



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

March 10, 2026

Chris Hill  
Collin County Judge  
Administration Building  
2300 Bloomdale Rd.  
McKinney, TX 75071

Susan Fletcher  
Collin County Commissioner  
Administration Building  
2300 Bloomdale Rd.  
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Cheryl Williams  
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Darrell Hale  
Collin County Commissioner  
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Duncan Webb  
Collin County Commissioner  
Administration Building  
2300 Bloomdale Rd.  
McKinney, TX 75071

Dear Collin County Commissioners Court:

My office recently sued to invalidate the illegal annexation of land intended to facilitate the development of the East Plano Islamic Center City (“EPIC City”). This attempted annexation was ostensibly approved by the unlawfully constituted board of directors for Double R Municipal Utility District No. 2A. Separately, EPIC City has submitted platting for approval to Collin County to develop “The Meadow Phase 1” —an innocuously branded first step toward full development of EPIC City.

I am advised that to date you have refused to approve EPIC City’s requested plat application due to its multiple deficiencies and the insufficiency of information provided. I write today to advise you that issues relating to some of these deficiencies are the subject of active litigation brought by the State of Texas—namely, the composition of the Double R board of directors and the validity of the purported land annexation designed to facilitate development of the proposed EPIC City

project. Accordingly, as the State's chief legal officer, I advise you to reject any relevant plat applications, including the application package submitted on December 23, 2025, for the proposed development called "The Meadow Phase 1." This lawsuit is attached for your reference.

Additionally, please be advised that my office is currently involved in separate active litigation against the individuals and business entities behind the proposed EPIC City development for violations of securities laws, including engaging in fraudulent practices while soliciting funds and failing to screen for accredited-investor status. Among other things, this lawsuit alleges that certain promotional materials implied that the project would unlawfully be reserved for Muslims specifically and described the development as the "epicenter of Islam in North America." Despite promising not to do so, EPIC City's developers have also allegedly funneled a significant amount of the funds to their own pockets. This lawsuit, also attached for your reference, casts further doubt on the legitimacy and lawfulness of any requests or development applications made to Collin County.

Be advised that my office's investigation of EPIC City, its developers, and associated governmental or nongovernmental entities is ongoing. Additional legal action may commence in the future. I urge you to seek your own legal counsel in navigating these issues. As the State's chief legal officer, however, I advise you that the troubling issues underlying EPIC outlined in the above referenced lawsuits should be considered as reasonable bases to use all lawful means at your disposal to deny efforts to further develop EPIC City in Collin County.

For Texas,

A handwritten signature in black ink that reads "Ken Paxton". The signature is written in a cursive, flowing style.

Ken Paxton  
Texas Attorney General