counseled Jessica Sisney to make such a statement, she assisted Jessica Sisney in making such a statement, and, in fact, she <i>joined</i> Jessica Sisney in making such a statement. Per the comments, “If a particular statement would be inappropriate for a lawyer to make, however, the lawyer is as readily subject to discipline for counseling or assisting another person to make it as he or she would be for doing so directly.” The interview contained nothing but comments that were inappropriate to make, and Michelle Acosta not only made those comments herself but she also counseled and assisted both her client and Wayne Dolcefino to do so.
	(b) “A lawyer ordinarily will violate paragraph (a), and the likelihood of a violation increases if the adjudication is ongoing or imminent...”	A broadcast on all social media platforms a mere 5 days before the pretrial and 9 days before trial very clearly shows an “adjudication” which is both “ongoing or imminent”.

	Rule 3.07 Language	The Violation
	“...by making an extrajudicial statement of the type referred to in that paragraph when the statement refers to: (1) the character, credibility, reputation or criminal record of a party...”	The video touches all of the above as to <i>five</i> separate people: Matt Gray: Character, Credibility, Criminal record (throwing up three references to criminal cases – one of which was expunged as Dolcefino actually acknowledges) Judge Santini: Character, Credibility, Reputation Judge Trapp: Character, Credibility, Reputation (especially throwing some shade related to permitting a judge whose rulings are, per non-attorney Dolcefino, “illegal”). J. Randal Bays: Character, Credibility, Reputation (even hinting that the videos don’t end with this one when Dolcefino teases about other attorneys complaining about Mr. Bays and when Michelle Acosta and Jessica Sisney fan the flames of Facebook comments – see Exhibit A, attached, which will be used and authenticated at the pretrial conference). Judge Kristin Bays: Character (though, admittedly, it’s pretty complimentary because she does have a Standing Order to ensure her fairness in not hearing any cases involving her husband or any members of his firm. Nonetheless, Dolcefino cites as proof of something nefarious that her husband is her campaign treasurer (okay...) and her courtroom is right across the hall from Judge Santini (again, okay...).
	“...information the lawyer knows or reasonably should know is likely to be inadmissible as evidence in a trial and would if disclosed create a substantial risk of prejudicing an impartial trial.”	Is there any reason to tie this bit to the video or is it just too obvious? * Expunged criminal prosecutions are never going to be admissible and are also a violation of this Court’s Standing Order <i>In Limine</i>. * Criminal prosecutions unrelated to anything in this case are not only inadmissible, but are also a violation of this Court’s Standing Order <i>In Limine</i>. * The comments of the officers are both based upon hearsay and are speculation – not one but two reasons that are inadmissible.

Given the salacious nature of their interview, it not only “create[d] a substantial risk of prejudicing an impartial trial”, but it was also *designed* to prejudice an impartial

trial. That was the very *purpose* of this interview, as Dolcefino advertises on his website. This video was posted on Dolcefino’s website, YouTube channel, and Facebook to achieve maximum coverage after he posted a teaser trailer on the same spots just days before the Friday launch. He click-baited viewers on the eve of trial in order to get the bought-and-paid-for result for his customer. While pay-to-play hit pieces are how Dolcefino makes his living, that does not shield Michelle Acosta utilizing Dolcefino’s services in order to undermine due process.

3. **Desperate Times, Desperate Measures:** The fact that Michelle Acosta has lost in Court before two different judges on the same arguments made in her hired gun video is highly troubling. In the video, Michelle Acosta literally says, “I’m an idealist. I believe in our justice system.” First, that is not being an idealist – that is being an attorney. Second, Michelle Acosta’s actions speak louder than her words and are not very attorney-like at all.

a. **Strike 1:** Ms. Acosta came out of the gate guns ablazin’ with her Motion to *Change Venue* (which she filed for 3 days consecutively, no one knows why) related to her notion, *sans* evidence, that her clients – ***who live in Montgomery County*** – cannot get a fair trial here. As she says (in her not-so-succinct AI manner):

1.29 The prejudice in Montgomery County against Defendants is substantial and insurmountable:

- 1) Commissioner Matthew Gray is an elected official serving as Montgomery County Commissioner for Precinct 4, giving him significant political influence and connections throughout Montgomery County;
- 2) As a member of the Commissioners Court,

Commissioner Matthew Gray exercises budgetary authority over county departments and has substantial influence over county operations and personnel, including those who work in the courthouse where this case would be tried;

3) Commissioner Matthew Gray's position as County Commissioner creates inherent conflicts of interest when Montgomery County courts, funded and overseen by the Commissioners Court, are asked to adjudicate claims against him;

4) The local prejudice is exacerbated by Commissioner Matthew Gray's status as a public official who voters in Montgomery County elected to represent their interests, creating a natural bias in favor of protecting their elected representative;

5) Potential jurors in Montgomery County may be reluctant to render a verdict against their elected County Commissioner, particularly one involving substantial monetary damages and claims of misconduct; and

6) The interconnected nature of Montgomery County government, where Commissioner Matthew Gray serves in a leadership capacity, creates an atmosphere where an impartial trial cannot be had;

7) Documented Financial Control: Montgomery County Commissioner's Court Minutes provide concrete evidence of Commissioner Matthew Gray's direct participation in budget decisions affecting judicial operations, including the Fiscal Year 2026 Budget approval involving over \$1.1 million in allocations impacting court functions;

8) Personnel Authority Over Court Support: Commissioner Matthew Gray exercises decision-making authority over constables and other law enforcement personnel who directly support court operations through serving legal processes and providing courthouse security;

9) Administrative Integration: The minutes document Commissioner Matthew Gray's involvement in court administrative functions, including judicial appointments and operational oversight that creates financial and

administrative dependency of the court system on his decisions;

10) Collaborative Decision-Making Pattern: Official records show a pattern of collaborative motions and joint decision-making between Commissioner Matthew Gray and judicial officials, demonstrating ongoing working relationships that compromise judicial independence; and

11) Systemic Conflict of Interest: The comprehensive evidence shows that the Montgomery County judicial system operates under the direct financial and administrative control of Commissioner Matthew Gray, making impartial adjudication of claims against him structurally impossible.

12) Code-Mandated Disqualification of Alternative Venues: Under Canons 2A and 2B of the Texas Code of Judicial Conduct, Judge Kristin Bays of the 284th District Court is mandatorily disqualified from presiding over any case where her spouse J. Randal Bays represents a party. This is not a discretionary recusal but a mandatory disqualification based on the Code's prohibition against allowing relationships to influence judicial conduct and the requirement to maintain public confidence in judicial impartiality.

13) Constitutional Impossibility of Intra-County Transfer: With the 457th District Court compromised by Commissioner Gray's influence and the 284th District Court eliminated by mandatory judicial disqualification, no Montgomery County district court can provide the constitutionally required fair and impartial forum, making venue transfer to Harris County not merely appropriate but constitutionally mandated.

Items 1, 3, 4, 5, and 6 all imagine a situation where all Montgomery County jurors would feel forced to find in favor of Matt Gray. At the hearing on this argument, the Court dispensed with that concern by noting that this is a county of 800,000 people, that Michelle Acosta could question the jury panel about their supposed fealty to Matt

Gray, and that any juror who could not be fair, would be stricken – just like we do in our justice system. Ms. Acosta just doesn't understand how the justice system works, an observation made by The Honorable Reva Towslee-Corbett at the conclusion of the recusal hearing. The rest of Michelle Acosta's list confirms Judge Towslee-Corbett's observation:

- * Item 7 imagines that Matt Gray's single vote on the 5-member Commissioners Court is somehow dispositive of Montgomery County's budget;
- * Item 8 incorrectly assigns to Matt Gray some kind of "decision-making authority" over courthouse deputies;
- * Item 9 completely ignores that our government is comprised of three separate branches of government such that Matt Gray is *not* "involv[ed] in court administrative functions" including having no control over district court "judicial appointments;"
- * Item 10 speaks of a wholly fictitious "pattern of collaborative motions" with "judicial officials" (what?!); and
- * Item 11 describes Matt Gray as some kind of feudal lord over the judiciary – a branch of government in which he is not a member.

The complete and total lack of understanding about how the justice system works – including that per the Texas Constitution District Court judges oversee Commissioners Court, not the other way around – has been the hallmark of Ms. Acosta's pleadings. A byproduct of too much AI in her diet.

b. **Strike 2:** Ms. Acosta's use of AI invented a whole Motion to Recuse, filled with page after page of AI misunderstandings about how things work. Judge Towslee-Corbett heard Ms. Acosta's AI hallucinated vast and unsubstantiated conspiracy theories, received "evidence" of them, found no actual evidence supported them, and denied the Motion. The Judge of this Court and Judge Reva Towslee-

Corbett have rejected Ms. Acosta's incorrect and incoherent motions, though all were patient with her rich fantasy life. Last Friday, she decided to make it a reality by presenting them anew on social media with a soundtrack and video designed to create an illusion which evidence does not support.

c. **Strike 3:** The video hit piece on three judges, one attorney, and one litigant on the eve of trial is more than just a clear violation of Michelle Acosta's oath as an attorney (as well as the disciplinary rule which prohibits what she just did) – it is also a blatant manipulation of the court of public opinion with a paid for hit-piece designed to achieve an outcome that she cannot otherwise obtain, all done in the manner of a temper tantrum. Her conduct is sanctionable.

4. **Inherent Powers and Bad Actors:** “Sanctions are but one of a number of “tools” used by courts to enforce their orders, and, in Texas, sanctions in civil disputes arise from three sources: the Rules of Civil Procedure, the Texas Statutes, and the state and federal constitutions.” *In re A.C.J.*, 146 S.W.3d 323, 326 (Tex. App. – Beaumont 2004, no pet.). “A court has the inherent power to impose sanctions on its own motion in an appropriate case.” *In re Bennett*, 960 S.W.2d at 40. The Inherent judicial power of a court is not derived from legislative grant or specific constitutional provision, but from the very fact that the court has been created and charged by the constitution with certain duties and responsibilities. **The inherent powers of a court are those which it may call upon to aid in the exercise of its jurisdiction, in the administration of justice, and in the preservation of its independence and integrity.** Inherent power of the courts has existed since the days of the Inns of Court in common law English jurisprudence. *Nevitt v. Wilson*, 116 Tex. 29, 285 S.W. 1079, 1083 (1926); *People ex rel. Karlin v. Culkin*, 248 N.Y. 465, 162 N.E. 487 (1928). It also springs from the doctrine of separation of powers between the three governmental branches. Tex.Const. Art. II, Sec. 1. **This power exists to enable our courts to effectively perform their judicial functions and to protect their dignity, independence and integrity.**

Eichelberger v. Eichelberger, 582 S.W.2d 395, 398-99 (Tex. 1979) (emphasis added).

The Supreme Court in *Eichelberger* goes on to list dozens of cases in which courts have used this implied power. *See Id.* at 399, n.1. “[S]anctions issued pursuant to a court’s inherent powers are permissible only to the extent necessary to deter, alleviate, and counteract bad-faith abuse of the judicial process.” *Brewer v. Lennox Hearth Prods., LLC*, 601 S.W.3d 704, 708 (Tex. 2020). “[I]nvocation of the court’s inherent power to sanction necessitates a finding of bad faith.” *Id.* at 718. “[B]ad faith can exist without explicitly violating a rule, statute, or ethical code of conduct; [...] direct evidence of bad faith is not required.” *Id.* at 716. Further,

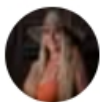
Bad faith is not just intentional conduct but intent to engage in conduct for an impermissible reason, willful noncompliance, or willful ignorance of the facts. “Bad faith” includes “conscious doing of a wrong for a dishonest, discriminatory, or malicious purpose.” Errors in judgment, lack of diligence, unreasonableness, negligence, or even gross negligence – without more – do not equate to bad faith. Improper motive, not perfection, is the touchstone. Bad faith can be established with direct or circumstantial evidence, but absent direct evidence, the record must reasonably give rise to an inference of intent or willfulness.

Brewer, 601 S.W.3d at 718-19 (see *Brewer* footnotes 50-56 on pages 718-719 for extensive string cites and further explanation of the terms in the paragraph quoted here). “[T]he severity of the sanction imposed turns on the degree of bad faith.” *Id.* at 720. In short, this Court has the power to sanction defense counsel as an inherent power:

Courts possess inherent power to discipline an attorney’s behavior. *See Lawrence v. Kohl*, 853 S.W.2d 697, 700 (Tex. App. – Houston [1st Dist.] 1993, no writ) (holding that trial courts have the power to sanction parties for bad faith abuse of the judicial process not covered by rule or statute); *Kutch v. Del Mar College*, 831 S.W.2d 506, 509-10 (Tex. App. –

Corpus Christi 1992, no writ) (same); see also *Public Util. Comm'n v. Cofer*, 754 S.W.2d 121, 124 (Tex.1988) (recognizing the inherent power of courts to ensure an adversarial proceeding); *Eichelberger v. Eichelberger*, 582 S.W.2d 395, 398-99 (Tex.1979) (recognizing that a court has inherent power “which it may call upon to aid in the exercise of its jurisdiction, ***in the administration of justice, and in the preservation of its independence and integrity***”). A court has the inherent power to impose sanctions on its own motion in an appropriate case.

In re Bennett, 960 S.W.2d 35, 40 (Tex. 1997)(emphasis supplied). Michelle Acosta’s “conscious doing of a wrong for a dishonest, discriminatory, or malicious purpose” is readily apparent with the video and her comments in it. But she and her clients fanning the flames on Facebook cements the bad faith that lead to this violation of Rule 3.07. Those comments range from gushing thank you’s to Wayne Dolcefino for helping them get justice to advising the angry mob on when the trial is encouraging them to gather their pitchforks and attend. This angry mob is even making threats about doing bodily harm to Matthew Gray. Now the Constitution has an open court provision, and, truth is, those folks can come and observe how there is no corruption occurring, but that isn’t what they are rallying the crowd to believe. They are, literally and maliciously, throwing gas on the fire as seen in Jessica Sisney’s comment made on the same day the video dropped which hints that there is more to come:



Jessica Pitts Sisney · 3d · by author

Wayne, saying thank you will never be enough. You and your team are truly courageous and fiercely dedicated to exposing the truth and standing up for what is right when it would otherwise be ignored. I know once you get started, you do not back down, and you definitely do not let bullies win. Thank you for giving us a voice and platform! I know you are just getting started 🔥



Reply



109

“[Y]ou are just getting started” with a fire emoji speaks volumes about where Jessica Sisney thinks justice reigns supreme – hit pieces. *See also* Exhibit A for more comments by defendants and Ms. Acosta, especially those encouraging people to come to trial and show their anger.

4. **The Appropriate Sanction:** The Texas Supreme Court explained:

The first prong of the *TransAmerican* [*v. Powell*, 811 S.W.2d 913 (Tex. 1991)] test concerns the relationship between the conduct evinced and the sanction imposed and requires **a direct nexus between the offensive conduct, the offender, and the sanction award**. *See id.* at 917. A just sanction must be directed **against the abusive conduct with an eye toward remedying the prejudice caused to the innocent party, and the sanction must be visited upon the true offender**. *Id.* A court must attempt to determine whether the **offensive conduct is attributable to counsel only, to the party only, or to both**. *Id.* Yet we warily noted in *TransAmerican* that apportioning blame between an attorney and a represented party “will not be an easy matter in many instances.” *Id.* Such caution is warranted. The closeness that typically defines interaction between a litigant and his attorney not only binds their interests but may lend an overall opacity to the relationship that renders it difficult to determine where a party’s input ends and where an attorney’s counsel begins.

The second prong of the due process analysis under *TransAmerican* considers **the proportionality of the punishment relative to the misconduct and warns “just sanctions must not be**

excessive.” *Id.* Not only should a punishment (*i.e.*, sanctions) fit the crime (*i.e.*, the triggering offense), the sanction imposed should be no more severe than necessary to satisfy its legitimate purposes. *Id.* **Legitimate purposes may include securing compliance with the relevant rules of civil procedure, punishing violators, and deterring other litigants from similar misconduct.** *Spohn Hosp. v. Mayer*, 104 S.W.3d 878, 882 (Tex. 2003).

We require courts to consider less stringent sanctions and weigh whether such lesser sanctions would serve to promote compliance. *TransAmerican*, 811 S.W.2d at 917. Evidencing our reticence to wield the heavy hammer of sanctions, we have cautioned: “[c]ase determinative sanctions may be imposed in the first instance only in exceptional cases when they are clearly justified and it is fully apparent that no lesser sanctions would promote compliance with the rules.” *Tanner*, 856 S.W.2d at 729.

Nath v. Texas Children’s Hosp., 446 S.W.3d 355, 363 (Tex. 2014). Using the *Transamerican* approach here:

While both the attorney and client were interviewed in the pay-to-play hit piece, and both are responsible for it, Texas Disciplinary Rule of Professional Conduct 3.07 applies to the attorney, and makes the attorney responsible for her client’s actions. The sanction should against Michelle Acosta.

The proportionality element is a big one because Michelle Acosta’s conduct was designed to ensure that Amanda Gray and Matthew Gray could not get a fair trial. Defendants have long complained that they cannot get a fair trial in Montgomery County. All of the judges who considered their complaints rejected them, but rather than appeal those rulings, defendants have opted to weaponize the court of public opinion to harm Matt Gray, Judge Santini, Judge Trapp, Judge Bays, and opposing counsel. Not. Okay.

As for the “legitimate purpose,” what the Grays suggest checks all of the boxes: it “secur[es] compliance with the relevant rules of civil procedure [namely Professional Conduct Rule 3.07], punish[es] violators, and deter[s] other litigants from similar misconduct.”

That is why the only appropriate sanction would be for Michelle Acosta to pay to ensure that the jury will be unbiased, but that is no mean feat, and for Michelle

Acosta to pay the legal fees that Amanda Gray and Matthew Gray incurred in dealing with Ms. Acosta's sanctionable conduct.

a. **Ask the Jurors Just Like The Law Typically Expects:** Unlike the defense who could ask if the jurors about bias for Matt Gray, Matt Gray can't ask jurors about the video without throwing a skunk into the venire. Jurors who have seen it will then talk about it, educating the jurors who *haven't* seen it. There is no *voir dire* cure here because the cure is worse than the disease.

b. **Changing Venue:** Well, now, that just rewards this bad behavior, and, even worse, doesn't solve the problem. As Dolcefino says, he has "relationships with the local and national media" and he "creat[es his] own content on [his] growing platforms." So where can you go when the video is on the internet via a paid-political-operative whose goal is to reach a national audience on his growing platforms?

c. **Sequestering the Jury:** This is the solution. To sequester the Jury, this County is facing the following estimated costs per day:

Hotel:	\$190/night x 14 jurors = \$2,660/day
Food:	\$75/day x 14 jurors = \$1,050/day
Security:	\$80/hour x 15 hours/day x 2 officers = \$2,400/day
	Weekends would be \$80/hour x 24 hours x 2 officers = \$3,840/day
Transport:	\$500/day
TOTAL:	\$6,610/day for weekdays and \$7,550 for weekends¹

If the trial lasts the 6 days Michelle Acosta predicts, then that is 8 calendar days – 6 weekdays and 2 weekend days – for a cost of roughly \$54,760. The County should not

¹ There is no transport expense on the weekends, but the security expense increases.

have to pick up that tab, the necessity of which was created by Michelle Acosta's misconduct. The punishment which fits the crime and solves the problem – the punishment which is the least given the gravity of the sanctionable misconduct – is to require Michelle Acosta to pay the sequestration cost as a sanction. Michelle Acosta and her clients created this mess, Michelle Acosta needs to clean it up. Michelle Acosta and her clients paid Wayne Dolcefino to create his pay-to-play hit piece. Michelle Acosta can pay to ensure that justice is done. And, indeed, this sanction has the added benefit of eliminating Dolcefino's antics when they destroy the fairness of a trial. Dolcefino's usual customers – disgruntled litigants, like the defense – can learn that hit pieces on judges, opposing counsel, and your opponent backfires, that our justice system is bigger than Wayne Dolcefino's "growing platforms", and that his business model cannot be used to manipulate our justice system with impunity.

Prayer

The Grays respectfully pray that the Court hear this Motion for Sanctions at the pre-trial conference, given the video was released 5 days before pretrial, grant the Motion for Sanctions, and grant to them any other relief to which they are entitled.

Respectfully submitted,

/s/ J. Randal Bays

J. Randal Bays

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NEXT FRIEND OF B.J.G., A MINOR

CERTIFICATE OF SERVICE

This is to certify that on September 7, 2026 the foregoing Motion for Sanctions and Order regarding same were served via e-service on the following counsel of record pursuant to Rules 21 and 21a of the Texas Rules of Civil Procedure:

Michelle T. Acosta
4601 Washington Ave., Suite 200
Houston, Texas 77007

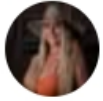
Jeffrey B. Haas
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Houston, Texas 77027

/s/ J. Randal Bays
J. Randal Bays

EXHIBIT A

The following represents a sampling of the 585 Facebook comments as of September 7, 2026

September 4, 2026:



Jessica Pitts Sisney · 3d ·  by author

Wayne, saying thank you will never be enough. You and your team are truly courageous and fiercely dedicated to exposing the truth and standing up for what is right when it would otherwise be ignored. I know once you get started, you do not back down, and you definitely do not let bullies win. Thank you for giving us a voice and platform! I know you are just getting started 🔥



Reply



109



Richard Earl · 3d

God will shine his light on the darkness soon prayer is very powerful ! My son has suffered a tremendous amount over this .



Reply



1



Summer Cannon · 3d

Oh I didn't realize you were related to the victim.

Have criminal charges been pressed? I can tell a civil suit was filed but not sure about the criminal part.



Reply



Charlotte Woods Zelie · 2d

[Richard Earl](#) prayers for your son 🙏 ...



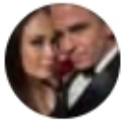
Reply

September 5-6, 2026:



Edger Torpid · 2d · by author ...
This is fucking sickening.

Reply 6



Michelle Acosta · 2d · by author ...
Trial starts 9/14

Reply 10



Deshanna Kirkland · 2d · by author ...
Wow and wow again thank you for bringing this to public view.

Reply 6



Rose Melissa Cervantes · 2d · by author ...
Hypocrisy is right ! 😮

Reply 5



Jordan Laffitte · 2d
How was he able to stop the security guard and still not be arrested? ...

Reply 32



Rebecca Liane · 2d
[Jordan Laffitte](#) because he left the scene before law enforcement could do anything.

Reply



Michelle Acosta · 1d
Both Commissioner Gray and HIS mother received citations! In the full video you see his mother push Jessica as well! You also see how his son started the entire incident by kicking and hitting Jessica's son in the face with the lily pad.

Reply 1



Mike Frost · 2d · by author

Trial starts 9/14 everyone come watch. ...



Reply



28



Charlotte Woods Zelie · 2d · by author

Mike Frost exactly



Reply



7



Elizabeth Reed · 1d

Mike Frost which courthouse...I'm sure it'll be packed so I want to get there early!!!



Reply



4



Jessica Pitts Sisney · 1d

Elizabeth Reed 457th District Court, downtown conroe. ...



Reply



1



Mike Frost · 1d

Elizabeth Reed jury selection starts 1pm - the more community support the better



Reply

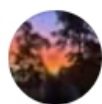


4

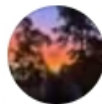


Rebecca Liane · 1d

Elizabeth Reed thank you!! We could use all the support we can get! My nephew deserves justice and deserves to know that good people who care still exist in this world! Those in power that should be helping have done nothing but try to silence them since this happened. I think if enough people were to show up in support of Jase the silence would be forced to be broken and publicly at that!

 **Manzano Lynnette** · 2d ...
ABC13 Houston
👍 🗨️ Reply 👍 4

 **Rebecca Liane** · 1d
Manzano Lynnette I wish someone would help **Wayne Dolcefino** with **Dolcefino Consulting** expose this and help their attorney get the justice deserved for my nephew and his family.
👍 🗨️ Reply

 **Manzano Lynnette** · 2d ...
FoxHouston Desk
👍 🗨️ Reply 👍 4

 **Rebecca Liane** · 1d
Manzano Lynnette I wish someone would help **Wayne Dolcefino** with **Dolcefino Consulting** expose this and help my nephew and his family and their attorney get the justice deserved.
👍 🗨️ Reply

September 6, 2026:



Michelle Acosta · 1d

Which case? I'd love to look it up ...



Reply



Kaylen Peterson · 1d

Michelle Acosta Hi. I looked it up yesterday when I saw this comment, and believe she is referring to this case. It was reversed and remanded 5 days ago. Appellate case: 09-25-00450-CV. The appellant court found that that they disposed of D&Ms case immediately before trial through an evidentiary objection even though no summary judgement motion had been filed. There was one more that same day but I can't see if Bays was the attorney for it for some reason. 09-25-00108-CV, trial case 25-03-03781-CV.



Michelle Acosta · 1d

Randy Bays was the attorney on that case. CASE NO. 23-08-11792 was the district court case number



Reply



1



Wendi Yokum Ojeda-Hunter · 1d

Kaylen Peterson That's it. I review all 9th COA, Supreme Court cases, and CCA cases every week. I was not commenting personally on this or any matter before Santini nor the veracity of the accusations.



Reply



Michelle Acosta · 1d

Voir dire (jury selection) starts at 1 PM on 9/14, followed by opening statements



Reply



2

September 7, 2026:



Revis Bell · 18h

According to state law the person filing a lawsuit against someone must file the suit in county where the person that is getting sued lives.



Reply



Michelle Acosta · 8h

That's just one of the rules that determine venue. ...



Reply