

CAUSE NO. DC-26-10367

JEREMY LIEBBE,
Plaintiff,

v.

DALLAS PRIDE,
Defendant.

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IN THE 192nd
CIVIL DISTRICT COURT
IN AND FOR
DALLAS COUNTY, TEXAS

PLAINTIFF’S ORIGINAL PETITION

TO THE HONORABLE COURT:

COMES NOW, Jeremy Liebbe who files his Original Petition complaining of Dallas Pride, and for cause of action respectfully shows the following:

I. PARTIES

1.01 Plaintiff Jeremy Liebbe (“Liebbe”) is a natural person who resides in Kaufman County, Texas.

1.02 Defendant Dallas Pride is a Texas nonprofit corporation based in Dallas County, Texas, which does not have a principal office. Dallas Pride can be served with citation via Maurice Franklin Holland aka Frank Holland, its president and registered agent, at his usual place of business at Pecker’s Bar located at 2615 Oak Lawn Avenue, Dallas, Dallas County, Texas 75219; his usual place of residence located at 4601 Sylvester Street, Dallas, Dallas County, Texas 75219; or wherever he may be found.

II. DISCOVERY

2.01 Plaintiff intends to conduct discovery under Level 2 of the Texas Rule of Civil Procedure 190.3.

2.02 Plaintiff reserves the right to move this Court to enter a discovery control plan order under Texas Rule of Civil Procedure 190.4.

2.03 Plaintiff seeks non-monetary relief (to-wit: declaratory relief and injunctive relief) and monetary relief of more than \$500.

III. JURISDICTION AND VENUE

3.01 This Court has jurisdiction over this matter under the laws and Constitution of the State of Texas because the parties are Texas entities and residents and the amount in controversy is within the jurisdictional limits of this Court.

3.02 Pursuant to TEX. CIV. PRAC. & REM. § 15.002, venue is proper in Dallas County, Texas, because a substantial part of the events or omissions giving rise to the cause of action asserted herein occurred in Dallas County, Texas, and because Defendant is based in Dallas County, Texas.

3.03 Pursuant to TEX. PROP. § 123.003, notice of the filing of this proceeding shall be given to the state attorney general's office by Plaintiff within 30 days of filing. The state attorney general's office may intervene in this proceeding for and on behalf of the interest of the general public of this state. *See* TEX. PROP. § 123.002.

IV. HISTORY

4.01 Dallas' first LGBTQ+ Pride parade was a small but festive 1972 march through downtown Dallas. The Dallas Tavern Guild aka Oaklawn Tavern Guild took responsibility for the annual pride parade in 1983. The event grew under the leadership of successive executive directors Alan Ross, Michael Doughman, and Jaron Turnbow.

4.02 The Dallas Tavern Guild aka Oaklawn Tavern Guild operated as a 501(c)(4) social welfare organization that was allowed to lobby for legislation and participate in political

campaigns; however, donations to it were not tax-deductible. To support continued growth and opportunities for the Dallas Pride parade and festival, the tavern guild's leadership elected to form a separate entity for the event and pursue 501(c)(3) designation.

V. DALLAS PRIDE

5.01 Dallas Pride is a Texas nonprofit corporation formed with a charitable and educational purpose of leading events that promote a diverse, inclusive, and positive image of the lesbian, gay, bisexual, transgender, and queer ("LGBTQ") community. Dallas Pride was organized as a nonprofit corporation pursuant to TEX. BUS. ORG. § 22.101 and received Texas Secretary of State Filing Number 803138116 on October 10, 2018. The Internal Revenue Service ("IRS") issued Dallas Pride federal tax identification number 83-2258801 and determined it to be exempt from federal income tax under 26 U.S.C. § 501(c)(3) on March 11, 2019. The Texas Comptroller of Public Accounts subsequently issued Dallas Pride state tax identification number 320686621211 and determined it to be exempt from franchise tax and sales and use tax. Dallas Pride is a charitable entity. *See* TEX. PROP. § 123.001(1).

5.02 Dallas Pride is required by law to file a periodic report to the Texas Secretary of State that lists the names and addresses of all directors and officers not less than every 4 years. *See* TEX. BUS. ORG. § 22.357. Dallas Pride filed its most recent periodic report to the Texas Secretary of State on or about August 21, 2023, listing Frank Holland, Lee Daugherty, Truett Calvert, Christine Bengston, Harvey Meissner, and Kevin Miller as its directors.

5.03 Christine Bengston resigned from Dallas Pride on November 20, 2023. Truett Calvert resigned on January 3, 2024. On information and belief, Kevin Miller resigned in May 2024. On information and belief, Harvey Meissner has also resigned.

5.04 According to Dallas Pride’s website¹, Frank Holland (legal name Maurice Franklin Holland) (“Holland”), Jessica Thompson-Castillo, Lee Daugherty, and Kevin Miller are as its directors and Sherrell Cross (“Cross”) is its executive director.

5.05 On information and belief, Maurice Franklin Holland, Sherrell Cross, Jessica Thompson-Castillo, and Lee Daugherty are the current fiduciaries of Dallas Pride. *See* TEX. PROP. § 123.001(4).

5.06 Dallas Pride, its directors, and its executive director have a fiduciary duty of care, a fiduciary duty of loyalty, and a fiduciary duty of obedience.² A Texas nonprofit corporation’s fiduciaries must act in good faith and must comply with federal law, state law, and the corporation’s governing documents.

VI. FINANCIAL MISMANAGEMENT

6.01 Dallas Pride has been embroiled in allegations of embezzlement, fraud, and financial mismanagement over the past 2 years.^{3,4,5} In August 2023, Dallas Pride discovered that it was missing over \$100,000 in donated charitable funds. Adam Lynn (“Lynn”), who served as Dallas Pride’s treasurer, immediately resigned from the board of directors. Evidence implicated Lynn and, on information and belief, Lynn confessed his embezzlement to Holland.

6.02 Plaintiff served as Dallas Pride’s director of security from October 2018 through July 2024. Plaintiff secured Dallas Pride’s financial records when Lynn refused to surrender control of Dallas Pride’s QuickBooks Online account. Plaintiff discovered and reported to the board of directors that Dallas Pride’s 2020 Form 990-N tax return filed by Lynn contained falsified

¹ <https://dallaspride.org/about/>

² <https://www.texasattorneygeneral.gov/divisions/charitable-trusts/closing-charitable-trust-or-charitable-organization>

³ <https://dallasvoice.com/dallas-pride-addresses-allegations/>

⁴ <https://dallasvoice.com/cassie-nova-the-fall-of-pride/>

⁵ <https://dallasvoice.com/statement-from-sherrell-cross-executive-director-of-dallas-pride/>

information. Plaintiff later discovered that Dallas Pride's 2021 and 2022 Form 990 tax returns filed by Holland contained falsified information. Plaintiff resigned from Dallas Pride on July 5, 2024.

VII. FAILURE TO MAINTAIN & DISCLOSE FINANCIAL RECORDS

7.01 Dallas Pride is required by federal law to file a Form 990 federal tax return on an annual basis. Form 990 tax returns are required to be made available to the public. Dallas Pride filed its 2019 Form 990 on or about April 2, 2020; its 2020 Form 990-N on an unknown date; its 2021 Form 990 on or about November 13, 2023; and its 2022 Form 990 on or about November 13, 2023. Lynn signed Dallas Pride's 2019 Form 990 and 2020 Form 990-N. Holland signed Dallas Prides 2021 and 2022 Form 990 returns as its president.

7.02 The IRS imposes a penalty of \$20 per day for each day a Form 990 return is late.⁶ Dallas Pride's 2021 return was 548 days late and its 2022 return was 183 days late. As of this filing, Dallas Pride's 2023 return is 752 days late, its 2024 return is 387 days late, and its 2025 return is 22 days late, totaling up to \$37,840 in accruing IRS penalties. Exempt organizations that fail to file returns for three consecutive tax years automatically lose their tax-exempt status.⁷

7.03 Dallas Pride is required by state law to maintain current and accurate financial records in accordance with generally accepted accounting principles and its board of directors is required by state law to annually prepare or approve a financial report for the preceding year that conforms to accounting standards and which must include specified financial information regarding revenue, changes in fund balances, expenses, and balance sheet(s). *See* TEX. BUS. ORG. § 22.352. On information and belief, Dallas Pride has failed to meet those requirements.

⁶ <https://www.irs.gov/charities-non-profits/exempt-organizations-annual-reporting-requirements-filing-procedures-late-filing-of-annual-returns>

⁷ <https://www.irs.gov/charities-non-profits/automatic-revocation-of-exemption>

7.04 Dallas Pride is required by state law to make certain records, books, and reports available to the public. *See* 26 U.S.C. § 6104 and TEX. BUS. ORG. §§ 22.353-22.354.

7.05 On June 29, 2025, Plaintiff sent an email to Cross and Holland requesting copies of, *inter alia*, records required by Texas law to be made available to the public pursuant to 26 U.S.C. § 6104 and TEX. BUS. ORG. §§ 22.353-22.354. Plaintiff received a read receipt from Cross's email account but otherwise received no response. On August 12, 2025, Plaintiff sent another request for the records via email to Cross and Holland. Plaintiff again received no response. On August 20, 2025, Plaintiff sent a third request for the records via USPS CMRR to Dallas Pride's post office box and Holland's business address. The return receipt for the letter sent to Holland's business address was received and appears to bear Holland's signature. The return receipt for the letter sent to Dallas Pride's post office box was never received. Plaintiff, once again, received no response from Dallas Pride.

7.06 A Texas nonprofit corporation commits a Class B misdemeanor offense if it (i) fails to maintain required financial record(s), (ii) fails to prepare required annual report(s), or (iii) fails to make such record(s) or report(s) available to the public. *See* TEX. BUS. ORG. § 22.354.

7.07 Dallas Pride has failed to make required records available to Plaintiff in criminal violation of TEX. BUS. ORG. § 22.354.

7.08 Dallas Pride has failed to properly maintain required financial records in criminal violation of TEX. BUS. ORG. § 22.354.

7.09 On information and belief, Dallas Pride has failed to prepare the required annual reports in criminal violation of TEX. BUS. ORG. § 22.354

7.10 Dallas Pride's directors and executive director have breached their fiduciary duties, harming its donors, its volunteers, and the LGBTQ community at large.

VIII. REQUEST FOR DECLARATORY RELIEF

8.01 Dallas Pride has, by ignoring Plaintiff's requests for information, effectively denied that it is required to disclose records under TEX. BUS. ORG. §§ 22.353-22.354. Plaintiff believes his rights are affected by those statutes and seeks to obtain a declaration of rights, status, and other legal relations as allowed by TEX. CIV. PRAC. & REM. § 37.004.

8.02 Plaintiff seeks a declaration from the Court that:

- a) Dallas Pride is a Texas nonprofit corporation organized under and subject to the statutory requirements of Chapter 22 of the Texas Business Organizations Code;
- b) Dallas Pride is a charitable entity as defined by TEX. PROP. § 123.001(1).
- c) Dallas Pride is required by state law to maintain current and accurate financial records with complete entries as to each financial transaction of the nonprofit corporation, including income and expenditures, in accordance with generally accepted accounting principles as required by TEX. BUS. ORG. § 22.352(a);
- d) Dallas Pride's directors are required by state law to annually prepare or approve a financial report for Dallas Pride for the preceding year, that the report must conform to accounting standards as adopted by the American Institute of Certified Public Accountants, and that the report must include the information specified in TEX. BUS. ORG. § 22.352(b);
- e) Dallas Pride is required by state law to make its annual financial reports and other records specified in 26 U.S.C. § 6104(d) available to the public pursuant to TEX. BUS. ORG. § 22.353;

- f) The information sought by Plaintiff is public information and not exempt from disclosure under TEX. BUS. ORG. § 22.355; and
- g) Dallas Pride committed a criminal offense by failing to provide the public information sought by Plaintiff in violation of TEX. BUS. ORG. § 22.354.

IX. REQUEST FOR INJUNCTIVE RELIEF

9.01 Plaintiff seeks a permanent injunction ordering Dallas Pride to comply with TEX. BUS. ORG. §§ 22.351-22.353 and 26 U.S.C. § 6104(d)—which is incorporated into TEX. BUS. ORG. § 22.353—as of the filing of this cause and in the future.

9.02 The repeated failures of Dallas Pride’s fiduciaries to follow federal and state law have placed the charitable nonprofit corporation’s legal existence at risk, which risks the public members of the Dallas-area LGBTQ+ community at risk of suffering harm.

9.03 Dallas Pride’s refusal to acknowledge, yet alone respond to, Plaintiff’s requests for public information has resulted in Plaintiff suffering harm.

9.04 In the absence of injunctive relief, the criminal violations being committed by Dallas Pride’s fiduciaries are likely to continue, causing future harm to Plaintiff and the LGBTQ+ community at large. If relief is not granted, Plaintiff and the LGBTQ+ community at large will suffer significant, if not irreparable, harm.

X. REQUESTS FOR ADDITIONAL RELIEF

10.01 Plaintiff seeks an order compelling Dallas Pride to produce the information that Plaintiff requested on June 29, 2025; August 12, 2025; and August 20, 2025.

10.02 Plaintiff is entitled to recover costs and reasonable and necessary attorney’s fees that are equitable and just under TEX. CIV. PRAC. & REM. § 37.009 because this suit seeks declaratory relief.

XI. PRAYER

WHEREFORE, Plaintiff respectfully requests and prays that:

- a) Plaintiff be granted declaratory relief as pleaded herein;
- b) Defendant be ordered to produce the records sought by Plaintiff;
- c) Plaintiff be granted injunctive relief as pleaded herein;
- d) Defendant be ordered to produce the public information sought by Plaintiff;
- e) Plaintiff be awarded damages in the amount of his costs of bringing this suit, including but not limited to court costs, discovery costs, deposition costs, and attorney's fees; and
- f) All other appropriate relief to which Plaintiff may be entitled.

Respectfully submitted,

/s/ Jeremy Liebbe
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PLAINTIFF

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jeremy Liebbe		jeremy@aequitas.me	6/6/2026 6:28:26 PM	SENT