

Cause No. 348-278342-15

BOBBY WAYNE LINDAMOOD, JR.,	§	IN THE DISTRICT COURT OF
AND JR'S DEMOITION &	§	
EXCAVATION, INC.	§	
	§	
Plaintiffs,	§	
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
KAYLA LYNN LINDAMOOD,	§	
MARANDA MICHELLE COLLINS,	§	
MICHAEL ALLEN TAYLOR, JAN	§	
MOGGED, JAMES RICHARD	§	
FLETCHER, AND PROTECT	§	
COLLEYVILLE PAC,	§	
	§	
Defendants.	§	348TH JUDICIAL DISTRICT

AFFIDAVIT OF JAN MOGGED

1. My name is Jan Mogged. I am more than 18 years old, have never been convicted of a felony or crime involving fraud or moral turpitude. I am fully competent to make this Affidavit.

2. All of the facts set forth herein are true and correct. All of the facts set forth herein are within and based on my personal knowledge.

3. I am a resident of Colleyville, Tarrant County, Texas. My husband is Chuck Mogged, who is a member of the Colleyville City Council. On May 9, 2015, Colleyville held an election for two City Council seats. One contested seat was held by Michael Taylor, the Mayor Pro Tempore of Colleyville who is a personal friend of my husband. This lawsuit relates to events surrounding that election.

4. On April 29, 2015, my husband attended a meeting at Worthington National Bank. I did not attend that meeting or any other meeting regarding the Taylor campaign or the Glade Road proposition. At the meeting my husband obtained an excerpt of Bobby Lindamood

Jr.'s deposition dated March 4, 2011 in the lawsuit, *In re: Estate of Bobby Lindamood [Sr.]*, Cause No. PR093184-1 in Probate Court No. 1 of Dallas County, Texas. I saw the excerpt. It contained no annotations in the margins or on top of the text, and no comments such as "Bad Behavior" or "Bad for Colleyville."

5. The "Alert" is the annotated version of the deposition testimony I saw that contains comments added in the margins and on top of the deposition text. Plaintiffs attached the Alert to their Petition in this case.

6. I did not make the Alert.

7. I did not author the Alert.

8. I did not publish the Alert to any other person.

9. I did not edit the Alert or the deposition of Bobby Lindamood.

10. I did not discuss the Alert with anyone.

11. I did not promote the Alert.

12. I did not endorse the Alert.

13. I did not hand out, hand-deliver, or mail the Alert.

14. I did not direct or work with any person to take any actions listed in Paragraphs 6-13 above with regard to the Alert.

15. On May 1, 2015, I campaigned door-to-door, or block-walked, for Nancy Coplen and against the Glade Road proposition that Bobby Lindamood supported. Nancy was running for a city council seat but not against Bobby Lindamood or Michael Taylor. I did not campaign for Michael Taylor nor did he ask me to do so.

16. During the walk, I encountered Richard and Linda Newton who asked me why I would support Nancy because she had aligned herself with a man of "bad character" like

Michael Taylor. Richard Newton asked if Michael would resort to dirty politics, I said no, and Richard said Michael would “have one of his minions do it.”

17. In response, I defended Michael Taylor’s character and told the Newtons that information existed about Bobby Lindamood that was bad for him. I did not provide information more specific than that.


18. I based my statement that bad information about Bobby Lindamood existed on the unannotated excerpt from Bobby Lindamood’s deposition transcript that I had seen. I believed the transcript was the copy of an actual deposition transcript, and therefore had to have been sworn to as true by Bobby Lindamood. The excerpt described Mr. Lindamood’s physical contact with a female who was not his wife and described an incident in Las Vegas with a prostitute.

19. On May 4, 2015, David Medlin confronted me and showed me the Alert. That is the first time I saw it. David Medlin pointed angrily to the comments “Bad Behavior, Bad Judgment, Bad for Colleyville” on the last page of the Alert, which were in red ink. He asked if I had “did this,” which I took to mean that he was asking if I was responsible for the Alert. I told him no.

20. On May 8, 2015, I was served with citation in this lawsuit.

Further the affiant sayeth not.

Dated: July 1, 2015.


Jan Mogged

STATE OF TEXAS §
 §
COUNTY OF TARRANT §

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this the 1st
day of July 2015.

