

Larry J. Watts II

303 N. Washington Avenue

Marshall, TX 75670

watts.larry@gmail.com | (903) 930-2071

April 6, 2025

Office of the Attorney General of Texas

P.O. Box 12548

Austin, TX 78711-2548

Subject: Formal Complaint Regarding Withholding of Public Records in Violation of the Texas Public Information Act, Insurance Fraud, Conspiracy to Defraud, Engineer Misrepresentation & Coordinated Obstruction – City of Marshall, Eric Powell (City Engineer), Continental Casualty Company (“CNA” Contractors Insurance Company), Casey Slone Construction, LLC (City Third Party Contractor), and Bockmon Insurance Agency (Contractors Agent).

Dear Attorney General,

I am writing to formally report a serious matter involving potential criminal activity, insurance fraud, and violations of the Texas Public Information Act by the City of Marshall, Texas; Casey Slone Construction, LLC (insured by Continental Casualty Company “CNA”); CNA; and Eric Powell, City Engineer for the City of Marshall.

In February 2024, the City of Marshall undertook a construction project to replace downtown sidewalks. I, Larry Watts, am the owner of the property located at 303 N. Washington Avenue, which sustained documented damage as a result of this construction.

The City of Marshall and their contractor, Casey Slone Construction, LLC engaged in a pattern of obstruction refusing to provide timely necessary information, including insurance details pertaining to the damage to my property. Furthermore, once the insurance information was finally obtained, CNA (Contractors Insurance Company) refused to accept or report my claim without Casey Slone's permission.

CNA (Contractors Insurance Company) obtained an independent forensic engineer to investigate the damages. It has come to my attention, the independent engineering report was revised. In further review of the revised report it is evident that CNA, Casey Slone, and City Engineer Eric Powell colluded to manipulate a forensic engineer's report to reverse liability for the damage. Mr. Powell appears to have made false statements and provided

misleading information that contradicts the events, photographic evidence, and the original forensic engineer's conclusion.

On September 12, 2024 I submitted a written public records request to the City of Marshall Texas for all correspondence submitted to the engineer, insurance company and/or Casey Sloan (contractor) regarding the damages at 303 N. Washington Avenue. Ninety days later on December 12, 2024 I received the information from the public records request and noted the communications referred to in the Engineer's report, along with others, were withheld violating the Texas Public Information Act.

Specifically, I am respectfully requesting that your office take the following actions:

- 1) Refer this matter to the Open Records division for immediate disclosure of all previously withheld public information.
- 2) Refer this matter to the TDI (Texas Department of Insurance) and other applicable agencies for investigation into unfair and deceptive business practices, fraud, and manipulation of evidence by CNA, Casey Slone, and Eric Powell.
- 3) Initiate a TDI investigation into CNA's claim suppression.
- 4) Request a PE Board review of Mr. Powell's conduct.

Detailed information and supporting documentation for these, and many more matters, can be found at <https://www.contractordamages.com/ag/Outline.htm>.

Thank you for your time and consideration of this serious matter.

Sincerely,

Larry Watts